

SECTION 4.0 DISCUSSION OF ENVIRONMENTAL CHECKLIST QUESTIONS

I. AESTHETICS

Would the proposed project:

- a) *Have a substantial adverse effect on a scenic vista?*
- b) *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

No Impact. Based on review of the City's General Plan Resource Management Element (Fullerton 1996) and the California Department of Transportation (Caltrans) website, there are no designated scenic vistas or Local or State Scenic Highways within the vicinity of the project site (Caltrans 2010). The project site is void of scenic resources. As previously discussed in Section 2, the project site is currently developed with vacant buildings previously utilized for activities associated with the World Citrus Facility. The visual change associated with the proposed project from a site developed with vacant industrial buildings to a site without structures is discussed further in Item I.c below. The proposed project would not have an adverse effect on a scenic vista, and would not damage scenic resources within a Local or State Scenic Highway.

- c) *Substantially degrade the existing visual character or quality of the site and its surroundings?*

No Impact. As identified above, the project site is currently developed with industrial uses comprised of eight buildings and associated facilities. The site is completely surrounded by urban development with the railroad located directly to the south. Surrounding land uses include industrial and retail/commercial (restaurant/bars and nightclubs) and limited residential uses. Residential uses are located to the north of the site across Santa Fe Avenue and also located farther to the south, across the railroad tracks and Walnut Avenue. The project site is visible from immediately surrounding land uses; however, existing development obstructs views from other vantage points.

To assess the existing visual character and to determine the potential visual change that may result from implementation of the proposed project, a site reconnaissance was conducted in July 2010. Exhibit 4-1 provides photographs which depict views of the site from various vantage points surrounding the project site. These views are described below.

View 1: View from the northeastern corner of Santa Fe Avenue and Malden Avenue looking west toward the project site. This view from Santa Fe Avenue looking west depicts the project site and land uses along the northern side of Santa Fe Avenue. As shown in the photograph, the existing buildings on the project site are visible. A chain-link fence, utility poles, light standards, and street trees are also visible in this view. Building No. 7a is prominently featured in this view (refer to Exhibit 2-3, Site Plan, for the layout of the building numbers on the project site). As shown in this view, Building No. 7a abuts the existing street right-of-way. Commercial uses to the north of the project site across Santa Fe Avenue and on-street parking are also visible.

View 2: View from the corner of Highland Avenue and Santa Fe Avenue looking east toward the project site. This view depicts the project site from Highland Avenue looking east. An existing industrial structure (Building No. 12) and land uses along the northern side of Santa Fe Avenue can be seen. Street trees, utility poles, a chain-link fence with barbed wire, on-street parking, and a portion of the landscaped corner of Highland Avenue and Santa Fe Avenue are also visible in this view. The primary focus of the view is the existing industrial structures on the project site.

View 3: View from Santa Fe Avenue looking south toward the project site. This view shows a portion of the project site from Santa Fe Avenue. The truck ramp and loading dock are located in the upper left-hand corner of this view; the views of these facilities are partially obstructed by street trees and other vegetation. Utility poles and lighting standards, a chain-link fence, and debris on the project site are also visible in this view.

View 4: View from Walnut Avenue looking northeast toward the project site, south of the BNSF railroad tracks. This view depicts the project site from Walnut Avenue looking northeast. The railroad tracks and railroad right-of-way as well as the existing structures on the project site are visible in this view. A chain-link fence with barbed wire is visible and vehicles can be seen parked along Walnut Avenue.

Implementation of the proposed project would involve the demolition of the existing on-site buildings, removal of above-grade facilities associated with the existing buildings, and retention of the existing concrete/asphalt. Existing fencing would remain and new fencing would be installed, as necessary, to enclose the site. The existing buildings have been vacant for several years (since 2006) and are in varying stages of disrepair. There is also debris associated with the former uses littering the project site. While the views of the project site from surrounding vantage points would be altered, the proposed project would not substantially degrade the existing visual character or quality of the site or its surroundings. Once the demolition activities are completed, views of the project site would be improved over existing conditions. No significant impact would occur and no mitigation is required.

During demolition activities at the site, there would be views of construction equipment, ongoing demolition activities, short-term stockpiles of building debris, and haul trucks to remove the demolition debris. This potential impact is less than significant because of its temporary nature and because the views would be typical of construction sites for industrial and commercial projects in an urban environment.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

No Impact. The primary light source currently on the project site comes from the street light standards located along Santa Fe Avenue. Project implementation would not add any new sources of light. All demolition activities would occur during daylight hours. No impact would result, and no mitigation is required.

II. AGRICULTURE RESOURCES

Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?



View 1: View from the northeast corner of Santa Fe Avenue and Malden Avenue looking west toward the project site.



View 2: View from the corner of Santa Fe Avenue and Highland Avenue looking east toward the project site.

View Locations



View 3: View from the northern side of Santa Fe Avenue looking southeast toward the project site.



View 4: View from Walnut Avenue looking northeast toward the project site.

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Existing Site Conditions

World Citrus Buildings Demolition Project

Exhibit 4-1



- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?**
- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104[g])?**
- d) Result in the loss of forest land or conversion of forest land to non-forest use?**
- e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

No Impact. The project site is located in an urbanized area and would not convert farmland to non-agricultural use. The site currently has a General Plan land use designation of Industrial and is currently developed. No portion of the project site is covered by a Williamson Act Contract or located on land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance according to the 2008 California Department of Conservation, Farmland Mapping and Monitoring Program. The *City of Fullerton General Plan's* Resources Management Chapter, does not identify the project site as an area of agricultural production (Fullerton 1996). In addition, the project site does not contain designated forest land or timberland as defined in *Public Resources Code* Sections 12220[g] and 4526, respectively. Therefore, no impacts to agricultural resources, forest land, or timberland would result from project implementation, and no mitigation is required.

III. AIR QUALITY

Would the project:

- a) Conflict with or obstruct implementation of the applicable air quality plan?**

No Impact. The regional plan applicable to the proposed project is the South Coast Air Quality Management District's (SCAQMD's) Air Quality Management Plan (AQMP). This section discusses the consistency of the proposed project with the AQMP. The purpose of this discussion is to address consistency with the assumptions and objectives of the AQMP and discuss whether the project would interfere with the region's ability to comply with Federal and State air quality standards. If the decision-maker determines that the project is inconsistent with the AQMP, the lead agency may consider project modifications or inclusion of mitigation to eliminate the inconsistency.

The SCAQMD's CEQA Handbook states that "New or amended General Plan Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP". The proposed project does not include any of these actions; however, a consistency analysis has been prepared. A proposed project should be considered to be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The Handbook identifies two key indicators of consistency which are evaluated below:

- (1) Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP (except as provided for CO in Section 9.4 for relocating CO hot spots).

Based on the air quality modeling analysis conducted for the proposed project (see the discussion provided below under Item III.b), the proposed project would not result in significant

impacts based on the SCAQMD thresholds of significance. Demolition activities would not increase the frequency or severity of existing air quality violations due to required compliance with SCAQMD Rules and Regulations. The proposed project is not projected to contribute to the exceedance of any air pollutant concentration standards. There would be no short- or long-term local air quality impacts. Therefore, the project is consistent with the AQMP for the first criterion. The second criterion evaluates:

- (2) Whether the project will exceed the assumptions in the AQMP in 2010² or increments based on the year of project buildout and phase.

Consistency with the AQMP assumptions is determined by performing an analysis of the project with the assumptions in the AQMP. Therefore, the emphasis of this criterion is to insure that the analyses conducted for the project are based on the same forecasts as the AQMP. The project would not generate any new long-term air pollutant emissions, increase population or employment in the area, or exceed assumptions in the AQMP. Therefore, the emissions from the project would be consistent with the AQMP assumptions. The project is consistent with the AQMP for the second criterion.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. A project may have a significant impact where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation.

The Federal Clean Air Act (42 *United States Code* [USC] §§7401–7671) requires the adoption of National Ambient Air Quality Standards (NAAQS) to protect public health and welfare from the effects of air pollution related to seven air pollutants: ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), coarse particulate matter 10 microns or less in diameter (PM₁₀), fine particulate matter 2.5 microns or less in diameter (PM_{2.5}), and lead (Pb). The California Air Resources Board (CARB) has established additional State standards, which are generally more stringent than the NAAQS.

Regional air quality is described by whether the area has attained State and federal standards, as determined by monitoring. Areas in nonattainment are required to prepare plans and implement measures to bring the region into attainment. When an area has been reclassified from nonattainment to attainment for a federal standard, the status is identified as “maintenance”, and there must be a plan and measures that will keep the region in attainment for the following ten years. Table 4-1 summarizes the attainment status in the South Coast Air Basin (SoCAB) for the seven criteria pollutants.

² The Handbook was written in 1993. At that time, 2010 referred to the horizon year for traffic projections.

