

6. Significant Unavoidable Adverse Impacts

A table at the end of Chapter 1, *Executive Summary*, summarizes the impacts, mitigation measures, and levels of significance before and after mitigation. Mitigation measures would reduce the level of impact, but the following impacts would remain significant, unavoidable, and adverse after mitigation measures are applied.

6.1 AIR QUALITY

Impact 5.2-1

Components of and improvements proposed under the Proposed Project would contribute to minimizing criteria air pollutant emissions from transportation and energy use. In addition, mitigation measures applied for Impact 5.2-3 would further reduce the project's regional operational phase criteria air pollutant emissions to the extent feasible. However, given the potential increase in growth and associated increase in criteria air pollutant emissions, the project would continue to be potentially inconsistent with the assumptions in the air quality management plan. Therefore, Impact 5.2-1 would remain significant and unavoidable.

Impact 5.2-2

Buildout of the Proposed Project would occur over a period of approximately 17 to 18 years or longer. Construction activities associated with buildout of the proposed Specific Plan could generate short-term emissions that exceed the South Coast Air Quality Management District's (SCAQMD) significance thresholds during this time and cumulatively contribute to the nonattainment designations of the South Coast Air Basin (SoCAB). Implementation of Mitigation Measures AQ-1 to AQ-4 would reduce criteria air pollutant emissions from construction-related activities to the extent feasible. However, construction time frames and equipment for individual site-specific projects are not available, and there is a potential for multiple developments to be constructed at any one time, resulting in significant construction-related emissions. Therefore, despite adherence to Mitigation Measures AQ-1 to AQ-4, Impact 5.2-2 would remain significant and unavoidable.

Impact 5.2-3

Buildout in accordance with the Proposed Project would generate long-term emissions that would exceed SCAQMD's regional significance thresholds and cumulatively contribute to the nonattainment designations of the SoCAB. Mitigation Measure AQ-5 would contribute to reducing criteria air pollutant emissions from stationary sources; Mitigation Measures AQ-6, AQ-7, and Mitigation Measures T-1 through T-3 would contribute to reducing mobile-source criteria air pollutant emissions to the extent feasible. However, due to the magnitude of emissions generated by residential, office, and commercial land uses, no mitigation measures are available that would reduce impacts below SCAQMD's thresholds. Therefore, Impact 5.2-3 would remain significant and unavoidable.

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Impact 5.2-5

Mitigation Measures AQ-1 to AQ-4 (applied for Impact 5.2-2) would reduce the proposed Specific Plan's regional construction emissions and therefore, also result in a reduction of localized construction-related criteria air pollutant and TACs emissions to the extent feasible. In addition, Mitigation Measures AQ-8 would contribute to reducing localized construction-related fugitive emissions. However, because existing sensitive receptors may be close to project-related construction activities, construction emissions generated by individual development projects have the potential to exceed SCAQMD's localized significance thresholds and health risk thresholds. Furthermore, because of the scale of development activity associated with buildout of the Proposed Project, it is not possible to determine whether the scale and phasing of individual development projects would result in the exceedance of the localized emissions thresholds and cancer risk and contribute to known health effects. Therefore, Impact 5.2-5, regarding construction-related localized impacts associated with buildout of the proposed Specific Plan, would remain significant and unavoidable.

6.2 GREENHOUSE GAS EMISSIONS

Impact 5.5-1

Incorporation of Mitigation Measures AQ-6 through AQ-7 would encourage and accommodate use of alternative-fueled vehicles and nonmotorized transportation and ensure that mobile-source greenhouse gas (GHG) emissions from the buildout of the Proposed Project would be minimized. Mitigation Measures T-1 through T-3 would contribute in reducing vehicle miles traveled. In addition, Mitigation Measure AQ-5 would contribute in minimizing GHG emissions from the energy sector. However, additional federal, state, and local measures would be necessary to reduce GHG emissions under the Proposed Project to meet the long-term GHG reduction goals under Executive Order S 03 05 and Senate Bill 32. While the emissions per service population would improve with implementation of the Proposed Project—from the current 6.80 metric tons of carbon dioxide-equivalent per service population (MTCO_{2e}/SP) down to 4.53 MTCO_{2e}/SP—it would exceed the forecast year 2035 efficiency target of 2.4 MTCO_{2e}/SP. Since no additional statewide measures are currently available, Impact 5.5 1 would remain significant and unavoidable.

6.3 TRANSPORTATION AND TRAFFIC

Impact 5.13-1

Implementation of Mitigation Measures T-1 through T-7 would reduce impacts to all intersections and segments to operate at acceptable levels of service. However, as discussed below, not all recommended improvements may be feasible due to right-of-way constraints, inconsistency with the goals and policies of the BBSP to provide a pedestrian-friendly environment, or are not guaranteed to be implemented due to jurisdictional constraints. Inasmuch as the primary responsibility for approving and/or completing certain improvements outside of Anaheim lies with agencies other than the City of Anaheim (i.e., cities of Buena Park and Stanton, or Caltrans), there is the potential that significant impacts may not be fully mitigated if such improvements are not completed for reasons beyond the City of Anaheim's control (e.g., the City of Anaheim cannot undertake or require improvements outside of Anaheim's jurisdiction). The City of

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Anaheim cannot guarantee implementation of recommended improvements at the following intersections and arterial segments.

