



CITY OF SANTA FE SPRINGS
MEETING OF THE PLANNING COMMISSION
TUESDAY, FEBRUARY 11, 2025
AT 6:00 P.M.

CITY HALL COUNCIL CHAMBERS
11710 TELEGRAPH ROAD
SANTA FE SPRINGS, CA 90670

PLANNING COMMISSION

Jay Sarno, Chairperson
Gabriel Jimenez, Vice Chairperson
David Ayala, Commissioner
Isabel Cervantes, Commissioner
Joseph Flores, Commissioner

DIRECTOR OF COMMUNITY
DEVELOPMENT
Cuong Nguyen

ASSISTANT CITY
ATTORNEY
Susie Altamirano

CITY STAFF

Senior Planner
Associate Planner
Associate Planner
Assistant Planner
Planning Consultant
Planning Commission Secretary
Administrative Intern
Administrative Intern

Vince Velasco
Jimmy Wong
Claudia Jimenez
Alejandro De Loera
Laurel Reimer
Esmeralda Elise
Cynthia Alvarez
James Kamstra

NOTICES

This Planning Commission Meeting (“Planning”) will be held in person and will meet at City Hall – City Council Chambers, 11710 E. Telegraph Road, Santa Fe Springs, California. The meeting will be live streamed on the City’s YouTube Channel and can be accessed on the City’s website via the following link:

https://www.santafesprings.gov/city_council/city_council_commissions_committees/planning_commission/index.php

Americans with Disabilities Act: In compliance with the ADA, if you need special assistance to participate in a city meeting or other services offered by this City, please contact the Planning Commission Secretary’s Office. Notification of at least 48 hours prior to the meeting or time when services are needed will assist the City staff in assuring that reasonable arrangements can be made to provide accessibility to the meeting or service.

SB 1439: Effective January 1, 2025 Planning Commission Members are subject to SB 1439 and cannot participate in certain decisions for a year after accepting campaign contributions of \$500 or more from an interested person. The Planning Commission would need to disclose the donation and abstain from voting.

Public Comment: The public is encouraged to address Planning Commission on any matter listed on the agenda or on any other matter within its jurisdiction. If you wish to address the Planning Commission on the day of the meeting, please fill out a speaker card provided at the door and submit it to the Planning Commission Secretary. You may also submit comments in writing by sending them to the Planning Commission Secretary at esmeraldaelise@santafesprings.gov. All written comments received by 12:00 p.m. the day of the Planning Commission Meeting will be distributed to the Planning Commission and made a part of the official record of the meeting. Written comments will not be read at the meeting, only the name of the person submitting the comment will be announced. Pursuant to provisions of the Brown Act, no action may be taken on a matter unless it is listed on the agenda, or unless certain emergency or special circumstances exist. The Planning Commission may direct staff to investigate and/or schedule certain matters for consideration at a future Planning Commission meeting.

Please Note: Staff reports and supplemental attachments are available for inspection at the office of the Planning Commission Secretary in City Hall during regular business hours 7:30 a.m. – 5:30 p.m., Monday – Thursday. Telephone: (562) 868-0511.

CALL TO ORDER**ROLL CALL****PLEDGE OF ALLEGIANCE****EX PARTE COMMUNICATIONS****PUBLIC COMMENTS ON NON-AGENDA & NON-PUBLIC HEARING AGENDA ITEMS**

At this time, the general public may address the Planning Commission on both non-agenda and non-public hearing agenda items. Please be aware that the maximum time allotted for members of the public to speak shall not exceed three (3) minutes per speaker. State Law prohibits the Planning Commission from taking action or entertaining extended discussion on a topic not listed on the agenda. Please show courtesy to others and direct all of your comments to the Planning Commission.

CONSENT CALENDAR

All matters listed under the Consent Calendar are considered to be routine. Any items a Planning Commissioner wishes to discuss should be designated at this time. All other items may be approved in a single motion. Such approval will also waive the reading of any ordinance.

1. MINUTES OF THE JANUARY 27, 2025 REGULAR MEETING

RECOMMENDATION: That the Planning Commission:

- 1) Approve the minutes as submitted.

2. COMPLIANCE REVIEW OF CONDITIONAL USE PERMIT (“CUP”) CASE NO. 751-5 TO ALLOW THE CONTINUED OPERATION AND MAINTENANCE OF DIGITAL BILLBOARD AT 15718 MARQUARDT AVENUE (APN: 7003-01-904) IN THE M-2-FOZ, HEAVY MANUFACTURING - FREEWAY OVERLAY ZONE. (NEWPORT DIVERSIFIED, INC.)

RECOMMENDATION: That the Planning Commission:

- 1) Find and determine that the continued operation and maintenance of a digital billboard on the subject site, if conducted in strict compliance with the conditions of approval, will not be detrimental to persons or properties in the surrounding area or to the City in general, and will be in conformance with the overall purpose and objective of the Zoning Code and consistent with the goals, policies and program of the City’s General Plan.
- 2) Require that Conditional Use Permit Case No. 751-5, be subject to a compliance review in five (5) years, on or before February 11, 2030, to ensure that the use is operating in strict compliance with the conditions of approval as contained within this staff report.

- 3) Take such additional, related action that may be desirable.

PUBLIC HEARING

3. **PUBLIC HEARING – TENTATIVE PARCEL MAP (TPM) NO. 84502: TO SUBDIVIDE AN EXISTING 26.77-ACRE PARCEL (APN: 8005-015-051) INTO TWO PARCELS AND CREATING A NEW CUL-DE-SAC AT THE EASTERN END OF HAWKINS STREET; DEVELOPMENT PLAN APPROVAL (DPA) CASE NO. 1006: TO CONSTRUCT A NEW ±298,373 SQUARE-FOOT CONCRETE TILT-UP INDUSTRIAL BUILDING AND RELATED IMPROVEMENTS ON PARCEL 1; AND DPA CASE NO. 1007: TO CONSTRUCT A NEW ±286,305 SQUARE-FOOT CONCRETE TILT-UP INDUSTRIAL BUILDING AND RELATED IMPROVEMENTS ON PARCEL 2; AND CERTIFICATION OF THE FINAL ENVIRONMENTAL IMPACT REPORT (EIR).**

RECOMMENDATION: That the Planning Commission:

- 1) Open the Public Hearing and receive the written and oral staff report and any comments from the public regarding TPM No. 84502, DPA Case No. 1006, DPA Case No. 1007, and thereafter, close the Public Hearing; and
- 2) Find that the proposed Final EIR meets all the criteria set forth in Section 15164 of the California Environmental Quality Act Guidelines; and
- 3) Find and determine that the proposed project will not be detrimental to persons or properties in the surrounding area or to the City in general, and will be in conformance with the overall purpose and objective of the Zoning Code and consistent with the goals, policies, and programs of the City's General Plan; and
- 4) Find that the applicant's TPM meets the standards set forth in Sections 66474 and 66474.6 of the Subdivision Map Act for the granting of a tentative or final map; and
- 5) Find that the applicant's DPA requests meet the criteria set forth in §155.739 of the City's Zoning Code, for the granting of a DPA; and
- 6) Approve the requested TPM No. 84502, DPA Case No. 1006, and DPA Case No. 1007, subject to the conditions of approval as contained within Resolution No. 281-2025; and
- 7) Adopt Resolution No. 281-2025, which incorporates the Planning Commission's findings and actions regarding this matter, and certifying the Final Environmental Impact Report (EIR) and approving the associated Mitigation Monitoring and Reporting Program (MMRP), Findings of Fact as required by CEQA Guidelines Section 15091, and the Statement of Overriding Considerations; and
- 8) Take such additional, related action that may be desirable.

STAFF COMMUNICATIONS ON ITEMS OF COMMUNITY INTEREST

COMMISSIONER COMMENTS/AB1234 COUNCIL CONFERENCE REPORTING

Commissioner announcements; requests for future agenda items; conference/meetings reports. Members of the Planning Commission will provide a brief report on meetings attended at the expense of the local agency as required by Government Code Section 53232.3(d).

ADJOURNMENT

I, Esmeralda Elise, Planning Commission Secretary for the City of Santa Fe Springs hereby certify that a copy of this agenda has been posted no less than 72 hours at the following locations; City's website at www.santafesprings.gov; Santa Fe Springs City Hall, 11710 Telegraph Road; Santa Fe Springs City Library, 11700 Telegraph Road; and the Town Center Plaza (Kiosk), 11740 Telegraph Road.



Esmeralda Elise
Planning Commission Secretary



CITY OF SANTA FE SPRINGS

PLANNING COMMISSION AGENDA STAFF REPORT

TO: Members of the Planning Commission

FROM: Cuong Nguyen, Director of Community Development

BY: Esmeralda Elise, Executive Assistant

SUBJECT: MINUTES OF THE JANUARY 27, 2025 MEETING

DATE: February 11, 2025

RECOMMENDATION(S):

It is recommended that the Planning Commission:

- 1) Approve the minutes as submitted.

FISCAL IMPACT:

N/A

BACKGROUND/DISCUSSION:

Staff has prepared minutes for the following meeting:

- January 27, 2025 Planning Commission Meeting

ANALYSIS:

N/A

ENVIRONMENTAL:

N/A

DISCUSSION:

N/A

SUMMARY

N/A

ATTACHMENT(S):

1. Minutes of the January 27, 2025 Planning Commission Meeting

<u>ITEM STATUS:</u>	
APPROVED:	☐
DENIED:	☐
TABLED:	☐
DIRECTION GIVEN:	☐



APPROVED:

MINUTES OF THE REGULAR MEETING OF THE SANTA FE SPRINGS PLANNING COMMISSION

January 27, 2025

1. CALL TO ORDER

Chairperson Ayala called the meeting to order at 6:01 p.m.

2. PLEDGE OF ALLEGIANCE

Chairperson Ayala called upon Commissioner Flores to lead everyone in the Pledge of Allegiance.

3. ROLL CALL

Members present:

Chairperson Ayala
Commissioner Cervantes
Commissioner Flores
Commissioner Jimenez
Commissioner Sarno

Staff:

Susie Altamirano, Assistant City Attorney
Cuong Nguyen, Director of Community Development
Vince Velasco, Senior Planner
Claudia Jimenez, Associate Planner
Laurel Reimer, Planning Consultant
Esmeralda Elise, Planning Commission Secretary

4. EX PARTE COMMUNICATIONS

None

5. PUBLIC COMMENT

None

6. ELECTIONS FOR PLANNING COMMISSION CHAIRPERSON AND VICE CHAIRPERSON

Planning Commission Secretary declared the Office of Planning Commission Chairperson vacant and requested nominations.

Commissioner Flores nominated Commissioner Sarno for Chairperson, having no further nominations the Office of Chair was closed.

Commissioner Flores moved to confirm the nomination for Commissioner Sarno, Commissioner Ayala seconded the nomination, which passed with the following roll call vote:

Ayes: Ayala, Cervantes, Flores, Jimenez, and Sarno

Nays: None

Planning Commission Secretary declared the Office of Planning Commission Vice Chair vacant and requested nominations.

Commissioner Ayala nominated Commissioner Jimenez. Chair Sarno nominated Commissioner Cervantes. The nominations went to a vote.

Commissioner Jimenez won the Office of Planning Commission Vice Chair by the following roll call vote.

Jimenez: Ayala, Flores, Jimenez

Cervantes: Cervantes, Sarno

7. CONSENT ITEM

Consent Agenda items are considered routine matters, which may be enacted, by one motion and roll call vote. Any item may be removed from the Consent Agenda and considered separately by the Planning Commission.

1. MINUTES OF THE DECEMBER 09, 2024 REGULAR MEETING
2. COMPLIANCE REVIEW REPORT FOR ALCOHOL SALES CONDITIONAL USE PERMIT CASE NO. 73 – BARREL TEN QUARTER CIRCLE, INC.
3. COMPLIANCE REVIEW REPORT FOR ALCOHOL SALES CONDITIONAL USE PERMIT CASE NO. 84 – 21ST CENTURY SPIRITS, LLC

Chairperson Sarno requested a motion and a second for Consent Item Nos 1, 2, and 3.

It was moved by Commissioner Ayala and seconded by Commissioner Ayala to approve Consent Item Nos 1, 2, and 3, and the recommendations regarding this matter, which passed by the following roll call vote:

Ayes: Ayala, Cervantes, Flores, Jimenez, and Sarno

Nays: None

Absent: None

Chairperson Sarno read the City's appeal process.

8. PUBLIC HEARING

TO CONSIDER THE PROPOSED ZONING CODE AMENDMENT TO AMEND SECTION 155.519 (INTERSTATE 605 CORRIDOR ELECTRONIC BILLBOARD SIGN PROGRAM) WITHIN TITLE 15 (LAND USE), CHAPTER 155 (ZONING), OF THE SANTA FE SPRINGS MUNICIPAL CODE AND DETERMINATION THAT THE PROJECT IS EXEMPT FROM CEQA.

Recommendation:

Chair Sarno called upon Planning Consultant Laurel Reimer to present this item.

Chair Sarno opened the Public Hearing at 6:15 p.m. and inquired if any comments were received via email. Planning Commission Secretary Esmeralda Elise responded no comments were received.

Having no questions or comments, Chair Sarno closed the Public Hearing at 6:16 p.m. and requested a motion.

It was moved by Commissioner Cervantes, seconded by Vice Chair Jimenez to adopt Resolution No. 279-2024, which incorporates the Planning Commission's findings and actions regarding this matter, which passed by the following roll call vote:

Ayes: Ayala, Cervantes, Flores, Jimenez, and Sarno
Nays: None
Absent: None

Chairperson Sarno read the City's appeal process.

9. NEW BUSINESS

MODIFICATION PERMIT ("MOD") CASE NO 1364 - A REQUEST TO TEMPORARILY RESERVE AND NOT PROVIDE 54 REQUIRED ON-SITE PARKING STALLS FOR THE PROPERTY LOCATED AT 10425 S. PAINTER AVENUE, WITHIN THE M-2 (HEAVY MANUFACTURING) ZONE. (JUAN NAVARRO ON BEHALF OF LOS ANGELES CENTER FOR ALCOHOL AND DRUG ABUSE (LACADA)).

Recommendation:

Chair Sarno called upon Associate Planner Claudia Jimenez to present this item.

Chair Sarno asked if the Commissioners had any questions.

The Commissioners had some questions for Staff and the Applicant. A discussion ensued.

Having no more questions or comments, Chair Sarno requested a motion.

It was moved by Commissioner Cervantes, seconded by Commissioner Cervantes to approve MOD Case No. 1364 and adopt Resolution No. 280-2025, which incorporates the Planning Commission's findings and actions regarding this matter, which passed by the following roll call vote:

Ayes: Ayala, Cervantes, Flores, Jimenez, and Sarno
Nays: None
Absent: None

Chairperson Sarno read the City's appeal process.

10. ANNOUNCEMENTS

- Staff

Director of Community Development Cuong Nguyen welcomed Commissioner Sarno and gave an update on the Melia Homes project.

Planning Commission Secretary mentioned the two back-to-back City Holidays in February, which would interfere with the Monday date of the Planning Commission February meeting. A discussion ensued and the Commissioners all agreed to have the February meeting on Tuesday, February 11th, 2025.

- Commissioners

All the Commissioners wished everyone a Happy New Year and welcomed Jay Sarno to the Planning Commission.

11. ADJOURNMENT

Chair Sarno adjourned the meeting at 6:40 p.m.

ATTEST:

Esmeralda Elise
Planning Commission Secretary

Chair Sarno

Date



CITY OF SANTA FE SPRINGS

PLANNING COMMISSION AGENDA STAFF REPORT

TO: Members of the Planning Commission

FROM: Cuong Nguyen, Director of Community Development

BY: Cynthia Alvarez, Administrative Intern

SUBJECT: COMPLIANCE REVIEW OF CONDITIONAL USE PERMIT (“CUP”) CASE NO. 751-5 TO ALLOW THE CONTINUED OPERATION AND MAINTENANCE OF DIGITAL BILLBOARD AT 15718 MARQUARDT AVENUE (APN: 7003-01-904) IN THE M-2-FOZ, HEAVY MANUFACTURING - FREEWAY OVERLAY ZONE. (NEWPORT DIVERSIFIED, INC.)

DATE: February 11, 2025

RECOMMENDATION(S):

It is recommended that the Planning Commission:

- 1) Find and determine that the continued operation and maintenance of a digital billboard on the subject site, if conducted in strict compliance with the conditions of approval, will not be detrimental to persons or properties in the surrounding area or to the City in general, and will be in conformance with the overall purpose and objective of the Zoning Code and consistent with the goals, policies and program of the City’s General Plan.
- 2) Require that Conditional Use Permit Case No. 751-5, be subject to a compliance review in five (5) years, on or before February 11, 2030, to ensure that the use is operating in strict compliance with the conditions of approval as contained within this staff report.
- 3) Take such additional, related action that may be desirable.

FISCAL IMPACT:

Aside from the processing fees collected for the subject compliance review, there is no ongoing fiscal impact.

Conditional Use Permit Case No. 751-5

Page 2 of 11

BACKGROUND/DISCUSSION:

The subject property is a triangular-shaped lot located at 15718 Marquardt Avenue (APN: 7003-01-904). The property is bordered by Marquardt Avenue to the west, Alondra Boulevard to the south, and the I-5 Greenway to the northeast. It measures 18,915 sq. ft. (approximately .43-acres) and is located within the M-2 FOZ (Heavy Manufacturing – Freeway Overlay Zone) zone. On February 18, 2015, the Planning Commission originally approved CUP Case No. 751 to allow the applicant, Newport Diversified, Inc. to construct, operate and maintain a new double-faced billboard on the subject property.

Project/Applicant Information

Project Location:	15718 Marquardt Avenue
Project Applicant:	Newport Diversified, Inc.
Property Owner:	Same as applicant
General Plan Designation:	Industrial
Zoning Designation:	M-2-FOZ, Heavy Manufacturing - Freeway Overlay Zone
Existing Use on Project Site:	Digital Billboard

Code Section:	Conditional Uses:
§155.721	Unless otherwise specified in the action granting a conditional use permit, said conditional use permit which has not been utilized within 12 months from the effective date shall become null and void. Also, the abandonment or nonuse of a conditional use permit for a period of 12 consecutive months shall terminate said conditional use permit and any privileges granted thereunder shall become null and void. However, an extension of time may be granted by commission or council action.

ANALYSIS:

As is standard practice for all CUP compliance reviews, on January 13, 2025, an inspection of the subject property was performed by City staff to ensure continued compliance with the conditions of approval prior to bringing the matter back to the Planning Commission. During the recent inspection on January 13, 2025, staff found the completed billboard was entirely installed and operating in full compliance with the existing conditions of approval.

ENVIRONMENTAL:

N/A

Conditional Use Permit Case No. 751-5

Page 3 of 11

DISCUSSION:

N/A

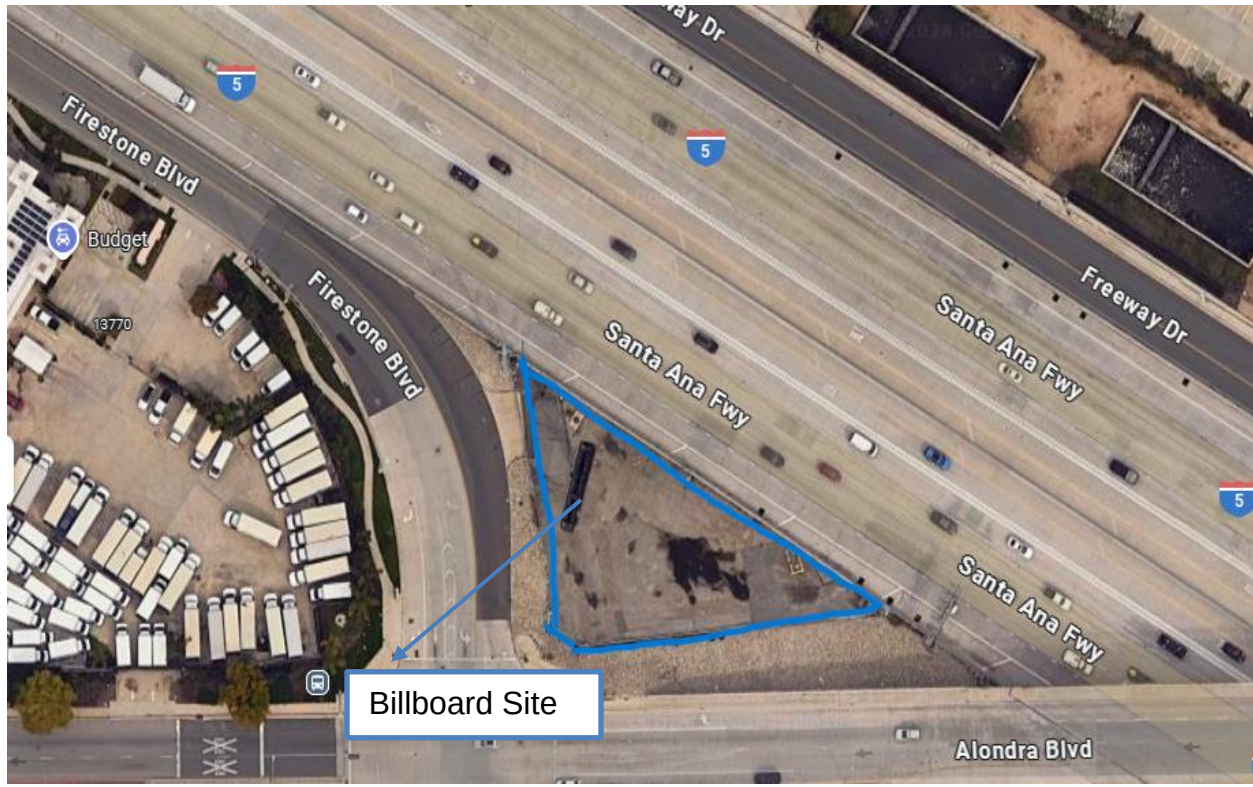
SUMMARY/NEXT STEPS:

Staff finds that if the subject billboard continues to operate in strict compliance with the required conditions of approval, the use will continue to be compatible with the surrounding developments and will not pose a nuisance risk to the public or environment. Therefore, staff recommends that CUP 751-5 be subject to a compliance review in five (5) years to ensure the use is still operating in compliance with the conditions of approval as contained in this staff report.

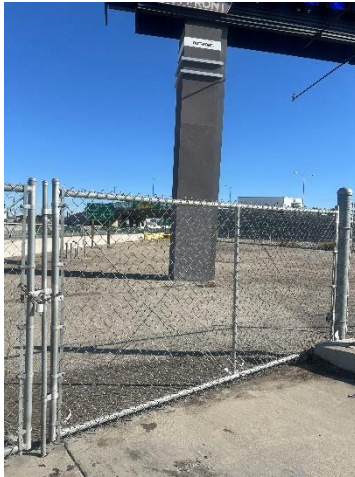
ATTACHMENT(S):

1. Attachment A – Aerial Photograph
2. Attachment B – Inspection Photos
3. Attachment C – Compliance Letter Request
4. Attachment D – Conditions of Approval

ATTACHMENT A –
AERIAL PHOTOGRAPH



ATTACHMENT B – JANUARY 13, 2025,
INSPECTION PHOTOS



Conditional Use Permit Case No. 751-5

Page 6 of 11

ATTACHMENT C –
COMPLIANCE REQUEST LETTER

Newport Diversified, Inc.

13920 Mica St.
Santa Fe Springs, CA 90670
(626) 485 – 8865
Fax: (562) 921– 1706

January 6, 2025

Ms. Cynthia Alvarez
Administrative Intern
Department of Community Development
City of Santa Fe Springs
11710 Telegraph Rd.
Santa Fe Springs, CA 90670

RE: Conditional Use Permit (CUP) Case No. 751-5
15718 Marquardt, Santa Fe Springs, CA 90670

Dear Cynthia,

Per a condition in our CUP # 751-5, regarding the Electronic Billboard, we would like to request Compliance Review consideration.

As requested in your 12-19 correspondence, we have paid the \$563.00 processing fee on 12/19/2024, receipt issued by Juanita Centeno.

Since our existing CUP review, we have not made any changes in our operation of the electronic billboard, including no changes to the site where it is located. We continue to follow all the conditions in the CUP including all upkeep and maintenance.

Thank you in advance for your consideration.

Rick Landis
Director Business Development

ATTACHMENT D –
CONDITIONS OF APPROVAL

NOTE: Changes to existing conditions are provided as a strike-through or bolded lettering.

ENGINEERING / PUBLIC WORKS DEPARTMENT:

(Contact: Alex Flores 562.868-0511 x3302)

1. That a grading plan shall be submitted showing elevations and drainage pattern of the site. The improvements shall not impede, obstruct or pond water onsite. The grading plan shall be submitted for drainage approval to the City Engineer. The owner shall pay drainage review fees in conjunction with this submittal. **(complete)**

POLICE SERVICES DEPARTMENT:

(Contact: Kristen Haining 562.868.409.1850 x 3302)

2. That the Applicant shall provide an emergency phone number and the name of a contact person to the Department of Police Services. The name, telephone number, fax number and e-mail address of that person shall be provided to the Director of Police Services no later than 60 days from the date of approval by the Planning Commission. Emergency information shall allow emergency service to reach the owner/developer or their representative any time, 24 hours a day. **(ongoing)**
3. That the support post of the billboards shall be treated with a graffiti-proof paint finish and the billboards shall be maintained in good repair, free from trash, debris, litter and graffiti and other forms of vandalism. Any damage from any cause shall be repaired within 72 hours of occurrence, weather permitting, to minimize occurrences of dangerous conditions or visual blight. Paint utilized in covering graffiti shall be a color that matches, as closely possible, the color of the existing and/or adjacent surfaces. **(ongoing)**
4. That the Applicant shall not plant trees, shrubs or other type of foliage, or install any structures or appendages that would allow unauthorized individuals to scale the billboard(s). **(ongoing)**
5. That should any of the lights, illuminated letters or decorative illuminated elements, cease to function on the signs, the operator shall repair them within 72 hours. Otherwise, the operator shall contact the City to present alternatives in addressing the malfunctions. **(ongoing)**

Conditional Use Permit Case No. 751-5

Page 8 of 11

6. That the Applicant shall maintain a fence around the subject property with an operable gate(s). The Applicant shall not place or install any type of barbed-wire, razor wire, or similar materials anywhere on the fence. **(ongoing)**
7. That the applicant shall ~~place~~ **continue to maintain** signs on the property to notify that the property is private and unauthorized individuals found on the property will be charged with trespassing and be subject to arrest. The signs shall be installed in areas highly visible to the public during the day and night. **(ongoing)**
8. That lighting, if installed for the parcel, shall be installed so that it does not become distracting to the traffic on the street and/or freeway. **(ongoing)**
9. That personnel during the construction phase, and/or maintaining the sign, thereafter, shall park on-site at all times. **(ongoing)**

WASTE MANAGEMENT :

(Contact : Joe Barrios 562.868.0511 x 3601)

10. That the applicant shall comply with Section 50.51 of the Municipal Code which prohibits any business or residents from contracting any solid waste disposal company that does not hold a current permit from the City. **(complete)**
11. That all projects over \$50,000 are subject to the requirements of Ordinance No. 914 to reuse or recycle 75% of the project waste. Contact the Recycling Coordinator, Teresa Cavallo at (562) 868-0511 x7309. **(complete)**

COMMUNITY DEVELOPMENT DEPARTMENT:

(Contact: Cynthia Alvarez 562.868-0511 x7519)

12. That this approval allows the applicant, Newport Diversified Inc., to establish, operate and maintain a new digital billboard on property located at 15718 Marquardt Avenue (*previous* APN: 7003-001-904). **(ongoing)**
13. That the subject billboard shall be in conformance with Section 155.384 (Billboards) of the City of Santa Fe Springs Zoning Regulations. **(ongoing)**
14. That the subject billboard shall be in conformance with Ordinance No. 1036, an ordinance of the City of Santa Fe Springs relating to the standards for the installation of billboards on certain properties in the City. **(ongoing)**

Conditional Use Permit Case No. 751-5

Page 9 of 11

15. That approval of Conditional Use Permits No. 751 shall not be construed to mean any waiver of applicable and appropriate zoning regulations, or any Federal, State, County, and City laws and regulations. **(ongoing)**
16. That all required permits regarding Highway Oriented Signs shall be obtained from the California Department of Transportation (Caltrans). **(ongoing)**
17. That Conditional Use Permit No. 751 (CUP) shall be subject to the execution of a Development Agreement between the City Council and Newport Diversified, Inc. regarding the operation of the subject billboard. The applicant and the City shall commence the preparation of the Development Agreement upon the approval of the CUP and shall complete related negotiations and execute the Agreement within nine (9) months from effective date of approval of the CUP. **(completed)**
18. That the proposed digital billboard shall not have any walkways or platforms or any type of appendages or attachments. The only exception shall be for a camera to monitor the face of the billboard. **(ongoing)**
19. That ~~prior to completion of the billboard installation~~ **in the event that there is a change**, the Applicant shall provide the Community Development Department with the telephone number of ~~the~~ **the new** maintenance service to be available twenty-four (24) hours a day, to be contacted in the event that the billboard becomes dilapidated, damaged and/or malfunctioning. **(ongoing)**
20. That the message transition for the subject digital billboard shall be instantaneous or 1-2 seconds, if fading. **(ongoing)**
21. That lighting levels on the subject digital billboard shall not exceed 0.3-foot candles above ambient light from 250 feet, as measured according to standards of the Outdoor Advertising Association of America (OAAA). **(ongoing)**
22. That brightness of the subject digital billboard shall not exceed 800 nits (candela per square meter) from sunset to sunrise. At all other times, brightness shall not exceed 7500 nits. **(ongoing)**
23. That within one week after the sign is activated, a qualified lighting consultant/electrical engineer shall measure the sign intensity at the sign face and ensure compliance with Condition 21 above regarding the standard of 0.3-foot candles above ambient light from 250 feet. Written verification of compliance shall be provided to the Planning Department

within one week following sign activation. All cost shall be the responsibility of the Applicant **(complete)**

24. That the applicant shall comply with the City's "Heritage Artwork in Public Places Program" in conformance with City Ordinance No. 1054. **(ongoing)**
25. That all fences, walls, gates and similar improvements for the proposed development shall be subject to the prior approval of the Fire Department and the Department of Community Development. **(complete)**
26. That the proposed digital billboard shall otherwise be substantially in accordance with the plans submitted by the applicant and on file with the case. **(complete)**
27. That the owner/applicant shall require and verify that all contractors and sub-contractors have successfully obtained a Business License with the City of Santa Fe Springs prior to beginning any work associated with the subject project. A late fee and penalty will be assessed to any contractor or sub-contractor that fails to obtain a Business License and a Building Permit final, or Certificate of Occupancy will not be issued until all fees and penalties are paid in full. Please contact Cecilia Martinez, Business License Clerk, at (562) 868-0511, extension 7527 for additional information and application or one can be downloaded at www.santafesprings.org. **(complete)**
28. That the project shall comply with all other requirements of the City's Zoning Ordinance, Building Code, Property Maintenance Ordinance, State and City Fire Code and all other applicable County, State and Federal regulations and codes. **(ongoing)**
29. That Conditional Use Permit Case No. 751 shall be subject to a compliance review in five **(5)** year, on or before ~~December 9, 2024~~, **February 11, 2030**, to ensure the subject digital billboard use has been continuously maintained in strict compliance with the conditions of approval as stated within the staff report. **(revised-ongoing)**
30. That the applicant, Newport Diversified Inc., agrees to defend, indemnify and hold harmless the City of Santa Fe Springs, its agents, officers and employees from any claim, action or proceeding against the City or its agents, officers or employees to attack, set aside, void or annul an approval of the City or any of its councils, commissions, committees or boards arising from or in any way related to the subject CUP, or any actions or operations conducted pursuant thereto. Should the City, its agents, officers or employees receive notice of any such claim, action or proceeding, the City

shall promptly notify the owner/developer of such claim, action or proceeding, and shall cooperate fully in the defense thereof. **(ongoing)**

31. It is hereby declared to be the intent that if any provision of this Permit is violated, or if any law, statute or ordinance is violated, the Permit shall be void and the privileges granted hereunder shall lapse. Prior to voiding the permit, the City shall contact Newport Diversified Inc. with certified mail return receipt requested and list the specific facts indicating a violation and its applicable code provisions and allow Newport Diversified Inc. to remedy the violation within seven (7) working days from receipt of the notice or a reasonable amount of time if a remedy cannot be reasonably done in seven (7) days. **(ongoing)**
32. If any term or provision of this CUP shall be determined invalid, void, or unenforceable, the remaining conditions shall not be affected, and such remaining conditions are not rendered impractical to enforce or to otherwise deprive Newport Diversified Inc. or the city of the benefits of this CUP. **(ongoing)**



CITY OF SANTA FE SPRINGS

PLANNING COMMISSION AGENDA STAFF REPORT

TO: Members of the Planning Commission

FROM: Cuong Nguyen, Director of Community Development

BY: Jimmy Wong, Associate Planner

SUBJECT: **PUBLIC HEARING – TENTATIVE PARCEL MAP (TPM) NO. 84502: TO SUBDIVIDE AN EXISTING 26.77-ACRE PARCEL (APN: 8005-015-051) INTO TWO PARCELS AND CREATING A NEW CUL-DE-SAC AT THE EASTERN END OF HAWKINS STREET; DEVELOPMENT PLAN APPROVAL (DPA) CASE NO. 1006: TO CONSTRUCT A NEW ±298,373 SQUARE-FOOT CONCRETE TILT-UP INDUSTRIAL BUILDING AND RELATED IMPROVEMENTS ON PARCEL 1; AND DPA CASE NO. 1007: TO CONSTRUCT A NEW ±286,305 SQUARE-FOOT CONCRETE TILT-UP INDUSTRIAL BUILDING AND RELATED IMPROVEMENTS ON PARCEL 2; AND CERTIFICATION OF THE FINAL ENVIRONMENTAL IMPACT REPORT (EIR).**

DATE: February 11, 2025

RECOMMENDATION(S)

It is recommended that the Planning Commission:

- 1) Open the Public Hearing and receive the written and oral staff report and any comments from the public regarding TPM No. 84502, DPA Case No. 1006, DPA Case No. 1007, and thereafter, close the Public Hearing; and
- 2) Find that the proposed Final EIR meets all the criteria set forth in Section 15164 of the California Environmental Quality Act Guidelines; and
- 3) Find and determine that the proposed project will not be detrimental to persons or properties in the surrounding area or to the City in general, and will be in conformance with the overall purpose and objective of the Zoning Code and consistent with the goals, policies, and programs of the City's General Plan; and
- 4) Find that the applicant's TPM meets the standards set forth in Sections 66474 and 66474.6 of the Subdivision Map Act for the granting of a tentative or final map; and

- 5) Find that the applicant's DPA requests meet the criteria set forth in §155.739 of the City's Zoning Code, for the granting of a DPA; and
- 6) Approve the requested TPM No. 84502, DPA Case No. 1006, and DPA Case No. 1007, subject to the conditions of approval as contained within Resolution No. 281-2025; and
- 7) Adopt Resolution No. 281-2025, which incorporates the Planning Commission's findings and actions regarding this matter, and certifying the Final Environmental Impact Report (EIR) and approving the associated Mitigation Monitoring and Reporting Program (MMRP), Findings of Fact as required by CEQA Guidelines Section 15091, and the Statement of Overriding Considerations; and
- 8) Take such additional, related action that may be desirable.

FISCAL IMPACT

Aside from the processing fees collected for the subject project, there is no ongoing fiscal impact.

BACKGROUND/DISCUSSION

On September 10, 2018, the former property owner, Breitburn Operating L.P., submitted TPM No. 78232, which was subsequently approved by the Planning Commission. This approval allowed for the subdivision of a 44.67-acre site, originally consisting of seven (7) parcels, into five (5) parcels.

As part of the TPM approval, the former property owner also proposed—and received approval—to construct four (4) industrial buildings on four (4) of the newly subdivided parcels. The remaining 26.77-acre parcel was designated for continued oil extraction operations.

On March 12, 2024, EPD Solutions, Inc., on behalf of the current owner, Bridgeland Resources LLC ("Applicant"), submitted a request for the following entitlements to develop the remaining 26.77-acre parcel (Parcel 5):

TENTATIVE PARCEL MAP NO. 84502: To subdivide an existing 26.77-acre parcel (APN: 8005-015-051) into two parcels and creating a new cul-de-sac at the eastern end of Hawkins Street.

DEVELOPMENT PLAN APPROVAL CASE NO. 1006: To construct a new ±298,373 square-foot concrete tilt-up industrial building and related improvements on Parcel 1.

DEVELOPMENT PLAN APPROVAL CASE NO. 1007: To construct a new ±286,305

square-foot concrete tilt-up industrial building and related improvements on Parcel 2.

Project/Applicant Information:

Project Site: East end of Hawkins Street (APN: 8005-015-051)

Project Applicant: EPD Solutions, Inc., on behalf of Bridgeland Resources, LLC

Property Owner: Bridgeland Resources, LLC

General Plan Designation: Industrial

Zoning Designation: M-2, Heavy Manufacturing

Existing Use on Property Undeveloped parcel, contains over 100 active, plugged, idle, and/or cancelled oil wells

Surrounding Land Uses:

The Project site is located to the north of Telegraph Road and west of Santa Fe Springs Road. The site is situated at the east end of Hawkins Street. Hawkins Street is designated as a local street, while Telegraph Road and Santa Fe Springs Road are designated as a major arterials (6 lanes), all within the Circulation Element of the City's General Plan.

Direction	Zone District	General Plan	Use
West	M-1 – Light Manufacturing, Zone & M-2 – Heavy Manufacturing, Zone	Light Industrial & Industrial	Warehouse
East	M-2 – Heavy Manufacturing, Zone	Industrial	Warehouse
North	M-2 – Heavy Manufacturing, Zone	Industrial	Warehouse
South	M-1 – Light Manufacturing, Zone & MU-DT – Mixed-Use Downtown, Zone	Light Industrial & Downtown	Warehouse

Additionally, the subject site is within 500 feet of an Oil & Gas well, and thus, the site is considered to be within the City's Methane Zone.

ANALYSIS

Tentative Parcel Map No. 84502

The proposed Tentative Parcel Map will subdivide the subject parcel (Approx. 26.77 acres) into two parcels:

- **Parcel 1:** Approx. 13.45 acres

- **Parcel 2:** Approx .13.21 acres

It should be noted that a dedication for the cul-de-sac along Hawkins Street is required as part of the Conditions of Approval.

Development Plan Approval (DPA Case No. 1006)

Site Plan

As previously mentioned, the applicant proposes to construct two (2) new concrete tilt-up industrial buildings. Development Plan Approval Case No. 1006 involves a ±298,373 sq. ft. concrete tilt-up, industrial building on Parcel 1 of the proposed subdivision. The building will be set back a minimum of 53 feet from the property line along Hawkins Street. Parking and landscaping will be distributed throughout the site.

Access to Parcel 1 will be provided via two driveways: a proposed 64-foot-wide cul-de-sac driveway on Hawkins Street and an existing 28-foot-wide driveway on Santa Fe Springs Road, through a shared access easement.

The proposed 64-foot-wide cul-de-sac driveway will be located to the west of the project site, originating from Hawkins Street and splitting into two 56-foot-wide onsite driveways. Although each parcel is designed to operate independently, the project includes a shared 26 to 31-foot-wide drive aisle for internal circulation.

The driveway on Santa Fe Springs Road will be restricted to right-in and right-out movements, limited to passenger vehicles only.

Floor Plan

The floor plan indicates that the proposed industrial building will measure ±298.373 sq. ft., with potential 5,000 sq. ft. designated as the first-floor office area, 5,000 sq. ft. as the office mezzanine, and the remaining ±288.373 sq. ft. designated for warehouse/manufacturing area.

Elevations

As illustrated in the elevations, the proposed industrial building will have a contemporary architectural design. The design firm, RGA Architecture, considered the north, west and east elevations and have incorporated a majority of the architectural treatment and features. A few key design elements include window glazing, recess and pop-out, massing variation, decorative form liner, use of stone panels, and colors variation.

Landscape Requirement

For the maximum value, the majority of the landscaping will be provided along the perimeter of the subject site. The project's landscaping calculation consist of the following:

Area	Calculation	Required (sq. ft.)	Provided (sq. ft.)
Frontage	217 linear ft. x 25 sq. ft.	5,425	

Parking	6% of 245,811 sq. ft.	14,749	Total 46,601

The project, therefore, exceeds the minimum landscape requirement set forth in the City's Zoning Code.

Parking Requirements

A total of 345 parking stalls will be provided for the new industrial building: 268 standard stalls, 69 EV stalls and 8 accessible stalls. The project's parking calculation will consist of the following:

Use	Calculation	Required	Provided
Industrial	First 20,000 sq. ft./500	40 stalls	345 stalls
	20,001 sq. ft. – 100,000 sq. ft./750	107 stalls	
	100,001 sq. ft. – 200,000 sq. ft./1,000	100 stalls	
	200,000 sq. ft. and above / 2,000	49 stalls	
	TOTAL	296 STALLS	

The project, therefore, exceeds the minimum parking requirement set forth in the City's Zoning Code.

Loading/ Roll Up Doors

According to the plans, the proposed building will include a total of forty (40) loading doors, one (1) of which will be a grade-level door located along the south elevation. The loading doors are strategically positioned to ensure they are not directly visible from Telegraph Road, Santa Fe Springs Road, or Hawkins Street. Additionally, the applicant will install a 14-foot-high decorative block wall to further screen on-site truck activities.

In accordance with the City's Zoning Code, all off-street truck loading areas, zones, ramps, doors, or docks must be designed to provide and maintain a minimum unobstructed area of 120 feet to allow proper truck maneuvering on-site. As proposed, the project will meet this requirement by providing the necessary unobstructed truck maneuvering space in all required locations.

Trash Enclosures

According to the site plan, a total of 796 sq. ft. of trash enclosure will be required for the proposed project. A total of 850 sq. ft. of trash enclosure will be located at the west side of the trailer stalls parking area, therefore the proposed trash enclosure area will meet the required area. The proposed trash enclosure is strategically placed behind the proposed 14-foot high screen wall and thus, will not be visible or accessible to the public.

Development Plan Approval Case No. 1007

Site Plan

As previously mentioned, the applicant is proposing the construction of two (2) new concrete tilt-up industrial buildings. Development Plan Approval Case No. 1007 includes a new ±286,305 sq. ft. concrete tilt-up, industrial building on Parcel 2 of the proposed subdivision. The building will be setback a minimum of 53 feet from the property line along Hawkins Street. Parking and landscaping will be distributed throughout the site.

Access to Parcel 2 will be provided via two driveways: a proposed 64-foot-wide driveway on Hawkins Street and an existing 28-foot-wide driveway on Telegraph Road through a share access easement.

The proposed 64-foot-wide cul-de-sac driveway will be located to the west of the project site, originating from Hawkins Street and splitting into two 56-foot-wide onsite driveways. While each parcel is designed to operate independently, the project includes a shared 26 to 31-foot-wide drive aisle for internal circulation.

The driveway on Telegraph Road will be restricted to right-in and right-out movements and will be limited to passenger vehicles only.

Floor Plan

The floor plan indicates that the proposed industrial building will measure ±286,305 sq. ft., with potential 5,000 sq. ft. designated as the first-floor office area, 5,000 sq. ft. as the office mezzanine, and the remaining ±276,305 sq. ft. designated for warehouse/manufacturing area.

Elevations

As illustrated in the elevations, the proposed industrial building will have a contemporary architectural design. The design firm, RGA Architecture, considered both south, west, and east elevations and have incorporated a majority of the architectural treatment and features. A few key design elements include window glazing, recess and pop-out, massing variation, decorative form liner, use of stone panels and colors variation.

Landscape Requirement

For the maximum value, the majority of the landscaping will be provided along the perimeter of the subject site. The project's landscaping calculation consist of the following:

Area	Calculation	Required (sq. ft.)	Provided (sq. ft.)
Frontage	183 linear ft. x 25 sq. ft.	4,575	
Parking	6% of 280,568 sq. ft.	16,834	Total 38,409

The project, therefore, exceeds the minimum landscape requirement set forth in the City's Zoning Code.

Parking Requirements

A total of 293 parking stalls will be provided for the new industrial building: 226 standard stalls, 59 EV stalls, and 8 accessible stalls. The project's parking calculation will consist of the following:

Use	Calculation	Required	Provided
Industrial	First 20,000 sq. ft./500	40 stalls	293 stalls
	20,001 sq. ft. – 100,000 sq. ft./750	107 stalls	
	100,001 sq. ft. – 200,000 sq. ft./1,000	100 stalls	
	200,000 sq. ft. and above / 2,000	43 stalls	
	TOTAL	290 STALLS	

The project, therefore, exceeds the minimum parking requirement set forth in the City's Zoning Code.

Loading/ Roll Up Doors

The proposed building will include a total of thirty-six (36) loading doors, one (1) of which will be a grade-level door located along the north elevation. These loading doors are strategically placed to ensure they are not directly visible from Telegraph Road, Santa Fe Springs Road, or Hawkins Street. Additionally, a 14-foot-high decorative block wall will be provided to further screen on-site truck activities.

In compliance with the City's Zoning Code, all off-street truck loading areas, zones, ramps, doors, and docks must maintain a minimum unobstructed area of 120 feet for proper truck maneuvering on-site. The project is designed to meet this requirement by providing the necessary unobstructed truck maneuvering area at all required locations.

Trash Enclosures

According to the site plan, a total of 796 sq. ft. of trash enclosure will be required for the proposed project. A total of 850 sq. ft. of trash enclosure will be located at the west side of the trailer stalls parking area, therefore the proposed trash enclosure area will meet the required area. The proposed trash enclosure is strategically placed behind the proposed 14-foot high screen wall and thus, will not be visible or accessible to the public.

GENERAL PLAN CONSISTENCY

Approval of the proposed project would promote several General Plan Goals and Policies as described in "Table 1" on the following page:

Table 1

General Plan Consistency Analysis

General Plan Element	Policy	Project Consistency
Land Use	Policy LU-3.5: Oil Fields. Encourage efficient and compatible methods for extracting the remaining petroleum resources and the removal of unused oil field equipment and storage facilities.	The proposed project is consistent with Policy LU-3.5, as it facilitates the efficient and compatible transition of the site from former oil extraction operations to modern industrial use. The development includes the removal of all existing oil wells, unused oil field equipment, and storage facilities, by replacing these oil-related uses with two new industrial buildings.
	Policy LU-11.4: Visual Character: Encourage development that enhances the visual character, quality, and uniqueness of residential neighborhoods and commercial and industrial districts.	The proposed project will create two new contemporary industrial buildings with high quality architectural design.
	Policy LU-11.6: Industrial Design: Insist upon distinctive architecture, landscaping, and shade trees along street frontages and on private property that defines the character of industrial and commercial districts.	The project features a high-quality architectural design comprising two (2) new industrial buildings, complemented by an abundance of landscaping. Notably, the landscaping plan includes an extensive coverage along all property lines. This strategic landscaping approach is intended to establish a buffer zone between the industrial facility and the adjacent industrial development.

ENVIRONMENTAL REVIEW

California Environmental Quality Act (CEQA)

The City of Santa Fe Springs, serving as the lead agency, has determined that the proposed project constitutes a "Project" under CEQA and therefore requires the preparation of an Environmental Impact Report (EIR) (State Clearinghouse #2024050495) prior to granting project approval. This determination is based on the potential for the project to have significant impacts on the environment.

The EIR was prepared in compliance with CEQA (California Public Resources Code Section 21000 et seq.), the Guidelines for the California Environmental Quality Act (California Code of Regulations, Title 14, Chapter 3). In accordance with CEQA requirements, the EIR evaluates the direct, indirect, and cumulative environmental impacts associated with the proposed project. It identifies significant impacts, mitigation measures to reduce or avoid those impacts, and feasible alternatives to the proposed project. Additionally, the EIR discloses unavoidable significant impacts, growth-inducing effects, and environmental effects determined not to be significant.

CEQA Compliance

The Environmental Impact Report (EIR) was prepared in compliance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines. A Notice of Preparation (NOP) was circulated from May 13, 2024, to June 12, 2024, to interested parties, agencies, and the public. This process resulted in five (5) written comment letters, which are included in Appendix A of the Draft EIR. A public scoping meeting was held on May 22, 2024, at 5:00 PM in the Santa Fe Springs City Council Chambers; however, no attendees were present.

The Draft EIR was released for a 45-day public review period from November 27, 2024, to January 13, 2025. During this period, four (4) comment letters were received, which are included in Chapter 2, *Response to Comments*, of the Final EIR.

Summary of Environmental Impacts

The Final EIR identifies significant environmental impacts and their corresponding mitigation measures, which are outlined below.

Mitigation Measures

To minimize adverse environmental effects, eight (8) mitigation measures have been recommended to reduce or eliminate potential adverse environmental impacts related to *air quality, geology and soils, hazards and hazardous materials, transportation, and tribal cultural resources* to insignificant levels. Assembly Bill (AB) 3180 requires the adoption of a monitoring and reporting program for these mitigation measures. A copy of the Mitigation Monitoring and Reporting Program is attached as Section 4.0 of the Final EIR (Exhibit B of Attachment E).

Significant and Unavoidable Impact

Section 7.0 of the *Findings of Fact* for the Final EIR (Exhibit C of Attachment E) identifies the following significant and unavoidable impact:

Impact TRA-2: Conflict with CEQA Guidelines § 15064.3, Subdivision (b).

The proposed project would significantly impact home-based work (HBW) vehicle miles traveled (VMT) per employee compared to baseline conditions. In 2024, the project's HBW VMT per employee is estimated to be 26.5, which exceeds the threshold of 18.3 by 44.9 percent. As a result, the project would create both a significant project-level and cumulative impact on VMT.

To reduce this impact, the project would comply with existing regulations and implement CAPCOA measures T-5 through T-11, listed as Mitigation Measure TRA-1. These measures would lower the project's HBW VMT per employee by 23.8 percent. However, even with these reductions, the project's VMT would still exceed baseline and cumulative thresholds, making the impact significant and unavoidable.

Summary of Alternatives Considered

The EIR analyzed three (3) alternatives in Sections 8 of the Draft EIR, including:

- **No Project/No Development Alternative:** Under this alternative, no development would occur, resulting in no significant environmental impacts.
- **Reduced Project Alternative:** This alternative involves a 50% reduction in the proposed project to minimize impacts on air quality. However, the transportation impacts would still be significant and unavoidable.
- **Alternative Use and Buildout Alternative:** This alternative would involve removing Building 2 and developing only Building 1, with manufacturing and accessory office uses. In addition, this alternative would include construction of one storage yard in Parcel 2. While this alternative changes the use of the site, it does not reduce the impact level of any of the 11 environmental topics analyzed in this Draft EIR. Furthermore, impacts to and transportation would continue to be significant and unavoidable. In addition, operation air quality would be potentially significant under this alternative (and less than significant under the proposed Project).

Public Comments and Responses

During the public review period, four (4) comment letters were received from Advocates for The Environment, Southcoast Air Quality Management District, Los Angeles County Sanitation Districts, and State of California Department of Transportation. Responses to these comments have been included in the Chapter 2, *Response to Comments*, of the Final EIR.

Statement of Overriding Considerations

As previously noted, the proposed project results in one significant and unavoidable impact. In accordance with CEQA, the Lead Agency is required to weigh the benefits of the project against its significant and unavoidable environmental impacts to determine whether it should be approved.

Staff finds that the benefits of the proposed project outweigh its unavoidable adverse effects, as outlined in the Statement of Overriding Considerations. The City has also examined alternative approaches to the project, but none of these alternatives meet the project's objectives or are environmentally preferable, as discussed in the Findings and Facts in Support of Findings.

This determination is consistent with CEQA Guidelines Sections 15090–15093 and is further detailed in Section 11.0 of the Findings of Fact for the Final EIR (Exhibit C of Attachment E).

DISCUSSION:

Authority of the Planning Commission

The Planning Commission, after receiving and hearing the results of investigations and reports on the design and improvements of any proposed division of real property for which a tentative map is filed, shall have the authority to impose requirements and conditions upon such division of land and to approve, conditionally approve or disapprove such map and division of land.

Criteria for Granting a Tentative Parcel Map

The Commission should note that in accordance with the State's Subdivision Map Act, before granting a Tentative Parcel Map, the Commission shall give consideration to the following:

- (A) Section 66473.5 and Sections 66474(a) and (b) of the Subdivision Map Act require tentative maps to be consistent with the general plan and specific plans. The proposed Tentative Parcel Map, subject to the attached conditions, is in accordance with the Subdivision Map Act in that.
- (B) Sections 66474(c) and (d) of the Subdivision Map Act require the site to be physically suitable for the type of development and proposed density of development.
- (C) Sections 66474(e) and (f) of the Subdivision Map Act require that the design of the subdivision or the proposed improvements are not likely to cause substantial

environmental damage or substantially and avoidably injure fish or wildlife or their habitat or is likely to cause serious public health concerns.

- (D) Section 66474(g) of the Subdivision Map Act requires that the design of the subdivision or the type of improvements will not conflict with easements, acquired by the public at large, for access through or use of, property within the proposed subdivision.
- (E) In accordance with Government Code Section 66474.6, it has been determined that the discharge of waste from the proposed subdivision, subject to the attached conditions, into the existing sewer system will not result in a violation of the requirements prescribed by the Regional Water Quality Control Board in that the developer is required to comply with the IS/MND Mitigation Monitoring and Reporting Program, submit an erosion control plan and comply with the NPDES Best Management Practices during the grading and construction phases of the project.
- (F) That the proposed subdivision shall be in accordance with Government Code Section 66473.1, entitled “Design of Subdivisions to provide for Future Passive or Natural Heating and Cooling Opportunities.”

Criteria for Granting a Development Plan Approval

The Commission should note that in accordance with Section 155.739 of the City’s Zoning Code, before granting a DPA, the Commission shall give consideration to the following:

- (A) That the proposed project is in conformance with the overall objectives of this chapter.
- (B) That the architectural design of the proposed structures is such that it will enhance the general appearance of the area and be in harmony with the intent of this chapter.
- (C) That the proposed structures be considered on the basis of their suitability for their intended purpose and on the appropriate use of materials and on the principles of proportion and harmony of the various elements of the buildings or structures.
- (D) That consideration be given to landscaping, fencing and other elements of the proposed project to ensure that the entire development is in harmony with the objectives of this chapter.
- (E) That it is not the intent of this subchapter to require any particular style or type of architecture other than that necessary to harmonize with the general area.

- (F) That it is not the intent of this subchapter to interfere with architectural design except to the extent necessary to achieve the overall objectives of this chapter.
- (G) As a means of encouraging residential development projects to incorporate units affordable to extremely low income households and consistent with the city's housing element, the city will waive Planning Department entitlement fees for projects with a minimum of 10% extremely low income units. For purposes of this section, extremely low income households are households whose income does not exceed the extremely low-income limits applicable to Los Angeles County, as published and periodically updated by the state's Department of Housing and Community Development Pursuant Cal. Health and Safety Code § 50106.

SUMMARY

Conditions of Approval

On March 18, 2024, the Community Development Department (“CDD”) circulated a project summary and all application materials to various city departments for their review, comments, and input on the existing conditions of approval. Alongside the CDD's conditions, the Engineering/Public Works, Fire (Environmental & Rescue), Police Services and Waste Management Departments provided additional and modified conditions. A detailed list of these conditions is provided in Conditions of Approval (Exhibit A of Attachment E).

Public Notification

This matter was set for Public Hearing in accordance with the requirements of Sections 65090 and 65091 of the State Planning, Zoning, and Development Laws and the requirements of Sections 155.860 through 155.864 of the City's Municipal Code.

Legal notice of the Public Hearing for the proposed project was sent by first class mail to all property owners whose names and addresses appear on the latest County Assessor's Roll within 500 feet of the exterior boundaries of the subject property on January 30, 2025. The legal notice was also posted in Santa Fe Springs City Hall, the City's Town Center Kiosk, and the City's library, and published in a newspaper of general circulation (Los Cerritos Community Newspaper) on January 31, 2025 as required by the State Zoning and Development Laws and by the City's Zoning Code.

To date, staff has received two public comments regarding the proposed project:

- Cliff Lowy, President of North American Plywood Corporation, submitted an email expressing concerns about a yearly tax he has paid for Hawkins Street, totaling over \$300,000 over the past 25 years. Mr. Lowy believes that, with the new development moving forward, he should be reimbursed for these taxes. Staff has attempted to reach Mr. Lowy for further clarification on the specific yearly tax referenced, but has not yet been able to establish contact.

- Dean Wallraff, Executive Director of Advocates for the Environment, submitted a letter indicating that the organization is withdrawing its January 8, 2025 comment letter and no longer opposes the proposed project.

These comments have been noted and will be considered as part of the project's review process.

ATTACHMENT(S):

- A. Attachment A – Aerial Photograph
- B. Attachment B – Public Hearing Notice
 - a. Email from Cliff Lowy
 - b. Letter from Advocate for the Environment
- C. Attachment C – Radius Map of Public Hearing
- D. Attachment D – Plans
 - a. Tentative Parcel Map
 - b. Site Plan
 - c. Elevation
- E. Attachment E – Resolution No. 281-2025
 - a. Exhibit A - Conditions of Approval
 - b. Exhibit B - Final Environmental Impact Report and Mitigation Monitoring and Reporting Program (MMRP)
 - c. Exhibit C – Findings and Facts
 - d. Exhibit D – Draft Environmental Impact Report

ITEM STATUS:

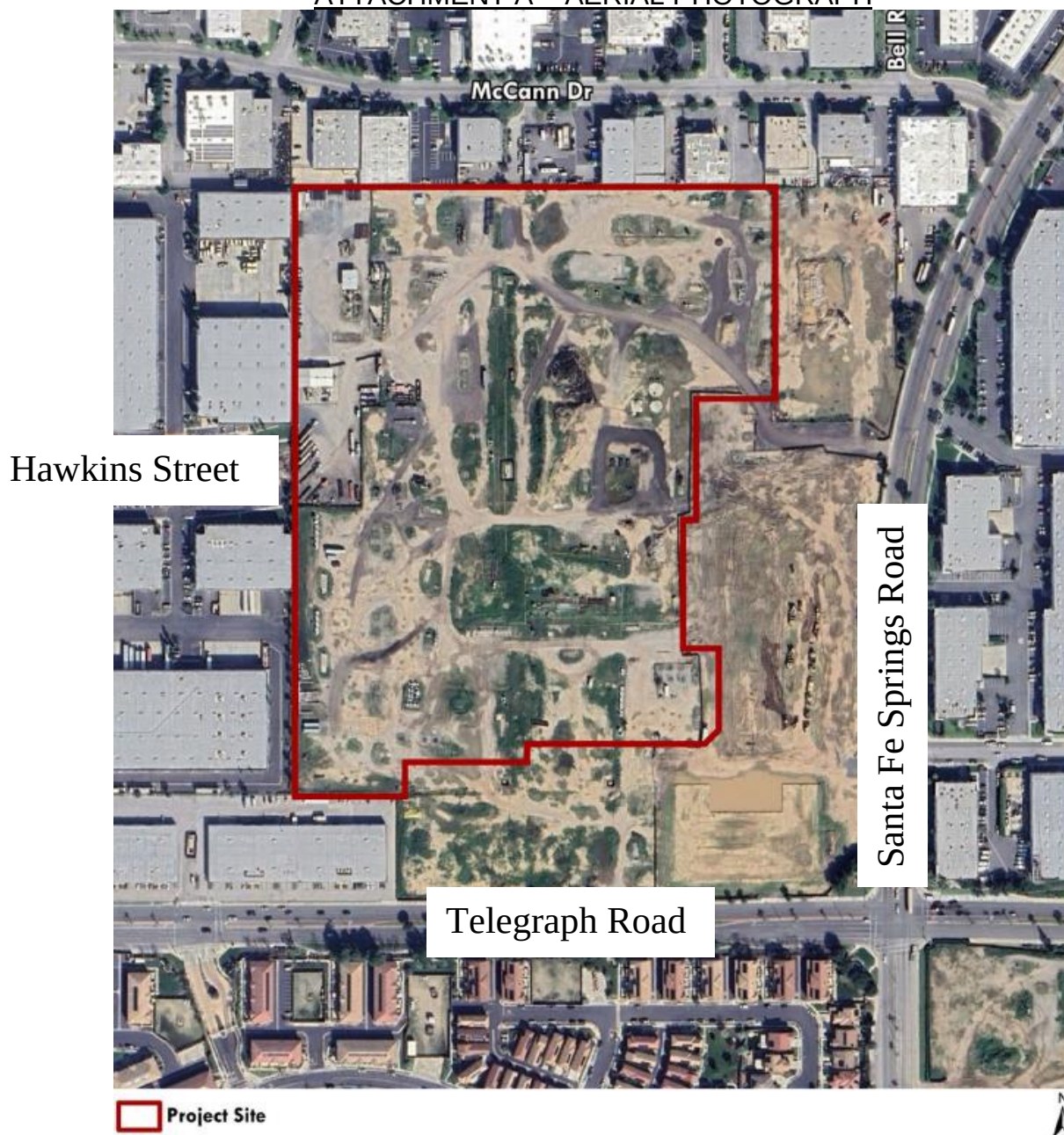
APPROVED: ☐

DENIED: ☐

TABLED: ☐

DIRECTION GIVEN: ☐

ATTACHMENT A – AERIAL PHOTOGRAPH



East end of Hawkins Street (APN: 8005-015-051)
Tentative Parcel Map No. 84502
Development Plan Approval (DPA) Case Nos. 1006 & 1007

ATTACHMENT B – PUBLIC HEARING NOTICE

FILE COPY



11710 Telegraph Road · CA · 90670-3679 · (562) 868-0511 · Fax (562) 868-7112 · www.santafesprings.gov

"A great place to live, work, and play"



**NOTICE OF PUBLIC HEARING
TENTATIVE PARCEL MAP NO. 84502
DEVELOPMENT PLAN APPROVAL CASE NOS. 1006 & 1007**

NOTICE IS HEREBY GIVEN that the Planning Commission of the City of Santa Fe Springs will hold a Public Hearing to consider the following:

TENTATIVE PARCEL MAP NO. 84502: To subdivide an existing 26.77-acre parcel (APN: 8005-015-051) into two parcels and creating a new cul-de-sac at the eastern end of Hawkins Street.

DEVELOPMENT PLAN APPROVAL CASE NO. 1006: To construct a new ±298,373 square-foot concrete tilt-up industrial building and related improvements on Parcel 1.

DEVELOPMENT PLAN APPROVAL CASE NO. 1007: To construct a new ±286,305 square-foot concrete tilt-up industrial building and related improvements on Parcel 2.

PROJECT LOCATION/APPLICANT: East end of Hawkins Street (APN: 8005-015-051) /Bridgeland Resources, LLC.

THE HEARING will be held before the Planning Commission of the City of Santa Fe Springs in the Council Chambers of the City Hall, 11710 Telegraph Road, Santa Fe Springs, on **Tuesday, February 11, 2025 at 6:00 p.m.**

CEQA STATUS: An Environmental Impact Report (EIR) (SCH# 2024050495) has been prepared, which consists of the Draft EIR and Final EIR. The Planning Commission will consider certifying the Final Environmental Impact Report for the proposed project, ensuring compliance with the California Environmental Quality Act.

ALL INTERESTED PERSONS are invited to participate in the Public Hearing and express their opinion on the items listed above. Please note that if you challenge the aforementioned items in court, you may be limited to raising only those issues raised at the Public Hearing, or in written correspondence to the office of the Commission at, or prior to the Public Hearing.

PUBLIC COMMENTS may be submitted in writing to the Community Development Department at City Hall, 11710 Telegraph Road, Santa Fe Springs CA 90670 or, otherwise, e-mail the Planning Commission Secretary, Esmeralda Elise, at: esmeraldaelise@santafesprings.gov. Please submit your written comments by 12:00 p.m. on the day of the Planning Commission meeting. You may also contact the Community Development Department at (562) 868-0511 ext. 7550.

FURTHER INFORMATION on this item may be obtained from Jimmy Wong, Associate Planner, via e-mail at: JimmyWong@santafesprings.gov or otherwise by phone at: (562) 868-0511 ext. 7451.

Exhibit A

From: Cliff Lowy <cliff@naply.com>

Sent: Monday, February 3, 2025 11:19 AM

To: Esmeralda Elise <esmeraldaelise@santafesprings.gov>

Subject: Hawkins Street development

You don't often get email from cliff@naply.com. [Learn why this is important](#)

We own a building on Hawkins street And have been paying a yearly tax for Hawkins street for a total of over \$300,000. Now with this new development coming up I feel we should be reimbursed for this tax which we have paid for close to 25 years. I would like to discuss this with you.

Cliff Lowy
President
North American Plywood Corporation
562 941 7575

Get [Outlook for iOS](#)

Exhibit B

January 31, 2025

Advocates for the Environment

Jimmy Wong
Associate Planner
City of Santa Fe Springs
11710 Telegraph Road
Santa Fe Springs, CA 90670

A non-profit public-interest law firm
and environmental advocacy organization



Via U.S. Mail and email to jimmywong@santafesprings.org

Re: Withdrawal of Comment Letter for the Northwest Corner of Telegraph and Santa Fe Springs Project

Dear Mr. Wong:

Advocates for the Environment hereby withdraws its January 8, 2025 comment letter on the project proposed for the Northwest Corner of Telegraph and Santa Fe Springs Road (the **Project**). We have settled with the developer and no longer oppose the Project.

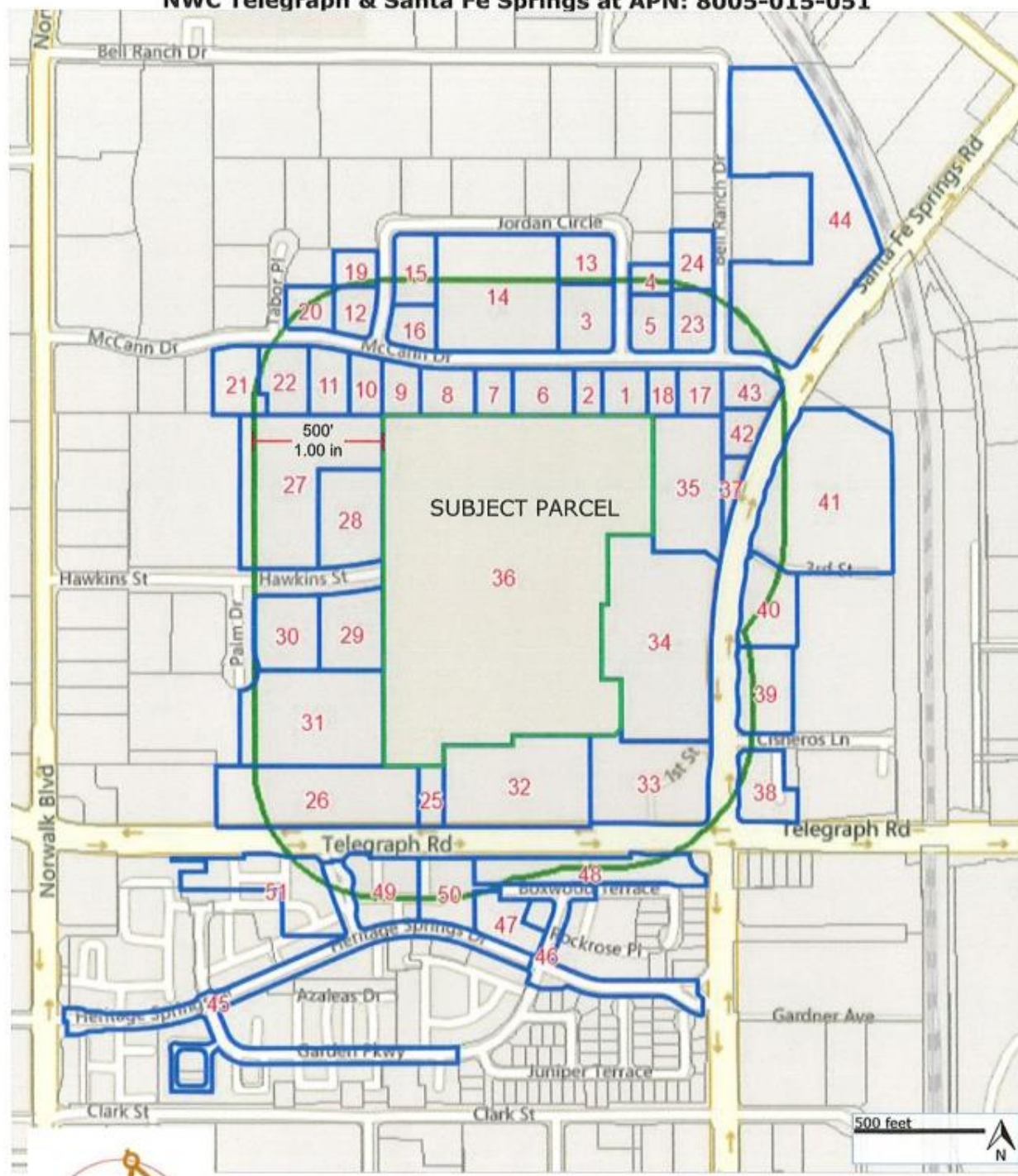
Sincerely,

A handwritten signature in black ink, reading "Dean Wallraff". The signature is fluid and cursive, with the first name "Dean" and last name "Wallraff" clearly distinguishable.

Dean Wallraff, Attorney at Law
Executive Director, Advocates for the Environment

ATTACHMENT C - RADIUS MAP OF PUBLIC HEARING

500' radius
NWC Telegraph & Santa Fe Springs at APN: 8005-015-051



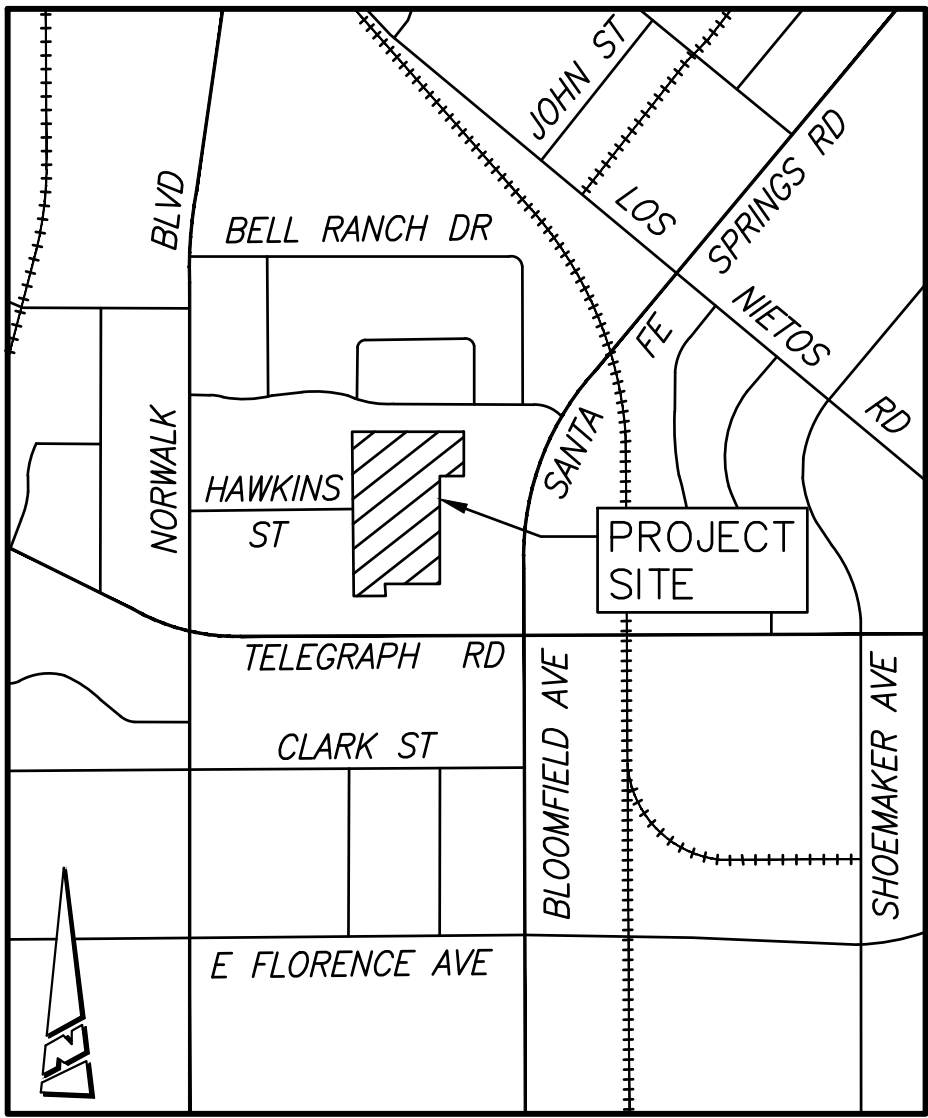
ATTACHMENT D – PLANS

- a. Tentative Parcel Map
- b. Site Plan
- c. Elevation

FILENAME: R:\R316710.01 - EPD - Telegraph Road Industrial\10 CADD & BIM\10.1 AutoCAD\10.1.1 Civil\Exhibits\316710.01 Tentative Parcel Map.dwg Apr 18 2024 3:08pm

TENTATIVE PARCEL MAP NO. 84502

FOR INDUSTRIAL PURPOSES



VICINITY MAP
N.T.S.

OWNER/APPLICANT

BRIDGELAND RESOURCES, LLC
109 NORTH POST OAK LANE,
SUITE 230
HOUSTON, TX 77024

ENGINEER

HUITT-ZOLLARS, INC.
90 E. THOUSAND OAKS BLVD,
SUITE 201
THOUSAND OAKS, CA 91360
PHONE: (805) 418-1802

TOPOGRAPHY SOURCE

ARROWHEAD MAPPING CO.
1887 BUSINESS CENTER DR
SUITE 5A
SAN BERNARDINO, CA 92408
PHONE: (909) 889-2420

APN:

8005-015-051

FLOOD_ZONE

FEMA_ZONE X

LEGAL DESCRIPTION

PER CHICAGO TITLE COMPANY PRELIMINARY REPORT, ORDER NO. 00185115-994-L12-JC, THE SUBJECT PROPERTY IS LOCATED WITHIN THE CITY OF SANTA FE SPRINGS, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

EXISTING PARCEL A:

PARCEL 5 OF PARCEL MAP NO. 78232, IN THE CITY OF SANTA FE SPRINGS, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP FILED IN BOOK 405, PAGES 7 TO 13, INCLUSIVE, OF PARCEL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

BASIS OF BEARINGS

BEARINGS ARE BASED ON THE CENTERLINE OF McCANN DRIVE HAVING A BEARING OF N8950°11'E AS SHOWN ON PARCEL MAP NO. 16527, P.M.B. 174/30-34.

PARCEL INFORMATION

PARCEL 1: 585,786 S.F.
PARCEL 2: 570,151 S.F.

GROSS EXISTING PARCEL SIZE: 1,166,198 S.F. (26.77 AC.)

PRESENT USE:

OIL FIELD

FUTURE USE OF SITE:

TWO INDUSTRIAL WAREHOUSES

LEGEND

	BOUNDARY LINE
	EXISTING PARCEL BOUNDARY
	EASEMENT LINE
	ROW TO BE DEDICATED TO THE CITY OF SANTA FE SPRINGS FOR ROAD PURPOSES

Line Table		
Line #	Length	Direction
L1	50.00'	N58° 38' 22.57"E
L2	50.00'	N81° 31' 56.63"W
L3	12.94'	S78° 19' 14.65"W
L4	41.71'	N0° 01' 38.85"W
L5	23.64'	N0° 01' 38.85"W

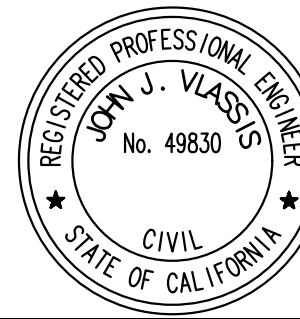
Curve Table			
Curve #	Length	Radius	Delta
C1	31.98'	92.02'	19.91°
C2	134.67'	58.00'	133.04°
C3	87.86'	58.00'	86.79°
C4	31.98'	92.00'	19.91°

BENCHMARK:
LOS ANGELES COUNTY B.M. NO. 0111864 ELEVATION=154.538'

DESCRIPTION:
A LEAD & TACK IN THE NORTH CATCH BASIN, 1 FOOT WEST OF THE ECR OF THE NW CORNER OF TELEGRAPH ROAD & SANTA FE SPRINGS ROAD.



IMPORTANT NOTICE
SECTION 4216/4217 OF THE GOVERNMENT CODE
REQUIRES A DIGALERT IDENTIFICATION NUMBER
BE ISSUED BEFORE A "PERMIT TO EXCAVATE"
WILL BE VALID. FOR YOUR DIGALERT I.D. NUMBER
CALL UNDERGROUND SERVICE ALERT
TOLL FREE: 811
TWO WORKING DAYS BEFORE YOU DIG



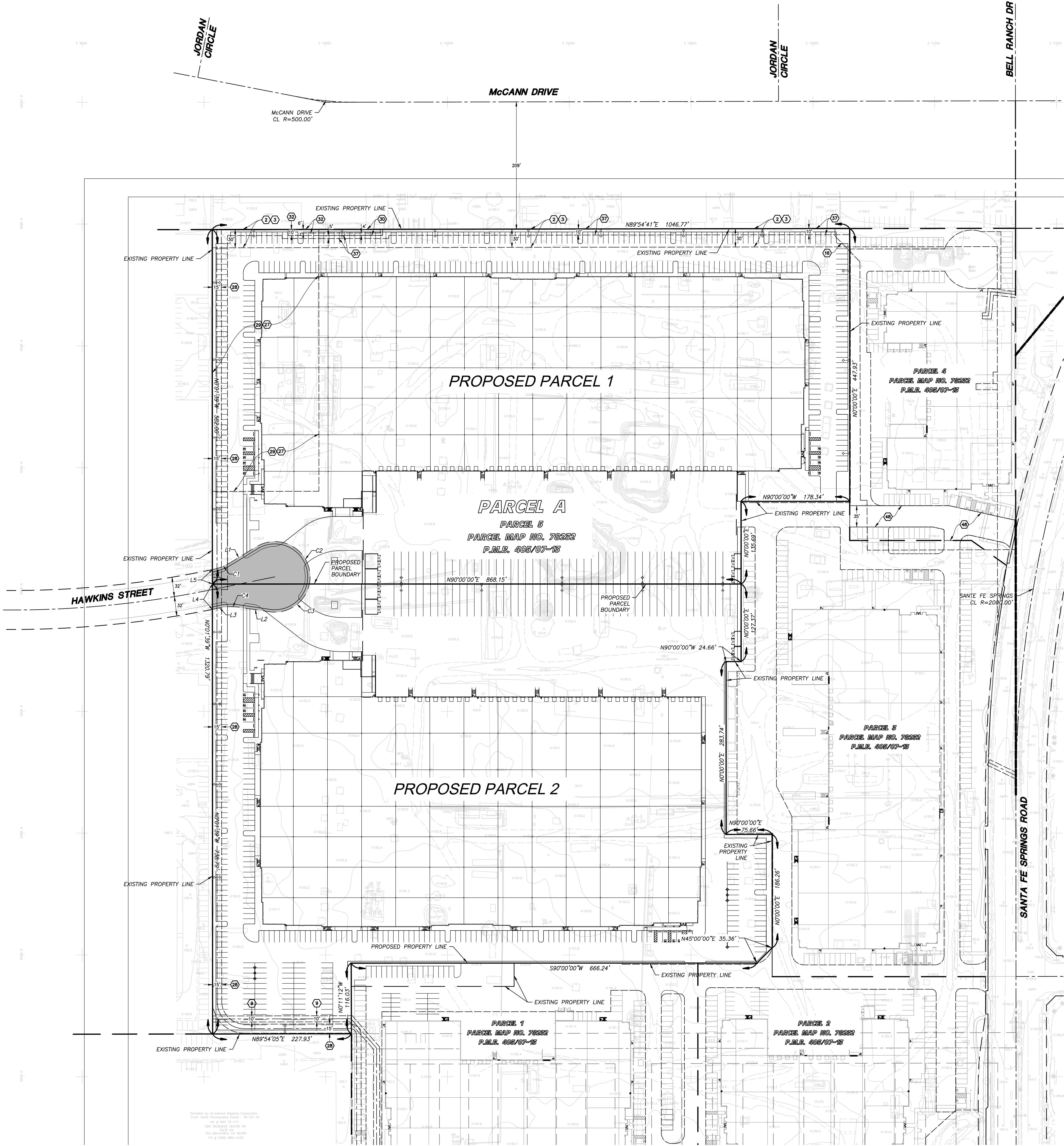
NO	REVISION	PREP.	APPVD.	DATE

PREPARED BY:
HUITT ZOLLARS
90 E. Thousand Oaks Boulevard, Suite 201
Thousand Oaks, California 91360
Phone (805) 418-1802 Fax (805) 418-1819

PREPARED FOR:
BRIDGELAND RESOURCES
BRIDGELAND RESOURCES, LLC
109 NORTH POST OAK LANE, SUITE 230
HOUSTON, TX 77024

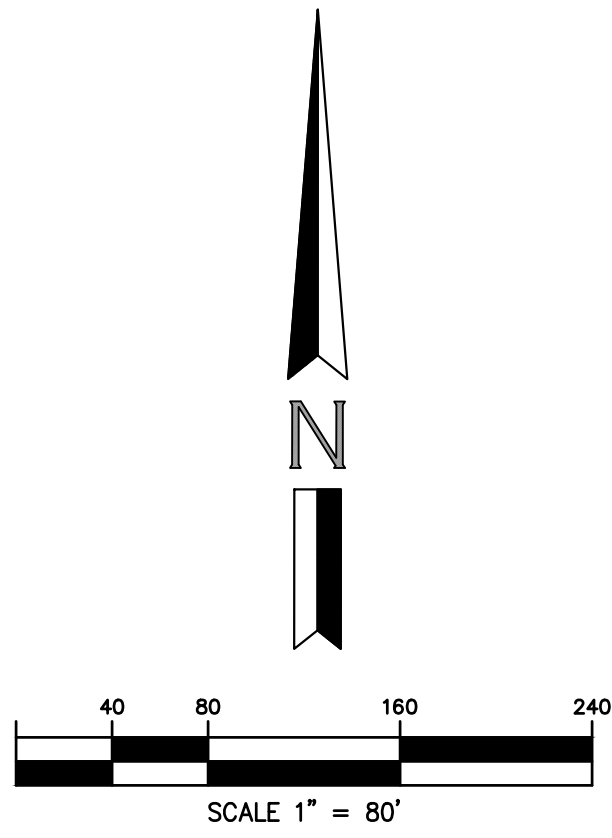
CITY OF SANTA FE SPRINGS
PM 84502
TENTATIVE PARCEL MAP
NWC TELEGRAPH RD & SANTA FE SPRINGS RD
SANTA FE SPRINGS, CA

SHEET NUMBER
1 OF **1**



EXISTING EASEMENTS

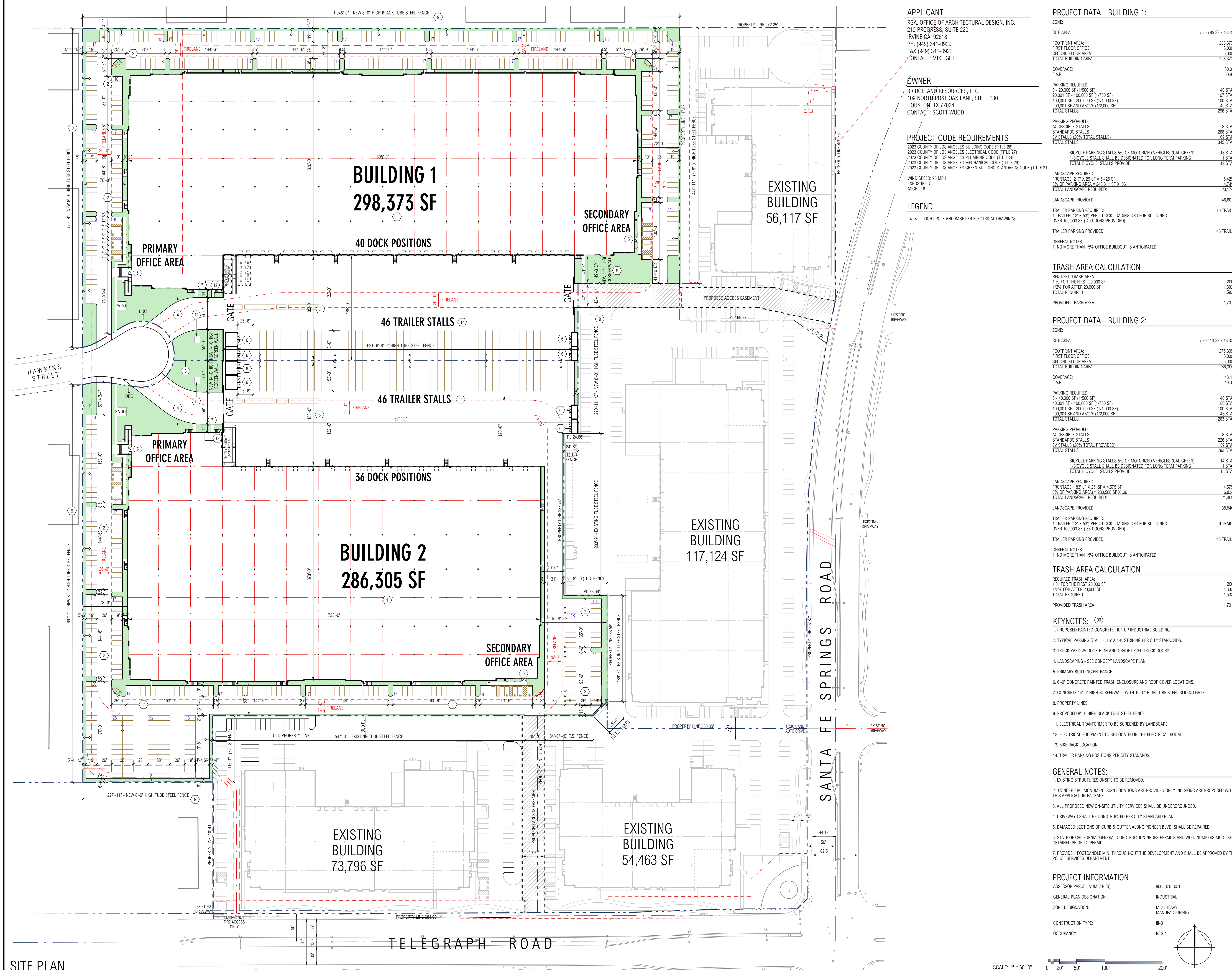
- AN EASEMENT IN FAVOR OF SANTA GERTURDES LAND ASSOCIATION FOR ROADS, RAILROADS, DITCHES AND WATER COURSES PURPOSES RECORDED MARCH 8, 1879 AS BOOK 66 PAGE 619, OF DEEDS.
- AN EASEMENT IN FAVOR OF SANTA GERTURDES LAND ASSOCIATION FOR ROADS, RAILROADS, DITCHES AND WATER COURSE PURPOSES RECORDED JUNE 19, 1883 AS BOOK 109 PAGE 50, OF DEEDS.
- AN EASEMENT IN FAVOR OF UNION OIL COMPANY OF CALIFORNIA FOR PIPE LINES FOR THE TRANSPORTATION OF OIL, GAS, WATER AND OTHER SUBSTANCES AND INCIDENTAL PURPOSES RECORDED FEBRUARY 17, 1931 AS BOOK 10606 PAGE 313, OF OFFICIAL RECORDS.
- THE TERMS AND PROVISIONS CONTAINED IN THE DOCUMENT ENTITLED "LICENSE AGREEMENT" RECORDED JUNE 18, 1957 AS INSTRUMENT NO. 2039 OF OFFICIAL RECORDS. (DUE TO ILLEGIBILITY OF DOCUMENT, CONFIGURATION PLOTTED HEREON IS APPROXIMATE)
- THE TERMS AND PROVISIONS CONTAINED IN THE DOCUMENT ENTITLED "LICENSE AGREEMENT EXCHANGE" RECORDED DECEMBER 3, 1984 AS INSTRUMENT NO. 84-1420222 OF OFFICIAL RECORDS.
- AN EASEMENT IN FAVOR OF THE CITY OF SANTA FE SPRINGS FOR STORM DRAIN AND INCIDENTAL PURPOSES, RECORDED DECEMBER 19, 1984 AS INSTRUMENT NO. 84-1482920 OF OFFICIAL RECORDS.
- THE TERMS AND PROVISIONS CONTAINED IN THE DOCUMENT ENTITLED "LICENSE AGREEMENT" EXCHANGE RECORDED DECEMBER 3, 1984 AS INSTRUMENT NO. 84-1420222, OF OFFICIAL RECORDS.
- AN EASEMENT IN FAVOR OF UNION OIL COMPANY OF CALIFORNIA FOR PIPELINES PURPOSES RECORDED MARCH 5, 1985 AS INSTRUMENT NO. 85-244990, OF OFFICIAL RECORDS.
- AN EASEMENT IN FAVOR OF SOUTHERN CALIFORNIA EDISON COMPANY FOR UNDERGROUND ELECTRICAL SUPPLY SYSTEMS AND COMMUNICATION SYSTEMS AND INCIDENTAL PURPOSES, RECORDED DECEMBER 6, 1985 AS INSTRUMENT NO. 85-1443766 OF OFFICIAL RECORDS.
- AN EASEMENT GRANTED TO OMEGA OIL LLC, A DELAWARE LIMITED LIABILITY COMPANY FOR PIPELINES AND RELATED INFRASTRUCTURE PURPOSES RECORDED MAY 20, 2021 AS INSTRUMENT NO. 2021-812622, OFFICIAL RECORDS.
- A NON-EXCLUSIVE EASEMENT FOR TRUCK, VEHICULAR AND PEDESTRIAN INGRESS AND EGRESS, MORE PARTICULARLY DESCRIBED IN THE DOCUMENT ENTITLED "DRIVEWAY EASEMENT AGREEMENT", DATED MAY 20, 2021, AND RECORDED MAY 20, 2021 AS INSTRUMENT NO. 20210812621, OF OFFICIAL RECORDS.



CD		
BID		
PC		
DD		
SD	04/19/24	SCHEMATIC DESIGN
MARK	DATE	DESCRIPTION

RGD PROJECT NO:	22100-00
OWNER PROJECT NO:	00000.00
CAD FILE NAME:	22100-00-A1-01P
DRAWN BY:	JH
CHK'D BY:	JH

COPYRIGHT
RGA, OFFICE OF ARCHITECTURAL DESIGN
SHEET TITLE



CD		
BID		
FC		
DD		
SD	04/19/24	SCHEMATIC DESIGN
MARK	DATE	DESCRIPTION

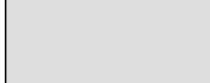
RG	PROJECT NO:	22100-00
OWNER	PROJECT NO:	00000.00
CAD	FILE NAME:	22100-00-A3-01P-1
DRAWN	BY:	JH
CHKD	BY:	JH
COPYRIGHT	RG, OFFICE OF ARCHITECTURAL DESIGN	

SHEET TITLE
EXTERIOR ELEVATIONS
BUILDING 1

NOTES:

1. ALL ROOFTOP MECH. EQUIPMENT SHALL BE SCREENED FROM VIEW.
2. PROVIDE GRAFFITI RESISTANT COATING TO A HEIGHT OF 12 FEET ON THE WEST ELEVATION.