**TABLE 4-1
ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN
THE SOUTH COAST AIR BASIN**

Pollutant	State	Federal
O ₃ (1 hour)	Nonattainment	No standard
O ₃ (8 hour)		Extreme Nonattainment ^a
PM10	Nonattainment	Serious Nonattainment ^b
PM2.5	Nonattainment	Nonattainment
CO	Attainment	Attainment/Maintenance
NO ₂	Nonattainment ^c	Attainment/Maintenance
SO ₂	Attainment	Attainment
Lead	Attainment/Nonattainment ^d	Attainment
All others	Attainment/Unclassified	No standards

O₃: ozone; PM10: particulate matter 10 microns or less in diameter; PM2.5: particulate matter 2.5 microns or less in diameter; CO: carbon monoxide; NO₂: nitrogen dioxide; SO₂: sulfur dioxide.

^a The USEPA approved redesignation from Severe 17 to Extreme Nonattainment on May 5, 2010, to be effective June 4, 2010.

^b On April 10, 2010, CARB requested the USEPA to designate the SoCAB as an attainment area for the PM10 federal standard.

^c The SoCAB was reclassified from attainment to nonattainment for NO₂ on March 25, 2010.

^d Los Angeles County was reclassified from attainment to nonattainment for lead on March 25, 2010; the remainder of the SoCAB is in attainment of the State standard.

Source: CARB 2010a, USEPA 2010a, USEPA 2010b.

CARB regulations define a toxic air contaminant (TAC) as one which may cause or contribute to an increase in deaths or serious illnesses, or which may pose a present or potential hazard to human health.³ TACs are considered under a different regulatory process than criteria pollutants. Health effects from TACs may occur at extremely low levels, and it is typically difficult to identify levels of exposure that do not produce adverse health effects. Therefore, there are no ambient concentration standards for TACs. According to the California Almanac of Emissions and Air Quality (CARB 2009b), the majority of the estimated health risk from TACs can be attributed to relatively few compounds, the most important being PM from diesel-fueled engines (diesel PM).

This section includes an evaluation of short-term air quality impacts associated with proposed demolition activities. The project site would be left undeveloped; there are currently no plans for future development. Therefore, no long-term operational emissions would occur.

Demolition - Mass Daily Emissions

The proposed project includes demolition of the existing structures in an area of approximately 2.25 acres. Air pollutant emissions associated with demolition activities would occur between four to six weeks in the fall of 2010. Air pollutant emissions would occur as a result of the use of mechanical equipment, fugitive dust from demolition, hauling brick and debris from the site, and emissions from vehicles driven to and from the site by construction (demolition) workers. A project with daily emission rates below the SCAQMD's established air quality significance thresholds (shown in Table 4-2) would have a less than significant effect on regional air quality. An assessment of project-generated, short-term air pollutant emissions was conducted using the URBEMIS2007, Version 9.2.4 computer model to quantify regional emissions and was supplemented by manual calculations (refer to Appendix A for the URBEMIS2007 calculations).

³ The USEPA uses the terminology "hazardous air pollutant" (HAP), which has a similar definition.

Table 4-2 presents the estimated maximum daily emissions with application of SC AQ-1 for dust control during the proposed project demolition, and compares the estimated emissions with the SCAQMD daily mass emission thresholds.

As shown in Table 4-2, short-term emissions generated by the proposed project would be less than the SCAQMD regional thresholds of significance. Therefore, the impact would be less than significant and project-specific mitigation for maximum daily emissions is not required during demolition activities.

**TABLE 4-2
ESTIMATED MAXIMUM DAILY CONSTRUCTION/DEMOLITION EMISSIONS
(LBS/DAY)**

Year	VOC	NOx	CO	SOx	PM10	PM2.5
Fall 2010	1	10	7	<1	2	1
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds SCAQMD Thresholds?	No	No	No	No	No	No
NOx: oxides of nitrogen; SOx: oxides of sulfur See Appendix A for URBEMIS calculations.						

Demolition – Localized Significance Thresholds/Ambient Air Quality

In addition to the mass daily emissions thresholds established by the SCAQMD, short-term, on-site emissions of NO₂, CO, PM10, and PM2.5 are examined for local impacts to nearby sensitive receptors based on SCAQMD localized significance thresholds (LST). To assess local air quality impacts for development projects without complex dispersion modeling, the SCAQMD developed screening (lookup) tables to assist lead agencies in evaluating impacts. The LST methodology is recommended to be limited to projects of five acres or less. For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, convalescent facility where it is possible that an individual could remain for 24 hours. Commercial and industrial facilities are not included in the definition of a sensitive receptor because employees do not typically remain on site for a full 24 hours. The closest receptors would be the single-family homes located approximately 70 feet north of the site and the Amerige Park baseball field located approximately 250 feet west of the site.

Table 4-3 shows the maximum daily on-site emissions for demolition activities compared with the SCAQMD thresholds. Table 4-3 shows the emissions thresholds for local pollutants with receptors at 25 meters (82 feet); the SCAQMD methodology prescribes the use of the 25-meter factor for all receptors within 25 meters for 2- and 5-acre sites. The project site is approximately 2.25 acres in area. As shown in Table 4-3, the local emissions from the proposed project would be less than the thresholds for sites in the 2- to 5-acre range. SC AQ-1 would assure that dust-control measures are implemented during demolition. With implementation of SC AQ-1, the local pollutant impact from on-site demolition activities would continue to be less than significant.

**TABLE 4-3
LOCAL SIGNIFICANCE THRESHOLD EMISSIONS**

	NOx	CO	PM10	PM2.5
	Emissions (lbs/day)			
LST Thresholds: 2-acre site	147	550	6	4
LST Thresholds: 5-acre site	221	550	11	6
Project maximum daily on-site emissions	8	5	2	1
Exceed 5-acre threshold?	No	No	No	No
NOx: nitrogen oxides; CO: carbon monoxide; PM10: particulate matter with a diameter of 10 microns or less; PM2.5: particulate matter with a diameter 2.5 microns or less; lbs: pounds; LST: localized significance threshold Note: Data is for SCAQMD Source Receptor Area 16, North Orange County. Source: SCAQMD 2008.				

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State Ambient Air Quality Standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact. Orange County is a nonattainment area for PM10, PM2.5, NO₂, and O₃. The proposed project would generate these pollutants during short-term demolition activities. As demonstrated under Item III.a above, the proposed project would not conflict with the 2007 AQMP. In addition, as detailed in response to Item III.b, with implementation of SC AQ-1, short-term emissions would be substantially less than the SCAQMD regional and localized significance thresholds. It is anticipated that concurrent demolition may occur adjacent to the project site as preparation for the construction of the SOCO West Parking Structure. The demolition for the parking structure would be a project similar to the proposed project. Because emissions for the demolition activities are well below CEQA significance criteria, the combination of the two projects would not result in emissions approaching significance thresholds. Therefore, with implementation of SC AQ-1, the proposed project's contribution of PM10, PM2.5, NO₂, and O₃ would not be cumulatively considerable.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. A significant impact may occur when a project would generate pollutant concentrations to a degree that would significantly affect sensitive receptors, which include populations that are more susceptible to the effects of air pollution than the population at large.

Exposure of sensitive receptors is addressed for four situations: CO hotspots; diesel exhaust emissions; local emissions of nitrogen oxides (NOx), CO, PM10, and PM2.5; and asbestos and lead paint during demolition. A CO hotspot is an area of localized CO pollution caused by severe vehicle congestion on major roadways, typically near intersections. If a project increases average delay at signalized intersections operating at Level of Service (LOS) E or F, or causes an intersection that would operate at LOS D or better without the project to operate at LOS E or F with the project, a quantitative screening is required. The project would not generate substantial vehicular trips during demolition activities (approximately ten one-way trips per day for a period of four to six weeks). This amount of short-term traffic would not generate localized CO impacts.

Demolition activities would result in short-term diesel exhaust emissions from heavy-duty equipment on site. CARB identified particulate exhaust emissions from diesel-fueled engines

(diesel PM) as TACs in 1998. Demolition activities would generate diesel PM emissions through the use of off-road and on-road diesel equipment used to transport materials from the project site. Exposure is a combination of the emissions rate and the length of time exposed, with exposures calculated over periods of 70 years. The proposed project would have relatively little diesel equipment, and the demolition period would be less than 2 months, which is considerably less than the 70-year exposure timeframe. The exposure to nearby individuals would be less than threshold levels, and the impact would be less than significant. No mitigation is required.

Exposure of persons to NO_x, CO, PM₁₀, and PM_{2.5} emissions is discussed in response to Item III. b above. No significant impacts would result with implementation of SC AQ-1.

Exposure of persons to asbestos and lead paint during demolition is addressed in Section VII, Hazards and Hazardous Materials, of this IS/MND. This potential impact is less than significant with implementation of identified SCs and MMs.

e) Create objectionable odors affecting a substantial number of people?

No Impact. Proposed demolition activities would not result in objectionable odors affecting a substantial number of people. The project site is in a developed area surrounded mostly by commercial and industrial uses. No mitigation is required.

Mitigation Program

Standard Conditions and Requirements

SC AQ-1 During demolition of the proposed project, the Applicant and its contractors shall be required to comply with SCAQMD Rules 402 and 403, which shall assist in reducing short-term air pollutant emissions. SCAQMD Rule 402 requires that air pollutant emissions not be a nuisance off site. SCAQMD Rule 403 (Tables 1, 2, and 3 of Rule 403) requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. This requirement shall be included as notes on the contractor specifications.