Intersections:

- Beach Boulevard & Lincoln Avenue (Caltrans intersection, mitigation is feasible)
- Beach Boulevard & Orange Avenue (Caltrans intersection, mitigation infeasible)
- Beach Boulevard & Ball Road (Caltrans intersection, mitigation infeasible)
- Beach Boulevard & Cerritos Avenue (Caltrans and Stanton intersection, mitigation infeasible)
- Beach Boulevard & Katella Avenue (Caltrans and Stanton intersection, mitigation infeasible)

Roadway Segments:

- Beach Boulevard between Crescent Avenue and Lincoln Avenue (Caltrans segment, mitigation infeasible)
- Beach Boulevard between Lincoln Avenue and Orange Avenue (Caltrans segment, mitigation infeasible)
- Beach Boulevard between Orange Avenue and Ball Road (Caltrans segment, mitigation infeasible)
- Beach Boulevard between Ball Road and Cerritos Avenue (Caltrans segment, mitigation infeasible)

Therefore, Impact 5.13-1 would remain significant and unavoidable.

Caltrans Facilities

State highway facilities within the study area are not within the jurisdiction of the City of Anaheim. Rather, those improvements are planned, funded, and constructed by the State of California through a legislative and political process involving the State Legislature; the California Transportation Commission (CTC); the California Business, Transportation, and Housing Agency; the California Department of Transportation (Caltrans); and OCTA. Recent funding opportunities designated by OCTA's Renewed Measure M provide the vehicle for designated improvements on the freeway facilities within the study area and were analyzed at their recommended build-out in the BBSP.

While potential impacts to the freeway mainline segments and ramps have been evaluated, implementation of the transportation improvements to Caltrans facilities listed above is the primary responsibility of Caltrans. While Caltrans has recognized that private development has a role to play in funding fair share improvements to impacts on the SR-91 and SR-39, neither Caltrans nor the State has adopted a program that can ensure that locally-contributed impact fees will be tied to improvements to freeway mainlines and only Caltrans has jurisdiction over mainline improvements. Because Caltrans has exclusive control over state highway improvements, ensuring that developer fair share contributions to mainline improvements are actually part of a program tied to implementation of mitigation is within the jurisdiction of Caltrans. However, a number of programs are in place in Orange County to improve and upgrade the regional transportation system. These include the Transportation Corridor Agencies (TCA) Corridor program, the State Transportation Improvement Program (STIP), Caltrans Traffic Operations Strategies (TOPS), State Highway Operation and Protection Program (SHOPP), and the OCTA Measure M program. State and federal fuel taxes generate

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most of the funds used to pay for these improvements. Funds expected to be available for transportation improvements are identified through a Fund Estimate prepared by Caltrans and adopted by the California Transportation Commission (CTC). These funds, along with other fund sources, are deposited in the State Highway Account to be programmed and allocated to specific project improvements in both the STIP and SHOPP by the CTC. However, if these programs are not implemented by the agencies with the responsibility to do so, the project's freeway ramp and mainline impacts would remain significant and unmitigated.

Impact 5.13-2

Implementation of Mitigation Measures T-1 through T-7 would reduce impacts to all intersections and segments to operate at acceptable levels of service. However, as discussed below, not all recommended improvements may be feasible due to right-of-way constraints, inconsistency with the goals and policies of the BBSP to provide a pedestrian-friendly environment, or are not guaranteed to be implemented due to jurisdictional constraints. Inasmuch as the primary responsibility for approving and/or completing certain improvements outside of Anaheim lies with agencies other than the City of Anaheim (i.e., cities of Buena Park and Stanton, or Caltrans), there is the potential that significant impacts may not be fully mitigated if such improvements are not completed for reasons beyond the City of Anaheim's control (e.g., the City of Anaheim cannot undertake or require improvements outside of Anaheim's jurisdiction). The City of Anaheim cannot guarantee implementation of recommended improvements at the following intersections and arterial segments.

Intersections:

- Beach Boulevard & Lincoln Avenue (Caltrans intersection, mitigation is feasible)
- Beach Boulevard & Orange Avenue (Caltrans intersection, mitigation infeasible)
- Beach Boulevard & Ball Road (Caltrans intersection, mitigation infeasible)
- Beach Boulevard & Katella Avenue (Caltrans and Stanton intersection, mitigation infeasible)
- Knott Avenue & Lincoln Avenue (Anaheim and Stanton intersection, mitigation infeasible)

Roadway Segments:

- Beach Boulevard between Crescent Avenue and Lincoln Avenue (Caltrans segment, mitigation infeasible)
- Beach Boulevard between Lincoln Avenue and Orange Avenue (Caltrans segment, mitigation infeasible)
- Beach Boulevard between Orange Avenue and Ball Road (Caltrans segment, mitigation infeasible)
- Beach Boulevard between Ball Road and Cerritos Avenue (Caltrans segment, mitigation infeasible)

Therefore, Impact 5.13-2 would remain significant and unavoidable.

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State highway facilities within the study area are not within the jurisdiction of the City of Anaheim. Rather, those improvements are planned, funded, and constructed by the State of California through a legislative and political process involving the State Legislature; the California Transportation Commission (CTC); the

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