FINISH SCHEDULE:

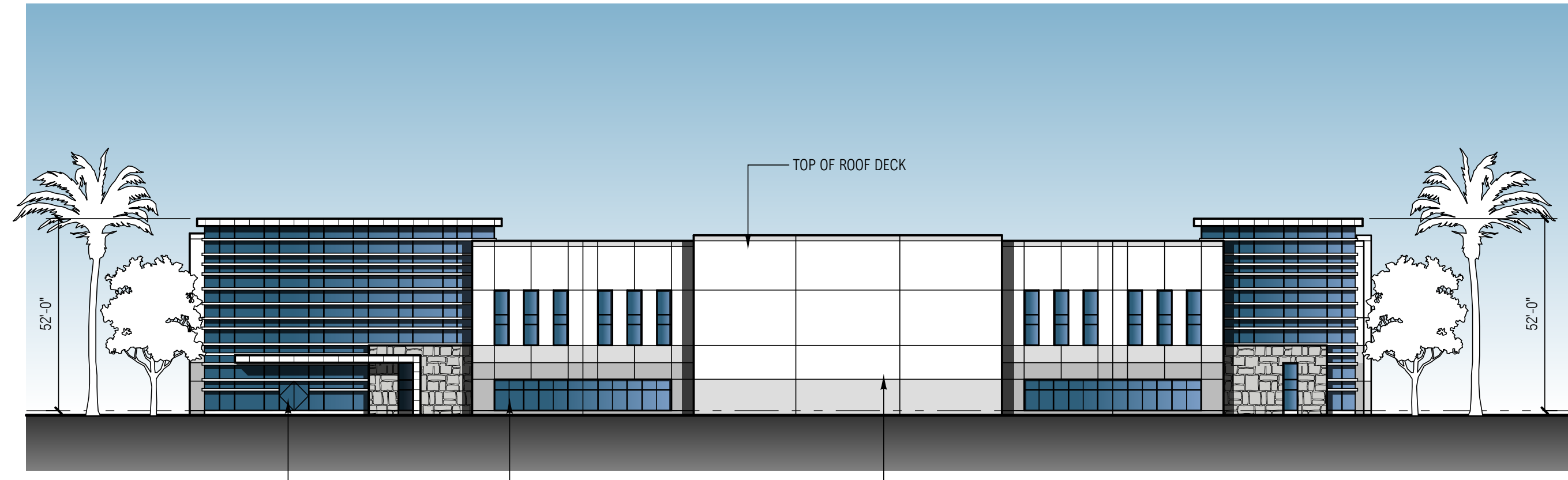
	1. FIELD COLOR FRAZEE - CL 3211W - WASH BASIN
	2. LIGHT ACCENT COLOR FRAZEE - CL 3214M - WAVELENGTH
	3. DARK ACCENT COLOR FRAZEE - CL 3215D - ELF
	4. DARK ACCENT COLOR FRAZEE - CL 3216A - BRAINCHILD
	5. CANOPIES - ALUCOBOND: CLEAR ANODIZED FINISH
	6. GLASS - PRIMARY WINDOW PPG SOLARCOOL PACIFICA



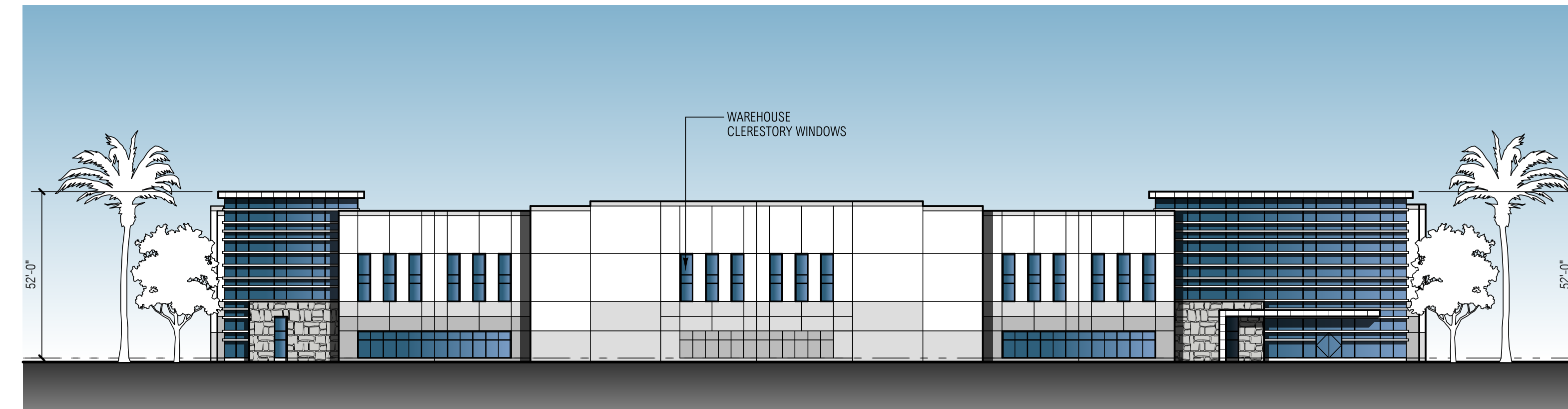
SIMILAR SITE LIGHTING STYLE
SCALE: N.T.S.



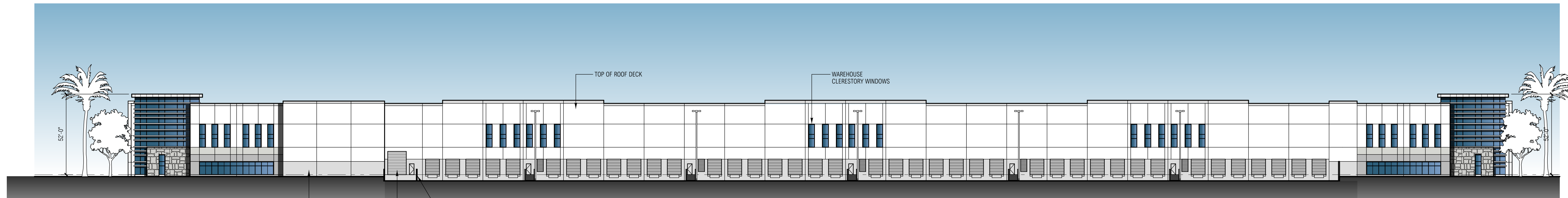
SIMILAR ENTRY LIGHTING STYLE
SCALE: N.T.S.



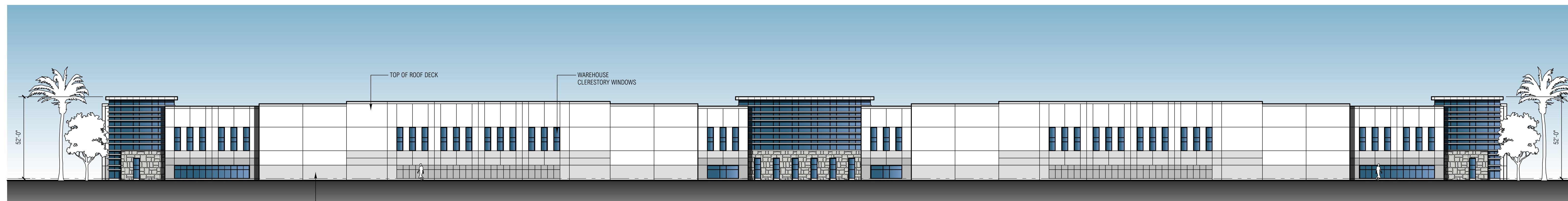
EAST ELEVATION
SCALE: 1" = 30'-0"



WEST ELEVATION
SCALE: 1" = 30'-0"



SOUTH ELEVATION
SCALE: 1" = 30'-0"



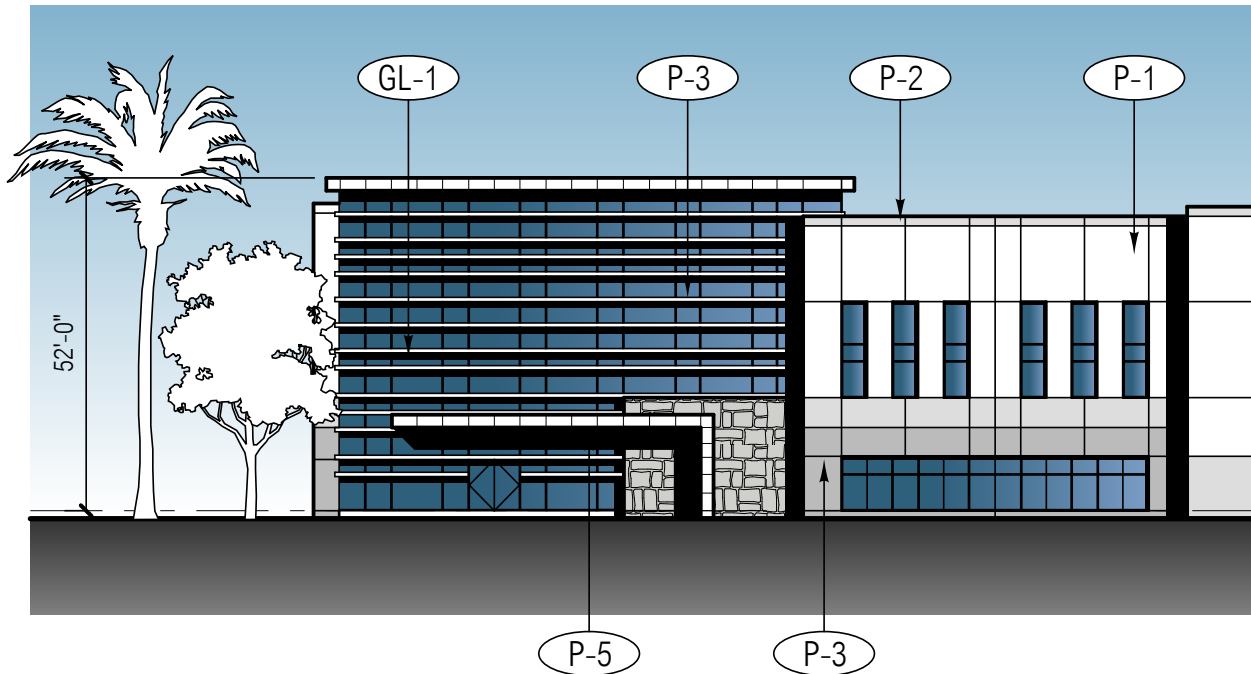
NORTH ELEVATION
SCALE: 1" = 30'-0"

BRIDGELAND RESOURCES, LLC
109 NORTH POST OAK LANE, SUITE 230
HOUSTON, TX 77024
ATTN: SCOTT WOOD

CD		
BID		
PC		
DD		
SD	04/19/24	SCHEMATIC DESIGN
MARK	DATE	DESCRIPTION

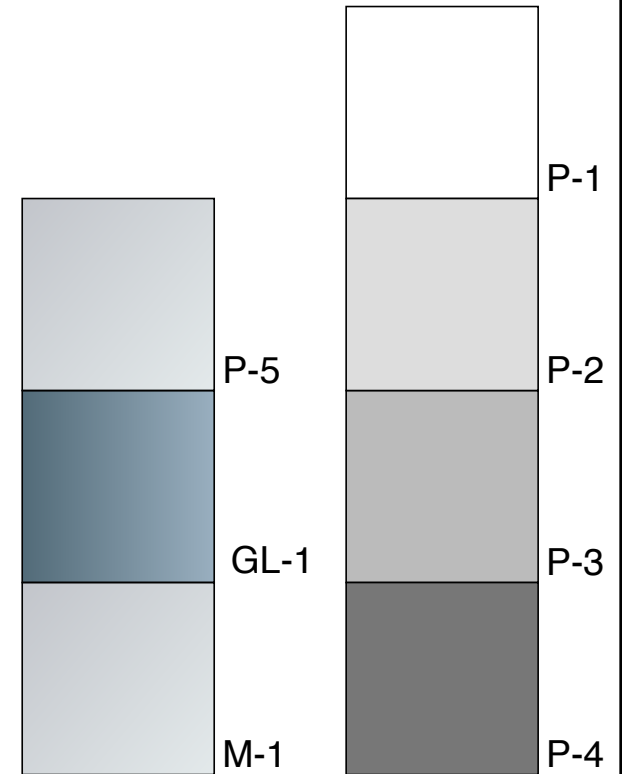
RGD PROJECT NO:	22100-00
OWNER PROJECT NO:	00000.00
CAD FILE NAME:	22100-00-A3-02P
DRAWN BY:	JH
CHK'D BY:	JH
COPYRIGHT	
RGD, OFFICE OF ARCHITECTURAL DESIGN	

EXTERIOR ELEVATION BLOW-UPS



PARTIAL ENTRY ELEVATION

SCALE 1" = 20'-0"



FINISH SCHEDULE

CODE	MATERIAL	DESCRIPTION
P-1	FIELD COLOR	COLOR: FRAZEE CL 3211W WASH BASIN
P-2	ACCENT COLOR	COLOR: FRAZEE CL 3214M WAVELENGTH
P-3	ACCENT COLOR	COLOR: FRAZEE CL 3215D ELF
P-4	ACCENT COLOR	COLOR: FRAZEE CL 3216A BRAINCHILD
P-5	CANOPY ALUCOBOND	COLOR: CLEAR ANODIZED
GL-1	GLAZING	BLUE REFLECTIVE GLAZING - PPG SOLARCOOL PACIFICA
M-1	MULLIONS	CLEAR ANODIZED ALUMINUM

TELEGRAPH AND SANTA FE
SPRINGS ROAD
OFFICE / WAREHOUSE

000 HAWKINS STREET
SANTA FE SPRINGS, CA

RGA

Office of Architectural Design

210 Progress, Suite 220
Irvine, CA 92618

T 949-341-0920
FX 949-341-0922

ATTACHMENT E – RESOLUTION NO. 281-2025

Exhibit A - Conditions of Approval

Exhibit B - Final Environmental Impact Report and Mitigation Monitoring and Reporting
Program (MMRP)

Exhibit C – Findings and Facts

Exhibit D – Draft Environmental Impact Report

CITY OF SANTA FE SPRINGS
RESOLUTION NO. 281-2025

**A RESOLUTION OF THE PLANNING COMMISSION OF
THE CITY OF SANTA FE SPRINGS REGARDING
TENTATIVE PARCEL MAP (TPM) NO. 84502
DEVELOPMENT PLAN APPROVAL (DPA) CASE NOS. 1006 & 1007**

WHEREAS, a request was filed for TPM No. 84502 to subdivide an existing 26.77-acre parcel (APN: 8005-015-051) into two parcels and creating a new cul-de-sac at the eastern end of Hawkins Street; and

WHEREAS, a request was filed for DPA Case No. 1006 to construct a new ±298,373 square-foot concrete tilt-up industrial building and related improvements on Parcel 1; and

WHEREAS, a request was filed for DPA Case No. 1007 to construct a new ±286,305 square-foot concrete tilt-up industrial building and related improvements on Parcel 2; and

WHEREAS, the subject property is located on the east end of Hawkins Street, with Assessor Parcel Numbers of 8005-015-051, as shown in the latest rolls of the Los Angeles County Office of the Assessor; and

WHEREAS, the property owner is Bridgeland Resources, LLC, 109 N. Post Oak Lane, Suite 230, Houston, Texas 77024; and

WHEREAS, the applicant is EPD Solutions, Inc., on behalf of Bridgeland Resources, LLC.; and

WHEREAS, the proposed development which includes TPM No. 84502, DPA Case No. 1006 and DPA Case No. 1007 is considered a project as defined by the California Environmental Quality Act (CEQA), Article 20, Section 15378(a); and

WHEREAS, based on information provided by the applicant and staff's assessment, it was determined that the proposed development requires the preparation of an Environmental Impact Report (EIR) (State Clearinghouse #2024050495) due to the potential for significant environmental impacts; and

WHEREAS, the City of Santa Fe Springs Community Development Department on January 31, 2025 published a legal notice in the *Los Cerritos Community Newspaper*, a local paper of general circulation, indicating the date and time of the public hearing, and also mailed said public hearing notice on January 30, 2025 to each property owner within a 500-foot radius of the project site in accordance with state law; and

WHEREAS, the City of Santa Fe Springs Planning Commission has considered the application, the written and oral staff report, the General Plan, and zoning of the

subject property, the testimony, written comments, or other materials presented at the Planning Commission meeting on February 11, 2025 concerning TPM No. 84502, DPA Case No. 1006, DPA No. 1007, and Final EIR.

NOW, THEREFORE, be it RESOLVED that the PLANNING COMMISSION of the CITY OF SANTA FE SPRINGS does hereby RESOLVE, DETERMINE and ORDER AS FOLLOWS:

SECTION I. ENVIRONMENTAL FINDINGS AND DETERMINATION

The Planning Commission finds that the proposed project is subject to the provisions of the California Environmental Quality Act (CEQA). A Draft Environmental Impact Report (EIR) and Final EIR (State Clearinghouse No. 2024050495), inclusive of the Mitigation Monitoring and Reporting Program (MMRP), Findings of Fact pursuant to CEQA Guidelines Section 15091, and a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093, were prepared for the Project. These documents are on file with the Community Development Department, available online at (https://www.santafesprings.gov/departments/planning_and_development_department/planning/environmental_documents.php) , and are incorporated herein by reference.

Based on substantial evidence in the record, the Planning Commission finds as follows pursuant to CEQA Guidelines §15080 et seq.:

A) *Certification of Environmental Impact Report*

The Planning Commission, having reviewed and considered the EIR and its preparation and review process, hereby certifies that:

1. The EIR has been completed in compliance with CEQA;
2. The Planning Commission has reviewed and considered the information contained in the EIR prior to approving the Project; and
3. The EIR reflects the City's independent judgment and analysis.

B) *Adoption of Findings of Fact*

The Planning Commission accepts, adopts, and incorporates by reference, as if fully set forth herein, the Findings of Fact contained in the Final EIR.

C) *Mitigation Monitoring and Reporting Program*

The Final EIR includes a Mitigation Monitoring and Reporting Program (MMRP) in compliance with applicable state law. The Planning Commission finds that:

1. The MMRP is designed to ensure proper implementation of the Project's mitigation measures during Project construction and operation.

2. The MMRP identifies responsibilities for the City and other responsible parties to implement and monitor the mitigation measures outlined in the Final EIR and Findings of Fact.
3. The mitigation measures identified in the MMRP are feasible, incorporated into the Project conditions of approval (see Exhibits A), and will become binding upon the Applicant or Developer upon final Project approval in accordance with CEQA Guidelines Section 15097.

D) *Statement of Overriding Considerations*

The Planning Commission finds that, for each significant and unavoidable environmental impact identified in the EIR, mitigation measures and project alternatives are infeasible due to specific considerations. Furthermore, the Planning Commission finds that the benefits of the proposed Project outweigh its unavoidable adverse effects, as detailed in the Statement of Overriding Considerations, consistent with CEQA Guidelines Sections 15090–15093.

SECTION II. TENTATIVE PARCEL MAP FINDINGS

Pursuant to the State's Subdivision Map Act, the Planning Commission has made the following findings:

- A) *Section 66473.5 and Sections 66474(a) and (b) of the Subdivision Map Act require tentative maps to be consistent with the general plan and specific plans. The proposed Tentative Parcel Map, subject to the attached conditions, is in accordance with the Subdivision Map Act in that:*

Approval of the proposed Parcel Map would promote a number of specific General Plan Goal and Policies as described in “Table 1” on the following page:

Table 1
General Plan Consistency Analysis

General Plan Element	Policy	Project Consistency
Land Use	Policy LU-3.5: Oil Fields. Encourage efficient and compatible methods for extracting the remaining petroleum resources and the removal of unused oil field equipment and storage facilities.	The proposed project is consistent with Policy LU-3.5, as it facilitates the efficient and compatible transition of the site from former oil extraction operations to modern industrial use. The development includes the removal of all existing oil wells, unused oil field equipment, and storage facilities, by replacing these

		oil-related uses with two new industrial buildings.
	Policy LU-11.4: Visual Character: Encourage development that enhances the visual character, quality, and uniqueness of residential neighborhoods and commercial and industrial districts.	The proposed project will create two new contemporary industrial buildings with high quality architectural design.
	Policy LU-11.6: Industrial Design: Insist upon distinctive architecture, landscaping, and shade trees along street frontages and on private property that defines the character of industrial and commercial districts.	The project features a high-quality architectural design comprising two (2) new industrial buildings, complemented by an abundance of landscaping. Notably, the landscaping plan includes an extensive coverage along all property lines. This strategic landscaping approach is intended to establish a buffer zone between the industrial facility and the adjacent industrial development.

The proposed parcel map, subject to the attached conditions of approval, is compatible with the goals and objectives of the City of Santa Fe Spring's General Plan, and therefore, is in compliance with Government Code Sections 66473.5, and 66474(a) and (b).

- B) Sections 66474(c) and (d) of the Subdivision Map Act require the site to be physically suitable for the type of development and proposed density of development.

In addition to the proposed parcel map, the applicant is concurrently seeking approval of DPA Case No. 1006 & 1007, to allow for the construction of a new ±298,373 sq. ft. concrete tilt-up industrial building (Parcel 1) and a new ±286,305 sq. ft. concrete tilt-up industrial building (Parcel 2), located at east end of Hawkins Street. As proposed, the new development will meet or exceed all requirements of the City's Zoning Code and as a result will not require any variances. Therefore, the subject site is physically suitable for the proposed development.

- C) Sections 66474(e) and (f) of the Subdivision Map Act require that the design of the subdivision or the proposed improvements are not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat or is likely to cause serious public health concerns.

The proposed development constitutes a "Project" under CEQA and therefore requires the preparation of an EIR (State Clearinghouse #2024050495) prior to granting project approval. This determination is based on the potential for the project to have significant impacts on the environment. The biological resources have been reviewed as part of the Final EIR.

- D) Section 66474(g) of the Subdivision Map Act requires that the design of the subdivision or the type of improvements will not conflict with easements, acquired by the public at large, for access through or use of, property within the proposed subdivision.

In addition to the proposed tentative parcel map, the project is required to obtain Development Plan Approval for the two proposed buildings. As part of the DPA process, the design of the subdivision and proposed improvements are carefully reviewed or otherwise coordinated to avoid any conflicts with easements acquired by the public at large, granting access through or use of the property within the proposed subdivision. All proposed improvements will therefore be situated outside any existing onsite easements. If necessary, new easements for utility or roadways will be provided before final map approval.

- E) In accordance with Government Code Section 66474.6, it has been determined that the discharge of waste from the proposed subdivision, subject to the attached conditions, into the existing sewer system will not result in a violation of the requirements prescribed by the Regional Water Quality Control Board in that the developer is required to comply with the IS/MND Mitigation Monitoring and Reporting Program, submit an erosion control plan and comply with the NPDES Best Management Practices during the grading and construction phases of the project.

As a required condition of approval, the project is required to meet all federal, state, and local ordinances and requirements including, but not limited to, the California Regional Water Quality Control Board.

- F) That the proposed subdivision shall be in accordance with Government Code Section 66473.1, entitled "Design of Subdivisions to provide for Future Passive or Natural Heating and Cooling Opportunities."

Future passive or natural heating and cooling opportunities will be incorporated with the proposed development. To the extent feasible, staff will review the proposed development to ensure that energy-saving devices or materials, including, but not limited to, insulation, double-pane windows, and high efficiency central heating and cooling systems will be incorporated.

SECTION III: DEVELOPMENT PLAN APPROVAL FINDINGS

Pursuant to Section 155.739 of the City of Santa Fe Springs Zoning Code, the Planning Commission shall consider the following findings in their review and determination of the subject Development Plan Approval. Based on the available information, the City of Santa Fe Springs Planning Commission hereby make the following findings:

(A) *That the proposed development is in conformance with the overall objectives of this chapter.*

The proposed project is located within the M-2 (Heavy Manufacturing) Zone. Pursuant to Section 155.240 of the Zoning Code, "The purpose of the M-2 Zone is to preserve the lands of the city appropriate for heavy industrial uses, to protect these lands from intrusion by dwellings and inharmonious commercial uses, to promote uniform and orderly industrial development, to create and protect property values, to foster an efficient, wholesome and aesthetically pleasant industrial district, to attract and encourage the location of desirable industrial plants, to provide an industrial environment which will be conducive to good employee relations and pride on the part of all citizens of the community and to provide proper safeguards and appropriate transition for surrounding land uses."

The proposed project demonstrates consistency with the objectives of the M-2 Zone through the following points:

1. The property's zoning as M-2 and its designation in the General Plan for Industrial use affirm its suitability for industrial activities.
2. By introducing two concrete tilt-up industrial buildings, the project actively upholds the land's intended industrial purpose.
3. By constructing two attractive industrial buildings on an undeveloped parcel with over 100 active, plugged, idle, and/or canceled oil wells, the project will significantly enhance the property's assessed value. This improvement is expected to positively impact property values for both the subject property and neighboring properties.
4. The two new industrial buildings offer contemporary features such as increased ceiling height and energy-efficient elements, designed to attract and accommodate local industrial enterprises.

(B) *That the architectural design of the proposed structures is such that it will enhance the general appearance of the area and be in harmony with the intent of this chapter.*

As previously mentioned, the project site is currently an undeveloped parcel with over 100 active, plugged, idle, and/or canceled oil wells. The applicant is proposing to construct two new industrial buildings designed with variations in setbacks, height, glazing, color, and materials. The result is a visually appealing and contemporary development that is comparable to other high-quality office and industrial projects in Santa Fe Springs.

- (C) That the proposed structures be considered on the basis of their suitability for their intended purpose and on the appropriate use of materials and on the principles of proportion and harmony of the various elements of the buildings or structures.

The proposed two industrial buildings have been thoughtfully designed to ensure their suitability for their intended purpose as warehouses. Although designed as speculative buildings, they incorporate varied exterior finishes and subtle architectural details to enhance their visual appeal. These design elements effectively break up the massing of the buildings with elevation pop-out and glazing, resulting in a balanced and harmonious composition. The use of high-quality, appropriate materials further enhances the overall design of the buildings, aligning with the principles of proportion and harmony.

- (D) That consideration be given to landscaping, fencing and other elements of the proposed development to ensure that the entire development is in harmony with the objectives of this chapter.

Considerable attention has been given to ensuring compliance with the City's Zoning Code throughout the planning of the proposed project. Landscaping efforts will be focused along Hawkins Street to enhance views of the project site from the street. Additionally, while the subject site is surrounded by adjacent industrial buildings that obstruct visibility from Telegraph Road and Santa Fe Springs Road, landscaping is proposed along the property lines to further enhance the site's overall appearance.

In addition, all loading and unloading doors have been strategically positioned to remain discreet and out of public view. To further screen activities within the interior yard, a 14-foot-high screen wall and a 10-foot-high metal gate with perforated metal mesh will be installed. Finally, the trash enclosures have been carefully located to minimize visibility and public accessibility while reducing potential impacts on neighboring properties.

- (E) That it is not the intent of this subchapter to require any particular style or type of architecture other than that necessary to harmonize with the general area.

As stated previously, the proposed buildings are contemporary in design. The architect used variations in the mass, materials, and color. The style and architecture of the proposed building is therefore consistent with other high-quality office/industrial projects in the general area.

- (F) That it is not the intent of this subchapter to interfere with architectural design except to the extent necessary to achieve the overall objectives of this chapter.

Pursuant to Section 155.736 of the Zoning Code "The purpose of the development plan approval is to assure compliance with the provisions of this chapter and to give proper attention to the siting of new structures or additions or alterations to

existing structures, particularly in regard to unsightly and undesirable appearance, which would have an adverse effect on surrounding properties and the community in general.” The Planning Commission believes that proper attention has been given to the location, size, and design of the proposed building, the project complies with all development standards within the M-2 Zone. The Planning Commission, therefore, finds that the two new contemporary industrial buildings are well-designed and thus will be an enhancement to the overall area.

- (G) As a means of encouraging residential development projects to incorporate units affordable to extremely low income households and consistent with the city's housing element, the city will waive Planning Department entitlement fees for projects with a minimum of 10% extremely low income units. For purposes of this section, extremely low income households are households whose income does not exceed the extremely low-income limits applicable to Los Angeles County, as published and periodically updated by the state's Department of Housing and Community Development Pursuant Cal. Health and Safety Code § 50106.

The Planning Commission finds that the proposed project is not a residential development; therefore, the requirements pertaining to low-income units do not apply.

SECTION IV. PLANNING COMMISSION ACTION

The Planning Commission hereby adopts Resolution No. 281-2025, certifying the Final Environmental Impact Report (EIR) and approving the associated Mitigation Monitoring and Reporting Program (MMRP), Findings of Fact as required by CEQA Guidelines Section 15091, and the Statement of Overriding Considerations. Furthermore, the Planning Commission approves Tentative Parcel Map (TPM) No. 84502, Development Plan Approval (DPA) Case No. 1006, and DPA Case No. 1007, subject to the conditions set forth in Exhibit A.

ADOPTED and APPROVED this 11th day of February 2025 BY THE PLANNING COMMISSION OF THE CITY OF SANTA FE SPRINGS.

Jay Sarno, Chairperson

ATTEST:

Esmeralda Elise, Planning Commission Secretary

Resolution No. 281-2025 – Attachments:

Exhibit A - Conditions of Approval

Exhibit B - Final Environmental Impact Report and Mitigation Monitoring and Reporting Program (MMRP)

Exhibit C – Findings and Facts

Exhibit D – Draft Environmental Impact Report

Exhibit A – Conditions of Approval
Tentative Parcel Map No. 84502,
Development Plan Approval Case No. 1006 & DPA 1007
(NWC Telegraph Rd & Santa Fe Springs Rd – Parcel 5, Santa Fe Springs, CA 90670)

ENGINEERING / PUBLIC WORKS DEPARTMENT:
(Contact: Alex Flores 562-868-0511 x7507)

STREETS

1. The applicant shall design and construct a cul-de-sac at the easterly side of Hawkins street per SFS City Standard R-8.1. The street structural section is to match the adjacent existing pavement section at Hawkins Street of 2-inch ARHM over 2-inch AC on 13-inch aggregate base.
2. Full street improvements shall be constructed at the cul-de-sac to City Standards in accordance with plans prepared by the applicant and/or developer and approved by the City Engineer. Street improvements shall include curb & gutter per SFS City Standard R-7, sidewalk per SFS City Standard R-2, and commercial driveways per SFS City Standard R-6.4B/C. A soils report shall be prepared and submitted to the City Engineer for the area of the cul-de-sac.
3. Street right-of-way easement to be shown on the parcel map shall be dedicated to the City as follows:
 - a. Full length and width of new Cul-de-sac at the easterly end of Hawkins Street.
4. All oil wells, pipelines, tanks, and related lines within the public right-of-way shall be removed from the right-of-way unless otherwise approved by the City Engineer.
5. That adequate “on-site” parking shall be provided per City requirements, and all streets abutting the development shall be posted with “(CA) R-26” “No Stopping Any Time” signs, spaced 150’ on center, along entire property frontage. The Applicant will cause construction for the installation of the offsite signs per City Standard detail “T-7” or “T-8”.
6. The applicant shall pay for and install, replace or modify any existing street name signs, traffic control signs, striping and pavement markings required in conjunction with the development, or damaged during construction.
7. That the applicant shall pay for the design and inspection, to install, (1) street light and all appurtenances at a location designated by the City Traffic Engineer. Plans must be prepared by a current California Licensed Civil Engineer. Applicant shall then cause construction, per approved Civil Plan, for the installation, of new street light within Hawkins Street.

8. That common driveways shall not be allowed unless approved by the City Engineer. Proposed driveways shall be located to clear existing fire hydrants, street lights, water meters, etc.
9. The applicant and/or developer shall pay for the design, installation, and inspection of underground new overhead utility services into the property along Hawkins Street. All existing overhead utility infrastructure along the property frontage shall remain in place.

CITY UTILITIES

10. Any Storm drains, catch basins, connector pipes, retention basin and appurtenances built for this project shall be constructed in accordance with City specifications in Hawkins Street. Storm drain plans shall be approved by the City Engineer.
11. The applicant shall design and construct a new extension to the 12" water main in Hawkins Street, from existing main termination, to new Property frontage, in accordance with City specifications. All plans must be reviewed by the City Water Utility Manager, for acceptance and approval by the City Engineer.
12. The applicant shall pay for, design and cause construction for all water services from the mainline to the building point of connection. The services shall be designed to current City Water Department standards. The service lines from the mainline to the meter shall be reviewed and approved by the City's Water Department.
13. Fire hydrants shall be installed as required by the Fire Department for onsite and offsite hydrants. Existing public fire hydrants adjacent to the site, if any, shall be upgraded if required by the City Engineer.
14. That sanitary sewers shall be constructed in accordance with current LA County Building Code specifications for all new (Private) Sewer lateral connections to serve the subject development. The plans for the (Private) sanitary sewers shall be approved by the City of Santa Fe Springs Building Department. Approvals will be required for both "onsite" sanitary sewer and "offsite" connections to the mainline. Any proposed connection to a City of Santa Fe Springs sewer mainline will require a sewer study that follows LA County standards, and shall be submitted along with the sanitary sewer plans to the City Building Department.
15. In the case of the development proposing to connect to the sewer main in Hawkins Street, the applicant shall extend the existing (Public) 8" VCP Sewer Main Line to the end of the cul-de-sac. The applicant shall follow all necessary reviews and approvals to construct the sewer main extension. The applicant shall pay for the design and cause construction of the sewer main extension.

16. All buildings shall have separate connections to the sanitary sewers.
17. That the fire sprinkler plans, which show the proposed double-check valve detector assembly location, shall have a stamped approval from the Community Development Department and Public Works Department prior to the Fire Department's review for approval. Disinfection, pressure and bacteriological testing on the line between the street and detector assembly shall be performed in the presence of personnel from the City Water Department. The valve on the water main line shall be operated only by the City and only upon the City's approval of the test results.
18. That the applicant shall pay a Storm Drain Connection Permit fee for any connection to the storm drain system.
19. That the (Private) landscape irrigation system shall be connected to the (Public) reclaimed water main in Hawkins Street. Separate (Private) meter(s) and backflow devices shall be installed to accommodate connection or future connection of irrigation systems to the reclaimed water line. The applicant shall design and construct the extension of the (Public) 8" recycled water main in Hawkins Street in accordance with Central Basin Municipal Water District specifications. All plans must be reviewed and approved by CBMWD and/or the City of Santa Fe Springs Water Department.
20. The applicant shall have an overall site utility master plan prepared by a Registered Civil Engineer, showing proposed service connections to the (Public) water mains, reclaimed water mains, sanitary sewers and storm drains. This plan shall be approved by the City Engineer prior to the preparation of any construction plans for the aforementioned improvements.

TRAFFIC

21. The applicant shall submit a traffic study prepared by a Professional Traffic Engineer. The traffic study will include all scope items that are in the "Local Transportation Assessment Study Scope – EPD Project #: 23-090" dated March 4, 2024, that includes the City Traffic Engineer's comments. Any improvements or mitigation measures to alleviate traffic burdens must be shown in the traffic study. Mitigation measures may include, but are not limited to, installation of traffic signals and/or modifications, the installation of additional left turn lanes or deceleration lanes, the lengthening of left turn lanes or other median modifications, etc. Any required mitigation measures within the traffic study shall become a condition of approval. The applicant/developer shall have improvement plans prepared for the mitigation measures shall be apart of the offsite improvement plans for the project and they shall be reviewed by the City. The applicant will pay associated plan check & inspections fees and will cause construction of said improvements.

22. That a signage and striping plan shall be a part of the offsite improvement plans. The plan shall be reviewed and approved by the City Traffic Engineer.

PARCEL MAPS

23. Final parcel map checking of \$4,970 plus \$295 per parcel shall be paid to the City. Developer shall comply with Los Angeles County's Digital Subdivision Ordinance (DSO) and submit final maps to the City and County in digital format.
24. The applicant shall provide at no cost to the City, one mylar print of the recorded parcel map from the County of Los Angeles Department of Public Works, P.O. Box 1460, Alhambra, CA 91802-1460, Attention: Bill Slenniken (626) 458-5131.

FEES

25. That the applicant shall pay the City "Water Trunk Line" connection fee of \$3,700 per acre upon application for water service connection or if utilizing any existing water service.

MISCELLANEOUS

26. That a grading, and drainage plan shall be submitted for approval to the Building Department. The applicant shall pay all review fees in conjunction with this submittal. A professional civil engineer registered in the State of California shall prepare the grading plan.
27. That a hydrology study shall be submitted to the Building Department for review and approval. The study shall be prepared by a Professional Civil Engineer in the State of California.
28. That upon completion of public improvements constructed by developers, the developer's civil engineer shall submit mylar record drawings and an electronic file (AutoCAD Version 2019 or higher) to the office of the City Engineer.
29. That the applicant shall comply with the National Pollutant Discharge Elimination System (NPDES) program and shall require the general contractor to implement storm water/urban runoff pollution prevention controls and Best Management Practices (BMPs) on all construction sites in accordance with the current MS4 Permit. The applicant will also be required to submit a Certification for the project and will be required to prepare a Storm Water Pollution Prevention Plan (SWPPP).

DEPARTMENT OF FIRE - RESCUE (FIRE PREVENTION DIVISION)

(Contact: Kevin Yang 562.868-0511 x3811)

30. Prior to issuance of Certificate of Occupancy or Building Final, the applicant shall install a fire sprinkler system based on the information provided. Fire sprinkler plans shall be submitted and approved by the Santa Fe Springs Department of Fire-Rescue prior to installation.
31. Prior to issuance of Certificate of Occupancy or Building Final, the applicant shall install a monitored manual/automatic fire alarm system in accordance with California Fire Code Section 907. Plans shall be submitted and approved by the Santa Fe Springs Department of Fire-Rescue prior to installation.
32. Prior to issuance of Building Permit, plans for an emergency responder radio coverage system in accordance with California Fire Code Section 510 shall be submitted to the Santa Fe Springs Department of Fire-Rescue for review and approval.
33. Prior to issuance of Building Permit, a written fire safety plan for construction in accordance with California Fire Code Section 3303.1.1 shall be submitted to the Santa Fe Springs Department of Fire-Rescue for review and approval.
34. Prior to issuance of Building Permit, the applicant shall provide the Santa Fe Springs Department of Fire-Rescue with a site plan for fire lanes and signage.
35. That the standard aisle width for onsite emergency vehicle maneuvering shall be 26 feet with a minimum clear height of 13 feet 6 inches. Internal driveways shall have a turning radius of not less than 52 feet. The final location and design of this 26 feet shall be subject to the approval of the City's Fire Chief as established by the California Fire Code. A request to provide emergency vehicle aisle width less than 26 feet shall be considered upon the installation/provision of mitigation improvements approved by the City's Fire Chief.
36. That interior gates or fences are not permitted across required access roadways unless otherwise granted prior approval by the Santa Fe Springs Department of Fire-Rescue.
37. Prior to construction, all traffic calming designs/devices must be approved by the Santa Fe Springs Department of Fire-Rescue.
38. Prior to issuance of Building Permit, the applicant shall furnish one copy of the water system plans to the Santa Fe Springs Department of Fire-Rescue for review.
39. The required water system, including fire hydrants, shall be installed, made serviceable, and be accepted by the Santa Fe Springs Department of Fire-Rescue prior to beginning construction. They shall be maintained accessible.
40. Existing fire hydrants on public streets are allowed to be considered available. Existing fire hydrants on adjacent properties shall not be considered available.

unless fire lanes extend between properties and easements are established to prevent obstruction of such lanes.

41. That when on-site fire hydrants are required by the Santa Fe Springs Department of Fire-Rescue, a minimum flow must be in accordance with Appendix B from the current Fire Code flowing from the most remote hydrant. In addition, on-site hydrants must have current testing, inspection and maintenance per California Title 19 and NFPA 25. Lastly, on-site fire hydrants shall be painted red.
42. Prior to issuance of Certificate of Occupancy or Building Final, "Blue Reflective Markers" shall be installed to identify fire hydrant locations.
43. Prior to issuance of a Certificate of Occupancy or Building Final, a "Knox Box Rapid Entry System" shall be provided. The Knox Box shall be installed in an accessible location approved by the Fire Code Official. Electric powered gates shall be provided with Knox key switches for access by emergency personnel. Where manual operated gates are permitted, they shall be provided with a Knox box or Knox padlock.
44. That the applicant shall comply with the requirements of Section 117.131 of the Santa Fe Springs Municipal Code, Requirement for a Soil Gas Study or Methane Mitigation System, prior to issuance of building permits.
45. When applicable, abandoned oil wells must be exposed and inspected under the oversight of a registered engineer, registered geologist or other Fire-Rescue approved technical expert. The wells must be monitored for methane leaks and the precise location of each abandoned well shall be surveyed. A report of findings, along with a description of any recommended remedial actions (if necessary), signed by a registered engineer, registered geologist or Fire-Rescue approved technical expert, must be provided to the Santa Fe Springs Department of Fire-Rescue.
46. That a methane gas protection system designed in accordance with the standards established by the County of Los Angeles shall be required for all habitable structures. Plans for the proposed methane gas protection system shall be submitted to the Santa Fe Springs Department of Fire-Rescue prior to construction. An alternative to the County of Los Angeles standards may be acceptable if approved by the Santa Fe Springs Department of Fire-Rescue.
47. That all inactive oil wells located beneath or within 10 feet of the proposed building footprint are abandoned to current California Geological Energy Management Division (CALGEM) standards or are approved by the City pursuant Section 117.130 of the Santa Fe Springs Code of Ordinances.
48. That all abandoned oil wells located beneath or within 10 feet of the proposed building footprint shall be equipped with a concrete vent cone or other measures

approved by the City. The installation of the vent cone and associated vent piping, or other measures approved by the City, shall be approved by the Santa Fe Springs Department of Fire-Rescue prior to installation.

DEPARTMENT OF FIRE - RESCUE (ENVIRONMENTAL DIVISION)
(Contact: Eric Scott 562.868-0511 x3812)

49. That prior to issuance of building permits, the applicant shall comply with the applicable conditions below and **obtain notification in writing** from the Santa Fe Springs Department of Fire-Rescue Environmental Protection Division (EPD) that all applicable conditions have been met:
- a. At a minimum, the applicant must conduct an All Appropriate Inquiries (AAI) Investigation (formerly called a Phase I Environmental Site Assessment) in accordance with ASTM Standard E1527-05. The applicant shall provide the EPD with a copy of the AAI investigation report for review and approval. If the AAI investigation identifies a release, or potential release at the site, the applicant must comply with part b.
 - b. An environmental site assessment may be required based on the information presented in the AAI investigation report. The environmental site assessment report must be reviewed and approved by the EPD in writing. Should the report indicate that contaminate levels exceed recognized regulatory screening levels, remedial action will be required. A remedial action work plan must be approved by the authorized oversight agency before implementation. Once remedial action is complete, a final remedial action report must be submitted and approved by the oversight agency.
 - c. Soil Management Plan & Report. A Soils Management Plan (SMP) which addresses site monitoring and a contingency plan for addressing previously unidentified contamination discovered during site development activities may be required. If required, the SMP shall be submitted to the EPD for review and approval before grading activities begin. Once grading is complete, a SMP report must be submitted to the EPD for final written approval. Building plans will not be approved until the SMP report has been approved by the EPD in writing.
50. Permits and approvals. That the applicant shall, at its own expense, secure or cause to be secured any and all permits or other approvals which may be required by the City and any other governmental agency prior to conducting environmental assessment or remediation on the property. Permits shall be secured prior to beginning work related to the permitted activity.
51. That all abandoned pipelines, tanks and related facilities shall be removed unless approved by the City Engineer and Fire Chief. Appropriate permits for such work shall be secured before abandonment work begins.

52. That the applicant shall comply with all Federal, State and local requirements and regulations included, but not limited to, the Santa Fe Springs City Municipal Code, California Fire Code, Certified Unified Program Agency (CUPA) programs, the Air Quality Management District's Rules and Regulations and all other applicable codes and regulations.

POLICE SERVICES DEPARTMENT:

(Contact: Kristen Haining 562.409.1850 x3302)

53. The applicant shall submit and obtain approval of a proposed lighting (photometric) plan for the property from the City's Department of Police Services. The photometric plan shall be designed to provide adequate lighting (minimum of 1 foot candle power) throughout the subject property. Further, all exterior lighting shall be designed/installed in such a manner that light and glare are not transmitted onto adjoining properties in such concentration/quantity as to create a hardship to adjoining property owners or a public nuisance. The photometric plans shall be submitted to the designated contact person from the Department of Police Services in conjunction with the submittal of the Parking Electrical Plans. PDF formatted plans are acceptable and shall be emailed to luiscollazo@santafesprings.org.
54. In order to facilitate the removal of unauthorized vehicles parked on the property (after construction of the building is completed), the applicant shall post, in plain view and at each entry to the property, a sign not less than 17" wide by 22" long. The sign shall prohibit the public parking of unauthorized vehicles, wording to indicate that unauthorized vehicles will be removed at the owner's expense, and contain the California Vehicle Section Code 22658 that permits this action. The sign shall also contain the telephone number of the local law enforcement agency (Whittier Police (562) 567-9240). The lettering within the sign shall not be less than one inch in height. The applicant shall contact the Police Services Center for an inspection no later than 30 days after the project has been completed and prior to the occupancy permit being issued.
55. All tenants occupying the proposed industrial buildings are to be notified that all respective work shall be conducted inside at all times including, but not limited to, all loading and unloading of trucks and trailers. Items and/or merchandise shall not be left outside of the building while awaiting loading. Outdoor storage and/or activities are strictly prohibited at all times.
56. Vehicles are not to block traffic at any time. It is the responsibility of the on-site manager to prevent or discourage this activity; drivers are subject to citations.
57. The proposed buildings, including any lighting, fences, walls, cabinets, and poles shall be maintained in good repair, free from trash, debris, litter and graffiti and other forms of vandalism. Graffiti shall be removed or painted over with a matching paint color within 72-hours of occurrence. Any damage from any such cause shall

be repaired within 5-days of occurrence, weather permitting, to minimize dangerous conditions and/or visual blight.

58. The property owner and/or lease agent shall notify any potential tenants and/or customers that they are mandated to comply with the ambient noise requirements as required by Santa Fe Springs Zoning Code Section 155.424 (a copy is available upon request).
59. The property owner and/or lease agent shall notify any potential tenants that the parking areas and their respective aisles and/or Fire Lanes shall not be reduced or encroached upon with outdoor storage. Moreover, pursuant to Section 95.03(12) outdoor storage is prohibited at all times.
60. All parking stalls and/or designated parking areas shall be continuously available to all employees and customers during their business hours. Parking Stalls shall not be sectioned off for reserved or preferred parking.
61. A permanent building address number shall be placed on the building side facing Hawkins Street. The building address number may be incorporated within any proposed business identification monument sign. Regardless of the location, the address number shall be plainly visible at all times.
62. Trucks and/or trailers owned by the building occupants and/or his contracted drivers shall not park or queue on the street at anytime. The business occupant and/or his acting site manager shall be responsible to make sure this conditions is complied with at all times.
63. The Applicant and/or his tenant be aware that SFSMC §72.16 prohibits the parking of semi-trailers or trailers on any street or alley unless such vehicle is, at all times while parked, attached to a truck or vehicle capable of moving such semi-trailer or trailer upon public streets and highways.
64. The on-site paving shall be maintained free of pot-holes or other similar damage and the Applicant shall make repairs within 72-hours of identifying any pavement deficiencies.
65. Parking markings (parking striping, directional arrows, etc.) shall be maintained at all times and re-painted when they become faded.
66. The applicant shall provide an emergency phone number and a contact person of the person or persons involved in the supervision of the construction to the Department of Police Service. During the construction phase of the proposed project, the contractor shall provide an identification number (i.e. address number) at each building and/or entry gate to direct emergency responders in case of an emergency. DO NOT PAINT NUMBERS ON THE BUILDING.

67. The name, telephone number, fax number and e-mail address of the person(s) involved in the supervision of the construction shall be provided to the Department of Police Services (Attn: Lou Collazo) no later than 60 days from the date of the approval by the Planning Commission. Information will be submitted to the emergency dispatch operators serving the City's Police and Fire agencies.
68. It shall be the responsibility of the job-supervisor to maintain the job site in a clean and orderly manner. Dirt, dust, and debris that has migrated to the street or neighboring properties shall be immediately cleaned. Porta-potties, or equal, shall not be visible from the public street and maintained on a regular basis. All construction debris shall be placed in trash/recycle bins at the end of every work day and shall not be left out visible from public view.
69. Graffiti on any of the temporary construction fencing, screening, equipment, vehicles, and other related items on the construction site shall be fully removed or covered with new matching paint within 72-hours.

WASTE MANAGEMENT:

(Contact: Joe Barrios 562.409-7569)

70. The applicant shall comply with Section 50.51 of the Municipal Code which prohibits any business or residents from contracting any solid waste disposal company that does not hold a current permit from the City.
71. All projects are subject to the requirements of Chapter 50 to reuse or recycle 75% of the project waste. For more information, please contact the City's Environmental Consultant, MuniEnvironmental at (562) 432-3700.
72. The applicant shall comply with Public Resource Code, Section 42900 et seq. (California Solid Waste Reuse and Recycling Access Act of 1991) as amended, which requires each development project to provide adequate storage area for the collection/storage and removal of recyclable and green waste materials.

COMMUNITY DEVELOPMENT DEPARTMENT:

(Contact: Jimmy Wong 562.868-0511 x7451)

73. To prevent the travel of combustible methane gas into any structure, all slab or foundation penetrations, including plumbing, communication and electrical penetrations, must be sealed with an appropriate material. In addition, underground electrical conduits penetrating the slab or foundation of the structure, shall comply with the National Electrical Code (NEC), replete with a seal-off device normally required for classified electrical installations, so as to prevent the travel of combustible methane gas into the structure through conduit runs. Refer to California Electrical Code, Chapter 5, Sections 500 and 501.

74. If the subject property is deemed to be located within the "Methane Zone" by the City of Santa Fe Springs Community Development Department, the owner/developer shall indicate the subject property is located within the Methane Zone on the first page of the building construction plans as well as the MEPs that are submitted to the County. Said indication shall be clearly painted with a minimum front size of 20 point.
75. The Mitigation Monitoring and Reporting Program, which was prepared for the proposed project and adopted by the Planning Commission shall be made part of the conditions of approval for the subject development. The Mitigation Monitoring and Reporting Program is listed as an attachment to this staff report.
76. The applicant shall be responsible for implementing mitigation measures pursuant to the Mitigation Monitoring and Reporting Program and provide all necessary documentation. Community Development Department staff will verify compliance prior to the issuance of the Certificate of Occupancy. *Mitigations that require on-going monitoring shall be reported to the City every six (6) months.*
77. The Community Development Department requires that the double-check detector assembly be placed as far back as practical, screened by shrubs or other materials, and painted forest green. All shrubs shall be planted a minimum distance of two (2) feet surrounding the detector assembly; however, the area in front of the OS and Y valves shall not be screened. The screening shall also only be applicable to the double-check detector assembly and shall not include the fire department connector (FDC). Notwithstanding, the Fire Marshall shall have discretionary authority to require the FDC to be located a minimum distance from the double-check detector assembly. There shall also be a maximum distance of two (2) feet between the lowest part of the ground and the bottom of the valve shut off wheel.
78. That all Reduced Pressure Backflow preventer shall be installed in a backflow prevention cage on a concrete pad. The backflow preventer shall be painted "hunter green." Please see All-Spec Enclosure Inc., stainless steel tubular backflow preventer. The enclosure shall be lockable, weather resistant and vandal proof. The location shall be near the water meter in the landscape area. Note: See Public Works Backflow Prevention Enclosure standard W-20.
79. Applicant shall comply with the City's "Heritage Artwork in Public Places Program" in conformance with City Ordinance No. 1054.
80. Applicant understands and agrees that all exterior mechanical equipment shall be screened from view on all sides. Additionally, all roof-mounted mechanical equipment and/or duct work which projects above the roof or roof parapet of the proposed development and is visible from adjacent property or a public street shall be screened by an enclosure which is consistent with the architecture of the building in terms of materials and color and also approved by the Director of

Community Development Department or designee. If full screening of roof mounted equipment is not designed specifically into the building, the applicant shall submit mechanical plans that includes a roof plan showing the location of all roof mounted equipment and any proposed screening prior to submitting plans to the Building Division for plan check.

- a. To illustrate the visibility of equipment and/or duct work, the following shall be submitted along with the Mechanical Plans:
 - i. A roof plan showing the location of all roof-mounted equipment;
 - ii. Elevations of all existing and proposed mechanical equipment; and
 - iii. A building cross-section drawing which shows the roof-mounted equipment and its relation to the roof and parapet lines.
81. It shall be unlawful for any person to operate equipment or perform any outside construction or repair work on buildings, structures, or projects, other than emergency work, between 7:00 p.m. on one day and 7:00 a.m. of the following day, if such maintenance activity produces noise above the ambient levels as identified in the City's Zoning Regulations.
82. The landscaped areas shall be provided with a suitable, fixed, permanent and automatically controlled method for watering and sprinkling of plants. This operating sprinkler system shall consist of an electrical time clock, control valves, and piped water lines terminating in an appropriate number of sprinklers to insure proper watering periods and to provide water for all plants within the landscaped area. Sprinklers used to satisfy the requirements of this section shall be spaced to assure complete coverage of all landscaped areas. *Said plan shall be consistent with AB 1881 (Model Water Efficient Landscape Ordinance).*
83. Upon completion of the new landscaping and landscape upgrade, the required landscaped areas shall be maintained in a neat, clean, orderly and healthful condition. This is meant to include proper pruning, mowing of lawns, weeding, removal of litter, fertilizing, and replacement of plants when necessary and the regular watering of all plantings.
84. The damaged asphalt and swale (ribbon gutter) shall be repaired and the parking lot area shall be slurry-sealed and re-striped within ninety (90) days from the date of issuance of a Certificate of Occupancy by the Building Inspector for the proposed building addition.
85. The electrical plans, which show the location of electrical transformer(s), shall be subject to the approval of the Community Development Department. Transformers shall not be located within the front yard setback area. The location of the transformer(s) shall be subject to the prior approval of the Director of Community Development Department or designee. The electrical transformer shall be screened with shrubs consistent with Southern California Edison's Guidelines

which requires three (3) foot clearance on sides and back of the equipment, and eight (8) foot clearance in front of the equipment. Additionally, the landscaping irrigation system shall be installed so that they do not spray on equipment. A copy of the SCE Guidelines are available at the Community Development Department.

86. All activities shall occur inside the building(s). No portion of the required off-street parking and driveway areas shall be used for outdoor storage of any type or for special-event activities, unless prior written approval is obtained from the Director of Community Development Department, Director of Police Services and the Fire Marshall.
87. All vehicles associated with the businesses on the subject property shall be parked on the subject site at all times. Off-site parking is not permitted and would result in the restriction or revocation of privileges granted under this Permit. In addition, any vehicles associated with the property shall not obstruct or impede any traffic.
88. All fences, walls, gates and similar improvements for the proposed development shall be subject to the prior approval of the Department of Fire-Rescue and the Department of Community Development.
89. The Department of Community Development shall first review and approve all sign proposals for the development. The sign proposal (plan) shall include a site plan, building elevation on which the sign will be located, size, style and color of the proposed sign. All drawings shall be properly dimensioned and drawn to scale on 11" x 17" maximum-size paper. All signs shall be installed in accordance with the sign standards of the Zoning Ordinance and the Sign Guidelines of the City.
90. Sufficient number of approved outdoor trash enclosures shall be provided for the development subject to the approval of the Director of Community Development Department or designee. The calculation to determine the required storage area is: 1% of the first 20,000 sq ft of floor area + ½% of floor area exceeding 20,000 sq ft, but not less than 4 ½ feet in width nor than 6 feet in height. (*Calculations are subject to change*). Further, all trash enclosures shall be designed to architecturally integrate with the overall design theme of the development. Trash enclosures should be provided with a trellis (or other covered structure) and also provided with vines (if located adjacent to or within a landscaped area) to help minimize the visual impact of said enclosures. Additionally, said enclosure shall be consistent with the County of Los Angeles Building Code requirements, and specifically Title A, Division 7, Section 7313.
91. The proposed building shall be constructed of quality material and any material shall be replaced when and if the material becomes deteriorated, warped, discolored or rusted.

92. Approved suite numbers/letters or address numbers shall be placed on the proposed building in such a position as to be plainly visible and legible from the street fronting the property. Said numbers shall contrast with their background. The size recommendation shall be 12" minimum.
93. Prior to issuance of building permits, the applicant shall comply with the following conditions to the satisfaction of the City of Santa Fe Springs:
 - a. Covenants.
 1. Applicant shall provide a written covenant to the Community Development Department that, except as owner/developer may have otherwise disclosed to the City, Commission, Planning Commission or their employees, in writing, owner/developer has investigated the environmental condition of the property and does not know, or have reasonable cause to believe, that (a) any crude oil, hazardous substances or hazardous wastes, as defined in state and federal law, have been released, as that term is defined in 42 U.S.C. Section 9601 (22), on, under or about the Property, or that (b) any material has been discharged on, under or about the Property that could affect the quality of ground or surface water on the Property within the meaning of the California Porter-Cologne Water Quality Act, as amended, Water Code Section 13000, et seq
 2. Applicant shall provide a written covenant to the City that, based on reasonable investigation and inquiry, to the best of applicant's knowledge, it does not know or have reasonable cause to believe that it is in violation of any notification, remediation or other requirements of any federal, state or local agency having jurisdiction concerning the environmental conditions of the Property.
 - b. Applicant understands and agrees that it is the responsibility of the applicant to investigate and remedy, pursuant to applicable federal, state and local law, any and all contamination on or under any land or structure affected by this approval and issuance of related building permits. The City, Commission, Planning Commission or their employees, by this approval and by issuing related building permits, in no way warrants that said land or structures are free from contamination or health hazards.

- c. Applicant understands and agrees that any representations, actions or approvals by the City, Commission, Planning Commission or their employees do not indicate any representation that regulatory permits, approvals or requirements of any other federal, state or local agency have been obtained or satisfied by the applicant and, therefore, the City, Commission, Planning Commission or their employees do not release or waive any obligations the applicant may have to obtain all necessary regulatory permits and comply with all other federal, state or other local agency regulatory requirements. Applicant, not the City, Commission, Planning Commission or their employees will be responsible for any and all penalties, liabilities, response costs and expenses arising from any failure of the applicant to comply with such regulatory requirements.
- 94. Prior to occupancy of the property/building, the applicant, and/or his tenant(s), shall obtain a valid business license (AKA Business Operation Tax Certificate), and submit a Statement of Intended Use. Both forms, and other required accompanying forms, may be obtained on the City's website (<https://santafesprings.hdlgov.com>).
- 95. Applicant shall be responsible for reviewing and/or providing copies of the required conditions of approval to his/her architect, engineer, contractor, tenants, etc. Additionally, the conditions of approval contained herein, shall be made part of the construction drawings for the proposed development. *Construction drawings shall not be accepted for Plan Check without the conditions of approval incorporated into the construction drawings.*
- 96. Applicant shall require and verify that all contractors and sub-contractors have successfully obtained a Business License with the City of Santa Fe Springs prior to beginning any work associated with the subject project. A late fee and penalty will be assessed to any contractor or sub-contractor that fails to obtain a Business License and a Building Permit final or Certificate of Occupancy will not be issued until all fees and penalties are paid in full. Please contact the Finance Department at (562) 868-0511, extension 7520 for additional information. A business license application can also be downloaded at <https://santafesprings.hdlgov.com>.
- 97. The development shall otherwise be substantially in accordance with the plot plan, floor plan, and elevations submitted by the owner and on file with the case.
- 98. The final plot plan, floor plan and elevations of the proposed development and all other appurtenant improvements, textures and color schemes shall be subject to the final approval of the Director of Community Development Department.
- 99. All other requirements of the City's Zoning Ordinance, Building Code, Property Maintenance Ordinance, State and City Fire Code and all other applicable County, State and Federal regulations and codes shall be complied with.

100. The applicant shall indemnify, protect, defend, and hold harmless, the City, and/or any of its officials, officers, employees, agents, departments, agencies, and instrumentalities thereof, from any and all claims, demands, law suits, writs of mandamus, and other actions and proceedings (whether legal, equitable, declaratory, administrative or adjudicatory in nature), and alternative dispute resolutions procedures (including, but not limited to arbitrations, mediations, and other such procedures), (collectively "Actions"), brought against the City, and/or any of its officials, officers, employees, agents, departments, agencies, and instrumentalities thereof, that challenge, attack, or seek to modify, set aside, void, or annul, the any action of, or any permit or approval issued by, the City and/or any of its officials, officers, employees, agents, departments, agencies, and instrumentalities thereof (including actions approved by the voters of the City), for or concerning the project, whether such Actions are brought under the California Environmental Quality Act, the Planning and Zoning Law, the Subdivisions Map Act, Code of Civil Procedure Section 1085 or 1094.5, or any other state, federal, or local statute, law, ordinance, rule, regulation, or any decision of a court of competent jurisdiction. In addition, the applicant shall reimburse the City, its officials, officers, employees, agents, departments, agencies, for any Court costs and attorney's fees which the City, its agents, officers, or employees may be required by a court to pay as a result of such action. It is expressly agreed that the City shall have the right to approve, which approval will not be unreasonably withheld, the legal counsel providing the City's defense, and that applicant shall reimburse City for any costs and expenses directly and necessarily incurred by the City in the course of the defense. City shall promptly notify the applicant of any such claim, action or proceeding, and shall cooperate fully in the defense thereof.
101. That the applicant understands and agrees that this approval is subject to modification or revocation as set forth in the Santa Fe Springs Municipal Code. Grounds for modification or revocation include, but are not limited to, Applicant's failure to comply with any condition of approval contained herein.
102. That the applicant understands and agrees that if any term or condition of this approval is determined in whole or in part to be invalid or unenforceable, such determination shall not affect the validity or enforceability of any other term or condition contained herein.
103. Applicant understands if changes to the original plans (submitted and on file with the subject case) are required during construction, revised plans must be provided to the Community Development Department for review and approval prior to the implementation of such changes. Please note that certain changes may also require approvals from other departments.
104. The applicant shall be responsible for ensuring that information contained in construction drawings and/or landscape & irrigation plans are consistent among architectural, structural, electrical, mechanical, plumbing, fire, utility and public

improvement plans as well as other civil drawings. This responsibility may be transferred by the applicant to the project architect. While the City aims to correct inconsistencies, it is the ultimate responsibility of the applicant/project architect to remedy, up to and including completion of construction revisions prior to receiving final occupancy approvals.

105. Applicant shall clarify on the construction drawings that all roof drains (facing the street), shall be provided along the interior walls and not along the exterior of the building.
106. All lighting, fences, walls, and poles shall be maintained by the applicant in good repair, free from trash, debris, litter and graffiti and other forms of vandalism. Any damage from any cause shall be repaired within 24 hours of occurrence, weather permitting, to minimize occurrences of dangerous conditions or visual blight. Paint utilized in covering graffiti shall be a color that matches, as closely possible, the color of the adjacent surfaces.
107. No portion of the required off-street parking and driveway areas shall be used for outdoor storage of any type or for special-event activities, unless prior written approval is obtained from the Director of Community Development, Director of Police Services, and Fire Marshall.
108. Prior to or otherwise concurrent with the issuance of Building Permits, the applicant shall obtain an Office Trailer Permit for the use of mobile office trailers during the construction process.

NORTHWEST CORNER OF TELEGRAPH AND SANTA FE SPRINGS

SCH NO. 2024050495

Final ENVIRONMENTAL IMPACT REPORT

Prepared for
City of Santa Fe Springs
11710 Telegraph Road
Santa Fe Springs, CA 90607

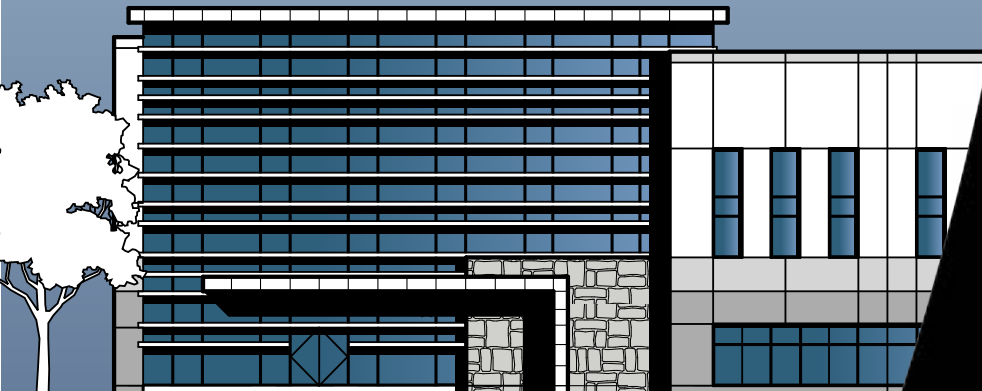
February 2025

Prepared by

E | P | D
SOLUTIONS, INC

949.794.1180
3333 Michelson Drive, Suite 500
Irvine, CA 92612

EPDSolutions.com



This page intentionally left blank.

Table of Contents

1. Introduction.....	1-1
2. Response to Comments.....	2-1
3. Revisions to the Draft EIR.....	3-1
4. Mitigation Monitoring and Reporting Program.....	4-1

Tables

TABLE 2-1: COMMENTS RECEIVED ON THE DRAFT EIR	2-1
TABLE 4-1: MITIGATION MONITORING AND REPORTING PROGRAM.....	4-3

This page intentionally left blank.

1. Introduction

This Final Environmental Impact Report (Final EIR) has been prepared in conformance with the environmental policy guidelines for the implementation of the California Environmental Quality Act (CEQA) to evaluate the environmental effects that may result from construction and operation of the proposed Northwest Corner of Telegraph and Santa Fe Springs Project (proposed Project).

According to CEQA Guidelines Section 15132, the Final EIR shall consist of:

- (a) The Draft Environmental Impact Report (Draft EIR) or a revision of the Draft EIR;
- (b) Comments and recommendations received on the Draft EIR, either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR;
- (d) The responses of the lead agency to significant environmental points raised in the review and consultation process;
- (e) Any other information added by the lead agency.

This document contains responses to comments received on the Draft EIR during the public review period, which began on November 27, 2024, and ended on January 13, 2025. A Notice of Availability of the Draft EIR was published concurrently with distribution of the Draft EIR. This document has been prepared in accordance with CEQA, the CEQA Guidelines, and represents the independent judgment of the lead agency, which is the City of Santa Fe Springs. This document and the circulated Draft EIR comprise the Final EIR in accordance with CEQA Guidelines, Section 15132.

1.1 FORMAT OF THE FINAL EIR

The following chapters are contained within this document:

Section 1.0, Introduction. This section describes CEQA requirements and the content of the Final EIR.

Section 2.0, Response to Comments. This section provides a list of agencies and organizations who commented on the Draft EIR, as well as copies of their comment letters received during and following the public review period, and individual responses to their comments.

Section 3.0, Revisions to the Draft EIR. This section contains revisions made to the Draft EIR as a result of the comments received by agencies and organizations as described in Section 2.0, and/or errors and omissions discovered since release of the Draft EIR for public review.

The City of Santa Fe Springs has determined that none of this material constitutes significant new information that requires recirculation of the Draft EIR for further public comment under CEQA Guidelines Section 15088.5. The additional material clarifies existing information in the Draft EIR and does not present any new substantive information. None of this new material indicates that the Project would result in a significant new environmental impact not previously disclosed in the Draft EIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that would not be mitigated, or that any of the other circumstances requiring recirculation described in Section 15088.5 would occur.

Section 4.0, Mitigation, Monitoring, and Reporting Program. This chapter includes the Mitigation Monitoring and Reporting Program (MMRP). CEQA requires lead agencies to “adopt a reporting and mitigation monitoring program for the changes to the project which it has adopted or made a condition of

project approval in order to mitigate or avoid significant effects on the environment” (Public Resources Code (PRC) Section 21081.6, CEQA Guidelines Section 15097). The MMRP was prepared based on the mitigation measures included in the Draft EIR and finalized in this Final EIR.

1.2 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review and comment of Draft EIRs should be *“on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible ... CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”*

CEQA Guidelines Section 15204(c) further advises, *“Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.”* Section 15204 (d) also states, *“Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.”* Section 15204 (e) states, *“This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”*

In accordance with PRC Section 21092.5, copies of the written responses to public agencies are being forwarded to those agencies at least 10 days prior to certification of the Final EIR, with copies of this Final EIR document, which conforms to the legal standards established for response to comments on the Draft EIR pursuant to CEQA.

2. Response to Comments

This section of the Final Environmental Impact Report (FEIR; Final EIR) for the NWC Telegraph SFS (Project) includes a copy of all comment letters that were submitted during the public review period for the Draft Environmental Impact Report (DEIR), along with responses to comments in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088. The 45-day review period for the DEIR began on November 27, 2024, and ended on January 13, 2025. A total of four comment letters were received in response to the DEIR during the 45-day public review period, and no comment letters were received after the close of the public review period.

The responses amplify or clarify information provided in the DEIR and/or refer the reader to the appropriate place in the document where the requested information can be found. Comments that are not directly related to environmental issues (e.g., opinions on the merits of the Project unrelated to its environmental impacts) are noted for the record. Where text changes in the DEIR are warranted based on comments received, updated Project information, or other information provided by City staff, those changes are noted in the response to comment and the reader is directed to Section 3.0, *Revisions to the Draft EIR*, of this FEIR.

These changes to the analysis contained in the DEIR represent only minor clarifications/amplifications and do not constitute significant new information. In accordance with CEQA Guidelines Section 15088.5, recirculation of the DEIR is not required.

All written comments received on the DEIR are listed in Table 2-1. All comment letters received on the DEIR have been coded with a number to facilitate identification and tracking. The comment letters were reviewed and divided into individual comments, with each comment containing a single theme, issue, or concern. Individual comments and the responses to them were assigned corresponding numbers. To aid readers and commenters, electronically bracketed comment letters have been reproduced in this document with the corresponding responses provided immediately following each comment letter.

Table 2-1: Comments Received on the DEIR

Letter Number	Agency/Organization/Name	Comment Date Received
Agencies		
A1	Los Angeles County Sanitation Districts (LACSD)	December 30, 2024
A2	South Coast Air Quality Management District (SCAQMD)	January 10, 2025
A3	California Department of Transportation (CalTrans)	January 13, 2025
Organizations		
O1	Advocates for the Environment	January 8, 2025

To finalize the EIR for the Project, the following responses were prepared to address these comments.

Comment Letter A1: Los Angeles County Sanitation District, December 30, 2024 (3 pages)

**LOS ANGELES COUNTY
SANITATION DISTRICTS**
Converting Waste Into Resources

Robert C. Ferrante

Chief Engineer and General Manager

1955 Workmen Mill Road, Whittier, CA 90601-1400

Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998

(562) 699-7411 • www.lacsd.org

December 30, 2024

Ref. DOC 7377389

VIA EMAIL jimmywong@santafesprings.org

Mr. Jimmy Wong, Associate Planner
Santa Fe Springs Community Development Department
11710 East Telegraph Road
Santa Fe Springs, CA 90670

Dear Mr. Wong:

Second Response to Northwest Corner of Telegraph and Santa Fe Springs

The Los Angeles County Sanitation Districts (Districts) received a Notice of Availability (NOA) of a Draft Environmental Impact Report (DEIR) for the subject project located in the City of Santa Fe Springs on December 2, 2024. Previous comments submitted by the Districts in correspondence dated June 6, 2024 (copy enclosed) still apply to the subject project with the following updated information:

A1.1

1. Section 4.4.11 Utilities and Service Systems, stated that the wastewater generated within the City of Santa Fe Springs will be treated by the Los Coyotes Water Reclamation Plant and the Long Beach Water Reclamation Plant. Please note that the Los Coyotes Water Reclamation Plant and the A.K. Warren Water Resource Facility (formerly known as the Joint Water Pollution Control Plant) in the City of Carson will treat the wastewater generated within the City of Santa Fe Springs. Also, as indicated in the June 6, 2024 response letter, the wastewater generated by the proposed project will be treated at the Los Coyotes Water Reclamation Plant.

A1.2

2. All other information concerning Districts' facilities and sewerage service contained in the document is current.

A1.3

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2742, or phorsley@lacsd.org.

A1.4

Very truly yours,

Patricia Horsley

Patricia Horsley

Environmental Planner

Facilities Planning Department

PLH:pjh

Enclosure

DOC 7392788.D18



**LOS ANGELES COUNTY
SANITATION DISTRICTS**
Converting Waste Into Resources

Robert C. Ferrante
Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

June 6, 2024

Ref. DOC 7227213

VIA EMAIL jimmywong@santafesprings.org

Mr. Jimmy Wong, Associate Planner
City of Santa Fe Springs Planning Department
11710 East Telegraph Road
Santa Fe Springs, CA 90670

Dear Mr. Wong:

NOP Response to NWC Telegraph and Santa Fe Springs

The Los Angeles County Sanitation Districts (Districts) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the subject project located in the City of Santa Fe Springs on May 16, 2024. The proposed project is located within the jurisdictional boundaries of District No. 18. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Florence Avenue Trunk Sewer, located in Florence Avenue at Norwalk Boulevard. The Districts' 15-inch diameter trunk sewer has a capacity of 3.4 million gallons per day (mgd) and conveyed a peak flow of 0.6 mgd when last measured in 2019.
2. The expected average wastewater flow from the project, described in the Initial Study as two warehouse buildings with a combined total building area of 584,678 square feet, inclusive of 10,000 square feet of office space, is 16,367 gallons per day. For a copy of the District's average wastewater generation factors, go to www.lacsd.org, under Services, then Wastewater Program and Permits and select Will Serve Program, and click on the [Table 1, Loadings for Each Class of Land Use](#) link.
3. The wastewater generated by the proposed project will be treated at the Los Coyotes Water Reclamation Plant located in the City of Cerritos, which has a capacity of 37.5 mgd and currently processes an average recycled flow of 18.8 mgd.
4. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital facilities. Payment of a connection fee may be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family Home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, please contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

DOC 7241280.D18

Mr. Jimmy Wong

2

June 6, 2024

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service but is to advise the City that the Districts intend to provide this service up to the levels that are legally permitted and to inform the City of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2742, or phorsley@laesd.org.

Very truly yours,

Patricia Horsley

Patricia Horsley
Environmental Planner
Facilities Planning Department

PLH:plh

cc: A. Schmidt
A. Howard

DOC 7241280.D18

2.1 RESPONSE TO LETTER A1: LOS ANGELES COUNTY SANITATION DISTRICTS, DATED DECEMBER 30, 2024

Comment A1.1: This comment states that the Los Angeles County Sanitation Districts (LACSD) received a notice on December 2, 2024 that the Draft EIR prepared for the project was available. The comment further states that prior comments submitted during the Notice of Preparation would still apply with provided updates.

Response A1.1: This comment does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the DEIR, no further response is required or provided.

Comment A1.2: This comment summarizes that the DEIR identified that wastewater in the City is treated by the Los Coyotes Water Reclamation Plant and the Long Beach Water Reclamation Plant. The comment then states that the Los Coyotes Water Reclamation Plant and the A.K. Warren Water Resource Facility (formerly known as the Joint Water Pollution Control Plant) in the City of Carson treat the wastewater generated within the City of Santa Fe Springs, and more specifically that the Project's wastewater would be treated at the Los Coyotes Water Reclamation Plant.

Response A1.2: The DEIR assumed that wastewater generated within the City would be treated by the Los Coyotes Water Reclamation Plant (LCWRP) and the Long Beach Water Reclamation Plant (LBWRP) based on information from the existing UWMP. Further, the DEIR determined that the Project would solely be treated by the LCWRP. Given that LACSD has provided more current information regarding the City's overall wastewater treatment, DEIR Sections 4.0, *Environmental Setting* and 5.11, *Utilities and Service Systems*, have been revised to reflect current information in Chapter 3.0, *Revisions to the Draft EIR*, of this Final EIR and as shown below. This correction does not change the conclusions of the EIR, and the findings remain the same.

Page 5.11-9, Section 5.11.3.2, *Wastewater Services Environmental Setting*, is revised as follows:

5.11.3.2 Wastewater Services Environmental Setting

The wastewater generated within the City is collected by the City's local sewer system and the Los Angeles County Sanitation District (LACSD's) trunk sewer system, and treated by the Los Coyotes Water Reclamation Plant (LCWRP) and the ~~Long Beach Water Reclamation Plant (LBWRP)~~ **A.K. Warren Water Resource Facility (AKWWRF) (formerly known as the Joint Water Pollution Control Plant) (LACSD, 2025)** ~~(City of Santa Fe Springs, UWMP, 2021)~~. Currently, LCWRP has a design capacity of 37.5 million gallons/day (MGD) and an average flow of 21.7 MGD. ~~LBWRP~~ **AKWWRF** currently has a design capacity of ~~25~~ **400** MGD and an average flow of ~~12.6~~ **260** MGD. The two reclamation plants have a combined design capacity of ~~62.5~~ **437.5** MGD which is equivalent to approximately ~~70,055~~ **490,387** AFY **(LACSD, 2025)** ~~(UWMP, 2020)~~. The Project site would fall within the LCWRP's service area.

Comment A1.3: This comment states that all other information contained in the Draft EIR related to LACSD Facilities and sewer services is current.

Response A1.3: This comment does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the DEIR, no further response is required or provided.

Comment A1.4: This comment concludes the comment letter and provides a contact at the LACSD for further questions.

Response A1.4: This comment does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the DEIR, no further response is required or provided.

Comment Letter A2: South Coast Air Quality Management District, January 10, 2025 (5 pages)

South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

January 10, 2025

jimmywong@santafesprings.org

Jimmy Wong, Associate Planner
Santa Fe Springs Community Development Department
11710 East Telegraph Road
Santa Fe Springs, California 90670

**Notice of Availability of Draft Environmental Impact (EIR) Report for the
Northwest Corner of Telegraph and Santa Fe Springs Project (Proposed
Project) (SCH: 2024050495)**

South Coast Air Quality Management District (AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Santa Fe Springs is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

South Coast AQMD Staff's Summary of Project Information in the Draft EIR

Based on the Draft EIR, the project consists of subdividing an approximately 26.77-acre parcel into two parcels that would be approximately 13.45 acres and 13.09 acres. The project would consist of demolishing an existing building and other structures onsite, ceasing an existing oil well activity and abandoning the existing on-site oil wells to construct two new warehouse buildings. Building 1 would be approximately 298,373 square feet and Building 2 would be approximately 286,305 square feet. Additional improvements include two proposed underground on site infiltration trenches, parking, loading docks, decorative landscaping, associated on-site infrastructure, and construction of a cul-de-sac driveway.¹ Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residential development) is located 357 feet south of the project site boundary.² Construction of the Proposed Project is anticipated to last approximately 18 months and is planned to begin the second quarter of 2025 and end the first quarter of 2027.³ The Proposed Project is located on the northwest corner of Santa Fe Springs Road and Telegraph Road (APN: 8005-015-05).⁴

A2.1

South Coast AQMD Staff's Comments

Cumulative Impacts during Operation

Based on the Draft Environmental Impact Report (EIR), the Proposed Project includes the construction of two buildings. Building 1 will encompass approximately 298,373 square feet,

A2.2

¹ Draft EIR, Page 3.

² *Ibid* Page 141.

³ *Ibid* Page 284.

⁴ *Ibid* Page 7.

Jimmy Wong

2

January 10, 2025

while Building 2 will cover about 286,305 square feet. As illustrated in Figure 3-7: Conceptual Site Plan,⁵ the project site is bordered by approved adjacent developments to the east and south. Additionally, existing warehouses are located to the west and north of the project site. Per CEQA Guidelines Section 15065(a)(3), South Coast AQMD staff is primarily concerned with the cumulative air quality impacts from increased concentrations of air toxics in the region. Pursuant to CEQA, which requires an analysis of direct, indirect, and cumulative impacts, South Coast AQMD has initiated a public process to develop additional guidance for evaluating cumulative air quality impacts from increased concentrations of air toxics for projects. To date, there have been five working group meetings (WGMs) dedicated to proposed cumulative impact policy development. For more general information on the WGMs, please visit South Coast AQMD's webpage.⁶

A2.2
cont.

Therefore, South Coast AQMD staff recommends that, at minimum, the Lead Agency perform a qualitative analysis to provide the potential cumulative impacts from air toxics in consideration by listing all surrounding past, present, and probable future projects. The Lead Agency may also perform a more detailed and robust quantitative analysis of cumulative air toxic and potential health risk implications to be included in the Final EIR.

Rule 2305: Warehouse Indirect Source Rule - Warehouse Actions and Investments To Reduce Emissions (WAIRE) Program

On May 7, 2021, South Coast AQMD's Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 316 – Fees for Rule 2305. Rules 2305 and 316 are new rules that will reduce regional and local emissions of nitrogen oxides (NOx) and particulate matter (PM), including diesel PM. These emission reductions will reduce public health impacts for communities located near warehouses from mobile sources that are associated with warehouse activities. Also, the emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt in to earn Points on behalf of their tenants if they so choose because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Since the Proposed Project consists of the development of a 584,678 square foot warehouse, the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the Proposed

A2.3

⁵ *Ibid* Page 91.

⁶ South Coast AQMD's Cumulative Impacts from Air Toxics for CEQA Projects:
[https://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-\(new\)](https://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new))

Jimmy Wong

3

January 10, 2025

Project that may help future warehouse operators meet their compliance obligation⁷. South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or waire-program@aqmd.gov. For implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.⁸

A2.3
cont.

South Coast AQMD Air Permits and Role as a Responsible Agency

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required. The final CEQA document, whether a MND or EIR, should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct,⁹ Rule 203 – Permit to Operate,¹⁰ Rule 401 – Visible Emissions,¹¹ Rule 402 – Nuisance,¹² Rule 403 – Fugitive Dust,¹³ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,¹⁴ Rule 1113 – Architectural Coating,¹⁵ Rule 1166 – VOC Contaminated Soil Excavation,¹⁶ Rule 1179 – Publicly Owned Treatment Works Operation,¹⁷ Regulation XIII – New Source Review,¹⁸ Rule 1401 – Air Toxics,¹⁹ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,²⁰ Rule 1470 – Requirements for Stationary Diesel Fueled Internal Combustion and Other Compression Ignition Engines,²¹ etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

A2.4

⁷ South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xciii/r2305.pdf>.

⁸ South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.

⁹ South Coast AQMD. Rule 201 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

¹⁰ South Coast AQMD. Rule 203 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.

¹¹ South Coast AQMD. Rule 401 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>.

¹² South Coast AQMD. Rule 402 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.

¹³ South Coast AQMD. Rule 403 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>.

¹⁴ South Coast AQMD. Rule 1110.2 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110.2.pdf>.

¹⁵ South Coast AQMD. Rule 1113 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>.

¹⁶ South Coast AQMD. Rule 1166 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

¹⁷ South Coast AQMD. Rule 1179 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf>.

¹⁸ South Coast AQMD. Regulation XIII available at <https://www.aqmd.gov/home/rules-compliance/rules-scnqmd-rule-book/regulation-xiii>.

¹⁹ South Coast AQMD. Rule 1401 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>.

²⁰ South Coast AQMD. Rule 1466 available <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.

²¹ South Coast AQMD. Rule 1470 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>.

Jimmy Wong

4

January 10, 2025

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. South Coast AQMD is concerned that the project description and analysis in its current form in the MND is inadequate to be relied upon for this purpose.

A2.4
cont.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

A2.5

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov should you have any questions.

A2.6

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

Jimmy Wong

5

January 10, 2025

SW:SG

LAC241204-02

Control Number

2.2 RESPONSE TO LETTER A2: SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, DATED JANUARY 10, 2025

Comment A2.1: This comment states that the South Coast Air Quality Management District (SCAQMD) has reviewed the Draft EIR for the NWC Telegraph SFS Project. This comment further provides a summary of the proposed Project as described in the Draft EIR. The commenter concludes with the proposed construction schedule, location of the project, and identifies the nearest sensitive receptor.

Response A2.1: This comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the DEIR, no further response is required or provided.

Comment A2.2: This comment states that SCAQMD is concerned with the cumulative air quality impacts from increased concentrations of air toxics in the region. The comment also states that SCAQMD has initiated a public process to develop additional guidance for evaluating cumulative air quality impacts for CEQA projects. The commenter also recommends that the Lead Agency perform a qualitative analysis of cumulative impacts by listing all surrounding past, present, and probable future projects and may also perform a quantitative analysis of cumulative air toxins.

Response A2.2: The comment regarding SCAQMD development of guidance for evaluating cumulative air quality impacts for CEQA projects has been noted.

The Draft EIR lists the cumulative projects in Draft EIR Table 5-1, *Cumulative Projects List* within Section 5.0, *Environmental Impact Analysis*. Also, as detailed in Draft EIR Section 5.1.7, *Cumulative Impacts*, based on guidance published in SCAQMD's *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*¹, if an individual project does not exceed the SCAQMD's thresholds for project-specific impacts, then it would also not result in a cumulatively considerable impact. As detailed throughout Draft EIR Section 5.1, *Air Quality*, the Project would not exceed any thresholds and impacts would be less than significant.

Impacts related to toxics and health effects are discussed on pages 5.1-27 through 5.1-29 of Section 5.1, *Air Quality* in the Draft EIR. As described, the SCAQMD states that it has been able to correlate potential health outcomes for very large emissions sources; specifically, Projects that emit 6,620 lbs./day of NO_x and 89,180 lbs./day of ROG are expected to result in approximately 20 premature deaths per year and 89,947 school absences due to O₃. However, the Project does not generate anywhere near 6,620 lbs/day of NO_x or 89,190 lbs/day of ROG emissions. The Project would generate up to 53.8 lbs/day of NO_x during construction and 54.0 lbs/day of NO_x during operations (0.8 percent of 6,620 lbs/day for both), and 69.8 lbs/day of ROG during construction with mitigation and 24 lbs/day of ROG during operations (0.08 percent and 0.03 of 89,190 lbs/day). Therefore, the emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level.

Additionally, based on existing SCAQMD recommendations for Mobile Source Health Risk Assessments, the combined construction and operational impacts of the proposed Project at the closest effected receptor is

¹ SCAQMD. (2003). *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*. <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf>

estimated at 2.49 in one million, which is less than the threshold of 10 in one million. At this same location, non-cancer risks were estimated to be less than 0.12, which would not exceed the applicable threshold of 1.0. As such, the Project would result in emissions that are far below existing SCAQMD thresholds.

Regarding cumulative risk, the Draft EIR applied a 0.25-mile (1,320 foot) distance from the Project to identify other development projects that could contribute to cumulative impacts. Table 5.1-17 of the Draft EIR (page 5.1-38) shows that the Project has a cumulative operational cancer risk impact of 3.00 in one million that is below the threshold of 10 in one million and a non-cancer risk maximum HI of <0.01 that is below the threshold of 1. Table 5.1-18 of the Draft EIR (page 5.1-38) shows that the combination of Project construction and cumulative operational cancer risks would be 2.95 in one million, also below the threshold of 10 in one million. Therefore, the Project's impacts on human health risks would not be cumulatively considerable and would be less than significant.

Comment A2.3: This comment states that SCAQMD's Rules 2305 and 316 require warehouse operators to comply with the emission reduction measures through WAIRE points, which can be earned by implementing specific actions, custom plans, or paying mitigation fees. It further states that the Proposed Project will need to comply with these requirements upon occupancy and recommends reviewing Rule 2305 to identify compliance obligations and potential mitigation measures.

Response A2.3: As discussed in Section 5.1.2.3, *Regional Regulations*, of the Draft EIR, the Project would be required to comply with the WAIRE Program to reduce operational emissions. The proposed Project has no known end-user, thus identifying specific measures at this time would be speculative. Compliance with the WAIRE Program would be required at the time of building occupation and would be verified through the City's permitting process. This comment does not raise any specific issues with adequacy of the Draft EIR. Thus, no further response is required.

Comment A2.4: This comment states that if the Project would require the use of new stationary and portable sources, air permits from SCAQMD will be required and the role of SCAQMD would change from a Commenting Agency to a Responsible Agency under CEQA. The comment continues by saying that if SCAQMD is identified as a Responsible Agency, the Lead Agency must consult with SCAQMD and is included in deciding on the adequacy of the CEQA Document. The comment concludes by saying that the Final CEQA document should include a discussion about any new stationary and portable equipment requiring SCAQMD permits, provide the evaluation of their air quality and greenhouse gas impacts, and to identify SCAQMD as a Responsible Agency.

Response A2.4: As discussed in Section 5.1.5, *Methodology*, of the Draft EIR, the proposed Project includes two emergency generators, two fire pumps, and 58 compressed natural gas forklifts. Emissions associated with the on-site equipment were calculated using CalEEMod and included in the analysis for operational emissions. The Project includes PPP AQ-3, which requires the Project to obtain a permit from SCAQMD for the proposed diesel fire pump and to comply with Rule 1470, which regulates the use of diesel-fueled internal combustion engines. Additionally, Section 3.0, *Project Description*, of the Draft EIR, originally stated that the Project would require ministerial approvals by SCAQMD. For clarification, Chapter 3.0, *Revisions to the DEIR*, of this Final EIR, has revised this statement to state that SCAQMD is a CEQA Responsible Agency. This comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

Comment A2.5: This comment states that the Lead Agency shall evaluate comments and prepare a written response at least 10 days prior to certifying the Final EIR. If the Lead Agency's position is at variance with recommendation provided in the comment letter, detailed reasons supported by substantial evidence in the record to explain why comments are not accepted must be provided.

Response A2.5: This comment does not raise any specific issue with the adequacy of the Draft EIR. According to CEQA Guidelines Section 15088(b), written responses to agency comments provided throughout the public comment period will be provided at least 10 days prior to the certification of the Final EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

Comment A2.6: This comment concludes the comment letter and provides a contact at the SCAQMD for further questions on the provided comment letter.

Response A2.6: This comment is conclusionary in nature and does not raise a specific issue with the adequacy of the Draft EIR; thus no further response is warranted or provided.

Comment Letter A3: California Department of Transportation, January 13, 2025 (3 pages)

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 7

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 266-3562

FAX (213) 897-1337

TTY 711

www.dot.ca.gov

Making Conservation
a California Way of Life

January 13, 2025

Jimmy Wong
City of Santa Fe Springs
11710 E. Telegraph Rd.
Santa Fe Springs, CA 90670

RE: NWC Telegraph and SFS: Draft EIR
GTS # 07-LA-2024-04697
SCH # 2024050495
Vic. LA 72 PM 4.26
LA 605 PM R20.643

Dear Jimmy Wong:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The Project proposes to subdivide the approximately 26.77-acre parcel into two parcels. The applicant for the proposed Project requests approval from the City of Santa Fe Springs to demolish the existing building on site, abandon the existing onsite oil wells, and construct two new warehouse buildings with parking, landscaping, and access improvements. The proposed Building 1 would be approximately 298,373 square feet (SF) with a FAR of 0.51. The proposed Building 2 would be approximately 286,305 SF with a FAR of 0.49. Additional improvements include parking, loading docks, decorative landscaping, associated onsite infrastructure, and construction of a cul-de-sac driveway. The City of Santa Fe Springs is the Lead Agency under the California Environmental Quality Act (CEQA).

A3.1

The closest state facilities are SR-72 and I-605. After reviewing the project's documents, Caltrans has the following comments:

VMT

The Project is subject to the City of Santa Fe Springs Guidelines which aim to reach the 2024 baseline of 18.3 total VMT. The Project is estimated to result in a total of 44.9% above the threshold. As such, the Project would result in a significant impact by conflicting with CEQA Guidelines Section 15064.3(b), and mitigation is required.

A3.2

Mitigation Measures:

Provide a safe and reliable transportation network that serves all people and respects the environment.