IV. BIOLOGICAL RESOURCES

Would the project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**
- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?**
- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**
- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

- e) **Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**
- f) **Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

No Impact. The project site is entirely developed with industrial uses consisting primarily of eight buildings, a loading dock, a truck ramp, and paved surfaces. Street trees are located along Santa Fe Avenue. These trees would remain in place during and after demolition activities. There are no natural biological resources present on site, and implementation of the proposed project would not impact any candidate, sensitive, or special status species. Furthermore, the project site does not contain riparian habitat, wetlands, or any other sensitive natural community. The project site is within a developed, urban area and does not support any wildlife movement.

The proposed project would not conflict with any local policies or ordinances protecting biological resources. The project site is not located within an adopted habitat conservation plan or natural community conservation plan.

No impacts to biological resources would result from implementation of the proposed project and no mitigation is required.

V. CULTURAL RESOURCES

Would the project:

- a) **Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?**

Information in this section is based on the *Historic Resource Assessment* prepared by Chattel Architecture (December 2009). This report is provided in Appendix B of this Initial Study and summarized below.

No Impact. An architectural evaluation of the World Citrus building complex located at 200-249 W. Santa Fe Avenue was performed by qualified staff of Chattel Architecture. The evaluation was based on a review of archival information from the Fullerton Public Library and original building permits from the City of Fullerton. Other resources examined include the *Los Angeles Times*, *Fullerton News Tribune*, and resources on the citrus industry history from the University of Southern California and City of Ontario Libraries. Evaluation of the buildings located on the project site consisted of using National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and Fullerton Register of Landmarks and Historic Districts criteria. This evaluation integrates research completed on the California citrus and citrus byproduct industries to form a context statement and observations specific to the project site.

The proposed project is located on the western portion of a site previously occupied by the World Citrus Facility where fruit juices were processed and packaged (operations ceased in March 2006). As depicted on Exhibit 4-2, Existing Buildings on the Project Site, the World Citrus Facility on the project site is comprised of eight buildings. The buildings on the project site were built between 1950 and 2002. Buildings 7 and 9 through 13 were built by the Anaheim Cold Storage Company between 1952 and 1958, and Buildings 8 and 14 were built by successor companies between the 1980s and 2002. All buildings (Building Nos. 7–14) would be demolished as a part of the project. A brief description of these buildings is provided below.

- **Building 7.** Building 7 was constructed by Anaheim Cold Storage in 1955. The building is a single-story, windowless brick masonry building with a flat roof. The building is framed with Douglas fir rafters and studs, and has a tapered steel truss support system and concrete floors. It consists of two main sections: a smaller south room used for dry storage and a larger room to the north used for cold storage. There is a wood frame extension on the southern end of the building along the railroad tracks with a canopied entrance.
- **Building 8.** Building 8 is a single-story, small (approximately 8 feet by 8 feet), windowless wood-framed building constructed some time before 1983. Its design suggests that it is a pre-fabricated structure. Building 8 is a utility shed for Building 7 (to the east) and Building 9 (to the south).
- **Building 9.** Building 9 was built in or around 1952. Building 9 is a single-story, windowless wood-framed building covered in horizontal wood siding. On the southern elevation, a wood frame shed roof runs along the railroad tracks, probably utilized to provide shade for produce during transfer during the period that the railroad was used to transport citrus to the storage facility. The building has a concrete floor and plywood sheathing on the interior walls and ceiling. A long gallery room separated from the main floor with a wood wall runs along the northern elevation. A similar gallery space with a low ceiling stretches the length of the southern elevation. Building 9 shares a wall with Building 7, and connects to Building 7 on the east and Building 10 on the west via large open doorways.
- **Building 10.** Building 10 was built in or around 1952 and is a single-story, windowless wood-framed building covered in wood siding with a double bowstring steel truss support system. Its main, northern entrance is inset, and covered by a wood-framed porch. A concrete loading dock with a sheet metal roof that connects to the main entrance porch was added in 1982. Building 10 connects to Building 9 via an open, overhead steel-framed doorway, and connects to Building 11 via an overhead doorway with an insulated steel door on a sliding track. The building has concrete floors and plywood sheathing on the interior walls.
- **Building 11.** Building 11 was built in or around 1955 and is a single-story, windowless wood-framed building with a double bowstring steel truss support system. The building is covered in horizontal wood siding. The southern entrance to the building is covered by a small, wood-framed shed roof. The building has a concrete floor, and plywood sheathing on the walls and ceiling. Building 11 connects to Building 12 through an overhead doorway with an insulated steel door on a sliding track.
- **Building 12.** Building 12 was most likely built in or around 1958. Building 12 is a single-story, steel-reinforced concrete building with a flat roof. Building 12 consists of a large central room and long gallery rooms on the northern and southern sides of the building. The central room's cast concrete structure is supported by three east-west rows of alternating steel and wood posts. The northern gallery is separated from the main room by a concrete wall, and features a row of wood post supports. The southern gallery is separated from the main room by a wood wall, and has a southern entrance covered by a small, wood-framed shed roof.
- **Building 13.** Building 13 is a single-story, wood-framed, L-shaped building. It was most likely built in or around 1952. The eastern portion of Building 13 is shed-roofed (joining



Source: Chattel Architecture 2010

Existing Buildings on the Project Site

Exhibit 4-2

World Citrus Buildings Demolition Project



Bonterra
CONSULTING

Building 9 at gable peak), and the western portion is gabled. The interior walls of Building 13 are covered in plywood sheathing and wood siding.

- **Building 14.** Building 14 (built before 1983) is a single-story, rectangular, temporary structure that resembles a pre-fabricated modular office typically utilized at construction sites. The structure does not have a footing. It is currently used as office space for the property's security guard. Building 14 has a flat roof and is covered with wood paneling. A metal canopy roof connects the roof at the southern end of Building 14 to Building 9.

Assessment of the buildings on the project site under NRHP, CRHR, and Fullerton Register of Landmarks and Historic Districts criteria in relation to the historic context, as presented in the *Historic Resource Assessment*, indicates that the World Citrus West buildings on the project site are not a historic resource as defined by federal, State, and local standards. This determination was made because the project site is not representative of the significant historic context of California citrus cultivation and packing houses, as it supported the citrus byproduct industry. In general, architectural resources connected to the citrus byproduct industry cannot claim sufficient State or local importance to be deemed architecturally significant. By the 1950s, the citrus byproduct industry in California drew from numerous non-local sources for fresh produce. Furthermore, California's production of citrus byproducts was insignificant compared to Florida's production. Aside from consideration of context, the World Citrus Facility is not significant in terms of architecture, as buildings on site do not have physical qualities that would qualify them for evaluation under the architectural criterion. No impact to historic resources would occur with the proposed demolition activities, and no mitigation is required.

- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?**
- c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**
- d) Disturb any human remains, including those interred outside of formal cemeteries?**

No Impact. As previously stated, the project site is developed with eight industrial buildings numbered 7-14 as shown on Exhibit 4-2. Between 1950 and 2006, the buildings were utilized in support of the citrus industry for cold storage and packaging. However, a review of historic maps and aerial photographs indicate that scattered residential development existed on site beginning as early as 1900. By the 1920's, the project site supported several industrial activities. The project site has not yielded information important in prehistory or history, and the industrial nature of activities conducted at the World Citrus facility over the 20th century makes the presence of undisturbed archaeological or paleontological material beneath the site highly unlikely. The proposed project involves the demolition of the existing structures and associated aboveground building features on the project site. The existing asphalt and concrete surface would remain in place as no grading or excavation at the site would occur with the proposed demolition activities. Because no subsurface activities would occur, demolition activities would not encounter or yield undiscovered archaeological or paleontological resources or human remains. No impact would occur, and no mitigation is required.

VI. GEOLOGY AND SOILS

- a) **Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**
- i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; or**
 - ii) **Strong seismic ground shaking?**
 - iii) **Seismic-related ground failure, including liquefaction; or**
- c) **Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?**
- d) **Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1004), creating substantial risks to life or property?**

No Impact. The project site, as with the entire Southern California region, is subject to secondary effects from earthquakes. According to the Alquist-Priolo Earthquake Fault Zoning Map, there are no active faults on the site. However, as indicated on Exhibit CHS-1, Public Safety Map, of the City's General Plan, the "Norwalk or Related Fault" range traverses the City of Fullerton in an east-west direction and is located adjacent to the project site approximately 0.25 miles to the north of the project site and is considered a potentially active fault (Fullerton 1996). Other faults in the area include the Whittier/Elsinore Fault (approximately 5 miles northeast of the project site). While the project area would potentially be subject to seismic ground shaking due to earthquakes, the project does not propose construction of habitable structures of any kind. The nature of the proposed project would not expose people or structures to potentially adverse effects related to seismic ground shaking. As such, no impacts would result, and no mitigation is required.

iv) Landslides?

