

6. Significant Unavoidable Adverse Impacts

At the end of Chapter 1, *Executive Summary*, is a table that 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:

Air Quality

- **Impact 5.2-1, Inconsistency with Air Quality Management Plan.** The General Plan Update (GPU) would be inconsistent with the South Coast Air Quality Management Plan (AQMP) because buildout under the GPU would exceed the population estimates assumed for the AQMP and would cumulatively contribute to the nonattainment designations of the South Coast Air Basin (SoCAB).

Incorporation of Mitigation Measure AQ-2 into future development projects for the operation phase would contribute to reduced criteria air pollutant emissions associated with buildout of the GPU. Additionally, goals and policies in the GPU would promote increased capacity for alternative transportation modes and implementation of transportation demand management strategies. However, due to the magnitude and scale of the land uses that would be developed, no mitigation measures are available that would reduce operation and construction impacts below South Coast Air Quality Management District (AQMD) thresholds. In addition, the population and employment assumptions of the AQMP would continue to be exceeded until the AQMP is revised and incorporates the projections of the General Plan Update. Therefore, Impact 5.2-1 would remain significant and unavoidable.

- **Impact 5.2-2, Construction Emissions.** Buildout of the General Plan Update would occur over a period of approximately 25 years or longer. Construction activities associated with buildout of the GPU could generate short-term emissions that exceed the South Coast AQMD'S significance thresholds during this time and cumulatively contribute to the nonattainment designations of the SoCAB. Implementation of Mitigation Measure AQ-1 would reduce criteria air pollutant emissions from construction-related activities to the extent feasible. However, construction time frames and equipment for site-specific development projects are not available at this time, and there is a potential for multiple development projects to be constructed at one time, resulting in significant construction-related emissions. Therefore, despite adherence to Mitigation Measure AQ-1, Impact 5.2-2 would remain significant and unavoidable.
- **Impact 5.2-3, Long-Term Emissions.** Buildout in accordance with the GPU would generate long-term emissions that would exceed South Coast AQMD's regional significance thresholds and cumulatively contribute to the nonattainment designations of the SoCAB. Mitigation Measure AQ-2, in addition to the goals and policies of the GPU, would reduce air pollutant emissions to the extent feasible. The measures and policies covering topics such as expansion of the pedestrian and bicycle networks, promotion of public and active transit, and support to increase building energy efficiency and energy conservation would also

6. Significant Unavoidable Adverse Impacts

reduce criteria air pollutants in the city. Further, compared to existing baseline year conditions, emissions of NO_x, CO, and SO_x are projected to decrease from current levels despite growth associated with the GPU.

However, Impact 5.2-3 would remain significant and unavoidable due to the magnitude of the overall land use development associated with the GPU. Contributing to the nonattainment status would also contribute to elevated health effects associated with criteria air pollutants.

- **Impact 5.2-4, Exposure of Sensitive Receptors to Toxic Air Contaminants.** Buildout of the GPU could expose sensitive receptors to substantial concentrations of toxic air contaminants. Buildout could result in new sources of criteria air pollutant emissions and/or toxic air contaminants (TACs) near existing or planned sensitive receptors. Review of development projects by South Coast AQMD for permitted sources of air toxics (e.g., industrial facilities, dry cleaners, and gasoline dispensing facilities) would ensure that health risks are minimized. Additionally, Mitigation Measure AQ-3 would ensure mobile sources of TACs not covered under South Coast AQMD permits are considered during subsequent, project-level environmental review by the City of Santa Ana. Individual development projects would be required to achieve the incremental risk thresholds established by South Coast AQMD, and TACs would be less than significant.

However, implementation of the GPU would generate TACs that could contribute to elevated levels in the air basin. Though individual projects would achieve the project-level risk threshold of 10 per million, they would nonetheless contribute to the higher levels of risk in the SoCAB. Therefore, the GPU's cumulative contribution to health risk is significant and unavoidable.