Jimmy Wong
January 13, 2025
Page 3 of 3

and reduce vehicle miles traveled, we recommend the implementation of further TDM strategies as an alternative to building an unnecessary amount of parking.

A3.7
cont.

Please be reminded any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Additionally, Caltrans recommends limiting large truck travel and construction traffic to off-peak commute hours. A permit will also be required for any heavy construction equipment and or materials that require the use of oversized transport vehicles on State highways. If construction traffic may impact State facilities, a detailed traffic control plan should be submitted to Caltrans for review.

A3.8

If you have any questions, please feel free to contact Jaden Oloresisimo, the project coordinator, at Jaden.Oloresisimo@dot.ca.gov and refer to GTS # 07-LA-2024-04697.

A3.9

Sincerely,

Anthony Higgins

Anthony Higgins
Acting LDR/CEQA Branch Chief

cc: State Clearinghouse

"Provide a safe and reliable transportation network that serves all people and respects the environment."

Jimmy Wong
January 13, 2025
Page 2 of 3

The Project would implement Transportation Demand Management (TDM) strategies to encourage employees carpooling, taking transit, and biking to work. The following mitigation measures has been identified by the Lead Agency to reduce the significant impact of the Project:

- Implement Commute Trip Reduction Marketing
- Provide Ridesharing Program
- Implement Subsidized or Discounted Transit Program
- Provide End-of-Trip Bicycle Facilities
- Provide Employer-Sponsored Vanpool
- Mandatory trip reduction requirements

A3.3

With the implementation of the Commute Trip Reduction Program, the Project VMT would be reduced to 21.1% above the 2024 baseline threshold. This would still result in a significant impact. However, Caltrans does not concur that this impact is unavoidable, as VMT per capita could be lowered further by prioritizing transit-oriented development and creating safe and accessible multi-modal transportation circulation improvements.

Complete Streets

In addition to the Project's mitigation measures, Caltrans encourages the Lead Agency to incorporate further multi-modal infrastructure to support further pedestrian and transit mobility. This infrastructure should include ADA-compliant design, adequate sidewalks, high visibility crosswalks, class IV bike lanes, reducing vehicle parking, and implementing bike parking to best create a fully accessible Complete Street. Caltrans recommends the following multimodal improvements:

A3.4

- Improve the facilities on Santa Fe Springs Road. Caltrans recommends that the Class II facility be restriped, potentially widening and/or providing a striped buffer for the Class II bike lanes or upgrading the lanes to a Class IV separated bikeway, and high visibility green paint be used at conflict points (driveways and intersections).
- Include visual indicators such as pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage, and striping should be used in addition to physical design improvements to indicate to motorists that they can expect to see and yield to people walking or riding bikes.
- Reducing the amount of car parking whenever possible. Research shows that abundant car parking enables and encourages driving, ultimately undermining a project's ability to encourage public transit and active modes of transportation. For any project to better promote public transit

A3.5

A3.6

A3.7

"Provide a safe and reliable transportation network that serves all people and respects the environment."

2.3 RESPONSE TO LETTER A3: CALIFORNIA DEPARTMENT OF TRANSPORTATION, DATED JANUARY 13, 2025

Comment A3.1: This comment provides a summary of the project description including associated infrastructure improvements.

Response A3.1: This comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR. Therefore, no further response is warranted or provided.

Comment A3.2: This comment states that the closest freeways are SR-72 and I-605 and further states the proposed project will result in a significant transportation impact as the Project would be 44.9 percent above the Vehicle Miles Traveled (VMT) impact threshold; therefore, mitigation is required.

Response A3.2: The comment regarding the nearby freeways is acknowledged. The Project's significant and unavoidable VMT impact is acknowledged at Draft EIR pages 5.9-11 to 5.9-13. The Project's VMT would still continue to exceed the baseline threshold by 21.1 percent even with mitigation, as discussed further under Response A3.3 below. No further response is required.

Comment A3.3: This comment states that although the Project would implement Transportation Demand Management (TDM) strategies to encourage employees carpooling, taking transit, and biking to work as well as other mitigation measures, the Project's VMT would only be reduced to 21.1 percent above the threshold. The commenter states that VMT impacts could be further reduced by prioritizing transit-oriented development and creating safe and accessible multi-modal transportation circulation improvements.

Response A3.3: As discussed on page 5.9-12 of the Draft EIR, the 2021 California Air Pollution Control Officers Association (CAPCOA) guidelines identify 34 transportation-related GHG emission reduction measures with 32 measures that reduce VMT as a quantified co-benefit. A majority of the measures, based on their description and their measure scale, are not applicable to the proposed uses. Six of the 34 VMT reduction measures were determined to be applicable to the proposed Project. These measures are included in the Project as Mitigation Measure TRA-1, which includes implementing a Commute Trip Reduction Program, subsidized transit passes, ridesharing programs, and end-of-trip bicycle facilities. The analysis in Section 5.9, *Transportation*, of the Draft EIR determined that despite these measures, the Project's VMT would remain 21.1 percent above the threshold and result in a significant and unavoidable impact.

The commenter suggests further reducing VMT impacts by prioritizing transit-oriented development and creating safe and accessible multi-modal transportation circulation improvements. The Project is consistent with the City of Santa Fe Springs General Plan land use designation of Industrial and zoning designation of Heavy Manufacturing (M-2). The suggestion to prioritize transit-oriented development is not feasible for this Project due to its intended industrial use. However, the Project includes design elements that support multi-modal transportation, such as 34 bicycle parking stalls and pedestrian connectivity improvements from an approximately 11-foot sidewalk connection, as discussed on page 5.9-8 of the Draft EIR.

Although the Project would implement all feasible mitigation measures, the significant VMT impact is unavoidable due to the nature of the proposed industrial use and existing infrastructure constraints. No additional feasible mitigation measures have been identified to further reduce the VMT impact below the threshold. The significant and unavoidable VMT impact is acknowledged in the Draft EIR. Therefore, the Project's transportation analysis complies with CEQA requirements, and no changes to the Draft EIR are required.

Comment A3.4: This comment encourages the Lead Agency to incorporate further multi-modal infrastructure inclusive of ADA-compliant design, adequate sidewalks, high visibility crosswalks, class IV bike lanes, reducing vehicle parking, and bike parking to support further pedestrian and transit mobility.

Response A3.4: As discussed in Section 5.9.6, *Environmental Impacts*, of the Draft EIR, the Project is consistent with Santa Fe Springs Active Transportation Plan and General Plan Circulation Element. Specifically, the Project will include 34 bicycle parking stalls for employee use that meet City requirements. Existing Class III bike lanes on Santa Fe Springs Road will remain accessible and may potentially be used by employees of the Project site, and the Project will not preclude the future development of proposed bike lane improvements identified in the General Plan.

The Project includes the construction of an onsite cul-de-sac driveway that would include an approximately 11-foot sidewalk. The proposed sidewalk would connect to the existing sidewalk on Hawkins Street, east of the Project site, on both sides of the street. The proposed sidewalk connection would be developed in accordance with the City of Santa Fe Springs General Plan and the City of Santa Fe Springs Municipal Code standards and guidelines, which are ADA-compliant. As a result, the Project would enhance existing pedestrian facilities.

While the comment recommends reducing vehicle parking, the Project complies with the City's Municipal Code requirements for parking to meet operational needs. Therefore, reducing parking would not align with City policies or operational requirements.

The Project's transportation analysis complies with CEQA requirements, and no changes to the Draft EIR are required.

Comment A3.5: This comment recommends improvement of facilities on Santa Fe Springs Road. The comment specifically recommends the Class II facility be restriped, potentially widening and/or providing a striped buffer for the Class II bike lanes, or that the lanes be upgraded to a Class IV separated bikeway, and high visibility green paint be used at conflict points.

Response A3.5: As discussed in Section 5.9, *Transportation*, of the Draft EIR, the Project will not make off-site roadway improvements or alter existing bike lane configurations along Santa Fe Springs Road. However, the Project will not preclude future improvements to the roadway or bike lanes as outlined in the Santa Fe Springs General Plan and Active Transportation Plan. Existing Class III bike lanes on Santa Fe Springs Road will remain accessible, and the Project includes bicycle parking stalls to support multi-modal transportation consistent with City requirements.

Within the Project vicinity, the City of Santa Fe Springs General Plan Circulation Element identifies Santa Fe Springs Road as a proposed buffered bike lane (Class IIB). The suggested upgrades to the bike lanes, including restriping and adding buffers or high-visibility paint, fall under the jurisdiction of the City of Santa Fe Springs and are not under the control of the Project applicant. The Project complies with City requirements for its scope and use and does not conflict with or hinder the implementation of future bike lane enhancements by the City. As such, impacts related to bike lane facilities on Santa Fe Springs Road are less than significant and no changes have been made to the EIR.

Comment A3.6: This comment recommends visual indicators such as pedestrian and bicyclist warning signage, flashing beacons, crosswalks, and signage be included. The comment further recommends that striping be used in addition to physical design improvements to indicate to motorists that they can expect to see and yield to people walking or riding bikes.

Response A3.6: The Project does not propose off-site improvements, including roadway signage or striping modifications. However, the Project will comply with all City requirements for on-site design, including providing adequate signage and markings to ensure safe internal circulation. Additionally, the Project does not preclude the City of Santa Fe Springs from implementing future roadway enhancements to improve safety along Santa Fe Springs Road or other adjacent roadways. No changes have been made to the Draft EIR and no further response is warranted.

Comment A3.7: This comment provides a recommendation to reduce the amount of parking whenever possible and states that research indicates that the amount of car parking supplied encourages and incentivizes personal car ownership and driving above all other forms of transportation. The comment concludes that further TDM strategies are recommended as an alternative to unnecessary parking.

Response A3.7: The Project is unable to decrease the amount of parking at the site as it must comply with the City's regulations. The Project provides parking as required by the City of Santa Fe Springs Municipal Code Section 155.481, *Required Parking*. Parking requirements for industrial Projects over 200,001 SF are 1 space per 2,000 SF of gross floor area. Consistent with City requirements and as described in Section 3.5.2, *Project Features*, of the Draft EIR, the Project includes 345 parking stalls for Building 1 and 339 parking stalls for Building 2, for a total of 684 parking stalls.

To incentivize alternative modes of transportation, and as required by the City, 20 percent (or 128 stalls) of the total 684 parking stalls will be Electric Vehicle parking stalls. The Project also includes 34 bicycle parking stalls for employees to use.

No changes have been made to the Draft EIR and further response is warranted.

Comment A3.8: This comment states that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. The comment also recommends that large truck travel and construction traffic be limited to off-peak commute hours. The comment concludes that a permit will also be required for any heavy construction equipment and oversized transport vehicles on State highways and if construction traffic will impact State facilities, a detailed traffic control plan should be submitted to Caltrans for review.

Response A3.8: The Project does not propose off-site roadway improvements and is not anticipated to require permits from Caltrans. However, if any future Project activities require work within the State Right-of-Way, the Project applicant or contractor will coordinate with Caltrans to obtain the necessary Encroachment Permits and submit any required traffic control plans for review. Additionally, the recommendation to limit large truck travel and construction traffic to off-peak hours will be considered during construction scheduling to minimize potential traffic impacts on State facilities. No changes have been made to the Draft EIR and further response is warranted.

Comment A3.9: This comment concludes the comment letter and provides a contact at Caltrans and reference number for further questions.

Response A3.9: This comment is conclusionary in nature and does not raise a specific issue with the adequacy of the Draft EIR; thus no further response is warranted or provided.

Comment Letter O1: Advocates for the Environment, January 8, 2025 (7 pages)

January 8, 2025

Advocates for the Environment

Jimmy Wong
Associate Planner
City of Santa Fe Springs
11710 Telegraph Road
Santa Fe Springs, CA 90670

A non-profit public-interest law firm
and environmental advocacy organization



Via U.S. Mail and email to jimmywong@santafesprings.org

Re: Comments on the Draft Environmental Impact Report for the Northwest Corner of
Telegraph and Santa Fe Springs Project

Dear Mr. Wong:

Advocates for the Environment submits the comments in this letter regarding the proposed Northwest Corner of Telegraph and Santa Fe Springs Project (**Project**), located near the cross streets of Santa Fe Springs Road, Telegraph Road, and Hawkins Street, in the City of Santa Fe Springs (**City**). This Project proposes to replace the existing building with two new warehouse buildings. Warehouse Building 1 would be 298,373 square feet, and Building 2 would be 286,305 square feet, for a total of 584,678 square feet on the 26.77-acre Project Site. We have reviewed the Draft Environmental Impact Report (**DEIR**) released in November 2024 and submit comments regarding the sufficiency of the DEIR's Greenhouse-Gas (**GHG**) analysis under the California Environmental Quality Act (**CEQA**).

O1.1

The City Should Require the Project to be Net-Zero

Given the current regulatory context and technological advancements, a net-zero significance threshold is feasible and extensively supportable. GHG emissions from buildings, including indirect emissions from offsite generation of electricity, direct emissions produced onsite, and from construction with cement and steel, amounted to 21% of global GHG emissions in 2019. (IPCC Sixth Assessment Report, Climate Change 2022, WGIII, Mitigation of Climate Change, p. 9-4.) This is a considerable portion of global GHG emissions.

It is much more affordable to construct new building projects to be net-zero than to obtain the same level of GHG reductions by expensively retrofitting older buildings to comply with climate change regulations. Climate damages will keep increasing until we reach net zero GHG emissions, and there is a California state policy requiring the state to be net-zero by 2045. It therefore is economically unsound to construct new buildings that are not net-zero.

O1.2

Environmental groups have achieved tremendous outcomes by litigation under CEQA. Two of the largest mixed-use development projects in the history of California, Newhall Ranch (now FivePoint Valencia), and Centennial (part of Tejon Ranch) decided to move forward as

10211 Sunland Blvd., Shadow Hills, CA 91040

(818) 650-0030 X101

dvw@aenv.org

CEQA Comment Letter to City of Santa Fe Springs
Northwest Corner of Telegraph and Santa Fe Springs Project

Page 2
January 8, 2025

net-zero communities after losing CEQA lawsuits to environmental groups. The ability for these large projects to become net-zero indicates that it is achievable, even for large-scale developments. The Applicant for this Project should do the same.

We urge the City to adopt net-zero as the GHG significance threshold for this project. This threshold is well-supported by plans for the reduction of GHG emissions in California, and particularly the CARB Climate Change Scoping Plans. The CARB 2017 Scoping Plan states that "achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development." (CARB 2017 Scoping Plan, p. 101.) Additionally, the CARB 2022 Scoping Plan reaffirms the necessity of a net zero target by expressing: "it is clear that California must transition away from fossil fuels to zero-emission technologies with all possible speed ... in order to meet our GHG and air quality targets." (CARB 2022 Scoping Plan, p. 184.) CARB further encourages a net-zero threshold in its strategies for local actions in Appendix D to the 2022 Scoping Plan. (CARB 2022 Scoping Plan, Appendix D p. 24-26.) Moving this Project forward as a net-zero project would not only be the right thing for the City to do, but also would help protect the City and the Applicant from CEQA GHG litigation.

O1.2
cont.

CEQA GHG Significance Analysis

The DEIR derived its GHG significance thresholds from the CEQA Appendix G Guidelines and concluded that the Project's GHG emissions would be less than significant, claiming that the Project would not generate GHG emissions that may have a significant effect on the environment and that the Project would be consistent with plans, policies, and regulations for the reduction of GHG emissions. (DEIR, p. 1-15.) The DEIR used CalEEMod to quantify the Project's annual emissions at 9,006 metric tons carbon dioxide equivalent (MTCO_{2e}) per year. (DEIR, p. 5.4-13.)

O1.3

The Chosen Threshold Is Not Supported by Substantial Evidence

The City chose a GHG significance threshold of 10,000 MTCO_{2e}/year (the **Threshold**) based solely on the SCAQMD's recommended threshold for industrial facilities, providing no other support for the threshold. (EIR, p. 5.4-10.) This is insufficient to provide substantial evidence for the Threshold. The City violated CEQA by relying on an unsubstantiated GHG significance threshold of 10,000 metric tons of carbon dioxide equivalent (MTCO_{2e}). A lead agency must support its chosen threshold by substantial evidence. (CEQA Guidelines § 15064.7(b).) The DEIR contains no justification for its choice of threshold. CEQA also requires that significance determinations are based on current regulations, as well as scientific and factual data. (CEQA Guidelines § 15064.4(b).) Thus, the Threshold is outdated because it

O1.4

10211 Sunland Blvd., Shadow Hills, CA 91040

(818) 650-0030 X101

dw@aenv.org

CEQA Comment Letter to City of Santa Fe Springs
Northwest Corner of Telegraph and Santa Fe Springs Project

Page 3
January 8, 2025

is not aligned with California's current reduction goals, including SB 32 and the 2022 Scoping Plan.

O1.4
cont.

The City Cannot Solely Rely on the SCAQMD's Recommendation

The SCAQMD adopted the 10,000 MTCO₂e threshold in 2009. It is summarized in a staff proposal that was adopted by motion on December 5, 2008 (the **Staff Proposal**).¹ A single-sheet summary of SCAQMD's Air Quality Significance Thresholds was posted in March 2023,² and includes a purported GHG threshold of 10,000 MTCO₂e/year for industrial facilities, but cites no source for this threshold, even though the sheet cites the SCAQMD CEQA Handbook as a source for its daily thresholds, and AQMD Rule 1303 and Rule 403 as sources for criteria air pollutants and ambient air quality standards. The Staff Proposal is therefore the only available authority supporting the Threshold.

O1.5

The City failed to analyze or provide its own support for why the Threshold is valid for this Project. The Threshold is not applicable to this Project because:

- the SCAQMD has no authority to set CEQA thresholds for projects for which it is not the lead agency;
- the rationale the SCAQMD used in establishing the 10,000 MTCO₂e threshold is not applicable to the Project;
- the City provides no substantial evidence supporting the Threshold in the DEIR.

The SCAQMD Has no Authority to Set CEQA Thresholds for Other Agencies

The DEIR assumes, with no explanation, that the Threshold is applicable to the Project. But the SCAQMD has no legal authority allowing it to set CEQA thresholds to be used by other agencies. The SCAQMD's enabling statute (Health & Safety Code §§ 40400-40540) provides no authority to the agency to issue CEQA regulations or thresholds for other agencies. CEQA Guidelines § 15064.7(b) encourages each agency to develop thresholds of significance for the agency itself to use but provides no authority for the SCAQMD to develop CEQA thresholds for other agencies to use. The Staff Report itself limits the application of the Threshold to "projects where the AQMD is the lead agency." (Staff Report, p. 3.)

O1.6

The SCAQMD does not have the authority to prescribe significance thresholds for which it is not the lead agency. Lead agencies may choose their own significance thresholds, but they must be supported by substantial evidence, which means "facts, reasonable assumptions predicated on facts, and expert opinion supported by facts." (14 CCR § 15064.7(b).) The

¹ <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds> - Board Letter and attachments

² <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25>

10211 Sunland Blvd., Shadow Hills, CA 91040

(818) 650-0030 X101

dw@aenv.org

CEQA Comment Letter to City of Santa Fe Springs
Northwest Corner of Telegraph and Santa Fe Springs Project

Page 4
January 8, 2025

burden is on the City to provide substantial evidence for the threshold that they chose, but merely adopting the SCAQMD threshold without providing supporting evidence is not sufficient. The City cannot rely on the SCAQMD's evidence supporting the threshold because the evidence that the SCAQMD used, which itself is inadequate and insufficient to provide substantial evidence, does not apply to this Project.

Furthermore, it makes no sense for different thresholds to apply in the various air districts; global warming is a global phenomenon, and a ton of GHGs emitted in Los Angeles has the same impact as a ton emitted in Madera County. Other districts have adopted much lower thresholds, such as the 1,100 MTCO₂e threshold recommended by the Sacramento Metro Air Quality Management District,³ or the County of San Bernardino's 3,000 MTCO₂e per year screening level.⁴ The DEIR did not explain why the Threshold is more appropriate for the Project than these lower thresholds adopted by jurisdictions.

O1.6
cont.

The SCAQMD's Basis for the Threshold Is Not Valid for Projects for Which SCAQMD Is Not the Lead Agency

The SCAQMD's rationale for adopting its 10,000 MTCO₂e numerical threshold does not apply to this Project. The SCAQMD recommended the threshold based on the rationale that it would reduce 90% of emissions from projects for which the SCAQMD is the lead agency. To arrive at the threshold, SCAQMD reviewed the natural-gas consumption for projects it permitted in 2006 and 2007, assuming that the vast majority of emissions came from burning natural gas. These tend to be heavy industrial projects such as manufacturers of cement and steel. The SCAQMD is not a lead agency for land use projects generally, which include "shopping malls, housing tracts, commercial or industrial parks, sports stadiums, etc."⁵

O1.7

The kinds of projects for which the SCAQMD is the lead agency are different from commercial or warehousing projects, which are typically much smaller. The vast majority of GHG emissions from warehouse projects come from mobile emissions, not the burning of natural gas, as is the case for this Project. While reducing emissions to below 10,000 MTCO₂e might achieve 90% emissions reductions for large industrial projects for which the SCAQMD is the lead agency, the mix of land-use projects in general, and warehouse projects in particular is

³ See Greenhouse Gas Thresholds for Sacramento County, SMAQMD
<https://www.airquality.org/LandUseTransportation/Documents/SMAQMDGHGThresholds2020-03-04v2.pdf>

⁴ See County of San Bernardino Greenhouse Gas Emissions Development Review Process Screening Tables, available at:
https://www.sbcounty.gov/uploads/LUS/GreenhouseGas/GHG_2021/GHG%20Revised%20Screening%20Tables%20-%20Adopted%209-20-2021.pdf

⁵ <https://www.aqmd.gov/home/rules-compliance/ceqa/frequently-asked-questions#:~:next=The%20South%20Coast%20AQMD%20typically%20analyzes%20CEQA%20analysis>

10211 Sunland Blvd., Shadow Hills, CA 91040

(818) 650-0030 X101

dw@aenv.org

CEQA Comment Letter to City of Santa Fe Springs
Northwest Corner of Telegraph and Santa Fe Springs Project

Page 5
January 8, 2025

very different from the mix of projects the SCAQMD analyzed when it decided that a 10,000 MTCO₂e threshold would capture 90% of GHG emissions within their district.

O1.7
cont.

The Threshold Does Not Conform to California's Climate Policy Goals

The Threshold is invalid because it is not aligned with the goals of the California Air Resources Board (CARB), which is the governing authority for the regulations of GHGs in California.⁵ CARB developed the 2022 Scoping Plan, which emphasizes that "any delays in action or insufficient action are a threat to public health and the environment." (2022 Scoping Plan, p. 22.) It also specifies that all of the actions in the 2022 Scoping Plan are necessary to achieve climate goals. (2022 Scoping Plan, p. 11.) Accordingly, if the Project is any of the specified actions in the 2022 Scoping Plan from being carried out without delay, then it will be inconsistent with the 2022 Scoping Plan. A numeric threshold, particularly one as large as 10,000 MTCO₂e, does not require that any certain measures are achieved. Therefore, staying under the threshold would not mean that the Project would adhere to the measures in the 2022 Scoping Plan in a timely manner.

O1.8

The Threshold Does Not Comply with SB 32

Only two of California's air districts (Bay Area and Sacramento) have created thresholds which address SB 32's reduction goal of GHG emissions 40% below 1990 levels by 2030. (California Air Resources Board 2022 Climate Change Scoping Plan, Appendix D, p. 26, footnote 67.) All the other thresholds adopted by air quality management districts, including the 10,000 MTCO₂e threshold recommended for industrial projects by the SCAQMD, are not consistent with current environmental policy in California. Consequently, the chosen Threshold is an outdated threshold not supported by substantial evidence.

O1.9

The EIR's GHG Analysis was an Inadequate Informational Document

The EIR did not include enough information to inform the public about the impact of GHGs on climate change. An EIR must be prepared with sufficient analysis to provide decision-makers with enough information to make an informed decision regarding potential environmental consequences. (14 Cal Code Regs §15151). Conclusions or opinions alone comprise an insufficient basis for an informational document; the DEIR must contain facts and analysis to support its significance conclusions. (*Sierra Club v County of Fresno* (2018) 6 Cal 5th 502, 522; *Citizens of Goleta Valley v Board of Supervisors* (1990) 52 C3d 553, 568.)

O1.10

Here, the Project's annual emissions were estimated to be 9,006 MTCO₂e, which were determined to be less than significant because of the exceedingly large chosen threshold of

O1.11

⁵ Assembly Bill 32, known as the Global Warming Solutions Act of 2006, mandated CARB to set and enforce GHG emissions standards across the state.

CEQA Comment Letter to City of Santa Fe Springs
Northwest Corner of Telegraph and Santa Fe Springs Project

Page 6
January 8, 2025

10,000 MTCO₂e. The City did not describe the lifetime impact that the Project would have over its 30-year lifespan, which would amount to 270,180 MTCO₂e.⁷ The EIR did not include any information of the annual impact or lifetime impact of the project on humans or the environment, which makes it impossible to make an informed decision on the potential environmental consequences of approving this project. Accordingly, the brief analysis that compared the estimated annual emissions to the numeric significance threshold is not sufficient on its own to demonstrate the potential environmental impact of this Project.

O1.11
cont.

Consistency with Identified Applicable Plans

The DEIR discussed the City General Plan and the 2022 Scoping Plan in its determination that the Project would not conflict with an applicable plan, policy, or regulation for GHG emissions reductions. This significance analysis violates CEQA by failing to acknowledge and analyze all applicable plans for the reduction of GHGs and its inconsistency with the 2022 Scoping Plan.

The 2022 Scoping Plan sets a goal for 50% of all industrial energy demand to be electrified by 2045 (2022 CARB Scoping Plan, p. 77).⁸ The DEIR does not demonstrate that the Project is consistent with this goal. Furthermore, the 2022 CARB Scoping Plan emphasizes decarbonizing industrial facilities by “displacing fossil fuel use with a mix of electrification, solar thermal heat, biomethane, low- or zero-carbon hydrogen, and other low-carbon fuels to provide energy for heat and reduce combustion emissions” (2022 CARB Scoping Plan, p. 208). The Project would not need to displace fossil fuel use to reduce its GHG emissions to below 10,000 MTCO₂e, and therefore it would be able to meet the existing threshold without complying with the 2022 Scoping Plan. Based on the analysis provided in the DEIR, the Project does not align with the objectives of the 2022 Scoping Plan.

O1.12

The Project is likely to rely on diesel fuel in its operations, potentially conflicting with the 2022 Scoping plan’s objectives. The DEIR does not address how the Project will contribute to or comply with the goal of electrifying 50% of industrial energy demand by 2045. Therefore, the Project conflicts with the goals of the 2022 Scoping Plan by not adequately reducing its reliance on fossil fuels and failing to incorporate sufficient low- or zero-carbon energy sources.

The DEIR Should Have Analyzed All Applicable Plans

The City chose, as its second GHG threshold, whether the Project would “conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of

O1.13

⁷ 9,006 MTCO₂e per year × 30 years = 270,180 MTCO₂e. The Project lifespan was estimated to be 30 years. (EIR, p. 5.4-10.)

⁸ 2022 Scoping Plan located at: <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>

10211 Sunland Blvd., Shadow Hills, CA 91040

(818) 650-0030 X101

dw@aenv.org

CEQA Comment Letter to City of Santa Fe Springs
Northwest Corner of Telegraph and Santa Fe Springs Project

Page 7
January 8, 2025

greenhouse gases." (DEIR, p. 1-15.) This language requires that the DEIR analyze the Project's consistency with all other applicable plans, not just the plans that the City prefers to analyze.

An agency must consider a project's GHG impact over time to reasonably evaluate the full extent of environmental impact as CEQA requires. The City estimated that the Project lifespan would be 30 years. (DEIR, p. 5.4-10.) Accordingly, the Project must show consistency with long-term State GHG goals to comply with CEQA. In particular, the DEIR must also demonstrate consistency with Executive Order B-55-18 (EO B- 55-18).

O1.13
cont.

EO B-55-18 requires the State of California to achieve carbon neutrality—net zero GHG emissions—by 2045. The Project is inconsistent with EO B-55-18 because it does not prohibit the use of gasoline, diesel, and natural gas. The use of truck fleets is expected to significantly contribute to fossil fuel consumption. Burning such non-renewable fuels results in substantial GHG emissions, preventing the Project from ever achieving carbon neutrality, unless it enters into agreements with the applicant and/or future tenant to ensure that fossil fuel use is on track to be eliminated by 2045 as required by EO B-55-18. Consequently, because the Project is inconsistent with applicable plans for the reduction of GHGs, it is significant under the second threshold.

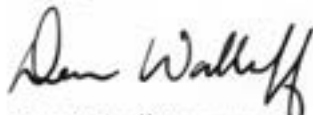
Conclusion

The City violated CEQA when it determined that the Project would have a less-than-significant GHG impact because the chosen threshold of 10,000 MTCO₂e lacked substantial evidence. The City did not meet its burden to provide substantial evidence for the 10,000 MTCO₂e GHG significance threshold, nor how the threshold applies to this Project. If the City had chosen a threshold that was supported by substantial evidence and the current GHG policy in California, including all applicable plans, policies and regulations for the reduction of GHG emissions, the Project's impacts would be significant.

O1.14

Please put Advocates for the Environment on the list of interested parties to receive updates about the progress of this potential project approval. We make this request under Public Resources Code, section 21092.2.

Sincerely,



Dean Wallraff, Attorney at Law
Executive Director, Advocates for the Environment

10211 Sunland Blvd., Shadow Hills, CA 91040

(818) 650-0030 X101

dw@aenv.org

2.4 RESPONSE TO LETTER O1: ADVOCATES FOR THE ENVIRONMENT, DATED JANUARY 8, 2025

Comment O1.1: This comment states that Advocates for the Environment submits this comment letter regarding the Draft EIR for the Northwest Corner of Telegraph and Santa Fe Springs Project with comments regarding the sufficiency of the Draft EIR's GHG analysis. The comment also provides a summary of the proposed Project.

Response O1.1: This comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

Comment O1.2: This comment states that the proposed Project should utilize a net-zero significance threshold for GHG emissions in order to comply with California's policy to be net-zero by 2045. The comment then lists examples of two large mixed-use projects in California that utilized net-zero thresholds. The comment further states that the net-zero GHG significance threshold is well-supported by plans such as the CARB Climate Change Scoping Plan, and urges the City to adopt the threshold. The comment concludes with a statement that the Project would be protected from litigation if it were to move forward as a net-zero Project.

Response O1.2: The Project proposes industrial development at the site, whereas the examples provided in this comment refer only to non-industrial projects. Therefore, the examples provided in this comment do not necessarily apply to the Project. The application of a net-zero threshold is unprecedented for warehouse projects and would effectively result in a moratorium on such facilities within the City. While the application of a net-zero threshold may be appropriate and feasible for residential or mixed-use projects, such as the two mentioned by the commentor, it is not appropriate to apply such a threshold to warehouse projects where the vast majority of operational GHG emissions result from mobile-source emissions.

Moreover, this Project is located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD) and was evaluated against SCAQMD's thresholds and supported by substantial evidence. The Project was found to have less than significant impacts on GHG, as discussed on Section 5.4, *Greenhouse Gas Emissions*, of the Draft EIR, and therefore, no mitigation is required. The Project will comply with existing regulations and plans, programs, and policies related to GHG, as described in Section 5.4.8 of the Draft EIR.

Additionally, the 2022 CARB Scoping Plan includes overall state goals, therefore the referenced goal is not a Project-specific goal. The Project would provide contemporary, energy-efficient/energy-conserving design features and operational procedures, such as implementation of a commute trip reduction program (Mitigation Measure TRA-1). The proposed Project would not interfere with the State's implementation of AB 1279's target of 85% below 1990 levels and carbon neutrality by 2045 because it does not interfere with implementation of the GHG reduction measures listed in CARB's Updated Scoping Plan (2022), as discussed in Section 5.4, *Greenhouse Gas Emissions*, starting on page 5.4-13, of the Draft EIR. CARB's 2022 Scoping Plan reflects the 2045 target of a, 85% reduction below 1990 levels, set by Executive Order B-55-18, and codified by AB 1279. Therefore, the Project not being constructed as net zero emissions does not conflict with the GHG significance threshold or any plan, policy, or goal related to GHG. The comment does not contain any information requiring changes to the Draft EIR. No further response is warranted.

Comment O1.3: This comment states that the Draft EIR derived its GHG significance thresholds from the CEQA Appendix G Guidelines and concluded that the Project's GHG emission would be less than significant. The comment states that the Draft EIR used CalEEMod to quantify the Project's annual emissions at 9,006 MTCO_{2e} per year.

Response O1.3: This comment is a summary of determinations made in the GHG Analysis and does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

Comment O1.4: This comment states that the City chose a significance threshold of 10,000 MTCO₂e, but there is no evidence to support the threshold. The comment then states that the City violated CEQA by relying on an unsubstantiated GHG significance threshold and that the DEIR contains no justification for its choice of threshold. The comment concludes that CEQA requires that significance determinations be based on current regulations, as well as scientific and factual data therefore the threshold is outdated as it does not align with California's current reduction goals, including SB 32 and the 2022 Scoping Plan.

Response O1.4: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed starting on page 5.7-9 of the Draft EIR, the City has selected the interim 10,000 MTCO₂e/year threshold recommended by SCAQMD staff for industrial land use projects against which to compare Project-related GHG emissions. The 10,000 MTCO₂e per year threshold for industrial projects is now included in SCAQMD's March 2023 *South Coast AQMD Air Quality Significance Thresholds* document, cited by the commenter, which was published for use by local agencies.² This update was not noted in the Draft EIR, but has been added in Chapter 3, *Revisions to the Draft EIR*, of the Final EIR, as shown below for informational purposes, and does not change the analysis or findings in the Draft EIR.

In the absence of other thresholds of significance promulgated by the South Coast AQMD, the City of Santa Fe Springs has been using the South Coast AQMD's 10,000 MTCO₂e per year threshold for industrial warehousing projects and the draft thresholds for non-industrial projects the purpose of evaluating the GHG impacts associated with proposed general development projects. Other lead agencies through the Basin have also been using these adopted and draft thresholds. The City's evaluation of impacts under the 10,000 MTCO₂e per year threshold is also considered to be conservative since it is being applied to all of the GHG emissions generated by the project (e.g., area sources, energy sources, vehicular sources, solid waste sources, and water sources) whereas the SCAQMD's 10,000 MTCO₂e per year threshold applies only to the new stationary sources generated at industrial facilities.

Pursuant to CEQA Guidelines Section 15064.7, as Lead Agency, the City of Santa Fe Springs may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided that the decision of the City to adopt such thresholds is supported by substantial evidence. Not only is SCAQMD another public agency capable of recommending and adopting thresholds, but they are also considered to be experts in matters related to air quality and greenhouse gas emissions. Further, the 10,000 MTCO₂e threshold adopted by SCAQMD was derived based on substantial evidence, as further outlined in the SCAQMD Board Meeting Agenda for December 5, 2008.³ The threshold was adopted in compliance with EO S-3-05, which requires GHG emissions to be reduced to 80 percent below 1990 levels by 2050. Specifically, the threshold is based on an emission capture rate of 90 percent for all new stationary sources for new projects. Further, the 90 percent capture rate sets the emission threshold low enough to capture a substantial amount of projects that would contribute to cumulative statewide GHG emissions. Therefore, the 10,000 MTCO₂e threshold utilized by the City in the Draft EIR is based on

² South Coast Air Quality Management District. (2023). *South Coast AQMD Air Quality Significance Thresholds*. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

³ South Coast Air Quality Management District. (2008). *Agenda No. 31*. [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgboardsynopsis.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf)

substantial evidence and the GHG analysis within the Draft EIR is not flawed and no additional changes to the document are required.

SB 32 requires the State to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030. As discussed on Table 5.4-3 (page 5.4-14) of the Draft EIR, the Project is consistent with GHG emission reductions relative to the SB 32 target because it would comply with the Title 24, Part 6 building energy requirements along with other local and state initiatives that aim to achieve the 40% below 1990 levels by 2030 goal. Also, the Project would generate a net total of approximately 9,006 MTCO₂e per year, which would not exceed the screening threshold of 10,000 MTCO₂e per year; and therefore, is consistent with California's current reduction goals, including SB 32 and the 2022 Scoping Plan. The comment does not warrant any changes to the Draft EIR. No further response is warranted.

Page 5.4-10, Section 5.4.4, Thresholds of Significance, is revised as follows:

5.4.4 Thresholds of Significance

The SCAQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO₂ concentrations at 450 ppm, thus stabilizing global climate.

Based on the foregoing guidance, the City of Santa Fe Springs has elected to rely on compliance with a local air district threshold in the determination of significance of Project-related GHG emissions. Specifically, the City has selected the interim 10,000 MTCO₂e/year threshold recommended by SCAQMD staff for industrial land use projects against which to compare Project-related GHG emissions.

The City understands that the 10,000 MTCO₂e/year threshold for industrial uses was proposed by SCAQMD a decade ago and was adopted as an interim policy; however, no permanent, superseding policy or threshold has since been adopted. The 10,000 MTCO₂e/year threshold was developed and recommended by SCAQMD, an expert agency, based on substantial evidence as provided in the *Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold* (SCAQMD, 2008) document and subsequent Working Group meetings (latest of which occurred in 2010). **The only update to the South Coast AQMD's GHG thresholds since 2010 is that the 10,000 MTCO₂e per year threshold for industrial projects is now included in the South Coast AQMD's March 2023 South Coast AQMD Air Quality Significance Thresholds document that is published for use by local agencies.** SCAQMD has not withdrawn its support of the interim threshold and all documentation supporting the interim threshold remains on the SCAQMD website on a page that provides guidance to CEQA practitioners for air quality analysis (and where all SCAQMD significance thresholds for regional and local criteria pollutants and toxic air contaminants also are listed). Further, as stated by SCAQMD, this threshold “uses the Executive Order S-3-05 goal [80 percent below 1990 levels by 2050] as the basis for deriving the screening level” and, thus, remains valid for use in 2024 and for purposes of this Draft EIR. Lastly, this threshold has been used for hundreds, if not thousands of GHG analyses performed for projects located within the SCAQMD jurisdiction.

Thus, for purposes of this analysis, if Project-related GHG emissions do not exceed the 10,000 MTCO₂e/year threshold, then Project-related GHG emissions would clearly have a less-than-significant impact pursuant to Threshold GHG-1. On the other hand, if Project-related GHG emissions exceed 10,000 MTCO₂e/year, the Project would be considered a substantial source of GHG emissions.

Comment O1.5: This comment states that SCAQMD adopted the 10,000 MTCO₂e threshold in 2009, which is summarized in a staff proposal that was adopted on December 2008 (the Staff Proposal). The comment further states that a summary sheet of the SCAQMD's Air Quality Significance Threshold was posted in March 2023, and includes a purported GHG threshold of 10,000 MTCO₂e/year for industrial facilities, but cites no source for this threshold, other than the SCAQMD CEQA Handbook as a source for its daily thresholds, and AQMD Rule 1303 and Rule 403 as sources for criteria air pollutants and ambient air quality standards.

The comment states that the Staff Proposal is the only available authority supporting the Threshold, and claims that the City failed to analyze or provide its own support for why the Threshold is valid for this Project. The comment states that the Threshold is not applicable to this Project for the following reasons:

- the SCAQMD has no authority to set CEQA thresholds for projects for which it is not the lead agency;
- the rationale the SCAQMD used in establishing the 10,000 MTCO₂e threshold is not applicable to the Project;
- the City provides no substantial evidence supporting the Threshold in the DEIR.

Response O1.5: As discussed in Response O1.4, pursuant to CEQA Guidelines Section 15064.7, as Lead Agency, the City of Santa Fe Springs may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided that the decision of the City to adopt such thresholds is supported by substantial evidence. Not only is SCAQMD another public agency capable of recommending and adopting thresholds, but they are also considered to be experts in matters related to air quality and greenhouse gas emissions. Further, the 10,000 MTCO₂e threshold adopted by SCAQMD was derived based on substantial evidence, as further outlined in the SCAQMD Board Meeting Agenda for December 5, 2008.⁴

- **SCAQMD authority to set CEQA thresholds:** While the SCAQMD does not impose mandatory CEQA thresholds for projects under another lead agency's jurisdiction, the SCAQMD's GHG threshold recommendations have been widely utilized and recognized by lead agencies as a valid guideline for evaluating the significance of GHG emissions. The SCAQMD developed the 10,000 MTCO₂e/year threshold as part of its 2008 Staff Proposal to assist lead agencies in determining significance for industrial projects. As discussed on page 5.4-10 of the Draft EIR, the City of Santa Fe Springs elected to rely on compliance with the local air district's threshold in the determination of significance of Project-related GHG emissions. Further, as stated by SCAQMD, this threshold "uses the Executive Order S-3-05 goal [80 percent below 1990 levels by 2050] as the basis for deriving the screening level" and, thus, remains valid for use in 2024 and for purposes of this Draft EIR. Lastly, this threshold has been used for hundreds, if not thousands of GHG analyses performed for projects located within the SCAQMD jurisdiction.
- **Rationale for the threshold applicability to the Project:** The comment states that the rationale for the 10,000 MTCO₂e/year threshold does not apply to the Project. However, this threshold was specifically developed for industrial facilities, similar to the proposed Project, as discussed in the SCAQMD Board Meeting Agenda for December 5, 2008 (page 5, Applicability).⁴ The proposed Project's industrial nature makes the 10,000 MTCO₂e/year threshold an appropriate threshold for assessing impacts.
- **Substantial evidence supporting the Threshold:** As discussed on page 5.4-10 of the Draft EIR, the 10,000 MTCO₂e/year threshold was developed and recommended by SCAQMD, an expert agency, based on substantial evidence as provided in the *Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold* (SCAQMD, 2008) document and subsequent Working Group meetings (latest of which occurred in 2010). SCAQMD has not withdrawn its support of the interim threshold and all documentation supporting the interim threshold remains on the SCAQMD website on a page that provides guidance to CEQA practitioners for air quality analysis (and where all SCAQMD significance thresholds for regional and local criteria pollutants and toxic air contaminants also are listed). Further, as stated by SCAQMD, this threshold "uses the Executive Order S-3-05 goal [80 percent below 1990 levels by 2050] as the basis for deriving the screening level" and, thus, remains valid for use in 2024

⁴ South Coast Air Quality Management District. (2008). *Agenda No. 31*. [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgboardsynopsis.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf)

and for purposes of this Draft EIR. Lastly, this threshold has been used for hundreds, if not thousands of GHG analyses performed for projects located within the SCAQMD jurisdiction. Therefore, the Draft EIR provides substantial evidence supporting the 10,000 MTCO_{2e}/year threshold.

Comment O1.6: The comment states that the SCAQMD has no authority to set CEQA thresholds for other agencies and that while CEQA Guidelines § 15064.7(b) encourages each agency to develop thresholds of significance for the agency itself to use but provides no authority for the SCAQMD to develop CEQA thresholds for other agencies to use. The comment states that the Staff Report limits the application of the Threshold to projects where the AQMD is the lead agency. The comment further states that the SCAQMD does not have the authority to prescribe significance thresholds for which it is not the lead agency; and that, lead agencies may choose their own significance thresholds, but they must be supported by substantial evidence, which means “facts, reasonable assumptions predicated on facts, and expert opinion supported by facts.” (14 CCR § 15064.7(b).) The comment states that burden is on the City to provide substantial evidence for the threshold that they chose, but adopting the SCAQMD threshold without providing supporting evidence is not sufficient. Furthermore, the comment states that the City cannot rely on the SCAQMD’s evidence supporting the threshold because the evidence that the SCAQMD used, is itself inadequate and insufficient to provide substantial evidence, and is not applicable to this Project.

Lastly, the comment states that it does not make sense for different thresholds to apply in the various air districts; that global warming is a global phenomenon, and that a ton of GHGs emitted in Los Angeles has the same impact as a ton emitted in Madera County. The comment cites other districts that have adopted lower thresholds, such as the 1,100 MTCO_{2e} threshold recommended by the Sacramento Metro Air Quality Management District, or the County of San Bernardino’s 3,000 MTCO_{2e} per year screening level. The comment ends by stating that the DEIR did not explain why the Threshold is more appropriate for the Project than these lower thresholds adopted by jurisdictions.

Response O1.6: The comment correctly notes that the SCAQMD’s enabling statutes (Health & Safety Code §§ 40400-40540) do not grant the agency authority to mandate CEQA thresholds for other agencies. However, lead agencies under CEQA have discretion to adopt and apply thresholds recommended by other agencies, provided the thresholds are supported by substantial evidence.

The City of Santa Fe Springs, as the Lead Agency, is permitted to rely on the SCAQMD threshold to evaluate the proposed Project’s GHG emissions. CEQA Guidelines § 15064.7(b) encourages agencies to adopt their own thresholds or use those recommended by other entities, provided they are supported by substantial evidence. The SCAQMD is another public agency capable of recommending and adopting thresholds, and they are also considered to be experts in matters related to air quality and greenhouse gas emissions. The 10,000 MTCO_{2e} threshold adopted by the SCAQMD was derived based on substantial evidence, as further outlined in the SCAQMD Board Meeting Agenda for December 5, 2008. The threshold was adopted in compliance with EO S-3-05, which requires GHG emissions to be reduced to 80 percent below 1990 levels by 2050. Specifically, the threshold is based on an emission capture rate of 90 percent for all new stationary sources for new projects. Further, the 90 percent capture rate sets the emission threshold low enough to capture a substantial amount of projects that would contribute to cumulative statewide GHG emissions. Therefore, the 10,000 MTCO_{2e} threshold utilized by the City of Santa Fe Springs in the Draft EIR is based on substantial evidence and the GHG analysis within the Draft EIR is not flawed and no additional changes to the document are required.

Lastly, while climate change is a global phenomenon, the CEQA Guidelines require lead agencies to assess and mitigate project-specific and regionally significant environmental impacts. CEQA Guidelines Section 15064 (b) states that, “the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban area may be significant in a rural area.” As such, CEQA allows lead agencies to consider regional and local environmental conditions when evaluating a project’s impacts. The SCAQMD developed the 10,000 MTCO_{2e}/year threshold specifically for industrial projects within the

South Coast Air Basin, where industrial operations are a major source of GHG emissions. The thresholds adopted by other air districts or jurisdictions, such as Sacramento and San Bernardino, are tailored to their specific regional contexts. Therefore, the threshold of 10,000 MTCO₂e/year is appropriate for the Project as supported by substantial evidence and no additional changes to the document are required.

Comment O1.7: The comment claims that the SCAQMD's rationale for adopting its 10,000 MTCO₂e numerical threshold does not apply to this Project because the SCAQMD recommended the threshold based on the rationale that it would reduce 90% of emissions from projects for which the SCAQMD is the lead agency. The comment further states that, to arrive at the threshold, SCAQMD assumed that vast majority of emissions came from burning natural gas, which tend to be heavy industrial projects such as manufacturers of cement and steel.

The comment states that the SCAQMD is *not* a lead agency for land use projects and that the kinds of projects for which the SCAQMD is the lead agency are different from commercial or warehousing projects, which are typically much smaller. The comment further states that the vast majority of GHG emissions from warehouse projects come from mobile emissions, not the burning of natural gas, as is the case with this Project. Lastly, the comment claims that while reducing emissions to below 10,000 MTCO₂e might achieve 90% emissions reductions for large industrial projects for which the SCAQMD is the lead agency, the mix of land-use projects in general, and warehouse projects in particular is very different from the mix of projects the SCAQMD analyzed when it decided that a 10,000 MTCO₂e threshold would capture 90% of GHG emissions within their district.

Response O1.7: The comment states that the rationale for the 10,000 MTCO₂e/year threshold does not apply to the Project. However, this threshold was specifically developed for industrial facilities, similar to the proposed Project, as discussed in the SCAQMD Board Meeting Agenda for December 5, 2008 (page 5, Applicability).⁴ The SCAQMD states that the types of projects that the staff proposal would apply to include: AQMD rules, rule amendments, and plans, e.g., Air Quality Management Plans. It also states that, in addition, the AQMD may be the lead agency under CEQA for projects that require discretionary approval, i.e., projects that require discretionary air quality permits from the AQMD. As such, the threshold is also intended to be applicable to industrial development projects, like the proposed Project. The proposed Project's industrial nature makes the 10,000 MTCO₂e/year threshold an appropriate threshold for assessing impacts.

As discussed starting on Page 5.4-13 of the Draft EIR, the Project is consistent with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions, including SB 32 targets. These policies do not differentiate between the types of GHG sources but focus on reducing overall emissions across sectors. As shown on Table 5.4-3 of the Draft EIR (Page 5.4-13), the Project would comply with the Title 24, Part 6 building energy requirements along with other local and state initiatives that aim to achieve the 40% below 1990 levels by 2030 goal.

Therefore, the threshold of 10,000 MTCO₂e/year is appropriate for the Project as supported by substantial evidence and no additional changes to the document are required.

Comment O1.8: This comment states that the threshold is not aligned with the goals of the California Air Resources Board (CARB), which is the governing authority for the regulations of GHGs in California. The comment further states that CARB states that “any delays in action or insufficient action are a threat to public health and the environment” and specifies that all of the actions in the 2022 Scoping Plan are necessary to achieve climate goals, which the Project must be consistent with. The comment concludes that the 10,000 MTCO₂e, does not require that any certain measures are achieved and does not result in adherence with the 2022 Scoping Plan in a timely manner.

Response O1.8: The CARB has not adopted statewide significance thresholds. As such, the City of Santa Fe Springs elected to rely on compliance with a local air district threshold in the determination of significance

of Project-related GHG emissions, as further discussed on page 5.4-10 of the Draft EIR. The comment does not provide evidence to support its claim that the 10,000 MTCO₂e threshold is inconsistent with the 2022 scoping plan. The Draft EIR evaluates the Project's consistency with the 2022 Scoping Plan starting on page 5.4-14 and in Table 5.4-3. As discussed in the Draft EIR, the Project would not conflict with achieving the State's climate targets. Key components of the 2022 Scoping Plan, such as GHG emission reduction goals, smart growth/vehicle miles traveled reduction goals, light duty vehicle and zero emission vehicle goals are incorporated into the analysis of the Project's GHG impacts and consistency with the 2022 Scoping Plan. With compliance with existing applicable policies and regulations and incorporation of Mitigation Measure TRA-1 included in the Draft EIR, the Project is consistent with these goals. Therefore, no changes have been made to the Draft EIR.

Comment O1.9: This comment states that only two of California's air districts (Bay Area and Sacramento) have created thresholds which address SB 32's reduction goal of GHG emissions 40% below 1990 levels by 2030. This comment states that the threshold adopted by SCAQMD does not address Senate Bill 32 and that the 10,000 MTCO₂e threshold is inconsistent and outdated.

Response O1.9: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The commenter misconstrues the information provided in the CARB 2022 Scoping Plan and AB 32. AB 32 and the CARB 2022 Scoping Plan include overall state goals; therefore, the referenced goal is not a Project-specific goal. The Project would provide contemporary, energy-efficient/energy-conserving design features and operational procedures. The proposed Project would not interfere with the State's implementation of AB 1279's target of 85 percent below 1990 levels and carbon neutrality by 2045 because it does not interfere with implementation of the GHG reduction measures listed in CARB's Updated Scoping Plan (2022), as discussed in Section 5.4, *Greenhouse Gas Emissions*, on page 5.8-13 in the Draft EIR. CARB's 2022 Scoping Plan reflects the 2045 target of an 85 percent reduction below 1990 levels, set by Executive Order B-55-18, and codified by AB 1279. Therefore, the commenter provides no substantial evidence of a significant environmental impact and no changes to the Draft EIR are warranted.

Comment O1.10: This comment claims that the Draft EIR did not include enough information to inform the public about the impact of GHGs on climate change. The comment further states that conclusions or opinions alone are not sufficient and the Draft EIR must contain facts and analysis to support its significance conclusions.

Response O1.10: Section 5.4, *Greenhouse Gas Emissions*, page 5.4-7 (*Environmental Setting*) of the Draft EIR provides a detailed description of the impacts of GHGs on climate change. The Draft EIR states that the major concern with GHGs is that increases in their concentrations are contributing to global climate change; Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature.

The Draft EIR quantifies the Project's GHG emissions, including emissions from construction activities and operational emissions, and compares them to the significance threshold (10,000 MTCO₂e/year), which is based on substantial evidence. As detailed in Section 5.4.5, *Methodology*, page 5.4-10 of the Draft EIR, a Greenhouse Gas Impact Analysis was prepared for the Project using the California Emissions Estimator Model (CalEEMod) version 2022.1.1.20 to determine construction and operational GHG emissions for buildout of the proposed Project, based on the maximum development assumptions outlined in Section 3.0, Project Description.

The DEIR supports its conclusions with facts, methodologies, and references to relevant guidance documents, including SCAQMD's GHG thresholds and CARB's Scoping Plan. These provide substantial evidence for the Draft EIR's findings, addressing the concern raised in *Sierra Club v. County of Fresno* that EIRs must include sufficient data and analysis to explain their conclusions. Therefore, the Draft EIR meets CEQA requirements for an informational document, enabling decision-makers and the public to make an informed evaluation of

the Project's environmental impacts. Therefore, the comment does not warrant any changes to the Draft EIR and no changes have been made.

Comment O1.11: This comment states that the Project's annual emissions of 9,006 MTCO₂e, were determined to be less than significant because of the exceedingly large chosen threshold of 10,000 MTCO₂e. The comment further states that the City did not describe the lifetime impact that the Project would have over its 30-year lifespan, which would amount to 270,180 MTCO₂e and that the Draft EIR did not provide information on the annual impact or lifetime impact of the project. The comment concludes that the analysis comparing the estimated annual emissions to the numeric significance threshold is not sufficient to determine impacts.

Response O1.11: As discussed on Page 5.4-10 of the Draft EIR, the City of Santa Fe Springs has elected to rely on compliance with a local air district threshold in the determination of significance of Project-related GHG emissions. The 10,000 MTCO₂e/year threshold was developed and recommended by SCAQMD, an expert agency, based on substantial evidence as provided in the *Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold* (SCAQMD, 2008) document and subsequent Working Group meetings (latest of which occurred in 2010).

CEQA Guidelines Section 15064.4(a), states that the lead agency has discretion to select the model or methodology it considers most appropriate provided it supports its decision with substantial evidence. Using annual thresholds is consistent with widely adopted methodologies, such as those developed by the SCAQMD, which assess annual emissions to determine a project's significance. The GHG impact analysis was prepared for the Project using CalEEMod version 2022.1.1.20 to determine construction and operational GHG emissions for buildout of the proposed Project, based on the maximum development assumptions outlined in Section 3.0, *Project Description*. The purpose of this model is to calculate construction-source and operational-source GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from measures incorporated into the Project to reduce or minimize GHG emissions. For construction phase Project emissions, GHGs are quantified and, per SCAQMD methodology, the total GHG emissions for construction activities are divided by 30 years and then added to the annual operational phase of GHG emissions.

In addition, CEQA requires the lead agency to consider the extent to which the Project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Compliance with these plans ensures that the Project supports long-term climate goals and does not conflict with statewide efforts to reduce GHG emissions. The Draft EIR evaluates the Project's consistency with State and regional GHG reduction policies, such as the CARB 2022 Scoping Plan and the SCAG RTP/SCS starting on page 5.4-13. As stated on page 5.4-13 of the Draft EIR, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Therefore, the Draft EIR provides substantial analysis for its determination that GHG impacts are less than significant. The comment does not warrant any changes to the Draft EIR and no changes have been made.

Comment O1.12: This comment states that the Draft EIR analyzed consistency with the 2022 CARB Scoping Plan and the City's General Plan but claims that the Draft EIR conflicts with the 2022 Scoping Plan and does not analyze all applicable GHG reduction plans. The comment specifically states that the Project does not show that the Project aligns with the Scoping plan goal to set 50% of all industrial energy demand to be electrified by 2045 and that the Project would not need to displace its fuel use because it is already below the 10,000 MTCO₂e threshold. The comment further states that the Project undermines the 2022 Scoping Plan by relying on fossil fuels for its operations through the use of heavy-duty trucks and therefore the Project is not consistent with the goal to electrify energy sources.

Response O1.12: The Draft EIR analyzes the Project's consistency with the 2022 CARB Scoping Plan and the City of Santa Fe Springs General Plan starting on page 5.4-13, Section 5.7, *Greenhouse Gas Emissions*. Regarding the Scoping Plan goal to set 50% of all industrial energy demand to be electrified by 2045, this goal is discussed in Table 5.4-3, in Section 5.4, *Greenhouse Gas Emissions*, of the Draft EIR. As stated, the Project would comply with the 2022 Title 24, Part 6 including energy efficiency and renewable energy generation requirements. As discussed in Section 5.2, *Energy*, page 5.2-7, of the Draft EIR, the Project would not preclude renewable energy use because buildings would be solar ready in compliance with current Title 24 requirements, which would allow for the future installation of rooftop solar. These measures align with the phased goals of the 2022 Scoping Plan.

Regarding the use of heavy-duty trucks, CARB regulations promote and will eventually require the use of zero-emission trucks at freight facilities, but exclusive reliance on such vehicles is not currently feasible due to limited availability, high costs, and inadequate charging infrastructure. Nationwide, fewer than 7,000 public DC fast chargers exist, most of which are unsuitable for heavy-duty trucks⁵, and upgrading the grid to accommodate ZEV fleets will require significant time and investment. Mandating all heavy-duty trucks serving the Project to be zero-emission would impose undue economic and operational burdens, and such a requirement is not feasible under CEQA. However, the Project would comply with applicable CALGreen standards, as noted on page 5.4-4 of the Draft EIR, which include that new construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. As such, the Project supports State goals for future electrification of heavy-duty trucks.

Therefore, the Draft EIR analyzed and demonstrated consistency with all applicable greenhouse gas reductions plans, and no changes have been made to the EIR.

Comment O1.13: This comment states that the Project must show consistency with long-term State GHG goals to comply with CEQA, specifically Executive Order (EO) B-55-18, which requires the State to achieve Carbon neutrality by 2045. The comment states that the Project is inconsistent with EO B-55-18 as it does not prohibit the use of gasoline, diesel, and natural gas and would include a cold storage component. The comment states that the Project would never be able to achieve carbon neutrality unless the Project ensures that fossil fuels are on track to be eliminated by 2045. The comment concludes that the Project would conflict with EO B-55-18 and the Project would be significant under the second GHG threshold.

Response O1.13: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed in Impact GHG-2 on page 5.4-13 of the Draft EIR, the Project would be consistent with AB 1279, which codified the State's goal of carbon neutrality by 2045. While the Draft EIR does not specifically list EO B-55-18 as a regulation the Project would be consistent with, it does demonstrate that the Project would be consistent with the Executive Order related to carbon neutrality goals. Further, EO B-55-18 was issued in 2018 ordering that CARB work toward setting up a framework to implement the goal. The actual state goal of carbon neutrality by 2045 was not codified until AB 1279 or adopted by CARB until the 2022 CARB Scoping Plan. Therefore, EO B-55-18 does not, in and of itself, represent an adopted state regulation, but merely a goal.

In regard to the Project not being able to achieve carbon neutrality, AB 1279, EO B-55-18, and the CARB 2022 Scoping Plan include overall state goals, therefore the goal of carbon neutrality is not a Project specific

⁵ Etengoff, Aharon; *What are the benefits and challenges of electric semi-trucks* (June 19, 2024) <https://www.evengineeringonline.com/what-are-the-benefits-and-challenges-of-electric-semi-trucks/>

goal. The Project would provide contemporary, energy-efficient/energy-conserving design features and operational procedures. The proposed Project would not interfere with the State's implementation of AB 1279's target of 85 percent below 1990 levels and carbon neutrality by 2045 because it does not interfere with implementation of the GHG reduction measures listed in CARB's 2022 Scoping Plan, as discussed in Section 5.4, *Greenhouse Gas Emissions*, starting on page 5.8-13 of the Draft EIR. CARB's 2022 Scoping Plan reflects the 2045 target of an 85 percent reduction below 1990 levels, set by EO B-55-18, and codified by AB 1279. Further, the Project would also meet the thresholds set forth by BAAQMD, given that the Project would not include natural gas plumbing; would not result in wasteful, inefficient, or unnecessary use of energy; and would comply with existing CALGreen standards. Therefore, the commenter provides no substantial evidence of a significant environmental impact, and no changes to the Draft EIR are required.

Comment O1.14: This comment concludes the letter by stating that the less than significant GHG impact violates CEQA as the 10,000 MTCO_{2e} threshold was not supported by substantial evidence and the Project is not consistent with applicable plans, policies, and regulations for the reduction of GHGs. The comment requests that Advocates for the Environment be added to the list of interested parties to receive updates on the progress of this potential Project approval under Public Resources Code Section 21092.2.

Response O1.14: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact and is conclusionary in nature. As substantiated by the responses above, none of the conditions arise which would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. No new significant environmental impact would result from the Project or from a new mitigation measure proposed to be implemented; there is no substantial increase in the severity of an environmental impact; no feasible project alternative or mitigation measure considerably different from others previously analyzed would lessen the environmental impacts of the proposed Project; and the Draft EIR is not fundamentally inadequate and conclusory in nature.

Advocates for the Environment will be added to the notification list for the Project and no further response is warranted.

This page intentionally left blank.

3. Revisions to the Draft EIR

3.1 INTRODUCTION

As provided in Section 15088(c) of the CEQA Guidelines, responses to comments may take the form of a revision to a Draft EIR or may be a separate section in the Final EIR. This section complies with the latter option and provides changes to the Draft EIR shown as strikethrough text (i.e., ~~strikethrough~~) signifying deletions and bold double-underlined text (i.e., **bold double-underlined**) signifying additions. These changes are meant to provide clarification, corrections, or minor revisions made to the Draft EIR initiated by the Lead Agency, City of Santa Fe Springs, reviewing agencies, the public, and/or consultants based on their review. Text changes are presented in the section and page order in which they appear in the Draft EIR. None of the corrections or additions constitute significant new information or substantial project changes that, in accordance with CEQA Guidelines Section 15088.5, would trigger the need to recirculate portions or all of the Draft EIR.

3.2 CHANGES TO THE DRAFT ENVIRONMENTAL IMPACT REPORT

The following text, organized by Draft EIR Sections, has been revised in response to comments received on the Draft EIR and corrections identified after the Public Draft EIR was released.

Section 1.0, Executive Summary

Page 1-1, Section 1.1, Project Location, is revised as follows:

1.1 Project Location

The proposed Project is located within the central portion of the City of Santa Fe Springs, at the northwest corner of Santa Fe Springs Road and Telegraph Road. Santa Fe Springs is located approximately 13 miles from Downtown Los Angeles, 39 miles from Downtown Riverside, and 14 miles from Long Beach. Regional access to the Project site is provided by Interstate 5 (I-5), Interstate 605 (I-605), and State Route 72 (SR-72). Local access to the Project site is provided via Telegraph Road and Santa Fe Springs Road.

The Project site is located within an unsectioned portion of Township 3 South, Range 11 West of the Whittier, California, United States Geological Survey (USGS) 7.5-minute Quadrangle. The Project site consists of one parcel encompassing approximately 26.77 acres and is generally located south of Telegraph Road, east of Santa Fe Springs Road, ~~north~~ **south** of McCann Drive, and east of Norwalk Boulevard. The site is identified by Assessor's Parcel Number 8005-015-051.

Section 3.0, Project Description

Page 3-1, Section 3.2, Project Location, is revised as follows:

3.2 Project Location

The proposed NWC Telegraph and SFS Project (the Project, or proposed Project) is located within the central portion of the City of Santa Fe Springs, at the northwest corner of Santa Fe Springs Road and Telegraph Road. Santa Fe Springs is located approximately 13 miles from Downtown Los Angeles, 39 miles from Downtown Riverside, and 14 miles from Long Beach. Regional access to the Project site is provided by Interstate 5 (I-5), Interstate 605 (I-605), and State Route 72 (SR-72). Local access to the Project site is provided via Telegraph Road and Santa Fe Springs Road.

The Project site is located within an unsectioned portion of Township 3 South, Range 11 West of the Whittier, California, United States Geological Survey (USGS) 7.5-minute Quadrangle. The Project site consists of one parcel encompassing approximately 26.77 acres and is generally located north of Telegraph Road, west of Santa Fe Springs Road, ~~north~~ south of McCann Drive, and east of Norwalk Boulevard. The site is identified by Assessor's Parcel Number 8005-015-051. The Project site and surrounding area are shown in Figure 3-1, *Regional Location*, and Figure 3-2, *Local Vicinity*.

Page 3-16, Section 3.5.2, Project Features, is revised as follows:

Parking and Loading Docks

Building 1 would include a total of 345 parking stalls, inclusive of 8 accessible stalls and 69 electric vehicle parking stalls, located along the west, north, and east sides of the building. In addition, bicycle racks would be installed near the office entrances located at the southwest and southeast corners of the building, providing 19 spaces for bicycle parking. Building 1 would include 40 dock doors and 48 truck trailer stalls located along the south side of the building.

Building 2 would include a total of 339 parking stalls, inclusive of 8 accessible stalls and 59 electric vehicle parking stalls, located along the west, south, and east sides of the building. In addition, a bicycle rack would be installed near the office entrances located at the northwest and southeast corners of the building, providing 18 spaces for bicycle parking. Building 2 would include 36 dock doors and 33 truck trailer stalls located along the north side of the building.

Page 3-33, Section 3.6, Discretionary Approvals and Permits, is revised as follows:

3.6 Discretionary Approvals and Permits

In accordance with Sections 15050 and 15367 of the State CEQA Guidelines, the City is the designated Lead Agency for the proposed Project and has principal authority and jurisdiction for CEQA actions and Project approval. Responsible Agencies are those agencies that have jurisdiction or authority over one or more aspects associated with the development of a proposed project and/or mitigation. Trustee Agencies are State agencies that have jurisdiction by law over natural resources affected by a proposed project.

The discretionary actions to be considered by the City, as Lead Agency, as part of the proposed Project include:

- Tentative Parcel Map.
- Development Plan Approval.
- Certification of the Environmental Impact Report.
- Approvals and permits necessary to execute the proposed Project, including but not limited to grading permit, building permit, etc.

In addition, the proposed industrial development will require ministerial approvals by other agencies that include, but are not limited to, the following Responsible Agencies:

- Regional Water Quality Control Board (RWQCB) and City for approval of a Stormwater Pollution Prevention Plan (SWPPP) and a Water Quality Management Plan.
- South Coast Air Quality Management District (SCAQMD) construction permits.
- California Geologic Energy Management (CalGEM) permits for well abandonment.

Section 4.0, Environmental Setting

Page 4-8, Section 4.4.11, Utilities and Service Systems, is revised as follows:

Wastewater

The wastewater generated within the City is collected by the City's local sewer system and the Los Angeles County Sanitation District (LACSD's) trunk sewer system, and treated by the Los Coyotes Water Reclamation Plant (LCWRP) and the ~~Long Beach Water Reclamation Plant (LBWRP)~~ **A.K. Warren Water Resource Facility (AKWWRF) (formerly known as the Joint Water Pollution Control Plant) (LACSD, 2025)** ~~(City of Santa Fe Springs, UWMP, 2021)~~. Currently, LCWRP has a design capacity of 37.5 million gallons/day (MGD) and an average flow of 21.7 MGD. ~~LBWRP~~ **AKWWRF** currently has a design capacity of ~~25~~ **400** MGD and an average flow of ~~12.6~~ **260** MGD. The two reclamation plants have a combined design capacity of ~~62.5~~ **437.5** MGD which is equivalent to approximately ~~70,055~~ **490,387** AFY **(LACSD, 2025)** ~~(UWMP, 2020)~~. The Project site would fall within the LCWRP's service area.

Section 5.4, Greenhouse Gas Emissions

Page 5.4-10, Section 5.4.4, Thresholds of Significance, is revised as follows:

5.4.4 Thresholds of Significance

The SCAQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO₂ concentrations at 450 ppm, thus stabilizing global climate.

Based on the foregoing guidance, the City of Santa Fe Springs has elected to rely on compliance with a local air district threshold in the determination of significance of Project-related GHG emissions. Specifically, the City has selected the interim 10,000 MTCO₂e/year threshold recommended by SCAQMD staff for industrial land use projects against which to compare Project-related GHG emissions.

The City understands that the 10,000 MTCO₂e/year threshold for industrial uses was proposed by SCAQMD a decade ago and was adopted as an interim policy; however, no permanent, superseding policy or threshold has since been adopted. The 10,000 MTCO₂e/year threshold was developed and recommended by SCAQMD, an expert agency, based on substantial evidence as provided in the *Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold* (SCAQMD, 2008) document and subsequent Working Group meetings (latest of which occurred in 2010). **The only update to the South Coast AQMD's GHG thresholds since 2010 is that the 10,000 MTCO₂e per year threshold for industrial projects is now included in the South Coast AQMD's March 2023 South Coast AQMD Air Quality Significance Thresholds document that is published for use by local agencies.** SCAQMD has not withdrawn its support of the interim threshold and all documentation supporting the interim threshold remains on the SCAQMD website on a page that provides guidance to CEQA practitioners for air quality analysis (and where all SCAQMD significance thresholds for regional and local criteria pollutants and toxic air contaminants also are listed). Further, as stated by SCAQMD, this threshold “uses the Executive Order S-3-05 goal [80 percent below 1990 levels by 2050] as the basis for deriving the screening level” and, thus, remains valid for use in 2024 and for purposes of this Draft EIR. Lastly, this threshold has been used for hundreds, if not thousands of GHG analyses performed for projects located within the SCAQMD jurisdiction.

Thus, for purposes of this analysis, if Project-related GHG emissions do not exceed the 10,000 MTCO₂e/year threshold, then Project-related GHG emissions would clearly have a less-than-significant impact pursuant to Threshold GHG-1. On the other hand, if Project-related GHG emissions exceed 10,000 MTCO₂e/year, the Project would be considered a substantial source of GHG emissions.

Section 5.5, Hazards and Hazardous Materials

Page 5.5-24 through 5.5-27, Section 5.5.8, Existing Regulations and Plans, Programs, or Policies, is revised as follows:

5.5.8 Existing Regulations and Plans, Programs, or Policies

Plans, Programs, or Policies

PPP HAZ-5: Well Abandonment. Pursuant to Municipal Code Section 117.127, *Criteria for Well Abandonment*, a well shall be considered properly abandoned for the purpose of this section when all of the following events have occurred:

- A. If applicable, any holes associated with a well have been filled with native earth and compacted to a 90% compaction factor.
- B. The derrick and all appurtenant equipment thereto have been removed from the drill site. All drilling and production equipment, tanks, towers and other surface installations used in connection with the well shall have been removed from the drill site or tank farm site. The cleaning of the site shall comply with the regulations of **the Geologic Energy Management Division (CalGEM), formerly the** Division of Oil, Gas and Geothermal Resources (DOGGR).
- C. All buried pipelines shall have been excavated and removed or, if approved by the Fire Chief, purged of all hydrocarbon substances and filled with water-base drilling mud or other inert materials. The surface of the land, insofar as practicable, has been left in a neat and orderly condition.
- D. The depth from ground level to the top of the well casing shall be a minimum of five feet and a maximum of 10 feet unless a different cut-off depth is approved by **CalGEM (formerly DOGGR)**.
- E. A permit to abandon the well shall be obtained from the Fire Department prior to abandonment. The Fire Chief or his designee shall witness the pouring of the last 25 feet of the cement well plug and the welding of a plate across the top of the well. The plate on the top of the abandoned well shall conform to current **CalGEM (formerly DOGGR)** requirements and include the date of abandonment. The Fire Chief or his designee shall inspect and certify in writing that the well has been properly abandoned in accordance with provisions of this section.
- F. A copy of the **CalGEM (formerly DOGGR)** Report of Well Abandonment or other final determination has been provided to the Fire Chief and the Director.

PPP HAZ-6: Prior to New Construction. Pursuant to Municipal Code Section 117.129, *Requirements Prior to New Construction*, prior to the issuance by the City of a building or grading permit for property upon which there are any active or abandoned wells, the applicant shall complete all of the following:

- A. Obtain a construction site well review from **CalGEM (formerly DOGGR)**.
- B. Conduct a soils gas study in accordance with § 117.131.
- C. Obtain a permit from the Fire Department to expose all former wells, survey their location and test each well for gas or fluid leaks under the supervision of an oil and gas professional authorized by the Fire Department. Conduct this leak test and submit results to the Fire Department.
- D. Provide a well access site map to the Planning Department for approval. The site map shall include all of the following:
 1. Detailed location of each well including the depth from ground level to the top of the well casing of each abandoned well in relation to finished grade.
 2. Demonstrate how vehicles and abandonment equipment will access each well from the public right-of-way.
 3. Demonstrate that adequate setbacks will be provided for setting up abandonment equipment around each well.
- E. Obtain a permit from the Fire Department for the installation of a vent cone and related equipment for all abandoned wells located below or in close proximity to the proposed new construction.
- F. Agree to implement all mitigation measures required by the Fire Chief including, but not limited to, installation and maintenance of methane barriers, vents/blowers, alarms and the like (collectively, "Methane Mitigation Systems").

- G. If applicant performs a leak test pursuant to § 117.129(C) and the test indicates the well is leaking, applicant shall abandon or reabandon the well pursuant to § 117.127.
- H. File an indemnity bond pursuant to Cal. Public Resources Code §§ 3204 or 3205.
- I. Execute and record against the property an environmental release and indemnity agreement providing that the property owner and his assignees, release, indemnify and hold harmless the city against any and all claims, obligations, and causes of action of any kind or nature whatsoever, known or unknown, for personal injury or death, property damage, economic loss, and fines and penalties. The City Attorney shall approve the form of the disclosure and indemnity agreement.

PPP HAZ-7: Reabandon Wells. Pursuant to Municipal Code Section 117.130, *Abandoned Wells That Do Not Meet Current CalGEM (formerly DOGGR) Standards*, if CalGEM (formerly DOGGR) determines that a well has not been abandoned to its current standards, the Director, in consultation with the Fire Chief, may conditionally authorize issuance of a building and/or grading permit for a property if the following conditions are met:

- (A) The applicant meets the requirements of § 117.129(A) through (I). For construction over an abandoned well, § 117.129(D) may be waived by the Director in consultation with the Fire Chief.
- (B) The applicant shall obtain, at his sole cost, a certified report from a California-licensed professional engineer or geologist qualified and experienced with oil well abandonment indicating that it is not reasonable or feasible for the applicant to do additional well abandonment work in order to meet current CalGEM (formerly DOGGR) abandonment standards. The engineer's or geologist's report shall:
 - (1) Demonstrate that, as abandoned, the well will not pose any significant risk to public health, safety, welfare or the environment.
 - (2) Demonstrate that (a) the well is a safe distance from any existing or proposed structures or improvements; and (b) in the event the Fire Department or CalGEM (formerly DOGGR) orders reabandonment of the well, the applicant has adequate access to the well. This requirement does not apply to construction over an abandoned well.
 - (3) Provide abandonment or mitigation measures that would be necessary to mitigate any long-term significant risks once the site is developed.
- (C) The applicant agrees to implement all methane mitigation systems required by the Fire Chief. The Fire Chief, in conjunction with the Director, is authorized to obtain expert analysis in order to determine whether the conditions identified in § 117.130 have been met. The cost of such expert analysis shall be paid by the applicant.

Section 5.10, Tribal Cultural Resources

Pages 5.10-5 through 5.10-6, Section 5.10.8, *Environmental Impacts*, is revised as follows:

5.10.6 Environmental Impacts

Based on literature review (i.e., records check and archival research) and pedestrian surveys, no prehistoric resource sites or isolates—including a historic TCR as defined by PRC Section 5020.1(k)—have been identified within the Project site (BFSA, 2024). Additionally, the potential for encountering archaeological resources including TCRs within the Project site is considered low due to the long-term disturbance of the site including clearing, grading, and the steady use for oil well drilling and extraction. However, construction of the proposed Project would include earthmoving activities to depths of 15 feet below the ground surface, which have the potential to disturb previously unknown tribal cultural resources. As a result, Mitigation Measure TCR-2 and ~~CUL-1~~ has been included. As mentioned previously, TCR-2 provides procedures in the case of an inadvertent TCR discovery. ~~Mitigation Measure CUL-1~~ **The existing Plans, Program, or Policy (PPP) CUL-2**, as detailed in the Initial Study, included in Appendix A of this DEIR, provides procedures for

an inadvertent discovery of an archaeological resource and procedures should it appear to have Native American origin.

The Project site also does not contain known resources that are significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. However, as mentioned previously, Mitigation Measure TCR-1 has been included to have a Native American monitor to be present for all ground disturbing activities to monitor for inadvertent discoveries during ground disturbing activities.

The Project would also include implementation of PPP CUL-1, in compliance with State Health and Safety Code Section 7050.5, to ensure proper procedures are taken should human remains be unearthed.

Therefore, with implementation of Mitigation Measures ~~CUL-1~~, TCR-1, TCR-2, TCR-3, and applicable regulations **and PPPs**, potential impacts to TCRs would be less than significant.

Page 5.10-6, Section 5.10.7, Cumulative Impacts, is revised as follows:

5.10.7 Cumulative Impacts

The cumulative study area for tribal cultural resources includes the City of Santa Fe Springs, which contains the same general tribal historic setting. Other projects throughout the City that would involve ground disturbances could reveal buried tribal cultural resources.

Cumulative impacts to tribal cultural resources would be reduced by compliance with applicable regulations and consultations required by AB 52. As described above, the Project area is not known to contain tribal cultural resources; however, Mitigation Measures ~~CUL-1~~ and TCR-1 through TCR-3 **and PPP CUL-1 and PPP CUL-2** would be implemented to ensure that impacts would not occur in the case of an inadvertent discovery of a potential tribal cultural resource. These mitigation measures **and PPPs** ensure that the Project would not contribute to a cumulative loss of tribal cultural resources. Therefore, potential cumulative impacts would be less than significant.

Page 5.10-6, Section 5.10.8, Existing Regulations and Plans, Programs, and Policies, is revised as follows:

5.10.8 Existing Regulations and Plans, Programs, and Policies

Plans, Programs, or Policies

PPP CUL-1: Human Remains. Should human remains or funerary objects be discovered during Project construction, the Project will be required to comply with State Health and Safety Code Section 7050.5, which states that no further disturbance may occur in the vicinity of the body until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine the identity of and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD must complete the inspection within 48 hours of notification by the NAHC.

PPP CUL-2: Inadvertent Discovery. In the event that potential archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the City or County List of Qualified Archaeologists has evaluated the find to determine whether the find constitutes a “unique archaeological resource,” as defined in Section 21083.2(g) of the California Public Resources Code. Any resources identified shall be treated in accordance with California Public Resources Code Section 21083.2(g). If the discovered resource(s) appears Native American in origin, a Native American Monitor shall be contacted to evaluate any

potential tribal cultural resource(s) and shall have the opportunity to consult on appropriate treatment and curation of these resources. The discovery would also be reported to the City and the South Central Coastal Information Center (SCCIC). Prior to the issuance of any permits for ground-disturbing activities that include the excavation of soils (including as grading, excavation, and trenching), the City shall ensure that all Project grading and construction plans and specifications include requirement to halt construction activity and contact an archaeologist as specified above.

Page 5.10-7, Section 5.10.10, *Mitigation Measures*, is revised as follows:

5.10.10 Mitigation Measures

~~CUL-1: Inadvertent Discovery.~~ In the event that potential archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the City or County List of Qualified Archaeologists has evaluated the find to determine whether the find constitutes a “unique archaeological resource,” as defined in Section 21083.2(g) of the California Public Resources Code. Any resources identified shall be treated in accordance with California Public Resources Code Section 21083.2(g). If the discovered resource(s) appears Native American in origin, a Native American Monitor shall be contacted to issuance of any permits for ground-disturbing activities that include the excavation of soils (including as grading, excavation, and trenching), the City shall ensure that all Project grading and construction plans and specifications include requirement to halt construction activity and contact an archaeologist.

Page 5.10-8, Section 5.10.11, *Level of Significance After Mitigation*, is revised as follows:

5.10.11 Level of Significance After Mitigation

Mitigation Measures ~~CUL-1~~, TCR-1, TCR-2, and TCR-3, as well as existing regulatory policies, would reduce potential impacts associated with TCRs for Impact TCR-1 (i and ii) to a level that is less than significant. Therefore, no significant and unavoidable adverse impacts related to TCRs would occur.

Section 5.11, Utilities and Service Systems

Page 5.11-9, Section 5.11.3.2, *Wastewater Services Environmental Setting*, is revised as follows:

5.11.3.2 Wastewater Services Environmental Setting

The wastewater generated within the City is collected by the City’s local sewer system and the Los Angeles County Sanitation District (LACSD’s) trunk sewer system, and treated by the Los Coyotes Water Reclamation Plant (LCWRP) and the Long Beach Water Reclamation Plant (LBWRP) **A.K. Warren Water Resource Facility (AKWWRF) (formerly known as the Joint Water Pollution Control Plant) (LACSD, 2025)** ~~(City of Santa Fe Springs, UWMP, 2021)~~. Currently, LCWRP has a design capacity of 37.5 million gallons/day (MGD) and an average flow of 21.7 MGD. ~~LBWRP~~ **AKWWRF** currently has a design capacity of ~~25~~ **400** MGD and an average flow of ~~12.6~~ **260** MGD. The two reclamation plants have a combined design capacity of ~~62.5~~ **437.5** MGD which is equivalent to approximately ~~70,055~~ **490,387** AFY **(LACSD, 2025)** ~~(UWMP, 2020)~~. The Project site would fall within the LCWRP’s service area.

Page 5.11-23, Section 5.11.6.5, *5.11.6.5 Electric Power, Natural Gas, and Telecommunications Environmental Impacts*, is revised as follows:

5.11.6.5 Electric Power, Natural Gas, and Telecommunications Environmental Impacts

Electric Power, Natural Gas, and Telecommunications Cumulative Impacts

Cumulative dry utilities assessment considers development of the Project in combination with the other development projects within the vicinity of the Project area, as listed in Section 5.0, *Environmental Impact Analysis*, of this Draft EIR. Cumulative impacts related to the provision of facilities for electricity, natural gas, and communications systems have been evaluated throughout this Draft EIR, primarily associated with the emissions resulting from construction. In addition, existing dry utility lines are present near the northern property line. The Project would install underground electric and communication lines that would connect to existing infrastructure which would also be undergrounded. Cumulative impacts related to need for new utilities that could result in an environmental impact would be less than significant.

4. Mitigation Monitoring and Reporting Summary

4.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires a lead or public agency that approves or carries out a project for which an Environmental Impact Report (EIR) has been certified, which identifies one or more significant adverse environmental effects and where findings with respect to changes or alterations in the project have been made, to adopt a "...reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment" (CEQA, Public Resources Code Sections 21081, 21081.6).

A Mitigation Monitoring and Reporting Program (MMRP) is required to ensure that adopted mitigation measures are successfully implemented. The City of Santa Fe Springs is the Lead Agency for the Project and is responsible for implementation of the MMRP. This report describes the MMRP for the Project and identifies the parties that will be responsible for monitoring implementation of the individual mitigation measures in the MMRP.

4.2 MITIGATION MONITORING AND REPORTING PROGRAM

The MMRP for the Project will be active through all phases of the Project, including design, construction, and operation. The attached table identifies the mitigation program required to be implemented by the City of Santa Fe Springs for the Project. The table identifies mitigation measures required by the City of Santa Fe Springs to mitigate or avoid significant impacts associated with the implementation of the Project, the timing of implementation, and the responsible party or parties for monitoring compliance.

The MMRP also includes a column that will be used by the compliance monitor (individual responsible for monitoring compliance) to document when implementation of the measure is completed. As individual Plans, Programs, and Policies and mitigation measures are completed, the compliance monitor will sign and date the MMRP, indicating that the required actions have been completed.

This page intentionally left blank.