No Impact. The topography of the project site is relatively flat and no landslides have occurred or have been documented on or near the site. The General Plan's Community Health and Safety Element indicates that areas subject to seismically induced bedrock landslides are limited to the steeper portions of the East and West Coyote Hills. In addition, Exhibit CHS-1, Public Safety Map, illustrates that the project site is not located in an area subject to seismically induced landslides. The potential for landslides on the project site is considered low. Additionally, the project does not propose construction of habitable structures and would not expose people or structures to potentially adverse effects related to landslides. No impacts would result and no mitigation is required.

b) Result in substantial soil erosion or the loss of topsoil?

No Impact. The proposed project site is currently developed and paved with non-porous materials; this condition would continue after the demolition of the existing buildings. The proposed project would result in the demolition of the existing structures and associated aboveground building features on the project site. Existing concrete/asphalt would be retained; no grading or excavation at the site would occur. The project site is relatively flat, with very little variation in topography. Alteration to the project site would not result in substantial changes in topography or create erosion or unstable conditions. Since the site would continue to have impervious surfaces and no soil would be exposed following completion of the project, the

potential for erosion and/or unstable conditions is remote. Additionally, as described in Section 2, the proposed project involves installation of an erosion control measure to address dust and other debris that could occur on the project site. No impacts would result and no mitigation is required.

e) *Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?*

No Impact. The project does not include the development of either septic tanks or alternative wastewater systems. No related impacts would result, and no mitigation would be required.

VII. GREENHOUSE GAS EMISSIONS

Would the project:

a) *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Less Than Significant Impact. Demolition activities would start in September 2010 and would occur over approximately four to six weeks. The principal source of greenhouse gas (GHG) emissions would be the internal combustion engines of construction equipment, on-road construction vehicles, and workers' commuting vehicles. CO₂ emissions were obtained from the URBEMIS model described under Item III, Air Quality. GHG emissions from proposed demolition activities are estimated at 13 metric tons of carbon dioxide equivalent (MTCO₂e.) There would be no operational emissions with the project. GHG calculation worksheets are provided in Appendix A.

There are no established quantitative federal, State, regional, or local CEQA significance criteria for GHG emissions, except for industrial projects where the SCAQMD is the lead agency. The threshold for those projects is 10,000 MTCO₂e per year. For residential and commercial projects, suggested thresholds from various air quality agencies have ranged from 900 to 10,000 MTCO₂e per year. Estimated GHG emissions for the proposed project would be substantially less than suggested and adopted thresholds. The impact would be less than significant; no mitigation measures are required.

b) *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

No Impact. The principal overall State plan and policy related to GHG emissions is Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. AB 32 establishes a State goal of reducing GHG emissions to 1990 levels by the year 2020. The plans, policies, and regulations adopted to support the AB 32 goals primarily address (1) reducing transportation GHGs with actions including vehicle fuel efficiency standards and low carbon fuels and (2) reducing GHGs from energy generation and consumption with actions including renewable energy generation and energy efficient buildings. The majority of the plans, policies, and regulations address operational features or projects and are not applicable to the proposed project. However, one element of AB 32 addresses improved recycling of solid waste. There are no applicable regional or City plans, policies, or regulations adopted for the purposes of reducing GHG emissions.

Construction activities associated with the proposed demolition project would consume fuel and generate GHGs, as described in response to Item III.a, above. SC Util-1, under the discussion

of Item XVII, Utilities and Service Systems, requires the Applicant is required to divert 50 percent of demolition debris generated from the demolition project from landfills by recycling, reuse, and diversion programs. Implementation of SC Util-1 during demolition is consistent with AB 32's GHG reduction measures.

The proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. No impact would occur and no mitigation measures are required.

VIII. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. During the demolition of the proposed project, there is a limited risk of accidental release of hazardous materials such as gasoline, oil, or other fluids in the operation and maintenance of construction equipment. Compliance with the City's *Municipal Code* (Title 14, Buildings and Construction) as well as standard State and local construction requirements would reduce the risk of any damage or injury from these potential hazards to a less than significant level. Because the site would remain vacant and undeveloped following completion of the proposed demolition activities, hazardous emissions or the routine use, transport, or disposal of hazardous materials would not occur. No mitigation is required.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

The information in this section is based on a *Phase I Environmental Site Assessment Update and Asbestos and Lead-Based Paint Surveys* prepared for the project site (Northgate Environmental Management, Inc. 2010). The Phase I Environmental Site Assessment (ESA) Update is provided in Appendix C of this Initial Study.

Less Than Significant With Mitigation Incorporated. The Phase I ESA Update was performed to identify and evaluate Recognized Environmental Conditions (RECs) at the project site. The term "Recognized Environmental Conditions" means the presence or likely presence of hazardous substances or petroleum products on the project site under conditions that indicate an existing release, a past release, or a material threat of a release of hazardous materials or petroleum products into structures on the site or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with existing laws.

Findings of Previously Prepared Reports

The Phase I ESA Update relied upon several previously prepared reports addressing the project site and the World Citrus Facility located on the property to the east of the project site. These reports include: a Draft Phase I ESA prepared for the entire World Citrus Facility in 2005; pre-demolition asbestos and lead surveys for the entire World Citrus Facility in 2007; a Phase I ESA for the project site in August 2007; and a limited Phase II Soil Investigation for the project site (2007). The Phase I ESA Update provides a discussion of each of these reports, and is an update to the 2007 Phase I ESA.

The 2007 Phase I ESA identified several RECs associated with Building No. 13 including pole-mounted transformers (street site of the building); oil staining and corrosion of the concrete floor; anhydrous ammonia tanks; two condensers on the western side of the building; and insulated coolant circulation piping (from inside of the building through the ceiling and across the rooftops of all the cold storage buildings). Additionally, heaving staining and etching was evident through the battery storage area (adjacent to Building No. 9). Other historically recognized RECs were also identified (refer to the discussion provided in the Phase I ESA Update included in Appendix C).

Based on the findings of the 2007 Phase I ESA, a limited Phase II Soil Investigation was conducted to analyze the site conditions for the western half of the World Citrus facility and a Limited Phase II Soil Investigation report was prepared. Fifteen soil borings were performed at the facility, and 44 soil samples were collected. Thirty-one samples were analyzed for TPH (gasoline, diesel, and motor oil) and metals, with selected samples analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyl (PCBs), and/or organochlorine pesticides (OCPs). Based on laboratory results, no TPH was detected above laboratory reporting limits in any of the samples. Except for arsenic, no metals were detected above regulatory action levels. Arsenic concentrations were determined to be within acceptable standard deviation limits of mean values for statewide arsenic background concentrations. Samples tested for PCBs and OCPs were not detected above laboratory reporting limits. SVOCs were not detected above laboratory reporting limits with the exception of phenol, which was detected in four samples at concentrations well below regulatory action levels. Trace amounts of the VOCs benzene, toluene, xylenes, and/or trichloroethylene (TCE) were detected well below regulatory action levels in three soil samples. Based on the analysis in the Limited Phase II Soil Investigation, soil beneath the site has not been impacted by compounds of potential concern to a depth of eight to ten feet below ground surface (bgs).

Phase I Update Site Reconnaissance

As part of the Phase I ESA Update, a reconnaissance of the project site and nearby vicinity was performed. A discussion of the results of the site survey is provided in Appendix C. In summary, the buildings are currently vacant with the exception of miscellaneous metal, wood, and other trash. Piping (either for fire suppression or associated with the cold storage system) is present on some interior walls. Evidence that the site has been used/occupied by trespassers was visible (e.g., sleeping bags, trash cans full of ashes, graffiti). No RECs that require further investigation were identified on site or in the vicinity.

Phase I Update Database Search

As part of the Phase I ESA Update, an environmental database search was conducted by Environmental Data Resources (EDR) for the project site and surrounding areas within a 1 mile radius. Additionally, local regulatory agency files were reviewed for specific information regarding sites identified in the EDR report that were judged to be of possible concern. Most of the databases did not identify environmental concerns within a 1-mile radius of the project site. For those databases that did identify sites within 1 mile of the project site, because of their location (cross- or down-gradient), distance from the site or regulatory status (no violations or spills reported), most of these were determined not to pose a hazard to the project site. For sites with documented concerns, based on further review of the conditions (i.e., impacts to soil only, potential groundwater contamination that would not impact groundwater beneath the site, potential groundwater contamination that would not be encountered by proposed demolition activities, contamination levels below regulatory limits, regulatory status, distance, and location), it was determined that they did not pose a hazard to the project site from proposed demolition

activities. These sites and relevant conditions are further described in the Phase I ESA provided in Appendix C).

Asbestos and Lead Investigations

On June 4, 2010, Patriot Environmental Laboratory Services performed investigations into the possible presence of asbestos-containing materials (ACM) and lead-based paint (LBP) at the project site. Asbestos, a naturally occurring fibrous material, was used for years in many building materials for its fire-proofing and insulating properties. While the use of asbestos in the manufacture of most building materials has not been fully prohibited by law, the use of asbestos, for the most part, has voluntarily been discontinued since the late 1970s. Loose insulation, ceiling panels, and brittle plaster are potential sources of friable (easily crumbled) asbestos. Nonfriable asbestos is generally bound to other materials such that it does not become airborne under normal conditions. Any activity that involves cutting, grinding, or drilling during demolition can release friable asbestos fibers unless proper precautions are taken. Inhalation of airborne fibers is the primary mode of asbestos entry into the body, which makes friable materials the greatest potential health risk. Asbestos is a known human carcinogen and there is no known threshold level of exposure at which adverse health effects are not anticipated.

