

---

## 5. GENERAL IMPACT CATEGORIES

### 2. SIGNIFICANT UNAVOIDABLE IMPACTS

---

Section 15126.2(b) of the State CEQA Guidelines requires that an EIR describe any significant environmental impacts which cannot be avoided. Specifically, Section 15126.2(b) states:

*“Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.”*

Based on the analysis contained in Section 4.0. Environmental Impact Analysis, of this Draft EIR, implementation of the Proposed Project would result in significant and unavoidable environmental impacts associated with the following environmental issues:

- Construction air quality (localized PM<sub>10</sub> and PM<sub>2.5</sub> emissions);
- Construction related noise impacts.

As discussed in greater detail in Section 4.2, Air Quality, the Proposed Project would result in significant localized air emissions in close proximity to residential land uses within 100 meters of the Project Site on a temporary and intermittent basis during construction. Localized NO<sub>x</sub> and CO emissions would be below the significance thresholds at all sensitive receptor locations. However, localized thresholds would be exceeded for PM<sub>10</sub> and PM<sub>2.5</sub> emissions at two locations: (1) the single family residential land uses located immediately north of the Project Site (within a proximity of 100 meters) and (2) the residential land uses within 100 meters south of the Project Site in the vicinity of Market Street and Race Street. Localized emissions would be below the stated thresholds for any land use located further than 100 meters from the Project Site. Therefore, localized air quality impacts resulting from construction activities would be considered significant and unavoidable.

As discussed in greater detail in Section 4.8, Noise, the Proposed Project’s construction noise impacts would exceed the maximum allowable exterior noise levels. Thus, the Proposed Project’s construction noise impacts would be considered a significant impact on a short term and intermittent basis during the construction period.