Table 4-1: Mitigation Monitoring and Reporting Program

Plan, Program, Policy/ Mitigation Measure	Implementation Timing	Responsible Party/Verification	Date Completed and Initials
AIR QUALITY			
MM AQ-1: Low ROG/VOC Paint (Construction). Construction plans, specifications, and permitting shall require that during construction, the Project shall use “super-compliant” low volatile organic compound (VOC)/reactive organic gases (ROG) paints which have been reformulated to exceed the regulatory VOC limits (i.e., have a lower ROG/VOC content than what is required) put forth by SCAQMD’s Rule 1113 for all architectural coatings. Super-compliant low ROG/VOC paints shall contain no more than 50g/L of ROG/VOC. Prior to issuance of building permits, the City of Santa Fe Springs shall confirm that plans include the following specifications: All architectural coatings will be super-compliant low ROG/VOC paints, reduced from the industrial standard of 100 g/L VOC content paint, to a compliant VOC, not exceeding 50 g/L. - Recycle leftover paint. Take any leftover paint to a household hazardous waste center; do not mix leftover water-based and oil-based paint. - Keep lids closed on all paint containers when not in use to prevent VOC emissions and excessive odors. - For water-based paints, clean up with water only. Whenever possible, do not rinse the cleanup water down the drain or pour it directly into the ground or the storm drain. Set aside the can of cleanup water and take it to the hazardous waste center (Public Works Los Angeles County, 2018). - Use compliant low-VOC cleaning solvents to clean paint application equipment.	Prior to grading and construction permits	City of Santa Fe Springs Building & Safety Division	Initials: _____ Date: _____
PPP AQ-1: Rule 403. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 403, which includes the following: - All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions. - The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the project are watered, with complete coverage of disturbed areas, at least 3 times daily during dry weather; preferably in the mid-morning, afternoon, and after work is done for the day. - The contractor shall ensure that traffic speeds on unpaved roads and project site areas are reduced to 15 miles per hour or less.	Prior to demolition, grading, and construction permits	City of Santa Fe Springs Engineering Department & Building & Safety Division	Initials: _____ Date: _____

Plan, Program, Policy/ Mitigation Measure	Implementation Timing	Responsible Party/Verification	Date Completed and Initials
PPP AQ-2: Rule 1113. The Project is required to comply with the provisions of South Coast Air Quality Management District Rule (SCAQMD) Rule 1113. Only “Low-Volatile Organic Compounds” paints (no more than 50 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications shall be used.	Prior to demolition and construction permits	City of Santa Fe Springs Building & Safety Division	Initials: _____ Date: _____
PPP AQ-3: Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines. The Project is required to obtain a permit from SCAQMD for the proposed diesel fire pump and would be required to comply with Rule 1470, regulating the use of diesel-fueled internal combustion engines.	Prior to issuance of certificates of occupancy	City of Santa Fe Springs Building & Safety Division	Initials: _____ Date: _____
PPP AQ-4: Rule 402. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 402. The Project shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.	Prior to demolition and construction permits	City of Santa Fe Springs Building & Safety Division	Initials: _____ Date: _____
BIOLOGICAL RESOURCES			
PPP BIO-1 Migratory Bird Treaty Act. Vegetation removal should occur outside of the nesting bird season (generally between February 1 and September 15). If vegetation removal is required during the nesting bird season, the applicant must conduct take avoidance surveys for nesting birds prior to initiating vegetation removal/clearing. Surveys will be conducted by a qualified biologist(s) within three days of vegetation removal. If active nests are observed, a qualified biologist will determine appropriate minimum disturbance buffers and other adaptive mitigation techniques (e.g., biological monitoring of active nests during construction-related activities, staggered schedules, etc.) to ensure that impacts to nesting birds are avoided until the nest is no longer active. At a minimum, construction activities will stay outside of a 200-foot buffer around the active nests. The approved buffer zone shall be marked in the field with construction fencing and shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests.	Prior to the issuance of grading permits	City of Santa Fe Springs Community Development, Division and Engineering Department	Initials: _____ Date: _____
CULTURAL RESOURCES			
PPP CUL-1 Human Remains. Should human remains be discovered during Project construction, the Project will be required to comply with State Health and Safety Code Section 7050.5, which states that no further disturbance may occur in the vicinity of the body until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be	During ground-disturbing activities	City of Santa Fe Springs Community Development and	Initials: _____ Date: _____

Plan, Program, Policy/ Mitigation Measure	Implementation Timing	Responsible Party/Verification	Date Completed and Initials
notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine the identity of and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD must complete the inspection within 48 hours of notification by the NAHC.		Building & Safety Division	
PPP CUL-2 Inadvertent Discovery. In the event that potential archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the City or County List of Qualified Archaeologists has evaluated the find to determine whether the find constitutes a “unique archaeological resource,” as defined in Section 21083.2(g) of the California Public Resources Code. Any resources identified shall be treated in accordance with California Public Resources Code Section 21083.2(g). If the discovered resource(s) appears Native American in origin, a Native American Monitor shall be contacted to evaluate any potential tribal cultural resource(s) and shall have the opportunity to consult on appropriate treatment and curation of these resources. The discovery would also be reported to the City and the South Central Coastal Information Center (SCCIC). Prior to the issuance of any permits for ground-disturbing activities that include the excavation of soils (including as grading, excavation, and trenching), the City shall ensure that all Project grading and construction plans and specifications include requirement to halt construction activity and contact an archaeologist as specified above.	During ground-disturbing activities	City of Santa Fe Springs Community Development and Building & Safety Division	Initials: _____ Date: _____
GEOLOGY AND SOILS			
MM PAL-1: Paleontological Monitoring. Paleontological monitoring shall be required during mass grading and excavation activities in undisturbed alluvial deposits. Furthermore, full time paleontological monitoring shall be required in undisturbed alluvial deposits during excavation and grading activities starting at five feet below the surface. The following guidelines shall be implemented to reduce adverse impacts to paleontological resources to a level below significant. These guidelines follow the City of Santa Fe Springs’s guidelines and the recommendations of the Society of Vertebrate Paleontology: 1. All mitigation programs shall be performed by a qualified professional (Project) paleontologist, defined as an individual with a master’s or doctorate degree in paleontology or geology who has proven experience in paleontology and who is knowledgeable in professional paleontological procedures and techniques. Fieldwork shall be conducted by a qualified paleontological monitor, defined as an individual who has experience in the collection and salvage of fossil materials.	During ground-disturbing activities Monitoring during ground-disturbing activities	City of Santa Fe Springs Community Development and Building & Safety Division	Initials: _____ Date: _____

Plan, Program, Policy/ Mitigation Measure	Implementation Timing	Responsible Party/Verification	Date Completed and Initials
The paleontological monitor shall always work under the direction of a qualified paleontologist. 2. Prior to the issuance of a grading permit, the Project Applicant or developer shall provide written verification to the City of Santa Fe Springs Planning Department, or designee, stating that a professional paleontologist (who meets the Society of Vertebrate Paleontology's definition for qualified profession paleontologist) has been retained to implement the monitoring program. 3. Prior to initiation of any grading, drilling, and/or excavation activities, a preconstruction meeting shall be held and attended by the Project paleontologist, representatives of the grading contractor and subcontractors, the Project Applicant or developer, and a representative of the City of Santa Fe Springs. The nature of potential paleontological resources shall be discussed, as well as the protocol to be implemented following the discovery of any fossiliferous materials. 4. Monitoring of mass grading and excavation activities shall be performed by a qualified paleontologist or paleontological monitor. Starting at five feet below the surface, monitoring shall be conducted full-time in areas of grading or excavation in undisturbed soils. If paleontological resources are discovered, the area of the discovery shall be cordoned off and a qualified, project-level paleontologist shall be consulted to determine the significance of the finds. 5. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface or, if present, are determined by qualified paleontological personnel upon exposure and examination to have a low potential to contain or yield fossil resources. 6. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor shall have authority to temporarily halt or divert equipment to allow for the removal of abundant or large specimens in a timely manner. 7. Paleontological salvage during trenching and boring activities is typically from the generated spoils and does not delay the trenching or drilling activities. Fossils shall be collected and placed in cardboard flats or plastic buckets and identified by field number, collector, and date collected. Notes shall be taken on the map location and stratigraphy of the discovery site, and the discovery site will be photographed before it is vacated and the fossils are moved to a safe place. 8. In accordance with the "Microfossil Salvage" section of the Society of Vertebrate Paleontology Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources 2010 guidelines, bulk sampling and screening of fine-grained sedimentary deposits (including carbonate-rich			

Plan, Program, Policy/ Mitigation Measure	Implementation Timing	Responsible Party/Verification	Date Completed and Initials
paleosols) must be performed if the deposits are identified to possess indications of producing fossil “microvertebrates” to test the feasibility of the deposit to yield fossil bones and teeth. 9. Recovered specimens shall be prepared to a point of identification and permanent preservation. 10. All fossils shall be deposited in an accredited institution (university or museum) that maintains collections of paleontological materials. All costs of the paleontological monitoring and mitigation program, including any one-time charges by the receiving institution, shall be the responsibility of the developer. Typically, the Los Angeles County Museum of Natural History is the preferred repository for fossils found in Los Angeles County.			
HAZARDS AND HAZARDOUS MATERIALS			
PPP HAZ-1: SCAQMD Rule 1166. Prior to issuance of grading or excavation permits, the Project applicant shall submit verification to the City Building and Safety Division that it has applied for and obtained a SCAQMD Rule 1166 Contaminated Soil Mitigation Plan that includes but is not limited to the following, as required by SCAQMD. Monitor for VOC contamination at least once every 15 minutes commencing at the beginning of excavation or grading and record all VOC concentration readings. Handling VOC-contaminated soil at or from an excavation or grading site shall segregate VOC-contaminated stockpiles from non-VOC contaminated stockpiles such that mixing of the stockpiles does not take place. VOC-contaminated soil stockpiles shall be sprayed with water and/or approved vapor suppressant and cover them with plastic sheeting for all periods of inactivity lasting more than one hour. A daily visual inspection shall be conducted of all covered VOC contaminated soil stockpiles to ensure the integrity of the plastic covered surfaces. Contaminated soil shall be treated or removed from an excavation or grading site within 30 days from the time of excavation.	Prior to issuance of grading or excavation permits	City of Santa Fe Springs Building & Safety Division	Initials: _____ Date: _____
PPP HAZ-2: SCAQMD Rule 1466. Prior to issuance of grading or excavation permits for soil that contains the potential to contain applicable toxic air contaminants that have been identified as contaminant(s) of concern per SCAQMD Rule 1466, the Project applicant shall conduct continuous direct-reading near real-time ambient monitoring of PM10. If the PM10 concentration exceeds 25 micrograms per cubic meter, per SCAQMD Rule 1466 measurement requirements, the owner or operator shall cease on-site earth-moving activities, apply dust suppressant to fugitive dust sources, or implement other dust control measures as necessary, per SCAQMD Rule 1466 specifications, until the PM10 concentration is equal to or less than 25 micrograms per cubic meter averaged over 30 minutes.	Prior to issuance of grading or excavation permits	City of Santa Fe Springs Building & Safety Division	Initials: _____ Date: _____

Plan, Program, Policy/ Mitigation Measure	Implementation Timing	Responsible Party/Verification	Date Completed and Initials
PPP HAZ-3: SCAQMD Rule 1403. Prior to issuance of demolition, grading, or excavation permits, the Project applicant shall submit verification to the City Building and Safety Division that an asbestos survey has been conducted at all existing buildings located on the Project site. If asbestos is found, the Project applicant shall follow all procedural requirements and regulations of South Coast Air Quality Management District Rule (SCAQMD) 1403. Rule 1403 regulations require that the following actions be taken: notification of SCAQMD prior to construction activity, asbestos removal in accordance with prescribed procedures, placement of collected asbestos in leak-tight containers or wrapping, and proper disposal.	Prior to issuance of demolition, grading, or excavation permits	City of Santa Fe Springs Building & Safety Division	Initials: _____ Date: _____
PPP HAZ-4: Lead. Prior to issuance of demolition, grading, or excavation permits, the Project applicant shall submit verification to the City Building and Safety Division that a lead-based paint survey has been conducted at all existing building structures located on the Project site. If lead-based paint is found, the Project applicant shall follow all procedural requirements and regulations for proper removal and disposal of the lead-based paint. Cal-OSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, CCR Title 8, Section 1532.1 provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead.	Prior to issuance of demolition, grading, or excavation permits	City of Santa Fe Springs Building & Safety Division	Initials: _____ Date: _____
PPP HAZ-5: Well Abandonment. Pursuant to Municipal Code Section 117.127, <i>Criteria for Well Abandonment</i> , a well shall be considered properly abandoned for the purpose of this section when all of the following events have occurred: A. If applicable, any holes associated with a well have been filled with native earth and compacted to a 90% compaction factor. B. The derrick and all appurtenant equipment thereto have been removed from the drill site. All drilling and production equipment, tanks, towers and other surface installations used in connection with the well shall have been removed from the drill site or tank farm site. The cleaning of the site shall comply with the regulations of Geologic Energy Management Division (CalGEM). C. All buried pipelines shall have been excavated and removed or, if approved by the Fire Chief, purged of all hydrocarbon substances and filled with water-base drilling mud or other inert materials. The surface of the land, insofar as practicable, has been left in a neat and orderly condition. D. The depth from ground level to the top of the well casing shall be a minimum of five feet and a maximum of 10 feet unless a different cut-off depth is approved by CalGEM.	During ground-disturbing activities and prior to issuance of certificate of occupancy	City of Santa Fe Springs Building and Safety Division, Engineering Department, and Fire Department	Initials: _____ Date: _____

Plan, Program, Policy/ Mitigation Measure	Implementation Timing	Responsible Party/Verification	Date Completed and Initials
E. A permit to abandon the well shall be obtained from the Fire Department prior to abandonment. The Fire Chief or his designee shall witness the pouring of the last 25 feet of the cement well plug and the welding of a plate across the top of the well. The plate on the top of the abandoned well shall conform to current CalGEM requirements and include the date of abandonment. The Fire Chief or his designee shall inspect and certify in writing that the well has been properly abandoned in accordance with provisions of this section. F. A copy of the CalGEM Report of Well Abandonment or other final determination has been provided to the Fire Chief and the Director.			
PPP HAZ-6: Prior to New Construction. Pursuant to Municipal Code Section 117.129, <i>Requirements Prior to New Construction</i>, prior to the issuance by the City of a building or grading permit for property upon which there are any active or abandoned wells, the applicant shall complete all of the following: A. Obtain a construction site well review from CalGEM. B. Conduct a soils gas study in accordance with § 117.131. C. Obtain a permit from the Fire Department to expose all former wells, survey their location and test each well for gas or fluid leaks under the supervision of an oil and gas professional authorized by the Fire Department. Conduct this leak test and submit results to the Fire Department. D. Provide a well access site map to the Planning Department for approval. The site map shall include all of the following: 1. Detailed location of each well including the depth from ground level to the top of the well casing of each abandoned well in relation to finished grade. 2. Demonstrate how vehicles and abandonment equipment will access each well from the public right-of-way. 3. Demonstrate that adequate setbacks will be provided for setting up abandonment equipment around each well. E. Obtain a permit from the Fire Department for the installation of a vent cone and related equipment for all abandoned wells located below or in close proximity to the proposed new construction. F. Agree to implement all mitigation measures required by the Fire Chief including, but not limited to, installation and maintenance of methane barriers, vents/blowers, alarms and the like (collectively, "Methane Mitigation Systems").	Prior to the issuance by the City of a building or grading permit	City of Santa Fe Springs Community Development, Building and Safety Division, Engineering Department, and Fire Department	Initials: _____ Date: _____

Plan, Program, Policy/ Mitigation Measure	Implementation Timing	Responsible Party/Verification	Date Completed and Initials
G. If applicant performs a leak test pursuant to § 117.129(C) and the test indicates the well is leaking, applicant shall abandon or reabandon the well pursuant to § 117.127. H. File an indemnity bond pursuant to Cal. Public Resources Code §§ 3204 or 3205. I. Execute and record against the property an environmental release and indemnity agreement providing that the property owner and his assignees, release, indemnify and hold harmless the city against any and all claims, obligations, and causes of action of any kind or nature whatsoever, known or unknown, for personal injury or death, property damage, economic loss, and fines and penalties. The City Attorney shall approve the form of the disclosure and indemnity agreement.			
PPP HAZ-7: Reabandon Wells. Pursuant to Municipal Code Section 117.130, <i>Abandoned Wells That Do Not Meet Current CalGEM Standards</i>, if CalGEM determines that a well has not been abandoned to its current standards, the Director, in consultation with the Fire Chief, may conditionally authorize issuance of a building and/or grading permit for a property if the following conditions are met: (A) The applicant meets the requirements of § 117.129(A) through (I). For construction over an abandoned well, § 117.129(D) may be waived by the Director in consultation with the Fire Chief. (B) The applicant shall obtain, at his sole cost, a certified report from a California-licensed professional engineer or geologist qualified and experienced with oil well abandonment indicating that it is not reasonable or feasible for the applicant to do additional well abandonment work in order to meet current CalGEM abandonment standards. The engineer's or geologist's report shall: (1) Demonstrate that, as abandoned, the well will not pose any significant risk to public health, safety, welfare or the environment. (2) Demonstrate that (a) the well is a safe distance from any existing or proposed structures or improvements; and (b) in the event the Fire Department or CalGEM orders reabandonment of the well, the applicant has adequate access to the well. This requirement does not apply to construction over an abandoned well. (3) Provide abandonment or mitigation measures that would be necessary to mitigate any long-term significant risks once the site is developed. (C) The applicant agrees to implement all methane mitigation systems required by the Fire Chief. The Fire Chief, in conjunction with the Director, is authorized to obtain expert analysis in order to determine whether the conditions identified	Prior to the issuance of a building or grading permit by the City	City of Santa Fe Springs Community Development, Building and Safety Division, Engineering Department, and Fire Department	Initials: _____ Date: _____

Plan, Program, Policy/ Mitigation Measure	Implementation Timing	Responsible Party/Verification	Date Completed and Initials
in § 117.130 have been met. The cost of such expert analysis shall be paid by the applicant.			
PPP HAZ-8: Methane Mitigation System. Pursuant to Municipal Code Section 117.131, <i>Requirements for a Soils Gas Study or Methane Mitigation System</i>, a soil gas investigation to identify the concentration of methane gas in the subsurface is required for sites within 500 feet of an existing or abandoned oil well. Based on the results of the soils gas monitoring or on information available on surrounding properties, property owners shall implement any other mitigation measures as required by the Fire Chief. Methane mitigation systems shall be required for any regulated construction if any of the following apply: (1) The initial monitoring reveals methane levels in excess of 25% of the lower explosive limit (i.e., 1.25% by volume in air or 12,500 ppm/v). (2) The regulated construction will impede access to an abandoned oil well. (3) Quarterly or annual monitoring reveals methane levels greater than 25% of the lower explosive limit (i.e., 1.25% by volume in air or 12,500 ppm/v). The design of a methane mitigation system for property within the methane zone shall be in accordance with the requirements of the Los Angeles County Department of Public Works and City Fire Department and shall include permanent monitoring vapor probes above and below the barrier unless an alternative design is approved by the Fire Chief. Where gas detection systems are used, they shall be designed by and installed under the supervision of registered engineers. The design and installation shall be inspected and approved by the Fire Department. In extraordinary cases, for example, where methane in excess of 25% of the lower explosive limit (i.e., 1.25% by volume in air or 12,500 ppm/v) can be demonstrated to be a non-repetitive incident, a registered petroleum engineer or other qualified persons may request a waiver by the Fire Chief for the installation of a methane mitigation system. The granting of the waiver shall be at the discretion of the Fire Chief.	Prior to issuance of any grading permits	City of Santa Fe Springs Community Development, Building and Safety Division, Engineering Department, and Fire Department	Initials: _____ Date: _____
PPP HAZ-9: Hazardous Wastes. Pursuant to Municipal Code Section 152.33, <i>Extremely Hazardous Wastes</i>, any storage, treatment, disposal, or transportation of extremely hazardous waste as defined in Cal. Health and Safety Code § 25115, by	During grading/ excavation and construction activities	City of Santa Fe Springs Community Development, Building and Safety Division and Fire Department	Initials: _____ Date: _____

Plan, Program, Policy/ Mitigation Measure	Implementation Timing	Responsible Party/Verification	Date Completed and Initials
the facility owner/operator shall be reported to the Director of Planning and Fire Chief at least 48 hours prior to such storage, treatment, disposal, or transportation.			
PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Building and Safety Department with evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.	Prior to issuance of any grading permits	City of Santa Fe Springs Engineering Department	Initials: _____ Date: _____
PPP HYD-2: LID. Prior to the issuance of any grading permits, a completed Low Impact Development Plan (LID) shall be submitted to and approved by the City's Public Works Department. The LID shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.	Prior to the issuance of any grading permits	City of Santa Fe Springs Engineering Department	Initials: _____ Date: _____
MM HAZ-1: Soil Management Plan (SMP). Prior to issuance of a grading or excavation permit a SMP shall be approved by the City of Santa Fe Springs Fire Department as the Certified Unified Program Agency (CUPA), with responsibility for implementing federal and State laws and regulations pertaining to hazardous materials management. The SMP shall implement SCAQMD Rule 1166, RWQCB water quality regulations, and the following measures as deemed appropriate by the City of Santa Fe Springs Fire Department for each Project grading or excavation permit. 1) Preparation: The following activities will be performed prior to the start of earth moving activities: Agency Notification: At least 48 hours before the date of earth moving activities, the contact information for the environmental consulting project manager (a State of California Professional Geologist or Professional Engineer or supervised by one) will be provided to the CUPA via email along with a notification of the date that earthmoving operations and/or other preparation for redevelopment will begin.	Prior to issuance of a grading or excavation permit	City of Santa Fe Springs Building and Safety Division and Fire Department	Initials: _____ Date: _____

Plan, Program, Policy/ Mitigation Measure	Implementation Timing	Responsible Party/Verification	Date Completed and Initials
• SMP Training: The environmental consultant will provide a training session for all earth moving onsite personnel including superintendents. The training will ensure that all onsite personnel are familiar with the requirements of the SMP in an on-Site, pre-grading kick-off meeting. • PID Rental: A photo-ionization detector (PID) that shall be used to read concentrations of volatile organic compounds (VOCs) will be utilized by the environmental professional responsible for SCAQMD Rule 1166 permit monitoring. 2) Field Identification Procedures: Prior to grading or other earth moving activities, environmental consulting personnel shall train the earth moving superintendent in the recognition of impacted soil and the notifications required. When impacted soil is observed, the superintendent will notify the environmental consultant to visit the site to inspect the area. The superintendent shall also take digital photographs for email delivery to the environmental consultant. The superintendent shall communicate details regarding the potential environmental issue via telephone conversation immediately as practicable but not later than the end of the business day the potential environmental issue is encountered. Excavation in the area of VOC impacted soils will cease until the environmental professional mobilizes to the Site to further inspect. The pre-field training of earth moving personnel shall emphasize that any of the following observed conditions on the site will require notification to the superintendent (who will then communicate these conditions to the environmental consulting contact): • Discolored Soil: Observation of soil that is discolored with black, dark, multi-colored, white, or other discoloration when compared to the surrounding material. This condition may be indicative of potential chemical impact by asbestos, metals-containing compounds and/or petroleum hydrocarbon compounds and is especially effective for identification of heavier end hydrocarbons such as those found in crude oil. • Odorous Soil: Soil encountered that has a noticeable odor of anything other than a musty odor which is typically a result of mold (biological). This condition is indicative of potential chemical impact by volatiles and petroleum hydrocarbon compounds and is especially effective for identification of volatile compounds such as light end hydrocarbons or other crude oil components. • PID Use: Training shall include the proper use, calibration, startup, and shutdown of a PID.			

Plan, Program, Policy/ Mitigation Measure	Implementation Timing	Responsible Party/Verification	Date Completed and Initials
• PID Readings Sustained over 50 parts per million (ppm) for more than 10 seconds at 3 inches above the soil surface: If soil such as that described in 1 and 2 above is encountered, the superintendent shall take a reading with the PID and notify the environmental consultant of the location, soil observations, and PID readings. The environmental consultant may choose to inspect the area and compare the location with previous data to determine whether this is a new or known area. If readings over 50 ppm are sustained for more than 10 seconds 3 inches above the soil surface, this condition is indicative of potential chemical impact by VOCs. This field screening method will identify potential environmental issues related to diesel, gasoline, and volatile organic compounds. • Encounter of a previously unidentified feature: Any underground features such as underground pipes, tanks (USTs), or clarifiers that are encountered (which, upon observation by the environmental consultant, is deemed to have potentially been used to contain liquids or exhibits staining) will require removal, soil sampling, sample analysis, and evaluation of analytical results by the oversight environmental professional pursuant to a permit from the Santa Fe Springs Fire Department. 3) Procedures Following Identification of a Potential Environmental Issue: If discolored and/or odorous or soil with PID readings exceeding a sustained reading of 50 ppm is encountered, the following procedure shall be followed: a. The earth moving superintendent will inform the environmental consultant project manager as soon as possible but not later than the end of the business day the potentially impacted soil is encountered. b. Cease excavation in area of impact to allow environmental professional to mobilize to the site to observe the condition and oversee the excavation of odorous and discolored soil for separate stockpiling with pile identified as to the location of the area it came from. Stockpiles will be placed on plastic sheeting to protect underlying soil. The stockpile will be sampled according to the protocols in the next section and covered with plastic sheeting pending analytical results. c. The environmental consultant personnel may visit the site to observe the potentially impacted soil and collect samples if necessary. If necessary, the environmental consultant personnel will supervise removal of the soil, agency notifications, and sample collection. d. The environmental consultant will perform the following: a) Observation of the nature of and the condition of the area where the potentially impacted soil was found and comparison to site characterization and remediation data.			

Plan, Program, Policy/ Mitigation Measure	Implementation Timing	Responsible Party/Verification	Date Completed and Initials
b) One sample of potentially impacted soil per 250 cubic yards of soil removed. Samples used to characterize soil stockpiles may be composited. c) Soil samples from each impacted area will be analyzed for the following: i. TPH – 8015M ii. VOCs – 8260 iii. Title 22 metals iv. Samples from areas of unknown sources of TPH may also be analyzed for PCBs by EPA Method 8082 and for SVOCs by EPA Method 8270. e. As necessary, stockpiled soil that exceeds screening thresholds and cannot remain onsite shall be disposed of offsite according to all applicable regulations through oversight by the CUPA (Santa Fe Springs Fire Department) as documented in writing. f. Results of environmental oversight and performing the procedures of the SMP, including soil sampling results and analysis as well as the final disposition of sampled soils shall be provided in writing to the CUPA prior to issuance of additional construction permits.			
MM HAZ-2: Health and Safety Plan (HSP). Prior to ground-disturbing activities, including well abandonment, grading, trenching, excavation, or structure demolition a HSP shall be approved by the City of Santa Fe Springs Fire Department as the Certified Unified Program Agency (CUPA), with responsibility for implementing federal and State laws and regulations pertaining to hazardous materials management. The Project Applicant and/or the construction contractor(s) shall retain a qualified professional to prepare a site-specific HSP in accordance with federal Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1910.120) and California OSHA regulations (8 CCR Section 5192). HSPs shall be a condition of the well abandonment, grading, construction, and/or demolition permit(s). The HSP shall be implemented by the construction contractor to protect construction workers, the public, and the environment during all ground-disturbing activities from exposure to hazardous materials, including vapor and soil contamination. The HSP shall include, but not be limited to, the following elements: • Designation of a trained, experienced site safety and health supervisor who has the responsibility and authority to develop and implement the site HSP.	Prior to ground-disturbing activities	City of Santa Fe Springs Community Development, Building and Safety Division and Fire Department	Initials: _____ Date: _____

Plan, Program, Policy/ Mitigation Measure	Implementation Timing	Responsible Party/Verification	Date Completed and Initials
• The HSP shall be provide compliance with OSHA Safety and Health Standards and provide procedures in the event of release or human contact with hazardous materials during all construction activities. • A summary of all potential risks to construction workers and maximum exposure limits for all known and reasonably foreseeable site chemicals. • Specified personal protective equipment and decontamination procedures, if needed. • Gas monitoring devices – A 4 or 5 gas meter capable of measuring methane, hydrogen sulfide, oxygen and carbon monoxide shall be on Site during all work in place pursuant to the Soil Management Plan (SMP) (Mitigation Measure HAZ-1) to alert workers in the event elevated gas or other vapor concentrations occur when soil excavation is being performed. • In the event that elevated levels of subsurface gases are encountered during grading and excavation, the HSP shall address potential vapor encroachment from soil contamination or oil well infrastructure within and near the Project site and the environmental professional will be notified to respond to the Site. • A requirement specifying that any site worker who identifies hazardous materials has the authority to stop work and notify the site safety and health supervisor. • Contingency procedures shall be in place in the event that elevated gas concentrations are detected, such as the mandatory use of personal protective equipment, evacuation of the area, and/or increasing ventilation within the immediate work area. Workers shall be trained to identify exposure symptoms and implement alarm response. • Emergency procedures, including the route to the nearest hospital. • The requirement to prepare documentation showing that HSP measures have been implemented during construction (e.g., tailgate safety meeting notes with sign-up sheet for attendees, soils gas testing data).			
PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Building and Safety Department with evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.	Prior to issuance of any grading permits.	City of Santa Fe Springs Engineering Department	Initials: _____ Date: _____

Plan, Program, Policy/ Mitigation Measure	Implementation Timing	Responsible Party/Verification	Date Completed and Initials
PPP HYD-2: LID. Prior to the issuance of any grading permits, a completed Low Impact Development Plan (LID) shall be submitted to and approved by the City's Public Works Department. The LID shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.	Prior to issuance of any grading permits.	City of Santa Fe Springs Engineering Department	Initials: _____ Date: _____
TRANSPORTATION			
MM TRA-1 (CAPCOA Measures T-5 through T-11): Commute Trip Reduction Program. The City's operational and occupancy permitting shall include that the tenant shall be required (by contract specifications) to implement a Commute Trip Reduction (CTR) Program to encourage employees to carpool, take transit, and bike to work. 100% of employees shall be eligible to participate in all identified measures of the CTR Program. The mandatory CTR Program shall include all other elements (i.e., CAPCOA Measures T-7 through T-11) described for the voluntary program (Measure T-5) plus include mandatory trip reduction requirements (including penalties for non-compliance) and regular monitoring and reporting to ensure the calculated VMT reduction matches the observed VMT reduction. The specific components of the CTR Program are described below: 1. Implement Commute Trip Reduction Marketing (CAPCOA Measure T-7). The CTR marketing strategy shall include information sharing and marketing to promote and educate employees about their travel choices to the employment location. This measure shall require an on-site employee to assume the responsibilities of the transportation coordinator role, help provide commuter information services and facilitate on-site or online transit pass sales. 2. Provide Ridesharing Program (CAPCOA Measure T-8). The CTR Program shall include tenant-provided incentives for carpooling or vanpooling such as priority parking spaces and/or a daily or monthly stipend for participants. Additional incentives for carpool and/or vanpool drivers could also be provided. 3. Implement Subsidized or Discounted Transit Program (CAPCOA Measure T-9). The CTR Program shall include subsidized or discounted, or free transit passes for employees and/or residents. 4. Provide End-of-Trip Bicycle Facilities (CAPCOA Measure T-10). The CTR Program shall include installation and maintenance of end-of-trip facilities for employee use that facilitate bicycling to work. Facilities could include bike locks and bike racks. 5. Provide Employer-Sponsored Vanpool (CAPCOA Measure T-11). The CTR Program shall include implementation of an employer-sponsored vanpool service. Vanpooling is a flexible form of public transportation that provides groups of 5	Prior to issuance of certificates of occupancy	City of Santa Fe Springs Community Development	Initials: _____ Date: _____

Plan, Program, Policy/ Mitigation Measure	Implementation Timing	Responsible Party/Verification	Date Completed and Initials
to 15 people with a cost-effective and convenient rideshare option for commuting. 6. The CTR Program shall include mandatory trip reduction requirements (including penalties for non-compliance) and regular monitoring and reporting to ensure the calculated VMT reduction matches the observed VMT reduction (CAPCOA Measure T-6).			
TRIBAL CULTURAL RESOURCES			
PPP CUL-1: Human Remains. Should human remains or funerary objects be discovered during Project construction, the Project will be required to comply with State Health and Safety Code Section 7050.5, which states that no further disturbance may occur in the vicinity of the body until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine the identity of and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD must complete the inspection within 48 hours of notification by the NAHC.	During ground-disturbing activities	City of Santa Fe Springs Community Development and Building & Safety Division	Initials: _____ Date: _____
PPP CUL-2: Inadvertent Discovery. In the event that potential archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the City or County List of Qualified Archaeologists has evaluated the find to determine whether the find constitutes a “unique archaeological resource,” as defined in Section 21083.2(g) of the California Public Resources Code. Any resources identified shall be treated in accordance with California Public Resources Code Section 21083.2(g). If the discovered resource(s) appears Native American in origin, a Native American Monitor shall be contacted to evaluate any potential tribal cultural resource(s) and shall have the opportunity to consult on appropriate treatment and curation of these resources. The discovery would also be reported to the City and the South Central Coastal Information Center (SCCIC). Prior to the issuance of any permits for ground-disturbing activities that include the excavation of soils (including as grading, excavation, and trenching), the City shall ensure that all Project grading and construction plans and specifications include requirement to halt construction activity and contact an archaeologist as specified above.	During ground-disturbing activities	City of Santa Fe Springs Community Development and Building & Safety Division	Initials: _____ Date: _____
MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities. a. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor	Prior to issuance of permits associated with ground-disturbing activities	City of Santa Fe Springs Community Development and	Initials: _____

Plan, Program, Policy/ Mitigation Measure	Implementation Timing	Responsible Party/Verification	Date Completed and Initials
shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. b. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. c. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to Kizh Nation. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the tribe. d. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to Kizh Nation from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.	Monitoring during ground-disturbing activities	Building & Safety Division	Date: _____
MM TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial). Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh Nation monitor and/or Kizh Nation archaeologist. Kizh Nation will recover and retain all discovered TCRs in the form and/or manner the tribe deems appropriate, in the tribe’s sole discretion, and for any purpose the tribe deems appropriate, including for educational, cultural and/or historic purposes.	During ground-disturbing activities	City of Santa Fe Springs Community Development and Building & Safety Division	Initials: _____ Date: _____
MM TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects.	During ground-disturbing activities	City of Santa Fe Springs Community	Initials: _____

Plan, Program, Policy/ Mitigation Measure	Implementation Timing	Responsible Party/Verification	Date Completed and Initials
a. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. b. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). c. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). d. Preservation in place in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. e. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.		Development and Building & Safety Division	Date: _____

EXHIBIT A

**FINDINGS AND FACTS IN SUPPORT OF FINDINGS
FOR THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE
NWC TELEGRAPH SFS PROJECT
CITY OF SANTA FE SPRINGS, CALIFORNIA
STATE CLEARINGHOUSE NO. 2024050495**

1.0 INTRODUCTION

This statement of Findings of Fact (Findings) addresses the environmental effects associated with the proposed NWC Telegraph SFS Project (Project, or proposed Project), as described in the Environmental Impact Report (EIR). These Findings are made pursuant to the California Environmental Quality Act (CEQA) Public Resources Code, Section 21000 et seq., Section 21081, and CEQA Guidelines Section 15091. The Draft EIR examines the full range of potential effects of construction and operation of the Project and identifies standard mitigation practices that could be employed to reduce, minimize, or avoid those potential effects.

1.1 FINDINGS OF FACT

The CEQA, Public Resources Code Section 21000 et seq. and CEQA Guidelines, 14 Cal. Code of Regs. Section 15000 et seq. (collectively, CEQA) require that a public agency consider the environmental impacts of a project before a project is approved and make specific findings. CEQA Guidelines Section 15091, implementing Public Resources Code Section 21081, provides:

- (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR [referred to in these Findings as "Finding 1"].
 2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can or should be adopted by such other agency [referred to in these Findings as "Finding 2"].
 3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR [referred to in these Findings as "Finding 3"].
- (b) The findings required by subdivision (a) shall be supported by substantial evidence in the record.
- (c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subsection (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.
- (d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.
- (e) The public agency shall specify the location and custodian of the documents or other materials which constitute the record of the proceedings upon which its decision is based.
- (f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

CEQA Guidelines Section 15093 further provides:

- (a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.”
- (b) Where the lead agency approves a project which will result in the occurrence of significant effects which are identified in the Final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. This statement of overriding considerations shall be supported by substantial evidence in the record.
- (c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the Notice of Determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

Having received, reviewed, and considered the Draft Environmental Impact Report (DEIR) and the Final Environmental Impact Report (FEIR) for the NWC Telegraph SFS Project, SCH No. 2024050495 (collectively, the EIR), as well as all other information in the record of proceedings on this matter, the following Findings and Facts in Support of Findings (Findings) are hereby adopted by the City of Santa Fe Springs (City) in its capacity as the CEQA Lead Agency.

These Findings set forth the environmental basis for the discretionary actions to be undertaken by the City for the development of the Project. These actions include the approval of the Tentative Parcel Map and Development Plan Approval. This action is referred to herein as the Project.

All acronyms used herein shall have the meaning as defined in the DEIR.

1.2 RECORD OF PROCEEDINGS

For purposes of CEQA and these Findings, the Record of Proceedings for the proposed Project consists of the following documents and other evidence, at a minimum:

- The Notice of Preparation (NOP) and all other public notices issued by the City in conjunction with the proposed Project;
- The Final EIR (includes Draft EIR) for the proposed Project;
- All written comments submitted by agencies and members of the public during the public review comment periods on the Draft EIR;
- All responses to written comments submitted by agencies and members of the public during the public review comment period on the Draft EIR;
- The Mitigation Monitoring and Reporting Program (MMRP);
- The reports and technical memoranda included or referenced in the Response to Comments of the Final EIR;
- All documents, studies, EIRs, or other materials incorporated by reference in the Draft EIR and Final EIR;
- The Ordinances and Resolutions adopted by the City in connection with the proposed Project, and all documents incorporated by reference therein;
- Matters of common knowledge to the City, including but not limited to federal, State, and local laws and regulations;
- Any documents expressly cited in these Findings; and
- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e).

1.3 DOCUMENT FORMAT

These Findings have been organized into the following sections:

Section 1	Provides an introduction to these Findings.
Section 2	Provides a summary of the Project and overview of the discretionary actions required for approval of the Project, and a statement of the Project's objectives.
Section 3	Provides a summary of previous environmental reviews related to the Project area that took place prior to the environmental review done specifically for the Project, and a summary of public participation in the environmental review for the Project.
Section 4	Sets forth that the Draft EIR reflects the City's independent judgment.
Section 5	Sets forth findings regarding environmental impacts identified in the EIR which were determined not to be significant.
Section 6	Sets forth findings regarding environmental impacts identified in the EIR which can feasibly be mitigated to a less than significant level through the imposition of project design features, regulatory requirements, and/or mitigation measures. In order to ensure compliance and implementation, all of these measures are included in the Mitigation Monitoring and Reporting Program (MMRP) for the Project which shall be adopted by the City together with these Findings in accordance with Public Resources Code Section 21081.6. Where potentially significant impacts can be reduced to less than significant levels through adherence to project design features and regulatory requirements, these findings specify how those impacts were reduced to an acceptable level.
Section 7	Sets forth findings regarding environmental impacts identified in the EIR which were determined to be significant and unavoidable.
Section 8	Sets forth findings regarding growth inducing impacts.
Section 9	Sets forth findings regarding alternatives to the proposed Project.
Section 10	Sets forth findings regarding the Mitigation Monitoring and Reporting Program.
Section 11	Statement of Overriding Considerations.
Section 12	Certification of the Final EIR.
Section 13	Provides a summary of the conclusions.

1.4 CUSTODIAN AND LOCATION OF RECORDS

The documents and other materials which constitute the administrative record for the City's actions related to the Project are located at the City of Santa Fe Springs, 11710 East Telegraph Road, Santa Fe Springs, California 90670. The City is the custodian of the administrative record for the Project. This information is provided in compliance with Public Resources Code section 21081.6.

The record of proceedings for the City's decision on the Project consists of the following documents, at a minimum:

1. The NOP and all other public notices issued by the City in conjunction with the Project;
2. The Initial Study for the NWC Telegraph SFS Project;
3. The Draft EIR for the NWC Telegraph SFS Project, including technical appendices;
4. All comments submitted by agencies or members of the public during the 45-day comment period on the Draft EIR;
5. The Final EIR for NWC Telegraph SFS Project, including comments received on the Draft EIR, responses to those comments, and technical appendices;
6. The MMRP for the Project;
7. All findings, resolutions and ordinances adopted by the City in connection with the NWC Telegraph SFS Project and all documents cited or referred to therein;

8. All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the Project prepared by the City, consultants to the City, or responsible or trustee agencies with respect to the City's compliance with the requirements of CEQA and with respect to the City's action on the NWC Telegraph SFS Project;
9. All documents submitted to the City by other public agencies or members of the public in connection with the NWC Telegraph SFS Project up through Project approval.
10. Matters of common knowledge to the City, including, but not limited to federal, State, and local laws and regulations;
11. Any documents expressly cited or referenced in these findings, in addition to those cited above; and
12. Any other materials required for the record of proceedings by Public Resources Code section 21167.6, subdivision (e).

2.0 PROJECT SUMMARY

2.1 PROJECT LOCATION

The proposed NWC Telegraph and SFS Project (the Project, or proposed Project) is located within the central portion of the City of Santa Fe Springs, at the northwest corner of Santa Fe Springs Road and Telegraph Road. Santa Fe Springs is located approximately 13 miles from Downtown Los Angeles, 39 miles from Downtown Riverside, and 14 miles from Long Beach. Regional access to the Project site is provided by Interstate 5 (I-5), Interstate 605 (I-605), and State Route 72 (SR-72). Local access to the Project site is provided via Telegraph Road and Santa Fe Springs Road.

The Project site is located within an unsectioned portion of Township 3 South, Range 11 West of the Whittier, California, United States Geological Survey (USGS) 7.5-minute Quadrangle. The Project site consists of one parcel encompassing approximately 26.77 acres and is generally located north of Telegraph Road, west of Santa Fe Springs Road, south of McCann Drive, and east of Norwalk Boulevard. The site is identified by Assessor's Parcel Number 8005-015-051.

2.2 PROJECT DESCRIPTION

The Project proposes to subdivide the approximately 26.77-acre parcel into two parcels that would be approximately 13.45 acres and 13.09 acres. The proposed Project would demolish the existing building and other structures onsite, cease existing oil well activity and abandon the existing onsite oil wells, and construct and operate two new warehouse buildings with parking, landscaping, and access improvements. The proposed Building 1 would be approximately 298,373 square feet (SF) with a FAR of 0.51. The proposed Building 2 would be approximately 286,305 SF with a FAR of 0.49. Additional improvements include two proposed underground onsite infiltration trenches, parking, loading docks, decorative landscaping, associated onsite infrastructure, and construction of a cul-de-sac driveway. Abandonment of the oil wells would be conducted pursuant to the requirements listed under Sections 117.129 and 117.130 of the Santa Fe Springs Municipal Code.

Building and Architecture. The proposed Project consists of two new concrete tilt-up industrial warehouse buildings with a combined total building area of 584,678 SF and a combined total footprint of 564,678 SF. Building 1 would be located in the northern portion of the site on Parcel 1 and would have a total building area of 298,373 SF, inclusive of 5,000 SF of office space and 5,000 SF of mezzanine area. Building 1 would be one story and would have a maximum height of 52 feet. Building 1 would include a 78-foot and 3-inch setback from the western property line, a 73-foot setback from the northern property line, and a 73-foot setback from the eastern property line.

Building 2 would be located on the southern portion of the site on Parcel 2 and would have a total building area of 286,305 SF, inclusive of 5,000 SF of office space and 5,000 SF of mezzanine area. Building 2 would be one story and would have a maximum height of 52 feet. Building 2 would include a 78-foot and 3-inch setback from the western property line, a 31-foot setback from the southern property line, and a 31-foot setback from the eastern property line. The proposed buildings would be shades of white and grey with blue glazing.

Access and Circulation. Site access would be provided from two existing driveways and one proposed cul-de-sac driveway. The existing driveways located south of the Project site along Telegraph Road and east of the Project site along Santa Fe Springs Road are 28 feet wide. The proposed 64-foot-wide cul-de-sac driveway would be located west of the Project site, from Hawkins Street and would split into two 56-foot-wide onsite driveways.

Building 1 would be accessible via two driveways: the proposed 64-foot-wide driveway on Hawkins Street and the existing 28-foot-wide driveway on Santa Fe Springs Road. The proposed 64-foot-wide cul-de-sac driveway on Hawkins Street would allow for both automobile and truck access. The existing 28-foot-wide driveway on Santa Fe Springs Road would be restricted to left-in/right-in and right-out turns and would be accessible to automobiles. This access point would be via a reciprocal access agreement with the adjacent property owner(s).

Building 2 would be accessible via two driveways: the proposed 64-foot-wide driveway on Hawkins Street and the existing 28-foot-wide driveway on Telegraph Road. The proposed 64-foot-wide cul-de-sac driveway on Hawkins Street would allow for both automobile and truck access. The existing 28-foot-wide driveway on Telegraph Road would be restricted to right-in and right-out turns and would be accessible to automobiles. This access point would be via a reciprocal access agreement with the adjacent property owner(s).

Each building would be designed to function independently. However, the Project includes installation of a shared 26 to 31-foot-wide drive aisle for internal circulation. Access to the truck loading dock areas would be controlled by gates equipped with Knox pad locks for fire department access.

Loading Docks and Parking. Building 1 would include a total of 345 parking stalls, inclusive of 8 accessible stalls, located along the west, north, and east sides of the building. In addition, bicycle racks would be installed near the office entrances located at the southwest and southeast corners of the building, providing 19 spaces for bicycle parking. Building 1 would include 40 dock doors and 48 truck trailer stalls located along the south side of the building.

Building 2 would include a total of 339 parking stalls, inclusive of 8 accessible stalls, located along the west, south, and east sides of the building. In addition, a bicycle rack would be installed near the office entrances located at the northwest and southeast corners of the building, providing 18 spaces for bicycle parking. Building 2 would include 36 dock doors and 33 truck trailer stalls located along the north side of the building.

Landscaping and Walls. The proposed Project includes approximately 46,601 SF (1.07 acres) of landscaping on the parcel for Building 1 and 38,540 SF (0.88 acres) of landscaping on the parcel for Building 2, for a total of 85,141 SF (1.96 acres) of landscaping on the Project site. Proposed landscaping would include 24-inch and 36-inch box trees, various shrubs, and groundcovers. Landscape would be installed around the perimeter of the Project site, and throughout the parking areas, to screen the proposed buildings from public viewpoints.

A new 8-foot-high tube steel fence would be implemented along the southwestern, western, northern, and northeastern property line, which would connect to the existing tube steel fence along the southeastern property line. The truck court would be secured by a 14-foot-high concrete screen wall with two 10-foot-high tube steel sliding gates on the western side and one 10-foot-high tube steel sliding gate on the eastern side.

Infrastructure. The Project would install underground electric and communication lines that would connect to existing infrastructure which would also be undergrounded near the northern property line as part of the Project.

The Project site is located within the water service area of the Santa Fe Springs Water Utility Authority (SFSWUA) and the wastewater service area of Los Angeles County Sanitation Districts (LACSD). The proposed Project includes new domestic, fire, and irrigation water service lines that would connect to the existing 12-inch water main within Hawkins Street (west of the Project site). The existing water main lines are within the streets surrounding the Project site, and therefore, no water line extensions would be required.

The proposed Project would include installation of new onsite and offsite sewer lines. Proposed 6-inch sewer laterals would be located on the western portion of the site and would connect to a proposed 8-inch sewer main within Hawkins Street. The proposed 8-inch sewer main would extend approximately 250 feet west of the Project site and connect to the existing 8-inch main line in Hawkins Street.

The proposed Project would include construction of an onsite drainage system. The Project proposes to install several inlets and onsite drainage pipes to convey site runoff to two proposed underground onsite infiltration trenches that would filter and infiltrate storm water into the site soils and potentially into the groundwater. The two infiltration trenches would be 200 feet by 80 feet and 200 feet by 78 feet and would be located underground below the trailer stalls area, between Building 1 and Building 2.

As required by existing regulations, the Proposed onsite drainage infrastructure would have capacity to retain 85 percent of the Project site's Design Capture Volume (DCV). Overflow for both infiltration trenches will be conveyed to the existing storm drain along the site's eastern boundary, below Hawkins Street. Implementation of the Project would maintain existing drainage patterns of the Project site.

2.3 DISCRETIONARY ACTIONS

The City of Santa Fe Springs and the following responsible agencies are expected to use the information contained in this Draft EIR for consideration of approvals related to and involved in the implementation of this Project. These include, but may not be limited to, the permits and approvals described below.

As part of the proposed Project, the following discretionary actions and subsequent approvals are requested by the Project proponent:

- Tentative Parcel Map
- Development Plan Approval
- Certification of the Environmental Impact Report
- Ministerial approvals and permits necessary to execute the proposed Project, including but not limited to grading permit, building permit, etc.

In addition, the proposed industrial development will require ministerial approvals by other agencies that include, but are not limited to, the following:

- Regional Water Quality Control Board (RWQCB) and City for approval of a Stormwater Pollution Prevention Plan (SWPPP) and a Water Quality Management Plan
- South Coast Air Quality Management District (SCAQMD) construction permits
- California Geologic Energy Management (CalGEM) permits for well abandonment.

2.4 STATEMENT OF PROJECT OBJECTIVES

The following objectives have been identified in order to aid decision makers in their review of the proposed Project and its associated environmental impacts.

1. To make efficient use of an underutilized property in the City of Santa Fe Springs by redeveloping it with a modern industrial warehouse that adds to its potential for employment-generating uses and that aligns with the City's General Plan and zoning designations.
2. To redevelop an underutilized property with an industrial warehouse building near Interstate 5 and Interstate 605, to help meet demand for logistics business in the City and surrounding region.
3. To attract new business and employment to the City of Santa Fe Springs and thereby promote economic growth.
4. To build an industrial warehouse project in the City of Santa Fe Springs that is compatible with the surrounding industrial and manufacturing uses that were recently built or recently approved for construction in the City of Santa Fe Springs.

3.0 ENVIRONMENTAL REVIEW AND PUBLIC PARTICIPATION

The Final EIR (FEIR) incorporates the Draft EIR dated November 2024, written comments on the Draft EIR that were received during the public review period, written responses to those comments, and changes to the Draft EIR. In conformance with CEQA and the CEQA Guidelines, the City of Santa Fe Springs conducted an extensive environmental review of the NWC Telegraph SFS Project, including the following:

- Completion of the NOP, which was released for an initial 30-day public review period from May 13, 2024, through June 12, 2024. The NOP was posted at the Los Angeles County Clerk's office on May 10, 2024, and to the State Clearinghouse (SCH) on May 13, 2024. The notice was mailed to reviewing agencies and to City residents and owners within a 500-foot radius from the Project Site. Copies of the NOP were made available for public review on the City's website at: https://www.santafesprings.gov/departments/planning_and_development_department/planning/environmental_documents.php.
- Completion of a scoping process, in which the public was invited by the City to participate. The scoping meeting for the EIR was held in person by the City of Santa Fe Springs on May 22, 2024, at 5:30 PM at the Santa Fe Springs City Council Chambers, 11710 East Telegraph Road, Santa Fe Springs, California 90670.
- Preparation of a Draft EIR by the City, which was made available for a 45-day public review period from November 27, 2024, to January 13, 2025. The Draft EIR consisted of the analysis of the NWC Telegraph SFS Project and appendices, including the NOP and responses to the NOP. The Notice of Availability (NOA) for the Draft EIR was sent to all property owners and occupants within a 500-foot radius from the Project site, all persons, agencies, and organizations on the interest list interested persons, and posted to the SCH website for distribution to public agencies. The NOA was posted at the City of

Santa Fe Springs, Planning Department, 11710 East Telegraph Road, Santa Fe Springs, California 90670 on November 27, 2024. Copies of the Draft EIR were made available for public review at City of Santa Fe Springs, Planning Department (11710 East Telegraph Road, Santa Fe Springs, California 90670) and it was available for download via the City's website at https://www.santafesprings.gov/departments/planning_and_development_department/planning/environmental_documents.php.

- Preparation of a Final EIR, including the Comments and Responses to Comments on the Draft EIR, occurred in January 2025. The Final EIR/Response to Comments contains comments on the Draft EIR, responses to those comments, revisions to the Draft EIR, and appended documents. The Final EIR Response to Comments was released for a 10-day agency review period prior to certification of the Final EIR on January 28, 2025.
- A Planning Commission hearing was held for the proposed Project. A notice of the Planning Commission hearing for the Project was mailed on January 30, 2025 to all property owners of record within a 500-foot radius from the Project site and all individuals that requested to be notified and posted on the City's website: <https://www.santafesprings.gov> and at the City of Santa Fe Springs, Planning Department, 11710 East Telegraph Road, Santa Fe Springs, California 90670, as required by established public hearing posting procedures.

4.0 CEQA FINDINGS OF INDEPENDENT JUDGEMENT

4.1 INDEPENDENT REVIEW AND ANALYSIS

The Final EIR reflects the City's independent judgment. The City has exercised independent judgment in accordance with Public Resources Code 21082.1(c)(3) in retaining its own environmental consultant in the preparation of the Draft EIR, as well as reviewing, analyzing, and revising material prepared by the consultant.

Having received, reviewed, and considered the information in the Final EIR, as well as any and all other information in the record, the City hereby makes findings pursuant to and in accordance with Sections 21081, 21081.5, and 21081.6 of the Public Resources Code.

5.0 IMPACTS DETERMINED TO BE LESS THAN SIGNIFICANT

Based upon the Initial Study/NOP and a review of the Project by the City, the City determined that the Project would have no impact or a less than significant impact on the following environmental topic areas and that no further, detailed analysis of these topics was required in the EIR:

• Aesthetics	• Land Use and Planning
• Agriculture and Forestry Resources	• Public Services
• Biological Resources	• Recreation
• Cultural Resources	• Wildfire
• Population and Housing	

The evidence in support of the finding that the Project would not have a significant impact on these environmental topic areas and/or sub-issues is set forth in the Draft EIR which is incorporated by reference:

• Air Quality	• Mineral Resources
• Energy	• Noise
• Greenhouse Gas Emissions	• Transportation
• Hazards and Hazardous Materials	• Utilities and Service System

- Hydrology and Water Quality

For those environmental impacts that were analyzed in the Draft EIR, the City determined, based upon the CEQA threshold criteria for significance, that the Project would have no impact or a less-than-significant impact to the following environmental topics discussed below in Section 5.1, and that no mitigation measures were required. This determination is based upon the environmental analysis in the Draft EIR and the comments received on the Draft EIR. The City hereby finds that existing regulatory requirements, policies, and/or Project conditions have been identified and incorporated into the Project which avoids or substantially lessens the potentially significant effect on the environment to a less than significant level. No substantial evidence was submitted to or identified by the City which indicated that the Project would result in a significant impact related to the following.

5.1 AESTHETICS

Impact AE-1 Finding: The Project would not have a substantial adverse effect on a scenic vista (Initial Study page 34). Impacts would be less than significant.

Facts in Support of Finding: The 26.77-acre Project site currently contains one, single-story office building on the western edge of the property and a canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. The Project site is within an urbanized area in the City of Santa Fe Springs where the surrounding area is primarily industrial uses. Existing public vantage points exist along roadways that surround the Project site, which do not contain expansive scenic vistas. The Project would develop two industrial warehouses with a total building area of area of 584,678 SF. The maximum building height for the proposed buildings would be 52 feet and the proposed buildings would be set back from the surrounding parcels. Building 1 would include a 78-foot and three-inch setback from the western property line, a 73-foot setback from the northern property line, and a 73-foot setback from the eastern property line. Building 2 would include a 78-foot and three-inch setback from the western property line, a 31-foot setback from the southern property line, and a 31-foot setback from the eastern property line. The Project would comply with setback standards as required by Section 155.244, Property Development Standards, of the City Municipal Code. Therefore, the proposed Project would not encroach upon views of any scenic vistas for pedestrians and motorists from public vantage points on the nearest roadways including Telegraph Road and Santa Fe Springs Road. Thus, impacts would be less than significant.

Impact AE-2 Finding: The Project would not substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State scenic highway (Initial Study page 34). No impact would occur.

Facts in Support of Finding: According to the California Department of Transportation (Caltrans) Scenic Highway Map, there are no officially designated State scenic highways near the Project site, the closest one being Route 55 which turns into State Route (SR) 91 southeast of Santa Fe Springs, approximately 15.15 miles from the Project site. Therefore, the Project site would not damage scenic resources such as rock outcroppings, historic buildings, or trees within a state scenic highway.

Impact AE-3 Finding: The Project would not conflict with applicable zoning and other regulations governing scenic quality (Initial Study page 35). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project is in an urbanized area and has an existing GP land use designation of Industrial and is zoned as M-2. The proposed Project is a permitted use under the Industrial

land use and M-2 zone. Additionally, the proposed Project would include a new 8-foot-high tube steel fence along the southwestern, western, northern, and northeastern property line, which would connect to existing tube steel fence along the southeastern property line. The truck court would also be secured by a 14-foot-high concrete screen wall with two 10-foot-high tube steel sliding gates on the western side and one 10-foot-high tube steel sliding gate on the eastern side. The proposed fencing would be consistent with the City's development standards, as ensured during the City's plan check. The proposed Project would be consistent with the M-2 zone's development standards including FAR, setbacks, height, and fencing pursuant to Section 155.244, Property Development Standards of the Santa Fe Springs Municipal Code. Therefore, the Project would not conflict with applicable zoning regulations and impacts would be less than significant.

Impact AE-4 Finding: The Project would not create a new source of substantial light or glare that would adversely affect day and nighttime views in the area (Initial Study pages 35-36). Impacts would be less than significant.

Facts in Support of Finding: The Project site is heavily disturbed and contains one, single-story office building on the western edge of the property and a canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. Thus, there is light and glare currently being generated from the site. However, the Project would introduce new sources of light from new building security lighting, streetlights within the Project area, interior lights shining through building windows, and headlights from nighttime vehicular trips generated from the Project. Lighting would also be used during the construction phase for site security. Thus, the Project would increase lighting and glare compared to the existing condition. However, the Project would be subject to Sections 155.432 and 155.496 of the City Municipal Code, which prohibits light and glare to be transmitted or reflected in concentrated quantities that would be detrimental or harmful to the use of surrounding properties or streets. Thus, the proposed Project would have a less than significant impact related to light and glare.

Aesthetics Cumulative Finding: The Project would not result in cumulative impacts to aesthetics.

Facts in Support of Finding: Based on the foregoing discussion under Impacts AE-1 through AE-4, the Project would not result in, or contribute to, a cumulatively significant impact to aesthetics.

5.2 AGRICULTURE AND FORESTRY RESOURCES

Impact AG-1 Finding: The Project would not conflict with existing zoning or a Williamson Act contract (Initial Study page 37). No impact would occur.

Facts in Support of Finding: The Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Department of Conservation. The Project site is identified as "Urban and Built-Up Land" by the California Department of Conservation's Important Farmland Finder. Additionally, the Project site is currently zoned as M-2 which does not allow for agricultural uses. Implementation of the proposed Project would therefore not involve the conversion of any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to urban uses. As a result, no impact would occur.

Impact AG-2 Finding: The Project would not conflict with existing zoning for forest land, timberland, or timberland zoned timberland production (Initial Study page 38). No impact would occur.

Facts in Support of Finding: The Project site is zoned M-2, which does not provide for agricultural uses, and no agriculture uses exist adjacent to the site that would be affected by the Project's implementation. In addition, according to the California Department of Conservation's Williamson Act Enrollment Finder, the Project site is not under a Williamson Act Contract. Therefore, development of the proposed Project would

not conflict with an existing Williamson Act contract or existing zoning for agricultural use. As a result, no impact would occur.

Impact AG-3 Finding: The Project would not result in the loss or conversion of forest land (Initial Study page 38). No impact would occur.

Facts in Support of Finding: The Project site is designated M-2, and is not zoned for forest land, timberland, or Timberland Preserve Zone (TPZ). Additionally, there are no forest lands, timberland, or zoned Timberland Production in proximity to the Project site. Therefore, the proposed Project would not result in impacts to forest land, timberland, or TPZ.

Impact AG-4 Finding: The Project would not result in the loss of forest land or conversion of forest land to non-forest use (Initial Study page 38). No impact would occur.

Facts in Support of Finding: The Project site is mostly barren with some ornamental trees and shrubs that would not qualify as forest land. In addition, the Project site is zoned M-2, and no forest land exists adjacent to the Project site. Therefore, the proposed Project would not result in the loss or conversion of forest land to non-forest use.

Impact AG-5 Finding: The Project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agriculture use or conversion of forest land to non-forest use (Initial Study page 38). No impact would occur.

Facts in Support of Finding: The Project site is heavily disturbed and contains one single-story office building on the western edge of the property and a canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. There are no agricultural activities on or adjacent to the Project site. Additionally, neither the Project site nor the surrounding area are designated as forest land or farmland. Thus, the proposed Project would not convert existing farmland to non-agricultural uses, nor convert forest land to non-forest uses. Therefore, no impact would occur.

Agriculture and Forestry Resources Cumulative Finding: The Project would not result in cumulative impacts to agriculture and forest resources.

Facts in Support of Finding: Based on the foregoing discussion under Impacts AG-1 through AG-5, the Project would not result in, or contribute to, a cumulatively significant impact to agriculture and forestry Resources.

5.3 AIR QUALITY

Impact AQ-3 Finding: The Project would not expose sensitive receptors to substantial pollutant concentrations (DEIR pages 5.1-27 – 5.1-36).

Facts in Support of Finding:

CO Hotspots. An adverse CO concentration, known as a “hot spot,” would occur if an exceedance of the State’s one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur. The 2003 AQMP estimated traffic volumes that could generate CO concentrations to result in a “hot spot”. As shown in DEIR Table 5.1-13, the busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vehicles per hour (vph) and the 1-hour

concentration for this intersection was 4.6 ppm; this indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day, CO concentrations ($4.6 \text{ ppm} \times 4 = 18.4 \text{ ppm}$) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm)

As summarized in DEIR Table 5.1-13, the busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vehicles per hour (vph) and AM/PM traffic volumes of 8,062 vph and 7,719 vph respectively. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm; this indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day, CO concentrations ($4.6 \text{ ppm} \times 4 = 18.4 \text{ ppm}$) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm). Operation of the proposed Project at buildout would result in 1,394 daily weekday trips; of these, 130 would occur during AM peak hour and a total of 138 new trips in the PM peak hour through area intersections. These trips would be distributed throughout the vicinity of the Project and would not result in daily traffic volumes of 100,000 vehicles per day or more. As such, Project-related traffic volumes are less than the traffic volumes identified in the 2003 AQMP, and are not high enough to generate a CO “hot spot”. Therefore, impacts related to CO “hot spots” from operation of the proposed Project would be less than significant.

Friant Ranch Case. For extremely large regional projects (unlike the proposed Project), the SCAQMD states that it has been able to correlate potential health outcomes for very large emissions sources – as part of their rulemaking activity, specifically 6,620 lbs./day of NOX and 89,180 lbs./day of ROG were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to O3. The proposed Project does not generate anywhere near 6,620 lbs./day of NOX or 89,190 lbs./day of ROG emissions. As shown in DEIR Tables 5.1-8 and 5.1-10, the Project would generate up to 53.8 lbs./day of NOX during construction and 54.0 lbs./day of NOX during operations (0.8 percent of 6,620 lbs./day for both). The ROG emissions would be a maximum of 69.8 lbs./day during construction with mitigation and 24 lbs./day of during operations (0.08 percent and 0.03 of 89,190 lbs./day). Therefore, the emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level and further, would not exceed applicable SCAQMD’s applicable LST thresholds.

Diesel Mobile Source Health Risk. A Health Risk Assessment, included as Appendix C of the DEIR, was prepared to evaluate the health risk impacts as a result of heavy-duty diesel trucks traveling to and from the site, maneuvering on-site, and entering and leaving the site during construction and operation of the proposed Project.

Construction: The land use with the greatest potential exposure to Project construction-source DPM emissions is a residential apartment community that is 357 feet south of the Project site boundary, while the nearest worker receptor was located at a manufacturing building 6 feet to the east of the Project boundary. As shown in DEIR Table 5.1-14, at the maximum individual cancer risk (MICR) attributable to Project construction-source DPM emissions is estimated at 0.85 in one million, which is less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be 0.02, which would not exceed the applicable threshold of 1.0. The location analyzed is the nearest receptor to the Project site and would experience the highest concentrations of DPM during Project construction due to meteorological conditions at the site. Because all other receptors would experience lower concentrations of DPM during Project construction, all other receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIR (maximally exposed individual resident) identified herein. As such, the Project will not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction activity. All other receptors during construction activity would experience less risk than what is identified for this location. As such, construction of the Project would not cause a significant human health or cancer risk to nearby residences and impacts would be less than significant.

Operation: The land use with the greatest potential exposure to Project construction-source DPM emissions is a residential apartment community that is 357 feet (109 meters) south of the Project site boundary, while the nearest worker receptor was located at a manufacturing building 1.91 meters (6 feet) to the east of the Project boundary. As shown in DEIR Table 5.1-15, the MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.49 in one million, which is less than the SCAQMD significance threshold of 10 in one million. The non-cancer risks were estimated to be 0.12, which would not exceed the applicable significance threshold of 1.0. All other receptors would experience lower concentrations of DPM and thus less risk during operation of the proposed Project than the MEIR identified herein. As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project operational activity. Impacts would be less than significant.

School Child Exposure. There are no schools within one-quarter mile of the Project site. The nearest schools are Rancho Santa Gertrudes Elementary School, located at 11233 Charlesworth Road, approximately 1.2 miles from the Project site; and Jersey Avenue Elementary School, located at 9400 Jersey Ave, approximately 1.4 miles from the Project site. Because there is no reasonable potential that TAC emissions would cause significant health impacts at distances of more than $\frac{1}{4}$ mile from the air pollution source, there would be no significant impacts that would occur to any schools in the vicinity of the Project.

Impact AQ-4 Finding: The Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people (DEIR page 5.1-36). Impacts would be less than significant.

Facts in Support of Finding: Odors generated by the operation of the proposed Project are not expected to be significant or highly objectionable and would be required to be in compliance with SCAQMD Rule 402, which would prevent nuisances to sensitive land uses. During construction, emissions from construction equipment, architectural coatings, and paving activities may generate odors. However, these odors would be temporary, intermittent in nature, and would not affect a substantial number of people. The noxious odors would be confined to the immediate vicinity of the construction equipment. Also, the short-term construction-related odors would cease upon the drying or hardening of the odor-producing materials.

In addition, all Project-generated solid waste would be stored in covered containers and removed at regular intervals in compliance with solid waste regulations and would not generate objectionable odors. Therefore, impacts associated with other operation- and construction-generated emissions, such as odors, would be less than significant.

Plans, Programs, and Policies

PPP AQ-4: Rule 402. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 402. The Project shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

5.4 BIOLOGICAL RESOURCES

Impact BIO-1 Finding: The Project would not have an adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (Initial Study page 40). Impacts would be less than significant.

Facts in Support of Finding:*Special Status Plant Species*

As shown in Initial Study Table 5-1, a total of 33 sensitive plant species were found to have the potential to occur on or within the vicinity of the Project site. Of those 33 sensitive plant species, a total of 13 of the reviewed sensitive plant species are listed as State and/or federal Threatened, Endangered, or Candidate species; or have a rare plant ranking of 1B.1 on the CNPS Rare Plant Inventory. However, no sensitive plant species were found to be present on the Project site nor to have suitable habitat present on the Project site. Therefore, implementation of the Project would have a less than significant impact on sensitive plant species.

Special Status Animal Species

As shown in Initial Study Table 5-2, of the 48 special-status wildlife species, 17 are listed as State and/or federal Threatened, Endangered, or Candidate. The field survey did not identify suitable habitat for any of the animal species mentioned below, including any suitable habitat for burrowing owl. Therefore, implementation of the Project would have a less than significant impact on sensitive wildlife species.

Impact BIO-2 Finding: The Project would not have an adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (Initial Study page 44). No impact would occur.

Facts in Support of Finding: As described in the General Biological Assessment, the Project site does not contain or support any streams, drainages or riparian habitats. Thus, no impacts related to riparian habitat or other sensitive natural communities identified in local or regional plans would result from Project implementation.

Impact BIO-3 Finding: The Project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means (Initial Study page 44). No impact would occur.

Facts in Support of Finding: As described in the General Biological Assessment, the Project site does not contain natural wetlands. Therefore, the Project would not result in impacts to wetlands.

Impact BIO-4 Finding: The Project would not 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 (Initial Study page 44). Impacts would be less than significant.

Facts in Support of Finding: Wildlife corridors are areas where wildlife movement is concentrated due to natural or anthropogenic constraints and corridors provide access to resources such as food, water, and shelter. Animals use these corridors to move between different habitats and provide avenues for wildlife dispersal, migration, and contact between other populations. The Project site is heavily disturbed and contains one, single-story office building on the western edge of the property and a canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. The Project site is also located in an urban area and is surrounded by developed land uses. Further, no wildlife movement corridors were found to be present on the Project site nor does the Project site support conditions for migratory wildlife corridors or linkages. There are no rivers, creeks, or open drainages near the site that could function as a wildlife corridor. Thus, implementation of the Project would not result in impacts related to wildlife movement or wildlife corridors.

While the Project site contains shrubs and some trees that could be used for nesting by common bird species that are protected by the federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code Sections 3503.5, 3511, and 3515 during the avian nesting and breeding season that occurs between February 1 and September 15, the provisions of the MBTA prohibit disturbing or destroying active nests as described in PPP BIO-1. With compliance of regulatory requirements, potential impacts to nesting birds would be less than significant.

Plans, Programs, and Policies

PPP BIO-1: Migratory Bird Treaty Act. Vegetation removal should occur outside of the nesting bird season (generally between February 1 and September 15). If vegetation removal is required during the nesting bird season, the applicant must conduct take avoidance surveys for nesting birds prior to initiating vegetation removal/clearing. Surveys will be conducted by a qualified biologist(s) within three days of vegetation removal. If active nests are observed, a qualified biologist will determine appropriate minimum disturbance buffers and other adaptive mitigation techniques (e.g., biological monitoring of active nests during construction-related activities, staggered schedules, etc.) to ensure that impacts to nesting birds are avoided until the nest is no longer active. At a minimum, construction activities will stay outside of a 200-foot buffer around the active nests. The approved buffer zone shall be marked in the field with construction fencing and shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests.

Impact BIO-5 Finding: The Project would not conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (Initial Study page 45). Impacts would be less than significant.

Facts in Support of Finding: Implementation of the Project is subject to all applicable federal, State, and local policies and regulations related to the protection of biological resources and tree preservation. Thus, the Project would be required to comply with the City of Santa Fe Springs Tree Ordinance, as listed in Title IX, Chapter 95, Section 130-140 of the City Municipal Code which states that trees, shrubs or plants along any street shall not be interfered with without a permit from the City. However, the Project site would not impact any trees on an existing City roadway. The Project site is surrounded by other existing uses and does not directly border a public roadway including Santa Fe Springs Road and Telegraph Road; therefore, the Project would not be subject to the City of Santa Fe Springs' tree ordinance. Implementation of the proposed Project would not conflict with any local policies or ordinances protecting biological resources; therefore, the Project would have a less than significant impact on local tree policies.

Impact BIO-6 Finding: The Project would not conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan (Initial Study page 45). No impact would occur.

Facts in Support of Finding: The Project site is located in an urban area and is not within the boundary of an adopted HCP, NCCP or other approved local, regional, or State habitat conservation plan. As such, the proposed Project would not conflict with the provisions of any such plans and no impacts would occur.

Biological Resources Cumulative Finding: The Project would not result in cumulative impacts to biological resources.

Facts in Support of Finding: Based on the foregoing discussion under Impacts BIO-1 through BIO-6, the Project would not result in, or contribute to, a cumulatively significant impact to biological resources.

5.5 CULTURAL RESOURCES

Impact CUL-1 Finding: The Project would not cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 (Initial Study page 46).

Facts in Support of Finding: The Project site is heavily disturbed and contains one, single-story office building on the western edge of the property and a canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. The Phase I Cultural Resources Assessment (Appendix B) prepared by BFSa determined that none of the features identified on the Project site appear to be older than 50 years and the six oil pump jacks do not correspond with the historic extraction of oil on the property. As such, there are no existing historical resources within the Project site or within the immediate vicinity of the Project, and impacts related to historic resources would not occur from implementation of the Project.

Impact CUL-2 Finding: The Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5 (Initial Study page 46). Impacts would be less than significant.

Facts in Support of Finding: The Project site is currently heavily disturbed. Project construction would require excavation at depths of approximately seven feet. As part of the Phase I Cultural Resources Assessment, an archaeological records search for the Project site and surrounding area was conducted through the South Central Coastal Informational Center at California State University Fullerton. The records search indicated that 35 previous studies have been conducted within a mile of the Project site and 12 resources have been identified within a mile of the Project site, however, no resources have been recorded within the boundaries of the Project site or immediate vicinity. Additionally, no cultural resources were identified within the Project site. Thus, the potential to encounter unknown archeological resources was determined to be minimal. However, in the event that any historic or prehistoric cultural resources are inadvertently discovered, all construction work in the immediate vicinity of the discovery shall stop and a qualified archaeologist shall be engaged to evaluate the discovery pursuant to PPP CUL-2. With compliance of regulatory requirements, impacts related to archaeological resources would be less than significant.

Impact CUL-3 Finding: The Project would not disturb any human remains, including those interred outside of formal cemeteries. (Initial Study page 47).

Facts in Support of Finding: The Project site has been heavily disturbed, as described above, and has not been previously used as a cemetery. It is not anticipated that implementation of the proposed Project would result in the disturbance of human remains. Existing regulation under the California Health and Safety Code, included as PPP CUL-1, outlines the procedures to undertake if human remains are found on the Project site. In the event of inadvertent discovery of human remains during Project construction, the State Health and Safety Code Section 7050.5 states that no further disturbance may occur in the vicinity of the body until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. Compliance with existing regulations would ensure impacts related to potential disturbance of human remains would be less than significant.

Cultural Resources Cumulative Finding: The Project would not result in cumulative impacts to cultural resources.

Facts in Support of Finding: Based on the foregoing discussion under Impacts CUL-1 through CUL-3, the Project would not result in, or contribute to, a cumulatively significant impact to cultural resources.

Plans, Programs, and Policies

PPP CUL-1: Human Remains. Should human remains be discovered during Project construction, the Project will be required to comply with State Health and Safety Code Section 7050.5, which states that no further disturbance may occur in the vicinity of the body until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine the identity of and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD must complete the inspection within 48 hours of notification by the NAHC.

PPP CUL-2: Inadvertent Discovery. In the event that potential archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the City or County List of Qualified Archaeologists has evaluated the find to determine whether the find constitutes a “unique archaeological resource,” as defined in Section 21083.2(g) of the California Public Resources Code. Any resources identified shall be treated in accordance with California Public Resources Code Section 21083.2(g).

If the discovered resource(s) appears Native American in origin, a Native American Monitor shall be contacted to evaluate any potential tribal cultural resource(s) and shall have the opportunity to consult on appropriate treatment and curation of these resources. The discovery would also be reported to the City and the South Central Coastal Information Center (SCCIC).

Prior to the issuance of any permits for ground-disturbing activities that include the excavation of soils (including as grading, excavation, and trenching), the City shall ensure that all Project grading and construction plans and specifications include requirement to halt construction activity and contact an archaeologist as specified above.

Impacts to Cultural Resources are typically site-specific and limited to the geographic boundaries of the individual project site; based on the foregoing, the Project will not result in, or contribute to, a cumulatively significant impact to Cultural Resources.

5.6 ENERGY

Impact Finding: The Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation (DEIR page 5.2-6). Impacts would be less than significant.

Facts in Support of Finding:

Construction. Construction activities related to the proposed Project and the associated infrastructure are not expected to result in demand for fuel greater on a per-unit-of-development basis than other development projects in Southern California. Also, CCR Title 13, Motor Vehicles, Section 2449(d)(3), Idling, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. The energy analysis modeling for the proposed Project shows that construction-related use of construction vehicles and off-road equipment would utilize approximately 132,422 gallons of diesel fuel and 35,613 gallons of gasoline, as described in

DEIR Appendix B. Construction activities would require limited energy consumption, would comply with all existing regulations, and would therefore not be expected to use large amounts of energy or fuel in a wasteful manner. Thus, impacts related to construction energy usage would be less than significant.

Operation. Once operational, the Project building would generate demand for electricity, natural gas, and petroleum (gasoline and diesel) for motor vehicle trips. Operational use of energy includes the fuel used for vehicle trips associated with the Project, heating, cooling, and lighting of buildings, water heating, operation of electrical systems and plug-in appliances within buildings, parking lot and outdoor lighting, and the transport of electricity and water to areas where they would be consumed. The proposed Project includes the operation of two emergency generators and two fire pumps, that are assumed to operate for one hour per day for a total of 50 hours per year. In addition, 58 forklifts are assumed, inclusive of 29 compressed natural gas (CNG) and 29 electric forklifts. This use of energy is typical for urban development, and no operational activities or land uses would occur that would result in extraordinary energy consumption.

As detailed in DEIR Table 5.2-2, operation of the Project is estimated to annually use 117,414 gallons of gasoline and 579,305 gallons of diesel fuel. In addition, the proposed Project is estimated to annually use 129.73 therms of natural gas. Total natural gas consumption in Los Angeles County in 2021 was 2,880 million therms (2,880,994,891 therms). Therefore, operation of the proposed Project would increase the annual natural gas consumption in Los Angeles County by approximately 0.000005 percent. As shown in Table 5.5-2, the estimated electricity demand associated with the operation of the proposed Project is 4,588,249 kWh per year. Total electricity consumption in Los Angeles County in 2021 was 65,374.7 GWh (65,374,721,369 kWh). Therefore, operation of the proposed Project would increase the annual electricity consumption in Los Angeles County by approximately 0.007 percent. Overall, the Project's estimate fuel and energy use is typical for urban development. As such, no operational activities or land uses would occur that would result in extraordinary energy consumption. Additionally, through City permitting, assurance would be provided that existing regulations related to energy efficiency and consumption, such as Title 24 regulations and CCR Title 13, Motor Vehicles, Section 2449(d)(3) related to idling, would be implemented. The Project would not preclude renewable energy use because buildings would be solar ready in compliance with current Title 24 requirements, which would allow for the future installation of rooftop solar. Therefore, the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during operation.

Impact E-2 Finding: The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency (DEIR page 5.2-8). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of the proposed Project. Typical Title 24 measures include insulation, use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC), solar-reflective roofing materials, energy-efficient indoor and outdoor lighting systems, reclamation of heat rejection from refrigeration equipment to generate hot water, and incorporation of skylights. The City's administration of the CCR Title 24 requirements includes review of design components and energy conservation measures and occurs during the permitting process, which ensures that all requirements are met. In addition, Project design and operation would comply with State Building Energy Efficiency Standards, appliance efficiency regulations, and green building standards. The Project buildings would be solar ready in compliance with current Title 24 requirements, which would allow for the future installation of rooftop solar. As a result, the proposed Project would not conflict with or obstruct with CCR Title 24 energy efficiency standards. Because the proposed Project's total impact on regional energy supplies would be minor, the proposed Project would not conflict with or obstruct California's energy conservation plans as described in the CEC's Integrated Energy Policy Report. Further, as shown in DEIR Table 5.2-3, the proposed Project would be consistent with the General Plan Conservation Element policies related to energy and energy consumption that are applicable to the Project.

Energy Cumulative Finding: The Project would not result in cumulative energy consumption which would be cumulatively wasteful, inefficient, or unnecessary (DEIR page 5.2-10). Impacts would be less than significant.

Facts in Support of Finding: The geographic context for analysis of cumulative impacts regarding energy includes past, present, and future development within the County of Los Angeles. All development projects throughout the County would be required to comply with the energy efficiency standards in the Title 24 requirements. Additionally, some of the developments could provide for additional reductions in energy consumption by use of solar panels, sky lights, or other LEED-type energy efficiency infrastructure. With implementation of the existing energy conservation regulations, the electricity and fuel consumption from the proposed Project would not be cumulatively wasteful, inefficient, or unnecessary.

Petroleum consumption associated with the proposed Project and cumulative development projects would be primarily attributable to transportation, especially vehicular and truck use. However, State fuel efficiency standards and alternative fuels policies (per AB 1007 Pavley (2005)) would contribute to a reduction in fuel use, and the federal Energy Independence and Security Act and the State's Long Term Energy Efficiency Strategic Plan would reduce reliance on non-renewable energy resources. In addition, CCR Title 13, Motor Vehicles, Section 2449(d)(3) limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. For these reasons, the consumption of petroleum would not occur in a wasteful, inefficient, or unnecessary manner and impacts would be less than cumulatively considerable.

5.7 GEOLOGY AND SOILS

Impact GEO-1i Finding: The Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving 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 of based on other substantial evidence of a known fault (Initial Study pages 49-50). No impact would occur.

Facts in Support of Finding: The Project site is not located within an Alquist-Priolo Earthquake Fault zone. The closest Alquist-Priolo Earthquake Fault zones are the Elsinore fault zone, located approximately 5.5 miles northeast and the East Montebello Fault Zone, located approximately 7 miles north from the Project site, respectively. Due to the distance of the Project site from the closest fault zone, there is no potential for the Project to be subject to rupture of a known earthquake fault. Impacts related to a fault zone would not occur from implementation of the proposed Project.

Impact GEO-1ii Finding: The Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking (Initial Study pages 50). Impacts would be less than significant.

Facts in Support of Finding: The closest active fault zones to the Project site are the Elsinore fault zone, located approximately 5.5 miles northeast and the East Montebello Fault Zone, located approximately 7 miles north from the Project site, respectively. A major earthquake along these faults or another regional fault could cause substantial seismic ground shaking at the site. However, structures built in the City are required to be built in compliance with the California Building Code (CBC) (California Code of Regulations, Title 24, Part 2) that provides provisions for earthquake safety based on factors including building occupancy type, the types of soils onsite, and the probable strength of ground motion. Pursuant to Title 15, Chapter 150, Building Regulations, of the Santa Fe Springs Municipal Code, the Project would incorporate the design recommendations included in the geotechnical report, which will be subject to review and approval by City staff prior to issuance of a grading permit. Compliance with the CBC as verified by the City's review process and included as a condition of approval, would reduce impacts related to strong seismic ground shaking to a less than significant level.

Impact GEO-1iii Finding: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction (Initial Study pages 50-51). Impacts would be less than significant.

Facts in Support of Finding: According to Figure S-1, *Seismic Hazards*, of the Santa Fe Springs General Plan Safety Element, the Project site is not identified as being within a liquefaction zone. Additionally, compliance with the CBC, ensured through the City's plan check, would reduce impacts related to seismic-related ground failure to a less than significant level. Therefore, impacts related to seismic-related ground failure would be less than significant impact.

Impact GEO-1iv Finding: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides (Initial Study page 51). Impacts would be less than significant.

Facts in Support of Finding: The Geotechnical Investigation prepared for the site found that the onsite soils of the Project site consist of medium dense to very dense sands and silty sands and stiff to very stiff sandy silts and clays. Based on preliminary field investigation and laboratory testing, on-site soils possess a "very low" expansion potential. In addition, compliance with the CBC would require specific engineering design recommendations be incorporated into grading plans and building specifications as a condition of construction permit approval to ensure that Project structures would withstand effects related to ground movement, including expansive soils. Therefore, impacts would be less than significant.

Impact GEO-2 Finding: The Project would not result in substantial soil erosion or the loss of topsoil (Initial Study page 51). Impacts would be less than significant.

Facts in Support of Finding: Construction of the proposed Project has the potential to contribute to soil erosion and the loss of topsoil. Grading activities that would be required for the Project would expose and loosen topsoil, which could be eroded by wind or water. To reduce the potential for soil erosion and the loss of topsoil, construction activities would require a SWPPP, which is mandated by the National Pollution Discharge Elimination System (NPDES) General Construction Permit (included as PPP HYD-1) and enforced by the Los Angeles RWQCB. The SWPPP is required to address site-specific conditions related to specific grading and construction activities that could cause erosion and the loss of topsoil and provide erosion control BMPs to reduce or eliminate the erosion and loss of topsoil. Compliance with State and federal requirements would ensure that the proposed Project would have a less than significant impact related to soil erosion or loss of topsoil.

Additionally, the proposed Project includes installation of landscaping adjacent to the proposed buildings and throughout the proposed parking areas. With this landscaping, areas of loose topsoil that could erode by wind or water would not exist upon operation of the proposed Project. Thus, with implementation of existing requirements, impacts related to substantial soil erosion or loss of topsoil would be less than significant.

Plans, Programs, and Policies

PPP WQ-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Building and Safety Department evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resources Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and

implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

Impact GEO-3 Finding: The Project would not 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 offsite landslide, lateral spreading, subsidence, liquefaction or collapse (Initial Study page 51). Impacts would be less than significant.

Facts in Support of Finding: The Project site is not located in an area that is susceptible to landslides or liquefaction. Due to the depth of groundwater and the low susceptibility to liquefaction, the potential for lateral spreading is considered low. According to the Geotechnical Investigation, groundwater was not encountered to the maximum explored depth of approximately 51.5 feet below existing grade. In addition, the Project would not pump water from the Project area, however, slight subsidence is anticipated as a result of soil excavation and compaction. Thus, impacts related to subsidence would be less than significant.

Compliance with the requirements of the CBC and related recommendations in the Geotechnical Investigation related to compaction of soils and development of foundations is required as part of the building plan check and development permitting process, and would reduce potential impacts related to lateral spreading, liquefaction, subsidence, and ground collapse to a less than significant level.

Impact GEO-4 Finding: The Project would not be located on expansive soils, as defined in Table 18-1-B of the Uniform Building Code (1994) and would not create substantial risks to life or property (Initial Study page 52). Impacts would be less than significant.

Facts in Support of Finding: The Geotechnical Investigation prepared for the Project found that onsite soils consist of medium dense to very dense sands and silty sands and stiff to very stiff sandy silts and clays. Based on preliminary field investigation and laboratory testing, on-site soils possess a “very low” expansion potential. In addition, compliance with the CBC would require specific engineering design recommendations be incorporated into grading plans and building specifications as a condition of construction permit approval to ensure that Project structures would withstand effects related to ground movement, including expansive soils. Therefore, impacts would be less than significant.

Impact GEO-5 Finding: The Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater (Initial Study page 52). No impact would occur.

Facts in Support of Finding: The proposed Project would be served by the City sewer utilities and would not include the use of septic tanks or alternative wastewater disposal systems. Implementation of the Project would not result in impacts related to these systems.

5.8 GREENHOUSE GAS EMISSIONS

Impact Finding: The Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases (Draft EIR page 5.4-11). Impacts would be less than significant.

Facts in Support of Finding: Implementation of the proposed Project would generate GHG emissions from well closure activities, construction activities, haul trips, vendor trips, and construction worker vehicle trips. As shown in DEIR Table 5.4-1, the Project would emit a total of 2,119 Annual MTCO_{2e} over the duration of construction, with 2025 having the highest emission level (1,125 MTCO_{2e}). Amortized over 30 years, the Project’s construction emissions would be approximately 71 MTCO_{2e} per year.

Long-term operations of uses proposed by the Project would also generate GHG emissions from Area Source Emissions, Energy Source Emissions, Mobile Source Emissions, On-Site Cargo Handling Equipment Emissions, Stationary Source Emissions, Water Supply, Treatment, and Distribution, Solid Waste. However, the Air Quality, Energy, and GHG Impact Analysis prepared for the proposed Project describes that the GHG emissions generated from the proposed Project at buildout are primarily associated with non-construction related mobile sources, such as vehicle and truck trips. The annual GHG emissions associated with the proposed Project are summarized in DEIR Table 5.4-2. As shown, construction and operation of the Project would generate a net total of approximately 9,006 MTCO₂e per year, which would not exceed the screening threshold of 10,000 MTCO₂e per year.

As Project-related GHG emissions would not exceed the 10,000 MTCO₂e/year threshold, impacts would be less than significant.

Impact GHG-2 Finding: The Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs (DEIR page 5.4-13-5.4-18). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project would not interfere with the State's implementation of AB 1279's target of 85 percent below 1990 levels and carbon neutrality by 2045 because it does not interfere with implementation of the GHG reduction measures listed in CARB's Updated Scoping Plan (2022). Further, the Project's consistency with the 2022 Scoping Plan also satisfies consistency with AB 32 since the 2022 Scoping Plan is based on the overall targets established by AB 32 and SB 32. Thus, the Project would be consistent with the State's requirements for GHG reductions as shown in DEIR Table 5.4-3. In addition, as detailed in DEIR Table 5.4-4, the Project would not conflict with the relevant General Plan goals and policies related to GHG emissions. Overall, the Proposed Project would conform to state and local GHG emissions reduction and climate change regulations, policies, and strategies.

Greenhouse Gas Emissions Cumulative Finding: The Project would not result in cumulative impacts related to GHG emissions (DEIR page 5.4.19). Impacts would be less than significant.

Facts in Support of Finding: GHG emissions impacts are assessed in a cumulative context, since no single project can cause a discernible change to climate. Therefore, the area in which a proposed project in combination with other past, present, or future projects, could contribute to a significant cumulative climate change impact would not be defined by a geographical boundary such as a project site or combination of sites, city, or air basin. GHG emissions have high atmospheric lifetimes and can travel across the globe over a period of 50 to 100 years or more. Even though the emissions of GHGs cannot be defined by a geographic boundary and are effectively part of the global issue of climate change, CEQA places a boundary for the analysis of impacts at the State's borders. Thus, the geographic area for analysis of cumulative GHG emissions impacts is the State of California.

The analysis of GHG emission impacts under CEQA contained in the DEIR effectively constitutes an analysis of the Project's contribution to the cumulative impact of GHG emissions. The estimated GHG emissions from development and operation of the Project would not exceed SCAQMD thresholds and the proposed Project would be consistent with relevant plans, policies, and programs adopted for the purpose of reducing the emissions of GHGs. Therefore, the Project would not result in cumulatively considerable GHG impacts and cumulative GHG impacts would be less than significant.

5.9 HAZARDS AND HAZARDOUS MATERIALS

Impact HAZ-3 Finding: The Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school (DEIR page 5.5-21). Impacts would be less than significant.

Facts in Support of Finding: The Project site is not located within 0.25-mile from an existing or proposed school. The closest school to the Project site is the Rancho Santa Gertrudes Elementary School located 1.2 miles from the Project site. Therefore, impacts would be less than significant.

Impact HAZ-4 Finding: The Project would not be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would not create a significant hazard to the public or the environment (DEIR page 5.5-21). Impacts would be less than significant.

Facts in Support of Finding: The Phase I Environmental Site Assessment that was conducted included database searches, including the SWRCB GeoTracker website or the DTSC EnviroStor websites, to determine if the Project site is identified as a hazardous materials site. The record searches determined that although the site has a history of various uses and identified as previously generating hazardous wastes and is within an area overlying Superfund site clean-up activities, the Project site is not included on a Cortese List of hazardous materials sites pursuant to Government Code Section 65962.5.

Also, although offsite sources of contamination, such as oil wells, chemicals from previous industrial uses, and contaminated soils, were identified, no adjacent sites were identified that are included on a Cortese List of hazardous materials sites compiled pursuant to Government Code Section 65962.5 that could result in impacts related to the proposed Project. As a result, impacts from implementation of the proposed Project related to hazards from being located on or adjacent to a hazardous materials site included on a Cortese List would be less than significant.

Impact HAZ-5 Finding: The Project would not result in a safety hazard or excessive noise for people residing or working in the Project area for a project area for a project located within an airport land use plan or, where such a plan has not been adopted, be within two miles of a public airport or public use airport (DEIR page 5.5-21). No impact would occur.

Facts in Support of Finding: The Fullerton Airport is located approximately 10.6 miles southeast of the City and El Monte Airport is located approximately 13.9 miles north of the center of the City. The Project site does not fall within the Planning Boundary/Airport Influence Area for either airport, and the site is not within a noise contour or safety hazard area related to an airport. Therefore, no impacts related to airport safety hazards would occur.

Impact HAZ-6 Finding: The Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan (Draft EIR page 5.5-21). No impact would occur.

Facts in Support of Finding:

Construction. The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site, and would not restrict access of emergency vehicles to the Project site or adjacent areas. The installation of the new driveway and connections to infrastructure systems that would be implemented during construction of the proposed Project would not require closure of Hawkins Street or adjacent areas. Any temporary lane closures needed for utility connections or driveway construction would be required to implement appropriate measures to facilitate vehicle circulation, as included within construction permits. Thus, implementation of the Project through the City's permitting process would ensure existing regulations are adhered to and that construction-related emergency access or evacuation impacts would not occur.

Operation. Direct access to the Project site would be provided by the proposed driveway at the end of Hawkins Street. The Project driveway and internal circulation would be required through the City's permitting procedures to meet the City's design standards to ensure adequate emergency access and evacuation. The Project is also required to provide fire suppression facilities (e.g., hydrants and sprinklers) in conformance with City Fire Department standards. The City's Building Department would review the development plans prior to approval to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). Therefore, operation of the proposed Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan.

Impact HAZ-7 Finding: The Project would not 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 (DEIR page 5.5-22). No impact would occur.

Facts in Support of Finding: According to CAL FIRE's Fire Hazard Severity Zone Maps, the City is not located in an area of high fire threat. Because Santa Fe Springs is an urbanized community, structural fires rather than wildland fires represent the greatest fire risk. The proposed Project is within an urban area that is adjacent to existing industrial uses and would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. In addition, the proposed Project would be constructed in compliance with the California Fire Code and California Building Code. The safety measures under the California Fire Code include ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system, and sealing any gaps around doors, windows, eaves, and vents to prevent intrusion by flame or embers. The California Building Code requirements include CCR Title 24, Part 2, which provides specific requirements related to exterior fire exposure. Compliance with existing regulatory requirements for implementation of fire protection measures (e.g., ignition-resistant construction materials and measures) would further reduce impacts associated with fire spread. Thus, the proposed Project would not result in a significant impact related to exposure of people or structures to significant risk involving wildland fires.

Hazards and Hazardous Materials Cumulative Impact Finding: The Project would not result in cumulative impacts related to hazards or hazardous materials (DEIR page 5.5-22-5.5-23). Impacts would be less than significant.

Facts in Support of Finding: Cumulative land use changes within the City of Santa Fe Springs would have the potential to expose future area residents, employees, and visitors to chemical hazards through redevelopment of sites and structures that may contain hazardous materials. Thus, the proposed Project's contribution to cumulative impacts to hazards and hazardous materials was analyzed in context with past and foreseeably future projects in the City that are similarly affected by hazardous soil, VOCs, and methane gas conditions.

The severity of potential hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. As shown in DEIR Figure 5-1, the closest cumulative project is adjacent to the Project site.

The commencement of construction of the adjacent cumulative project is unknown; however, it is possible that construction activities involving hazardous materials from both the proposed Project and the adjacent cumulative project or other nearby cumulative projects would occur simultaneously that could have the potential to cumulatively contribute to an impact. However, all hazardous materials users and transporters, as well as hazardous waste generators and disposers are subject to regulations that require proper

transport, handling, use, storage, and disposal of such materials to ensure public safety, which are verified by the City during the construction and development permitting process.

Thus, if hazardous materials are found to be present on any of the cumulative or future project sites, appropriate remediation activities would be required pursuant to standard federal, State, and regional regulations that would reduce potential impacts, such as the activities which would be done by the proposed Project. In addition, compliance with SCAQMD Rule 1166 and OSHA Safety and Health standards would be implemented for the proposed Project to ensure that hazardous soil from the site would be handled and disposed of in a manner which would reduce the potential of the proposed Project to result in a hazard to the public or environment that could cumulatively combine. As such, the potential impacts from the proposed Project would not be cumulatively considerable.

5.10 HYDROLOGY AND WATER QUALITY

Impact HYD-1 Finding: The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality (DEIR page 5.6-10). Impacts would be less than significant.

Facts in Support of Finding:

Construction. Pollutants of concern during construction activities generally include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. In addition, chemicals, liquid products, petroleum products (such as paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction, which would have the potential to be transported via storm runoff into nearby receiving waters and eventually may affect surface or groundwater quality. During construction activities, excavated soil would be exposed, thereby increasing the potential for soil erosion and sedimentation to occur compared to existing conditions. In addition, during construction, vehicles and equipment are prone to tracking soil and/or spoil from work areas to paved roadways, which is another form of erosion that could affect water quality.

However, pursuant to Santa Fe Springs Municipal Code Section 52.18, each discharger associated with industrial/commercial activity or construction activity shall comply with all requirements of the NPDES permit, as may be issued by the USEPA, the SWRCB, or the RWQCB, and the City's development construction program. Construction activity resulting in a land disturbance of one acre or more, or less than one acre but part of a larger common plan of development or sale, must obtain coverage under the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (CGP). The existing NPDES Construction General Permit requires preparation and implementation of a SWPPP by a Qualified SWPPP Developer (QSD) for construction activities that disturb one acre or more of soil, as included in PPP HYD-1. The SWPPP is required to address site-specific conditions related to potential sources of sedimentation and erosion and would list the required BMPs that are necessary to reduce or eliminate the potential of erosion or alteration of a drainage pattern during construction activities. Compliance with the Construction General Permit and a SWPPP prepared by a QSD and implemented by a QSP would prevent construction-related impacts related to potential alteration of a drainage pattern or erosion from development activities.

Therefore, compliance with the State Construction General Permit (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ, 2012-0006-DWQ, and 2022-0057-DWQ) and the City of Santa Fe Springs Municipal Code, and other applicable requirements, which would be verified during the City's

construction permitting process, would ensure that Project impacts related to construction activities resulting in a degradation of water quality would be less than significant.

Contaminated Groundwater. The Project site overlies a contaminated groundwater plume identified as a Superfund site pursuant to CERCLA. The contaminated groundwater plume containing PCE and TCE is under remedial action by the USEPA. However, groundwater in the RWQCB monitoring wells in the Project area in May 2022, as recorded in the Phase I and Limited Phase II Environmental Assessment Report for the site, had a depth to groundwater ranging from 105.71 to 111.43 feet below the ground surface. Excavation for the proposed Project is anticipated to reach depths of approximately 15 feet below the ground surface, which would not encroach into groundwater; and there is no potential for contaminated groundwater to be encountered during construction.

However, should Project excavation encounter contaminated water, proposed Project construction would be required to incorporate contaminated dewatering measures in compliance with the Groundwater Discharge Permit (General NPDES Permit No. CAG994004). This permit would require testing and treatment as necessary for water encountered prior to release to surface waters to ensure that discharges do not contain pollutants. Compliance with the requirements of the Groundwater Discharge Permit, which would be implemented through the City's development permitting process, would ensure that potential impacts related to water quality standards or waste discharge requirements would be less than significant.