Lead is a naturally occurring metallic element. Among its numerous uses and sources, lead can be found in paint; water pipes; solder in plumbing systems; soils around buildings; and structures painted with lead-based paint. In 1978, the Consumer Products Safety Commission banned paint and other surface-coating materials containing lead. Because of its toxic properties, lead is regulated as a hazardous material. Inorganic lead is also regulated as a toxic air contaminant.

For the ACM investigation, 48 physical bulk samples from interior and exterior locations at the site were collected. Samples were taken from rolled roofing material, roof mastic, roof parapet, vapor barrier paper, exterior stucco, drywall, floor mastic, wood fiberboard, and particle board. The following ACMs were identified on site:

- roof penetration mastic;
- vapor barrier paper from exterior walls (concealed by wood siding); and
- remnant flooring mastic from the concrete floor at the entrance to Building 9.

All buildings on site would be demolished as part of the proposed project, thus disturbing known and potential ACMs. Demolition of the buildings could expose demolition personnel to these materials unless proper precautions are taken to minimize exposure. The potential for asbestos release would be considered a significant impact if not properly handled. Because exposure to such materials can result in adverse health effects in uncontrolled situations, several regulations and guidelines pertaining to abatement of and protection from exposure to asbestos have been developed for demolition activities. As described in SC HAZ-1, prior to demolition of the on-site structures, ACMs would be removed and disposed of by qualified contractors. Adherence to applicable requirements discussed in SC HAZ-1 and MM HAZ-1 would reduce potential impacts related to the removal and disposal of ACMs to a level considered less than significant.

For the inspection of LBP, a total of 220 readings were collected from walls, wall coverings, columns, doors, door casings, floors, floor stops, baseboards, staircases, railings, treads, rain gutters, beams, ceilings, fire doors, pipes, cabinets, porch ceilings, trims, rollup door casings, cooling towers, access ladders, roof fields, flashing, and curbs. LBP at concentrations greater

than 1.0 milligrams per square centimeter (mg/cm²) was identified in 19 of the readings. These were identified as the following materials:

- Yellow metal columns in Building 7B;
- Yellow metal columns, yellow and white floor stripes, and white wood wall baseboards in Building 9;
- Yellow wood columns and yellow concrete column bases in Buildings 9A and 9B;
- Bare metal clad fire-rated sliding door in Building 10; yellow concrete column bases and bare metal clad fire-rated sliding door in Building 11;
- Yellow metal columns and yellow metal railing in Building 12;
- Blue wood siding inside electrical room (concealed by newer paneling) in Building 13; and
- Yellow metal columns, gray metal railing, and yellow pipes (on roofs) in exterior locations.

Because exposure to lead dust generated during demolition activities could result in adverse health effects in uncontrolled situations (resulting in a potentially significant impact), several regulations and guidelines pertaining to abatement of and protection from exposure to lead-containing materials have been developed for demolition activities. All LBP should be demolished utilizing “lead safe” containment and work practices. Any contractor who would disturb any lead-laden surfaces should be notified of the investigation findings and the requirement to comply with the California Occupational Safety and Health Agency (CalOSHA) guidelines. Prior to demolition of the on-site structures, lead-containing materials would be removed and disposed of by qualified contractors. Adherence to MM HAZ-2 would reduce potential impacts associated with the removal and disposal of lead-containing materials to a level considered less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. Richman Elementary School, Maple Elementary School, and Fullerton Union High School are located within one-quarter mile of the project site. However, the project involves the demolition of the existing on-site buildings and does not include the development of any other uses that would involve the use, storage, or transport of hazardous materials and would not, therefore, result in hazardous emissions or require the handling of hazardous materials. No impact would result and no mitigation is required.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant. As previously discussed, as part of the Phase I ESA Update, a records search was conducted by EDR to review the databases maintained by various federal and State environmental agencies. Appendix C contains the EDR report. As detailed in the Phase I ESA Update, the EDR review indicates that the project site is listed on the following federal, State, and local regulatory database lists related to operation of the World Citrus facility.

- California Hazardous Materials Incident Response System (CHMIRS), Emergency Response Notification System (ERNS), and Facility Index System (FINDS) listings are

related to ammonia releases at the facility in 1991, 1992, 1993, 1996, 1997, and 2000. These releases occurred as a result of either operator error or equipment malfunctions.

- The leaking underground storage tank (LUST) listing is related to the discovery of gasoline contamination of the soil discovered as a result of underground storage tank (UST) removal in 1990. Mention is also made of diesel contamination and a UST abandoned in place. The status of the LUST case is listed as “case closed” in 1992.
- The Hazardous Materials Information Reporting System (HMIRS) listing is related to a spill of 218 gallons of caustic alkali liquid NOS (nitric oxide synthase), brand name Quorum Yellow, in 1992. Quorum Yellow is a cleaning agent containing potassium hydroxide, pentasodium triphosphate, cocamine oxide, potassium hypochlorite solution, and sodium xylene sulfonate. According to a Material Safety Data Sheet for the substance, there are no hazardous ingredients in quantities requiring reporting.
- The California Waste Discharge System (CA WDS) listing is related to a general waste discharge permit issued by the California Regional Water Quality Control Board for industrial facilities that treat or dispose of liquid waste from any type of producing, manufacturing or processing operation. The facility is not considered to represent a significant threat to water quality on the basis of its discharge.
- The Emissions Inventory Data (EMI) listing relates to an SCAQMD permit issued for the operation of two chilling units at the facility.
- The Facility and Manifest Data (HAZNET) listing is related to waste disposal practices at the site. The site is listed as having transported the following substances off-site for disposal or recycling: unspecified solvent mixture waste; liquids with percent hydrogen (pH) <UN->2; and waste oil and mixed oil. No violations are listed as a result of these activities.
- The Hazardous Waste & Substance Site List (HIST CORTESE) listing is related to the LUST listing, which is described above.
- The UST listing indicates that one or more USTs have been listed as present on the site. Information collected during the Phase I investigation indicates that USTs are no longer present at the site.

It should also be noted that a search of local records revealed that there were listings (summarized in Appendix C) for the project site on file at the Fullerton Fire Department, the Orange County Health Care Agency, the Orange County Sanitary District, and the California Regional Water Quality Control Board. These files include documentation of hazardous materials used at the former World Citrus facility, inspectional reports, incident reports, permits that were held for operations, and other documentation.

Based on the information available on hazardous materials database sites, the project site is listed on several government agency databases related to the on-site storage, generation, and disposal of hazardous materials; discharge of process wastewater; air emissions; and spills of gasoline, caustic alkali liquid, and ammonia to the soils and/or atmosphere. Implementation of the proposed demolition project would not pose hazards to people or the environment related to identified sites. No mitigation is required.

- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?**
- f) **For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?**

No Impact. Fullerton Municipal Airport is approximately three miles west of the project site. The *Airport Environs Land Use Plan (AELUP)* for the Fullerton Municipal Airport was adopted in December 2002 (updated in November 2004) and provides required standards for land uses in the airport vicinity. The AELUP has designated Accident Potential Zones and a Runway Protection Zone around the airport to enforce safety standards. The project site is not located within either of these zones. The Orange County Airport Land Use Commission (ALUC) uses Federal Aviation Regulations (FAR) Part 77 entitled "Objects Affecting Navigable Airspace" for establishing building height restriction standards. The project site is not within the Fullerton Airport Obstruction Imaginary Surface area as defined in FAR Part 77. Additionally, the project would not involve the development of any structures. Therefore, the proposed project does not pose an adverse aeronautical effect and no mitigation is required.

- g) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

No Impact. The proposed project involves demolition activities that would last four to six weeks. As described under Item XVI, Transportation and Traffic, the proposed project would not result in a significant impact to existing roadways during demolition activities; therefore, it would neither interfere with nor impact the implementation of the City's existing emergency response or evacuation plans. No impact would occur and mitigation is not required.

- h) **Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

No Impact. The project site is located in an urban area of the City of Fullerton and is not adjacent to wildlands. Therefore would not result in a significant risk of loss, injury, or death involving wildland fires. No mitigation is required.

Mitigation Program

Standard Conditions and Requirements

- SC HAZ-1** Demolition shall be conducted in accordance with the remediation and mitigation procedures established by all federal, State, and local standards including the federal and State Occupation Safety and Health Administrations (OSHA and CalOSHA) and South Coast Air Quality Management District (SCAQMD) regulations for the excavation, removal, and proper disposal of the asbestos-containing materials (SCAQMD Regulation X – National Emission Standards For Hazardous Air Pollutants, Subpart M – National Emission Standards For Asbestos). The materials shall be disposed of at a certified asbestos landfill. The Asbestos-abatement Contractor shall comply with notification and asbestos-removal procedures outlined in SCAQMD Rule 1403 to reduce asbestos-related health risks. SCAQMD Rule 1403 applies to any demolition or renovation activity and the associated disturbance of asbestos-containing materials. These requirements shall be included on the

contractor specifications and verified by the City of Fullerton's Community Development Department in conjunction with the issuance of a Demolition Permit.