- **Impact 5.2-5, Exceeding Localized Significance Thresholds.** Because existing sensitive receptors may be close to project-related construction activities and large emitters of on-site operation-related criteria air pollutant emissions, construction and operation emissions generated by individual development projects have the potential to exceed South Coast AQMD's Local Significance Thresholds (LSTs). Mitigation Measures AQ-1 and AQ-2 would reduce the regional construction and operation emissions associated with buildout of the GPU and therefore also result in a reduction of localized construction- and operation-related criteria air pollutant emissions to the extent feasible. However, even with the implementation of these mitigation measures, Impact 5.2-5 would remain significant and unavoidable.

Cultural Resources

- **Impact 5.4-1, Historic Resources.** Generally, potential impacts to historical resources resulting from future projects developed pursuant to the GPU would be mitigated by the City's fulfillment of its statutory responsibilities under CEQA. However, for certain development pursuant to the GPU, the City may determine that significant impacts to historical resources cannot be avoided. The City shall require, at a minimum, that the affected historical resources be thoroughly documented before issuance of any permits. Though the possible demolition or alteration of a historical resource cannot be mitigated to a less than significant level, recordation of the resource would reduce significant adverse impacts to historical

6. Significant Unavoidable Adverse Impacts

resources to the maximum extent feasible. Nevertheless, impacts to historical resources would be significant and unavoidable.

Greenhouse Gas Emissions

- **Impact 5.7-1, Greenhouse Gas Emissions.** Implementation of Mitigation Measure GHG-1 would ensure that the City is tracking and monitoring the City's GHG emissions in order to chart a trajectory to achieve the long-term, year 2050, GHG reduction goal set by Executive Order S-03-05. However, at this time, there is no plan past 2030 that achieves the long-term GHG reduction goal established under Executive Order S-03-05. As identified by the California Council on Science and Technology, the state cannot meet the 2050 goal without major advancements in technology. Advancements in technology in the future could provide additional reductions and allow the State and City to meet the 2050 goal, but in the meantime, Impact 5.7-1 would be significant and unavoidable.

Noise

- **Impact 5.12-1, Construction Noise.** Mitigation Measure N-1 would reduce potential noise impacts during construction to the extent feasible. However, due to the potential for proximity of construction activities to sensitive uses, the number of construction projects occurring simultaneously, and the potential duration of construction activities, Impact 5.12-1 could result in a temporary substantial increase in noise levels above ambient conditions. Therefore, impacts would remain significant and unavoidable. It should be noted that the identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent projects analyzed at the project level.
- **Impact 5.12-2, Traffic Noise.** Mitigation Measure N-2 would reduce potential interior noise impacts to future noise-sensitive receptors below the thresholds. However, there are no feasible or practical mitigation measures available to reduce project-generated traffic noise to less than significant levels for existing residences along affected roadways. No individual measures and no set of feasible or practical mitigation measures are available to reduce project-generated traffic noise to less than significant levels in all cases. Thus, traffic noise would remain a significant and unavoidable impact. It should be noted that the identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent projects analyzed at the project level.

6. Significant Unavoidable Adverse Impacts

Population and Housing

- **Impact 5.13-1, Population and Housing Growth.** Full buildout of the GPU would result in a population of 431,629, and the city's 2045 population growth would be approximately 20 percent greater than the Orange County COG's 2045 projections. Furthermore, the city's housing units at buildout would be 115,053, which exceeds the Orange County COG's projection by 38 percent. There are no feasible mitigation measures to mitigate the population and housing growth at buildout, and impacts would be significant and unavoidable.

Recreation

- **Impact 5.15-1, Physical Deterioration of Parks and Recreational Facilities.** Compliance with regulatory requirements and implementation of proposed GPU policies and implementation actions would reduce the potential impact of the proposed GPU on existing park facilities. However, because of the existing park deficiencies and scale of development in park-deficient areas, the project's impact would be significant and unavoidable.
- **Impact 5.15-2, Impacts from Construction or Expansion of Parks and Recreational Facilities.** Population increases resulting from project implementation would increase recreation demands and require construction or expansion of recreation facilities that would have potential to result in physical impacts to the environment.