Operation. The Project site is within the San Gabriel River Watershed and ultimately drains to the San Gabriel River Reach 2, then to San Gabriel River Reach 1 where it joins San Pedro Bay. Various reaches of the San Gabriel River Watershed, including Reach 1 and Reach 2, are on the Section 303(d) List of impaired water bodies for metals and selenium. Currently, the site is approximately 2 percent impervious. The proposed Project would add 1,091,392 SF of impervious surface area (resulting in 93 percent of the site area) and have approximately 7 percent of the Project site as pervious landscaping. Landscape and irrigation plans would be submitted to the City during the permitting process and must include plants approved by the City in order to ensure the use of low-water plants and follow local and State requirements for efficient water use. Therefore, adherence to local and State requirements, as confirmed during the permitting process, would reduce the use of groundwater and maximize infiltration.

Increases in impervious surface area would result in an increase in the volume and flow rate of surface runoff and potential pollutants from vehicles. Operation of the proposed land uses could generate pollutants including trash, debris, oil residue, and other residue that could be deposited on streets, sidewalks, driveways, paved areas, and other surfaces and wash into receiving waters. Pollutants have the potential to further exacerbate existing impairments of local water bodies.

Proposed drainage improvements would include construction of several inlets, roof drains, and onsite drainage pipes to convey site runoff to two underground infiltration trench systems. Overflow for both infiltration trenches would be conveyed to Hawkins Street. The stormwater infrastructure would capture and treat the 85th percentile of a 24-hour storm event, consistent with the County MS4 Permit requirements. The proposed stormwater system would provide improved infiltration compared to existing conditions

In compliance with the NPDES Permit and the City's Municipal Code Chapter 52, development projects are required to prepare a Low Impact Development (LID) report, included as PPP HYD-2. The LID report identifies source control, site design, and treatment control BMPs to protect surface water quality. The LID report is required to be approved prior to the issuance of a building or grading permit which would ensure it complies with the County MS4 Permit regulations. A LID Plan has been prepared per these requirements, inclusive of BMPs. Overall, compliance with existing laws and regulations and implementation of the LID report (included as PPP HYD-2) would ensure that implementation of the proposed Project would not violate any water quality

standards, waste discharge requirements, or otherwise degrade water quality, and impacts would be less than significant.

Impact HYD-2 Finding: The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the Basin (DEIR page 5.6-13). Impacts would be less than significant.

Facts in Support of Finding: The Project site is underlain by the Central Basin, which is fully adjudicated and managed by the WRD. The Sustainable Groundwater Management Act (SGMA) of 2014 created a statewide framework to help protect groundwater resources over the long-term. SGMA requires local agencies to form Groundwater Sustainability Agencies (GSAs) for high and medium priority basins. GSAs are required to then develop and implement Groundwater Sustainability Plans (GSPs) to avoid undesirable results and mitigate overdraft within 20 years. Low priority basins are not required to form GSAs or GSPs at this time. The Central Basin has been identified by the California Department of Water Resources as a very low-priority groundwater basin that is not required to form a GSA or GSP. Additionally, the Central Basin is exempt from this requirement due to the adjudication. Therefore, the proposed Project would not conflict with the SGMA.

The City's Water Utility Authority provides water supply to most of the City, including the Project site. The City currently purchases treated Central Basin groundwater from the WRD, which manages and supplies water from the basin to various municipalities and agencies in the area such that substantial depletion of groundwater supplies would not occur. The water that would be provided to the Project would be through this service provider and at adjudicated quantities. Therefore, the proposed Project would not conflict with the groundwater basin adjudications and would not impede existing groundwater management. Thus, the proposed Project would not substantially decrease groundwater supplies.

Development of the proposed Project would result in 1,091,392 SF of impervious area (93 percent of the site). Runoff from the site would be collected via a proposed onsite storm drain system (including storm inlets and storm drain pipes) and conveyed to two underground infiltration trench systems. The infiltration trenches would be 200 feet by 80 feet and 200 feet by 78 feet and would be located underground below the trailer stalls area, between Building 1 and Building 2. The stormwater infrastructure would capture and treat the 85th percentile of a 24-hour storm event, consistent with the County MS4 Permit requirement. A LID Plan has been prepared for the proposed Project and it includes various BMPs to be incorporated into the Project design to protect water quality and increase the infiltration rate within the site. The proposed stormwater system would provide improved infiltration and groundwater recharge capabilities compared to existing conditions. Therefore, the Project would not substantially impede groundwater recharge of the Project site.

Compliance with the County MS4 permit requirements, the City's Municipal Code, and other applicable requirements implemented through the LID, which would be verified during the Project permitting process, would ensure that Project impacts related to groundwater depletion and recharge would be less than significant.

Impact HYD-3 Finding: The Project would not 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 (DEIR page 5.6-14). Impacts would be less than significant.

Facts in Support of Finding:

Construction. Construction of the Project would require site clearing and grading. Excavation, grading, and other site preparation activities would loosen soils, which has the potential to result in erosion and the loss of topsoil. Also, the Project site is generally flat and does not contain substantial slopes that could induce erosion or siltation, which refers to the accumulation of silt (fine particles of sand, mud, and other materials) in a body of water. The existing NPDES Construction General Permit, as included as PPP HYD-1, requires preparation and implementation of a SWPPP by a Qualified SWPPP Developer for construction activities that disturb one-acre or more of soils. The SWPPP is required to address site-specific conditions related to potential sources of sedimentation and erosion and would list the required BMPs that are necessary to reduce or eliminate the potential of erosion or alteration of a drainage pattern during construction activities.

Overall, with implementation of the existing construction regulations that would be verified by the City during the permitting approval process, impacts related to alteration of an existing drainage pattern during construction that could result in substantial erosion or siltation would be less than significant.

Operation. The existing drainage pattern for the site generally flows from northeast to southwest. Runoff from the site would be collected via a proposed storm drain system (including storm drain inlets and drainage pipes) and conveyed to two underground infiltration trench systems. The two infiltration trenches would be constructed to allow runoff of the whole site including roof and surrounding paved areas to be collected in a perforated pipe and gravel system that would infiltrate into the soil. Overflow for both infiltration trenches would be ultimately conveyed to the existing 51-inch storm drain along the site's eastern boundary, below Hawkins Street. In the post-project condition, the drainage characteristics would be maintained as similar to the pre-Project condition.

The Project site would be mostly developed with impervious surfaces and onsite landscaping would minimize the potential for erosion or siltation on site. The Project would include implementation of BMPs designed to fully capture and infiltrate stormwater pursuant to MS4 requirements, limiting reducing offsite stormwater flows. As part of the permitting approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City's Public Works Department to ensure that they meet the County's NPDES Permit and limit the potential for erosion and siltation. Therefore, impacts related to alteration of a drainage pattern and erosion/siltation from operational activities would be less than significant.

Impact HYD-4 Finding: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site (DEIR page 5.6-15). Impacts would be less than significant.

Facts in Support of Finding:

Construction. Construction of the proposed Project would include activities that could temporarily alter the existing drainage pattern of the site, for example by constructing foundations and paved areas, and could result in flooding on- or offsite if drainage is not properly controlled. However, implementation of the Project requires a SWPPP that would address site-specific drainage issues related to construction of the Project and include BMPs to eliminate the potential of flooding or alteration of a drainage pattern during construction activities. This includes diverting runoff from rooftops and other impervious surfaces to vegetated areas, when possible, to promote infiltration and controlling the perimeter of site using sandbags, berms, and silt fencing. These regulations would ensure that the rate or amount of surface runoff would not substantially increase during the construction phase. Therefore, impacts related to rate or amount of surface runoff would be less than significant.

Operation. The proposed Project would result in an increase in impervious areas onsite. As a result, the Project would increase surface flows compared to existing conditions. However, the proposed Project includes installation of new stormwater drainage facilities, including two underground infiltration trench systems, pervious landscaped areas, and new storm drains. The proposed stormwater drainage system would collect onsite flows via a series of catch basins and storm drains.

Proposed onsite drainage infrastructure has capacity to retain 85 percent of the Project site's DCV, consistent with the County MS4 Permit requirement. Overflow for both infiltration trenches would be conveyed ultimately to the existing storm drain along the site's eastern boundary, below Hawkins Street. Implementation of the Project would maintain existing drainage patterns of the Project site. The use of the onsite infiltration trench systems would regulate the rate and velocity of stormwater flows and would control the amount of discharge into the offsite drainage system. The proposed Project is not anticipated to result in flooding conditions to upstream or downstream properties with the implementation of BMPs identified in the LID plan. As part of the permitting approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City Department of Public Works to ensure that they meet the County MS4 Permit requirements and would not result in flood impacts.

Overall, the drainage facilities proposed for the Project have been sized to be consistent with the County MS4 permit requirements. Thus, implementation of the Project would not substantially increase the rate or amount of surface runoff, such that flooding would occur. Impacts would be less than significant.

Impact HYD-5 Finding: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would 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 (DEIR page 5.6-15 -5.6-16). Impacts would be less than significant.

Facts in Support of Finding: The Project site currently can be considered 2 percent impervious. Development of the proposed Project would result in 1,091,392 SF (or 93 percent) of impervious area. The Project site currently drains from northeast to southwest. Flows from the project site currently discharge to a 51-inch storm drain that runs parallel to and within a few feet inside the Project's east property line and eventually drain into the San Gabriel River.

The proposed underground infiltration trench systems would regulate the rate and velocity of stormwater flows and would control the amount of discharge into the offsite drainage system. The proposed drainage facilities have been sized to adequately accommodate the stormwater flows from the proposed development and are consistent with the County drainage plans and County MS4 permit requirements, with a has capacity to retain 85 percent of the Project site's DCV. Overflow for both infiltration trenches would be ultimately conveyed to the existing storm drain along the eastern boundary of the site, below Hawkins Street. Implementation of the Project would maintain existing drainage patterns of the Project site. The LID Plan prepared for the proposed Project includes various BMPs to be incorporated into the Project design to protect water quality. Therefore, the proposed Project is not anticipated to result in flooding conditions or substantial additional sources of polluted runoff to upstream or downstream properties with implementation of BMPs identified in the LID plan. Overall, the proposed drainage improvements would be consistent with County standards and MS4 permit requirements. Therefore, Project impacts would be less than significant.

Impact HYD-6 Finding: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows (DEIR page 5.6-16). Impacts would be less than significant.

Facts in Support of Finding: The Project site generally drains from northeast to southwest. Implementation of the Project would maintain existing drainage patterns of the Project site, for example by constructing foundations and paved areas, and could result in flooding on- or offsite if drainage is not properly controlled. However, implementation of the Project requires a SWPPP that would address site specific drainage issues related to construction of the Project and include BMPs to eliminate the potential of flooding or alteration of a drainage pattern during construction activities. This includes regular monitoring and visual inspections during construction activities. Compliance with the County MS4 Permit and a SWPPP, as verified by the City through the construction permitting process, would prevent construction-related impacts related to potential impediment or redirection of flood flows.

Per the FEMA's Flood Map Service Center, the Project is within Zone X, an area determined to be outside of the 0.2 percent annual chance floodplain (Map Number 06037C1829F). The Project site would result in an increase in impervious areas thus the Project would increase surface flows compared to existing conditions. However, the proposed Project would include installation of new stormwater drainage facilities, including two underground infiltration trench systems, pervious landscaped areas, and new storm drains. The proposed stormwater drainage system would collect onsite flows via a series of catch basins and storm drains. Proposed onsite drainage infrastructure has capacity to retain 85 percent of the Project site's DCV, consistent with the County MS4 Permit requirement. Overflow for both infiltration trenches would be conveyed ultimately to the existing 51-inch storm drain along the site's eastern boundary, below Hawkins Street. Implementation of the Project would maintain existing drainage patterns of the Project site. The use of the onsite infiltration trench systems would regulate the rate and velocity of stormwater flows and would control the amount of discharge into the offsite drainage system. The proposed flowrate would be slightly greater than the existing flowrate; however, the drainage system would be designed consistent with County MS4 Permit standards. As part of the permitting approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City Department of Public Works to ensure that they meet the County MS4 Permit requirements and would not result in flood impacts. The Project site is not within an existing floodplain and would not contribute to increased flooding. Thus, implementation of the Project would not substantially impede or redirect flood flows and impacts would be less than significant.

Impact HYD-7 Finding: The Project would not be located in flood hazard, tsunami, or seiche ones, and risk release of pollutants due to Project inundation (Initial Study page 56). Impacts would be less than significant.

Facts in Support of Finding: According to FEMA FIRM Map 06037C1829F, the Project site is completely located in "Zone X," which is an area of minimal flood hazard. Thus, the proposed Project would not be located within a flood hazard zone and would result in a less than significant impact on flood hazard.

Tsunamis are large waves that occur in coastal areas; therefore, since the City is not located in a coastal area, no impacts due to tsunamis would occur. Additionally, the Project site does not contain and is not adjacent to any water bodies that could seiche. The nearest body of water is the San Gabriel River, approximately 1.5 miles to the west, which is not a contained body of water with seiche potential. Therefore, the Project would result in no impacts related to tsunamis and seiche zones. This topic will not be further analyzed in the EIR.

Impact HYD-8 Finding: The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan (DEIR page 5.6-16 – 5.6-17). Impacts would be less than significant.

Facts in Support of Finding: The site is approximately 2 percent impervious in the existing condition. Development of the proposed Project would result in 1,091,392 SF (or 93 percent) of impervious area. The

proposed storm drain system is sized to adequately accommodate increased stormwater flows from the Project area and would maintain the existing drainage pattern of the site. Runoff would discharge and be treated into the two underground infiltration trench systems onsite that would filter and infiltrate stormwater into the site soils and potentially the groundwater. Therefore, the Project would not conflict with or obstruct the SGMA. The City is within the jurisdiction of the Los Angeles RWQCB (Region 4). The Los Angeles RWQCB sets water quality standards for all ground and surface waters within its region through implementation of a Water Quality Control Plan (Basin Plan). This Basin Plan gives direction on the beneficial uses of the State waters within Region 4, describes the water quality that must be maintained to support such uses, and provides programs, projects, and other actions necessary to achieve the established standards. The Los Angeles County's NPDES Permit, incorporated in the City's Municipal Code Chapter 52, would require development projects to prepare a LID, included as PPP HYD-2. The LID plans are required to include BMPs for source control, site design, and treatment control. LID plans would be reviewed and approved by the City's Public Works Department prior to issuance of grading permits to ensure compliance. The City's permitting process would ensure that all BMPs in the LID report are constructed during implementation of the Project. As discussed under Impact HYD-2, the Central Basin is adjudicated, and therefore, is not subject to a sustainable groundwater management plan. Thus, the Project would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Hydrology and Water Quality Cumulative Impact Finding: The Project would not result in cumulative impacts related to hydrology and water quality (Draft EIR page 5.6-17).

Facts in Support of Finding: The areas considered for cumulative impacts to hydrology and water quality are the Lower San Gabriel River Watershed for drainage and water quality impacts, and the Central Basin for groundwater impacts.

Water Quality: The geographic scope for cumulative impacts related to hydrology and water quality includes the Lower San Gabriel River watershed because cumulative projects and developments pursuant to the proposed Project could incrementally exacerbate the existing impaired condition and could result in new pollutant-related impairments. Related developments within the watershed would be required to implement water quality control measures pursuant to the same NPDES General Construction Permit that requires implementation of a SWPPP (for construction), a LID plan (for operation) and BMPs to eliminate or reduce the discharge of pollutants in stormwater discharges, reduce runoff, reduce erosion and sedimentation, and increase filtration and infiltration. The NPDES permit requirements have been set by the SWRCB and implemented by the Los Angeles RWQCB (and Santa Fe Springs Municipal Code) to reduce incremental effects of individual projects so that they would not become cumulatively considerable. Therefore, overall potential impacts to water quality associated with present and future development in the watershed would not be cumulatively considerable upon compliance with all applicable laws, permits, ordinances and plans. The proposed Project would be implemented in compliance with all regulations, as would be verified during the permitting process. Therefore, cumulative impacts related to water quality would be less than significant.

Drainage: The geographic scope for cumulative impacts related to stormwater drainage includes the geographic area served by the existing stormwater infrastructure for the Project area, from capture of runoff through final discharge points. The proposed Project includes installation of two underground infiltration trench systems that would retain, slow, filter, and infiltrate 85th percentile of a 24-hour design storm. These facilities would retain runoff and reduce erosion and siltation. In addition, pursuant to State and regional regulations that require development projects to maintain pre-project hydrology, no net increase of offsite stormwater flows would occur. As a result, the proposed Project would not generate runoff that could combine with additional runoff from cumulative projects that could cumulatively combine to impact

erosion, siltation, flooding, and water quality. Thus, cumulative impacts related to drainage would be less than significant.

Groundwater Basin: The geographic scope for cumulative impacts related to the groundwater basin is the Central Basin. As described above, the proposed Project includes installation of underground infiltration trench systems that would recharge stormwater into the groundwater basin. In addition, the volume of water that would be needed by the Project is within the anticipated groundwater pumping volumes since the basin is adjudicated. Therefore, the Project would not result in changes to the projected groundwater pumping that would decrease groundwater supplies. As a result, the proposed Project would not generate impacts related to the groundwater basin that have the potential to combine with effects from other projects to become cumulatively considerable. Therefore, cumulative impacts related to the groundwater basin would be less than significant.

Plans, Programs, and Policies

PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Building and Safety Department with evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the SWRCB. The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

PPP HYD-2: LID. Prior to the issuance of any grading permits, a completed Low Impact Development Plan (LID) shall be submitted to and approved by the City's Public Works Department. The LID shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.

5.11 LAND USE AND PLANNING

Impact LU-1 Finding: The Project would not physically divide an established community (Initial Study page 57). No impact would occur.

Facts in Support of Finding: Implementation of the proposed Project would not divide an established community. The 26.77-acre Project site is heavily disturbed and contains one, single-story office building on the western edge of the property and a canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. In addition, the proposed Project does not involve the development of roadways or other infrastructure that would divide a community. Therefore, the proposed Project would not have an impact on an established community.

Impact LU-2 Finding: The Project would not cause a significant environmental impact due to conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect (Initial Study page 57). No impact would occur.

Facts in Support of Finding: Currently, the Project site is designated as Industrial and zoned as M-2. The proposed Project would be consistent with the existing land use designation and zone. The Project site's surrounding areas are primarily industrial uses. Neither the land use nor zoning designations for the Project

site allow for residential development. Therefore, the proposed Project would not conflict with the existing General Plan and policies.

Land Use and Planning Cumulative Finding: The Project would not result in cumulative impacts to land use and planning.

Facts in Support of Finding: Based on the foregoing discussion under Impacts LU-1 through LU-2, the Project would not result in, or contribute to, a cumulatively significant impact to land use and planning.

5.12 MINERAL RESOURCES

Impact MIN-1 Finding: The Project would not 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 (DEIR page 5.7-3). Impacts would be less than significant.

Facts in Support of Finding: The Project site contains over 100 active, plugged, idle, and/or cancelled oil wells, with six jacks along with tanks, pipes, and associated infrastructure. As such, the Project site contains mineral resources. The proposed Project would demolish the existing building and abandon the existing oil wells pursuant to the requirements listed under Sections 117.129 and 117.130 of the Santa Fe Springs Municipal Code. The California Department of Conservation MRZ-2 sites are areas with identified mineral resources, and MRZ-4 sites are areas with unknown potential for mineral resources. According to the City of Santa Fe Springs General Plan EIR, there are no portions of the City that are designated MRZ-2 or MRZ-4. As such, there are no areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists within the City. Therefore, the Project site is not identified as containing mineral resources that would be of value to the region and the residents of the State.

The City's General Plan includes Policy S-3.6, to promote the gradual consolidation and elimination of oil drilling and production sites to advance the City's climate adaptation and resiliency strategies, local reduction of greenhouse gases, and land use goals. Therefore, the existing oil wells within the city are not considered of value to the region. Redevelopment of the site and abandonment of the existing oil wells onsite would be consistent with General Policy S-3.6. Overall, there are no areas of the City, including the Project site, where adequate information indicates that significant mineral deposits are present or with a high likelihood for their presence to exist. Abandonment of the existing oil wells would be pursuant to the requirements listed under Sections 117.129 and 117.130 of the Santa Fe Springs Municipal Code and would be consistent with General Plan Policy S-3.6. Therefore, impacts to mineral resources would be less than significant.

Impact MIN-2 Finding: The Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on the general plan, specific plan, or other land use plan (DEIR page 5.7-4). No impact would occur.

Facts in Support of Finding: The Project site has a land use designation of Industrial. The Industrial land use designation is intended to provide locations for general industrial, manufacturing, outdoor storage and logistics services, and does not delineate a mineral resource recovery site. As such, the Project site land use designation is not compatible with the extraction of mineral resources. According to the Project site land use designation, the Project site area is not planned for future mining. Therefore, the proposed Project would not result in impacts to mineral resource recovery sites delineated on a land use plan.

Cumulative Impact Finding: The Project would not result in cumulative impacts related to mineral resources. (DEIR page 5.7-4). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project's potential to result in cumulatively considerable impacts to mineral resources are analyzed in conjunction with other projects located in the City of Santa Fe Springs General Plan area. A majority of the land within the city is designated as MRZ-1, and no land is designated for mineral resource recovery within the General Plan. Overall, there are no areas of the City, including the Project site, where adequate information indicates that significant mineral deposits are present or with a high likelihood for their presence to exist. As such, closeout of existing oil wells would not cumulatively result in impacts related to loss of a mineral resource. Thus, buildout of the proposed Project would not result in cumulatively considerable impacts to mineral resources.

5.13 NOISE

Impact NOI-1 Finding: The Project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies (DEIR page 5.8-15). Impacts would be less than significant.

Facts in Support of Finding:

Construction. Potential noise impacts associated with the construction of the proposed Project would be from construction-generated vehicular traffic on the nearby roadways and from noise generated from construction equipment onsite. Construction crew commutes and the transport of construction equipment and materials to the site for the proposed Project would incrementally increase noise levels on access roads leading to the site. As described in the DEIR, an additional 1,972 vehicles in passenger car equivalent (PCE) volume, during operations of the Project, however, sensitive receivers would experience an offsite traffic noise level increase of 0.0 dBA CNEL noise increase both the existing and opening years, which is below the threshold of 1.5 dBA noise level increase. Therefore, short-term, construction-related impacts associated with worker commute and equipment transport to the Project site would be less than significant.

Noise generated by construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators that can reach high levels when combined. Table 5.8-6 of the DEIR lists typical construction equipment noise levels recommended for noise impact assessments, based on a distance of 50 feet between the equipment and a noise receptor. The Project construction composite noise levels at a distance of 50 feet would range from 76.2 dBA Leq to 86.8 dBA Leq with the highest noise levels occurring the demolition/ well equipment removal and site preparation phases. Per City of Santa Fe Springs Municipal Code Section 155.425(B), noise sources associated with construction activities are exempt from the City's established noise standards if the activities do not take place within a residential zone or within a radius of 500 feet from a residential zone between the hours of 7:00 p.m. of any one day and to 7:00 a.m. of the next day. The proposed Project's construction activities would occur pursuant to these regulations. Thus, the construction activities would be in compliance with the City's construction-related noise standards.

While construction noise will vary, it is expected the highest construction noise levels at the nearest residential uses to the south of the Project site would reach between 63.4 and 64.2 dBA Leq during daytime hours as described in Section 5.8, Noise of the DEIR. These predicted noise levels would only occur when all construction equipment is operating simultaneously, and therefore, are assumed to be rather conservative in nature. While construction-related short-term noise levels have the potential to be higher than existing ambient noise levels in the Project area under existing conditions, the noise impacts would no longer occur once Project construction is completed. As construction noise from the proposed Project at the nearby receptor locations

would range from 63.4 to 64.2 dBA L_{eq} , construction-related noise impacts would remain well below the 80 dBA L_{eq} 1-hour construction noise level criteria for daytime construction noise for and residential uses. Therefore, impacts related to construction noise would be less than significant.

Operation. Potential noise impacts associated with the operations of the proposed Project would be from project-generated vehicular traffic on the nearby roadways and from onsite activities, which have been analyzed separately below.

Traffic Noise Impacts. Table 5.8-8 of the DEIR provides the traffic noise levels for the opening year traffic with the proposed Project. These noise levels represent the worst-case scenario, which assumes no shielding is provided between the traffic and the location where the noise contours are drawn.

As shown in Table 5.8-8 of the DEIR the increase in Project-related traffic noise would not exceed the threshold of 1.5 dBA noise level increase at sensitive receiver locations. Therefore, traffic noise impacts from Project-related traffic on offsite sensitive receivers would be less than significant, and no mitigation measures are required.

Offsite Stationary Noise Impacts. Adjacent offsite land uses would be potentially exposed to stationary-source noise impacts from the proposed loading dock activity, tractor trailer storage activity, roof-top air conditioning units, parking lot vehicle movements, trash enclosure activity and truck movements. To provide a conservative analysis, it is assumed that the Project would be operational 24 hours per day, seven days per week.

The daytime hourly noise levels at the offsite receiver locations are expected to range from 38.2 to 42.6 dBA L_{eq} at the existing noise sensitive receiver locations. DEIR Table 5.8-10 shows the Project operational noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. The nighttime hourly noise levels at the offsite receiver locations are expected to range from 37.3 to 41.8 dBA L_{eq} at the existing noise sensitive receiver locations.

The Project would include seven rooftop HVAC units on each building (14 total). The HVAC equipment is expected to operate for an average of 39 minutes per hour during the daytime hours, and 28 minutes per hour during the nighttime hours. These operating conditions reflect peak summer cooling requirements with measured temperatures approaching 96 degrees Fahrenheit ($^{\circ}$ F) with average daytime temperatures of 82 $^{\circ}$ F.

DEIR Table 5.8-11 shows operational noise levels associated with the Project compared to the City of Santa Fe Springs exterior noise level standards. As shown, Project operational noise levels would range from 38.2 dBA L_{eq} to 42.6 dBA L_{eq} during the daytime and from 37.3 dBA L_{eq} to 41.8 dBA L_{eq} during the nighttime. Operational noise levels would not exceed the City of Santa Fe Springs exterior noise level standards of 50 dBA L_{eq} during the daytime and 45 dBA L_{eq} during the nighttime. Therefore, the stationary operational noise impacts would be less than significant.

Impact NOI-2 Finding: The Project would not result in generation of excessive groundborne vibration or groundborne noise levels (DEIR page 5.8-20-5.8-21). Impacts would be less than significant.

Facts in Support of Finding:

Construction. Construction activities for development of the proposed Project would include excavation and grading activities, which have the potential to generate low levels of groundborne vibration. People working

in close proximity to the construction could be exposed to the generation of excessive groundborne vibration or groundborne noise levels related to construction activities.

The excavation and grading activities that are required for construction of the Project can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. DEIR Table 5.8-12 shows the PPV values at 25 feet from the construction vibration source. The primary source of vibration during construction would be from the operation of a vibratory roller. As shown in DEIR Table 5.8-12, a vibratory roller would create a vibration level of 0.210 inch per second PPV at 25 feet. Based on typical propagation rates, the vibration level at the nearest offsite structures (located at a distance ranging from 358 feet to 474 feet from the Project site) would range from 0.003 to 0.004 inch per second PPV, which is below the Caltrans Transportation and Construction Guidance Manual threshold of 0.3 PPV inch per second. Additionally, Project construction activities would be regulated by the City of Santa Fe Springs Municipal Code which states that operation of equipment or performance of any outside construction or repair work on buildings, structures, or projects or operation of any pile driver, power shovel, pneumatic hammer, derrick, power hoist, or any other construction type device is not allowed between the hours of 7:00 p.m. of one day and 7:00 a.m. of the next day. As such, vibration impacts would not occur during the more sensitive nighttime hours. Therefore, impacts related to construction vibration would be less than significant.

Operation. Operation of the proposed Project would include operation of heavy trucks, deliveries, moving trucks, and garbage trucks for solid waste disposal. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement conditions. However, vibration levels generated from Project-related traffic within the Project site and on the adjacent roadways are unusual for on-road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Vibration levels generated from Project-related traffic on the adjacent roadways would be less than significant.

Impact NOI-3 Finding: The Project is not located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, or within two miles of a public airport or public use airport and would not expose people residing or working in the project area to excessive noise levels (DEIR page 5.8-22). No impact would occur.

Facts in Support of Finding: The proposed Project site is not located within two miles of an airport or airstrip. The nearest airport is the Long Beach Airport (LGB), located approximately 9.7 miles southwest of the Project site. Therefore, the Project site would not be exposed to excessive noise levels from airport operations and would result in no impact.

Cumulative Impact Finding: The Project would result in cumulative impacts related to noise (DEIR page 5.11-22). Impacts would be less than significant.

Facts in Support of Finding: Cumulative noise assessment considers development of the proposed Project in combination with ambient growth and other development projects within the vicinity of the Project area. As noise is a localized phenomenon and drastically reduces in magnitude as distance from the source increases, only projects and ambient growth in the nearby area could combine with the proposed Project to result in cumulative noise impacts.

Development of the proposed Project in combination with the related projects would result in an increase in construction-related and traffic-related noise. However, City of Santa Fe Springs Municipal Code Section 155.425(B) requires construction activities to not occur between the hours of 7:00 p.m. of one day and 7:00 a.m. of the next day within a residential zone or within 500 feet therefrom; therefore, noise and vibration impacts would not occur during the more sensitive nighttime hours.

The closest cumulative project is adjacent to the Project site. The Telegraph Road and Santa Fe Springs Road Industrial Park Project site is located directly adjacent to the south and east of the Project site. The Telegraph Road and Santa Fe Springs Road Industrial Park Project was under pre-construction permitting process as of the preparation of the Draft EIR. Construction of the proposed Project is anticipated to last approximately 18 months and is planned to begin the second quarter of 2025 and end the first quarter of 2027.

Therefore, construction activities of the adjacent and other nearby projects could overlap. However, cumulative noise increases due to construction would be temporary and localized. Construction noise from the proposed Project at the nearby receptor locations would range from 63.4 and 64.2 dBA Leq, which is less than the existing ambient noise levels ranging between 66.9 dBA Leg to 68.5 dBA Leg in the daytime and from 64.0 dBA Leq to 65.7 dBA Leq during nighttime hours. Therefore, due to the distance from nearby receptors and volume of the Project's construction noise and vibration levels, effects would not combine to become cumulatively considerable, and cumulative noise and vibration impacts associated with construction activities would be less than significant.

Cumulative mobile source noise impacts would occur primarily as a result of increased traffic on local roadways due to the proposed Project and related projects within the study area. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of the proposed Project traffic volumes on the roadways in the Project vicinity. The increase in noise levels associated with the traffic volumes of the proposed Project were previously identified. As detailed, development of the proposed Project would result in noise levels much lower than the 3 dBA threshold at sensitive receptor locations. Therefore, the Project would not result in a cumulatively considerable impact when combined with existing and future development. Cumulative impacts would be less than significant.

5.14 POPULATION AND HOUSING

Impact POP-1 Finding: The Project would not induce substantial unplanned population growth in an area, either directly or indirectly (Initial Study page 60). Impacts would be less than significant.

Facts in Support of Finding: The Project would result in an increase in employment at the Project site that could lead to a potential population increase in the surrounding area. According to the Southern California Association of Governments (SCAG), the generation rate for employees required for operation of an industrial project is one employee for every 1,518 SF of industrial space. As the Project would build and operate two industrial warehouses totaling 584,678 SF, operation of the Project would require approximately 385 employees, which represents approximately 16.74 percent of the forecasted employment growth between 2019 and 2050 for the City. However, according to the Employment Development Department, as of March 2024, Santa Fe Springs' unemployment rate was approximately 8 percent. Thus, although the Project would generate additional long-term employment in the Project area, the new employment opportunities would also serve to decrease the City's unemployment rate. As such, the generation of new employees would be within the forecasted and planned growth of the City and the Project would result in a less than significant impact related to inducement of substantial unplanned population growth.

Impact POP-2 Finding: The Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere (Initial Study page 67). No impact would occur.

Facts in Support of Finding: The 26.77-acre Project site is heavily disturbed and contains one, single-story office building on the western edge of the property and a canopy structure to the northeast of the building

used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. No residential structures exist on the Project site nor are they currently planned for future development of residential uses. Therefore, no impact would occur.

Population and Housing Cumulative Finding: The Project would not result in cumulative impacts to population and housing.

Facts in Support of Finding: Based on the foregoing discussion under Impacts POP-1 and POP-2, the Project would not result in, or contribute to, a cumulatively significant impact to population and housing.

5.15 PUBLIC SERVICES

Impact PS-1i Finding: The Project would not 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 fire protection services (Initial Study page 61). Impacts would be less than significant.

Facts in Support of Finding: The closest fire station to the Project site is Station No.4, located approximately 1.4 miles west of the Project site, at 11736 Telegraph Rd, Santa Fe Springs, CA 90670. Construction and operation of the proposed Project would result in an increased number of employees in the Project area; however, the Project would not directly or indirectly induce substantial population growth in the City. In addition, the Project would include new fire prevention infrastructure pursuant to current code requirements. The City has adopted the California Fire Code (Title 24, Part 9 of the California Code of Regulations) in Section 93.01 of the City Municipal Code, which regulates new structures related to safety provisions, emergency planning, fire-resistant construction, fire protection system, and appropriate emergency access throughout the site. Since the site is already served by the fire department, and the Project would be constructed pursuant to existing California Fire Code regulations, the Project would not result in the need for new or physically altered fire department facilities that could cause significant environmental impacts. Therefore, the Project would result in less than significant impacts related to fire protection services.

Impact PS-1ii Finding: The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police service facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios and response times or other performance objectives for police services (Initial Study page 61). Impacts would be less than significant.

Facts in Support of Finding: The City of Whittier Police Department provides policing services for the City of Santa Fe Springs under contract. The Police Services Center is located at 11576 Telegraph Road, Santa Fe Springs, CA 90670, approximately 1.2 miles west of the Project site. According to the City of Santa Fe Springs, the City is divided into three law enforcement public service areas which have a dedicated sergeant and a team of officers and public safety officers. More specifically, the City has a total of 35 sworn and 6 support personnel. The Project is not anticipated to directly or indirectly induce unplanned population growth in the City. Although the Project could potentially result in a slight incremental increase in calls for service to the Project site compared to existing conditions, this increase is expected to be nominal (as opposed to new residential or commercial/retail land uses, which do result in greater increase in calls for service) and would not result in the need for new police protection facilities. Therefore, impacts would be less than significant.

Impact PS-1iii Finding: The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, the construction of which could cause significant

environmental impacts, in order to maintain acceptable service ratios or other performance objectives (Initial Study page 62). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project would develop a warehouse facility that would not directly generate students. The Project is not anticipated to generate a new population, as the employees needed to operate the Project are anticipated to come from within the Project region and substantial immigration of employees that could generate new students is not anticipated to occur. Thus, the Project would not generate the need for new or physically altered school facilities and impacts would be less than significant.

Additionally, pursuant to Government Code Section 65995 et seq., the need for additional school facilities is addressed through compliance with school impact fee assessment. SB 50 (Chapter 407 of Statutes of 1998) sets forth a State school facilities construction program that includes restrictions on a local jurisdiction's ability to condition a project to mitigate its impacts on school facilities in excess of fees set forth in the Government Code. The Project would be required to contribute fees to the Little Lake City School District in accordance with the Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50), as included by PPP PS-1. Pursuant to Senate Bill 50, payment of school impact fees constitutes complete mitigation under CEQA for Project-related impacts to school services. Therefore, impacts would be less than significant.

Plans, Programs, and Policies

PPP PS-1: School Fees: Prior to the issuance of either a certificate of occupancy or prior to building permit final inspection, the applicant shall provide payment of the appropriate fees set forth by the applicable school districts related to the funding of school facilities pursuant to Government Code Section 65995 et seq.

Impact PS-1iv Finding: The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives (Initial Study page 62). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project would develop two new industrial warehouses and does not include development of park facilities. In addition, the proposed Project is not anticipated to result in an influx of new residents, as the employees needed to operate the proposed buildings are primarily anticipated to come from the unemployed labor force in the region. Thus, the proposed Project would not generate a substantial population that would require construction or expansion of park facilities, and impacts would be less than significant.

Impact PS-1v Finding: The Project would not result in substantial adverse physical impacts associated with other public facilities. (Initial Study page 62). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project involves construction and operation of two new warehouse buildings and would not provide new housing opportunities to the area. The proposed Project is not likely to create a significant increase in the use of other public facilities such as libraries, community centers, post offices or animal shelters. Therefore, impacts would be less than significant.

Public Services Cumulative Finding: The Project would not result in cumulative impacts to public services.

Facts in Support of Finding: Based on the foregoing discussion under Impacts PS-1i through PS-1iv, the Project would not result in, or contribute to, a cumulatively significant impact to public services.

5.16 RECREATION

Impact REC-1 Finding: The Project would not result in increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated (Initial Study page 63). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project would develop two industrial warehouse buildings and associated onsite infrastructure consisting of a total building area of 584,678 SF. Implementation of the proposed Project would not directly increase housing or population as the proposed Project does not propose any type of residential use or other land use which typically cause an increase in the demand for, and use of, existing neighborhood parks and other citywide recreational facilities. The closest park is Heritage Park, located approximately half a mile from the Project site. Although the proposed Project would generate new employees that may occasionally increase the use of existing local, neighborhood, and regional parks, employees' use of parks would be limited and would therefore not result in accelerated deterioration to facilities such that the construction or expansion of recreational facilities would be necessary. As such, impacts would be less than significant.

Impact REC-2 Finding: The Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment (Initial Study page 63). Impacts would be less than significant.

Facts in Support of Finding: The Project does not propose any residential facilities or other land use that would cause a direct increase in housing or the residential population. The indirect increase in population as a result of new employment opportunities would not result in additional use of recreational facilities sufficient to cause deterioration such that the construction or expansion of recreational facilities would be necessary. Therefore, the proposed Project would have no new impacts related to expansion of recreational facilities.

Recreation Cumulative Finding: The Project would not result in cumulative impacts to recreation.

Facts in Support of Finding: Based on the foregoing discussion under Impacts REC-1 and REC-2, the Project would not result in, or contribute to, a cumulatively significant impact to recreation.

5.17 TRANSPORTATION

Impact TRA-1 Finding: The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities (DEIR page 5.9-8). Impacts would be less than significant.

Facts in Support of Finding:

Transit. The Project vicinity is served by Metrolink, Foothill Transit, Montebello Bus Lines, and Norwalk Transit System. The nearest bus stops to the Project site include: Metrolink, located on the corner of Telegraph Road and Norwalk Boulevard, approximately 1,570 linear feet from the Project site, as well as on the corner of Telegraph Road and Santa Fe Springs Road, approximately 290 linear feet from the Project site; and the Norwalk Transit System, also located on the corner of Telegraph Road and Santa Fe Springs Road, approximately 290 feet from the Project site. These existing transit services would continue to serve ridership in the area and may also serve employees of the Project. Accordingly, the proposed Project would not alter or conflict with existing transit stops and schedules, and impacts related to transit services would not occur.

Bicycle Facilities. There are existing Class III bike lanes on both sides of Santa Fe Spring Road between Telegraph Road and Los Nietos Road. The City of Santa Fe Springs General Plan Circulation Element identifies Santa Fe Springs Road, located east of the Project site, as a proposed buffered bike lane (Class IIB). In addition, Los Nieto's Road, located approximately 1,995 linear feet north of the Project site, is identified as a proposed buffered bike lane (Class IIB); Clark Street, located approximately 1,285 linear feet south of the Project site (south of the residential area), is identified as a proposed Bicycle Route (Class III); and Geary Avenue, located approximately 2,255 linear feet west of the Project site, is identified as a proposed Bicycle Lane (Class II). The Project does not propose offsite roadway improvements. As such, the proposed Project would not encroach upon public right of way and would not prevent the development of these proposed bicycle facilities. The proposed Project would include 19 bicycle stalls for Building 1 and 15 bicycle stalls for Building 2, for a total of 34 bicycle stalls for the Project. Furthermore, the existing bike lanes on Santa Fe Springs Road would remain and may potentially be used by employees of the Project site. As a result, the Project would not result in any conflicts with existing or proposed bicycle facilities. Thus, impacts related to bicycle facilities would not occur.

Pedestrian Facilities. There are existing sidewalks adjacent to the Project site on Telegraph Road to the south, Santa Fe Springs Road to the east, and on Hawkins Street to the west. Hawkins Street is a local street that extends east to west from just west of the Project site to Norwalk Boulevard. The proposed Project would include the construction of an onsite cul-de-sac driveway that would include an approximately 11-foot sidewalk. The proposed sidewalk would connect to the existing sidewalk on Hawkins Street, east of the Project site, on both sides of the street. The proposed sidewalk connection would be developed in accordance with the City of Santa Fe Springs General Plan and the City of Santa Fe Springs Municipal Code standards and guidelines. As a result, the Project would enhance existing pedestrian facilities, and impacts related to pedestrian facilities would not occur.

Truck Route Facilities. The City of Santa Fe Springs General Plan identifies Telegraph Road, located south of the Project site, and Santa Fe Springs Road, located east of the Project site, as key arterial roads that provide freight access to and from I-5, I-605, SR-72 (Whittier Boulevard), and SR-19 (Rosemead Boulevard). The Project site would be accessed by trucks from a proposed cul-de-sac driveway along Hawkins Street. Truck movement to and from the Project site would directly access the Santa Fe Springs General Plan designated freight system roads identified in Figure 5.9-1 utilizing I-605 to Telegraph Road and continuing east to Norwalk Boulevard, then north to Hawkins Street, and east to the Project site. Therefore, the proposed Project is consistent with the freight system identified in the City of Santa Fe Springs General Plan Circulation Elements, and impacts related to truck route facilities would not occur.

Roadway Facilities

Operation. Regional access to the Project site is provided by I-5, I-605, and SR-72; local access to the Project site is provided via Telegraph Road and Santa Fe Springs Road, as described in Section 3.0, *Project Description*. Vehicular traffic to and from the Project site would continue to utilize the existing network of regional and local roadways that currently serve the Project vicinity. Access to the Project site would be provided from two existing driveways on Telegraph Road and Santa Fe Springs Road, and from one proposed cul-de-sac driveway on Hawkins Street. All three driveways would allow for both automobile and truck access. The Project does not propose new roadways or offsite roadway improvements.

DEIR Table 5.9-1 identifies the number of trips that would be generated by the Project. The Project would generate a total of 1,394 daily trips, inclusive of 130 AM (99 inbound and 31 outbound), and 138 PM (40 inbound and 98 outbound) peak hour trips. When converted to passenger car equivalent (PCE) trips, the

proposed Project is estimated to generate approximately 1,972 daily PCE trips, inclusive of 166 PCE AM trips (128 inbound and 38 outbound) and 174 PCE PM trips (51 inbound and 123 outbound).

Construction. Construction of the proposed Project is anticipated to occur over an 18-month period. Construction-related trips generated on a daily basis throughout various construction activities would be derived from construction workers and delivery of materials and would vary depending on the phase of construction. It is anticipated that Project construction would generate haul trips that would be distributed throughout the day. During construction, there would also be passenger car construction trips associated with crew arrivals and departures. The weekday AM peak period is 7:00 AM to 9:00 AM, and the weekday PM peak period is 4:00 PM to 6:00 PM. It is anticipated the majority of construction crews would arrive and depart outside the peak hours, while delivery trucks would arrive and depart throughout the day. Project grading is anticipated to result in an export of 25,000 cubic yards (CY) of soil due to soil contamination and in an import 126,929 CY of soil.

As shown in DEIR Table 5.9-2, the building construction phase of the construction process would generate the most vehicular trips per day from approximately 246 workers and 96 vendors per day, resulting in a total of 342 daily trips during building construction phase that would last approximately 220 working days. This is substantially less than that which would be generated from operation of the Project.

All construction equipment, including construction worker vehicles, would be staged on the Project site for the duration of the construction period. In addition, as part of the grading and building plan review processes, the City construction permits would require appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures (as applicable). Therefore, construction impacts related to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system would be less than significant.

In 2020, Santa Fe Springs completed the 2020 Active Transportation Plan, which represents a new commitment to promoting walking and biking. The goal of the plan was to help the community move toward a more sustainable, multi-modal transportation system that serves all residents regardless of age, ability, identity, or income. The Active Transportation Plan is incorporated into the City's General Plan Circulation Element discussed above. Therefore, because the Project is consistent with the City's General Plan, the proposed Project is also consistent with the Santa Fe Springs Active Transportation Element.

Impact TRA-3 Finding: The Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curve or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts would be less than significant (DEIR page 5.9-13).

Facts in Support of Finding:

Construction. The Project proposes development of the site in one phase lasting approximately 18 months. During construction, worker vehicles, haul trucks, and vendor trucks would be staged on the portion of the Project site under construction for the duration of the construction period. As part of the grading plan and building plan review processes, City permits would require appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures and measures to properly route heavy-duty construction vehicles entering and leaving the site (as applicable). As a result, impacts related to vehicular circulation design features and incompatible uses during construction of the proposed Project would be less than significant.

Operation. Access to the Project site would be provided via three driveways, including two existing driveways on Telegraph Road and on Santa Fe Springs Road, and one proposed cul-de-sac driveway on Hawkins Street. The proposed cul-de-sac driveway would include construction of an approximately 11-foot sidewalk. The proposed sidewalk would connect to the existing sidewalk on Hawkins Street, east of the Project site, on both sides of the street.

Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that currently serve the Project area. Trucks would utilize existing City-designated freight system roads to and from I-605, which would limit potential safety conflicts between passenger vehicles and trucks. Trucks traveling to the Project site would travel via I-605 to Telegraph Road and continue east to Norwalk Boulevard, then north to Hawkins Street, and east to the Project site.

Onsite traffic signing and stripping would also be implemented in conjunction with detailed construction plans with implementation of the Project. Additionally, sight distance at the Project's access points would be reviewed with respect to City standards at the time of final grading, landscape, and street improvement plan reviews. Project frontage improvements and site access points would be constructed to be consistent with the identified roadway classifications and respective cross-sections in accordance with the City of Santa Fe Springs Circulation Element and the City's engineering requirements. Compliance with existing regulations would be ensured through the City's construction permitting process. As a result, impacts related to vehicular circulation design features would be less than significant.

Impact TRA-4 Finding: The Project would not result in inadequate emergency access (DEIR page 5.9-14). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project would not result in inadequate emergency access. Direct access to the proposed Project would be from three driveways, including two existing driveways on Telegraph Road and on Santa Fe Springs Road, and one proposed cul-de-sac driveway on Hawkins Street. Construction activities would occur within the proposed Project site and would not restrict access of emergency vehicles to the site or adjacent areas. The proposed Project is required to design and construct internal access, and size and location of fire suppression facilities (e.g., hydrants and sprinklers) to conform to the 2022 (most recent) California Fire Code standards. The Fire Department would review the development plans prior to approval to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). As such, the proposed Project would not result in inadequate access, and impacts would be less than significant.

5.18 UTILITIES AND SERVICE SYSTEMS

Impact UT-1 Finding: The Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects (DEIR page 5.11-6 through 5.11-23). Impacts would be less than significant.

Facts in Support of Finding:

Water. The Project would construct new 8-inch water lines onsite that would connect to the existing 12-inch water line in Hawkins Street. No additional offsite water infrastructure would be constructed to serve the proposed Project. The new onsite water lines would convey water supplies to the proposed industrial warehouse buildings and landscaping through plumbing/landscaping fixtures that are compliant with the CalGreen Plumbing Code (adopted in the City's Municipal Code as Section 150.001) for efficient use of water.

The construction activities related to the new onsite water infrastructure that would be needed to serve the proposed warehouses are included as part of the Project and would not result in any physical environmental effects beyond those identified in the Draft EIR. Therefore, the proposed Project would not result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, and impacts would be less than significant.

Wastewater. The proposed Project does not currently have any sewer infrastructure onsite. Thus, the proposed Project would install 6-inch sewer laterals in the western portion of the site that would connect to a proposed 10-inch sewer main within Hawkins Street. The proposed 10-inch sewer main would extend approximately 250 feet west of the Project site and connect to the existing 8-inch line in Hawkins Street. Installation of this sewer infrastructure is part of construction of the proposed Project and would not result in any physical environmental effects beyond those described throughout this document.

The construction activities related to the new onsite sewer system and connection to the existing 8-inch sewer main are included as part of the proposed Project and would not result in any physical environmental effects beyond those identified throughout the DEIR. Therefore, the proposed Project would not result in the construction of new sewer facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. As the Project would be required to implement mitigation measures related to construction activities, including those required for installation of the proposed sewer infrastructure, impacts would be less than significant. Thus, with construction related mitigation as detailed under other resource topic areas, impacts related to the proposed expansion and construction of new wastewater facilities would be less than significant.

Stormwater Drainage. The Project would install several inlet drains and roof drains that would connect to two proposed underground infiltration systems. Overflow from both infiltration systems would be conveyed to the existing 51-inch storm drain along the site's eastern boundary, below Hawkins Street. The stormwater infrastructure would capture and treat the 85th percentile of a 24-hour storm event, consistent with the County MS4 Permit requirements. As such, no off-site storm drain improvements would be required for the Project.

Impacts associated with the Project's proposed onsite stormwater drainage infrastructure are included as part of the construction of the Project and would not result in any physical environmental effects beyond those identified throughout the DEIR. As such, there are no environmental impacts that would occur specifically related to the Project's proposed stormwater drainage infrastructure. Therefore, Project impacts due to stormwater drainage infrastructure would be less than significant.

Energy, Natural Gas and Communications Utilities. Implementation of the proposed Project would generate demand for electricity, communication systems, street lighting, and maintenance of public facilities. Electricity would be provided to the Project by Southern California Edison (SCE). Adequate commercial electricity supplies are presently available to meet the incremental increase in demand attributed to the Project. Provision of electricity to the Project site is not anticipated to require or result in the construction of new facilities or the expansion of existing facilities, the construction or relocation of which would cause significant environmental impacts to electricity. Furthermore, the Project buildings would be solar ready in compliance with current Title 24 requirements, which would allow for the future installation of rooftop solar. As such, impacts would be less than significant.

The proposed Project would not connect to existing natural gas infrastructure. As such, the proposed Project is not anticipated to require or result in the construction of new gas facilities or the expansion of existing facilities, and impacts would be less than significant.

Communication systems for the Project would be provided by existing private companies that currently serve the City, including Time Warner, Charter Spectrum, AT&T, and Verizon. Frontier Communications. These existing communications providers are private companies that provide connection to the communication system on an as-needed basis. As such, the proposed Project is not anticipated to require or result in the construction of new communications facilities or the expansion of existing facilities. Impacts would be less than significant.

The Project Applicant would be responsible for coordinating with each utility company to ensure utility improvements occur according to standard construction and operation procedures administered by the California Public Utilities Commission. Excavation would be required to install electric and communication lines that would connect to existing infrastructure near the northern property line. Impacts associated with installation of utility infrastructure and connection to existing infrastructure have been addressed throughout the DEIR as part of evaluation of construction of the proposed Project and have been mitigated to a less than significant level. Therefore, potential impacts associated with utilities, including electricity, natural gas and communication systems would be less than significant.

Impact UT-2 Finding: The Project would have sufficient water supplies available to serve the Project and reasonably foreseeable development during normal, dry, and multiple dry years (DEIR page 5.11-7). Impacts would be less than significant.

Facts in Support of Finding: The City of Santa Fe Springs 2020 Urban Water Management Plan (UWMP), adopted in July 2021, was prepared for the SFSWUA and therefore accounts for the water usage that would be attributed to development of the Project site. As shown in DEIR Table 5.11-4, the SFSWUA has verified that it has the water supplies available during normal, single-dry, and multiple-dry years within a 20-year projection that would meet the projected demand associated with the Project, in addition to existing and planned future uses in the City. Additionally, the 2020 UWMP detailed a 2020 water demand of 223 gallons per capita per day (GPCD) and a baseline target goal of 250 GPCD. However, to conservatively estimate water used for warehouse and office uses for the proposed Project, a water demand rate of .05 gallons per day per square foot was used for warehousing and a water demand rate of .3 gallons per day per square foot was used for office uses. The Project includes development of two warehouse buildings with a combined total building area of 584,678 SF, inclusive of 5,000 SF of office space within each building. Thus, the Project would generate an increased water demand of 31,734 gallons per day or 35.55 AFY, which is within the projected demand and supply for water from 2025 to 2045.

The 2020 UWMP anticipates that the SFSWUA's water supply will increase from 6,346 AFY in 2025 to 6,947 AFY in 2045 (increase of 601 AFY) to meet the SFSWUA's anticipated growth in water demands. The Project's additional demands of 35.55 AFY is less than the 9.5% projected increase in water supply for the City; therefore, the Project's increase in water demand would be within the forecasted growth and would not exceed the projected demand and supply for SFSWUA. Further, the proposed Project would be consistent with existing land use and growth projections that are included in the UWMP projections; and thus, is included in the UWMP projections and SFSWUA would be able to meet all of the anticipated water supply needs.

Based on the data within the UWMP, existing and future water entitlements from groundwater, surface water, and purchased or imported water sources, plus recycling and conservation, would be sufficient to meet the Project's demand at buildout, and would be consistent with forecasted demand for SFSWUA's service area. Thus, there would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years and impacts would be less than significant.

Impact UT-3 Finding: The Project would not result in a determination by the wastewater treatment provider that would serve the Project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments (DEIR page 5.11-10). Impacts would be less than significant.

Facts in Support of Finding: The City provides wastewater collection to the Project area and LACSD provides wastewater treatment to the City via the LCWRP and LBWRP. The Project site would be serviced by LCWRP. Currently, LCWRP has a design capacity of 37.5 MGD and an average flow of 21.7 MGD. According to LACSD's wastewater generation rates, warehouses generate approximately 25 gpd per 1,000 SF and office uses generate approximately 200 gpd per 1,000 SF. Thus, the proposed Project would generate approximately 16,367 gallons of wastewater per day ($574,678 \text{ SF} / 1,000 \text{ SF} \times 25 \text{ gpd} = 14,367 \text{ gpd} + 10,000 \text{ SF} / 1,000 \text{ SF} \times 200 \text{ gpd} = 2,000 \text{ gpd}$).

Under existing conditions, the LCWRP has a remaining treatment capacity of approximately 15.8 MGD (37.5 MGD-21.7 MGD). Implementation of the Project would utilize approximately 0.104 percent of LACSD's excess treatment capacity daily. Thus, LCWRP has ample capacity to serve the proposed Project, and the Project would not create the need for any new or expanded wastewater facility (such as conveyance lines, treatment facilities, or lift stations) to serve the proposed Project. Therefore, impacts related to wastewater treatment capacity would be less than significant.

Impact UT-4 Finding: The Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals (DEIR page 5.11-16). Impacts would be less than significant.

Facts in Support of Finding:

Construction. The proposed Project involves demolition of the existing building onsite, abandonment and removal of existing oil infrastructure, and disposal of contaminated soils. The Project would also generate solid waste from construction packaging, remanent construction materials, and other construction waste. The proposed Project site is located in an area that has historically been used for oil production and thus, the proposed Project site contains contaminated soils and contaminated oil infrastructure. Solid waste and soil export from the site generated from construction of the proposed Project would be disposed of at the Soil Safe of California Facility, located approximately 80 miles from the Project site in the City of Adelanto. The Soil Safe of California Facility has a maximum daily capacity of 5,000 tons and had a maximum daily intake of 1,735.22 tons of waste per day. Thus, the facility had a remaining capacity of 3,264.78 tons per day.

The Project includes the export and disposal of 25,000 cubic yards (CY) (or approximately 37,500 tons) of contaminated soils during construction of the proposed Project. The grading phase is estimated to last 100 days to adhere to the contaminated export quantities as included in the CalEEMod. As such, approximately 375 tons of contaminated waste would be exported and disposed of daily at the Soil Safe of California Facility. Thus, contaminated soil from the Project site during construction would result in approximately 11.5 percent of the Adelanto Soil Safe of California remaining daily capacity. Therefore, the facility would be able to accommodate the contaminated soil waste during construction of the proposed Project. In addition, the proposed Project would produce construction waste in the form of packaging and discarded materials that would be removed from the site. Utilizing a construction waste factor of 3.89 pounds per square foot, construction of the proposed Project would generate approximately 1,137 tons of waste. The 2022 California Green Building Standards Code requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste. Thus, construction activities would generate approximately 739 tons of solid waste to be disposed of at the landfill. Construction

activities would occur over an 18-month period which equates to approximately .02 tons of debris per day (excluding landfill closure days). Solid waste generated by the Project would be disposed of at the Savage Canyon Landfill which is permitted to accept 3,350 tons per day of solid waste. In 2023, the average tonnage received was 270 tons per day. Thus, the facility had a remaining capacity of 3,071 tons per day. Therefore, the Savage Canyon Landfill as well as the Frank Bowerman and Sunshine Canyon Landfills would be able to accommodate the addition of .02 tons of debris per day during construction. Thus, the proposed Project would be served by a facility with sufficient capacity to accommodate the Project's additional tonnage of waste per day during construction. Impacts related to landfill capacity from construction would be less than significant.

Operation. The Air Quality, Energy, and Greenhouse Gas Impact Analysis prepared for the Project uses a default CalEEMod operational solid waste generation factor of 0.94 tons per 1,000 SF per year for industrial uses and 0.93 tons per 1,000 SF per year for general office uses. For a conservative analysis, the highest generation factor of 0.94 per 1,000 SF is assumed; thus, operation of the Project would generate approximately 550 tons of solid waste per year, at least 75 percent of which is required by California law to be recycled, which would reduce the volume of landfilled solid waste to approximately 138 tons per year, or 0.38 tons per day.

As discussed above, solid waste generated by operation of the proposed Project would be disposed of at the Savage Canyon Landfill which is permitted to accept 3,350 tons per day of solid waste. In 2023, the average tonnage received was approximately 270 tons per day with a remaining capacity of 3,071 tons per day. The Project's estimated solid waste from operations of approximately 138 tons per year, or approximately 0.38 tons per day, would represent less than one percent of Savage Canyon Landfill's daily remaining capacity. Similarly, the Project would represent less than one percent of the Frank Bowerman and Sunshine Canyon Landfills' remaining capacity. Thus, the proposed Project would be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs and the Project would not impair the attainment of solid waste reduction goals. Impacts related to landfill capacity from operation would be less than significant.

Impact UT-5 Finding: The Project would comply with federal, State, and local statutes and regulations related to solid waste (DEIR page 5.11-18). No impact would occur.

Facts in Support of Finding: The proposed Project would result in new development that would generate solid waste. All solid waste-generating activities within the County are subject to the requirements set forth in the California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste. Implementation of the proposed Project would be consistent with all State regulations, as ensured through the County's development permitting process. Therefore, the proposed Project would comply with all solid waste statutes and regulations; and impacts would not occur.

Cumulative Impact Finding: The Project would not result in cumulative impacts related to utility and service systems (DEIR pages 5.11-6 to 5.11-23).

Facts in Support of Finding:

Water. Cumulative water supply impacts are considered on a water purveyor basis and are associated with the capacity of the infrastructure system and the adequacy of the water purveyor's infrastructure and primary sources of water that include groundwater, surface water, and purchased or imported water. Potential impacts related to water supply and infrastructure are based on the projections contained within

SFSWUA's 2020 UWMP. The Project would result in an increase in water demand of 35.55 AFY and the existing and future water entitlements from groundwater, surface water, and purchased or imported water sources, plus recycling and conservation, would be sufficient to meet the Project's demand and would be consistent with forecasted demand for SFSWUA's service area. As a result, the Project would not result in a cumulatively considerable increase in water supply demands that would require increased need for water supplies that could be significant. Thus, impacts related to water demand and supply would be less than cumulatively significant.

The construction activities related to the new water infrastructure that would be needed to serve the proposed Project are included as part of the Project and would not result in any physical environmental effects beyond those identified in the DEIR. For example, analysis of construction emissions for excavation and installation of the water infrastructure and related mitigation measures are included in DEIR Sections 5.3, *Air Quality* and 5.7, *Greenhouse Gas Emissions*. As the Project would be required to implement mitigation measures related to construction activities, including those required for installation of the proposed water infrastructure, impacts would be less than significant. Further, the significant and unavoidable impacts that are identified in the DEIR which consist of VMT impacts, are not related to the construction of the proposed water infrastructure. Thus, potential cumulative impacts related to water infrastructure would be less than significant.

Wastewater. Cumulative wastewater infrastructure impacts are considered on a systemwide basis and are associated with the overall capacity of existing and planned infrastructure and based on County growth projections that are utilized by LACSD for facilities planning. The cumulative system evaluated includes the sewer system that serves the Project site and conveys wastewater to the LACSD wastewater treatment system.

With the proposed Project, the sewer system and wastewater treatment plant would have sufficient capacity to handle the increased flows resulting from implementation of the proposed Project. The continued regular assessment and maintenance of the existing sewer system by LACSD would reduce the potential of cumulative development projects to result in a cumulatively substantial increase in wastewater such that new or expanded facilities would be required. Thus, increases in wastewater in the sewer system would result in a less than significant cumulative impact.

Stormwater. The geographic scope for cumulative impacts related to stormwater drainage includes the geographic area served by the existing stormwater infrastructure for the Project area, from capture of runoff through final discharge points. The proposed Project includes installation of two new onsite storm underground filtration systems that would capture and retain stormwater from the site. Overflow from both infiltration systems would be conveyed to the existing 51-inch storm drain along the site's eastern boundary, below Hawkins Street. Additionally, no off-site storm drain improvements would be required for this Project that could be cumulatively significant.

The existing local, state, and regional regulations require development projects to maintain pre-project hydrology, thus no net increase of offsite stormwater flows would occur. RWQCB permit conditions require a hydrology/drainage study to demonstrate that all runoff would be appropriately conveyed and not leave the Project site at rates exceeding pre-project conditions, prior to receipt of necessary permits. As a result, increases of runoff from cumulative projects that could cumulatively combine to impact stormwater drainage capacity would not occur, and cumulative impacts related to drainage infrastructure would be less than significant.

Solid Waste. The geographic scope of the cumulative analysis for landfill capacity is the service area for the Savage Canyon Landfill which serves the Project area. The projections of future landfill capacity based on the entire projected waste stream going to these landfills is used for cumulative impact analysis. The Savage Canyon Landfill has a maximum permitted capacity of 3,350 tons per day and as of 2023 had an

average disposal of 237 tons per day (CalRecycle, 2024). Thus, the facility had an additional capacity of 3,113 tons per day. The Frank Bowerman Landfill is permitted to accept 11,500 tons per day of solid waste and received approximately 8,710.78 tons per day. Thus, the facility had a remaining capacity of 2,789 tons per day (CalRecycle, 2024). The Sunshine Canyon Landfill is permitted to accept 12,100 tons per day of solid waste and received a total of 2,358,927.59 tons which results in an average of 6,463 tons per day. Thus, the facility had a remaining capacity of 5,637 tons per day (CalRecycle, 2024). The construction and operation of the Project would represent a small percentage of Savage Canyon Landfill as well as the Frank Bowerman and Sunshine Canyon Landfills' daily remaining capacity. Therefore, the landfill would have sufficient capacity to serve the Project and the increase in solid waste from full buildout of the Project. Cumulative impacts would be less than significant.

Electric Power, Natural Gas, and Telecommunications. Cumulative dry utilities assessment considers development of the Project in combination with the other development projects within the vicinity of the Project area. Cumulative impacts related to the provision of facilities for electricity, natural gas, and communications systems have been evaluated throughout this DEIR, primarily associated with the emissions resulting from construction. In addition, the Project would connect to existing infrastructure and cumulative impacts related to needs for new utilities that could result in an environmental impact would be less than significant.

5.19 WILDFIRE

Impact WF-1 Finding: The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones and would not substantially impair an adopted emergency response plan or emergency evacuation plan (Initial Study page 67). Impacts would be less than significant.

Facts in Support of Finding: According to the CalFire Hazard Severity Zone Map, the Project is not within a State Responsibility Area (SRA), California Fire Hazard Severity Zone (FHSZ), or Very High Fire Hazard Severity Zone (VHFHSZ). The proposed Project would provide adequate emergency access to the site via two new driveways from Telegraph Road and Santa Fe Springs Road. The driveway on Hawkins Street would be accessible by trucks and the driveway on Telegraph Road would be accessible by passenger vehicles. The proposed Project would also include a 26-foot-wide fire access road throughout the site. Project driveways and internal access would be consistent with the City's permitting procedures to meet the City's design standards, stated in the City of Santa Fe Springs Municipal Code Section 155.244, Property Development Standards to ensure adequate emergency access and evacuation. Telegraph Road and Santa Fe Springs Road are both designated as evacuation routes. The proposed Project does not include any characteristics (e.g., permanent road closures or long-term blocking of road access) that would substantially impair or otherwise conflict with an emergency response plan or emergency evacuation plan. Further, the proposed Project would not obstruct or alter any transportation routes that could be used as evacuation routes during emergency events as the proposed Project would be required through the City's permitting process to implement appropriate measures to facilitate vehicle circulation, as included within construction permits. Thus, implementation of the Project through the City's permitting process would ensure existing regulations are adhered to and potential construction-related emergency access or evacuation impacts would be less than significant.

The proposed Project would also be required to provide fire suppression facilities (e.g., hydrants and sprinklers). The Office of the Fire Marshal and/or Engineering Department would review the development plans as part of the permitting procedures to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). Thus, the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

Impact WF-2 Finding: The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones, and would not expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors, that could exacerbate wildfire risks (Initial Study page 68). No impact would occur.

Facts in Support of Finding: The Project is not within a VHFHSZ. The Project site and adjacent areas are sparsely vegetated, urbanized, and do not contain other major factors that could exacerbate wildfire risks. Implementation of the proposed Project would be required to adhere to the California Fire Code, as adopted by the Santa Fe Springs Fire Department, and would be reviewed by the City's Building Department during the permitting process to ensure that the Project plans meet the fire protection requirements. The Project site does not include any slopes or prevailing winds that would exacerbate fire risks. Therefore, the Project would result in less than significant impacts related to exposure of people or structures to significant risk involving wildland fires.

Impact WF-3 Finding: The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones and would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment (Initial Study page 68). Impacts would be less than significant.

Facts in Support of Finding: The Project site is not within a VHFHSZ. Although the Project includes new driveways for access to the buildings within the Project site and the extension of Hawkins Street, the Project would be compliant with all applicable design standards and regulations. Project design and implementation of utility improvements would be reviewed and approved by the City as part of the Project approval process to ensure the proposed Project is compliant with all applicable design standards and regulations. Therefore, the proposed Project would not include infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities), that would exacerbate fire risk and impacts would be less than significant impact.

Impact WF-4 Finding: The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones and would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes (Initial Study page 68). No impact would occur.

Facts in Support of Finding: The Project is not within a VHFHSZ. In addition, the Project site is located in a flat area that does not contain or is adjacent to large slopes, and the Project would not generate large slopes. Thus, the project would not result in risks related to wildfires or risks related to downslope or downstream flooding or landslides after wildfires.

Wildfire Cumulative Finding: The Project would not result in cumulative impacts to wildfire.

Facts in Support of Finding: Based on the foregoing discussion under Impacts WF-1 through WF-4, the Project would not result in, or contribute to, a cumulatively significant impact to wildfire.

6.0 IMPACTS DETERMINED TO BE LESS THAN SIGNIFICANT WITH MITIGATION

The following potentially significant environmental impacts were analyzed in the Draft EIR and were determined to be less than significant with compliance with existing laws, codes and statutes, regulatory

requirements, and implementation of identified feasible mitigation measures. The City has found in accordance with Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a) (1) that “Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.” which is referred to herein as “Finding 1.”

Where the potential impact can be reduced to less than significant solely through adherence to and implementation of project design features, standard conditions, and plans, programs, or policies, these measures are considered “incorporated into the project,” which mitigate or avoid the potentially significant effect, and in these situations, the City also makes “Finding 1” even though no mitigation measures are required. Based on substantial evidence, the City finds that adoption of the mitigation measures set forth in this section would reduce the identified significant impacts to less than significant levels:

- Air Quality
- Hazards and Hazardous Materials
- Geology and Soils
- Tribal Cultural Resources

6.1 AIR QUALITY

Impact AQ-1 Finding: The Project would not conflict with or obstruct implementation of an applicable air quality plan (DEIR page 5.1-23).

Pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a), the City hereby makes Finding 1 and determines that this impact is less than significant with implementation of Mitigation Measure AQ-1.

Facts in Support of Finding: The Project site has a General Plan land use designation of Industrial and a zoning designation of Heavy Manufacturing (M-2). The Industrial land use designation is intended to provide locations for general industrial, manufacturing, outdoor storage, and logistic activities at a maximum floor area ratio (FAR) of 0.75. The M-2 zone district provides sites for heavy industrial uses, oil and gas drilling, select manufacturing operations, salvage operations, automobile and truck services, and similar compatible uses (Santa Fe Springs Municipal Code Section 155.241). Warehouse uses are permitted within the M-2 zone.

The proposed Project would result in two parcels with two industrial buildings. The proposed Building 1 would be approximately 298,373 SF with a FAR of 0.51 and the proposed Building 2 would be approximately 286,305 SF with a FAR of 0.49. Thus, buildout of the Project site would be within the General Plan buildout assumptions for the proposed Project site. As the Project is consistent with the General Plan land use buildout it would also be consistent with the SCAG’s regional forecast projections, and thus also with the AQMP growth projections. Therefore, the Project is consistent with the SCAQMD 2022 AQMP and would not result in an impact related to Criterion No.1.

Regarding Consistency Criterion No. 2, which evaluates the potential of the proposed Project to increase the frequency or severity of existing air quality violations, an impact related to Consistency Criterion No. 2 would occur if the long-term emissions associated with the proposed Project would exceed SCAQMD’s regional significance thresholds for operation-phase emissions. Further, the Project’s net operational activities would not exceed the numerical thresholds of significance established by the SCAQMD for emissions of any criteria pollutants and impacts would be less than significant. Construction of the proposed Project would result in regional construction-source emissions that would exceed the SCAQMD thresholds of significance for emissions of ROG. However, proposed Mitigation Measure AQ-1 would require the proposed Project to use low ROG paints and would reduce ROG emissions to less than significant levels.

Thus, the proposed Project would be consistent with SCAG's regional growth forecasts, and the proposed Project would not lead to increased regional air quality construction or operational emissions that would exceed thresholds with the inclusion of Mitigation Measure AQ-1. The proposed Project would not result in a conflict with, or obstruct, implementation of the AQMP and impacts would be less than significant after implementation of Mitigation Measure AQ-1.

Impact AQ-2 Finding: The Project would not result in a cumulatively considerable net increase of a criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard (DEIR page 5.1-24).

Pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a), the City hereby makes Finding 1 and determines that this impact is less than significant with implementation of Mitigation Measure AQ-1.

Facts in Support of Finding:

Construction. Pollutant emissions associated with construction would be generated from the following construction activities: (1) site preparation; (2) grading; (3) building construction; (4) architectural coatings and (5) off-site utility and infrastructure improvements. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants. In addition, emissions would result from the import of approximately 126,929 CY of soil and export of approximately 25,000 CY of contaminated soil.

Further, the Project would comply with SCAQMD Rules 403 and 1113, which are included as PPP AQ-1 and PPP AQ-2 and would reduce air contaminants during construction. As shown in DEIR Table 5.1-8, maximum ROG daily emissions during the architectural coating phase are 139.3 pounds/day, exceeding the SCAQMD regional threshold of 75 pounds/day. However, Mitigation Measure AQ-1 requires the proposed Project to use low ROG paints to reduce ROG emissions to less than significant levels, as shown on DEIR Table 5.1-9. Therefore, criteria emissions impacts related to construction of the proposed Project would be less than significant with the implementation of Mitigation Measure AQ-1.

Operation. Implementation of the proposed Project would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with area sources, such as natural gas consumption, landscaping, applications of architectural coatings, and consumer products such as cleaning compounds, detergents, personal care products and garden products. Operation of the proposed Project would include emissions from vehicles traveling to the Project site and from vehicles in the parking lots and loading areas. Area source emissions would occur from operation of two emergency generators and two fire pumps were assumed to operate 1 hour a day for a total of 50 hours per year, which would be regulated by and require a permit from SCAQMD per SCAQMD Rule 1470. Additionally, 58 forklifts were assumed, with 29 Compressed Natural Gas (CNG) and 29 electric operated would be utilized. As shown in DEIR Table 5.1-10, the Project's net operational activities would not exceed the numerical thresholds of significance established by the SCAQMD for emissions of any criteria pollutants and impacts would be less than significant.

Air Quality Cumulative Finding: The Project would not have a cumulatively adverse impact related to air quality (DEIR pages 5.1-37 – 5.1-38).

Facts in Support of Finding: As described in Impact AQ-2 above, emissions from construction would be below regional and localized thresholds for pollutants with implementation of Mitigation Measure AQ-1. Emissions from Project operation would not exceed SCAQMD's thresholds for any criteria pollutant at the

regional or local level after implementation of existing regulations. Therefore, construction and operational emissions would not be cumulatively considerable and would be less than significant.

As discussed in Impact AQ-3, the Project would not cause a significant localized emissions impact to adjacent land uses as a result of Project construction or operation activity. Therefore, impacts related to localized emissions would not be cumulatively considerable and would be less than significant.

Regarding DPM emissions, SCAQMD has applied a 1,000-foot distance from a proposed project to identify other development projects that could contribute to cumulative impacts with the proposed project. The search radius for this Project was extended to 0.25 mile (1,320 feet) to identify potential cumulative sources. Within the 0.25-mile radius around the Project, there is one concurrent industrial development project abutting the Project's south and eastern boundary, sharing the Northwest corner of Telegraph Road and Santa Fe Springs Road. This cumulative project includes four warehouse buildings that would total 318,121 SF and has been approved but has not yet begun construction. A second model run was completed adding the cumulative project in combination with the operational emissions from the Proposed Project.

DEIR Table 5.1-17 shows that the Project has a cumulative operational cancer risk impact of 3.00 in one million that is below the threshold of 10 in one million and a non-cancer risk maximum HI of <0.01 that is below the threshold of 1. Also, DEIR Table 5.1-18 shows that the combination of Project construction and cumulative operational cancer risks would be 2.97 in one million, which is below the threshold of 10 in one million. Therefore, the Project would result in a less than significant cumulative impact.

As discussed under Impact AQ-4, the Project would not expose surrounding uses to objectionable odors. Thus, there is no potential for odors from the Project to combine with odors from surrounding development Projects and expose nearby sensitive receptors to offensive odors. Therefore, the Project would not result in significant cumulative impacts related to odors.

Plans, Programs, and Policies

PPP AQ-1: Rule 403. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 403, which includes the following:

- All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions.
- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the project are watered, with complete coverage of disturbed areas, at least 3 times daily during dry weather; preferably in the mid-morning, afternoon, and after work is done for the day.
- The contractor shall ensure that traffic speeds on unpaved roads and project site areas are reduced to 15 miles per hour or less.

PPP AQ-2: Rule 1113. The Project is required to comply with the provisions of South Coast Air Quality Management District Rule (SCAQMD) Rule 1113. Only "Low-Volatile Organic Compounds" paints (no more than 50 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications shall be used.

PPP AQ-3: Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines. The Project is required to obtain a permit from SCAQMD for the proposed diesel fire pump and would be required to comply with Rule 1470, regulating the use of diesel-fueled internal combustion engines.

PPP AQ-4: Rule 402. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 402. The Project shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

Mitigation Measures

Mitigation Measure AQ-1: Low ROG/VOC Paint (Construction). Construction plans, specifications, and permitting shall require that during construction, the Project shall use “super-compliant” low volatile organic compound (VOC)/reactive organic gases (ROG) paints which have been reformulated to exceed the regulatory VOC limits (i.e., have a lower ROG/VOC content than what is required) put forth by SCAQMD’s Rule 1113 for all architectural coatings. Super-compliant low ROG/VOC paints shall contain no more than 50g/L of ROG/VOC. Prior to issuance of building permits, the City of Santa Fe Springs shall confirm that plans include the following specifications:

- All architectural coatings will be super-compliant low ROG/VOC paints, reduced from the industrial standard of 100 g/L VOC content paint, to a compliant VOC, not exceeding 50 g/L.
- Recycle leftover paint. Take any leftover paint to a household hazardous waste center; do not mix leftover water-based and oil-based paints.
- Keep lids closed on all paint containers when not in use to prevent VOC emissions and excessive odors.
- For water-based paints, clean up with water only. Whenever possible, do not rinse the cleanup water down the drain or pour it directly into the ground or the storm drain. Set aside the can of cleanup water and take it to the hazardous waste center.
- Use compliant low-VOC cleaning solvents to clean paint application equipment.

6.2 GEOLOGY AND SOILS

Impact GEO-6 Finding: The Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature (DEIR page 5.3-4).

Pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a), the City hereby makes Finding 1 and determines that this impact is less than significant with implementation of Mitigation Measure PAL-1.

Facts in Support of Finding: The proposed Project consists of removal of the existing building and well equipment and closure of the wells and the development of the 26.77-acre parcel with two new concrete tilt-up industrial warehouse buildings with a combined total building area of 584,678 SF and a combined total footprint of 564,678 SF. Earthmoving activities related to construction of the proposed Project, including grading and trenching activities, would extend to a depth of 15 feet below the surface. Although the site has been highly disturbed from historic and ongoing well activities, excavation could have the potential to disturb previously unknown paleontological resources. The records search completed as part of the Paleontological Assessment did not reveal any previously recorded fossil localities within the Project site. However, significant fossils have been found within similar sediments in the region. Based on the presence of nearby significant fossil localities, the underlying Pleistocene age alluvial fan deposits mapped at the Project site are considered to have a high potential to yield significant paleontological resources. Therefore, Mitigation Measure PAL-1 is included to require paleontological monitoring during mass grading and

excavation activities of undisturbed alluvial deposits starting at five feet below the surface by a qualified paleontologist to identify, salvage, and recover any potential paleontological resources, such as significant fossil remains. With implementation of Mitigation Measure PAL-1, potential impacts to paleontological resources would be less than significant.

Geology and Soil Cumulative Finding: The Project would result in less than significant cumulative impacts related to Geology and Soils (DEIR at p. 5.3-4).

Pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a), the City hereby makes Finding 1 and determines that these impacts are less than significant with implementation of Mitigation Measure PAL-1.

Facts in Support of Finding: The geographic area of potential cumulative impacts related to paleontological resources includes areas that are underlain by similar geologic units from the same time period. A cumulative impact could occur if development projects incrementally result in the loss of the same types of unique paleontological resources. The City of Santa Fe Springs does not identify the City as a sensitive area for paleontological resources, and therefore did not outline any goals, policies, or implementation programs relative to paleontological resources. However, the Project site is underlain by Pleistocene old alluvial with a high potential to yield significant paleontological resources, based on the presence of nearby significant fossil localities. Thus, the Project site in conjunction with the cumulative projects listed in the DEIR have the potential to be classified as having a low to high paleontological sensitivity. Therefore, all projects within the City of Santa Fe Springs that involve grading or disturbance to site soils (either native or imported from other areas within the region) would have the potential to result in impacts to paleontological resources. However, with incorporation of Mitigation Measure PAL-1 which includes paleontological monitoring, the potential for the proposed Project to result in cumulatively considerable impacts to paleontological resources would be reduced to a less than significant level. Therefore, the potential impacts from the proposed Project would be less than cumulatively considerable with implementation of Mitigation Measure PAL-1.

Mitigation Measures

MM PAL-1: Paleontological Monitoring. Paleontological monitoring shall be required during mass grading and excavation activities in undisturbed alluvial deposits. Furthermore, full time paleontological monitoring shall be required in undisturbed alluvial deposits during excavation and grading activities starting at five feet below the surface. The following guidelines shall be implemented to reduce adverse impacts to paleontological resources to a level below significant. These guidelines follow the City of Santa Fe Springs's guidelines and the recommendations of the Society of Vertebrate Paleontology:

1. All mitigation programs shall be performed by a qualified professional (Project) paleontologist, defined as an individual with a master's or doctorate degree in paleontology or geology who has proven experience in paleontology and who is knowledgeable in professional paleontological procedures and techniques. Fieldwork shall be conducted by a qualified paleontological monitor, defined as an individual who has experience in the collection and salvage of fossil materials. The paleontological monitor shall always work under the direction of a qualified paleontologist.
2. Prior to the issuance of a grading permit, the Project Applicant or developer shall provide written verification to the City of Santa Fe Springs Planning Department, or designee, stating that a professional paleontologist (who meets the Society of Vertebrate Paleontology's definition for qualified profession paleontologist) has been retained to implement the monitoring program.
3. Prior to initiation of any grading, drilling, and/or excavation activities, a preconstruction meeting shall be held and attended by the Project paleontologist, representatives of the grading contractor and subcontractors, the Project Applicant or developer, and a representative of the City of Santa Fe

- Springs. The nature of potential paleontological resources shall be discussed, as well as the protocol to be implemented following the discovery of any fossiliferous materials.
4. Monitoring of mass grading and excavation activities shall be performed by a qualified paleontologist or paleontological monitor. Starting at five feet below the surface, monitoring shall be conducted full-time in areas of grading or excavation in undisturbed soils. If paleontological resources are discovered, the area of the discovery shall be cordoned off and a qualified, project-level paleontologist shall be consulted to determine the significance of the finds.
 5. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface or, if present, are determined by qualified paleontological personnel upon exposure and examination to have a low potential to contain or yield fossil resources.
 6. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor shall have authority to temporarily halt or divert equipment to allow for the removal of abundant or large specimens in a timely manner.
 7. Paleontological salvage during trenching and boring activities is typically from the generated spoils and does not delay the trenching or drilling activities. Fossils shall be collected and placed in cardboard flats or plastic buckets and identified by field number, collector, and date collected. Notes shall be taken on the map location and stratigraphy of the discovery site, and the discovery site will be photographed before it is vacated and the fossils are moved to a safe place.
 8. In accordance with the "Microfossil Salvage" section of the Society of Vertebrate Paleontology Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources 2010 guidelines, bulk sampling and screening of fine-grained sedimentary deposits (including carbonate-rich paleosols) must be performed if the deposits are identified to possess indications of producing fossil "microvertebrates" to test the feasibility of the deposit to yield fossil bones and teeth.
 9. Recovered specimens shall be prepared to a point of identification and permanent preservation.
 10. All fossils shall be deposited in an accredited institution (university or museum) that maintains collections of paleontological materials. All costs of the paleontological monitoring and mitigation program, including any one-time charges by the receiving institution, shall be the responsibility of the developer. Typically, the Los Angeles County Museum of Natural History is the preferred repository for fossils found in Los Angeles County.

6.3 HAZARDS AND HAZARDOUS MATERIALS

Impact HAZ-1 Finding: The Project would not create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials (DEIR page 5.5-15 – 5.5-17).

Pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a), the City hereby makes Finding 1 and determines that this impact is less than significant with implementation of Mitigation Measure HAZ-1 and HAZ-2.

Facts in Support of Finding:

Construction. The proposed construction activities would involve the routine transport, use, and disposal of hazardous materials such as paints, solvents, oils, and grease, during construction activities. In addition, hazardous materials would routinely be needed for fueling and servicing construction equipment on the site. These types of materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by federal and State regulations that are implemented by the City during building permitting for construction activities.

As part of Project construction, on-site oil wells would be abandoned and capped pursuant to the requirements listed under Sections 117.127, 117.129, and 117.130 of the Santa Fe Springs Municipal Code (included as PPP HAZ-5 through PPP HAZ-7). Abandonment would occur pursuant to the oversight and requirements of the California Department of Conservation, Geologic Energy Management Division (CalGEM). In addition, CalGEM inspections and monitoring of all of the existing abandoned wells onsite would occur as necessary pursuant to CCR Title 14 Section 1723.

Construction contractors would also be required to comply with federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous materials. Additionally, construction activities would require a SWPPP, which is mandated by the NPDES General Construction Permit and enforced by the Los Angeles RWQCB. Implementation of the SWPPP, as confirmed through the City's permitting process would limit potentially significant hazards from runoff of contaminated materials during construction to a less than significant level.

Contaminated Soils. The Phase I ESA, Phase II ESA, and Additional Subsurface Investigation Report found TPH and VOCs at levels exceeding the commercial/industrial ESLs, and arsenic levels exceeding background concentrations. In addition, areas of contaminated soils and contaminated oil infrastructure materials may need to be disposed of during the CalGEM well inspection and well closure process. The contaminated soil and oil well materials would be removed and disposed of during construction of the proposed Project. The Project would be required to implement SCAQMD Rule 1166 and SCAQMD Rule 1466 related to excavating and grading soil containing VOC and arsenic, along with the CalOSHA hazardous waste materials handling regulations, and the sections of the California Health and Safety Code, which are described above in the Regulatory Setting. These requirements were developed to protect human health and the environment from the hazards associated with exposure. In addition, due to the potential for other areas of contaminated soils or well materials onsite, a qualified consultant would be required to prepare and implement a Soil Management Plan (SMP), per SCAQMD Rule 1166 (included as PPP HAZ-1) and Los Angeles RWQCB requirements, which is included as Mitigation Measure HAZ-1 to be implemented during earthwork and grading to identify soils that are hazardous and require offsite disposal.

The SMP would require handling of contaminated materials be conducted pursuant to existing SCAQMD, RWQCB, and DTSC standards, soil sampling to ensure non-reusable contaminated soils are removed and that applicable USEPA and/or DTSC Screening Levels are not exceeded, and that a certified hazardous waste hauler remove and transport all hazardous materials, as needed, per California Hazardous Waste Regulations to a landfill permitted by the State to accept hazardous materials. Excavated soil containing hazardous substances would be classified as a hazardous waste if they exhibit the characteristics of ignitability, corrosivity, reactivity, or toxicity (CCR, Title 22, Division 4.5, Chapter 11, Article 3). The SMP would detail hazardous materials excavation and disposal methods and requirements pursuant to the regulation of Title 8 of the California Code of Regulations (CalOSHA) and DTSC that regulates the removal, transportation, and disposal of hazardous waste to protect human health and the environment. The SMP would be submitted to the Santa Fe Springs Building Department prior to the issuance of a grading permit and would be implemented during grading activities.

In addition, a Health and Safety Plan (HSP) would be required to be approved by the Santa Fe Springs Fire Department prior to the issuance of a grading permit or other ground disturbing activities (included as Mitigation Measure HAZ-2) and implemented pursuant to OSHA Safety and Health Standards (29 Code of Federal Regulations [CFR] 1910.120). The HSP would outline health and safety requirements to minimize worker and public exposure to hazardous materials during construction, including vapor, water, and soil contamination. The HSP shall provide compliance with OSHA Safety and Health Standards and provide procedures in the event of release or human contact with hazardous materials during all construction activities. In the event that elevated levels of subsurface gases are encountered during grading and excavation, the

HSP would address potential vapor encroachment from soil contamination or oil well infrastructure within and near the Project site. Gas monitoring devices shall be in place to alert workers in the event elevated gas or other vapor concentrations occur when soil excavation is being performed. Contingency procedures shall be in place in the event that elevated gas concentrations are detected, such as the mandatory use of personal protective equipment, evacuation of the area, and/or increasing ventilation within the immediate work area. Workers shall be trained to identify exposure symptoms and implement alarm response.

Therefore, with implementation of Mitigation Measures HAZ-1 and HAZ-2 and compliance with SCAQMD Rules 1166 and 1466 (included as PPP HAZ-1 and PPP HAZ-2), OSHA Safety and Health Standards (29 Code of Federal Regulations 1910.120), and CalOSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719), that would be verified by the City during Project permitting and inspections, impacts related to transport, use, or disposal of contaminated materials during construction would be less-than-significant.

Operation. The Project site would be developed as a warehouse, operations of which would generally involve limited quantities of hazardous materials such as diesel, automobile gas, automobile oil, cleaning materials, paints, solvents, and pesticides. Normal routine use of these products would not result in a significant hazard to residents or workers in the vicinity of the proposed Project. During proposed Project operations, trucks would travel to and from the Project site to pick up or drop off goods at loading docks. No fueling, maintenance, or other industrial activity would occur on the Project site. Should any future business that occupies the Project site handle acutely hazardous materials (as defined in Section 25500 of California Health and Safety Code, Division 20, Chapter 6.95) the business would require a permit from the City Fire Department as the CUPA. Such businesses are also required to comply with California's Hazardous Materials Release Response Plans and Inventory Law, which requires immediate reporting to the City Fire Department as the CUPA and the State Office of Emergency Services regarding any release or threatened release of a hazardous material, regardless of the amount handled by the business. Any oil or gas spills from the incoming trucks would be reported, cleaned, and disposed of pursuant to City Fire Department requirements.

The routine transport, use, and disposal of acute hazardous materials is not anticipated during operations, and compliance with existing laws and regulations governing routinely used hazard and hazardous materials would reduce potential impacts related to less than significant.

Impact HAZ-2 Finding: The Project would not 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 (DEIR pages 5.5-18-5.5-20). Impacts would be less than significant.

Pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a), the City hereby makes Finding 1 and determines that this impact is less than significant with implementation of Mitigation Measure HAZ-1 and HAZ-2.

Facts in Support of Finding:

Construction. The onsite oil wells would be abandoned and capped during construction, which would be conducted pursuant to Sections 117.127, 117.129, and 117.130 of the Santa Fe Springs Municipal Code (included as PPP HAZ-5 through PPP HAZ-7) and the permitting and inspection requirements of CalGEM. Construction of the proposed Project would involve the limited use and disposal of hazardous materials. Equipment that would be used in construction of the proposed Project has the potential to release gas, oils, greases, solvents, and spills of paint and other finishing substances. However, the amount of hazardous materials on site would be limited, and construction activities would be required to adhere to all applicable regulations regarding hazardous materials storage and handling, as well as to implement construction BMPs

(through implementation of a required SWPPP implemented by City conditions of approval) to prevent a hazardous materials release and to promptly contain and clean up any spills, which would minimize the potential for harmful exposures. Upon compliance with existing laws and regulations, which are mandated by the City through construction permitting, the proposed Project's construction-related impacts would be less than significant.

Contaminated Soils. The Phase I ESA, Phase II ESA, and Additional Subsurface Investigation Report found TPH and VOCs at levels exceeding the commercial/industrial ESLs, and arsenic levels exceeding background concentrations. It is possible that other subsurface areas of contaminated soils exist that could release hazardous vapors. Excavated soil containing hazardous substances and materials would be classified as a hazardous waste if they exhibit the characteristics of ignitability, corrosivity, reactivity, or toxicity (CCR, Title 22, Division 4.5, Chapter 11, Article 3). State and federal laws require detailed planning to ensure that hazardous materials are properly handled, used, stored, and disposed of, and in the event that such materials are accidentally released, to prevent or to mitigate injury to health or the environment. These regulations include, but are not limited to, the federal RCRA, the Occupational Safety and Health Act that is implemented by OSHA, and the HMTA. Additionally, the California Integrated Waste Management Board and the RWQCB specifically address management of hazardous materials and waste handling in their adopted regulations (CCR, Title 14 and CCR, Title 27).

Therefore, due to the identification of TPH, arsenic, and VOCs in onsite soils, preparation and implementation of a SMP (through Mitigation Measure HAZ-1) for excavation, grading, and redevelopment activities pursuant to standard regulatory requirements would be required. The SMP requires handling of contaminated soils be completed pursuant to existing SCAQMD Rules 1166 and 1466 (included as PPP HAZ-1 and PPP HAZ-2) and Los Angeles RWQCB standards and conduction of soils sampling and testing to ensure all contaminated soils within Project boundary are removed. A certified hazardous waste hauler is required to remove and transport all impacted soil and other potentially hazardous materials per California Hazardous Waste Regulations to a local landfill permitted by the State to accept the materials. In addition, an HSP per OSHA requirements is required (through Mitigation Measure HAZ-2) to implement health and safety requirements to minimize worker and public exposure, and provide response to release and exposure, to hazardous materials during construction, including contaminated soils and vapors that could emanate from contaminated soils. Therefore, with implementation of Mitigation Measures HAZ-1 and HAZ-2, compliance with SCAQMD Rules 1166 and 1466 (included as PPP HAZ-1 and HAZ-2), OSHA Safety and Health Standards (29 Code of Federal Regulations 1910.120), CalOSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719), and Municipal Code requirements (included as PPP HAZ-5 through PPP HAZ-7) that would be verified through the City's development permitting process, potential impacts related to significant hazard to the public or environment through the reasonably foreseeable release of contaminated soils or potential vapors from contaminated soils would be less than significant.