Mitigation Measures

MM HAZ-1 Prior to commencement of any activities with the potential to disturb ACMs, the Applicant shall retain a certified Asbestos-abatement Contractor to abate the ACMs in accordance with all applicable regulations, including California Occupational Safety and Health Administration (CalOSHA) guidelines and South Coast Air Quality Management District Rule 1403 (refer to SC HAZ-1).

MM HAZ-2 Contractors shall comply with the requirements of Title 8 of the *California Code of Regulations* Section 1532.1, which provides for exposure limits, exposure monitoring, respiratory protection, and good working practice by workers exposed to lead. Lead-contaminated debris and other wastes shall be managed and disposed of in accordance with the applicable provision of *the California Health and Safety Code*.

IX. HYDROLOGY AND WATER QUALITY

Would the project:

- a) Violate any water quality standards or waste discharge requirements?**
- f) Otherwise substantially degrade water quality?**

Less Than Significant Impact. The project is subject to requirements of the 1972 Federal Water Pollution Control Act, subsequently known as the Clean Water Act (CWA). In 1972, the CWA was amended to require National Pollutant Discharge Elimination System (NPDES) permits for the discharge of pollutants to "Waters of the U.S." from any point source. In 1987, the CWA was amended to require that the U.S. Environmental Protection Agency (USEPA) establish regulations for municipal and industrial storm water discharges for permitting under the NPDES permit program. The regulations require that municipal separate storm sewer system (MS4) discharges to surface waters be regulated by an NPDES permit. The MS4s are designated or used for collecting or conveying storm water (i.e., not wastewater or combined sewage).

Pursuant to Clean Water Act (CWA) Section 402(p), which requires regulations for permitting of certain storm water discharges, the State Water Resources Control Board (SWRCB) has issued the statewide NPDES General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities, Order No 2009-009-DWQ, NPDES No. CAS000002, adopted by the SWRCB on September 2, 2009, effective for all project sites on July 1, 2010. Under this Construction General Permit, individual NPDES permits or Construction General Permit coverage must be obtained for discharges of storm water from construction sites with a disturbed area of one or more acres and are required to either obtain individual NPDES permits for storm water discharges or be covered by the Construction General Permit. Coverage under the Construction General Permit is accomplished by completing and filing a Notice of Intent (NOI) with the SWRCB. Each applicant under the Construction General Permit must ensure that a Storm Water Pollution Prevention Program (SWPPP) is prepared prior to grading and is implemented during construction. The primary objective of the SWPPP is to identify, construct, implement, and maintain Best Management Practices (BMPs) to reduce or eliminate,

pollutants from the construction site during construction in storm water discharges and authorized non-storm water discharge.

The City of Fullerton falls within the jurisdiction of the Santa Ana RWQCB (Region 8) and is therefore subject to the fourth-term General MS4 Permit, Order No. R8-2009-0030; NPDES No. CAS618030, adopted May 22, 2009. As a Co-Permittee under the General MS4 permit, the City of Fullerton has the authority to enforce the terms of the permit for the proposed project. This permit governs storm water and urban runoff discharges to public storm drain systems owned and operated by the northern Orange County cities (collectively “the Co-Permittees”). This permit also specifies requirements for managing runoff water quality from new development and significant redevelopment projects, including specific sizing criteria for treatment BMPs.

The 2003 Drainage Area Management Plan (DAMP) was developed by the Co-Permittees to implement the requirements of the General MS4 Permit. The DAMP provides a framework and a process for following the General MS4 Permit requirements and incorporates watershed protection/storm water quality management principles into the Co-Permittees’ General Plan process, environmental review process, and development permit approval process. The DAMP includes a Model Water Quality Management Plan (WQMP) that defines requirements and provides guidance for complying with the NPDES permit regulations for project-specific planning, selection, and design of BMPs in new development or significant redevelopment projects.

Currently, the Co-Permittees are working collectively to revise the DAMP and the Model WQMP, as necessary, to support the fourth-term General MS4 Permit, Order No. R8-2009-0030. From the time this permit was adopted (May 2009), the Co-permittees were given 12 months to revise the DAMP. After the 12-month re-work period, another 3-month window was reserved for projects that were previously under development and had completed a WQMP to proceed under the BMP treatment regulations set forth under the previous permit (i.e., Order No. R8-2002-0010). It should be noted that as of the preparation of this Initial Study, the Co-Permittees are continuing preparation of the revised DAMP and Model WQMP (the 12-month period for this effort has been exceeded).

In compliance with the NPDES program and the DAMP, the City of Fullerton has adopted a Water Quality Ordinance (*Fullerton Municipal Code*, Chapter 12.18) requiring that all construction projects, development, and significant redevelopment projects incorporate BMPs into a project’s design and/or implementation. This is done in an attempt to reduce the amount of pollutants introduced into the storm water drainage system, which connects to local streams, rivers, and eventually the ocean. In January 2004, the City adopted *Water Pollution Control Guidelines* for the preparation of required WQMPs and SWPPPs.

Short-Term Construction-Related Water Quality Impacts

The proposed project could result in short-term impacts to surface water quality from demolition activities. Storm water runoff from the project site during demolition could contain debris and sediments from these activities. Spills or leaks from heavy equipment and machinery, construction staging areas, or building sites can also enter runoff and typically include petroleum products such as fuel, oil and grease, and heavy metals. Compliance with the NPDES Construction General Permit as discussed above and the preparation and implementation of a SWPPP would ensure that any impacts to downstream waters resulting from demolition activities associated with the project site would be less than significant. Erosion-control BMPs would be implemented per NPDES requirements. Compliance with applicable local, State, and federal regulations would reduce water quality impacts associated with construction to a less than significant level (SC WQ-1).

Long-Term Water Quality Impacts

Currently, all surface runoff from the site, which is developed with vacant buildings and impervious surfaces, enters a clarifier and then enters the public storm drain system or sewer system. Because no development is proposed, the type of pollutants generated from the site with the proposed project would be limited. Typical urban pollutants such as trash/debris that enter the site from adjacent areas could enter the public storm drain system or sewer system after demolition activities occur. As part of the proposed project, and described in Section 2.3, Project Description, erosion control measures would be implemented to control debris from the project site after demolition activities are completed. Because the project involves demolition of the existing buildings and no grading or excavation activities would occur as part of the proposed project, no soils would be exposed. As such, this project is not a priority or non-priority project based on the DAMP; therefore, a WQMP is not required (Phan 2010). Long-term water quality impacts would be less than significant.

Compliance with local, State, and federal water quality regulations and implementation of erosion control measures proposed with the project would result in less than significant construction-related and long-term water quality impacts. No mitigation measures are required.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

No Impact. The project consists of the demolition of the existing buildings on site. No grading or excavation activities would occur within the proposed project. Above-grade demolition activities would not encounter groundwater. Domestic water service to the proposed project would not be necessary. Therefore, the proposed project would not deplete groundwater supplies or interfere substantially with groundwater recharge. No mitigation is required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

No Impact. The project site is currently developed and there are no streams or rivers within or in proximity to the project site. Similar to existing conditions, following completion of the proposed demolition activities, the project site would consist entirely of impervious surfaces and the project would not substantially alter or reduce the amount or rate of runoff. The proposed project would not result in flooding on or off site. There would not be exposed soil after demolition of the existing buildings and the proposed project would not result in an increase in the amount of erosion or sedimentation after demolition is complete (potential water quality impacts were previously discussed under Items a and f, above). The proposed project would not substantially alter existing drainage patterns or change the course of any streams or rivers. No significant impacts would result and no mitigation is required.

e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

No Impact. As noted above, the proposed project would not substantially alter the amount of runoff from the site or affect the volume of storm water runoff entering existing storm drain systems. Additionally, implementation of erosion control measures proposed as part of the project (refer to PDF WQ-1) would ensure that pollutants generated from the vacant project site would not significantly impact storm water flows. Therefore, impacts related to storm water flow would be less than significant, and no mitigation is required.

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

j) Inundation by seiche, tsunami, or mudflow?

No Impact. The project site is not located in an area identified as a 100-year flood hazard area (*City of Fullerton General Plan*, Exhibit CHS-1, Public Safety Map), and would not expose people or structures to flooding (Fullerton 1996). There are no water bodies in proximity to the project site that would subject the site to hazards from a seiche or tsunami. There are no hillside areas within the project vicinity that would generate mudflow. Additionally, the project does not propose construction of any habitable structures and would not expose people or structures to a significant risk of loss, injury, or death involving flooding. As a result, no impacts would occur and no mitigation is required.

Mitigation Program

Project Design Features

PDF WQ-1 As shown in Exhibit 2-5, in Section 2, Project Description, the proposed project includes the installation of measures to control erosion from the vacant project site after completion of demolition activities. The Erosion Control Plan includes the following:

- Installation of four 8-foot by 10-foot track clean rattle plates by trench shoring. These would be located on the project site along Santa Fe Avenue.
- Installation of gravel bag velocity reducers at several locations as shown on Exhibit 2-5.
- Installation of catch basin protection.
- Installation of a silt fence and screen curtain as needed for wind erosion and dust control.
- Connection of the existing pump to an electrical line and addition of an automatic turn-on switch.

- Installation of sand/gravel bags throughout the site to direct water flow from building slabs to appropriate locations. The location for these bags shall be determined based on site conditions following demolition.

Pursuant to the Erosion Control Plan (Exhibit 2-5):

- Erosion control devices shall not be moved or modified without the approval of the Building Official.
- All removable erosion-protective devices shall be in place at the end of each working day when the 5-day rain probability forecast exceeds 40 percent.
- After a rainstorm, all silt and debris shall be removed from streets.
- Graded areas on the permitted area perimeter shall drain away from the face of slopes at the conclusion of each working day. Drainage shall be directed towards desilting facilities.

Standard Conditions and Requirements

SC WQ-1 Prior to the issuance of a demolition permit, the Applicant shall file a Permit Registration Document (PRD) with the SWRCB in order to obtain coverage under California's General Permit for Storm Water Discharges Associated with Construction Activity (NPDES No. CAS000002 or the latest approved general permit), which was approved on September 2, 2009. The Applicant shall provide documentation of coverage under the Construction General Permit to the City of Fullerton Community Development Department. The PRD consists of a Notice of Intent (NOI); Risk Assessment; Site Map; SWPPP; annual fee; and a signed certification statement. Pursuant to the permit requirements, the Property Owner/Developer shall develop and incorporate BMPs for reducing or eliminating construction-related pollutants in the site runoff.

X. LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

No Impact. As shown in the aerial photograph provided in Exhibit 2-2, the project site is currently developed with industrial uses. The project site is bordered to the south by railroad tracks and industrial uses; residential uses are located farther to the south across Walnut Avenue. There are several restaurant/bars, single-family residences, and industrial uses and public parking in the area to the north of the project site. Amerige Park and commercial uses are located west of the project site across Highland Avenue. The remainder of the World Citrus facility, including industrial buildings, is located immediately to the east. The proposed project involves the demolition of the existing buildings on site and would not disrupt the physical arrangement of an established community. No impact would occur and no mitigation is required.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The *City of Fullerton General Plan* was adopted in 1996 and has subsequently been revised to reflect adopted General Plan Amendments. The current General Plan's land use designation for the project site is Industrial and the zoning designation is M-G (Manufacturing, General). The land use designations for areas surrounding the project site are Commercial, Industrial, Downtown Mixed-Use, and Governmental Facilities. The zoning designations for areas surrounding the project site are Industrial and Commercial. The proposed project involves the demolition of the existing buildings and would not require a change to the land use or zoning designations for the site.

The proposed project involves the demolition of eight buildings that are currently vacant and in disrepair; there are no plans for future development of the site. Based on review of the City's General Plan, implementation of the proposed project would not conflict with the City's General Plan land use-related goals and policies. Notably, Goal LU-2 addresses compatible and balanced land uses that are well maintained or revitalized, provide pleasant environments, and adequately serve present and future populations. While the project does not include development plans, it does not preclude future development of the site and it would not interfere with the City's long-range vision for the South of Commonwealth (SOCO) area. Therefore, no impacts would result and no mitigation is required.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. The proposed project is not within the boundaries of an adopted habitat conservation plan or natural community conservation plan. There would be no impact and no mitigation is required.

XI. MINERAL RESOURCES

Would the project:

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**
- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

No Impact. According to the Resource Management Element of the City's General Plan, the City of Fullerton does not contain known State or locally designated mineral resources or locally important mineral resource recovery sites (Fullerton 1996). Implementation of the proposed project would not result in adverse impacts to any significant mineral resource. No mitigation is required.

XII. NOISE

Would the project result in:

- a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

- c) **A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**
- d) **A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

Less Than Significant Impact. The existing noise environment in the vicinity of the proposed project is dominated by automobile traffic on Highland Avenue, Santa Fe Avenue, and Malden Avenue and train traffic to the south.

As outlined in the City's Noise Ordinance, the following noise standards apply to impacts on residential land uses: interior noise levels are not to exceed 55 A-weighted decibels (dBA) from 7:00 AM to 10:00 PM, and 45 dBA from 10:00 PM to 7:00 AM. Exterior noise levels are not to exceed 55 dBA from 7:00 AM to 10:00 PM, and 50 dBA from 10:00 PM to 7:00 AM. The City's Noise Ordinance specifically excludes noise associated with construction, repair, remodeling, or grading of any real property provided it takes place between the hours of 7:00 AM and 8:00 PM on any day except Sunday or a City-recognized holiday.

Demolition activities associated with the proposed project are planned to begin in September 2010 and are expected to occur over a four- to six-week period. It is estimated that a total of 2,067 cubic yards of brick and debris would be exported off site. During the demolition activity, trucks are expected to enter and leave the site on a regular basis, but only during working hours. Brick and debris removal from the site would generate an estimated 208 one-way truck trips. The number of truck trips traveling along the designated haul routes would vary daily depending on the nature of the activity; however, it is estimated that there would be approximately ten one-way truck trips per work day during the four- to six-week demolition period. During demolition activities, trucks are expected to enter and leave the site from Santa Fe Avenue and would follow City-designated haul routes and avoid residential streets. Trucks are anticipated to access the project site primarily via SR-91 and larger arterials (e.g., Harbor Boulevard). Although noise from each truck that passes by would be noticeable, project-related truck traffic would not be a substantial percentage of the daily volumes, and would not significantly increase noise levels for uses adjacent to Santa Fe Avenue and other roads in the vicinity of the project site.

During demolition of the existing structures, the immediate vicinity would experience short-term noise impacts related to the operation of heavy construction equipment such as dump trucks. Noise levels would fluctuate depending on equipment type, duration of use, and distance between noise source and listener. The operation of heavy equipment may occur as close as 70 feet to the homes to the north of the site across Santa Fe Avenue. Noise from localized point sources, such as construction equipment, decreases by approximately 6 dBA with each doubling of distance from the source to receptor. The loudest noise would be from heavy construction equipment, such as dump trucks, that can reach maximum noise levels (L_{max}) of up to 85 dBA at 50 feet. Assuming the simultaneous operation of a bulldozer and a dump truck, the combined maximum short-term noise level at the nearest residential structure may reach levels of up to 83 dBA L_{max} .

Noise would be noticeable during the operation of heavy construction equipment working at the site (sporadically over the duration of demolition activities). Existing noise-sensitive uses surrounding the project site would be exposed to increased noise from construction activities on site. The contractor would be required to comply with Section 15.90 of the City's Municipal Code, which sets forth noise regulations prescribing the hours allowed for construction activity as reflected in SC N-1 below. Therefore, project-related construction noise impacts would be less than significant. Demolition noise would be of short duration. There would not be any long-

term noise impacts from the project site to the surrounding area. No significant long-term impacts would result and no mitigation is required.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. The nearest vibration-sensitive structures are the single-family homes approximately 70 feet north of Santa Fe Avenue. Demolition activities may result in varying degrees of ground vibration depending on the equipment and methods used, distance to the affected structures, and the soil type. Occasionally, large bulldozers and loaded trucks can cause perceptible vibration levels at close proximity on the order of 25 feet. Since demolition of existing structures would not utilize explosives, and due to distance to the nearest vibration-sensitive receivers, the vibration impacts to land uses near the project site during construction would be less than significant and no mitigation is required.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The project site is located approximately three miles east of the Fullerton Municipal Airport. The project is not located within an airport land use plan or within two miles of a public airport. In addition, the project site is not in the vicinity of a private airstrip; therefore, no noise impacts related to public airports or private airstrip operations would occur.

Mitigation Program

Standard Conditions and Requirements

SC N-1 Consistent with City of Fullerton Noise Ordinance, noise-generating project construction activities shall be limited to between the hours of 7:00 AM and 8:00 PM except on Sunday or a City-recognized holiday. The City Building Official shall be responsible for ensuring that the contractor complies with these requirements.

XIII. POPULATION AND HOUSING

Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. The project site is fully developed with industrial buildings that have been vacant for several years. The proposed project would result in the demolition of these buildings and no new development is proposed. Therefore, the proposed project would not generate new population growth. In addition, no infrastructure expansion would be required that could indirectly induce population growth in the area. No significant impacts are anticipated and no mitigation measures are required.

- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**
- c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

No Impact. The proposed project would result in the demolition of industrial buildings and would not displace existing housing or people. The project would not require the construction of replacement housing elsewhere. The proposed project would not result in any impacts related to Population and Housing and no mitigation is required.