Contaminated Groundwater. As shown in the City's General Plan EIR Exhibit 4.9-4 (Contaminated Groundwater Plume), the Project site overlies a contaminated groundwater plume identified as a Superfund site pursuant to CERCLA. The contaminated groundwater plume containing tetrachloroethene (PCE) and trichloroethene (TCE) is under remedial action by the USEPA. However, groundwater in the RWQCB monitoring wells in the Project area in May 2022 had a depth to groundwater ranging from 105.71 to 111.43 feet below the ground surface (Appendix J). As stated in the Preliminary Geotechnical Investigation (Appendix E), groundwater was not encountered during the soil borings, which reached a maximum depth of 51.5 feet below the existing ground surface. Excavation for the proposed Project is anticipated to reach

depths of approximately 15 feet below the ground surface, which would not encroach into groundwater; and there is no potential for contaminated groundwater to be encountered during construction.

Although not anticipated, should Project excavation encounter contaminated water, the proposed Project construction would be required to incorporate contaminated dewatering measures in compliance with the Groundwater Discharge Permit (General NPDES Permit No. CAG994004). This permit would require testing and treatment as necessary for water encountered prior to release to surface waters to ensure that discharges do not contain pollutants. Compliance with the requirements of the Groundwater Discharge Permit, which would be implemented through the Los Angeles RWQCB and the City's development permitting process, would ensure that potential impacts related to a significant hazard to the public or environment through the reasonably foreseeable release of contaminated water would be less than significant.

Asbestos Containing Materials. The existing materials in the Project area date back to a period when many structures were constructed with what are now recognized as hazardous building materials, such as lead and asbestos. Demolition and removal of these older structures could result in the release of hazardous materials. However, asbestos abatement contractors must follow State regulations contained in California Code of Regulations Section 1529 and Sections 341.6 through 341.14 as implemented by SCAQMD Rule 1403 to ensure that asbestos removed during demolition and removal of the existing oil well infrastructure is transported and disposed of at an appropriate facility. The contractor and hauler of the material are required to file a Hazardous Waste Manifest which details the hauling of the material from the site and the disposal of it. Section 19827.5 of the California Health and Safety Code requires that local agencies not issue demolition permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. These requirements are included as PPP HAZ-3 to ensure that the Project applicant submits verification to the City that the appropriate activities related to asbestos have occurred, which would reduce the potential of impacts related to asbestos to a less than significant level.

Lead Based Materials. Lead-based materials may also be located within existing structures in the Project area. The lead exposure guidelines provided by the United States Department of Housing and Urban Development provide regulations related to the handling and disposal of lead-based products. Federal regulations to manage and control exposure to lead-based paint are described in Code of Federal Regulations Title 29, Section 1926.62, and State regulations related to lead are provided in the California Code of Regulations Title 8 Section 1532.1, as implemented by CalOSHA. These regulations cover the demolition, removal, cleanup, transportation, storage and disposal of lead-containing material. The regulations outline the permissible exposure limit, protective measures, monitoring and compliance to ensure the safety of construction workers exposed to lead-based materials. CalOSHA's Lead in Construction Standard requires project applicants to develop and implement a lead compliance plan when lead-based paint would be disturbed during construction or demolition activities. The plan must describe activities that could emit lead, methods for complying with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. In addition, CalOSHA requires 24-hour notification if more than 100 square feet of lead-based paint would be disturbed. These requirements are included as PPP HAZ-4 to ensure that the Project applicant submits verification to the City that the appropriate activities related to lead have occurred, which would reduce the potential of impacts related to lead-based materials to a less-than-significant level.

Operation. Operation of the proposed Project is not anticipated to require regular use of hazardous materials. Limited quantities of diesel, automobile gas, automobile oil may be present on site from the hauling trucks. However, no fueling, maintenance, or other industrial activity would occur on the Project site. The proposed warehouse buildings would utilize limited volumes of cleaners, paints, and other typical office and

consumer products that would not result in a significant hazard. In addition, development of the proposed Project would require a water quality management plan (WQMP) in compliance with the Los Angeles County MS4 Permit (Order No. R4-2012-0175-A01). BMPs would be incorporated in the WQMP that would protect human health and the environment should any accidental spills or releases of hazardous materials occur during operation of the proposed Project. Spills of hazardous materials would be required to be reported, cleaned, and disposed of in compliance with City Fire Department, State, and federal regulations. Therefore, proposed warehouse operations would not result in a significant hazard to the public or the environment through reasonably foreseeable upset and accident involving hazardous material. Impacts related to hazardous materials from operation of the proposed Project would be less than significant.

Methane Hazard Zone. The proposed Project is located within a Methane Hazard Zone and methane gas levels are elevated due to the oil well uses on the site and in the surrounding area. Construction of impervious surfaces can affect methane gas migration, and proposed Project buildings with confined spaces could pose a potential for methane buildup, resulting in a possible hazardous condition. However, the proposed Project would be required to comply with the City's Municipal Code Section 117, et.al. requirements (included as PPP HAZ-8) related to methane gas testing and mitigation systems, which are mandated based on the volume of methane gas identified during onsite testing and design of proposed structures, prior to receipt of building permits. The Municipal Code prescribes the minimum methane mitigation systems depending on the concentration and pressure of the methane present at the site. Each component of the methane systems would be required to be constructed of an approved material and would be required to be installed in accordance with the Methane Mitigation Standards, as reviewed and approved by the City's Fire Department, that would reduce potential impacts to a less than significant level. These vapor barriers would also be effective for mitigation of any VOCs that might be present. Thus, compliance with regulatory requirements would reduce the potential for exposure of people to substantial volumes of methane gas and VOCs that could result in a significant hazard to the public or environment. Therefore, impacts would be less than significant.

Plans, Programs, and Policies

PPP HAZ-1: SCAQMD Rule 1166. Prior to issuance of grading or excavation permits, the Project applicant shall submit verification to the City Building and Safety Division that it has applied for and obtained a SCAQMD Rule 1166 Contaminated Soil Mitigation Plan that includes but is not limited to the following, as required by SCAQMD. Monitor for VOC contamination at least once every 15 minutes commencing at the beginning of excavation or grading and record all VOC concentration readings. Handling VOC-contaminated soil at or from an excavation or grading site shall segregate VOC-contaminated stockpiles from non-VOC contaminated stockpiles such that mixing of the stockpiles does not take place. VOC-contaminated soil stockpiles shall be sprayed with water and/or approved vapor suppressant and cover them with plastic sheeting for all periods of inactivity lasting more than one hour. A daily visual inspection shall be conducted of all covered VOC contaminated soil stockpiles to ensure the integrity of the plastic covered surfaces. Contaminated soil shall be treated or removed from an excavation or grading site within 30 days from the time of excavation.

PPP HAZ-2: SCAQMD Rule 1466. Prior to issuance of grading or excavation permits for soil that contains the potential to contain applicable toxic air contaminants that have been identified as contaminant(s) of concern per SCAQMD Rule 1466, the Project applicant shall conduct continuous direct-reading near real-time ambient monitoring of PM₁₀. If the PM₁₀ concentration exceeds 25 micrograms per cubic meter, per SCAQMD Rule 1466 measurement requirements, the owner or operator shall cease on-site earth-moving activities, apply dust suppressant to fugitive dust sources, or implement other dust control measures as necessary, per SCAQMD Rule 1466 specifications, until the PM₁₀ concentration is equal to or less than 25 micrograms per cubic meter averaged over 30 minutes.

PPP HAZ-3: SCAQMD Rule 1403. Prior to issuance of demolition, grading, or excavation permits, the Project applicant shall submit verification to the City Building and Safety Division that an asbestos survey has been conducted at all existing buildings located on the Project site. If asbestos is found, the Project applicant shall follow all procedural requirements and regulations of South Coast Air Quality Management District Rule (SCAQMD) 1403. Rule 1403 regulations require that the following actions be taken: notification of SCAQMD prior to construction activity, asbestos removal in accordance with prescribed procedures, placement of collected asbestos in leak-tight containers or wrapping, and proper disposal.

PPP HAZ-4: Lead. Prior to issuance of demolition, grading, or excavation permits, the Project applicant shall submit verification to the City Building and Safety Division that a lead-based paint survey has been conducted at all existing building structures located on the Project site. If lead-based paint is found, the Project applicant shall follow all procedural requirements and regulations for proper removal and disposal of the lead-based paint. Cal-OSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, CCR Title 8, Section 1532.1 provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead.

PPP HAZ-5: Well Abandonment. Pursuant to Municipal Code Section 117.127, *Criteria for Well Abandonment*, a well shall be considered properly abandoned for the purpose of this section when all of the following events have occurred:

- A. If applicable, any holes associated with a well have been filled with native earth and compacted to a 90% compaction factor.
- B. The derrick and all appurtenant equipment thereto have been removed from the drill site. All drilling and production equipment, tanks, towers and other surface installations used in connection with the well shall have been removed from the drill site or tank farm site. The cleaning of the site shall comply with the regulations of Division of Oil, Gas and Geothermal Resources (DOGGR).
- C. All buried pipelines shall have been excavated and removed or, if approved by the Fire Chief, purged of all hydrocarbon substances and filled with water-base drilling mud or other inert materials. The surface of the land, insofar as practicable, has been left in a neat and orderly condition.
- D. The depth from ground level to the top of the well casing shall be a minimum of five feet and a maximum of 10 feet unless a different cut-off depth is approved by DOGGR.
- E. A permit to abandon the well shall be obtained from the Fire Department prior to abandonment. The Fire Chief or his designee shall witness the pouring of the last 25 feet of the cement well plug and the welding of a plate across the top of the well. The plate on the top of the abandoned well shall conform to current DOGGR requirements and include the date of abandonment. The Fire Chief or his designee shall inspect and certify in writing that the well has been properly abandoned in accordance with provisions of this section.
- F. A copy of the DOGGR Report of Well Abandonment or other final determination has been provided to the Fire Chief and the Director.

PPP HAZ-6: Prior to New Construction. Pursuant to Municipal Code Section 117.129, *Requirements Prior to New Construction*, prior to the issuance by the City of a building or grading permit for property upon which there are any active or abandoned wells, the applicant shall complete all of the following:

- A. Obtain a construction site well review from DOGGR.
- B. Conduct a soils gas study in accordance with § 117.131.
- C. Obtain a permit from the Fire Department to expose all former wells, survey their location and test each well for gas or fluid leaks under the supervision of an oil and gas professional authorized by the Fire Department. Conduct this leak test and submit results to the Fire Department.
- D. Provide a well access site map to the Planning Department for approval. The site map shall include all of the following:

- Detailed location of each well including the depth from ground level to the top of the well casing of each abandoned well in relation to finished grade.
 - Demonstrate how vehicles and abandonment equipment will access each well from the public right-of-way.
 - Demonstrate that adequate setbacks will be provided for setting up abandonment equipment around each well.
- E. Obtain a permit from the Fire Department for the installation of a vent cone and related equipment for all abandoned wells located below or in close proximity to the proposed new construction.
- F. Agree to implement all mitigation measures required by the Fire Chief including, but not limited to, installation and maintenance of methane barriers, vents/blowers, alarms and the like (collectively, "Methane Mitigation Systems").
- G. If applicant performs a leak test pursuant to § 117.129(C) and the test indicates the well is leaking, applicant shall abandon or reabandon the well pursuant to § 117.127.
- H. File an indemnity bond pursuant to Cal. Public Resources Code §§ 3204 or 3205.
- I. Execute and record against the property an environmental release and indemnity agreement providing that the property owner and his assignees, release, indemnify and hold harmless the city against any and all claims, obligations, and causes of action of any kind or nature whatsoever, known or unknown, for personal injury or death, property damage, economic loss, and fines and penalties. The City Attorney shall approve the form of the disclosure and indemnity agreement.

PPP HAZ-7: Reabandon Wells. Pursuant to Municipal Code Section 117.130, *Abandoned Wells That Do Not Meet Current DOGGR Standards*, if DOGGR determines that a well has not been abandoned to its current standards, the Director, in consultation with the Fire Chief, may conditionally authorize issuance of a building and/or grading permit for a property if the following conditions are met:

- (A) The applicant meets the requirements of § 117.129(A) through (I). For construction over an abandoned well, § 117.129(D) may be waived by the Director in consultation with the Fire Chief.
- (B) The applicant shall obtain, at his sole cost, a certified report from a California-licensed professional engineer or geologist qualified and experienced with oil well abandonment indicating that it is not reasonable or feasible for the applicant to do additional well abandonment work in order to meet current DOGGR abandonment standards. The engineer's or geologist's report shall:
- (1) Demonstrate that, as abandoned, the well will not pose any significant risk to public health, safety, welfare or the environment.
 - (2) Demonstrate that (a) the well is a safe distance from any existing or proposed structures or improvements; and (b) in the event the Fire Department or DOGGR orders reabandonment of the well, the applicant has adequate access to the well. This requirement does not apply to construction over an abandoned well.
 - (3) Provide abandonment or mitigation measures that would be necessary to mitigate any long-term significant risks once the site is developed.
- (C) The applicant agrees to implement all methane mitigation systems required by the Fire Chief. The Fire Chief, in conjunction with the Director, is authorized to obtain expert analysis in order to determine whether the conditions identified in § 117.130 have been met. The cost of such expert analysis shall be paid by the applicant.

PPP HAZ-8: Methane Mitigation System. Pursuant to Municipal Code Section 117.131, *Requirements for a Soils Gas Study or Methane Mitigation System*, a soil gas investigation to identify the concentration of methane gas in the subsurface is required for sites within 500 feet of an existing or abandoned oil well. Based on the results of the soils gas monitoring or on information available on surrounding properties, property owners shall implement any other mitigation measures as required by the Fire Chief. Methane mitigation systems shall be required for any regulated construction if any of the following apply:

- (1) The initial monitoring reveals methane levels in excess of 25% of the lower explosive limit (i.e., 1.25% by volume in air or 12,500 ppm/v).
- (2) The regulated construction will impede access to an abandoned oil well.
- (3) Quarterly or annual monitoring reveals methane levels greater than 25% of the lower explosive limit (i.e., 1.25% by volume in air or 12,500 ppm/v).

The design of a methane mitigation system for property within the methane zone shall be in accordance with the requirements of the Los Angeles County Department of Public Works and City Fire Department and shall include permanent monitoring vapor probes above and below the barrier unless an alternative design is approved by the Fire Chief. Where gas detection systems are used, they shall be designed by and installed under the supervision of registered engineers. The design and installation shall be inspected and approved by the Fire Department.

In extraordinary cases, for example, where methane in excess of 25% of the lower explosive limit (i.e., 1.25% by volume in air or 12,500 ppm/v) can be demonstrated to be a non-repetitive incident, a registered petroleum engineer or other qualified persons may request a waiver by the Fire Chief for the installation of a methane mitigation system. The granting of the waiver shall be at the discretion of the Fire Chief.

PPP HAZ-9: Hazardous Wastes. Pursuant to Municipal Code Section 152.33, *Extremely Hazardous Wastes*, any storage, treatment, disposal, or transportation of extremely hazardous waste as defined in Cal. Health and Safety Code § 25115, by the facility owner/operator shall be reported to the Director of Planning and Fire Chief at least 48 hours prior to such storage, treatment, disposal, or transportation.

PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Building and Safety Department with evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

PPP HYD-2: LID. Prior to the issuance of any grading permits, a completed Low Impact Development Plan (LID) shall be submitted to and approved by the City's Public Works Department. The LID shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.

Mitigation Measures

Mitigation Measure HAZ-1: Soil Management Plan (SMP). Prior to issuance of a grading or excavation permit a SMP shall be approved by the City of Santa Fe Springs Fire Department as the Certified Unified Program Agency (CUPA), with responsibility for implementing federal and State laws and regulations pertaining to hazardous materials management. The SMP shall implement SCAQMD Rule 1166, RWQCB water quality regulations, and the following measures as deemed appropriate by the City of Santa Fe Springs Fire Department for each Project grading or excavation permit.

- 1) **Preparation:** The following activities will be performed prior to the start of earth moving activities:
 - **Agency Notification:** At least 48 hours before the date of earth moving activities, the contact information for the environmental consulting project manager (a State of California Professional Geologist or Professional Engineer or supervised by one) will be provided to the CUPA via email

along with a notification of the date that earthmoving operations and/or other preparation for redevelopment will begin.

- **SMP Training:** The environmental consultant will provide a training session for all earth moving onsite personnel including superintendents. The training will ensure that all onsite personnel are familiar with the requirements of the SMP in an on-Site, pre-grading kick-off meeting.
- **PID Rental:** A photo-ionization detector (PID) that shall be used to read concentrations of volatile organic compounds (VOCs) will be utilized by the environmental professional responsible for SCAQMD Rule 1166 permit monitoring.

- 2) **Field Identification Procedures:** Prior to grading or other earth moving activities, environmental consulting personnel shall train the earth moving superintendent in the recognition of impacted soil and the notifications required. When impacted soil is observed, the superintendent will notify the environmental consultant to visit the site to inspect the area. The superintendent shall also take digital photographs for email delivery to the environmental consultant. The superintendent shall communicate details regarding the potential environmental issue via telephone conversation immediately as practicable but not later than the end of the business day the potential environmental issue is encountered. Excavation in the area of VOC impacted soils will cease until the environmental professional mobilizes to the Site to further inspect.

The pre-field training of earth moving personnel shall emphasize that any of the following observed conditions on the site will require notification to the superintendent (who will then communicate these conditions to the environmental consulting contact):

- **Discolored Soil:** Observation of soil that is discolored with black, dark, multi-colored, white, or other discoloration when compared to the surrounding material. This condition may be indicative of potential chemical impact by asbestos, metals-containing compounds and/or petroleum hydrocarbon compounds and is especially effective for identification of heavier end hydrocarbons such as those found in crude oil.
- **Odorous Soil:** Soil encountered that has a noticeable odor of anything other than a musty odor which is typically a result of mold (biological). This condition is indicative of potential chemical impact by volatiles and petroleum hydrocarbon compounds and is especially effective for identification of volatile compounds such as light end hydrocarbons or other crude oil components.
- **PID Use:** Training shall include the proper use, calibration, startup, and shutdown of a PID.
- **PID Readings Sustained over 50 parts per million (ppm) for more than 10 seconds at 3 inches above the soil surface:** If soil such as that described in 1 and 2 above is encountered, the superintendent shall take a reading with the PID and notify the environmental consultant of the location, soil observations, and PID readings. The environmental consultant may choose to inspect the area and compare the location with previous data to determine whether this is a new or known area. If readings over 50 ppm are sustained for more than 10 seconds 3 inches above the soil surface, this condition is indicative of potential chemical impact by VOCs. This field screening method will identify potential environmental issues related to diesel, gasoline, and volatile organic compounds.
- **Encounter of a previously unidentified feature:** Any underground features such as underground pipes, tanks (USTs), or clarifiers that are encountered (which, upon observation by the environmental consultant, is deemed to have potentially been used to contain liquids or exhibits staining) will require removal, soil sampling, sample analysis, and evaluation of analytical results by the oversight environmental professional pursuant to a permit from the Santa Fe Springs Fire Department.

- 3) **Procedures Following Identification of a Potential Environmental Issue:** If discolored and/or odorous or soil with PID readings exceeding a sustained reading of 50 ppm is encountered, the following procedure shall be followed:

- a. The earth moving superintendent will inform the environmental consultant project manager as soon as possible but not later than the end of the business day the potentially impacted soil is encountered.

- b. Cease excavation in area of impact to allow environmental professional to mobilize to the site to observe the condition and oversee the excavation of odorous and discolored soil for separate stockpiling with pile identified as to the location of the area it came from. Stockpiles will be placed on plastic sheeting to protect underlying soil. The stockpile will be sampled according to the protocols in the next section and covered with plastic sheeting pending analytical results.
- c. The environmental consultant personnel may visit the site to observe the potentially impacted soil and collect samples if necessary. If necessary, the environmental consultant personnel will supervise removal of the soil, agency notifications, and sample collection.
- d. The environmental consultant will perform the following:
 - a) Observation of the nature of and the condition of the area where the potentially impacted soil was found and comparison to site characterization and remediation data.
 - b) One sample of potentially impacted soil per 250 cubic yards of soil removed. Samples used to characterize soil stockpiles may be composited.
 - c) Soil samples from each impacted area will be analyzed for the following:
 - i. TPH – 8015M
 - ii. VOCs – 8260
 - iii. Title 22 metals
 - iv. Samples from areas of unknown sources of TPH may also be analyzed for PCBs by EPA Method 8082 and for SVOCs by EPA Method 8270.
 - e. As necessary, stockpiled soil that exceeds screening thresholds and cannot remain onsite shall be disposed of offsite according to all applicable regulations through oversight by the CUPA (Santa Fe Springs Fire Department) as documented in writing.
 - f. Results of environmental oversight and performing the procedures of the SMP, including soil sampling results and analysis as well as the final disposition of sampled soils shall be provided in writing to the CUPA prior to issuance of additional construction permits.

Mitigation Measure HAZ-2: Health and Safety Plan (HSP). Prior to ground-disturbing activities, including well abandonment, grading, trenching, excavation, or structure demolition a HSP shall be approved by the City of Santa Fe Springs Fire Department as the Certified Unified Program Agency (CUPA), with responsibility for implementing federal and State laws and regulations pertaining to hazardous materials management. The Project Applicant and/or the construction contractor(s) shall retain a qualified professional to prepare a site-specific HSP in accordance with federal Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1910.120) and California OSHA regulations (8 CCR Section 5192). HSPs shall be a condition of the well abandonment, grading, construction, and/or demolition permit(s).

The HSP shall be implemented by the construction contractor to protect construction workers, the public, and the environment during all ground-disturbing activities from exposure to hazardous materials, including vapor and soil contamination. The HSP shall include, but not be limited to, the following elements:

- Designation of a trained, experienced site safety and health supervisor who has the responsibility and authority to develop and implement the site HSP.
- The HSP shall provide compliance with OSHA Safety and Health Standards and provide procedures in the event of release or human contact with hazardous materials during all construction activities.
- A summary of all potential risks to construction workers and maximum exposure limits for all known and reasonably foreseeable site chemicals.
- Specified personal protective equipment and decontamination procedures, if needed.
- Gas monitoring devices – A 4 or 5 gas meter capable of measuring methane, hydrogen sulfide, oxygen and carbon monoxide shall be on Site during all work in place pursuant to the Soil Management Plan (SMP) (Mitigation Measure HAZ-1) to alert workers in the event elevated gas or other vapor concentrations occur when soil excavation is being performed.
- In the event that elevated levels of subsurface gases are encountered during grading and excavation, the HSP shall address potential vapor encroachment from soil contamination or oil well infrastructure

within and near the Project site and the environmental professional will be notified to respond to the Site.

- A requirement specifying that any site worker who identifies hazardous materials has the authority to stop work and notify the site safety and health supervisor.
- Contingency procedures shall be in place in the event that elevated gas concentrations are detected, such as the mandatory use of personal protective equipment, evacuation of the area, and/or increasing ventilation within the immediate work area. Workers shall be trained to identify exposure symptoms and implement alarm response.
- Emergency procedures, including the route to the nearest hospital.
- The requirement to prepare documentation showing that HSP measures have been implemented during construction (e.g., tailgate safety meeting notes with signup sheet for attendees, soils gas testing data).

6.4 TRIBAL CULTURAL RESOURCES

Impact TCR-1i and 1ii Finding: The Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is (i) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k) OR (ii) a resource determined by the lead agency, in its discretion and supported by substantial evidence (DEIR page 5.10-5).

Pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a), the City hereby makes Finding 1 and determines that this impact would be less than significant with implementation of PPP CUL-1, PPP CUL-2, Mitigation Measures TCR-1, TCR-2, and TCR-3.

Facts in Support of Finding: On January 8, 2024, an SLF search and a list of Native American tribes who may have knowledge of cultural resources in the Project area were requested from the NAHC. On February 5, 2024, the NAHC responded with a list of Native American tribes and indicated that the SLF search yielded negative results for known TCRs or sacred lands within a 1-mile radius of the Project site. The City sent notices regarding the Project in May 2024 to the Native American tribes provided by the NAHC.

One response was received from the Gabrieleno Band of Mission Indians-Kizh Nation (Kizh Nation) on June 12, 2024, requesting consultation on the Project. The City contacted Kizh Nation on June 25, 2024 to begin consultation. Thereafter, the Kizh Nation provided a list of mitigation measures to be included in the Project on September 3, 2024. Although there was no substantial evidence provided indicating that TCRs, as defined in Public Resources Code Section 21074, are present on the Project site or have been found previously on the Project site, the Project site's location is in an area where Native American tribes are known to have a cultural affiliation. As such, there is the possibility that archaeological resources, including TCRs, could be encountered during ground disturbing construction activities. As such, Mitigation Measures TCR-1, TCR-2, and TCR-3, have been incorporated into the Project.

Based on literature review (i.e., records check and archival research) and pedestrian surveys, no prehistoric resource sites or isolates—including a historic TCR as defined by PRC Section 5020.1(k)—have been identified within the Project site. Additionally, the potential for encountering archaeological resources including TCRs within the Project site is considered low due to the long-term disturbance of the site including clearing, grading, and the steady use for oil well drilling and extraction. However, construction of the proposed Project would include earthmoving activities to depths of 15 feet below the ground surface, which

have the potential to disturb previously unknown tribal cultural resources. As a result, Mitigation Measure TCR-2 has been included.

The Project site also does not contain known resources that are significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. However, Mitigation Measure TCR-1 has been included to have a Native American monitor be present for all ground disturbing activities to monitor for inadvertent discoveries during ground disturbing activities.

The Project would also include implementation of PPP CUL-1, in compliance with State Health and Safety Code Section 7050.5, to ensure proper procedures are taken should human remains be unearthed and PPP CUL-2 should archaeological resources be unearthed.

Therefore, with implementation of Mitigation Measures TCR-1, TCR-2, TCR-3, and applicable regulations, potential impacts to TCRs would be less than significant.

Tribal Cultural Resources Cumulative Impact Finding: The Project would not result in cumulative impacts to tribal cultural resources. (DEIR page 5.10-6)

Pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a), the City hereby makes Finding 1 and determines that these impacts would be less than significant with implementation of PPP CUL-1, PPP CUL-2, and Mitigation Measures TCR-1, TCR-2, and TCR-3.

Facts in Support of Finding: The cumulative study area for tribal cultural resources includes the City of Santa Fe Springs, which contains the same general tribal historic setting. Other projects throughout the City that would involve ground disturbances could reveal buried tribal cultural resources.

Cumulative impacts to tribal cultural resources would be reduced by compliance with applicable regulations and consultations required by AB 52. As described above, the Project area is not known to contain tribal cultural resources; however, Mitigation Measures TCR-1 through TCR-3 would be implemented to ensure that impacts would not occur in the case of an inadvertent discovery of a potential tribal cultural resource. These mitigation measures ensure that the Project would not contribute to a cumulative loss of tribal cultural resources. Therefore, potential cumulative impacts would be less than significant.

Plans, Programs, and Policies

PPP CUL-1: Human Remains. Should human remains or funerary objects be discovered during Project construction, the Project will be required to comply with State Health and Safety Code Section 7050.5, which states that no further disturbance may occur in the vicinity of the body until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine the identity of and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD must complete the inspection within 48 hours of notification by the NAHC.

PPP CUL-2: Inadvertent Discovery. In the event that potential archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the City or County List of Qualified Archaeologists has evaluated the find to determine whether the find constitutes a "unique archaeological resource," as defined in Section 21083.2(g) of the California Public Resources Code. Any resources identified shall be treated in accordance with

California Public Resources Code Section 21083.2(g). If the discovered resource(s) appears Native American in origin, a Native American Monitor shall be contacted to issuance of any permits for ground-disturbing activities that include the excavation of soils (including as grading, excavation, and trenching), the City shall ensure that all Project grading and construction plans and specifications include requirement to halt construction activity and contact an archaeologist.

Mitigation Measures

TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

- a) The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- b) A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
- c) The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to Kizh Nation. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the tribe.
- d) On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to Kizh Nation from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh Nation monitor and/or Kizh Nation archaeologist. Kizh Nation will recover and retain all discovered TCRs in the form and/or manner the tribe deems appropriate, in the tribe’s sole discretion, and for any purpose the tribe deems appropriate, including for educational, cultural and/or historic purposes.

TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

- a) Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.
- b) If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).
- c) Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).
- d) Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.
- e) Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

7.0 IMPACTS DETERMINED TO BE SIGNIFICANT AND UNAVOIDABLE

This section identifies the significant and unavoidable impacts that require a statement of overriding considerations to be issued by the City, pursuant to CEQA Guidelines Section 15093, if the Project is approved.

Public Resources Code section 21002 states that “it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects. The Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.”

Section 15364 of the CEQA Guidelines defines “feasible” as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.”

The City hereby finds that, despite the incorporation of feasible measures outlined in the Final EIR, the following impacts cannot be fully mitigated to a less than significant level.

7.1 TRANSPORTATION

Impact TRA-2 Finding: The Project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (B) regarding vehicle miles traveled (DEIR page 5.9-11). Impacts would be significant and unavoidable.

Facts in Support of Finding: CEQA Guidelines Section 15064.3(b) focuses on determining the significance of VMT-related transportation impacts. The City of Santa Fe Springs VMT Screening Criteria contains the following screening thresholds to assess whether a project has the potential to result in an impact and further VMT analysis is required. If the Project meets any of the following screening thresholds, then the VMT impact of the Project is considered less than significant and further VMT analysis is not required.

Project Size Screening: Projects that generate fewer than 110 daily net new vehicle trips are presumed to have a less-than-significant impact, per the City's guidelines. As shown in Table 5.9-1, the proposed Project would generate 975 daily passenger vehicle trips. As such, the proposed Project would not satisfy the requirements of Screening Criteria 1.

Locally Serving Retail Screening: Projects that propose locally serving retail uses that are 50,000 square feet or less are presumed to have a less-than-significant impact. The Project does not propose a local serving retail use. As such, the project would not satisfy the requirements of Screening Criteria 2.

Project Located in a Low VMT Area Screening: Residential or office (Commercial or Light Industrial) projects located in a low VMT generating area may be presumed to have a less-than-significant impact. As shown in Figure 4 of the City Guidelines, the Project site is not located in a low VMT area. Therefore, the Project would not satisfy the requirements of Screening Criteria 3.

Affordable Housing Projects Screening: Projects that provide affordable housing units are presumed to have a less-than-significant impact. The proposed Project does not provide affordable housing units. As such, the proposed Project would not satisfy the requirements of Screening Criteria 5.

Transportation Facilities Screening: Transportation projects that promote non-auto travel, improve safety, or improve traffic operations at current bottlenecks, such as transit, bicycle and pedestrian facilities, intersection traffic control (e.g., traffic signals or roundabouts), or widening at intersections to provide new turn lanes are presumed to have a less-than-significant impact. The proposed Project is not a transportation project. As such, the proposed Project would not satisfy the requirements of Screening Criteria 6.

Since the Project does not meet the screening criteria, a more comprehensive VMT analysis was prepared, which determined that the proposed Project would have a significant impact on HBW VMT per employee when compared to the baseline conditions. As shown in DEIR Table 5.9-3, the projected HBW VMT per employee for the Project would be 26.5 in 2024, which is 44.9 percent above the threshold of 18.3 VMT per employee. Therefore, the Project would result in a significant VMT impact.

The 2021 California Air Pollution Control Officers Association (CAPCOA) guidelines identify a total of 34 transportation-related GHG emission reduction measures with 32 measures that reduce VMT as a quantified co-benefit. A majority of the measures, based on their description and their measure scale, are not applicable to the proposed uses (warehouse with 10 percent light manufacturing). Six of the 34 VMT reduction measures were determined to be applicable to the proposed Project.

Mitigation Measure TRA-1 incorporates CAPCOA Measures T-5 through T-11. Mitigation Measure T-1 requires mandatory implementation of a commute trip reduction program that includes monitoring (CAPCOA Measure T-6). The commute trip reduction program would include all other elements described for the voluntary program (CAPCOA Measure T-5) including: implementation of a commute trip reduction marketing (CAPCOA Measure T-7), providing a rideshare program (CAPCOA Measure T-8), implementation of a subsidized or discounted transit program (CAPCOA Measure T-8), providing end-of-trip bicycle facilities (CAPCOA Measure T-10), and providing employer-sponsored vanpool(s) (CAPCOA Measure T-7).

With compliance with existing rules and implementation of CAPCOA measures T-5 through T-11 that are included as Mitigation Measure T-1, the HBW VMT per employee of the Project would be reduced by 23.8 percent. Despite this reduction, the Project VMT would continue to exceed the baseline threshold by 21.1 percent. Therefore, the Project VMT impacts would be significant and unavoidable.

Transportation Cumulative Impact Finding: The Project would result in cumulatively considerable impacts to transportation (DEIR page 5.9-14). Impacts would be significant and unavoidable.

Facts in Support of Finding:

Conflict with Circulation Plan or Program. The cumulative traffic study area for the proposed Project includes the City of Santa Fe Springs and is based on projections of land use and development from the General Plan, as the proposed Project is consistent with the General Plan land use designation, zoning designation, and allowable buildout. The evaluation of Impact TRA-1 concluded that the proposed Project would not result in significant impacts related to transportation or policies addressing the circulation system. The proposed Project was determined to not impact transit and roadway facilities. The freight system roads usage and roadway operations of the Project were determined to not conflict with the City's circulation system. Cumulative development in the City would be subject to site-specific reviews, including reviews of sidewalk, bike lane, and bus stop designs that would reduce the potential for cumulatively considerable impacts. As the Project would result in a less than significant impact and cumulative projects require compliance with existing circulation regulations, potential impacts from the Project would not cumulatively combine with other projects to result in cumulatively considerable impacts. Thus, cumulative impacts related to conflict with circulation plans and programs would be less than significant.

Vehicle Miles Traveled. The cumulative traffic study area for the proposed Project includes the City of Santa Fe Springs, and the information utilized in the analysis of VMT are the City's land use data and the projections contained within the SCAG Model. The Project would have a significant impact on HBW VMT per employee when compared to the baseline conditions. The projected HBW VMT per employee for the Project would be 26.5 in 2024 and 26.7 in 2045. This is 44.9 percent above the baseline threshold and 45.9 percent above the cumulative threshold. Although the Project would be required to implement feasible mitigation, the VMT would remain 21 percent above thresholds. Therefore, the Project would result in a significant and unavoidable project level and cumulative impact related to VMT.

Design and Roadway Hazards. The cumulative traffic study area for the proposed Project includes the City of Santa Fe Springs and is based on projections of land use and development from the General Plan, as the proposed Project is consistent with the General Plan land use designation, zoning designation, and allowable buildout. The evaluation of Impact TRA-3 concluded that the proposed Project would not result in significant impacts related to incompatible uses or hazards due to roadway design. The proposed circulation layout would be required to be installed in conformance with City design standards to ensure that no potentially hazardous design features or inadequate emergency access would be introduced by the Project that could combine with potential hazards from other projects. In addition, cumulative development in the City and surrounding jurisdictions would be subject to site-specific reviews, including reviews by police and fire protection authorities, and the City of Santa Fe Springs' own traffic safety engineers, that would reduce the potential of cumulatively considerable design hazards. Therefore, potential impacts related to circulation design features would not occur from the Project and would not combine with hazards from other projects. Thus, cumulative impacts would be less than significant.

Mitigation Measures

Mitigation Measure TRA-1 (CAPCOA Measures T-5 through T-11): Commute Trip Reduction Program.

The City's operational and occupancy permitting shall include that the tenant shall be required (by contract specifications) to implement a Commute Trip Reduction (CTR) Program to encourage employees to carpool, take transit, and bike to work. 100% of employees shall be eligible to participate in all identified measures of the CTR Program. The mandatory CTR Program shall include all other elements (i.e., CAPCOA Measures

T-7 through T-11) described for the voluntary program (Measure T-5) plus include mandatory trip reduction requirements (including penalties for non-compliance) and regular monitoring and reporting to ensure the calculated VMT reduction matches the observed VMT reduction. The specific components of the CTR Program are described below:

1. Implement Commute Trip Reduction Marketing (CAPCOA Measure T-7). The CTR marketing strategy shall include information sharing and marketing to promote and educate employees about their travel choices to the employment location. This measure shall require an on-site employee to assume the responsibilities of the transportation coordinator role, help provide commuter information services and facilitate on-site or online transit pass sales.
2. Provide Ridesharing Program (CAPCOA Measure T-8). The CTR Program shall include tenant-provided incentives for carpooling or vanpooling such as priority parking spaces and/or a daily or monthly stipend for participants. Additional incentives for carpool and/or vanpool drivers could also be provided.
3. Implement Subsidized or Discounted Transit Program (CAPCOA Measure T-9). The CTR Program shall include subsidized or discounted, or free transit passes for employees and/or residents.
4. Provide End-of-Trip Bicycle Facilities (CAPCOA Measure T-10). The CTR Program shall include installation and maintenance of end-of-trip facilities for employee use that facilitate bicycling to work. Facilities could include bike locks and bike racks.
5. Provide Employer-Sponsored Vanpool (CAPCOA Measure T-11). The CTR Program shall include implementation of an employer-sponsored vanpool service. Vanpooling is a flexible form of public transportation that provides groups of 5 to 15 people with a cost-effective and convenient rideshare option for commuting.
6. The CTR Program shall include mandatory trip reduction requirements (including penalties for non-compliance) and regular monitoring and reporting to ensure the calculated VMT reduction matches the observed VMT reduction (CAPCOA Measure T-6).

8.0 FINDINGS REGARDING GROWTH INDUCING IMPACTS

CEQA Guidelines Section 15126.2(e) requires that an EIR “discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.” The CEQA Guidelines also indicate that it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. In general terms, a project may foster spatial, economic, or population growth in a geographic area. To address these issues, potential growth-inducing effects were examined through analysis of the following questions:

- Directly or indirectly foster economic or population growth, or the construction of additional housing, in the surrounding environment;
- Remove obstacles to population growth;
- Require the construction of new or expanded facilities that could cause significant environmental effects; or
- Encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

Impact Growth-1 Finding: The Project would not directly or indirectly foster economic or population growth, or the construction of additional housing, in the surrounding environment (DEIR page 6-2). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project does not involve construction of any new residential uses and would not contribute to a direct increase in the City's population. However, the proposed Project may indirectly contribute to population growth within the City by creating jobs both during construction and operation. The Project would require the need for approximately 385 employees, according to employment generation rates from the Southern California Association of Governments (SCAG) which estimate operation of industrial warehouse uses require one employee for every 1,518 SF of warehouse space.

According to SCAG's 2024 RTP/SCS population and household growth forecast for Santa Fe Springs, between 2019 and 2050, SCAG anticipates an employment increase of 2,300 additional jobs (from 57,200 to 59,500), yielding a 4.02 percent growth rate. SCAG regional growth forecasts are based upon, among other things, land uses designated in land use plans. As such, a project that is consistent with the land use designated in a General or Specific Plan would be consistent with SCAG's growth projections. The proposed Project is consistent with the site's existing land use and zoning designations therefore the projected increases in employment resulting from the Project are within SCAG's 2024 RTP/SCS projected increases. Thus, Project-related growth would not be unexpected or constitute substantial unplanned growth.

The proposed Project may cause indirect economic growth as it would generate revenue to the City through taxes generated by the development. Additionally, employees (short-term construction and long-term operational employees) from the Project site would purchase goods and services in the region, but any secondary increase in employment growth associated with meeting these incremental demands would be marginal, as these goods and services could be accommodated by existing providers. The Project is highly unlikely to result in any new or additional physical impacts to the environment based on the amount of existing and planned future commercial and retail services, which can serve Project employees, available in areas near the Project site.

In addition, the proposed Project would create jobs, a majority of which would likely be filled by residents of Santa Fe Springs and the surrounding Los Angeles County areas. The employees that would fill these roles are anticipated to come from the region, as the unemployment rate of the City of Santa Fe Springs was approximately 8 percent. Due to these levels of unemployment, it is anticipated that new employees at the Project site would already reside within commuting distance. Employees would live in housing either already built or planned for development in the City and the surrounding Los Angeles County areas.

Because it is anticipated that most of the future employees from implementation of the Project would already be living in the region, the Project's introduction of employment opportunities would not induce substantial growth in the area and cause the need for additional housing. Thus, the Project would not result in the influx of new labor to serve the increased economic activities that would result from implementation of the Project.

Impact Growth-2 Finding: The Project would not remove obstacles to growth through the construction or extension of major infrastructure facilities that do not presently exist in the Project area or would add substantial capacity that could accommodate additional unplanned growth (DEIR page 6-2). Impacts would be less than significant.

Facts in Support of Finding: The Project proposes installation of new potable water lines, and sewer lines on the site that would connect to surrounding, existing infrastructure in order to accommodate the demands of the Project. The Project would also extend the proposed 8-inch sewer main approximately 250 feet west of the Project site and connect to the existing 8-inch sewer main in Hawkins Street. However, the proposed infrastructure improvements have been designed to serve only the demands of the Project. Therefore, the Project would not expand sewer services into unplanned areas and would not result in significant growth inducing impacts.

The Project does not propose roadway extensions into new undeveloped areas that would allow for additional growth and development.

Impact Growth-3 Finding: The Project would not require the construction of new or expanded facilities that could cause significant environmental effects (DEIR page. 6-3). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project would slightly increase the demand for fire protection and emergency response and police protection. However, as described in the Initial Study, included as Appendix A of this DEIR, the Project would not require development of additional facilities or expansion of existing facilities to maintain existing levels of service for public services. Based on service ratios and build out projections, the Project would not create a demand for services beyond the capacity of existing facilities. Therefore, an indirect growth inducing impact as a result of expanded or new public facilities that could support other development in addition to the proposed Project would not occur. The proposed Project would not have significant growth inducing consequences that would require the need to expand public services to maintain desired levels of service.

Impact Growth-4 Finding: The Project would not encourage or facilitate other activities that could significantly affect the environment individually or cumulatively (Draft EIR at p. 6-3). Impacts would be less than significant.

Facts in Support of Finding: Surrounding Project areas are already developed with commercial and industrial uses. Therefore, the Project would not spur increased development in surrounding areas. Additionally, the proposed infrastructure is only sized to serve the Project and would not have capacity to serve additional development projects in the area. The Project does not propose changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, or fire codes). The proposed Project would comply with all applicable City plans, policies, and ordinances. In addition, Project features and mitigation measures have been identified within this EIR to ensure that the Project minimizes environmental impacts. The proposed Project would not involve any precedent-setting action that could encourage and facilitate other activities that significantly affect the environment.

9.0 FINDINGS REGARDING PROJECT ALTERNATIVES

The City of Santa Fe Springs hereby declares that it has considered and rejected as infeasible the alternatives identified in the Draft EIR and described below. Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to the Project, or to the location of the Project, which could feasibly achieve most of its basic objectives, but would avoid or substantially lessen any of the significant effects identified in the EIR analysis. An EIR is not required to consider every conceivable alternative to a proposed project. Rather, an EIR must consider a reasonable range of alternatives that are potentially feasible; an EIR is not required to consider alternatives that are infeasible. In addition, an EIR should evaluate the comparative merits of the alternatives. Therefore, this section sets forth the potential alternatives to the Project analyzed in the EIR and evaluates them in light of the objectives of the Project, as required by CEQA.

Key provisions of the CEQA Guidelines relating to an alternatives analysis (Section 15126.6 et seq.) are summarized below:

- The discussion of alternatives shall focus on alternatives to the Project or its location that are capable of avoiding or substantially lessening any significant effects of the Project, even if these alternatives would impede to some degree the attainment of the Project objectives or would be more costly.

- The “No Project” alternative shall be evaluated along with its impact. The “No Project” analysis shall discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the Project is not approved.
- The range of alternatives required in an EIR is governed by a “rule of reason;” therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the Project.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the Project need be considered for inclusion in the EIR.
- An EIR need not consider an alternative if its effects cannot be reasonably ascertained and its implementation is remote and speculative.

9.1 RATIONALE FOR SELECTING POTENTIALLY FEASIBLE ALTERNATIVES

The alternatives must include a no-project alternative and a range of reasonable alternatives to the proposed Project if those reasonable alternatives would attain most of the Project objectives while substantially lessening the potentially significant project impacts. The range of alternatives discussed in an EIR is governed by a “rule of reason,” which the CEQA Guidelines Section 15126.6(f)(3) defines as:

“... set[ting] forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the Project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the Project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making.”

Among the factors that may be taken into account when addressing the feasibility of alternatives (as described in the CEQA Guidelines Section 15126.6(f)(1)) are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the Project proponent could reasonably acquire, control, or otherwise have access to an alternative site. An EIR need not consider an alternative if its effects could not be reasonably identified and its implementation is remote or speculative.

For purposes of the EIR analysis, the Project alternatives are evaluated to determine the extent to which they attain the basic Project objectives, while significantly lessening any significant effects of the proposed Project.

9.2 ALTERNATIVES CONSIDERED BUT REJECTED

Pursuant to CEQA Guidelines Section 15126.6(c), an EIR must briefly describe the rationale for selection and rejection of alternatives. The Lead Agency may make an initial determination as to which alternatives are potentially feasible and therefore merit in-depth consideration, and which are infeasible and need not be considered further. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (CEQA Guidelines Section 15126.6(f)(3)). This section identifies alternatives considered by the Lead Agency but rejected as infeasible and provides a brief explanation of the reasons for their exclusion. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the Project Objectives, are infeasible, or do not avoid any significant environmental effects.

9.2.1 ALTERNATE SITE ALTERNATIVE

An alternate site for the Project was eliminated from further consideration. Based on a review of available sites for sale and the City of Santa Fe Springs land use map, there are no other available, suitable sites within the control of the Project Applicant. However, in the event land could be purchased of suitable size, the Project could have the same potential impacts to air quality, biological resources, hazards and hazardous materials, transportation, paleontological resources, and tribal cultural resources. Moreover, other possible sites may not be located in proximity to Interstate 605 (I-605), established truck routes, and with access to available infrastructure, including roads and utilities thereby possibly resulting in further potential impacts. Therefore, analysis of an alternative site for the proposed Project is neither meaningful nor necessary, because the impacts and need for mitigation resulting from the proposed Project would not be avoided or substantially lessened by its implementation. Given these reasons, it would be infeasible to develop and operate the Project on an alternate site with fewer environmental impacts while meeting Project objectives. Therefore, the Alternative Site Alternative was rejected from further consideration.

9.3 ALTERNATIVES SELECTED FOR ANALYSES

The following three alternatives to the Project have been identified for further analysis as representing a reasonable range of alternatives that attain most of the Project Objectives, may avoid or substantially lessen the Project's significant impact, avoid the need for mitigation, or are feasible from a development perspective. These alternatives have been developed based on the criteria identified above and are evaluated below.

- No Project/No Development Alternative (Alternative 1)
- Reduced Project Alternative (Alternative 2)
- Alternative Use and Buildout Alternative (Alternative 3)

9.3.1 ALTERNATIVE 1: NO PROJECT/NO DEVELOPMENT ALTERNATIVE

Description

Under this alternative, the Project would not be developed, and no development would occur. The Project site would remain vacant and undeveloped. In accordance with the CEQA Guidelines, the No Project/No Development Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the *CEQA Guidelines* states that, "In certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained."

Accordingly, Alternative 1: No Project/No Development provides a comparison between the environmental impacts of the Project in contrast to the result from not approving, or denying, the Project. Thus, this alternative is intended to meet the requirements of *CEQA Guidelines* Section 15126.6(e) for evaluation of a no project alternative.

Finding

The City finds that the No Project/ No Development Alternative would result in maintaining the existing site conditions of heavily disturbed from existing and previous oil well construction and operational activities. The proposed development would not occur under the No Project/No Development Alternative. As a result, this alternative would avoid the need for mitigation measures, which include measures related to air quality,

biological resources, hazards and hazardous materials, paleontological resources, transportation, and tribal cultural resources. This alternative would also avoid the significant and unavoidable impacts to transportation. This alternative would result in lessened impacts to 10 of the 11 environmental topics analyzed.

However, the environmental benefits of the proposed Project would also not be realized, including, but not limited to removal and disposal of the existing contaminated soils and removal of the oil well activities on the Project site that generate hazardous materials. Furthermore, the No Project/No Development Alternative would not achieve the City's General Plan Policy S-3.6, to promote the gradual consolidation and elimination of oil drilling and production sites to advance the City's climate adaptation and resiliency strategies, local reduction of greenhouse gases, and land use goals.

This alternative would not make efficient use of the site for employment uses, would not help meet demand for logistic businesses in the city and surrounding region, would not attract new businesses and employment, and would not build a project that is compatible with the surrounding industrial and manufacturing uses that were recently built or approved for construction. These reasons, separately and independently, are a sufficient basis upon which to reject this alternative.

9.3.2 ALTERNATIVE 2: REDUCED PROJECT ALTERNATIVE

Description

The Reduced Project Alternative consists of development of the Project site in a manner similar to the Project, but with a 50 percent reduction in square footage. Specifically, the Reduced Project Alternative would result in the development of two warehouse buildings. Building 1 would be approximately 149,186 SF on the 585,762 SF (13.45-acre) Parcel 1, resulting in a FAR of 0.26. Building 2 would be approximately 143,152 SF on the 570,462 SF (13.09-acre) Parcel 2, resulting in a FAR of 0.25. Development under the Reduced Project Alternative would reduce Project square footage by approximately 50 percent, or by 292,339 SF on the 26.77-acre Project site.

Consistent with the proposed Project, improvements onsite would include landscaping, utility connections, implementation of stormwater facilities, construction of a cul-de-sac driveway on Hawkins Street and pavement of parking areas and driveways. The reduced square footage would allow for increased setbacks, passenger vehicle parking, and truck parking. The reduced square footage would allow for increased setbacks, passenger vehicle parking, and truck parking. Consistent with the proposed Project, this alternative would plug the existing oil wells and remove the oil well equipment and infrastructure on the site. Due to the existing oil well uses and areas of contaminated soils, this alternative includes grading the entire site, and areas planned for physical impact onsite would be identical to those required for development of the proposed Project. Consistent with the proposed Project, the Reduced Project Alternative does not require offsite improvements. The buildings would operate as two speculative industrial warehouses with 80 percent high-cube fulfillment warehouse, 10 percent high-cube cold storage, and 10 percent manufacturing.

Finding

The City finds that the Reduced Project Alternative would eliminate the need for air quality mitigation measures. However, mitigation measures for geology and soils (paleontological resources), hazards and hazardous materials, transportation, and tribal cultural resources would continue to be required for this alternative. The Reduced Project Alternative would generally result in a reduction in the volume of effects due to the 50 percent reduction in building space. However, this alternative would continue to result in

significant and unavoidable impacts to transportation and would only reduce the impact level of air quality, to less than significant with mitigation, which is only one of the 11 environmental topics analyzed.

The Reduced Project Alternative would partially meet the majority of Project objectives, but not to the same extent as the proposed Project. This alternative would redevelop a property in the City of Santa Fe Springs with industrial uses, adding to its potential employment-generating uses and would attract new businesses and employment. Furthermore, the Reduced Project Alternative would develop a speculative warehouse building within proximity to I-5 and I-605 that is compatible with other industrial buildings that were recently built or recently approved by the City. However, this alternative would not meet the main Project objectives to the same extent as the proposed Project would, since the proposed Project would accomplish the same goals, but generally to a greater degree. These reasons, separately and independently, are a sufficient basis upon which to reject this alternative.

9.3.3 ALTERNATIVE 3: ALTERNATIVE USE AND BUILDOUT ALTERNATIVE (DEVELOP ONE BUILDING WITH MANUFACTURING USE AND ONE STORAGE YARD)

Description

The Buildout of Existing Zoning Alternative consists of development of the Project site at a maximum density in an alternative manner that is consistent with the existing zoning designation. As compared to the proposed Project, this alternative would remove Building 2 and develop Building 1 but with manufacturing and accessory office uses. In addition, this alternative would include construction of one storage yard in Parcel 2. Specifically, the Buildout of Existing Zoning Alternative would result in development of one 298,373 SF manufacturing building on the 13.45 parcel with a FAR of 0.51 and one 286,305 SF storage yard on the 13.09 parcel.

Consistent with the proposed Project, improvements onsite would include removal and closure of the existing oil wells, removal and disposal of the contaminated soils, landscaping, utility connections, implementation of stormwater facilities, construction of a cul-de-sac driveway on Hawkins Street and pavement of parking areas and driveways. Areas planned for physical impact on and offsite would be identical to those required for development of the proposed Project. Like the proposed Project, the Buildout of Existing Zoning Alternative does not require offsite improvements. The warehouse portion of the building under this alternative would operate as 100 percent manufacturing.

Finding

The City adopts finds that the Alternative Use and Buildout Alternative would eliminate the need for air quality mitigation measures. However, mitigation measures for geology and soils (paleontological resources), hazards and hazardous materials, and transportation would continue to be required for this alternative. Furthermore, additional mitigation measures related to operational air quality emissions would be required and may result in a significant and unavoidable impact. This alternative would not reduce the impact level of any of the 11 environmental topics analyzed. Furthermore, impacts to transportation would continue to be significant and unavoidable. In addition, operational air quality would be potentially significant under this alternative (compared to less than significant with mitigation under the proposed Project).

The Alternative Use and Buildout Alternative would meet two of the Project objectives and partially meet two of the Project objectives. This alternative would redevelop a property in the City of Santa Fe Springs with industrial uses, adding to its potential employment-generating uses and would attract new businesses and employment. Furthermore, the Alternative Use and Buildout Alternative would develop a speculative warehouse building within proximity to I-5 and I-605 that is compatible with other industrial buildings that

were recently built or recently approved by the City. However, this alternative would not meet all of the Project objectives to the same extent as the proposed Project would, since the proposed Project would accomplish the same goals, but generally to a greater degree. These reasons, separately and independently, are a sufficient basis upon which to reject this alternative.

9.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project/No Development Alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives.

The Environmentally Superior Alternative (other than the No Project/No Build Alternative) would be Alternative 2: Reduced Project Alternative, which would involve developing the Project site with two speculative warehouse buildings. Building 1 would be approximately 149,186 SF on the 585,782 SF (13.45-acre) Parcel 1, resulting in a FAR of 0.26. Building 2 would be approximately 143,152 SF on the 570,462 SF (13.09-acre) Parcel 2, resulting in a FAR of 0.25. This alternative would result in lessened impacts in a part of one of the 11 environmental topics analyzed in this EIR by avoiding the need for mitigating construction air quality impacts. However, this alternative would be required to implement the same applicable mitigation measures regarding geology and soils (paleontological resources), hazards and hazardous materials, transportation, and tribal cultural resources, similar to the Project. Impacts to transportation would continue to be significant and unavoidable under this alternative. Moreover, the Reduced Project Alternative would not meet the Project objectives to the same extent as the proposed Project. Alternative 2 would have a reduction of 192 employees (50 percent) as compared to the proposed Project.

CEQA does not require the Lead Agency (the City of Santa Fe Springs) to choose the environmentally superior alternative. Instead, CEQA requires the City to consider environmentally superior alternatives, weigh those considerations against the environmental impacts of the proposed Project, and make findings that the benefits of those considerations outweigh the harm.

10.0 FINDINGS REGARDING THE MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

Section 21081.6 of the Public Resources Code requires that when making findings required by Section 21081(a) of the Public Resources Code, the Lead Agency approving a project shall adopt a reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval, in order to ensure compliance with project implementation and to mitigate or avoid significant effects on the environment. The City hereby finds that:

1. A MMRP has been prepared for the Project, and the mitigation measures are included therein. The MMRP is incorporated herein by reference and is considered part of the record of proceedings for the Project.
2. The MMRP designates responsibility for implementation and monitoring of proposed mitigation measures. The City's Community Development Director or their designee will serve as the overall MMRP coordinator and will be primarily responsible for ensuring that all mitigation measures are complied with.

3. The MMRP prepared for the Project has been adopted concurrently with these Findings. The MMRP meets the requirements of Section 21021.6 of the Public Resources Code. The City will use the MMRP to track compliance with mitigation measures. The MMRP will remain available for public review during the compliance period.

11.0 STATEMENT OF OVERRIDING CONSIDERATIONS

The City of Santa Fe Springs is the Lead Agency under CEQA for preparation, review, and certification of the EIR for the NWC Telegraph SFS Project. As the Lead Agency, the City is also responsible for determining the potential environmental impacts of the proposed action and which of those impacts are significant, and which can be mitigated through imposition of mitigation measures to avoid or minimize those impacts to a level of less than significant. CEQA then requires the Lead Agency to balance the benefits of a proposed action against its significant unavoidable adverse environmental impacts in determining whether or not to approve the proposed Project. In making this determination the City is guided by CEQA Guidelines Section 15093 which states:

- (a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposal (sic) project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."
- (b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.
- (c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

In addition, Public Resources Code Section 21081(b) requires that where a public agency finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in an EIR and thereby leave significant unavoidable effects, the public agency must also find that overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects of the project.

Pursuant to Public Resources Code Section 21081(b) and CEQA Guidelines Section 15093, the City has balanced the benefits of the proposed Project against the unavoidable adverse impacts associated with the Project and has adopted all feasible mitigation measures with respect to these impacts. The City has also examined alternatives to the proposed Project, none of which meet the Project objectives and are environmentally preferable to the proposed Project for the reasons discussed in the Findings and Facts in Support of Findings.

The City of Santa Fe Springs, as the Lead Agency for this Project, having reviewed the EIR for the NWC Telegraph SFS Project and reviewed all written materials within the City's public record and heard all oral testimony presented at public hearings, adopts this Statement of Overriding Considerations, which has balanced the benefits of the Project against its significant unavoidable adverse environmental impacts in reaching its decision to approve the Project.

11.1 OVERRIDING BENEFITS RESULTING FROM THE PROJECT

The City, after balancing the specific economic, legal, social, technological, and other benefits of the Project, has determined that the unavoidable adverse environmental impacts identified above may be considered acceptable due to the following specific considerations, which outweigh the unavoidable, adverse environmental impacts of the Project, each of which standing alone is sufficient to support approval of the Project, in accordance with Public Resources Code Section 21081(b) and CEQA Guidelines Section 15093. The specific economic, legal, social, technological, or other benefits of the Project are as follows:

- **The Project enhances the local economy.** The Project enhances the local economy by providing an estimated 385 additional jobs in the City of Santa Fe Springs in addition to temporary construction jobs, and business development opportunities commensurate with forecasted growth.
- **The Project facilitates economic development.** The Project is intended to facilitate the economic development of the City by creating an expanded employment base, providing new employment opportunities, and attracting new businesses.
- **The Project provides both traditional and alternative transportation mode benefits.** The Project would implement roadway, pedestrian, and infrastructure improvements (including sidewalks) that would provide social and other benefits to the City's residents.
- **The Project transforms an underutilized site.** The Project would develop the underutilized site with an economically viable development consistent with the General Plan objectives and combines employment opportunities, truck routes, and freeway access.
- **The Project creates a high-quality development.** The Project proposes two high-quality warehouse buildings that will attract businesses and provide a variety of employment opportunities in the community of Santa Fe Springs.
- **Efficient buildings.** The Project will implement Title 24 standards to ensure energy efficiency.
- **The Project improves the local jobs-housing ratio.** The creation of local jobs will reduce the need for members of the local workforce to commute outside the area for employment.
- **The Project would be developed consistent with the City General Plan.** The Project would result in development pursuant to the site's General Plan land use designation and zoning. Implementing the Santa Fe Springs General Plan is a legal and social prerogative of the City. Consistent with the General Plan, the Project facilitates the economic development of the City by creating an expanded employment base by creating building space and providing new diverse employment opportunities.
- **The Project would implement employment generating uses along the I-605.** The Project would result in development of an industrial warehouse use in proximity to I-605, which would facilitate goods movement in Southern California.
- **Environmental benefits.** The Project would remove and dispose of the existing contaminated soils and remove the oil well features on the Project site, thereby advancing City General Plan Policy S-3.6, to promote the gradual consolidation and elimination of oil drilling and production sites.

12.0 CERTIFICATION OF THE FINAL EIR

The City of Santa Fe Springs finds that it has reviewed and considered the Final EIR in evaluating the proposed Project, that the Final EIR is an accurate and objective statement that fully complies with CEQA, and that the Final EIR reflects the independent judgment of the City.

The City of Santa Fe Springs declares that no new significant information as defined by CEQA Guidelines, section 15088.5 has been received by the City after circulation of the Draft EIR that would require recirculation.

The City of Santa Fe Springs certifies the EIR based on the entirety of the record of proceedings, including but not limited to the following findings and conclusions:

Findings:

The following significant environmental impacts have been identified in the EIR and will require mitigation as set forth in Section 10 of these Findings, but cannot be mitigated to a level of insignificance: transportation (Project-level and Cumulative).

Conclusions:

1. Except as to those impacts stated above relating to transportation, all significant environmental impacts from the implementation of the proposed Project have been identified in the EIR and, with implementation of the mitigation measures identified, will be mitigated to a level of insignificance.
2. Other alternatives to the proposed Project, which could potentially achieve the basic objectives of the proposed Project, have been considered and rejected in favor of the proposed Project.
3. Environmental, economic, social, and other considerations and benefits derived from the development of the proposed Project override and make infeasible any alternatives to the proposed Project or further mitigation measures beyond those incorporated into the proposed Project.

13.0 CONCLUSION

Implemented through the MMRP, the mitigation measures previously listed, in conjunction with the above findings, will eliminate or reduce Project related environmental impacts to a less-than-significant level. The Project's significant and unavoidable transportation impacts would be rendered acceptable by the specific economic and social benefits previously identified in Section 11, *Statement of Overriding Considerations*.

Collectively, the Final EIR, the PPP's, and the mitigation measures as listed in the MMRP provide an acceptable rationale for approval of the proposed Project.

This page intentionally left blank.

NORTHWEST CORNER OF TELEGRAPH AND SANTA FE SPRINGS

SCH NO. 2024050495

DRAFT ENVIRONMENTAL IMPACT REPORT

Prepared for
City of Santa Fe Springs
11710 Telegraph Road
Santa Fe Springs, CA 90607

November 2024

Prepared by

E | P | D
SOLUTIONS, INC

949.794.1180
3333 Michelson Drive, Suite 500
Irvine, CA 92612

EPDSolutions.com

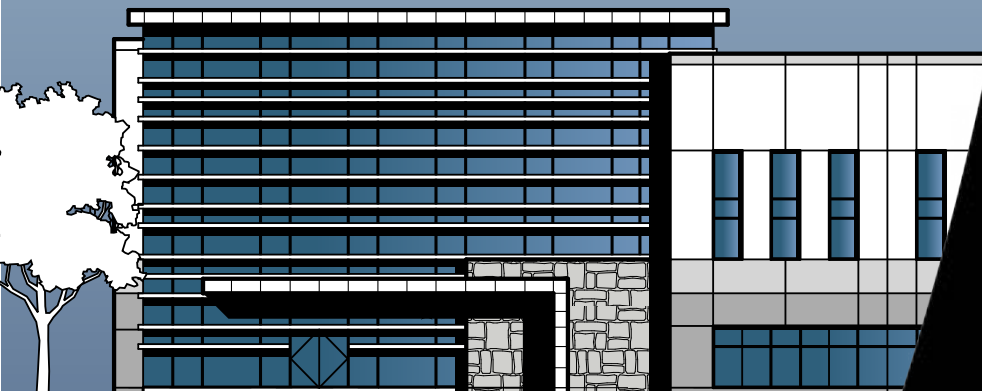


Table of Contents

1. Executive Summary	1-1
2. Introduction.....	2-1
3. Project Description	3-1
4. Environmental Setting	4-1
5. Environmental Impact Analysis.....	5-1
5.1 Air Quality	5.1-1
5.2 Energy	5.2-1
5.3 Geology and Soils	5.3-1
5.4 Greenhouse Gas Emissions.....	5.4-1
5.5 Hazards and Hazardous Materials	5.5-1
5.6 Hydrology and Water Quality	5.6-1
5.7 Mineral Resources.....	5.7-1
5.8 Noise	5.8-1
5.9 Transportation.....	5.9-1
5.10 Tribal Cultural Resources	5.10-1
5.11 Utilities and Service Systems.....	5.11-1
6. Other CEQA Considerations	6-1
7. Effects Found Not Significant	7-1
8. Alternatives	8-1
9. EIR Preparers and Persons Contacted	9-1

Figures

FIGURE 3-1: REGIONAL LOCATION.....	3-4
FIGURE 3-2: LOCAL VICINITY	3-6
FIGURE 3-3: AERIAL VIEW.....	3-8
FIGURE 3-4: EXISTING SITE PHOTOS	3-10
FIGURE 3-5: EXISTING GENERAL PLAN LAND USE.....	3-12
FIGURE 3-6: EXISTING ZONING.....	3-14
FIGURE 3-7: CONCEPTUAL SITE PLAN.....	3-21
FIGURE 3-8: ELEVATIONS A	3-23
FIGURE 3-9: ELEVATIONS B.....	3-25
FIGURE 3-10: CONCEPTUAL LANDSCAPE PLAN	3-27
FIGURE 3-11: CIRCULATION AND DRIVEWAYS.....	3-29
FIGURE 3-12: UTILITY IMPROVEMENTS.....	3-31
FIGURE 5-1: CUMULATIVE PROJECTS	5-7
FIGURE 5.1-1	5.1-31
FIGURE 5.1-2.....	5.1-33
FIGURE 5.8-1: NOISE MEASUREMENT LOCATIONS.....	5.8-9
FIGURE 5.8-2: RECEIVER LOCATIONS	5.8-11
FIGURE 5.9-1: SANTA FE SPRINGS FREIGHT SYSTEM	5.9-5

Tables

TABLE 1-1: SUMMARY OF IMPACTS.....	1-6
TABLE 2-1: SUMMARY OF NOP COMMENT LETTERS	2-3
TABLE 3-1: SURROUNDING EXISTING LAND USE AND ZONING DESIGNATIONS.....	3-2
TABLE 3-2: PROPOSED PROJECT CONSTRUCTION SCHEDULE.....	3-18
TABLE 4-1: SURROUNDING EXISTING LAND USE AND ZONING DESIGNATIONS.....	4-1
TABLE 5-1: CUMULATIVE PROJECTS LIST	5-3
TABLE 5.1-1: AMBIENT AIR QUALITY STANDARDS FOR CRITERIA POLLUTANTS.....	5.1-2
TABLE 5.1-2: AIR QUALITY MONITORING SUMMARY 2021-2023.....	5.1-16
TABLE 5.1-3: ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE SOUTH COAST AIR BASIN	5.1-17
TABLE 5.1-4: SCAQMD REGIONAL AIR QUALITY THRESHOLDS.....	5.1-18
TABLE 5.1-5: DAILY ACRES DISTURBED	5.1-18
TABLE 5.1-6: SCAQMD CONSTRUCTION LOCALIZED SIGNIFICANCE THRESHOLDS	5.1-19
TABLE 5.1-7: SCAQMD OPERATIONAL LOCALIZED SIGNIFICANCE THRESHOLDS	5.1-20
TABLE 5.1-8: CONSTRUCTION EMISSIONS SUMMARY WITHOUT MITIGATION MEASURES	5.1-24
TABLE 5.1-9: MITIGATED ARCHITECTURAL COATING REGIONAL CONSTRUCTION EMISSION	5.1-25
TABLE 5.1-10: SUMMARY OF PEAK OPERATIONAL EMISSIONS.....	5.1-25
TABLE 5.1-11: LOCALIZED CONSTRUCTION-SOURCE EMISSIONS WITHOUT MITIGATION.....	5.1-27
TABLE 5.1-12: LOCALIZED SIGNIFICANCE EMISSIONS FROM PROJECT OPERATION	5.1-28
TABLE 5.1-13: TRAFFIC VOLUMES FOR INTERSECTIONS EVALUATED IN 2003 AQMP.....	5.1-28
TABLE 5.1-14: SUMMARY OF CONSTRUCTION CANCER AND NON-CANCER RISKS.....	5.1-30

TABLE 5.1-15: SUMMARY OF OPERATIONAL CANCER AND NON-CANCER RISKS	5.1-35
TABLE 5.1-16: SUMMARY OF CONSTRUCTION AND OPERATIONAL CANCER AND NON-CANCER RISKS.....	5.1-36
TABLE 5.1-17: CUMULATIVE OPERATIONAL CANCER AND NON-CANCER RISKS.....	5.1-38
TABLE 5.1-18: COMBINED PROJECT CONSTRUCTION AND CUMULATIVE OPERATIONAL HEALTH RISK.....	5.1-38
TABLE 5.2-1: CONSTRUCTION FUEL CONSUMPTION.....	5.2-7
TABLE 5.2-2: ANNUAL OPERATIONAL ENERGY CONSUMPTION.....	5.2-8
TABLE 5.2-3: CONSISTENCY WITH CITY OF RELEVANT GENERAL PLAN POLICIES.....	5.2-9
TABLE 5.4-1: PROJECT CONSTRUCTION GREENHOUSE EMISSIONS	5.4-11
TABLE 5.4-2: PROJECT GENERATED GREENHOUSE GAS EMISSIONS.....	5.4-13
TABLE 5.4-3: PROJECT CONSISTENCY WITH THE CARB 2022 SCOPING PLAN.....	5.4-14
TABLE 5.4-4: PROJECT CONSISTENCY WITH THE CITY GENERAL PLAN POLICIES RELATED TO GHGs.....	5.4-17
TABLE 5.6-1: TYPES OF BMPs INCORPORATED INTO THE PROJECT DESIGN.....	5.6-12
TABLE 5.8-1: FEDERAL CONSTRUCTION NOISE CRITERIA	5.8-3
TABLE 5.8-2: VIBRATION SCREENING STANDARDS	5.8-4
TABLE 5.8-3: NOISE LAND COMPATIBILITY GUIDELINES	5.8-5
TABLE 5.8-4: CITY OF SANTA FE SPRINGS MUNICIPAL CODE OPERATIONAL NOISE LEVEL STANDARDS.....	5.8-6
TABLE 5.8-5: SUMMARY OF 24-HOUR AMBIENT NOISE LEVEL MEASUREMENTS.....	5.8-7
TABLE 5.8-6: CONSTRUCTION REFERENCE NOISE LEVELS	5.8-16
TABLE 5.8-7: CONSTRUCTION NOISE LEVELS AT NEAREST RECEPTORS	5.8-17
TABLE 5.8-8: OPENING YEAR (2026) TRAFFIC NOISE LEVELS WITHOUT PROPOSED PROJECT AND WITH PROPOSED PROJECT	5.8-18
TABLE 5.8-9: DAYTIME PROJECT OPERATIONAL NOISE LEVELS	5.8-19
TABLE 5.8-10: NIGHTTIME PROJECT OPERATIONAL NOISE LEVELS	5.8-19
TABLE 5.8-11: OPERATIONAL NOISE LEVEL COMPLIANCE	5.8-20
TABLE 5.8-12: VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT	5.8-21
TABLE 5.8-13: CONSTRUCTION VIBRATION LEVELS AT NEAREST RECEPTORS	5.8-21
TABLE 5.9-1: PROPOSED PROJECT TRIP GENERATION	5.9-10
TABLE 5.9-2: DAILY CONSTRUCTION VEHICLE TRIPS	5.9-11
TABLE 5.9-3: PROJECT VMT ANALYSIS	5.9-12
TABLE 5.9-4: MITIGATED PROJECT VMT ANALYSIS	5.9-13
TABLE 5.11-1: SANTA FE SPRINGS 2020 WATER SUPPLY (AF)	5.11-3
TABLE 5.11-2: SANTA FE SPRINGS PROJECTED WATER SUPPLY (AF).....	5.11-4
TABLE 5.11-3: SANTA FE SPRINGS PROJECTED WATER DEMAND IN NORMAL YEARS (AF)	5.11-4
TABLE 5.11-4: SANTA FE SPRINGS PROJECTED WATER DEMAND IN NORMAL, SINGLE AND MULTIPLE DRY YEARS (AF)	5.11-4
TABLE 8-1: PROPOSED PROJECT CONSTRUCTION EMISSIONS WITHOUT MITIGATION	8-10
TABLE 8-2: IMPACT COMPARISON OF THE PROPOSED PROJECT AND ALTERNATIVES.....	8-20
TABLE 8-3: COMPARISON OF THE PROPOSED PROJECT AND ALTERNATIVES' ABILITY TO MEET OBJECTIVES	8-20

Appendices

APPENDIX A	INITIAL STUDY/NOTICE OF PREPARATION/NOTICE OF PREPARATION COMMENTS
APPENDIX B	AIR QUALITY, ENERGY, AND GREENHOUSE GAS IMPACT ANALYSIS
APPENDIX C	BIOLOGICAL RESOURCES ASSESSMENT
APPENDIX D	CULTURAL RESOURCES STUDY
APPENDIX E	GEOTECHNICAL INVESTIGATION
APPENDIX F	LOW IMPACT DEVELOPMENT PLAN
APPENDIX G	NOISE AND VIBRATION IMPACT ANALYSIS
APPENDIX H	PALEONTOLOGICAL RECORDS SEARCH
APPENDIX I	PHASE I ENVIRONMENTAL SITE ASSESSMENT
APPENDIX J	PHASE II SUBSURFACE INVESTIGATION REPORT
APPENDIX K	ADDITIONAL SUBSURFACE INVESTIGATION REPORT
APPENDIX L	VEHICLE MILES TRAVELED ANALYSIS

1. Executive Summary

This Draft Environmental Impact Report (EIR) evaluates the environmental effects that may result from the construction and operation of the NWC Telegraph and SFW Project (proposed Project). This EIR has been prepared in conformance with State and City of Santa Fe Springs environmental policy guidelines for the implementation of the California Environmental Quality Act (CEQA).

This Draft EIR is being circulated for review and comment by the public and other interested parties, agencies, and organizations for 45 days in accordance with Section 15087 and Section 15105 of the CEQA Guidelines. During the 45-day review period, the Draft EIR will be available for public review at the City of Santa Fe Springs website

(https://www.santafesprings.org/departments/planning_and_development_department/planning/environmental_documents.php).

Written comments related to environmental issues in the Draft EIR should be addressed to:

Jimmy Wong, Associate Planner
Planning and Development Department
11710 E. Telegraph Road
Santa Fe Springs, CA 90670
jimmywong@santafesprings.org.

A Notice of Availability of the Draft EIR was published concurrently with distribution of this document.

Following public review, the City of Santa Fe Springs will prepare responses to written comments concerning environmental topics and publish a Final EIR. Before taking action to approve the Project, the City of Santa Fe Springs (serving as the CEQA Lead Agency) has the obligation to: (1) ensure this EIR has been completed in accordance with CEQA; (2) review and consider the information contained in this EIR as part of its decision-making processes; (3) make a statement that this EIR reflects the City of Santa Fe Spring's independent judgment; (4) ensure that all significant effects on the environment are avoided or substantially lessened where feasible; and, if necessary, (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or project alternatives identified in this EIR are infeasible and citing the specific benefits of the proposed Project that outweigh its unavoidable adverse effects (CEQA Guidelines Sections 15090-15093).

1.1 PROJECT LOCATION

The proposed Project is located within the central portion of the City of Santa Fe Springs, at the northwest corner of Santa Fe Springs Road and Telegraph Road. Santa Fe Springs is located approximately 13 miles from Downtown Los Angeles, 39 miles from Downtown Riverside, and 14 miles from Long Beach. Regional access to the Project site is provided by Interstate 5 (I-5), Interstate 605 (I-605), and State Route 72 (SR-72). Local access to the Project site is provided via Telegraph Road and Santa Fe Springs Road.

The Project site is located within an unsectioned portion of Township 3 South, Range 11 West of the Whittier, California, United States Geological Survey (USGS) 7.5-minute Quadrangle. The Project site consists of one parcel encompassing approximately 26.77 acres and is generally located south of Telegraph Road, east of Santa Fe Springs Road, north of McCann Drive, and east of Norwalk Boulevard. The site is identified by Assessor's Parcel Number 8005-015-051.

1.2 PROJECT DESCRIPTION SUMMARY

The applicant, Bridgeland Resources LLC, has submitted applications to the City of Santa Fe Springs for a Tentative Parcel Map (TPM) and Development Plan Approval for the project referred to as the NWC Telegraph SFS Project to allow for development of two single-story industrial buildings. The TPM would subdivide the approximately 26.77-acre Project site into two parcels.

The proposed Project would demolish the existing building onsite, cease existing oil well activity and abandon the existing onsite oil wells, and to construct and operate two new industrial buildings with parking, landscaping, and access improvements. The proposed buildings would have a combined total building area of 584,678 SF and a combined total footprint of 564,678 SF. Additional improvements include two proposed underground onsite infiltration trenches, parking, loading docks, decorative landscaping, associated onsite infrastructure, and construction of a cul-de-sac driveway.

1.2.1 Building and Architecture

Building 1 would be located in the northern portion of the site on Parcel 1 and would have a total building area of 298,373 SF, inclusive of 5,000 SF of office space and 5,000 SF of mezzanine area. Building 1 would include a 78-foot and 3-inch setback from the western property line, a 73-foot setback from the northern property line, and a 73-foot setback from the eastern property line.

Building 2 would be located on the southern portion of the site on Parcel 2 and would have a total building area of 286,305 SF, inclusive of 5,000 SF of office space and 5,000 SF of mezzanine area. Building 2 would include a 78-foot and 3-inch setback from the western property line, a 31-foot setback from the southern property line, and a 31-foot setback from the eastern property line.

1.2.2 Circulation and Street Improvements

Access to the site would be provided from two existing driveways and one proposed cul-de-sac driveway, as shown in Figure 3-11, *Circulation and Driveways*. The existing driveways located south of the Project site along Telegraph Road and east of the Project site along Santa Fe Springs Road are 28 feet wide. The proposed 64-foot-wide cul-de-sac driveway would be located west of the Project site, from Hawkins Street and would split into two 56-foot-wide onsite driveways.

Building 1 would be accessible via two driveways: the proposed 64-foot-wide driveway on Hawkins Street and the existing 28-foot-wide driveway on Santa Fe Springs Road. The proposed 64-foot-wide cul-de-sac driveway on Hawkins Street would allow for both automobile and truck access. The existing 28-foot-wide driveway on Santa Fe Springs Road would be restricted to left-in/right-in and right-out turns and would be accessible to automobiles. This access point would be via a reciprocal access agreement with the adjacent property owner(s).

Building 2 would be accessible via two driveways: the proposed 64-foot-wide driveway on Hawkins Street and the existing 28-foot-wide driveway on Telegraph Road. The proposed 64-foot-wide cul-de-sac driveway on Hawkins Street would allow for both automobile and truck access. The existing 28-foot-wide driveway on Telegraph Road would be restricted to right-in and right-out turns and would be accessible to automobiles. This access point would be via a reciprocal access agreement with the adjacent property owner(s).

Each building would be designed to function independently. However, the Project includes installation of a shared 26 to 31-foot-wide drive aisle for internal circulation. Access to the truck loading dock areas would be controlled by gates equipped with Knox pad locks for fire department access.

1.2.3 Parking

Building 1 would include a total of 345 parking stalls, inclusive of 8 accessible stalls, located along the west, north, and east sides of the building. Building 1 would include 40 dock doors and 48 truck trailer stalls located along the south side of the building.

Building 2 would include a total of 339 parking stalls, inclusive of 8 accessible stalls, located along the west, south, and east sides of the building. Building 2 would include 36 dock doors and 33 truck trailer stalls located along the north side of the building.

1.2.4 Landscaping

The proposed Project includes approximately 46,601 SF (1.07 acres) of ornamental landscaping for Building 1 and 38,540 SF (0.89 acres) of ornamental landscaping for Building 2, for a total of 85,141 SF (1.96 acres) of ornamental landscaping. Landscaping would be planted along the perimeter of the industrial buildings and throughout the parking areas.

1.2.5 Infrastructure

The Project applicant would include construction of new underground electric and communication lines that would connect to existing infrastructure which would also be undergrounded near the northern property line as part of the Project. The Project would connect to the existing natural gas line within Hawkins Street.

The proposed Project includes new domestic, fire, and irrigation water service lines that would connect to the existing 12-inch water main within Hawkins Street (west of the Project site), the 16-inch water main within Telegraph Road (south of the Project site), and the 12-inch water line within Santa Fe Springs Road (east of the Project site). These existing water main lines are within the streets surrounding the Project site, and therefore, no water line extensions would be required.

The proposed Project would include installation of new onsite and offsite sewer lines. Proposed 6-inch sewer laterals would be located on the western portion of the site and would connect to a proposed 8-inch sewer main within Hawkins Street. The proposed 8-inch sewer main would extend approximately 250 feet west of the Project site and connect to the existing 8-inch main line in Hawkins Street.

1.2.6 Drainage

The proposed Project would include construction of an onsite drainage system. The Project proposes to install several inlets and onsite drainage pipes to convey site runoff to two proposed underground onsite infiltration trenches that would filter and infiltrate storm water into the site soils and potentially into the groundwater. The two infiltration trenches would be 200 feet by 80 feet and 200 feet by 78 feet and would be located underground below the trailer stalls area, between Building 1 and Building 2. The stormwater infrastructure would capture and treat the 85th percentile of a 24-hour storm event, consistent with the County MS4 Permit requirements.

1.3 PROJECT OBJECTIVES

The Project site plan has been designed to meet a series of Project-specific objectives that have been carefully crafted in order to aid decision makers in their review of the Project and its associated environmental impacts. The primary purpose and goal of the Project is to redevelop an underutilized

property with an industrial use to provide an employment-generating use to help grow the economy in the City of Santa Fe Springs. The Project would achieve this goal through the following objectives:

1. To make efficient use of an underutilized property in the City of Santa Fe Springs by redeveloping it with a modern industrial warehouse that adds to its potential for employment-generating uses and that aligns with the City's General Plan and zoning designations.
2. To redevelop an underutilized property with an industrial warehouse building near Interstate 5 and Interstate 605, to help meet demand for logistics business in the City and surrounding region.
3. To attract new business and employment to the City of Santa Fe Springs and thereby promote economic growth.
4. To build an industrial warehouse project in the City of Santa Fe Springs that is compatible with the surrounding industrial and manufacturing uses that were recently built or recently approved for construction in the City of Santa Fe Springs.

1.4 SUMMARY OF ALTERNATIVES

Section 8, *Alternatives*, of this Draft EIR analyzes a range of reasonable alternatives to the proposed Project. The alternatives that are analyzed in detail in Section 8 are summarized below.

Alternative 1: No Project/No Development Alternative. Consistent with the requirements of CEQA Guidelines Section 15126.6(e), this alternative consists of the Project not being approved, and the Project site remaining in the condition that existed at the time the Notice of Preparation (NOP) was published (May 13, 2024). This includes operation of the existing oil well uses on the Project site.

Alternative 2: Reduced Project Alternative. This Reduced Project Alternative consists of development of the Project site in a manner similar to the Project, but with a 50 percent reduction in square footage and operational intensity. Specifically, the Reduced Project Alternative would result in the development of two warehouse buildings. Building 1 would be approximately 149,186 SF on the 585,762 SF (13.45-acre) Parcel 1, resulting in a FAR of 0.26. Building 2 would be approximately 143,152 SF on the 570,462 SF (13.09 - acre) Parcel 2, resulting in a FAR of 0.25. This alternative would include construction of an onsite drainage system comprised of two underground infiltration trenches, like the proposed Project. Development under the Reduced Project Alternative would reduce the total Project square footage by approximately 50 percent, or by 292,339 on the 26.77-acre Project site. Consistent with the proposed Project, improvements onsite would include landscaping, utility connections, implementation of stormwater facilities, construction of a cul-de-sac driveway on Hawkins Street and pavement of parking areas and driveways. The reduced square footage would allow for increased setbacks, passenger vehicle parking, and truck parking. Consistent with the proposed Project, this alternative would plug the existing oil wells and remove the oil well equipment and infrastructure on the site. Due to the existing oil well uses and areas of contaminated soils, this alternative includes grading the entire site, and areas planned for physical impact onsite would be identical to those required for development of the proposed Project. Consistent with the proposed Project, the Reduced Project Alternative does not require offsite improvements. The buildings would operate as two speculative industrial warehouses with 80 percent high-cube fulfillment warehouse, 10 percent high-cube cold storage, and 10 percent manufacturing.

Alternative 3: Alternative Use and Buildout Alternative (Develop One Building with Manufacturing Use and One Storage Yard). This alternative consists of developing the Project in a manner that is consistent with the existing zoning designation. The Heavy Manufacturing (M-2) zone district provides sites for heavy industrial uses, oil and gas drilling, select manufacturing operations, salvage operations, automobile and truck services, and similar compatible uses. The M-2 zone also permits any use listed as permitted under the Light Manufacturing (M-1) zone district. (Santa Fe Springs Municipal Code Section 155.241). The purpose of the M-1 Zone is to provide appropriately located areas for the establishment of light industrial plants

and related activities and to promote the concentration of such uses in a manner which will foster mutually beneficial relationships with each other, as well as with the areas of the city zoned for heavy industrial development (Santa Fe Springs Municipal Code Section 155.210).

This alternative assumes that the approximately 26.77-acre site would be developed with one 298,373 SF, (inclusive of 5,000 SF of office space and 5,000 SF of mezzanine area) speculative manufacturing building on Parcel 1 and one 286,305 SF storage yard located on Parcel 2. Under this alternative, the building area would be the same as Building 1 of the proposed Project. The warehouse area would operate as 100 percent manufacturing use.

Like the proposed Project, this alternative would include construction of an onsite drainage system comprised of two underground infiltration trenches. However, the size of the drainage system would be reduced as compared to the proposed Project. Consistent with the proposed Project, improvements onsite would include landscaping, utility connections, implementation of stormwater facilities, construction of a cul-de-sac driveway on Hawkins Street and pavement of parking areas and driveways. Areas planned for physical impact onsite would be identical to those required for development of the proposed Project.

1.5 SUMMARY OF IMPACTS

Table 1-1, *Summary of Impacts*, summarizes the conclusions of the environmental analysis contained in this EIR. Section 2, *Introduction*, of this Draft EIR established that the proposed Project would not result in impacts related to certain thresholds from CEQA Appendix G including aesthetics, agriculture and forest resources, biological resources, cultural resources, landscape use and planning, population and housing, public services, recreation, and wildfire. Thus, no further assessment of those impacts was required in this Draft EIR. Therefore, the numbering of impacts shown in Table 1-1 reflects the omission of further evaluation for certain thresholds.

Relevant standard conditions of approval are identified, and mitigation measures are provided for all potentially significant impacts. The level of significance of impacts after the proposed mitigation measures are applied are identified as either significant and unavoidable, less than significant, or no impact. Where Table 1-1 states that no mitigation measures are feasible, a further discussion of this analysis is provided in the relevant portions of this Draft EIR. After the application of all feasible mitigation measures, the Project would result in significant and unavoidable environmental impacts related to transportation.

Table 1-1: Summary of Impacts

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.3 Air Quality				
Impact AQ-1: Would the Project conflict with or obstruct implementation of the applicable air quality plan?		Potentially significant	MM AQ-1: Low ROG/VOC Paint (Construction). Construction plans, specifications, and permitting shall require that during construction, the Project shall use “super-compliant” low volatile organic compound (VOC)/reactive organic gases (ROG) paints which have been reformulated to exceed the regulatory VOC limits (i.e., have a lower ROG/VOC content than what is required) put forth by SCAQMD’s Rule 1113 for all architectural coatings. Super-compliant low ROG/VOC paints shall contain no more than 50g/L of ROG/VOC. Prior to issuance of building permits, the City of Santa Fe Springs shall confirm that plans include the following specifications: • All architectural coatings will be super-compliant low ROG/VOC paints, reduced from the industrial standard of 100 g/L VOC content paint, to a compliant VOC, not exceeding 50 g/L. • Recycle leftover paint. Take any leftover paint to a household hazardous waste center; do not mix leftover	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			water-based and oil-based paint. • Keep lids closed on all paint containers when not in use to prevent VOC emissions and excessive odors. • For water-based paints, clean up with water only. Whenever possible, do not rinse the cleanup water down the drain or pour it directly into the ground or the storm drain. Set aside the can of cleanup water and take it to the hazardous waste center (Public Works Los Angeles County, 2018). • Use compliant low-VOC cleaning solvents to clean paint application equipment.	
Impact AQ-2: Would the Project 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?	PPP AQ-1: Rule 403. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 403, which includes the following: • All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions. • The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the project are watered, with	Potentially significant	MM AQ-1: Low ROG/VOC Paint (Construction) , as listed above.	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	complete coverage of disturbed areas, at least 3 times daily during dry weather; preferably in the mid-morning, afternoon, and after work is done for the day. • The contractor shall ensure that traffic speeds on unpaved roads and project site areas are reduced to 15 miles per hour or less. PPP AQ-2: Rule 1113. The Project is required to comply with the provisions of South Coast Air Quality Management District Rule (SCAQMD) Rule 1113. Only “Low-Volatile Organic Compounds” paints (no more than 50 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications shall be used. PPP AQ-3: Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines. The Project is required to obtain a permit from SCAQMD for the proposed diesel fire pump and would be required to comply with Rule 1470, regulating the use of diesel-fueled internal combustion engines.			