XIV. PUBLIC SERVICES

- a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:**

- i) Fire protection?**
- ii) Police protection?**
- iii) Schools?**
- iv) Parks?**
- v) Other public facilities?**

No Impact. The proposed project involves demolition of existing buildings and above-grade associated building facilities on the project site. No new demand for public services such as schools, fire protection, public safety, libraries, or other services would occur. Following the completion of demolition activities, the project site would remain vacant and undeveloped. No development, including residential uses which would generate new population in the City, is proposed. No impact would occur, and no mitigation is required.

XV. RECREATION

- a) Would the proposed project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**
- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?**

No Impact. As stated in Item XIV, Public Services, above, the proposed demolition project would not result in the increase of the resident population, thereby increasing the use of, or require the construction or expansion of, City parks or recreational facilities. No significant project-related impacts to recreation would occur and no mitigation is required.

XVI. TRANSPORTATION/TRAFFIC

Would the project:

- a) ***Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system. Including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?***
- b) ***Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand established by the county congestion management agency for designated roads or highways?***

Less Than Significant Impact. Implementation of the proposed project would generate temporary vehicle trips associated with demolition activities. Demolition activities associated with the proposed project are expected to occur over a four- to six-week period. As previously described, during the four- to six-week demolition period, an average of ten one-way truck trips per day are expected to be generated.

Construction-related traffic is anticipated to access the project site primarily via SR-91 and larger arterials (e.g., Harbor Boulevard) along commercial corridors avoiding residential neighborhoods, as feasible. Construction-related traffic would comply with the City's weight limits for vehicles, including commercial vehicles (refer to SC TRF-1) and would utilize the existing regional and local road network consistent with the City's approved truck routes at the time of construction (refer to SC TRF-2). In May 2010, the City of Fullerton Transportation & Circulation Commission approved the addition of a new section to the City's Municipal Code (Section 8.30, Truck Routes and Terminals), which identifies designated truck routes; this amendment to the Municipal Code will be considered by the City Council in August 2010.

Due to the small amount of construction-generated traffic, the short-term nature of the demolition project and compliance with the City's requirements related to commercial vehicles (including use of approved truck routes), the temporary increase in construction traffic would not significantly impact roadway operations and would result in a less than significant impact. However, to facilitate the movement of construction traffic and minimize potential disruptions, a construction traffic management plan would be prepared and followed during construction (refer to MM TRF-1). In addition, because the proposed demolition project would contribute a small amount of construction-generated traffic (approximately ten one-way truck trips per day), it would not conflict with applicable congestion management plans, ordinances, or policies related to the circulation system.

The proposed project would not result in any long-term impacts, as the site would remain vacant and undeveloped under the proposed project.

- c) ***Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?***

No Impact. The proposed project would involve removal of existing buildings and would not include the development of any new uses. There would be no change in air traffic patterns, and the project would not increase the amount of air traffic. There would be no impact and no mitigation is required.

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?

No Impact. The proposed project involves the demolition of the existing buildings on site and would maintain existing circulation patterns. The project does not include any uses or design features that would increase hazards. The proposed project would not interfere with access or activities at the surrounding land uses. There would be no impact and no mitigation is required.

e) Result in inadequate emergency access?

No Impact. The proposed project would result in the demolition of the existing on-site structures. A new double-wide gate would be installed to allow access to the site from Santa Fe Avenue. No new development is proposed as part of the proposed project. There would be no impact related to emergency access and no mitigation is required.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decreased the performance or safety of such facilities?

No Impact. The proposed project would result in the demolition of the existing on-site structures; no development is proposed as part of the proposed project. Demolition activities would occur on site and would not impact daily railroad operations. There are existing sidewalks along the northern and southern sides of Santa Fe Avenue, and proposed demolition activities would not preclude pedestrians and cyclists from traveling along Santa Fe Avenue. However, as identified in MM TRF-1, temporary routes for pedestrians and bicyclists to avoid demolition activities would be identified. This would involve directing pedestrians and bicyclists to use the northern side of Santa Fe Avenue. The proposed project would neither create conflicts with adopted policies supporting alternative transportation, nor is the project a major employment center requiring the incorporation of alternative transportation facilities. There would be no impact and no mitigation is required.

Mitigation Program

Standards Conditions and Requirements

SC TRF-1 In accordance with Chapter 8.28, Weight Limits, of the *City of Fullerton Municipal Code*, contractors shall not operate any vehicles, including commercial vehicles, that exceed the weight limit established by the City for individual streets (as posted on signs). Commercial vehicles may use restricted streets for the purpose of delivering or picking up materials or merchandise by entering a restricted use street at its intersection with an unrestricted street nearest to the destination, then proceeding by the most direct route to such destination, and then traveling directly to the nearest unrestricted street.

SC TRF-2 In accordance with Chapter 8.30, Truck Routes and Terminals, of the *City of Fullerton Municipal Code*, construction vehicles exceeding 10,000 pounds shall use designated truck routes to access construction sites. Non-designated truck routes shall be used only as necessary to traverse a street or streets to a destination for the purpose of loading or unloading.

Mitigation Measures

Although no significant impacts have been identified, the following mitigation is required.

MM TRF-1 Prior to issuance of a demolition permit, the Applicant shall submit a Construction Traffic Management Plan (Plan) to the City of Fullerton Engineering Department for review and approval. The Plan shall include, but not be limited to (1) identification of construction haul routes that follow the City's approved truck routes and avoid residential streets; (2) identification of emergency access points/routes; (3) duration and location of lane closures (if any); (4) location of parking for the public and construction workers during demolition; (5) use of flagmen; and (6) temporary routes for pedestrians and bicyclists to avoid demolition activities. The Plan shall be implemented during demolition activities. The contractor specifications shall include the requirements outlined in the Plan and this shall be verified by the City Engineering Department.

XVII. UTILITIES AND SERVICE SYSTEMS

- a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**
- b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**
- e) Result in a determination by the wastewater treatment provider which services or may serve the project that has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

No Impact. The project site has been vacant since 2006 and the only operational building on site is the modular building utilized as a guard post. There is no existing wastewater generation from the project site. The proposed project would result in the demolition of the existing on-site structures; no new development is proposed. No wastewater would be generated from the project site after demolition of existing buildings since there would be no operational uses. Therefore, the project would not require the construction of new wastewater treatment facilities, and no significant environmental effects would occur. No mitigation is required.

- c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

No Impact. The proposed project would not include any development or other uses that would require the construction of new storm water drainage facilities. As previously addressed, the amount of runoff from the project site would not increase since the amount of impervious surface would not be different compared to the current conditions. The project would not require the expansion of existing facilities. No significant environmental impacts would occur and no mitigation is required.

- d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

No Impact. The City of Fullerton provides water service to the project site. The proposed project would result in the demolition of the existing on-site structures; no development is proposed.

Therefore, the project would not necessitate a need for long-term water resources. No impact would occur and no mitigation is required.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

g) Comply with federal, state, and local statutes and regulations related to solid waste?

Less than Significant Impact. Solid waste generated from the proposed project site would most likely be disposed at the Olinda Alpha Landfill (the closest landfill to the site), which is part of the Orange County landfill system operated by OC Waste & Recycling. The landfill currently accepts a maximum of 8,000 tons per day (tpd), and the remaining air space capacity is approximately 36 million cubic yards. Closure of the landfill is currently planned for 2021 (OC Waste & Recycling 2010).

Demolition of the proposed project would generate an estimated 2,067 cubic yards of brick and debris to be removed from the site. On-site materials would be processed into aggregate base to reduce excavation and hauling off site. In order to comply with the State of California Waste Management Act (AB 939), the City of Fullerton has implemented a recycling program. This program processes solid waste at a Materials Recovery Facility (MRF) to ensure that recyclable items are removed from solid waste flows, which are sent to the landfill system. In accordance with the City's Municipal Code Section 5.15.50, Diversion Requirements, the Applicant is required to divert 50 percent of demolition debris generated at the project site from landfills by recycling, reuse, and diversion programs (refer to SC Util-1). Even without recycling efforts, the solid waste generated from the demolition project could be accommodated within the permitted capacity of the County's landfill system (Arnau 2010). No significant impacts would occur and no mitigation is required.

Because the project site would remain vacant and undeveloped, the project would not generate operational solid waste.

Mitigation Program

Standard Conditions and Requirements

SC Util-1 Pursuant to Section 5.15.50, Diversion Requirements, of the *Fullerton Municipal Code*, the Project Applicant shall divert 50 percent of demolition debris generated from the demolition project from landfills by recycling, reuse, and diversion programs.

XIV. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

No Impact. There are no sensitive biological resources, habitat, or species located on the project site that would be affected by the proposed project. Additionally, there are no historic resources on the project site that would be impacted by implementation of the proposed project. No impact would result and no mitigation is required.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ('Cumulatively considerable' means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

No Impact. For the majority of the impact categories, the proposed demolition project would have no impact. Potential impacts have been determined to be less than significant or mitigated to a level considered less than significant. The project would not result in impacts that are cumulatively considerable.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. The proposed project involves the demolition of existing structures and does not propose any new development. Compliance with identified SCs and implementation of identified MMs would ensure that potential impacts that have been identified related to air quality, noise, and water quality would be less than significant. The proposed project would not cause substantial adverse effects on human beings, either directly or indirectly.

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