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	PPP AQ-4: Rule 402. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 402. The Project shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.			
Impact AQ-3: Would the Project expose sensitive receptors to substantial pollutant concentrations?	PPP AQ-1: Rule 403 , as listed above.	Less than significant	None required	Less than significant
Impact AQ-4: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	PPP AQ-4: Rule 402 , as listed above.	Less than significant	None required	Less than significant
Cumulative	PPP AQ-1: Rule 403 , as listed above. PPP AQ-2: Rule 1113 , as listed above. PPP AQ-4: Rule 402 , as listed above.	Potentially Significant	MM AQ-1: Low ROG/VOC Paint (Construction) , as listed above.	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.6 Energy				
Impact ENE-1: Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?		Less than significant	None required	Less than significant
Impact ENE-2: Would the Project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?		Less than significant	None required	Less than significant
Cumulative		Less than significant	None required	Less than significant
5.7 Geology and Soils				
Impact GEO-6: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		Potentially significant	MM PAL-1: Paleontological Monitoring. Paleontological monitoring shall be required during mass grading and excavation activities in undisturbed alluvial deposits. Furthermore, full time paleontological monitoring shall be required in undisturbed alluvial deposits during excavation and grading activities starting at five feet below the surface. The following guidelines shall be implemented to reduce adverse impacts to paleontological resources to a level below significant. These guidelines follow the City of Santa Fe Springs's guidelines and	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			the recommendations of the Society of Vertebrate Paleontology: 1. All mitigation programs shall be performed by a qualified professional (Project) paleontologist, defined as an individual with a master's or doctorate degree in paleontology or geology who has proven experience in paleontology and who is knowledgeable in professional paleontological procedures and techniques. Fieldwork shall be conducted by a qualified paleontological monitor, defined as an individual who has experience in the collection and salvage of fossil materials. The paleontological monitor shall always work under the direction of a qualified paleontologist. 2. Prior to the issuance of a grading permit, the Project Applicant or developer shall provide written verification to the City of Santa Fe Springs Planning Department, or designee, stating that a professional paleontologist (who meets the Society of Vertebrate Paleontology's definition for	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			qualified profession paleontologist) has been retained to implement the monitoring program. 3. Prior to initiation of any grading, drilling, and/or excavation activities, a preconstruction meeting shall be held and attended by the Project paleontologist, representatives of the grading contractor and subcontractors, the Project Applicant or developer, and a representative of the City of Santa Fe Springs. The nature of potential paleontological resources shall be discussed, as well as the protocol to be implemented following the discovery of any fossiliferous materials. 4. Monitoring of mass grading and excavation activities shall be performed by a qualified paleontologist or paleontological monitor. Starting at five feet below the surface, monitoring shall be conducted full-time in areas of grading or excavation in undisturbed soils. If paleontological resources are discovered, the area of the discovery shall be cordoned off and a qualified, project-level	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			paleontologist shall be consulted to determine the significance of the finds. 5. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface or, if present, are determined by qualified paleontological personnel upon exposure and examination to have a low potential to contain or yield fossil resources. 6. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor shall have authority to temporarily halt or divert equipment to allow for the removal of abundant or large specimens in a timely manner. 7. Paleontological salvage during trenching and boring activities is typically from the generated spoils and does not delay the trenching or drilling activities. Fossils shall be collected and placed in cardboard flats or plastic buckets and identified by	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			field number, collector, and date collected. Notes shall be taken on the map location and stratigraphy of the discovery site, and the discovery site will be photographed before it is vacated and the fossils are moved to a safe place. 8. In accordance with the “Microfossil Salvage” section of the Society of Vertebrate Paleontology Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources 2010 guidelines, bulk sampling and screening of fine-grained sedimentary deposits (including carbonate-rich paleosols) must be performed if the deposits are identified to possess indications of producing fossil “microvertebrates” to test the feasibility of the deposit to yield fossil bones and teeth. 9. Recovered specimens shall be prepared to a point of identification and permanent preservation. 10. All fossils shall be deposited in an accredited institution (university or museum) that maintains collections of	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			paleontological materials. All costs of the paleontological monitoring and mitigation program, including any one-time charges by the receiving institution, shall be the responsibility of the developer. Typically, the Los Angeles County Museum of Natural History is the preferred repository for fossils found in Los Angeles County.	
Cumulative		Potentially significant	MM PAL-1: Paleontological Monitoring , as listed above.	Less than significant
5.8 Greenhouse Gas Emissions				
Impact GHG-1: Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		Less than significant	None required	Less than significant
Impact GHG-2: Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?		Less than significant	None required	Less than significant
Cumulative		Less than significant	None required	Less than significant
5.9 Hazards and Hazardous Materials				
Impact HAZ-1: Would the Project create a significant	PPP HAZ-1: SCAQMD Rule 1166. Prior to issuance of		MM HAZ-1: Soil Management Plan (SMP). Prior to issuance of	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	grading or excavation permits, the Project applicant shall submit verification to the City Building and Safety Division that it has applied for and obtained a SCAQMD Rule 1166 Contaminated Soil Mitigation Plan that includes but is not limited to the following, as required by SCAQMD. Monitor for VOC contamination at least once every 15 minutes commencing at the beginning of excavation or grading and record all VOC concentration readings. Handling VOC-contaminated soil at or from an excavation or grading site shall segregate VOC-contaminated stockpiles from non-VOC contaminated stockpiles such that mixing of the stockpiles does not take place. VOC-contaminated soil stockpiles shall be sprayed with water and/or approved vapor suppressant and cover them with plastic sheeting for all periods of inactivity lasting more than one hour. A daily visual inspection shall be conducted of all covered VOC contaminated soil stockpiles to ensure the integrity of the plastic covered surfaces. Contaminated soil shall be treated or removed from an excavation or grading site within 30 days from the time of excavation.		a grading or excavation permit a SMP shall be approved by the City of Santa Fe Springs Fire Department as the Certified Unified Program Agency (CUPA), with responsibility for implementing federal and State laws and regulations pertaining to hazardous materials management. The SMP shall implement SCAQMD Rule 1166, RWQCB water quality regulations, and the following measures as deemed appropriate by the City of Santa Fe Springs Fire Department for each Project grading or excavation permit. 1) Preparation: The following activities will be performed prior to the start of earth moving activities: Agency Notification: At least 48 hours before the date of earth moving activities, the contact information for the environmental consulting project manager (a State of California Professional Geologist or Professional Engineer or supervised by one) will be provided to the CUPA via email along with a notification of the date that earthmoving operations and/or other preparation for	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			redevelopment will begin. • SMP Training: The environmental consultant will provide a training session for all earth moving onsite personnel including superintendents. The training will ensure that all onsite personnel are familiar with the requirements of the SMP in an on-Site, pre-grading kick-off meeting. • PID Rental: A photo-ionization detector (PID) that shall be used to read concentrations of volatile organic compounds (VOCs) will be utilized by the environmental professional responsible for SCAQMD Rule 1166 permit monitoring. 2) Field Identification Procedures: Prior to grading or other earth moving activities, environmental consulting personnel shall train the earth moving superintendent in the recognition of impacted soil and the notifications required. When impacted soil is observed, the superintendent will notify the environmental	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			consultant to visit the site to inspect the area. The superintendent shall also take digital photographs for email delivery to the environmental consultant. The superintendent shall communicate details regarding the potential environmental issue via telephone conversation immediately as practicable but not later than the end of the business day the potential environmental issue is encountered. Excavation in the area of VOC impacted soils will cease until the environmental professional mobilizes to the Site to further inspect. The pre-field training of earth moving personnel shall emphasize that any of the following observed conditions on the site will require notification to the superintendent (who will then communicate these conditions to the environmental consulting contact): • Discolored Soil: Observation of soil that is discolored with black, dark, multi-colored, white, or other discoloration when compared to the surrounding material. This	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			condition may be indicative of potential chemical impact by asbestos, metals-containing compounds and/or petroleum hydrocarbon compounds and is especially effective for identification of heavier end hydrocarbons such as those found in crude oil. • Odorous Soil: Soil encountered that has a noticeable odor of anything other than a musty odor which is typically a result of mold (biological). This condition is indicative of potential chemical impact by volatiles and petroleum hydrocarbon compounds and is especially effective for identification of volatile compounds such as light end hydrocarbons or other crude oil components. • PID Use: Training shall include the proper use, calibration, startup, and shutdown of a PID. • PID Readings Sustained over 50 parts per	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			million (ppm) for more than 10 seconds at 3 inches above the soil surface: If soil such as that described in 1 and 2 above is encountered, the superintendent shall take a reading with the PID and notify the environmental consultant of the location, soil observations, and PID readings. The environmental consultant may choose to inspect the area and compare the location with previous data to determine whether this is a new or known area. If readings over 50 ppm are sustained for more than 10 seconds 3 inches above the soil surface, this condition is indicative of potential chemical impact by VOCs. This field screening method will identify potential environmental issues related to diesel, gasoline, and volatile organic compounds. • Encounter of a previously unidentified feature: Any underground features such as underground	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			pipes, tanks (USTs), or clarifiers that are encountered (which, upon observation by the environmental consultant, is deemed to have potentially been used to contain liquids or exhibits staining) will require removal, soil sampling, sample analysis, and evaluation of analytical results by the oversight environmental professional pursuant to a permit from the Santa Fe Springs Fire Department. 3) Procedures Following Identification of a Potential Environmental Issue: If discolored and/or odorous or soil with PID readings exceeding a sustained reading of 50 ppm is encountered, the following procedure shall be followed: a. The earth moving superintendent will inform the environmental consultant project manager as soon as possible but not later than the end of the business day the potentially impacted soil is encountered	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			b. Cease excavation in area of impact to allow environmental professional to mobilize to the site to observe the condition and oversee the excavation of odorous and discolored soil for separate stockpiling with pile identified as to the location of the area it came from. Stockpiles will be placed on plastic sheeting to protect underlying soil. The stockpile will be sampled according to the protocols in the next section and covered with plastic sheeting pending analytical results. c. The environmental consultant personnel may visit the site to observe the potentially impacted soil and collect samples if necessary. If necessary, the environmental consultant personnel will supervise removal of the soil, agency notifications, and sample collection. d. The environmental consultant will perform the following: a) Observation of the nature of and the	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			condition of the area where the potentially impacted soil was found and comparison to site characterization and remediation data. b) One sample of potentially impacted soil per 250 cubic yards of soil removed. Samples used to characterize soil stockpiles may be composited. c) Soil samples from each impacted area will be analyzed for the following: i. TPH – 8015M ii. VOCs – 8260 iii. Title 22 metals iv. Samples from areas of unknown sources of TPH may also be analyzed for PCBs by EPA Method 8082 and for SVOCs by EPA Method 8270.	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			e. As necessary, stockpiled soil that exceeds screening thresholds and cannot remain onsite shall be disposed of offsite according to all applicable regulations through oversight by the CUPA (Santa Fe Springs Fire Department) as documented in writing. f. Results of environmental oversight and performing the procedures of the SMP, including soil sampling results and analysis as well as the final disposition of sampled soils shall be provided in writing to the CUPA prior to issuance of additional construction permits. MM HAZ-2: Health and Safety Plan (HSP). Prior to ground-disturbing activities, including well abandonment, grading, trenching, excavation, or structure demolition	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			a HSP shall be approved by the City of Santa Fe Springs Fire Department as the Certified Unified Program Agency (CUPA), with responsibility for implementing federal and State laws and regulations pertaining to hazardous materials management. The Project Applicant and/or the construction contractor(s) shall retain a qualified professional to prepare a site-specific HSP in accordance with federal Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1910.120) and California OSHA regulations (8 CCR Section 5192). HSPs shall be a condition of the well abandonment, grading, construction, and/or demolition permit(s). The HSP shall be implemented by the construction contractor to protect construction workers, the public, and the environment during all ground-disturbing activities from exposure to hazardous materials, including vapor and soil contamination. The HSP shall include, but not be limited to, the following elements: • Designation of a trained, experienced site safety and health supervisor who has the responsibility and authority to	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			develop and implement the site HSP. • The HSP shall be provide compliance with OSHA Safety and Health Standards and provide procedures in the event of release or human contact with hazardous materials during all construction activities. • A summary of all potential risks to construction workers and maximum exposure limits for all known and reasonably foreseeable site chemicals. • Specified personal protective equipment and decontamination procedures, if needed. • Gas monitoring devices – A 4 or 5 gas meter capable of measuring methane, hydrogen sulfide, oxygen and carbon monoxide shall be in place pursuant to the Soil Management Plan (SMP) (Mitigation Measure HAZ-1) to alert workers in the event elevated gas or other vapor concentrations occur when soil excavation is being performed. • In the event that elevated levels of subsurface gases are encountered during grading and excavation, the	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			HSP shall address potential vapor encroachment from soil contamination or oil well infrastructure within and near the Project site and the environmental professional will be notified to respond to the Site. • A requirement specifying that any site worker who identifies hazardous materials has the authority to stop work and notify the site safety and health supervisor. • Contingency procedures shall be in place in the event that elevated gas concentrations are detected, such as the mandatory use of personal protective equipment, evacuation of the area, and/or increasing ventilation within the immediate work area. Workers shall be trained to identify exposure symptoms and implement alarm response. • Emergency procedures, including the route to the nearest hospital. • The requirement to prepare documentation showing that HSP measures have been implemented during construction (e.g., tailgate safety meeting notes with	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			signup sheet for attendees, soils gas testing data).	
Impact HAZ-2: Would the Project 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?	PPP HAZ-1: SCAQMD Rule 1166, as listed above. PPP HAZ-2: SCAQMD Rule 1403. Prior to issuance of demolition, grading, or excavation permits, the Project applicant shall submit verification to the City Building and Safety Division that an asbestos survey has been conducted at all existing buildings located on the Project site. If asbestos is found, the Project applicant shall follow all procedural requirements and regulations of South Coast Air Quality Management District Rule (SCAQMD) 1403. Rule 1403 regulations require that the following actions be taken: notification of SCAQMD prior to construction activity, asbestos removal in accordance with prescribed procedures, placement of collected asbestos in leak-tight containers or wrapping, and proper disposal. PPP HAZ-3: Lead. Prior to issuance of demolition, grading, or excavation permits, the Project applicant shall submit verification to the City Building		MM HAZ-1, as listed above. MM HAZ-2, as listed above.	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	and Safety Division that a lead-based paint survey has been conducted at all existing building structures located on the Project site. If lead-based paint is found, the Project applicant shall follow all procedural requirements and regulations for proper removal and disposal of the lead-based paint. Cal-OSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, CCR Title 8, Section 1532.1 provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead. PPP HAZ-4: Well Abandonment. Pursuant to Municipal Code Section 117.127, <i>Criteria for Well Abandonment</i>, a well shall be considered properly abandoned for the purpose of this section when all of the following events have occurred: A. If applicable, any holes associated with a well have been filled with native earth and compacted to a 90% compaction factor. B. The derrick and all appurtenant equipment thereto have been removed			

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	from the drill site. All drilling and production equipment, tanks, towers and other surface installations used in connection with the well shall have been removed from the drill site or tank farm site. The cleaning of the site shall comply with the regulations of Division of Oil, Gas and Geothermal Resources (DOGGR). C. All buried pipelines shall have been excavated and removed or, if approved by the Fire Chief, purged of all hydrocarbon substances and filled with water-base drilling mud or other inert materials. The surface of the land, insofar as practicable, has been left in a neat and orderly condition. D. The depth from ground level to the top of the well casing shall be a minimum of five feet and a maximum of 10 feet unless a different cut-off depth is approved by DOGGR. E. A permit to abandon the well shall be obtained from the Fire Department prior to abandonment. The Fire Chief or his designee shall witness the pouring of the last 25 feet of the cement well plug and the welding			

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	of a plate across the top of the well. The plate on the top of the abandoned well shall conform to current DOGGR requirements and include the date of abandonment. The Fire Chief or his designee shall inspect and certify in writing that the well has been properly abandoned in accordance with provisions of this section. F. A copy of the DOGGR Report of Well Abandonment or other final determination has been provided to the Fire Chief and the Director. PPP HAZ-5: Prior to New Construction. Pursuant to Municipal Code Section 117.129, <i>Requirements Prior to New Construction</i>, prior to the issuance by the City of a building or grading permit for property upon which there are any active or abandoned wells, the applicant shall complete all of the following: A. Obtain a construction site well review from DOGGR. B. Conduct a soils gas study in accordance with § 117.131.			

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	C. Obtain a permit from the Fire Department to expose all former wells, survey their location and test each well for gas or fluid leaks under the supervision of an oil and gas professional authorized by the Fire Department. Conduct this leak test and submit results to the Fire Department. D. Provide a well access site map to the Planning Department for approval. The site map shall include all of the following: 1. Detailed location of each well including the depth from ground level to the top of the well casing of each abandoned well in relation to finished grade. 2. Demonstrate how vehicles and abandonment equipment will access each well from the public right-of-way. 3. Demonstrate that adequate setbacks will be provided for setting up abandonment equipment around each well.			

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	E. Obtain a permit from the Fire Department for the installation of a vent cone and related equipment for all abandoned wells located below or in close proximity to the proposed new construction. F. Agree to implement all mitigation measures required by the Fire Chief including, but not limited to, installation and maintenance of methane barriers, vents/blowers, alarms and the like (collectively, "Methane Mitigation Systems"). G. If applicant performs a leak test pursuant to § 117.129(C) and the test indicates the well is leaking, applicant shall abandon or reabandon the well pursuant to § 117.127. H. File an indemnity bond pursuant to Cal. Public Resources Code §§ 3204 or 3205. I. Execute and record against the property an environmental release and indemnity agreement providing that the property owner and his assignees, release, indemnify and hold harmless the city against			

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	any and all claims, obligations, and causes of action of any kind or nature whatsoever, known or unknown, for personal injury or death, property damage, economic loss, and fines and penalties. The City Attorney shall approve the form of the disclosure and indemnity agreement. PPP HAZ-6: Reabandon Wells. Pursuant to Municipal Code Section 117.130, <i>Abandoned Wells That Do Not Meet Current DOGGR Standards</i>, if DOGGR determines that a well has not been abandoned to its current standards, the Director, in consultation with the Fire Chief, may conditionally authorize issuance of a building and/or grading permit for a property if the following conditions are met: (A) The applicant meets the requirements of § 117.129(A) through (I). For construction over an abandoned well, § 117.129(D) may be waived by the Director in consultation with the Fire Chief. (B) The applicant shall obtain, at his sole cost, a certified report from a California-			

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	licensed professional engineer or geologist qualified and experienced with oil well abandonment indicating that it is not reasonable or feasible for the applicant to do additional well abandonment work in order to meet current DOGGR abandonment standards. The engineer's or geologist's report shall: (1) Demonstrate that, as abandoned, the well will not pose any significant risk to public health, safety, welfare or the environment. (2) Demonstrate that (a) the well is a safe distance from any existing or proposed structures or improvements; and (b) in the event the Fire Department or DOGGR orders reabandonment of the well, the applicant has adequate access to the well. This requirement does not apply to construction over an abandoned well. PPP HAZ-7: Methane Mitigation System. Pursuant to Municipal Code Section 117.131, <i>Requirements for a Soils Gas</i>			

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	<i>Study or Methane Mitigation System</i>, a soil gas investigation to identify the concentration of methane gas in the subsurface is required for sites within 500 feet of an existing or abandoned oil well. Based on the results of the soils gas monitoring or on information available on surrounding properties, property owners shall implement any other mitigation measures as required by the Fire Chief. Methane mitigation systems shall be required for any regulated construction if any of the following apply: (1) The initial monitoring reveals methane levels in excess of 25% of the lower explosive limit (i.e., 1.25% by volume in air or 12,500 ppm/v). (2) The regulated construction will impede access to an abandoned oil well. (3) Quarterly or annual monitoring reveals methane levels greater than 25% of the lower explosive limit (i.e., 1.25% by volume in air or 12,500 ppm/v). The design of a methane mitigation system for property within the methane zone shall be in accordance with the requirements of the Los Angeles County Department of Public			

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	Works and City Fire Department and shall include permanent monitoring vapor probes above and below the barrier unless an alternative design is approved by the Fire Chief. Where gas detection systems are used, they shall be designed by and installed under the supervision of registered engineers. The design and installation shall be inspected and approved by the Fire Department. PPP HAZ-8: Hazardous Wastes. Pursuant to Municipal Code Section 152.33, <i>Extremely Hazardous Wastes</i>, any storage, treatment, disposal, or transportation of extremely hazardous waste as defined in Cal. Health and Safety Code § 25115, by the facility owner/operator shall be reported to the Director of Planning and Fire Chief at least 48 hours prior to such storage, treatment, disposal, or transportation. PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Building and Safety Department with evidence of compliance with the NPDES (National Pollutant			

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site. PPP HYD-2: LID. Prior to the issuance of any grading permits, a completed Low Impact Development Plan (LID) shall be submitted to and approved by the City's Public Works Department. The LID shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.			
Impact HAZ-3: Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile		Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
of an existing or proposed school?				
Impact HAZ-4: Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, create a significant hazard to the public or the environment?		Less than significant	None required	Less than significant
Impact HAZ-5: 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 or excessive noise for people residing or working in the Project area?		No impact	None required	No impact
Impact HAZ-6: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?		No impact	None required	No impact
Impact HAZ-7: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?		No impact	None required	No impact

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Cumulative		Potentially significant	MM HAZ-1, Soil Management Plan (SMP) , as listed above. MM-HAZ-2 Health and Safety Plan (HSP) , as listed above.	Less than significant
5.10 Hydrology and Water Quality				
Impact HYD-1: Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Building and Safety Department with evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site. PPP HYD-2: LID. Prior to the issuance of any grading permits, a completed Low Impact Development Plan (LID) shall be submitted to and approved by	Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	the City's Public Works Department. The LID shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.			
Impact HYD-2: Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	PPP HYD-2: LID , as listed above.	Less than significant	None required	Less than significant
Impact HYD-3: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (i) Result in a substantial erosion or siltation on- or off-site; (ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; (iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or	PPP HYD-1: NPDES/SWPPP , as listed above. PPP HYD-2: LID , as listed above.	Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
provide substantial additional sources of polluted runoff; or (iv) Impede or redirect flood flows?				
Impact HYD-4: In flood hazard, tsunami, or seiche zones, would the Project risk release of pollutants due to Project inundation?	PPP HYD-1: NPDES/SWPPP , as listed above.	Less than significant	None required	Less than significant
Impact HYD-5: Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	PPP HYD-1: NPDES/SWPPP , as listed above.	Less than significant	None required	Less than significant
Cumulative	PPP HYD-1: NPDES/SWPPP , as listed above. PPP HYD-2: LID , as listed above.	Less than significant	None required	Less than significant
5.12 Mineral Resources				
Impact MIN-1: Would the Project 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?		Less than significant	None required	Less than significant
Impact MIN-2: Would the Project result in the loss of availability of a locally important mineral resource recovery site delineated on a		No impact	None required	No impact

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
local general plan, specific plan, or other land use plan?				
Cumulative		Less than significant	None required	Less than significant
5.13 Noise				
Impact NOI-1: Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		Less than significant	None required	Less than significant
Impact NOI-2: Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?		Less than significant	None required	Less than significant
Impact NOI-3: For a project located within the vicinity of a private airstrip or 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?		Less than significant	None required	Less than significant
Cumulative		Less than significant	None required	Less than significant
5.17 Transportation				
Impact TRA-1: Would the Project conflict with a program,		Less than significant	None required	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?				
Impact TRA-2: Would the Project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?		Potentially significant	MM TRA-1 (CAPCOA Measures T-5 through T-11): Commute Trip Reduction Program. The City's operational and occupancy permitting shall include that the tenant shall be required (by contract specifications) to implement a Commute Trip Reduction (CTR) Program to encourage employees to carpool, take transit, and bike to work. 100% of employees shall be eligible to participate in all identified measures of the CTR Program. The mandatory CTR Program shall include all other elements (i.e., CAPCOA Measures T-7 through T-11) described for the voluntary program (Measure T-5) plus include mandatory trip reduction requirements (including penalties for non-compliance) and regular monitoring and reporting to ensure the calculated VMT reduction matches the observed VMT reduction. The specific components of the CTR Program are described below: 1. Implement Commute Trip Reduction Marketing (CAPCOA Measure T-7). The CTR marketing strategy shall	Significant and unavoidable

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			include information sharing and marketing to promote and educate employees about their travel choices to the employment location. This measure shall require an on-site employee to assume the responsibilities of the transportation coordinator role, help provide commuter information services and facilitate on-site or online transit pass sales. 2. Provide Ridesharing Program (CAPCOA Measure T-8). The CTR Program shall include tenant-provided incentives for carpooling or vanpooling such as priority parking spaces and/or a daily or monthly stipend for participants. Additional incentives for carpool and/or vanpool drivers could also be provided. 3. Implement Subsidized or Discounted Transit Program (CAPCOA Measure T-9). The CTR Program shall include subsidized or discounted, or free transit passes for employees and/or residents. 4. Provide End-of-Trip Bicycle Facilities (CAPCOA Measure T-10). The CTR Program shall include installation and maintenance of end-of-trip facilities for employee use	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			that facilitate bicycling to work. Facilities could include bike locks and bike racks. 5. Provide Employer-Sponsored Vanpool (CAPCOA Measure T-11). The CTR Program shall include implementation of an employer-sponsored vanpool service. Vanpooling is a flexible form of public transportation that provides groups of 5 to 15 people with a cost-effective and convenient rideshare option for commuting. 6. The CTR Program shall include mandatory trip reduction requirements (including penalties for non-compliance) and regular monitoring and reporting to ensure the calculated VMT reduction matches the observed VMT reduction (CAPCOA Measure T-6).	
Impact TRA-3: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?		Less than significant	None required	
Impact TRA-4: Would the Project result in inadequate emergency access?		Less than significant	None required	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Cumulative		Potentially significant	MM TRA-1 (CAPCOA Measures T-5 through T-11): Commute Trip Reduction Program , as listed above.	Significant and unavoidable
5.18 Tribal Cultural Resources				
Impact TCR-1: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: (i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)? (ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	PPP CUL-1: Human Remains. Should human remains or funerary objects be discovered during Project construction, the Project will be required to comply with State Health and Safety Code Section 7050.5, which states that no further disturbance may occur in the vicinity of the body until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine the identity of and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD must complete the inspection within 48 hours of notification by the NAHC.	Potentially significant	CUL-1: Inadvertent Discovery. In the event that potential archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the City or County List of Qualified Archaeologists has evaluated the find to determine whether the find constitutes a “unique archaeological resource,” as defined in Section 21083.2(g) of the California Public Resources Code. Any resources identified shall be treated in accordance with California Public Resources Code Section 21083.2(g). If the discovered resource(s) appears Native American in origin, a Native American Monitor shall be contacted to evaluate any potential tribal cultural resource(s) and shall have the opportunity to consult on appropriate treatment and curation of these resources. The discovery would also be reported to the City and the South Central Coastal Information Center (SCCIC). Prior to the issuance of any permits for	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			ground-disturbing activities that include the excavation of soils (including as grading, excavation, and trenching), the City shall ensure that all Project grading and construction plans and specifications include requirement to halt construction activity and contact an archaeologist. TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities a. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal,	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			boring, grading, excavation, drilling, and trenching. b. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. c. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to Kizh Nation. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			applicant/lead agency upon written request to the tribe. d. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to Kizh Nation from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs. TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial) Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			discovered TCR has been fully assessed by the Kizh Nation monitor and/or Kizh Nation archaeologist. Kizh Nation will recover and retain all discovered TCRs in the form and/or manner the tribe deems appropriate, in the tribe's sole discretion, and for any purpose the tribe deems appropriate, including for educational, cultural and/or historic purposes. TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects a. Native American Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. . b. If Native American human human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). c. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). d. Preservation in place in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.	
Cumulative	PPP CUL-1: Human Remains , as listed above.	Potentially significant	CUL-1: Inadvertent Discovery, as listed above. TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities, as listed above. TCR-2: Unanticipated Discovery of Tribal Cultural Resource	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			Objects (Non-Funerary/Non-Ceremonial) , as listed above.	
5.19 Utilities and Service Systems				
Impact UT-1: Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?		Less than significant	None required	Less than significant
Impact UT-2: Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?		Less than significant	None required	Less than significant
Impact UT-3: Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?		Less than significant	None required	Less than significant
Impact UT-4: Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local		Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
infrastructure, or otherwise impair the attainment of solid waste reduction goals?				
Impact UT-5: Would the Project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?		Less than significant	None required	Less than significant
Cumulative		Less than significant	None required	Less than significant
Biological Resources				
	PPP BIO-1: Migratory Bird Treaty Act. Vegetation removal should occur outside of the nesting bird season (generally between February 1 and September 15). If vegetation removal is required during the nesting bird season, the applicant must conduct take avoidance surveys for nesting birds prior to initiating vegetation removal/clearing. Surveys will be conducted by a qualified biologist(s) within three days of vegetation removal. If active nests are observed, a qualified biologist will determine appropriate minimum disturbance buffers and other adaptive mitigation techniques (e.g., biological monitoring of active nests during construction-related activities, staggered schedules, etc.) to ensure that impacts to nesting birds are avoided until			

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	the nest is no longer active. At a minimum, construction activities will stay outside of a 200-foot buffer around the active nests. The approved buffer zone shall be marked in the field with construction fencing and shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests.			

This page intentionally left blank.

2. Introduction

This Draft Environmental Impact Report (EIR) is an informational document that evaluates the environmental effects that may result from the planning, construction, and operation of the proposed NWC Telegraph SFS Project (Project), which requires approval of the Tentative Parcel Map and Development Plan.

2.1 PURPOSE OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

The California Environmental Quality Act (CEQA) requires that all State and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority prior to taking action on those projects. The CEQA Guidelines provide the following information regarding the purpose of an EIR:

- **Project Information and Environmental Effects.** An EIR is an informational document that will inform public agency decision makers and the public generally of the potential significant environmental effect(s) of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information that may be presented to the agency (State CEQA Guidelines Section 15121(a)).
- **Standards for Adequacy of an EIR.** An EIR should be prepared with a sufficient degree of analysis to enable decision makers to make an intelligent decision that takes into account environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure (State CEQA Guidelines Section 15151).

As a public disclosure document, the purpose of an EIR is not to recommend either approval or denial of a project, but to provide information regarding the physical environmental changes that would result from an action being considered by a public agency to aid in the agency's decision-making process.

2.2 LEGAL AUTHORITY

This Draft EIR has been prepared in accordance with all criteria, standards, and procedures of CEQA (California Public Resource Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15000 et seq.).

Pursuant to CEQA Section 21067 and State CEQA Guidelines Article 4 and Section 15367, the City of Santa Fe Springs is the Lead Agency under whose authority this Draft EIR has been prepared. "Lead Agency" refers to the public agency that has the principal responsibility for carrying out or approving a project. Serving as the Lead Agency and before taking action on any approvals for the Project, the City of Santa Fe Springs has the obligation to: (1) ensure that this Draft EIR has been completed in accordance with CEQA; (2) review and consider the information contained in this Draft EIR as part of its decision-making process; (3) make a statement that this Draft EIR reflects the City of Santa Fe Springs independent judgment; (4) ensure that all significant effects on the environment are eliminated or substantially lessened where feasible; and, if necessary, (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or Project alternatives identified in this Draft EIR are infeasible and citing the specific benefits of the proposed Project that outweigh its unavoidable adverse effects (State CEQA Guidelines Sections 15090 through 15093).

Pursuant to State CEQA Guidelines Sections 15040 through 15043, and upon completion of the CEQA review process, the City of Santa Fe Springs will have the legal authority to do any of the following:

- Approve the Project;
- Require feasible changes in any or all activities involved in the Project in order to substantially lessen or avoid significant effects on the environment;
- Disapprove the Project, if necessary, in order to avoid one or more significant effects on the environment that would occur if the Project was approved as proposed; or
- Approve the Project even though the Project would cause a significant effect on the environment if the City of Santa Fe Springs makes a fully informed and publicly disclosed decision that: (1) there is no feasible way to lessen the effect or avoid the significant effect; and (2) expected benefits from the Project will outweigh significant environmental impacts of the Project.

2.3 ENVIRONMENTAL IMPACT REPORT PROCESS

A project-level analysis has been provided pursuant to State CEQA Guidelines Section 15161. This Draft EIR meets the content requirements discussed in State CEQA Guidelines Article 9, beginning with State CEQA Guidelines Section 15120.

2.3.1 Notice of Preparation/Initial Study

The City prepared an Initial Study (IS) and determined that an EIR should be prepared for the Project. As a result, and pursuant to the requirements of CEQA, the IS and a Notice of Preparation (NOP) was circulated on May 13, 2024, for a public review period of 30 days through June 12, 2024. The purpose of the NOP was to solicit early comments from public agencies with expertise in subjects that are discussed in this Draft EIR and to solicit comments from the public regarding potential Project environmental impacts. Topics requiring a detailed level of analysis evaluated in this Draft EIR have been identified based upon the responses to both the IS/NOP and a review of the Project by the City.

As provided in the IS/NOP, the City determined through the initial review process that impacts related to the following topics are potentially significant and required a detailed level of analysis in this Draft EIR.

• Air Quality	• Mineral Resources
• Energy	• Noise
• Geology and Soils	• Transportation
• Greenhouse Gas Emissions	• Tribal Cultural Resources
• Hazards and Hazardous Materials	• Utilities and Service Systems
• Hydrology and Water Quality	

The NOP requested members of the public and public agencies to provide input on the scope and content of environmental impacts that should be included in the EIR being prepared. Comments received on the NOP are included in Appendix A and are summarized in Table 2-1, which also includes a reference to the Draft EIR sections in which issues raised in the comment letters are addressed.

Table 2-1: Summary of NOP Comment Letters

Comment Letter and Commenter	Relevant Draft EIR Sections
State and Local Agencies	
Native American Heritage Commission (NAHC), May 13, 2024	
The comment includes a description of requirements regarding requirements for preparation of an Environmental Impact Report (EIR) pursuant to CEQA Guidelines Section 15064. Additionally, the commenter provides requirements and project applicability under Assembly Bill 52 (AB 52) and Senate Bill 18 (SB 18). The commenter recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project as early as possible. The commenter provides a summary of requirements for AB 52 and SB 18 process.	Section 5.10, <i>Tribal Cultural Resources</i> .
California Department of Justice, May 31, 2024	
This comment letter states that warehouses can bring various environmental impacts to the communities where they are located and provides examples of greenhouse gases such as NO _x and diesel particulate matter stating that they are contributors to the development of respiratory problems, cancer, and can lead to premature death. The comment letter also states that trucks and loading activities are loud causing disruptive noise levels that can cause hearing damage after prolonged exposure. In addition, the comment letter states that traffic generated from warehouses can lead to unsafe road conditions and accidents. The commenter states that they have attached the Attorney General Warehouse Best Practices that are intended to help lead agencies avoid, analyze, and mitigate warehouses' environmental impacts and encourage it to be considered during preparation of the DEIR. Lastly, the comment letter states that priority should be placed on avoiding land use conflicts between warehouses and sensitive receptors and on mitigating impacts as well as on reducing emissions of the project to help the State meet its air quality goals.	Section 5.1, <i>Air Quality</i> Section 5.4, <i>Greenhouse Gas Emissions</i> Section 5.8, <i>Noise</i> Section 5.9, <i>Transportation</i>
California Department of Transportation (Caltrans), June 12, 2024	
This comment letter includes a description of the Project and states that the Project is in proximity to SR-72 and SR-605 thus multi-modal infrastructure is encouraged to be incorporated along and within the site for people walking, riding bicycles, and riding transit. The comment letter also requests that a multi-modal conflict/safety analysis be performed across the project and the seven listed intersections. The comment letter states that if safety impacts are found, they should be addressed with Transportation Demand/System Management mitigation measures. In addition, the comment letter states that any work performed within a Caltrans right-of-way or the use of oversized transport vehicles on State highways will require discretionary approval. Lastly, the commenter recommends that construction traffic be limited to off-peak periods and that large-size truck travel be limited to off-peak commute hours and should a construction traffic	Section 5.9, <i>Transportation</i>

Comment Letter and Commenter	Relevant Draft EIR Sections
control plan should be submitted if construction traffic is expected to impact State facilities.	
Regional Agencies	
South Coast Air Quality Management District (SCAQMD), June 12, 2024	
This letter requests that the South Coast Air Quality Management District (SCAQMD) receive a copy of the Draft EIR upon its completion, including all technical appendices related to air quality, health risk, and greenhouse gas emissions and electronic versions of all emission calculation spreadsheets, air quality modeling, and health risk assessment input and output files. SCAQMD recommends that the Lead Agency use SCAQMD's CEQA Air Quality Handbook and website as guidance when preparing air quality and greenhouse gas analyses and use the California Emissions Estimator Model for emissions modeling. SCAQMD recommends all emissions be calculated and compared to SCAQMD's regional pollutant thresholds and localized significance thresholds. The comment acknowledges that SCAQMD should be identified as a Responsible Agency if the Project requires a permit from SCAQMD. SCAQMD is concerned about potential health risk impacts of siting warehouses within close proximity of sensitive land uses and the area surrounding the Project has an estimated cancer risk of over 520 in one million based on the MATES V Carcinogenic Risk interactive map. The comment states that if the Project results in significant air quality impacts, the DEIR should analyze mitigation measures and lists the following possible measures for consideration: • Requiring zero-emissions or near-zero emissions on-road haul trucks • Limit the daily number of trucks allowed to the number analyzed in the EIR • Provide EV charging stations or electrical infrastructure for future EV charging stations • Maximize use of solar energy by installing solar arrays • Use light colored roofing and paving materials • Utilize only Energy Star appliances • Use of water based or low VOC cleaning products that go beyond requirements of SCAQMD Rule 1113 • Clearly mark truck routes with signs so trucks will not travel next to or near sensitive land uses • Design the Project so that truck entrances and exits are not facing sensitive receptors • Design the Project so that any check-in point for trucks is inside Project boundaries to ensure no trucks are queuing outside • Design the Project so that any truck traffic inside the Project is located as far away from sensitive receptors as possible • Provide overnight truck parking inside the Project	Section 5.1, <i>Air Quality</i> Section 5.2, <i>Energy</i> Section 5.4, <i>Greenhouse Gas Emissions</i> Section 5.8, <i>Noise</i>

Comment Letter and Commenter	Relevant Draft EIR Sections
Implement building filtration systems with MERV 13 or better The letter states that SCAQMD has adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 316 – Fees for Rule 2305, which will reduce regional and local emissions of nitrogen oxides and particulate matter, including diesel particulate matter. SCAQMD recommends that the Lead Agency review Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional Project requirements and CEQA mitigation measures can be identified and implemented at the proposed Project that may help future warehouse operators meet their compliance obligation.	
Organization Comments	
Supporters Alliance for Environmental Responsibility (SAFER), May 21, 2024	
This letter requests that SAFER be notified by email or mail of any and all actions or hearings related to the Project including: - Notice of any public hearing in connection to the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091. - Any and all notices prepared for the Project pursuant to the California Environmental Quality Act (“CEQA”). The comment letter concludes with a reiterated statement that SAFER is requesting to be notified of CEQA actions and notified of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law. In addition, the comment letter states that the request is being filed pursuant to Public Resources Code Sections 21092.2 and 21167(f), and Government Code Section 65092, which require local counties to mail such notices to any person who has filed a written request for them with the clerk of the agency’s governing body.	All sections.

2.3.2 Public Scoping Meeting

Pursuant to Section 15082(c)(1) of the CEQA Guidelines, the City of Santa Fe Springs hosted a public scoping meeting for members of the public and public agencies to provide input as to the scope and content of the environmental information and analysis to be included in the Draft EIR for the Project. A scoping meeting was held on May 22, 2024, at the Santa Fe Springs City Council Chambers located at 11710 East Telegraph Road, Santa Fe Springs, California 90670. No public comments were received during the scoping meeting.

2.3.3 Draft EIR

Topics requiring a detailed level of analysis that are evaluated in this Draft EIR have been identified based upon the responses to both the IS/NOP and a review of the Project by the City. Pursuant to State CEQA Guidelines Section 15125.5(a) which states that, “[a]n EIR shall identify and focus on the significant effects on the environment,” the City of Santa Fe Springs determined that Project impacts on the below topics would

not be significant. Consequently, these topics are not analyzed in this Draft EIR, but are further discussed in Section 7.0, *Effects Found Not to be Significant*.

- Aesthetics
- Agriculture and Forestry Resources
- Biological Resources
- Cultural Resources
- Land Use and Planning
- Population and Housing
- Public Services
- Recreation
- Wildfire

The City of Santa Fe Springs has filed a Notice of Completion (NOC) with the Governor's Office of Planning and Research State Clearinghouse, indicating that this Draft EIR has been completed and is available for review and comment. The Project does not meet the definition of a project of statewide, regional, or areawide significance pursuant to Section 15206 of the CEQA Guidelines. A Notice of Availability (NOA) of the Draft EIR was published concurrently with distribution of this document. The Draft EIR is being circulated for review and comment by the public and other interested parties, agencies, and organizations for 45 days in accordance with State CEQA Guidelines Sections 15087 and 15105. During the 45-day review period, the Draft EIR is available for public review digitally on the City of Santa Fe Springs's website at https://www.santafesprings.org/departments/planning_and_development_department/planning/environmental_documents.php or physically at the following location:

City of Santa Fe Springs
11710 East Telegraph Road
Santa Fe Springs, California 90670

Written comments related to environmental issues in the Draft EIR should be addressed to:

Jimmy Wong, Associate Planner
City of Santa Fe Springs Planning Department
11710 East Telegraph Road
Santa Fe Springs, California 90670
jimmywong@santafesprings.org

2.3.4 Final EIR

Upon completion of the 45-day review period, written responses to all comments related to the environmental issues in the Draft EIR will be prepared and incorporated into a Final EIR. The written responses to comments will be made available at least 10 days prior to the public hearing at which the certification of the Final EIR will be considered by the City of Santa Fe Springs. These comments, and their responses, will be included in the Final EIR for consideration by the City of Santa Fe Springs, as well as other responsible and trustee agencies per CEQA. The Final EIR may also contain corrections and additions to the Draft EIR and other information relevant to the environmental issues associated with the Project. The Final EIR will be available for public review prior to its certification by the City of Santa Fe Springs. Notice of the availability of the Final EIR will be sent to all who comments on the Draft EIR.

2.4 ORGANIZATION OF THIS DRAFT EIR

This Draft EIR is organized into the following Sections. To help the reader locate information of interest, a brief summary of the contents of each chapter is provided.

- **Section 1, Executive Summary:** This section provides a brief summary of the Project area, the Project, and alternatives. This section also provides a summary of the potential environmental impacts and mitigation measures, applicable Project design features, applicable regulatory requirements, and the

level of significance after implementation of the mitigation measure. The level of significance after implementation of the proposed mitigation measure(s) will be characterized as either *less than significant* or *significant and unavoidable*.

- **Section 2, Introduction:** This section provides an overview of the purpose and use of the EIR, the scope of this Draft EIR, a summary of the legal authority for the Draft EIR, a summary of the environmental review process, and the general format of this document.
- **Section 3, Project Description:** This section provides a detailed description of the Project, its objectives, and a list of Project-related discretionary actions.
- **Section 4, Environmental Setting:** This section provides a discussion of the existing conditions within the Project area.
- **Section 5, Environmental Impact Analysis:** This section is divided into sub-sections for each environmental impact area. Each section includes a summary of the existing statutes, ordinances, and regulations that apply to the environmental impact area being discussed; the analysis of the Project's direct and indirect environmental impacts on the environment, including potential cumulative impacts that could result from the Project; applicable Project design features, standard conditions, and plans, policies, and programs that could reduce potential impacts; and feasible mitigation measures that would reduce or eliminate the significant adverse impacts identified. Impacts that cannot be mitigated to *less than significant* are identified as *significant and unavoidable*.
- **Section 6, Other CEQA Considerations:** This section summarizes the significant and unavoidable impacts that would occur from implementation of the Project and provides a summary of the environmental effects of the implementation of the Project that were found not to be significant. Additionally, this section provides a discussion of various CEQA-mandated considerations including growth-inducing impacts and the identification of significant irreversible changes that would occur from implementation of the Project. In addition, this section provides a discussion of impacts found not to be significant.
- **Section 7, Effects Found Not to be Significant:** This section summarizes the potential environmental effects related to the Project that were determined not to be significant during preparation of this EIR.
- **Section 8, Alternatives:** This section describes and analyzes a reasonable range of alternatives to the Project. The CEQA-mandated No Project Alternative is included along with alternatives that would reduce one or more significant effects of the proposed Project. As required by the CEQA Guidelines, the environmentally superior alternative is also identified.
- **Section 9, Report Preparation and Persons Contacted:** This section lists authors of the Draft EIR and City of Santa Fe Springs staff that assisted with the preparation and review of this document. This section also lists other individuals and/or organizations that were contacted for information that is included in this Draft EIR document.

2.5 INCORPORATION BY REFERENCE

State CEQA Guidelines Section 15150 allows for the incorporation “by reference all or portions of another document... most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of a problem at hand.” The purpose of incorporation by reference is to assist the Lead Agency in limiting the length of this Draft EIR. Where this Draft EIR incorporates a document by reference, the document is identified in the body of the Draft EIR, citing the appropriate section(s) of the incorporated document and describing the relationship between the incorporated part of the referenced document and this Draft EIR.

The Project is within the geographical limits of the City of Santa Fe Springs and is covered by the Santa Fe Springs 2040 General Plan. The General Plan was approved by the City on February 8, 2022, and provides the fundamental basis for the City of Santa Fe Springs land use and development policies. The Santa Fe Springs 2040 General Plan was the subject of an environmental review under CEQA, and an EIR

for the Santa Fe Springs 2040 General Plan was certified by the City of Santa Fe Springs in 2022 (State Clearinghouse Number 2021050193). Accordingly, the EIR for the Santa Fe Springs 2040 General Plan is herein incorporated by reference with State CEQA Guidelines Section 15150. The documents are available at:

https://www.santafesprings.org/departments/planning_and_development_department/planning/planning_handouts_and_maps.php#outer-136 .

3. Project Description

3.1 INTRODUCTION

Consistent with the requirements of State CEQA Guidelines Section 15124, this section provides a description of the proposed Project, including the following:

1. Project's location and boundaries;
2. Project's statement of objectives;
3. Project's technical, economic, and environmental characteristics; and
4. Discretionary approvals and permits.

A "Project," as defined by State CEQA Guidelines Section 15378(a), means the following:

[T]he whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following: An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land ... enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans.

3.2 PROJECT LOCATION

The proposed NWC Telegraph and SFS Project (the Project, or proposed Project) is located within the central portion of the City of Santa Fe Springs, at the northwest corner of Santa Fe Springs Road and Telegraph Road. Santa Fe Springs is located approximately 13 miles from Downtown Los Angeles, 39 miles from Downtown Riverside, and 14 miles from Long Beach. Regional access to the Project site is provided by Interstate 5 (I-5), Interstate 605 (I-605), and State Route 72 (SR-72). Local access to the Project site is provided via Telegraph Road and Santa Fe Springs Road.

The Project site is located within an unsectioned portion of Township 3 South, Range 11 West of the Whittier, California, United States Geological Survey (USGS) 7.5-minute Quadrangle. The Project site consists of one parcel encompassing approximately 26.77 acres and is generally located north of Telegraph Road, west of Santa Fe Springs Road, north of McCann Drive, and east of Norwalk Boulevard. The site is identified by Assessor's Parcel Number 8005-015-051. The Project site and surrounding area are shown in Figure 3-1, *Regional Location*, and Figure 3-2, *Local Vicinity*.

3.3 EXISTING CONDITIONS

The Project site is currently heavily disturbed from existing and previous oil well construction and operational activities. The site contains one single-story 3,310-square-foot (SF) office building on the westernmost portion and a 1,282 SF canopy structure to the northeast of the building that is used to cover construction equipment. The remainder of the site consists of land utilized for oil extraction. The site contains over 100 active, plugged, idle, and/or cancelled oils wells, and six pumpjacks along with tanks, pipes, and associated infrastructure. The Project site is relatively flat and mostly unvegetated, except for a sparse nonnative herbaceous layer and one nonnative tree at the southeast corner of the site.

The site is currently accessible via three driveways. One driveway is located on Telegraph Road and two driveways are located on Santa Fe Springs Road. The Project site's existing conditions are shown in Figure 3-3, *Aerial View*, and Figure 3-4, *Existing Site Photos*.

3.3.1 Existing Land Use and Zoning

The Project site has a General Plan land use designation of Industrial, as shown in Figure 3-5, *Existing General Plan Land Use*, and a zoning designation of Heavy Manufacturing (M-2), as shown in Figure 3-6, *Existing Zoning*. The Industrial land use designation is intended to provide locations for general industrial, manufacturing, outdoor storage, and logistic activities at a maximum floor area ratio (FAR) of 0.75. The M-2 zone district provides sites for heavy industrial uses, oil and gas drilling, select manufacturing operations, salvage operations, automobile and truck services, and similar compatible uses (Santa Fe Springs Municipal Code Section 155.241). Warehouse uses are permitted within the M-2 zone.

3.3.2 Surrounding General Plan and Zoning Designations

The surrounding land uses are described in Table 3-1 along with the General Plan land use and zoning designations.

Table 3-1: Surrounding Existing Land Use and Zoning Designations

	Existing Land Use	General Plan Designation	Zoning Designation
North	Industrial development	Industrial	Heavy Manufacturing (M-2)
East	Industrial development	Industrial and Light Industrial	Light Industrial (M-1) and Heavy Manufacturing (M-2)
South	One industrial building, oil and gas extraction, followed by Telegraph Road	Industrial, Light downtown	Light Industrial (M-1), Heavy Manufacturing (M-2) and Mixed-Use-Downtown (MU-DT)
West	Oil and gas extraction, followed by Santa Fe Springs Road and industrial development:	Industrial	Heavy Manufacturing (M-2)

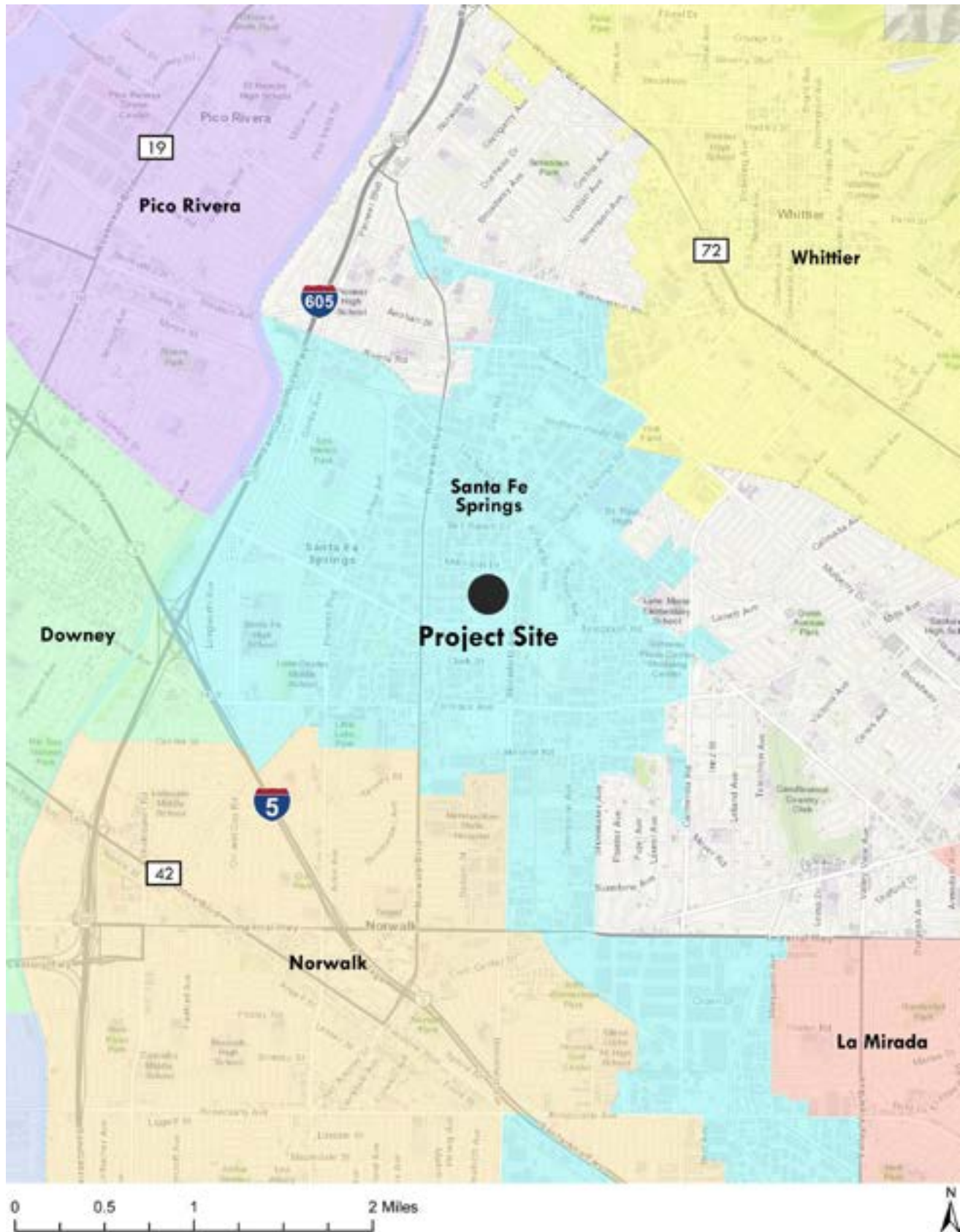
3.4 PROJECT OBJECTIVES

The Project site plan has been designed to meet a series of Project-specific objectives that have been carefully crafted in order to aid decision makers in their review of the Project and its associated environmental impacts. The primary purpose and goal of the Project is to redevelop an underutilized property with an industrial use to provide an employment-generating use to help grow the economy in the City of Santa Fe Springs. The Project would achieve this goal through the following objectives:

1. To make efficient use of an underutilized property in the City of Santa Fe Springs by redeveloping it with a modern industrial warehouse that adds to its potential for employment-generating uses and that aligns with the City's General Plan and zoning designations.
2. To redevelop an underutilized property with an industrial warehouse building near Interstate 5 and Interstate 605, to help meet demand for logistics business in the City and surrounding region.
3. To attract new business and employment to the City of Santa Fe Springs and thereby promote economic growth.
4. To build an industrial warehouse project in the City of Santa Fe Springs that is compatible with the surrounding industrial and manufacturing uses that were recently built or recently approved for construction in the City of Santa Fe Springs.

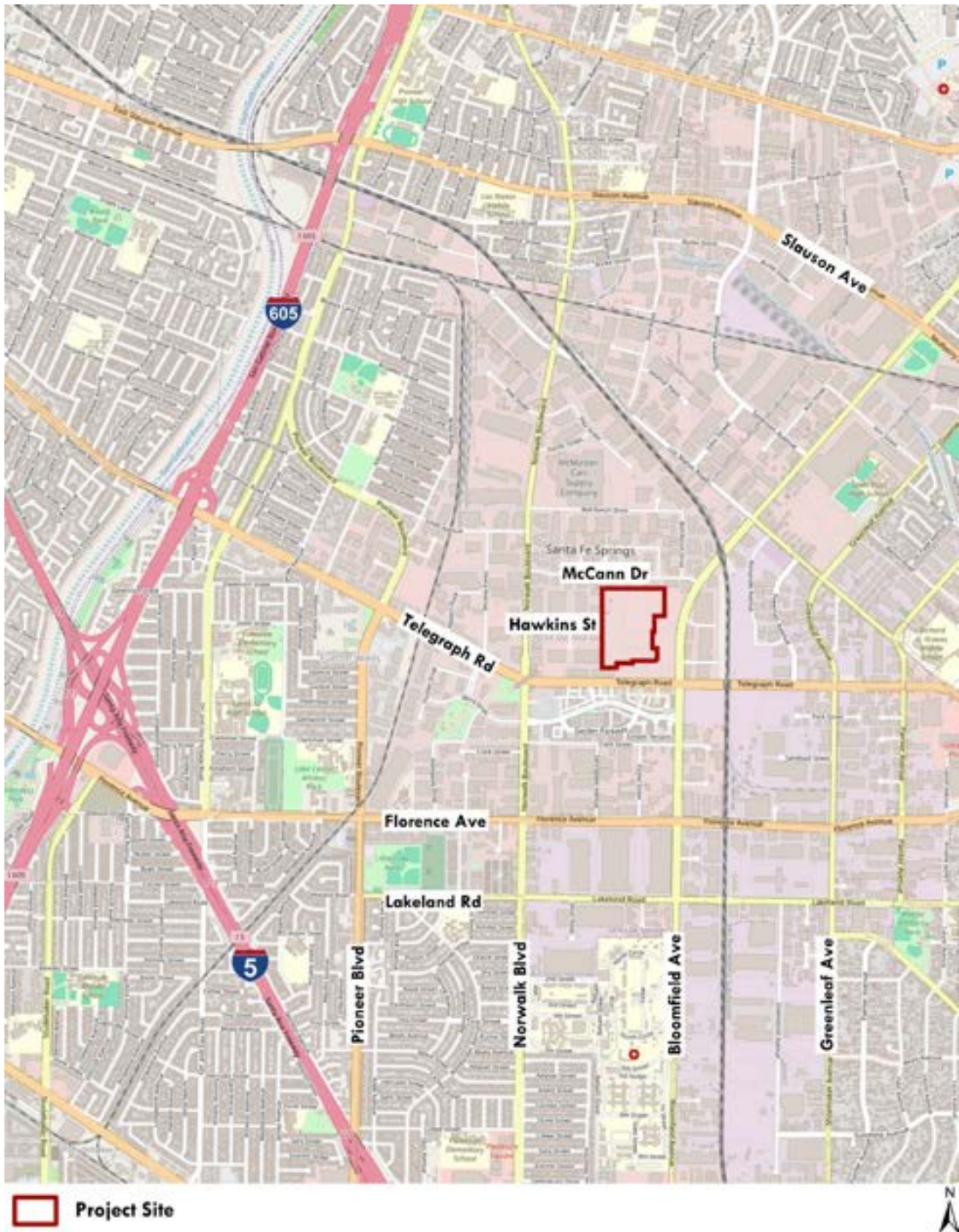
This page intentionally left blank.

Regional Location



This page intentionally left blank.

Local Vicinity



This page intentionally left blank.

Aerial View



This page intentionally left blank.

Site Photos



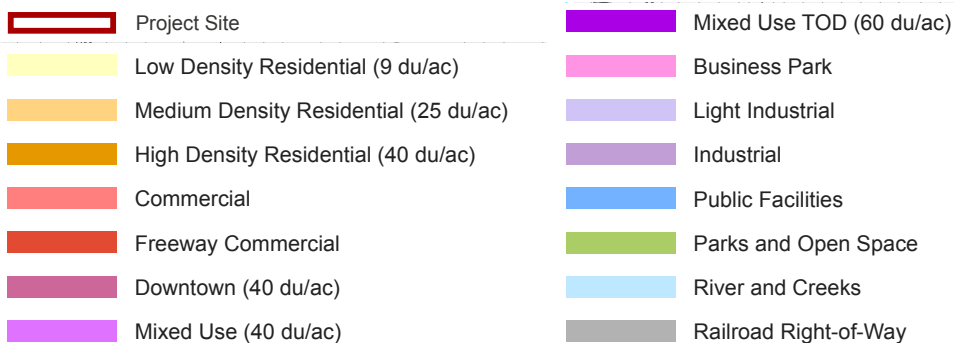
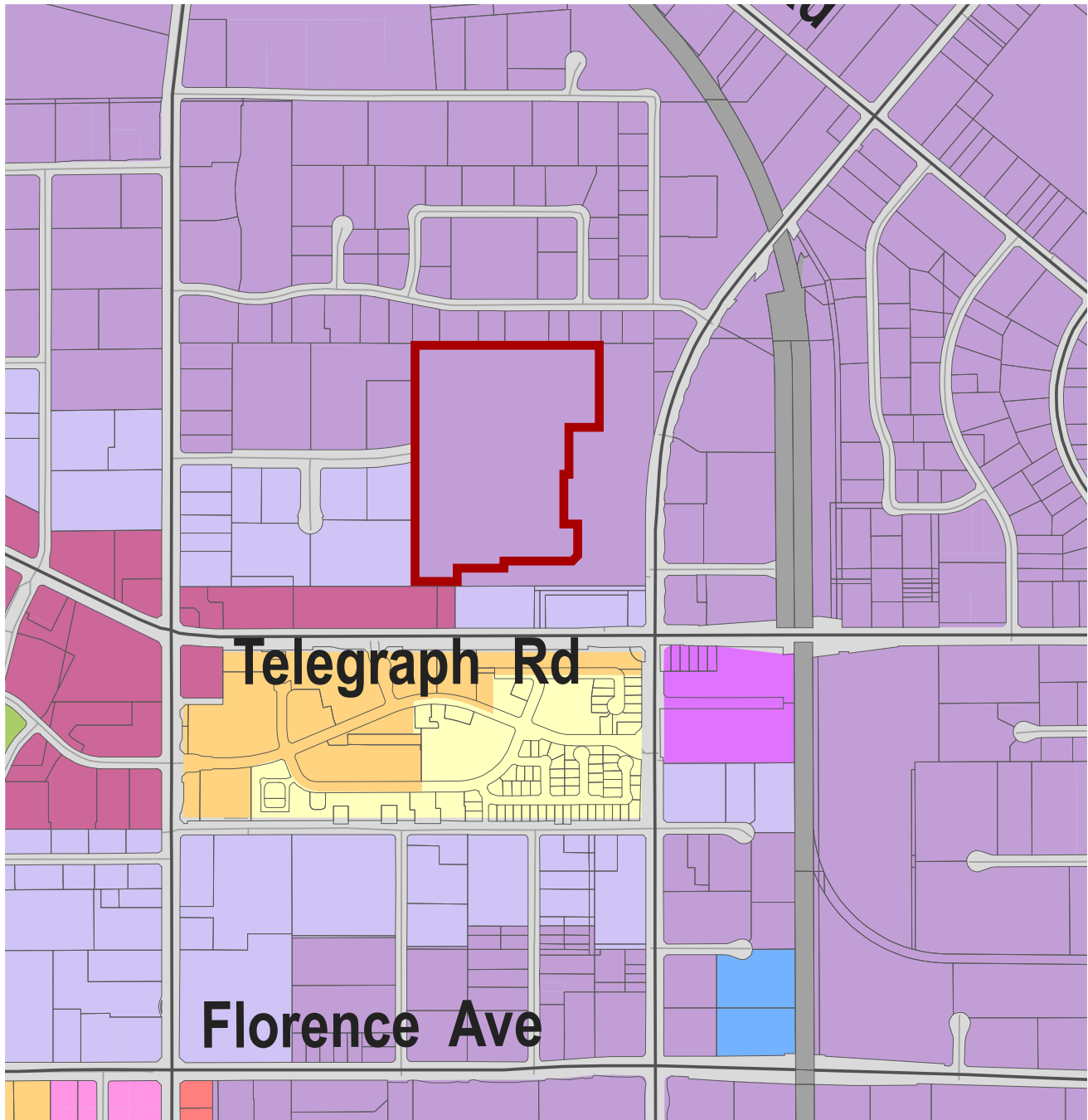
View of the site from Hawins St on the west side of the project site.



Access to the project site from the east side of site on Santa Fe Springs Rd.

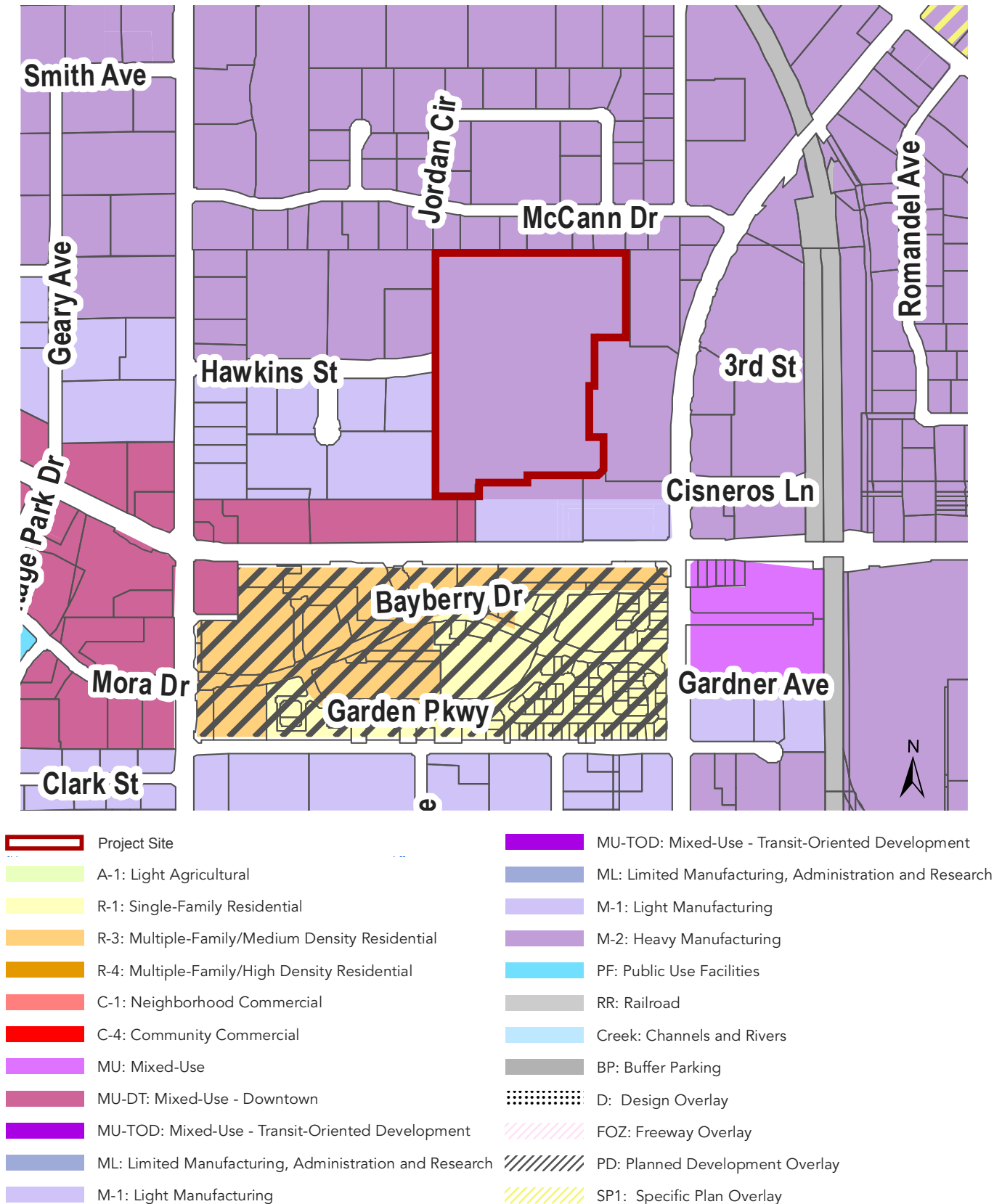
This page intentionally left blank.

Existing General Plan Land Use



This page intentionally left blank.

Existing Zoning



This page intentionally left blank.

3.5 DESCRIPTION OF THE PROJECT

3.5.1 Project Overview

The Project proposes to subdivide the approximately 26.77-acre parcel into two parcels that would be approximately 13.45 acres and 13.09 acres. The proposed Project would demolish the existing building and other structures onsite, cease existing oil well activity and abandon the existing onsite oil wells, and to construct and operate two new warehouse buildings with parking, landscaping, and access improvements. The proposed Building 1 would be approximately 298,373 square feet (SF) with a FAR of 0.51. The proposed Building 2 would be approximately 286,305 SF with a FAR of 0.49. Additional improvements include two proposed underground onsite infiltration trenches, parking, loading docks, decorative landscaping, associated onsite infrastructure, and construction of a cul-de-sac driveway.

The conceptual site plan is provided as Figure 3-7, *Conceptual Site Plan*. Abandonment of the oil wells would be conducted pursuant to the requirements listed under Sections 117.129 and 117.130 of the Santa Fe Springs Municipal Code.

3.5.2 Project Features

Building and Architecture

The proposed Project consists of two new concrete tilt-up industrial warehouse buildings with a combined total building area of 584,678 SF and a combined total footprint of 564,678 SF. Building 1 would be located in the northern portion of the site on Parcel 1 and would have a total building area of 298,373 SF, inclusive of 5,000 SF of office space and 5,000 SF of mezzanine area. Building 1 would be one story and would have a maximum height of 52 feet. Building 1 would include a 78-foot and 3-inch setback from the western property line, a 73-foot setback from the northern property line, and a 73-foot setback from the eastern property line.

Building 2 would be located on the southern portion of the site on Parcel 2 and would have a total building area of 286,305 SF, inclusive of 5,000 SF of office space and 5,000 SF of mezzanine area. Building 2 would be one story and would have a maximum height of 52 feet. Building 2 would include a 78-foot and 3-inch setback from the western property line, a 31-foot setback from the southern property line, and a 31-foot setback from the eastern property line.

As shown in Figures 3-8, *Elevations A*, and 3-9, *Elevations B*, the proposed buildings would be shades of white and grey with blue glazing.

Parking and Loading Docks

Building 1 would include a total of 345 parking stalls, inclusive of 8 accessible stalls, located along the west, north, and east sides of the building. In addition, bicycle racks would be installed near the office entrances located at the southwest and southeast corners of the building, providing 19 spaces for bicycle parking. Building 1 would include 40 dock doors and 48 truck trailer stalls located along the south side of the building.

Building 2 would include a total of 339 parking stalls, inclusive of 8 accessible stalls, located along the west, south, and east sides of the building. In addition, a bicycle rack would be installed near the office entrances located at the northwest and southeast corners of the building, providing 18 spaces for bicycle parking. Building 2 would include 36 dock doors and 33 truck trailer stalls located along the north side of the building.

Landscaping, Fencing, and Walls

The proposed Project includes approximately 46,601 SF (1.07 acres) of landscaping on the parcel for Building 1 and 38,540 SF (0.88 acres) of landscaping on the parcel for Building 2, for a total of 85,141 SF (1.96 acres) of landscaping on the Project site, as shown in Figure 3-10, *Conceptual Landscape Plan*. Proposed landscaping would include 24-inch and 36-inch box trees, various shrubs, and groundcover. Landscape would be installed around the perimeter of the Project site, and throughout the parking areas, to screen the proposed buildings from public viewpoints.

A new 8-foot-high tube steel fence would be implemented along the southwestern, western, northern, and northeastern property line, which would connect to the existing tube steel fence along the southeastern property line. The truck court would be secured by a 14-foot-high concrete screen wall with two 10-foot-high tube steel sliding gates on the western side and one 10-foot-high tube steel sliding gate on the eastern side.

Access and Circulation

Site access would be provided from two existing driveways and one proposed cul-de-sac driveway, as shown in Figure 3-11, *Circulation and Driveways*. The existing driveways located south of the Project site along Telegraph Road and east of the Project site along Santa Fe Springs Road are 28 feet wide. The proposed 64-foot-wide cul-de-sac driveway would be located west of the Project site, from Hawkins Street and would split into two 56-foot-wide onsite driveways.

Building 1 would be accessible via two driveways: the proposed 64-foot-wide driveway on Hawkins Street and the existing 28-foot-wide driveway on Santa Fe Springs Road. The proposed 64-foot-wide cul-de-sac driveway on Hawkins Street would allow for both automobile and truck access. The existing 28-foot-wide driveway on Santa Fe Springs Road would be restricted to left-in/right-in and right-out turns and would be accessible to automobiles. This access point would be via a reciprocal access agreement with the adjacent property owner(s).

Building 2 would be accessible via two driveways: the proposed 64-foot-wide driveway on Hawkins Street and the existing 28-foot-wide driveway on Telegraph Road. The proposed 64-foot-wide cul-de-sac driveway on Hawkins Street would allow for both automobile and truck access. The existing 28-foot-wide driveway on Telegraph Road would be restricted to right-in and right-out turns and would be accessible to automobiles. This access point would be via a reciprocal access agreement with the adjacent property owner(s).

Each building would be designed to function independently. However, the Project includes installation of a shared 26 to 31-foot-wide drive aisle for internal circulation. Access to the truck loading dock areas would be controlled by gates equipped with Knox pad locks for fire department access.

Sidewalk Improvements

The proposed cul-de-sac driveway (detailed previously) would include construction of an approximately 11-foot sidewalk. The proposed sidewalk would connect to the existing sidewalk on Hawkins Street, east of the Project site, on both sides of the street.

Infrastructure Improvements

Energy and Communications Utilities

The Project would install underground electric and communication lines that would connect to existing infrastructure which would also be undergrounded near the northern property line as part of the Project.

Water and Sewer

The Project site is located within the water service area of the Santa Fe Springs Water Utility Authority (SFSWUA) and the wastewater service area of Los Angeles County Sanitation Districts (LACSD). The proposed Project includes new domestic, fire, and irrigation water service lines that would connect to the existing 12-inch water main within Hawkins Street (west of the Project site). The existing water main lines are within the streets surrounding the Project site, and therefore, no water line extensions would be required.

The proposed Project would include installation of new onsite and offsite sewer lines. Proposed 6-inch sewer laterals would be located on the western portion of the site and would connect to a proposed 8-inch sewer main within Hawkins Street. The proposed 8-inch sewer main would extend approximately 250 feet west of the Project site and connect to the existing 8-inch main line in Hawkins Street. The proposed water and sewer improvements are shown in Figure 3-12, *Utility Improvements*.

Drainage

The proposed Project would include construction of an onsite drainage system. The Project proposes to install several inlets and onsite drainage pipes to convey site runoff to two proposed underground onsite infiltration trenches that would filter and infiltrate storm water into the site soils and potentially into the groundwater. The two infiltration trenches would be 200 feet by 80 feet and 200 feet by 78 feet and would be located underground below the trailer stalls area, between Building 1 and Building 2.

As required by existing regulations, the Proposed onsite drainage infrastructure would have capacity to retain 85 percent of the Project site's Design Capture Volume (DCV). Overflow for both infiltration trenches will be conveyed to the existing storm drain along the site's eastern boundary, below Hawkins Street. Implementation of the Project would maintain existing drainage patterns of the Project site.

3.5.3 Construction

Construction activities for the Project would occur over an approximately 18-month period and would include abandonment of the onsite oil wells and demolition, site preparation, grading, building construction, paving, and architectural coatings. During the grading phase, 126,929 CY of soil would be imported, and 25,000 CY of contaminated soil would be exported. Construction would occur within the hours allowable by the Santa Fe Springs Municipal Code Section 155.424, between 7:00 a.m. and 7:00 p.m. Table 3-2 provides the anticipated construction schedule.

Table 3-2: Proposed Project Construction Schedule

Activity	Total Days
Demolition	5
Site Preparation	10
Grading	100
Building Construction	220
Paving	20

Architectural Coating	40

3.5.4 Operations

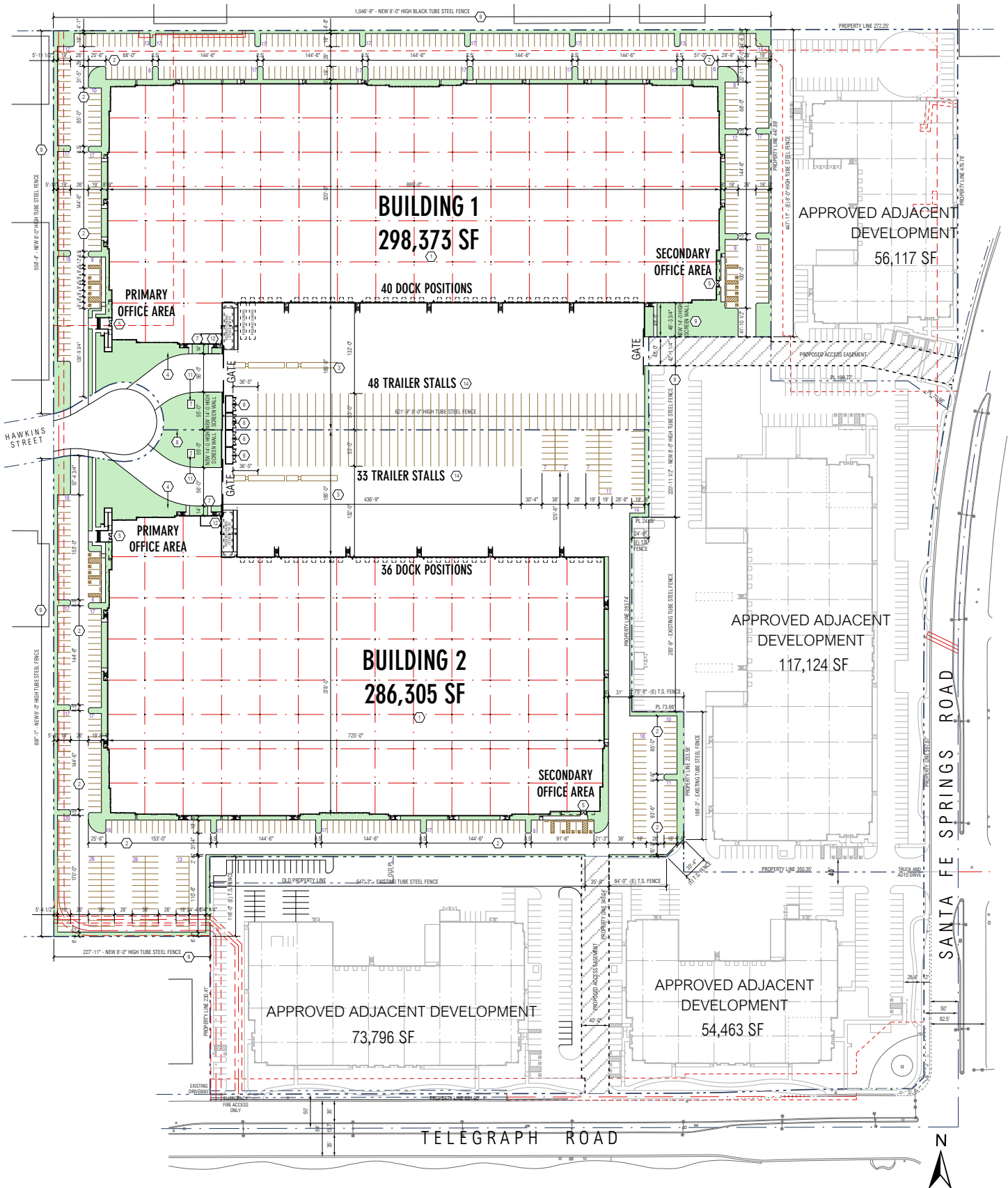
The proposed Project would operate two warehouse buildings, the tenants of which are currently unknown. For the purpose of providing a conservative CEQA review, the analysis assumes that the buildings would operate as 80 percent high-cube fulfillment warehouse, 10 percent high-cube cold storage, and 10 percent manufacturing. In order to provide a conservative environmental analysis, operations were assumed to be 24 hours a day, 7 days a week, with exterior loading and parking areas illuminated at night. Lighting would be subject to City Municipal Code Section 155.496, *Lighting of Parking Areas*, which states that any lighting used to illuminate off-street parking facilities or shall be so arranged as to reflect the light away from the adjoining premises in any residential zone.

The Project is expected to begin operation in the second quarter of 2027. Typical operational characteristics would include employees traveling to and from the site, delivery of materials and supplies to the site, and truck loading and unloading. The buildings would be designed such that business operations would be conducted entirely within the buildings, with the exception of traffic movement, parking, trailer connection and disconnection, storage, and the loading and unloading of trailers. The outdoor cargo handling equipment used during loading and unloading of trailers (e.g., yard trucks, hostlers, yard goats, pallet jacks, forklifts) would be non-diesel powered, in accordance with contemporary industry standards.

Dock doors on the warehouse building would not be occupied by a truck at all times of the day. There are typically many more dock door positions on warehouse buildings than are needed for receiving and shipping volumes. The dock doors that are in use at any given time are usually selected based on interior building operation efficiencies (i.e., trucks dock closest to where the goods carried by the truck are stored inside the warehouse). As a result, many dock door positions are frequently inactive throughout the day. Pursuant to State law, on-road diesel-fueled trucks are required to comply with air quality and greenhouse gas emission standards, including but not limited to the type of fuel used, engine model year stipulations, aerodynamic features, and idling time restrictions of no more than 5 minutes.

This page intentionally left blank.

Conceptual Site Plan

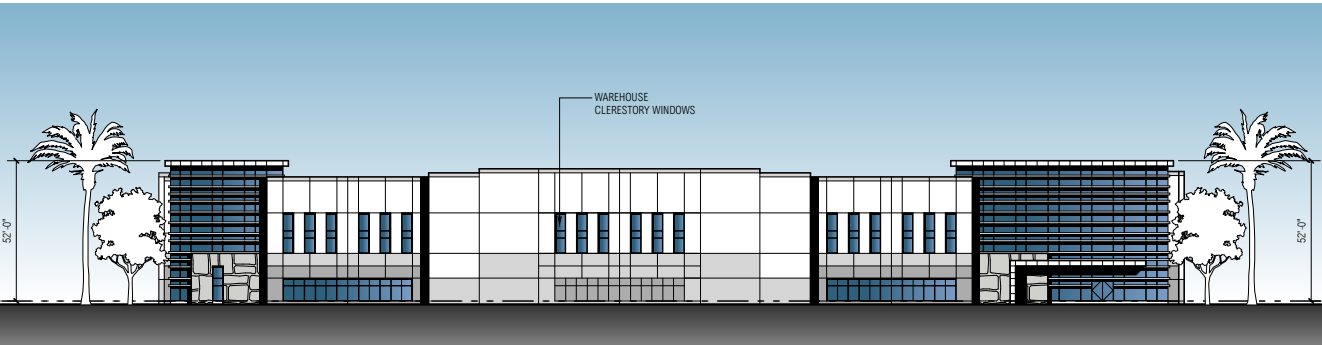


NWC Telegraph and SFS
City of Santa Fe Springs

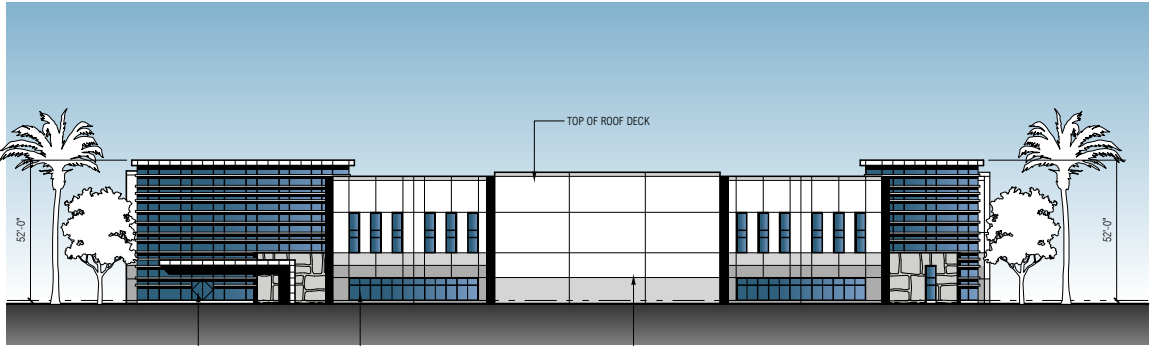
Figure 3-7

This page intentionally left blank.

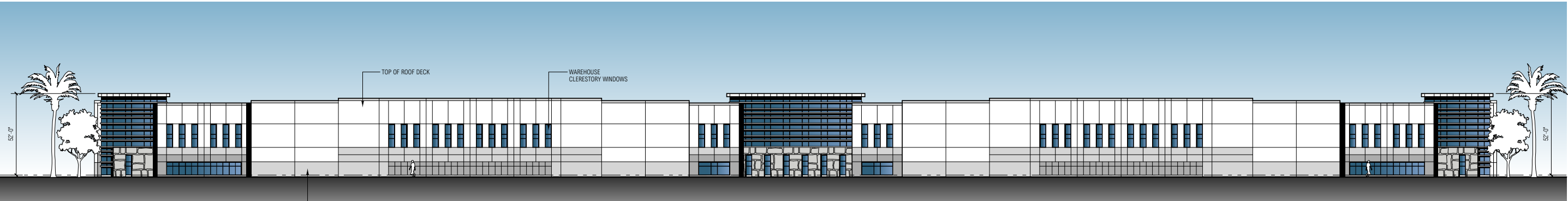
Elevations A



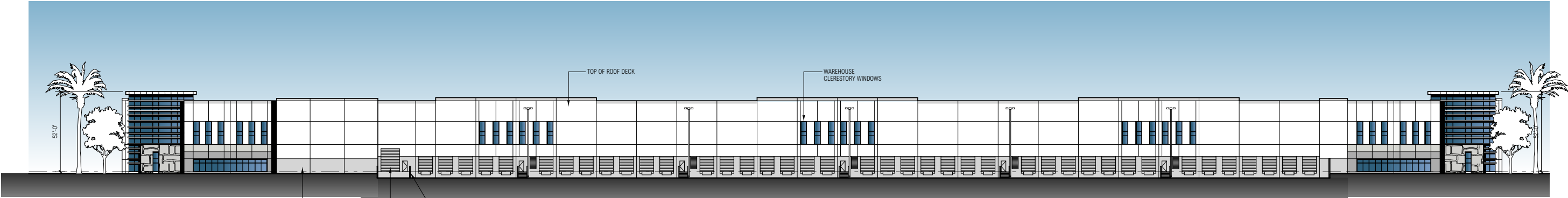
WEST ELEVATION
SCALE: 1" = 30'-0"



EAST ELEVATION
SCALE: 1" = 30'-0"



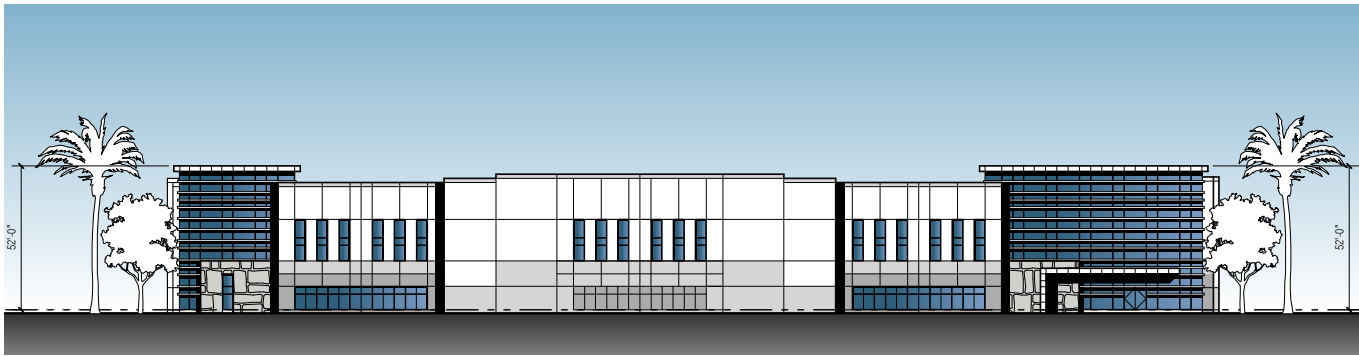
NORTH ELEVATION
SCALE: 1" = 30'-0"



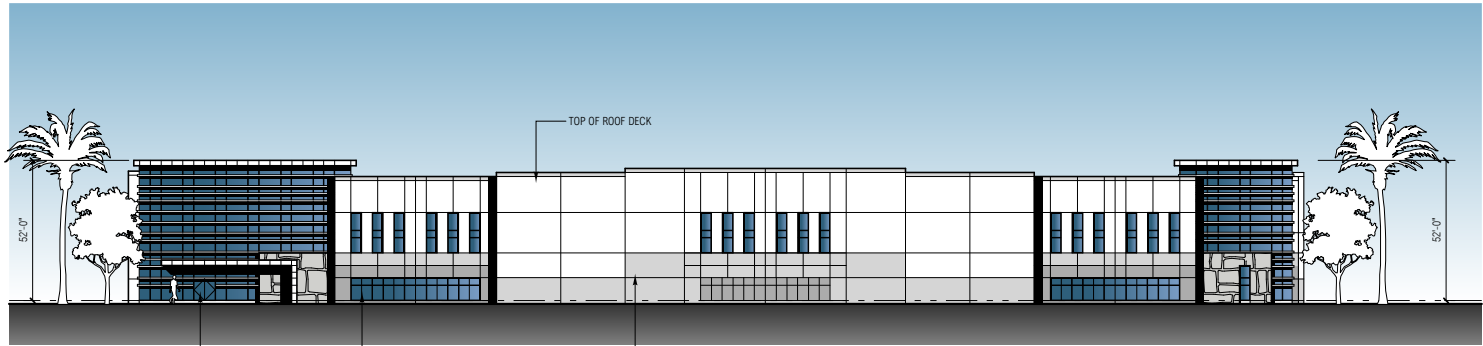
SOUTH ELEVATION
SCALE: 1" = 30'-0"

This page intentionally left blank.

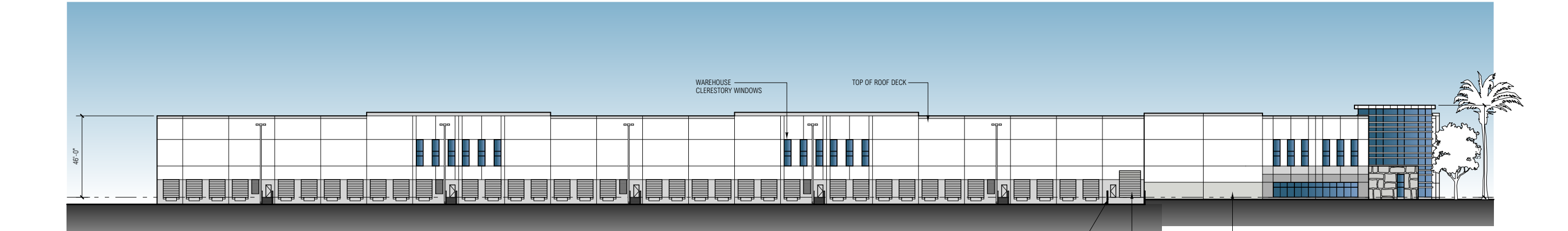
Elevations B



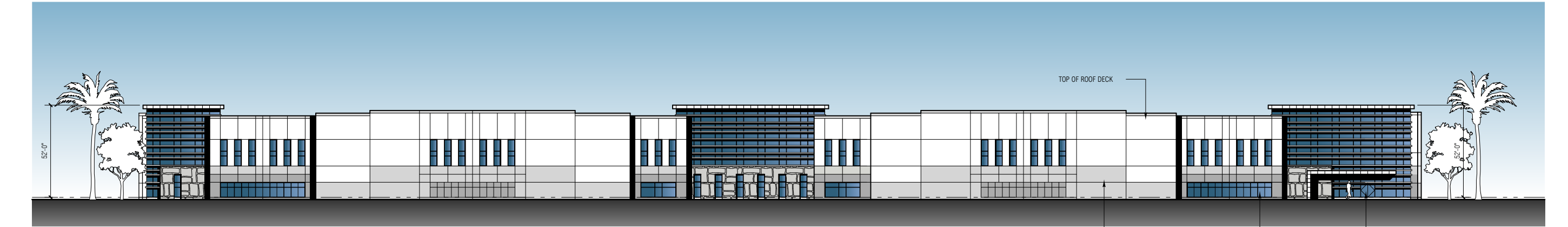
WEST ELEVATION
SCALE: 1" = 30'-0"



EAST ELEVATION
SCALE: 1" = 30'-0"



NORTH ELEVATION
SCALE: 1" = 30'-0"



SOUTH ELEVATION
SCALE: 1" = 30'-0"

This page intentionally left blank.

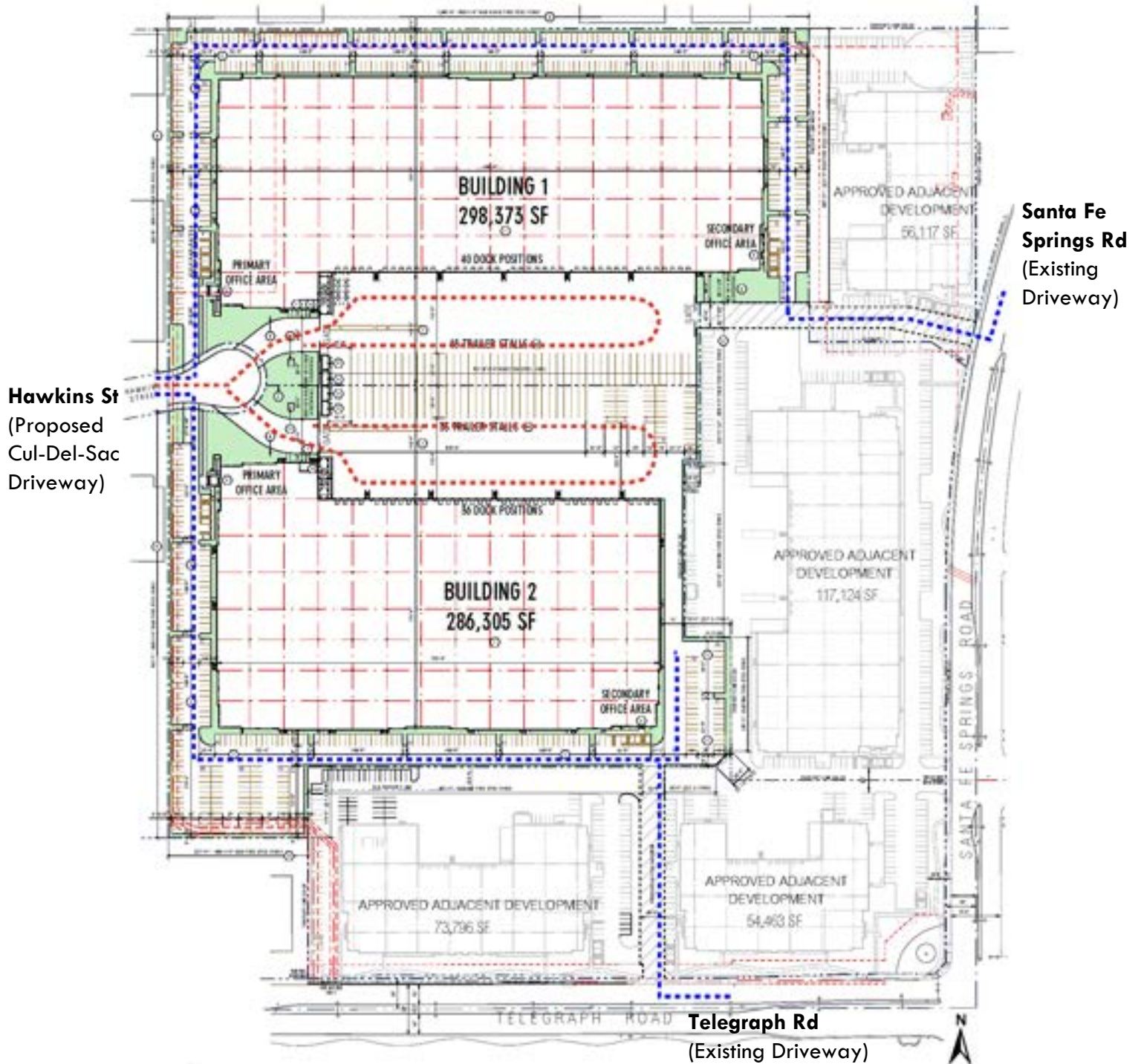
CONCEPT PLANT SCHEDULE



Figure 3-10

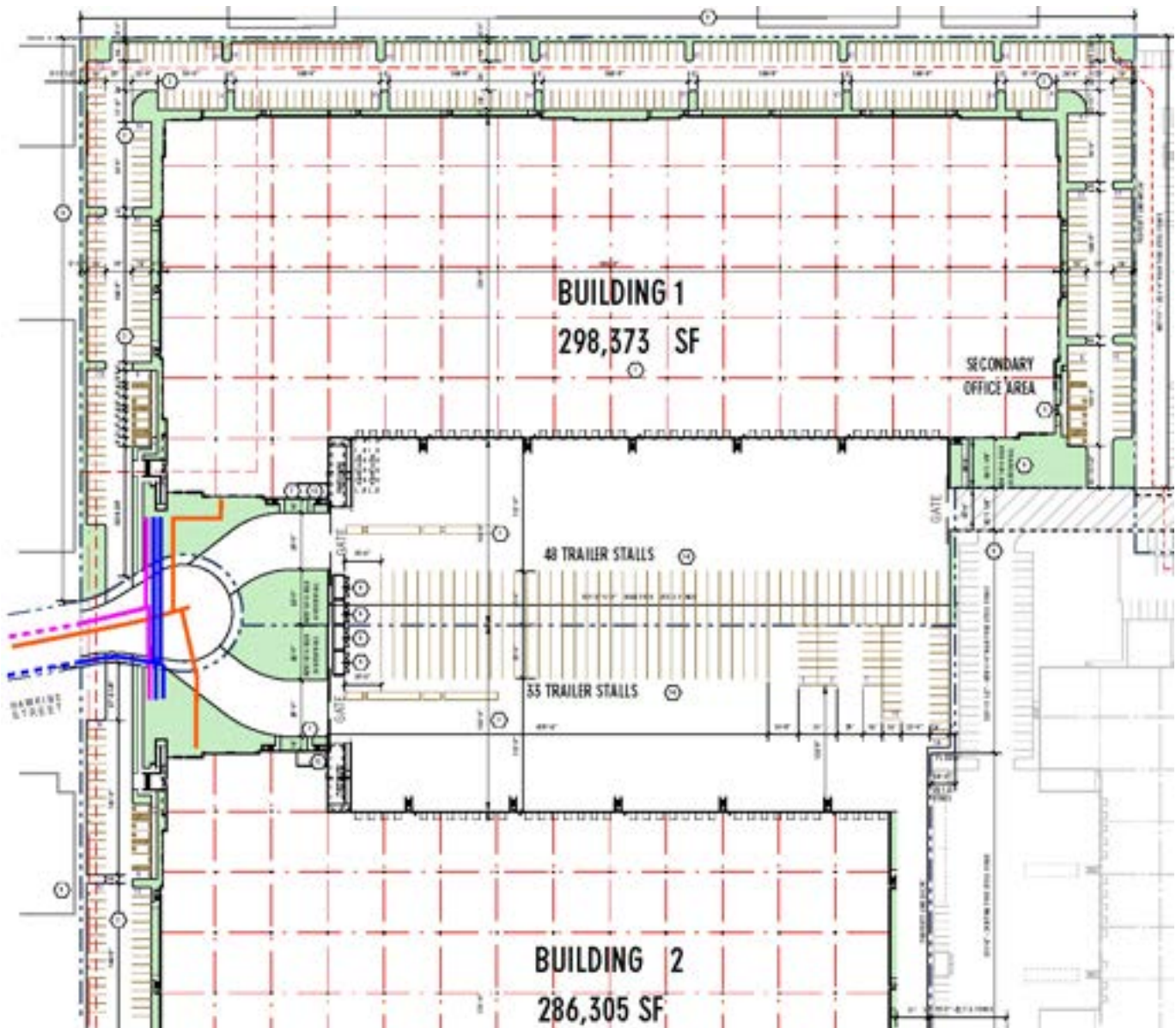
This page intentionally left blank.

Circulation and Driveways



This page intentionally left blank.

Utility Improvements



Legend

- Existing Reclaimed Water Line
- Existing Water Line
- Proposed Reclaimed Water Line
- Proposed Water Line
- Proposed Sewer Line

This page intentionally left blank.

Project Design Features and Existing Plans, Programs, or Policies

Throughout the impact analysis in this Draft EIR, reference is made to existing Plans, Programs, or Policies (PPPs) currently in place which effectively reduce environmental impacts. Where applicable, PPPs are listed to show their effect in reducing potential environmental impacts. The Project applicant has incorporated into the Project various sustainable design features, as detailed below, which are identified and discussed in the impact analysis. These sustainable design features have been included as PPPs where applicable, as they are required pursuant to California Code of Regulations Title 24, Part 11, *California Green Building Standards Code* (also referred to as CALGreen). Where the application of these measures does not reduce an impact to below a level of significance, Project-specific mitigation is introduced. The City of Santa Fe Springs would include these PPPs and mitigation measures in the Mitigation Monitoring and Reporting Program (MMRP) for the Project to ensure their implementation.

Sustainable Design Features

The Project would comply with CALGreen policies related to sustainable design and energy conservation by incorporating the following features into Project development and/or operation:

- Installation of enhanced insulation;
- Design structure to be solar ready;
- Design electrical system to accommodate future renewable energy technologies, solar PV systems, and battery storage systems;
- Installation of energy efficient lighting, heating and ventilation systems, and appliances;
- Installation of drought-tolerant landscaping and water-efficient irrigation systems; and
- Implementation of a City construction waste diversion program.

3.6 DISCRETIONARY APPROVALS AND PERMITS

In accordance with Sections 15050 and 15367 of the State CEQA Guidelines, the City is the designated Lead Agency for the proposed Project and has principal authority and jurisdiction for CEQA actions and Project approval. Responsible Agencies are those agencies that have jurisdiction or authority over one or more aspects associated with the development of a proposed project and/or mitigation. Trustee Agencies are State agencies that have jurisdiction by law over natural resources affected by a proposed project.

The discretionary actions to be considered by the City, as Lead Agency, as part of the proposed Project include:

- Tentative Parcel Map.
- Development Plan Approval.
- Certification of the Environmental Impact Report.
- Approvals and permits necessary to execute the proposed Project, including but not limited to grading permit, building permit, etc.

In addition, the proposed industrial development will require ministerial approvals by other agencies that include, but are not limited to, the following:

- Regional Water Quality Control Board (RWQCB) and City for approval of a Stormwater Pollution Prevention Plan (SWPPP) and a Water Quality Management Plan.
- South Coast Air Quality Management District (SCAQMD) construction permits.

California Geologic Energy Management (CalGEM) permits for well abandonment.

This page intentionally left blank.

-

4. Environmental Setting

The purpose of this section is to provide a description of the environmental setting of the Project site and surrounding area as it existed at the time of the Notice of Preparation (NOP) was published, from both a local and regional perspective. In addition to the summary below, detailed environmental setting descriptions are provided in each subsection of Section 5 of this Draft EIR.

4.1 REGIONAL SETTING

The proposed Project is located within the central portion of the City of Santa Fe Springs, at the northwest corner of Santa Fe Springs Road and Telegraph Road, as shown in Figure 3-1, *Regional Location*. Santa Fe Springs is located approximately 13 miles from Downtown Los Angeles, 39 miles from Downtown Riverside, and 14 miles from Long Beach. Regional access to the Project site is provided by Interstate 5 (I-5), Interstate 605 (I-605), and State Route 72 (SR-72). Local access to the Project site is provided via Telegraph Road and Santa Fe Springs Road. The existing site and surrounding areas are shown in Figure 3-2, *Local Vicinity*.

The Project site comprises one parcel encompassing approximately 26.77 acres and is generally located north of Telegraph Road, west of Santa Fe Springs Road, south of McCann Drive, and east of Norwalk Boulevard. The site is identified by Assessor's Parcel Number 8005-015-051.

4.2 EXISTING LAND USE AND ZONING

The Project site has a General Plan land use designation of Industrial, and a zoning designation of Heavy Manufacturing (M-2). The Industrial land use designation is intended to provide locations for general industrial, manufacturing, outdoor storage, and logistic activities at a maximum floor area ratio (FAR) of 0.75. The M-2 zone district provides sites for heavy industrial uses, oil and gas drilling, select manufacturing operations, salvage operations, automobile and truck services, and similar compatible uses (Santa Fe Springs Municipal Code Section 155.241). Warehouse uses are permitted within the M-2 zone. The Project's site existing land use designation and zoning is shown in Figure 3-5, *Existing General Plan Land Use* and Figure 3-6, *Existing Zoning*.

4.3 SURROUNDING LAND USES AND DEVELOPMENT

The Project site is located within a developed area that primarily consists of industrial uses. There is an existing single family residential area located south of the Project site, across Telegraph Road. The surrounding land uses are described in Table 4-1.

Table 4-1: Surrounding Existing Land Use and Zoning Designations

	Existing Land Use	General Plan Designation	Zoning Designation
North	Industrial development	Industrial	Heavy Manufacturing (M-2)
East	Industrial development	Industrial and Light Industrial	Light Industrial (M-1) and Heavy Manufacturing (M-2)
South	One industrial building, oil and gas extraction, followed by Telegraph Road	Industrial, Light downtown	Light Industrial (M-1), Heavy Manufacturing (M-2) and Mixed-Use-Downtown (MU-DT)

	Existing Land Use	General Plan Designation	Zoning Designation
West	Oil and gas extraction, followed by Santa Fe Springs Road and industrial development:	Industrial	Heavy Manufacturing (M-2)

4.4 PHYSICAL ENVIRONMENTAL CONDITIONS

CEQA Guidelines Section 15125(a)(1) states that the physical environmental condition in the vicinity of the Project as it existed at the time the EIR's NOP was released for public review normally be used as the comparative baseline for the EIR. The NOP for this EIR was released for public review on May 13, 2024. The following pages include a description of the physical environmental conditions ("existing conditions") on a regional and local basis at the approximate time the NOP was released. More information regarding the Project site's environmental setting is provided in the specific subsections of EIR Section 5, *Environmental Analysis*.

4.4.1 Air Quality

The Project area is located within the South Coast Air Basin (Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Basin is a 6,600-square-mile coastal plain bounded by the Pacific Ocean to the southwest and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, and all of Orange County.

Atmospheric conditions such as wind speed, wind direction, and air temperature gradients interact with the physical features of the landscape to determine the movement and dispersal of air pollutants. The topography and climate of southern California combine to make the Basin an area of high air pollution potential. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and San Bernardino mountains around the rest of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The usually mild climatological pattern is disrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cool marine layer and inhibits the pollutants in the marine layer from dispersing upward. In addition, light winds during the summer further limit ventilation. Furthermore, sunlight triggers the photochemical reactions which produce ozone.

4.4.2 Energy

Energy

The Southern California Edison Company (SCE) is the electrical purveyor in the City of Santa Fe Springs. SCE provides electricity service to more than 14 million people in a 50,000-square-mile area of central, coastal, and Southern California. According to the California Energy Commission (CEC), total electricity consumption in the SCE service area in 2021 was 103,045 GWh (36,375 GWh for the residential sector and 51,057 GWh for the non-residential sector). Total electricity consumption in Los Angeles County in 2021 was 65,374.7 GWh (65,374,721,369 kilowatt-hours (kWh)) (California Energy Commission, 2022).

Existing electrical utilities near the Project site exist near the northern property line.

4.4.3 Geology and Soils

Paleontological Resources

The geology mapped within the Project site are Holocene to Pleistocene-aged old alluvial fan deposits described as consolidated gravel, sand, and silt. Holocene alluvium is generally considered to be geologically too young to contain significant fossils. Pleistocene alluvial and alluvial fan deposits within Los Angeles Basin often yield important Ice Age fossils and therefore have a high paleontological sensitivity.

Unique geologic features refer to unique physical features or structures on the earth's crust. The Project site does not contain any unique geologic features. The Project site is currently heavily disturbed from previous and ongoing oil well activities and contains one, single-story 3,310 SF office building on the western edge of the property and a 1,282 SF canopy structure to the northeast of the building that is used to cover construction equipment; the remainder of the site consists of land that is utilized for oil and gas extraction. As described previously, the site is underlain by mid to late Pleistocene alluvial fan deposits.

The geology mapped within the Project site are Holocene to Pleistocene-aged old alluvial fan deposits described as consolidated gravel, sand, and silt. Holocene alluvium is generally considered to be geologically too young to contain significant fossils. Pleistocene alluvial and alluvial fan deposits within Los Angeles Basin often yield important Ice Age fossils and therefore have a high paleontological sensitivity.

4.4.4 Greenhouse Gas Emissions

Gases that trap heat in the atmosphere are called greenhouse gases (GHGs). The major concern with GHGs is that increases in their concentrations are contributing to global climate change. Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature. Although there is disagreement as to the rate of global climate change and the extent of the impacts attributable to human activities, most in the scientific community agree that there is a direct link between increased emissions of GHGs and long-term global temperature increases.

The principal GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different warming potential, and CO₂ is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e). For example, SF₆ is a GHG commonly used in the utility industry as an insulating gas in circuit breakers and other electronic equipment. SF₆, while comprising a small fraction of the total GHGs emitted annually world-wide, is a much more potent GHG, with 22,800 times the global warming potential as CO₂. Therefore, an emission of one metric ton (MT) of SF₆ could be reported as an emission of 22,800 MT of CO₂e. Large emission sources are reported in million metric tons (MMT) of CO₂e.

4.4.5 Hazards and Hazardous Materials

Environmental Site Conditions

The Project site is located within an industrial area. The Phase I ESA prepared for the Project site (Appendix I) included searches of federal, State, and local databases that identified hazardous materials concerns on sites within the vicinity of the Project site. The adjoining properties to the north, northwest, south, and west were identified with the following labels related to their database listings: Hazardous Waste Information System (HAZNET), FINDS/FRS, Cleanup Sites, CERS Haz, Resource Conservation and Recovery Act – Non-Generator (RCRA-NON GEN), Resource Conservation and Recovery Act – Treatment, Storage, and/or Disposal (RCRA-TSD), Emissions, Historical Hazardous Substance Storage Information Database (HHSS),

Historic Tank, and California Hazardous Material Incident Report System (CHMIRS). These listings are related to similar oil, gas, and hazardous materials uses.

The Project site has been utilized for oil production since approximately 1923 and contains over 100 oil wells that consist of active, idle, plugged, and canceled wells. The wells are productive at approximately 4,500 feet below ground surface (bgs) (Appendix J). In addition, the site includes one single-story office building on the western edge of the site and a canopy structure to the northeast of the building that is used to cover construction equipment.

4.4.6 Hydrology and Water Quality

Regional Hydrology

The City of Santa Fe Springs is located within the Los Angeles Region. The Los Angeles RWQCB (Region 4) has jurisdiction over all coastal watersheds and drainages flowing to the Pacific Ocean between Rincon Point (on the coast of western Ventura County) and the eastern Los Angeles County line, as well as the drainages of five coastal islands (Anacapa, San Nicolas, Santa Barbara, Santa Catalina, and San Clemente). The Los Angeles Region encompasses 10 watershed management areas, which generally consist of a single large watershed within which exist smaller sub-watersheds that are tributary to the mainstem river (State Water Resources Control Board, 2020).

Watershed

The Project is located in the Lower San Gabriel River Watershed, which encompasses an approximately 78.5 square miles (50,240 acres) within Los Angeles County and comprises 11.4 percent drainage area for the San Gabriel River Watershed. The San Gabriel River Watershed covers an area of approximately 689 square miles. The main channel of the San Gabriel River is approximately 58 miles long. Its headwaters originate in the San Gabriel Mountains with the East, West, and North Forks. The river empties to the Pacific Ocean at the Los Angeles and Orange Counties boundary in Long Beach. The main tributaries of the San Gabriel River are Big and Little Dalton Wash, San Dimas Wash, Walnut Creek, San Jose Creek, Fullerton Creek, and Coyote Creek (John L Hunter and Associates, 2014).

Groundwater Basin

Santa Fe Springs is located over the Central Basin groundwater basin, which is a subbasin of the Coastal Plain of Los Angeles Groundwater Basin. The Central Basin is bounded to the north by the Hollywood Basin and the Elysian, Repetto, Merced, and Puente Hills; to the east by the Los Angeles County/Orange County line; and to the south and west by the Newport-Inglewood Uplift, a series of discontinuous faults and folds that form a prominent line of northwest-trending hills including the Baldwin Hills, Dominguez Hills, and Signal Hill. The Central Basin covers approximately 280 square miles and is hydrogeologically divided into four subareas – the Los Angeles Forebay, Montebello Forebay, Whittier Area, and Pressure Area.

Water Supply

The City of Santa Fe Springs Water Utility Authority provides water supply to most of the City, covering approximately 90 percent of the land area within the City limits, including the Project site. Historically, the water supply sources have included local groundwater pumped from City wells, treated groundwater through the Water Quality Protection Program, treated imported water purchased from Metropolitan Water District through Central Basin Municipal Water District (CBMWD), and recycled water supplies provided by CBMWD (City of Santa Fe Springs, 2021a).

Groundwater Quality

The Omega Chemical Corporation was a refrigerant and solvent recycling company that operated in the City of Whittier between 1976 and 1991. As a result of business operations, spills and leaks of various chemicals contaminated the soil and groundwater beneath the facility with high concentrations of tetrachloroethene (PCE) and trichloroethene (TCE). The contaminated area has been identified as a Superfund site pursuant to CERCLA. Prolonged exposure to these chemicals has been proven to cause severe long-term health effects.

Existing Drainage

The site is relatively flat and generally drains from northeast to southwest. The Project site contains sparse vegetation consisting primarily of ornamental trees and shrubs. The Project site does not contain any existing wetlands, drainages, or jurisdictional waters.

The City of Santa Fe Springs Department of Public Works maintains and operates the City's stormwater system. The existing site is approximately 98 percent pervious, though graded roads travelled by vehicles and heavy machinery most likely have heavily compacted a small percentage of the total area. An existing 51-inch reinforced concrete pipe storm drain runs parallel to and within a few feet inside the Project's east property line and connects to a 54-inch storm drain below Telegraph Road. This 54-inch storm drain runs west until it connects to a Los Angeles County Flood Control District owned drain that eventually drains into the San Gabriel River.

Flood Zone

The Project site is within "Zone X" of "Other Flood Areas," as determined by the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) (Map Number 06037C1829F). These areas are defined as areas of 0.2 percent annual chance of flood; areas of 1 percent annual chance of flood with average depth of less than one foot or with drainage areas of less than one square mile; and areas protected by levees from 1 percent annual chance of flood (Federal Emergency Management Agency, 2024). Zone X is outside the Special Flood Hazard Areas, which are subject to inundation by the 1 percent chance flood.

4.4.7 Mineral Resources

According to the Santa Fe Springs General Plan and Targeted Zoning Code Updated Environmental Impact Report (EIR) (SCH#2021050193), the city of Santa Fe Springs is primarily designated as MRZ-1 (City of Santa Fe Springs, 2021b). MRZ-1 includes areas where geologic evidence indicates that there are no significant mineral deposits present or likely to exist. The western portion of the City is classified as MRZ-3, meaning that while these areas contain mineral deposits, there is inadequate available data to determine their significance (City of Santa Fe Springs 2021b) or the resources are not economically significant. There are no portions of the City designated MRZ-2 or MRZ-4. As such, there are no areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists within the Planning Area.

4.4.8 Noise

Existing Noise Levels

The background ambient noise levels in the Project area are dominated by the transportation-related noise associated with Telegraph Road and Santa Fe Spring Road. Table 5.8-5, *Summary of 24-Hour Ambient*

Noise Level Measurements, of Section 5.8, *Noise*, provides a summary of the hourly daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at each noise level measurement location. These daytime and nighttime noise levels represent an average of all noise levels observed during these time periods. The existing average noise levels range from 66.9 dBA L_{eq} to 68.5 dBA L_{eq} during daytime hours and from 64.0 dBA L_{eq} to 65.7 dBA L_{eq} during nighttime hours.

Existing Vibration

Aside from periodic construction work that may occur in the vicinity of the Project area, other sources of groundborne vibration include heavy-duty trucks, such as garbage trucks, on area roadways. Trucks traveling at a distance of 50 feet typically generate groundborne vibration velocity levels of around 63 VdB (approximately 0.006 in/sec PPV) and could reach 72 VdB (approximately 0.016 in/sec PPV) when trucks pass over bumps in the road (FTA, 2006).

Existing Airport Noise

The closest airport is the Long Beach Airport (LGB) located roughly 9.7 miles southwest of the Project site. As such, the Project site is not exposed to excessive noise levels from airport operations.

Sensitive Receivers

Noise sensitive receivers are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include residences, schools, hospitals, and recreation areas.

Three locations were identified as representative locations for this analysis, as shown in Figure 5.8-2, *Receiver Locations*, of Section 5.8, *Noise*, and described below:

R1: Location R1 represents the existing noise sensitive residence at 10404 Sycamore Lane, approximately 358 feet south of the Project site.

R2: Location R2 represents the existing noise sensitive residence at 1410 Orchid Way, approximately 437 feet south of the Project site.

R3: Location R3 represents the existing noise sensitive residence at 10404 Satinwood Court, approximately 474 feet south of the Project site.

4.4.9 Transportation

Existing Roadway Network

Interstate 605 (I-605) is a north–south auxiliary interstate highway in the state of California that connects Los Angeles County to Orange County. Regional access to the Project site is provided by I-605, which is located approximately 1.5 miles to the west.

Interstate 5 (I-5) is a north–south interstate highway in the state of California. I-5 stretches from the Mexican border at the San Ysidro crossing to the Canadian border near Blaine, Washington. Regional access to the Project site is provided by I-5, which is located approximately 1.6 miles to the east.

State Route 72 (SR-72) is a California State highway. Regional access to the Project site is provided by SR 72, which is located approximately 2.0 miles to the north.

Telegraph Road is an east-west major arterial road. The posted speed limit is 45 mph. There are no existing or planned bicycle facilities along this roadway. Telegraph Road is identified as key arterial that provides freight (truck) access with no weight restrictions.

Santa Fe Springs Road is a north-south major arterial road. The posted speed limit is 45 mph. There are existing bike lanes on both sides of Santa Fe Spring Road between Telegraph Road and Los Nietos Road. Santa Fe Springs road is identified as key arterial that provides freight (truck) access with no weight restrictions.

Norwalk Boulevard is a north-south major arterial road. The posted speed limit is 40 mph. There are no existing or planned bicycle facilities along this roadway. Norwalk Boulevard has no weight restrictions.

Hawkins Street is an east-west local street. The posted speed limit is 30 mph. There are no existing or planned bicycle facilities along this roadway. Hawkins Street has no weight restrictions.

Existing Truck Routes

In Santa Fe Springs, arterial roadways have been designed to accommodate freight movement (Santa Fe Springs, 2022a). Telegraph Road, Santa Fe Springs Road, and Norwalk Boulevard are major arterial roads. Telegraph Road, Santa Fe Springs Road, Norwalk Boulevard, and Hawkins Street have no weight restrictions, and thus may be utilized by truck traffic.

Existing Site Access

Regional access to the Project site is provided by I-5, I-605, and SR-72. Local access to the Project site is provided via Telegraph Road and Santa Fe Springs Road. The Project site is northwest of the Telegraph Road and Santa Fe Springs Road intersection.

Existing Transit Service

Public transportation services within the City are provided by Metrolink, Foothill transit, Montebello Bus Lines, and Norwalk Transit System (Santa Fe Springs, 2022a). The Norwalk/Santa Fe Springs Metrolink station is located approximately 1.75 miles south of the Project site at 12650 Imperial Highway, Norwalk. The nearest bus stops to the Project site are: Metrolink, located on the corner of Telegraph Road and Norwalk Boulevard, approximately 1,570 linear feet from the Project site; Metrolink, located on the corner of Telegraph Road and Santa Fe Springs Road, approximately 290 linear feet from the Project site; and Norwalk Transit System, also located on the corner of Telegraph Road and Santa Fe Springs Road, approximately 290 feet from the Project site.

Existing Bicycle and Pedestrian Facilities

There are existing Class III bike lanes on both sides of Santa Fe Spring Road between Telegraph Road and Los Nietos Road. The City of Santa Fe Springs General Plan Circulation Element identifies Santa Fe Springs Road, located east of the Project site, as a proposed buffered bike lane (Class IIB). In addition, Los Nietos Road, located approximately 1,995 linear feet north of the Project site, is identified as a proposed buffered bike lane (Class IIB); Clark Street, located approximately 1,285 linear feet south of the Project site (south of the residential area), is identified as a proposed bicycle route (Class III); and Geary Avenue, located approximately 2,255 linear feet west of the Project site, is identified as a proposed bicycle lane (Class II) (City of Santa Fe Springs, 2022a).

There are existing sidewalks on both sides of Telegraph Road between Bloomfield Avenue and Norwalk Boulevard. There are existing sidewalks on both sides of Santa Fe Springs Road between Telegraph Road and Los Nietos Road.

Existing Vehicle Miles Traveled

Vehicle miles traveled (VMT) is defined as one vehicle traveling on a road for one mile. The Project site is located within a SCAG Tier 1 Traffic Analysis Zone (TAZ) (TAZ 21832000). The TAZ is identified as being “Higher than City Baseline” for home-based work (HBW) trip VMT per employee per the *City of Santa Fe Springs Transportation Study Guidelines* (Santa Fe Springs, 2023).

4.4.10 Tribal Cultural Resources

The Antelope Valley area has supported a long prehistoric Native American population. Evidence of villages, camps, burials, quarries, rock features, and bedrock mortars has been documented at archaeological sites across the desert.

The Project is within an area considered the Traditional Tribal Land of the Kitanemuk people. As part of the Cultural Resources Assessment (Appendix D) for the Project site, research was conducted using several resources to identify potential TCRs within the Project area. The assessments included a records search at the South Central Coastal Information Center (SCCIC), background and literature research, a search of the Sacred Lands File (SLF) by the NAHC, outreach efforts with Native American tribal representatives, an examination of geological maps, and an intensive pedestrian survey of the Project site. No TCRs were identified as part of the records search and site survey of the Project site. The site is not listed in the NAHC SLF.

4.4.11 Utilities and Service Systems

Water Supply and Demand

The City of Santa Fe Springs has four sources of water supply: treated groundwater through the Central Basin Water Quality (CBWQPP) Protection Program; treated imported water purchased from the Metropolitan Water District (MWD) through (CBMWD); imported treated water purchased from the CBWQPP; and recycled water from CBMWD. In 2020 the SFSWUA obtained the majority of its water supply from purchased or imported water from the Central Basin MWD and from purchased or imported water from the CBWQPP. Water from the Central Basin MWD is primarily from treated groundwater.

Wastewater

The wastewater generated within the City is collected by the City’s local sewer system and the Los Angeles County Sanitation District (LACSD’s) trunk sewer system, and treated by the Los Coyotes Water Reclamation Plant (LCWRP) and the Long Beach Water Reclamation Plant (LBWRP) (City of Santa Fe Springs, UWMP, 2021). Currently, LCWRP has a design capacity of 37.5 million gallons/day (MGD) and an average flow of 21.7 MGD. LBWRP currently has a design capacity of 25 MGD and an average flow of 12.6 MGD. The two reclamation plants have a combined design capacity of 62.5 MGD which is equivalent to approximately 70,055 AFY (UWMP, 2020). The Project site would fall within the LCWRP’s service area.

Site Drainage

The Project site is relatively flat with an elevation of 131 feet above mean sea-level to 164 feet above mean sea-level with no areas of significant topographic relief. The site generally drains from northeast to

southwest. Runoff from the Project site currently drains into an existing 51-inch reinforced concrete pipe storm drain that runs parallel to and in some portions a few feet inside the Project's east property line and connects to a 54-inch storm drain below Telegraph Road. This 54-inch storm drain runs west until it connects to a Los Angeles County Flood Control District drain, and eventually drains into the San Gabriel River.

Solid Waste

The City of Santa Fe Springs is currently contracted with Republic Services and Serv-well Disposal Solid for waste collection, disposal, and recycling services for non-residential uses. Solid waste generated by the City is disposed of at the Savage Canyon Landfill, located approximately 3.5 miles northwest of the proposed Project site. The Savage Canyon Landfill has a daily permitted throughput of 3,350 tons per day of solid waste and is permitted to operate through December 2079. In 2023, the landfill received a total of 86,576.96 tons which results in an average of 237 tons per day.

In addition, the most recent data on the Calrecycle Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility database identifies that in 2019, 34 percent of the solid waste from the City was disposed of at the Frank Bowerman Landfill, 23 percent at the Sunshine Canyon Landfill, and 12 percent at the Savage Canyon Landfill, which is the closest landfill to the Project Site. Thus, although the General Plan EIR identifies the Savage Canyon Landfill as the primary landfill, it is likely that solid waste produced by the City would also be disposed of at the Frank Bowerman Landfill and at the Sunshine Canyon Landfill.

The Adelanto Soil Safe of California Facility, which allows for the disposal of contaminated soil, has a maximum capacity of 5,000 tons per day. In May of 2024 the facility had a maximum incoming volume of 1,735.22 tons of waste per day. Thus, the facility had a remaining capacity of 3,264.78 tons per day.

4.5 REFERENCES

Brian F. Smith and Associates, Inc. (2024, May 14). *Cultural Resources Study*,. **(Appendix D)**

City of Santa Fe Springs. (2021 a). *Santa Fe Springs 2040 General Plan*. Retrieved from City of Santa Fe Springs: <https://www.reimaginesantafesprings.org/documents#GP>

City of Santa Fe Springs. (2021 b). *Santa Fe Springs General Plan and Targeted Zoning Code Update Environmental Impact Report*. Retrieved from Re-Imagine Santa Fe Springs 2040 General Plan: <https://www.reimaginesantafesprings.org/documents#GP>

Federal Transit Administration. (2006, May). *Transit Noise and Vibration Impact Assessment*. Retrieved January 23, 2024, from https://docs.vcrma.org/images/pdf/planning/ceqa/FTA_Noise_and_Vibration_Manual.pdf

John L Hunter and Associates. (2014, June). *Lower San Gabriel River Watershed Management Program*. https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/san_gabriel/lower_sangabriel/LowerSGR_WMP1.pdf

Partner Engineering and Science, Inc. (2022). *Phase I Environmental Site Assessment*. **(Appendix I)**

Partner Engineering and Science, Inc. (2023). *Phase II Site Investigation Report*. **(Appendix J)**

State Water Resources Control Board. (2020, May). *Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*. https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.html

This page intentionally left blank.

5. Environmental Impact Analysis

This chapter examines the environmental setting of the Project, analyzes its effects and the significance of its impacts, and recommends mitigation measures to reduce or avoid impacts. This chapter is divided into subsections for each environmental issue area that was determined to need further study in the Draft EIR through the Notice of Preparation (NOP) review and comment process (see Appendix A). Environmental topic areas discussed in this Draft EIR include the following:

5.1 Aesthetics	5.7 Mineral Resources
5.2 Energy	5.8 Noise
5.3 Geology and Soils	5.9 Transportation
5.4 Greenhouse Gas Emissions	5.10 Tribal Cultural Resources
5.5 Hazards and Hazardous Materials	5.11 Utilities
5.6 Hydrology and Water Quality	

This Draft EIR evaluates the direct and indirect impacts resulting from the planning, construction, and operations of the Project. Under CEQA, EIRs are intended to focus their discussion on significant impacts and may limit discussion of other impacts to a brief explanation of why the impacts are not significant.

FORMAT OF ENVIRONMENTAL TOPIC SECTIONS

Each environmental topic section generally includes the following main subsections:

- **Introduction.** This subsection describes the purpose of analysis for the environmental topic and referenced documents used to complete the analysis. This subsection may define terms used.
- **Regulatory Setting.** This subsection describes applicable federal, state, and local plans, policies, and regulations that the Project must address and may affect its implementation.
- **Environmental Setting.** This subsection describes the existing physical environmental conditions (environmental baseline) related to the environmental topic being analyzed.
- **Thresholds of Significance.** This subsection sets forth the thresholds of significance (significance criteria) used to determine whether impacts are “significant.” The thresholds of significance used to assess the significance of impacts are based on those provided in Appendix G of the CEQA Guidelines.
- **Methodology.** This subsection provides a description of the methods used to analyze the impact and determine whether it would be significant or less than significant.
- **Environmental Impacts.** This subsection provides an analysis of the impact statements for each identified significance threshold. The analysis of each impact statement is organized as follows:
 - A statement of the CEQA threshold being analyzed,
 - The Draft EIR’s conclusion as to the significance of the impact.
 - An impact assessment that evaluates the changes to the physical environment that would result from the Project.
 - An identification of significance comparing identified impacts of the Project to the significance threshold with implementation of existing regulations, prior to implementation of any required mitigation.
- **Cumulative Impacts.** This subsection describes the potential cumulative impacts that would occur from the Project’s environmental effects in combination with other cumulative projects (See Table 5-1).
- **Existing Regulations and Regulatory Requirements.** A list of applicable laws and regulations that would reduce potentially significant impacts.

- **Level of Significance Before Mitigation.** A determination of the significance of the impacts after the application of applicable existing regulations and regulatory requirements, and prior to any mitigation.
- **Mitigation Measures.** For each impact determined to be potentially significant after the application of applicable laws and regulations, feasible mitigation measure(s) to be implemented are provided. Mitigation measures include enforceable actions to:
 - Avoid a significant impact;
 - Minimize the severity of a significant impact;
 - Rectify an impact by repairing, rehabilitating, or restoring the effected physical environment;
 - Reduce or eliminate the impact over time through preservation and/or maintenance operations during the life of the Project; and/or
 - Compensating for the impact by replacing or providing substitute resources or environmental conditions.
- **Level of Significance After Mitigation.** This section provides the determination of the impact's level of significance after the application of regulations, regulatory requirements, and mitigation measures.

CUMULATIVE IMPACTS

Cumulative impacts refer to the combined effect of the proposed Project's impacts with the impacts of other past, present, and reasonably foreseeable probable future projects. Both CEQA and the CEQA Guidelines require that cumulative impacts be analyzed in an EIR. As set forth in the CEQA Guidelines Section 15130(b), "the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone." The CEQA Guidelines direct that the discussion should be guided by practicality and reasonableness and focus on the cumulative impacts that would result from the combination of the proposed project and other projects, rather than the attributes of other projects which do not contribute to cumulative impacts.

According to Section 15355 of the CEQA Guidelines, 'cumulative impacts' refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts:

- a) The individual effects may be changes resulting from a single project or a number of separate projects.
- b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Therefore, the cumulative discussion in this Draft EIR focuses on whether the impacts of the proposed Project are cumulatively considerable within the context of impacts caused by other past, present, and reasonably foreseeable future projects. Additionally, pursuant to the CEQA Guidelines Section 15130(a)(1), an EIR should not discuss cumulative impacts that do not result at least in part from the project being evaluated in the EIR. Thus, a cumulative impact analysis is not provided for any environmental issue where the proposed Project would have no environmental impact. Analysis of cumulative impacts is, however, provided for all Project impacts that are evaluated within this Draft EIR.

CEQA Guidelines Section 15130(b)(1) states that the information utilized in an analysis of cumulative impacts should come from one of the following, or a reasonable combination of the two:

- A list of past, present, and probable future projects producing related or cumulative impacts, including those projects outside the control of the lead agency; or

- A summary of projections contained in an adopted local, regional, or statewide plan or related planning document that describes or evaluates conditions contributing to the cumulative effect.

The cumulative analysis for air quality, greenhouse gas emissions, and transportation relies on projections contained in adopted local, regional, or statewide plans or related planning documents, such as the Southern California Association of Governments (SCAG) Southern California Regional Transportation Plan/Sustainable Communities Strategy. The cumulative analyses for other environmental issues use the list of projects approach.

Different types of cumulative impacts occur over different geographic areas. For example, the geographic scope of the cumulative air quality analysis, where cumulative impacts occur over a large area, is different from the geographic scope considered for cumulative analysis of aesthetic resources, for which cumulative impacts are limited to project area viewsheds. Thus, in assessing aesthetic resources impacts, only development within and immediately adjacent to the Project area would contribute to a cumulative visual effect is analyzed, whereas cumulative transportation impacts are based upon annual growth projections and the other proposed and/or foreseeable development within the traffic study area of roadways and intersections. Because the geographic scope and other parameters of each cumulative analysis discussion can vary, the cumulative geographic scope, and the cumulative projects included in the geographic scope (when the list of projects approach is used), are described for each environmental topic. Table 5-1 provides a list of projects considered in this cumulative environmental analysis, which was compiled per information provided by the lead agency on currently pending or future planned projects, and Figure 5-1 shows the locations.

Table 5-1: Cumulative Projects List

No.	Project	Address	Land Use/ Project Type	Size
1	Primestor (Phase 1)	8023 Broadway Ave, Whittier, California, 90606	Residential	44-unit single-room occupancy residential development
2	EC & Associates	11790 Slauson Ave, Santa Fe Springs, CA, 90670, USA	Industrial	12,731 SF multi- tenant industrial building
3	Rexford Industrial	9615 Norwalk Blvd, Santa Fe Springs, CA, 90670, USA	Industrial	201,467 SF concrete tilt-up industrial building
4	CPL Los Nietos	12521 Los Nietos Rd, Santa Fe Springs, CA, 90670, USA	Industrial	92,771 SF concrete tilt-up industrial building
5	NLC Office, LLC	9803 Santa Fe Springs Rd, Santa Fe Springs, CA, 90670, USA	Commercial	2,675 SF single-story office building
6	OU2 Water Treatment Plant	10051 Santa Fe Springs Rd, Santa Fe Springs, CA, 90670, USA	Industrial	48,649 SF water- pumping and treatment plant on the subject property
7	Center Point (WDI Site)	9951 Greenleaf Ave, Santa Fe Springs, California, 90670	Industrial	216,500 SF industrial building
8	Rexford Industrial	9920 Pioneer Blvd, Santa Fe Springs, CA, 90670, USA	Industrial	103,950 SF concrete tilt-up industrial

No.	Project	Address	Land Use/ Project Type	Size
				building (3 warehouses)
9	Chick-Fil-A	13225 Telegraph Rd, Santa Fe Springs, CA, 90670, USA	Commercial	4,723 SF drive-thru restaurant
10	Golden State Storage	13020 Telegraph Rd, Santa Fe Springs, CA, 90670, USA	Industrial	97,503 SF mini-warehouse building with an existing 2,404 SF caretaker facility
11	Sonics	10712 Laurel Ave, Santa Fe Springs, California, 90670	Commercial	2,370 SF drive-thru and drive-in restaurant
12	The Whole Child	13231 Lakeland Rd, Santa Fe Springs, CA, 90670, USA	Residential	19-unit transitional/supportive housing
13	Duke Realty Lakeland Rd LP	12300 Lakeland Rd, Santa Fe Springs, CA, 90670, USA	Industrial	185,450 SF concrete tilt-up industrial building
14	Secure Space Self Storage	11212 Norwalk Blvd, Santa Fe Springs, CA, 90670, USA	Industrial	128,869 SF mini warehouse facility along with a new 1,200 SF office building
15	Greenstone SFS, LLC	11401 Greenstone Ave, Santa Fe Springs, CA, 90670, USA	Industrial	144,434 SF concrete tilt-up industrial building
16	Rexford Industrial	12118 Bloomfield Ave, Santa Fe Springs, CA, 90670, USA	Industrial	109,570 SF concrete tilt-up industrial building
17	Bridge (Univar)	13900 Carmenita Rd, Santa Fe Springs, CA, 90670, USA	Industrial	150,548 SF concrete tilt-up industrial building
18	Aspire Townhomes	11733 Florence Ave, Santa Fe Springs, CA, 90670, USA	Residential	54-unit condominiums
19	Brenntag Pacific, Inc.	10747 Patterson Pl, Santa Fe Springs, CA, 90670, USA	Industrial	Replacing one (1) outdoor storage tank at 8 ft. in diameter and 18 ft. in height and three (3) outdoor storage tanks at 8 ft. in diameter and 12 ft. in height with four (4) new outdoor storage tanks at 14 ft. in diameter and 30 ft. in height.
20	Tall Properties LLC	10003 Freeman Ave, Santa Fe Springs, CA, 90670, USA	Industrial	4,980 SF metal industrial building

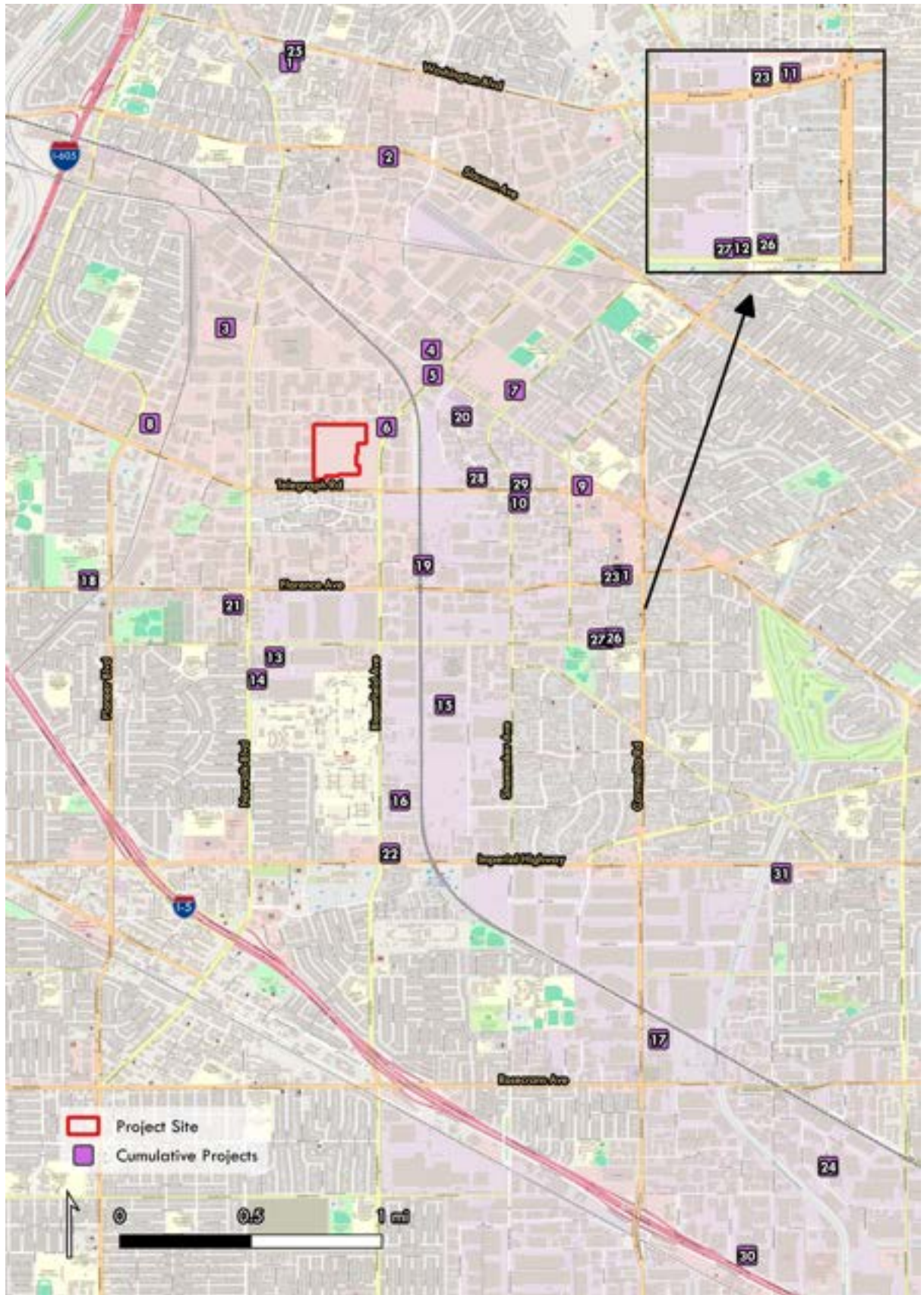
No.	Project	Address	Land Use/ Project Type	Size
21	Florence Business Park	10845 Norwalk Blvd, Santa Fe Springs, California, 90670	Industrial	70,000 SF & 75,000 SF (2 industrial buildings)
22	Raising Cane's	12623 Imperial Hwy, Santa Fe Springs, CA, 90670, USA	Commercial	2,899 SF drive- through restaurant
23	Coast to Coast Commercial, LLC	10712 Laurel Ave, Santa Fe Springs, California, 90670	Commercial	5,452 SF multi-tenant commercial building with a drive-thru component
24	Best California Gas, Ltd.	14800 Radburn Ave, Santa Fe Springs, CA, 90670, USA	Industrial	6,158 SF Truck and trailer storage parking lot
25	Primestor (Phase 2)	11330 Washington Blvd, Whittier, CA, 90606, USA	Residential	88 affordable housing units and 8,900 SF of ground- floor retail.
26	Habitat For Humanity	13311 Lakeland Rd, Whittier, CA, 90605, USA	Residential	18-unit housing development
27	The Richman Group	13231 Lakeland Rd, Santa Fe Springs, CA, 90670, USA	Residential	50-unit senior apartment housing complex within a 102- unit affordable housing development
28	NEC Freeman Ave & Telegraph Rd	10320 Freeman Ave, Santa Fe Springs, CA, 90670, USA	Industrial	19,124 SF concrete tilt-up industrial building
29	Greenleaf XC, LLC	13007 Telegraph Rd, Santa Fe Springs, CA, 90670, USA	Industrial	57,489 SF concrete tilt-up industrial building
30	Rexford Industrial - 13711 Freeway, LLC	13711 Freeway Dr, Santa Fe Springs, CA, 90670, USA	Industrial	104,900 SF concrete tilt-up industrial building
31	Public Storage	13808 Imperial Hwy, Santa Fe Springs, CA, 90670, USA	Industrial	203,532 SF self- storage facility

Notes: SF= Square Feet

Source: City of Santa Fe Springs, 2024

This page intentionally left blank.

Cumulative Projects



This page intentionally left blank.

IMPACT SIGNIFICANCE CLASSIFICATIONS

The below classifications are used throughout the impact analysis in this Draft EIR to describe the level of significance of environmental impacts. Although the criteria for determining significance are different for each topic area, the environmental analysis applies a uniform classification of the impacts based on definitions consistent with CEQA and the CEQA Guidelines.

- **No Impact.** The Project would not change the environment.
- **Less Than Significant.** The Project would not cause any substantial, adverse change in the environment.
- **Less Than Significant with Mitigation Incorporated.** The Draft EIR includes mitigation measures that avoid substantial adverse impacts on the environment.
- **Significant and Unavoidable.** The Project would cause a substantial adverse effect on the environment, and no feasible mitigation measures are available to reduce the impact to a less than significant level.

This page intentionally left blank.

5.1 Air Quality

5.1.1 INTRODUCTION

This section provides an overview of the existing air quality within the Project site and surrounding region, a summary of applicable regulations, and analysis of potential short-term and long-term air quality impacts from implementation of the proposed Project. Mitigation measures are recommended as necessary to reduce significant air quality impacts. This analysis is based on the following documents:

- *Santa Fe Springs General Plan 2040*, adopted in 2022
- *Santa Fe Springs General Plan and Targeted Zoning Code Update Environmental Impact Report*, 2021
- *Northwest Corner Telegraph Road and Santa Fe Springs Road Air Quality, Energy, and GHG Impact Analysis*, prepared by EPD Solutions, Inc., 2024 (Appendix B)
- *Northwest Corner Telegraph Road and Santa Fe Springs Road Health Risk Assessment*, prepared by EPD Solutions, Inc., 2024 (Appendix C)

5.1.2 REGULATORY SETTING

5.1.2.1 Federal Regulations

United States Environmental Protection Agency

Criteria Air Pollutants

At the federal level, the United States Environmental Protection Agency (USEPA) has been charged with implementing national air quality programs. The USEPA's air quality mandates are drawn primarily from the federal Clean Air Act (CAA), which was enacted in 1970. The most recent major amendments to the CAA were made by Congress in 1990.

The CAA requires the USEPA to establish National Ambient Air Quality Standards (NAAQS). The USEPA has established primary and secondary NAAQS for the following criteria air pollutants: ozone, Carbon Monoxide (CO), Nitrogen Dioxide (NO₂), Sulfur Dioxide (SO₂), particles with a diameter of 10 micrometers or less (PM₁₀), particles with a diameter of 2.5 micrometers or less (PM_{2.5}), and lead. These pollutants are referred to as "criteria air pollutants" because they are the most prevalent air pollutants known to be injurious to human health. Extensive health-effects criteria documents regarding the effects of these pollutants on human health and welfare have been prepared over the years. Standards have been established for each criteria pollutant to meet specific public health and welfare criteria set forth in the federal CAA. Table 5.1-1, *Ambient Air Quality Standards for Criteria Pollutants*, shows the NAAQS for these pollutants (descriptions of each pollutant are also included in Section 5.1.3.2, *Criteria Air Pollutants*).

The CAA also requires each state to prepare an air quality control plan, referred to as a State Implementation Plan (SIP). The CAA Amendments of 1990 (CAAA) added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is modified periodically to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins, as reported by their jurisdictional agencies. The USEPA is responsible for reviewing all SIPs to determine whether they conform to the mandates of the CAA and its amendments, and to determine whether implementing the SIPs will achieve air quality goals. If the USEPA determines a SIP to be inadequate, a federal implementation plan that imposes additional control measures may be prepared for the nonattainment area.

The USEPA also has regulatory and enforcement jurisdiction over emission sources beyond state waters (outer continental shelf), and those that are under the exclusive authority of the federal government, such as aircraft, locomotives, and interstate trucking. The USEPA's primary role at the state level is to oversee state air quality programs. The USEPA sets federal vehicle and stationary source emissions standards and provides research and guidance in air pollution programs.

Hazardous Air Pollutants

The USEPA has programs for identifying and regulating hazardous air pollutants (HAPs). Title III of the CAAA directed the USEPA to promulgate national emissions standards for HAPs (NESHAPs). The NESHAPs may differ for major sources than for area sources of HAPs. Major sources are defined as stationary sources with potential to emit more than 10 tons per year (tpy) of any HAP or more than 25 tpy of any combination of HAPs; all other sources are considered area sources. The emissions standards are to be promulgated in two phases. In the first phase (1992–2000), the USEPA developed technology-based emission standards designed to produce the maximum emission reduction achievable. These standards are generally referred to as requiring maximum achievable control technology (MACT). For area sources, the standards may be different, based on generally available control technology. In the second phase (2001–2008), the USEPA promulgated health-risk-based emissions standards that were deemed necessary to address risks remaining after implementation of the technology-based NESHAPs.

Table 5.1-1: Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	State Standard	National Standard	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Ozone	1 hour	0.09 ppm	---	High concentrations can directly affect lungs, causing irritation. Long-term exposure may cause damage to lung tissue.	Formed when reactive organic gases (ROG) and NO _x react in the presence of sunlight. Major sources include on-road motor vehicles, solvent evaporation, and commercial/industrial mobile equipment.
	8 hours	0.07 ppm	0.075 ppm		
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Classified as a chemical asphyxiant, carbon monoxide interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm		
Nitrogen Dioxide (NO_x)	1 hour	0.18 ppm	0.100 ppm	Irritating to eyes and respiratory tract. Colors atmosphere reddish-brown.	Motor vehicles, petroleum refining operations, industrial sources, aircraft, ships, and railroads.
	Annual Arithmetic Mean	0.030 ppm	0.053 ppm		
Sulfur Dioxide (SO₂)	1 hour	0.25 ppm	75 ppb	Irritates upper respiratory tract; injurious to lung tissue. Can yellow the leaves of plants, destructive to marble, iron, and steel. Limits visibility and reduces sunlight.	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	3 hours	---	0.50 ppm		
	24 hours	0.04 ppm	0.14 ppm		
	Annual Arithmetic Mean	---	0.03 ppm		
Respirable Particulate Matter (PM₁₀)	24 hours	50 µg/m ³	150 µg/m ³	May irritate eyes and respiratory tract, decreases in lung capacity, cancer and increased mortality. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	Annual Arithmetic Mean	20 µg/m ³	---		
	24 hours	---	35 µg/m ³		

Pollutant	Averaging Time	State Standard	National Standard	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Fine Particulate Matter (PM_{2.5})	Annual Arithmetic Mean	12 µg/m ³	12 µg/m ³	Increases respiratory disease, lung damage, cancer, and premature death. Reduces visibility and results in surface soiling.	Fuel combustion in motor vehicles, equipment, and industrial sources; residential and agricultural burning; Also, formed from photochemical reactions of other pollutants, including NO _x , sulfur oxides, and organics.
Lead (Pb)	30 Day Average	1.5 µg/m ³	---	Disturbs gastrointestinal system, and causes anemia, kidney disease, and neuromuscular and neurological dysfunction (in severe cases).	Present source: lead smelters, battery manufacturing and recycling facilities. Past source: combustion of leaded gasoline.
	Calendar Quarter	---	1.5 µg/m ³		
	Rolling 3-Month Average	---	0.15 µg/m ³		
Hydrogen Sulfide	1 hour	0.03 ppm	...	Nuisance odor (rotten egg smell), headache and breathing difficulties (higher concentrations)	Geothermal power plants, petroleum production and refining
Sulfates (SO₄)	24 hour	25 µg/m ³	...	Decrease in ventilatory functions; aggravation of asthmatic symptoms; aggravation of cardio-pulmonary disease; vegetation damage; degradation of visibility; property damage.	Industrial processes.
Visibility Reducing Particles	8 hour	Extinction of 0.23/km; visibility of 10 miles or more	...	Reduces visibility, reduced airport safety, lower real estate value, and discourages tourism.	See PM _{2.5} .

ppm = parts per million; ppb = parts per billion; µg/m³ = micrograms per cubic meter.

The CAAA also required the USEPA to promulgate vehicle or fuel standards containing reasonable requirements that control toxic emissions of, at a minimum, benzene and formaldehyde. Performance criteria were established to limit mobile-source emissions of toxics, including benzene, formaldehyde, and 1,3-butadiene. In addition, Section 219 required the use of reformulated gasoline in selected areas with the most severe ozone nonattainment conditions to further reduce mobile-source emissions.

5.1.2.2 State Regulations

California Air Resources Board

California Clean Air Act (CCAA) and Criteria Air Pollutants

The California Air Resources Board (CARB), a department of the California Environmental Protection Agency, oversees air quality planning and control throughout California. CARB is responsible for coordination and oversight of State and local air pollution control programs in California and for implementation of the California Clean Air Act (CCAA). The CCAA, which was adopted in 1988, requires CARB to establish the California Ambient Air Quality Standards (CAAQS). California has generally adopted more stringent ambient air quality standards for the criteria air pollutants and has adopted air quality standards for some pollutants for which there is no corresponding national standard, such as sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. Applicable CAAQS are included in Table 5.1-1

The CCAA requires all local air districts in the State to endeavor to achieve and maintain the CAAQS by the earliest practical date. The act specifies that local air districts shall focus particular attention on reducing the emissions from transportation and area-wide emission sources and provides districts with the authority to regulate indirect sources.

Among CARB's other responsibilities are overseeing compliance by local air districts with California and federal laws, approving local air quality plans, submitting SIPs to the USEPA, monitoring air quality, determining and updating area designations and maps, and setting emissions standards for new mobile sources, consumer products, small utility engines, off-road vehicles, and fuels.

Diesel Regulations

The CARB and the Ports of Los Angeles and Long Beach have adopted several iterations of regulations for diesel trucks that are aimed at reducing diesel particulate matter (DPM). More specifically, the CARB Drayage Truck Regulation, the CARB statewide On-Road Truck and Bus Regulation, and the Ports of Los Angeles and Long Beach "Clean Truck Program" (CTP) require accelerated implementation of "clean trucks" into the statewide truck fleet. In other words, older more polluting trucks will be replaced with newer, cleaner trucks as a function of these regulatory requirements.

Moreover, the average statewide DPM emissions for heavy duty trucks (HDT), in terms of grams of DPM generated per mile traveled, will dramatically be reduced due to these regulatory requirements. Diesel emissions identified in this analysis therefore overstate future DPM emissions because not all these regulatory requirements are reflected in the modeling.

Toxic Air Contaminants

State air quality regulations also focus on toxic air contaminants (TACs). In general, for those TACs that may cause cancer, there is no concentration that does not present some risk. In other words, there is no safe level of exposure. This contrasts with the criteria air pollutants, for which acceptable levels of exposure can be determined and for which the ambient standards have been established. Instead, the USEPA and CARB regulate HAPs and TACs, respectively, through statutes and regulations that generally require the use of the Maximum Achievable Control Technology (MACT) or best available control technology (BACT) for toxics and to limit emissions. These statutes and regulations, in conjunction with additional rules set forth by the districts, establish the regulatory framework for TACs.

TACs in California are regulated primarily through the Tanner Air Toxics Act (Assembly Bill [AB] 1807 [Chapter 1047, Statutes of 1983]) (Health and Safety Code Section 39650 et seq.) and the Air Toxics Hot Spots Information and Assessment Act (Hot Spots Act) (AB 2588 [Chapter 1252, Statutes of 1987]) (Health and Safety Code Section 44300 et seq.). AB 1807 sets forth a formal procedure for CARB to designate substances as TACs. This includes research, public participation, and scientific peer review before CARB can designate a substance as a TAC. To date, CARB has identified more than 21 TACs and adopted the USEPA's list of HAPs as TACs. Most recently, diesel PM was added to the CARB list of TACs. Once a TAC is identified, CARB then adopts an airborne toxics control measure (ATCM) for sources that emit that particular TAC. If there is a safe threshold for a substance at which there is no toxic effect, the control measure must reduce exposure below that threshold. If there is no safe threshold, the measure must incorporate BACT to minimize emissions.

The Air Toxics Hot Spots Information and Assessment Act requires existing facilities emitting toxic substances above a specified level to prepare a toxic-emission inventory, prepare a risk assessment if emissions are significant, notify the public of significant risk levels, and prepare and implement risk reduction measures.

CARB published the Air Quality and Land Use Handbook: A Community Health Perspective (Handbook), which provides guidance concerning land use compatibility with TAC sources. Although it is not a law or adopted policy, the Handbook offers advisory recommendations for the siting of sensitive receptors near uses associated with TACs, such as freeways and high-traffic roads, commercial distribution centers, rail yards, ports, refineries, dry cleaners, gasoline stations, and industrial facilities, to help keep children and other sensitive populations out of harm's way. Based on CARB's Community Health Air Pollution Information System (CHAPIS), no major TAC sources are located in proximity to the Project area. In addition, CARB has promulgated the following specific rules to limit TAC emissions:

- **CARB Rule 2485** (13 CCR, Chapter 10 Section 2485), Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling
- **CARB Rule 2480** (13 CCR Chapter 10 Section 2480), Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools
- **CARB Rule 2477** (13 CCR Section 2477 and Article 8), Airborne Toxic Control Measure for In-Use Diesel Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate

California Assembly Bill (AB) 1493 – Pavley

In 2002, the California Legislature adopted AB 1493 requiring the adoption of regulations to develop fuel economy standards for the transportation sector. In September 2004, pursuant to AB 1493, the CARB approved regulations to reduce fuel use and emissions from new motor vehicles beginning with the 2009 model year (Pavley Regulations). CARB, USEPA, and the US Department of Transportation's National Highway Traffic and Safety Administration (NHTSA) have coordinated efforts to develop fuel economy standards for model 2017-2025 vehicles, which are incorporated into the "Low Emission Vehicle" (LEV) Regulations.

California Code of Regulations (CCR) Title 13, Motor Vehicles, Section 2449(d)(3)

No vehicle or engines subject to this regulation may idle for more than 5 consecutive minutes. The idling limit does not apply to:

- Idling when queuing;
- Idling to verify that the vehicle is in safe operating condition;
- Idling for testing, servicing, repairing or diagnostic purposes;
- Idling necessary to accomplish work for which the vehicle was designed (such as operating a crane);
- Idling required to bring the machine system to operating temperature; and
- Idling necessary to ensure safe operation of the vehicle.

Title 24 Energy Efficiency Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24 Part 6: The California Energy Code (CALGreen) was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. CALGreen is updated on a regular basis, with the most recently approved update consisting of the 2022 California Green Building Code Standards that became effective January 1, 2023.

The 2022 CALGreen standards that reduce air quality emissions and are applicable to the proposed Project include, but are not limited to, the following:

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance,

readily visible to passers-by, for 5 percent of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).

- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5 percent of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- Designated parking for clean air vehicles. In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).
- EV charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106. 5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty electric vehicle supply equipment for warehouses, grocery stores, and retail stores.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8).
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1, 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
 - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
 - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
 - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combined flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
 - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- Outdoor potable water uses in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWEO), whichever is more stringent (5.304.1).

- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 square feet (SF) or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).
- Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 SF. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 SF requiring a building or landscape permit (5.304.3).
- Commissioning. For new buildings 10,000 SF and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

The 2022 CALGreen Building Standards Code has been adopted by the City of Santa Fe Springs Code of Ordinances in Chapter 150: Building Regulations.

5.1.2.3 Regional Regulations

South Coast Air Quality Management District

Criteria Air Pollutants

The South Coast Air Quality Management District (SCAQMD) attains and maintains air quality conditions in the Basin through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. The clean air strategy of SCAQMD includes preparation of plans for attainment of ambient air quality standards, adoption and enforcement of rules and regulations concerning sources of air pollution, and issuance of permits for stationary sources of air pollution. The SCAQMD also inspects stationary sources of air pollution and responds to citizen complaints; monitors ambient air quality and meteorological conditions; and implements programs and regulations required by the CAA, CAAA, and CCAA. Air quality plans applicable to the proposed Project are discussed below.

Air Quality Management Plan

SCAQMD and the Southern California Association of Governments (SCAG) are responsible for preparing the air quality management plan (AQMP), which addresses federal and State CAA requirements. The AQMP details goals, policies, and programs for improving air quality in the Basin.

The 2012 AQMP was adopted by the SCAQMD Governing Board on December 12, 2012. The purpose of the 2012 AQMP for the Basin is to set forth a comprehensive and integrated program that will lead the region into compliance with the federal 24-hour PM_{2.5} air quality standard, and to provide an update to the Basin's commitment towards meeting the federal 8-hour ozone standards. The AQMP would also serve to satisfy recent USEPA requirements for a new attainment demonstration of the revoked 1-hour ozone standard, as well as a vehicle miles travelled (VMT) emissions offset demonstration. The 2012 AQMP, as approved by CARB, serves as the official SIP submittal for the federal 2006 24-hour PM_{2.5} standard. In addition, the AQMP updates specific new control measures and commitments for emissions reductions to implement the attainment strategy for the 8-hour ozone SIP. The 2012 AQMP set forth programs which require integrated planning efforts and the cooperation of all levels of government: local, regional, State, and federal.

In March 2017, AQMD finalized the 2016 AQMP, which continued to evaluate integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, State, and local

levels. Similar to the 2012 AQMP, the 2016 AQMP incorporated scientific and technological information and planning assumptions, including the 2016 RTP/SCS and updated emission inventory methodologies for various source categories.

The 2022 AQMP was adopted by the SCAQMD Governing Board on December 2, 2022. The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NO_x technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 federal 8-hour ozone standard. SCAQMD proposes a total of 49 control measures for the 2022 AQMP, including control measures focused on widespread deployment of zero emission and low NO_x technologies through a combination of regulatory approaches and incentives.

The RTP/SCS also provides a combination of transportation and land use strategies that help the region achieve State GHG emissions reduction goals and federal CAA requirements, preserve open space areas, improve public health and roadway safety, support our vital goods movement industry, and use resources more efficiently. GHG emissions resulting from development-related mobile sources are the most potent source of emissions.

SCAQMD Rules and Regulations

All projects are subject to SCAQMD rules and regulations. Specific rules applicable to the proposed Project include the following:

Rule 203 – Permit to Operate. A person shall not operate or use any equipment or agricultural permit unit, the use of which may cause the issuance of air contaminants, or the use of which may reduce or control the issuance of air contaminants, without first obtaining a written permit to operate from the Executive Officer or except as provided in Rule 202. The equipment or agricultural permit unit shall not be operated contrary to the conditions specified in the permit to operate.

Rule 401 – Visible Emissions. A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines.

Rule 402 – Nuisance. A person shall not discharge from any source whatsoever such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any such persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule do not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

Rule 403 – Fugitive Dust. SCAQMD Rule 403 governs emissions of fugitive dust during and after construction. Compliance with this rule is achieved through application of standard Best Management Practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.

Rule 403 requires project applicants to control fugitive dust using the best available control measures such that dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from

creating an off-site nuisance. Applicable Rule 403 dust suppression (and PM₁₀ generation) techniques to reduce impacts on nearby sensitive receptors may include, but are not limited to, the following:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Water active sites at least three times daily. Locations where grading is to occur shall be thoroughly watered prior to earthmoving.
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 feet) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour (mph) or less.
- Suspend all grading activities when wind speeds (including instantaneous wind gusts) exceed 25 mph.
- Provide bumper strips or similar best management practices where vehicles enter and exit the construction site onto paved roads, or wash off trucks and any equipment leaving the site each trip.
- Replant disturbed areas as soon as practical.
- Sweep onsite streets (and offsite streets if silt is carried to adjacent public thoroughfares) to reduce the amount of particulate matter on public streets. All sweepers shall be compliant with SCAQMD Rule 1186.1, Less Polluting Sweepers.

Rule 481 – Spray Coating. This rule applies to all spray painting and spray coating operations and equipment and states that a person shall not use or operate any spray painting or spray coating equipment unless one of the following conditions is met:

- The spray coating equipment is operated inside a control enclosure, which is approved by the Executive Officer. Any control enclosure for which an application for permit for new construction, alteration, or change of ownership or location is submitted after the date of adoption of this rule shall be exhausted only through filters at a design face velocity not less than 100 feet per minute nor greater than 300 feet per minute, or through a water wash system designed to be equally effective for the purpose of air pollution control.
- Coatings are applied with high-volume low-pressure, electrostatic and/or airless spray equipment.
- An alternative method of coating application or control is used which has effectiveness equal to or greater than the equipment specified in the rule.

Rule 1108 - Volatile Organic Compounds. This rule governs the sale, use, and manufacturing of asphalt and limits the reactive organic gases (ROG)/volatile organic compound (VOC) content in asphalt used in the Basin. This rule also regulates the VOC content of asphalt used during construction. Therefore, all asphalt used during construction of the Project must comply with SCAQMD Rule 1108.

Rule 1113 – Architectural Coatings. No person shall apply or solicit the application of any architectural coating within the SCAQMD with ROG/VOC content in excess of the values specified in a table incorporated in the Rule.

Rule 1143 – Paint Thinners and Solvents. This rule governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their ROG/VOC content. This rule regulates the ROG/VOC content of solvents used during construction. Solvents used during the construction phase must comply with this rule.

Rule 2305 – Warehouse Indirect Source Rule. On May 7, 2021, the SCAQMD Governing Board approved Rule 2305. The stated purpose of the Indirect Source Rule “is to reduce local and regional emissions of nitrogen oxides and particulate matter, and to facilitate local and regional emission reductions associated with warehouses and the mobile sources attracted to warehouses in order to assist in meeting state and

federal air quality standards for ozone and fine particulate matter.” The rule applies to owners and operators of new and existing warehouses located in the South Coast Air Basin “with greater than or equal to 100,000 square feet of indoor space in a single building that may be used for warehousing activities by one or more warehouse operators.” The rule imposes a “Warehouse Points Compliance Obligation” (WPCO) on warehouse operators. Operators would be allowed to satisfy the WPCO by accumulating “Warehouse Actions and Investments to Reduce Emissions Points” (WAIRE Points) in a given 12-month period. WAIRE Points will be awarded by implementing measures to reduce emissions listed on the WAIRE Menu, or by implementing a custom WAIRE Plan approved by the SCAQMD.

5.1.2.4 Local Regulations

City of Santa Fe Springs General Plan

The City of Santa Fe Springs General Plan contains the following policies related to air quality that are applicable to the Project (City of Santa Fe Springs, 2021):

Circulation Element

Goal C-8	A transportation system designed to reduce vehicle miles traveled.
Policy C-8.1	Reducing Vehicle Miles Traveled. Integrate transportation and land use decisions to reduce vehicle miles traveled and greenhouse gas emissions.
Policy C-8.2	Transportation Management Strategies. Evaluate the potential of transportation demand management strategies and intelligent transportation system applications to reduce vehicle miles traveled.
Policy C-8.3	Employee Incentives. Encourage businesses to provide employee incentives to utilize alternatives to conventional automobile travel (i.e., carpools, vanpools, buses, cycling, and walking).
Policy C-8.4	Air Quality. Encourage the implementation of employer transportation demand management requirements included in the South Coast Air Quality Management District’s Regulations.
Policy C-8.5	Employee Work Hours Variability. Encourage businesses to use flextime, staggered working hours, telecommuting, and other means to lessen peak commuter traffic.
Policy C-8.6	Ridesharing. Promote ridesharing through publicity and provision of information to the public through web-based apps and other approaches through collaboration with other agencies and jurisdictions.

Environmental Justice Element

Goal EJ-1	Reduced exposure to air pollution and hazardous materials.
Policy EJ-1.2	Truck Idling Restrictions. Designate acceptable and unacceptable areas for freight trucking and diesel truck idling to limit impacts on disadvantaged communities already overburdened by air pollution.
Policy EJ-1.4	Industrial Pollution. Reduce pollution exposure in residential neighborhoods by limiting industrial operations that generate potentially hazardous air pollutants.

- Policy EJ-1.5 Stationary Source Emissions.** Consult with California Air Resources Board and the South Coast Air Quality Management District to ensure the appropriate monitoring of stationary source emissions and to receive aid and assistance to reduce exposures to harmful air pollutants in disadvantaged communities.
- Policy EJ-1.7 Emission Data Collection.** Coordinate with the South Coast Air Quality Management District to explore ways to initiate data collection efforts for a community emissions reduction and/or community air monitoring plan, including the identification of: information needed (new or updated), potential data sources and the resources needed, and strategies to engage residents and collect information.
- Goal EJ-4 Increased civic engagement from disadvantaged communities**
- Policy EJ-4.4 Special Meetings.** Conduct special informational meetings for projects that could impact disadvantaged communities, including projects that may handle hazardous materials, emit air pollution, and/or create truck or rail traffic.

Conservation and Open Space Element

- Goal COS-5 An expansive urban forest and related benefits.**
- Policy COS-5.5 Environmental Benefits.** Expand urban greening to reduce air and noise pollution, reduce and clean urban runoff, increase groundwater recharge, improve ecological diversity, and help cool neighborhoods by minimizing heat island effects.
- Goal COS-8: Energy-efficient operations and structures**
- Policy COS-8.1 Efficiency of Existing Buildings.** Improve energy efficiency of existing and new buildings, such as adding energy efficient appliances and fixtures, improvements to windows, reflective shingles, roof and wall insulations, and other green building strategies.
- Policy COS-8.3 Energy Efficiency Strategies.** Encourage energy-efficient strategies of all new projects (public and private), including appropriate structure orientation and site design, passive solar approaches, the use of shade trees to maximize cooling, and to reduce fossil fuel consumption for heating and cooling.
- Policy COS-8.4 Renewable Energy Industrial Facilities.** Promote the use of renewable energy and/or solar energy for large industrial operations on building rooftops or on large properties and support solar-ready buildings for large industrial buildings and warehouses.
- Goal COS-9: Air quality conditions that improve over time**
- Policy COS-9.2 Evaluate Trucking Emissions.** Support low emission solutions and use of alternative fuels to improve trucking fleet fuel efficiency.
- Policy COS-9.4 Minimize Air Quality Impacts.** Minimize the air quality impacts of new development projects on established uses and nearby sensitive receptors.
- Policy COS-9.6 Alternative Fuels.** Prioritize alternative fuel vehicles for City use, and encourage new residential, commercial, and industrial development be equipped with alternative fueling stations.
- Policy COS-9.8 Air Quality and Climate Change Analyses.** Require detailed air quality and climate change analyses and mitigation plans for all applications that have the potential to adversely affect air quality.

Safety Element

Goal S-3 **Minimize exposure of residents, businesses, and habitats to hazardous materials and their deleterious effects.**

Policy S-3.3 **Hazardous Air Pollution.** Consult with the South Coast Air Quality Management District regarding the emissions monitoring of industrial operators that use or produce hazardous materials/toxic compounds.

5.1.3 ENVIRONMENTAL SETTING

5.1.3.1 Climate and Meteorology

The Project area is located within the South Coast Air Basin (Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Basin is a 6,600-square-mile coastal plain bounded by the Pacific Ocean to the southwest and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, and all of Orange County.

The ambient concentrations of air pollutants are determined by the amount of emissions released by sources and the atmosphere's ability to transport and dilute such emissions. Natural factors that affect transport and dilution include terrain, wind, atmospheric stability, and sunlight. Therefore, existing air quality conditions in the area are determined by such natural factors as topography, meteorology, and climate, in addition to the amount of emissions released by existing air pollutant sources.

Atmospheric conditions such as wind speed, wind direction, and air temperature gradients interact with the physical features of the landscape to determine the movement and dispersal of air pollutants. The topography and climate of southern California combine to make the Basin an area of high air pollution potential. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and San Bernardino mountains around the rest of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The usually mild climatological pattern is disrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cool marine layer and inhibits the pollutants in the marine layer from dispersing upward. In addition, light winds during the summer further limit ventilation. Furthermore, sunlight triggers the photochemical reactions which produce ozone.

5.1.3.2 Criteria Air Pollutants

The CARB and the USEPA currently focus on the following air pollutants as indicators of ambient air quality: ozone, CO, NO₂, SO₂, PM₁₀, PM_{2.5}, and lead. California has generally adopted more stringent ambient air quality standards for the criteria air pollutants (referred to as State ambient air quality standards, or state standards) and has adopted air quality standards for some pollutants for which there is no corresponding national standard, such as sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

Ozone

Ozone, the main component of photochemical smog, is primarily a summer and fall pollution problem. Ozone is not emitted directly into the air; but is formed through a complex series of chemical reactions involving other compounds that are directly emitted. These directly emitted pollutants (also known as ozone precursors) include reactive organic gases (ROGs) or volatile organic compounds (VOCs), and oxides of nitrogen (NO_x). While both ROGs and VOCs refer to compounds of carbon, ROG is a term used by CARB and is based on a list of exempted carbon compounds determined by CARB. VOC is a term used by the USEPA and is based on its own exempt list. The time period required for ozone formation allows the reacting compounds to spread over a large area, producing regional pollution problems. Ozone concentrations are the cumulative result of regional development patterns rather than the result of a few significant emission sources.

Once ozone is formed, it remains in the atmosphere for one or two days. Ozone is then eliminated through reaction with chemicals on the leaves of plants, attachment to water droplets as they fall to earth ("rainout"), or absorption by water molecules in clouds that later fall to earth with rain ("washout").

Short-term exposure to ozone can irritate the eyes and cause constriction of the airways. In addition to causing shortness of breath, ozone can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema.

Carbon Monoxide

CO is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone, motor vehicles operating at slow speeds are the primary source of CO in the Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections.

Nitrogen Dioxide

NO₂ is a reddish-brown gas that is a by-product of combustion processes. Automobiles and industrial operations are the main sources of NO₂. Combustion devices emit primarily nitric oxide (NO), which reacts through oxidation in the atmosphere to form NO₂. The combined emissions of NO and NO₂ are referred to as NO_x, which are reported as equivalent NO₂. Aside from its contribution to ozone formation, NO₂ can increase the risk of acute and chronic respiratory disease and reduce visibility. NO₂ may be visible as a coloring component of a brown cloud on high pollution days, especially in conjunction with high ozone levels.

Sulfur Dioxide

SO₂ is a colorless, extremely irritating gas or liquid that enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal, and from chemical processes occurring at chemical plants and refineries. When SO₂ oxidizes in the atmosphere, it forms sulfur trioxide (SO₃). Collectively, these pollutants are referred to as sulfur oxides (SO_x).

Major sources of SO₂ include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of SO₂ aggravate lung diseases, especially bronchitis. This compound also constricts the breathing passages, especially in people with asthma and people involved in moderate to heavy exercise. SO₂ potentially causes wheezing, shortness of breath, and coughing. Long-term SO₂ exposure has been associated with increased risk of mortality from respiratory or cardiovascular disease.

Particulate Matter

PM₁₀ and PM_{2.5} consist of particulate matter that is 10 microns or less in diameter and 2.5 microns or less in diameter, respectively (a micron is one-millionth of a meter). PM₁₀ and PM_{2.5} represent fractions of particulate matter that can be inhaled into the air passages and the lungs and can cause adverse health effects. Acute and chronic health effects associated with high particulate levels include the aggravation of chronic respiratory diseases, heart and lung disease, and coughing, bronchitis and respiratory illnesses in children. Particulate matter can also damage materials and reduce visibility. One common source of PM_{2.5} is diesel exhaust emissions.

PM₁₀ consists of particulate matter emitted directly into the air (e.g., fugitive dust, soot, and smoke from mobile and stationary sources, construction operations, fires, and natural windblown dust) and particulate matter formed in the atmosphere by condensation and/or transformation of SO₂ and ROG. Traffic generates particulate matter emissions through entrainment of dust and dirt particles that settle onto roadways and parking lots. PM₁₀ and PM_{2.5} are also emitted by burning wood in residential wood stoves and fireplaces and open agricultural burning. PM_{2.5} can also be formed through secondary processes such as airborne reactions with certain pollutant precursors, including ROGs, ammonia (NH₃), NO_x, and SO_x.

Lead

Lead is a metal found naturally in the environment and present in some manufactured products. There are a variety of activities that can contribute to lead emissions, which are grouped into two general categories, stationary and mobile sources. On-road mobile sources include light-duty automobiles; light-, medium-, and heavy-duty trucks; and motorcycles.

Emissions of lead have dropped substantially over the past 40 years. The reduction before 1990 is largely due to the phase-out of lead as an anti-knock agent in gasoline for on-road automobiles. Substantial emission reductions have also been achieved due to enhanced controls in the metals processing industry. In the Basin, atmospheric lead is generated almost entirely by the combustion of leaded gasoline and contributes less than one percent of the material collected as total suspended particulates.

5.1.3.3 Toxic Air Contaminants

Concentrations of TACs (or in federal parlance, HAPs) are also used as indicators of ambient air quality conditions. A TAC is defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations.

According to the California Almanac of Emissions and Air Quality, the majority of the estimated health risk from TACs can be attributed to relatively few compounds, the most important being particulate matter from diesel-fueled engines (i.e., DPM). DPM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances. Although DPM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emission control system is present.

Unlike the other TACs, no ambient monitoring data is available for DPM because no routine measurement method currently exists. However, CARB has made preliminary concentration estimates based on a particulate matter exposure method. This method uses the CARB emissions inventory's PM₁₀ database, ambient PM₁₀ monitoring data, and the results from several studies to estimate concentrations of DPM. In addition to DPM, the TACs for which data are available that pose the greatest existing ambient risk in

California are benzene, 1,3-butadiene, acetaldehyde, carbon tetrachloride, hexavalent chromium, para-dichlorobenzene, formaldehyde, methylene chloride, and perchloroethylene.

5.1.3.4 Carbon Monoxide Hot Spots

An adverse CO concentration, known as a “hot spot” is an exceedance of the State one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. It has long been recognized that CO hot spots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the Basin is now designated as attainment.

5.1.3.5 Odorous Emissions

Odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). Offensive odors are unpleasant and can lead to public distress generating citizen complaints to local governments. Although unpleasant, offensive odors rarely cause physical harm. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source, wind speed, direction, and the sensitivity of receptors.

5.1.3.6 Existing Conditions

SCAQMD maintains monitoring stations within district boundaries, Source/Receptor Areas (SRAs), that monitor air quality and compliance with associated ambient standards. Both CARB and the USEPA use this type of monitoring data to designate areas with air quality problems and to initiate planning efforts for improvement. The three basic designation categories are nonattainment, attainment, and unclassified. Nonattainment is defined as any area that does not meet, or that contributes to ambient air quality in a nearby area that does not meet the primary or secondary ambient air quality standard for the pollutant. Attainment is defined as any area that meets the primary or secondary ambient air quality standard for the pollutant. Unclassifiable is defined as any area that cannot be classified on the basis of available information as meeting or not meeting the primary or secondary ambient air quality standard for the pollutant. California designations include a subcategory of nonattainment-transitional, which is given to nonattainment areas that are progressing and nearing attainment.

The SCAQMD monitors levels of various criteria pollutants at 38 permanent monitoring stations and 5 single-pollutant source Lead (Pb) air monitoring sites throughout the air district.

The Project site is located within the Source Receptor Area (SRA) 5, Southeast Los Angeles County. The closest monitoring station for O₃, CO, NO₂, and PM_{2.5} is the SCAQMD Pico Rivera Monitoring Station #2 (within SRA 11, South San Gabriel Valley) approximately 4.55 miles north of the Project site. The Anaheim Monitoring Station (within SRA 17, Central Orange County) was used for PM₁₀, approximately 10.6 miles southeast of the Project site. These were selected as they were the closest monitoring stations that would be most applicable to the Santa Fe Springs air quality conditions.

The most recent three years of data available is shown in Table 5.1-2, *Air Quality Monitoring Summary 2021-2023*, and identifies the number of days ambient air quality standards were exceeded for the study area, which is considered to be representative of the local air quality at the project site. Data for O₃, CO,

NO₂, PM₁₀, and PM_{2.5} for 2021 through 2023 was obtained from the SCAQMD Air Quality Data Tables. Data for SO₂ has been omitted as attainment is regularly met in the SCAB and few monitoring stations measure SO₂ concentrations.

As indicated in the monitoring results included in Table 5.1-2, the federal PM₁₀ standard had no exceedances in 2021, 2022, or 2023. The State PM₁₀ standard was exceeded 12 times in 2021, 7 times in 2022, and 7 times in 2023. The PM_{2.5} federal standard had 3 exceedances in 2021, 1 exceedance in 2022, and 2 exceedances in 2023. The 1-hour ozone State standard was exceeded 2 times in 2021, 3 times in 2022, and 7 times in 2023. The 8-hour ozone State and Federal standard was exceeded 3 times in 2021, 2 times in 2022, and 9 times in 2023. In addition, the CO, SO₂, and NO₂ standards were not exceeded in this area during the 3-year period. See Table 5.1-3, for attainment designations for the SCAB.

Table 5.1-2: Air Quality Monitoring Summary 2021-2023

Pollutant	Standard	Year		
		2021	2022	2023
O ₃ ¹				
Maximum Federal 1-Hour Concentration (ppm)		0.104	0.123	0.120
Maximum Federal 8-Hour Concentration (ppm)		0.074	0.091	0.090
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	2	3	7
Number of Days Exceeding Federal 8-Hour Standard	> 0.070 ppm	3	2	7
Number of Days Exceeding State 8-Hour Standard	> 0.070 ppm	3	3	9
CO ¹				
Maximum Federal 1-Hour Concentration	> 35 ppm	1.8	1.6	1.8
Maximum Federal 8-Hour Concentration	> 20 ppm	1.5	1.5	1.3
NO _x ¹				
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.072	0.065	58.1
Annual Federal Standard Design Value		17.5	0.017	15.2
PM ₁₀ ²				
Maximum Federal 24-Hour Concentration (µg/m ³)	> 150 µg/m ³	115	90	146
Number of Days Exceeding Federal 24-Hour Standard	> 150 µg/m ³	0	0	0
Number of Days Exceeding State 24-Hour Standard	> 50 µg/m ³	12	7	7
PM _{2.5} ¹				
Maximum Federal 24-Hour Concentration (µg/m ³)	> 35 µg/m ³	66	53.8	54.6
Number of Days Exceeding Federal 24-Hour Standard	> 35 µg/m ³	3	1	2

Notes: O₃ = ozone, CO = carbon monoxide, PM₁₀ = particulate matter (10 microns), PM_{2.5} = particulate matter (2.5 microns), NO_x = nitrogen oxides, ppm = parts per million, µg/m³ = micrograms per cubic meter of air

¹ Data for O₃, CO, NO_x, and PM_{2.5} obtained from SRA 11 South San Gabriel Valley Pico Rivera Monitoring Station.

² Data for PM₁₀ obtained from SRA 17 Central Orange County Anaheim Monitoring Station.

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Table 5.1-3: Attainment Status of Criteria Pollutants in the South Coast Air Basin

Criteria Pollutant	State Designation	Federal Designation
O ₃ – 1-hour standard	Nonattainment	--
O ₃ – 8-hour standard	Nonattainment	Nonattainment
PM ₁₀	Nonattainment	Attainment
PM _{2.5}	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/Attainment
NO ₂	Attainment	Unclassifiable/Attainment
SO ₂	Attainment	Unclassifiable/Attainment
Pb ¹	Attainment	Unclassifiable/Attainment

Notes: O₃ = ozone, PM₁₀ = particulate matter (10 microns), PM_{2.5} = particulate matter (2.5 microns), CO = carbon monoxide, NO₂ = nitrogen dioxide, SO₂ = sulfur dioxide, Pb = lead

1. The federal nonattainment designation for lead is only applicable towards the Los Angeles County portion of the SCAB.

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

The 26.77-acre Project site is currently utilized for oil well activities. Air quality emissions are currently generated by the operation of the existing oil well uses and the related vehicle trips.

5.1.3.7 Sensitive Land Uses

Land uses such as schools, children's daycare centers, hospitals, and convalescent homes are considered to be more sensitive to poor air quality than the general public according to the thresholds below, because the population groups associated with these uses have increased susceptibility to respiratory distress. In addition, residential uses are considered more sensitive to air quality conditions than commercial and industrial uses, because people generally spend longer periods of time at their residences, resulting in greater exposure to ambient air quality conditions. Recreational land uses are considered moderately sensitive to air pollution. Exercise places a high demand on respiratory functions, which can be impaired by air pollution, even though exposure periods during exercise are generally short. In addition, noticeable air pollution can detract from the enjoyment of recreation.

The Project site is surrounded by industrial uses to the west, north, and east, and residential uses to the south. The project is bound by vacant parcels to the east and south which are proposed to have industrial buildings developed by the project opening year. The closest sensitive receptors to the Project site is a residential apartment community that is 357 feet (109 meters) south of the Project site boundary.

5.1.4 THRESHOLDS OF SIGNIFICANCE

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- AQ-1 Conflict with or obstruct implementation of the applicable air quality plan.
- AQ-2 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.
- AQ-3 Expose sensitive receptors to substantial pollutant concentrations.
- AQ-4 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Regional Significance Thresholds

The SCAQMD's existing regional significance thresholds for regulated pollutants are listed in Table 5.1-4. The SCAQMD's CEQA air quality methodology provides that any projects that result in daily emissions that exceed any of the thresholds in Table 5.1-4 would result in both an individually (project-level) and cumulatively significant air quality impact.

Table 5.1-4: SCAQMD Regional Air Quality Thresholds

Air Pollutant	Maximum Daily Emissions (pounds/day)	
	Construction	Operational
ROGs	75	55
NO _x	100	55
CO	550	550
SO ₂	150	150
PM ₁₀	150	150
PM _{2.5}	55	55

Notes: ROGs = reactive organic gases, CO = carbon monoxide, SO₂ = sulfur dioxide, NO_x = nitrogen oxides, PM₁₀ = particulate matter (10 microns), PM_{2.5} = particulate matter (2.5 microns)

Local Significance Thresholds

SCAQMD has also developed localized significance thresholds (LSTs) that represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards, and thus would not cause or contribute to localized air quality impacts. LSTs are developed based on the ambient concentrations of that pollutant for each of the 38 source receptor areas (SRAs) in the Basin, which include the City of Santa Fe Springs and surrounding areas. The localized thresholds, which are found in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by SCAQMD, were developed for use on projects that are less than or equal to 5-acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM₁₀, and PM_{2.5}.

Table 5.1-5, *Daily Acres Disturbed*, shows that, based on the size of the Project site and the default acres of grading derived from CalEEMod, the Project construction would disturb a maximum of 4 acres per day, with the most disturbed acres occurring during the site preparation and grading phases of construction.

Table 5.1-5: Daily Acres Disturbed

Activity	Equipment Type	Equipment Quantity	Operating Hours per Day	Acres Disturbed per Piece of Equipment per Day	Acres Disturbed per Day
Demolition	Rubber Tired Dozers	2	8	0.5	1
Total Acres Disturbed Per Day					1
Site Preparation	Rub Tired Dozers	3	8	0.5	1.5
	Crawler Tractors	4	8	0.5	2
Total Acres Disturbed Per Day					3.5

Activity	Equipment Type	Equipment Quantity	Operating Hours per Day	Acres Disturbed per Piece of Equipment per Day	Acres Disturbed per Day
Grading	Crawler Tractors	2	8	0.5	1
	Rub Tired Dozers	1	8	0.5	0.5
	Scrapers	2	8	1	2
	Graders	1	8	0.5	0.5
Total Acres Disturbed Per Day					4
Max Acres Graded Per Day					4

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

The Project site is located within SRA 5, Southeast Los Angeles County. SCAQMD provides LST screening tables for 25, 50, 100, 200, and 500-meter source-receptor distances. The closest sensitive receptors to the Project site are residential uses located approximately 357 feet (109 meters) south of the Project site. Pursuant to SCAQMD methodology, a threshold for 100 meters was utilized to allow for a conservative threshold. This approach is conservative as it assumes that all on-site emissions associated with the Project would occur within a concentrated 4-acre area at a distance of 100 meters. This screening method would therefore over-predict potential localized impacts, because by assuming that on-site operational activities are occurring within a small area, the resulting concentrations of air pollutants are more highly concentrated once they reach the smaller site boundary than they would be for activities if they were spread out over the entire 26.77-acre site. As such, LSTs for a 4-acre site are used as a screening tool to determine if there is a potential for impacts to occur. Table 5.1-6 lists the thresholds that are used to evaluate construction related LST emissions.

Table 5.1-6: SCAQMD Construction Localized Significance Thresholds

Air Pollutant	Maximum Daily Emissions (pounds/day)
NO _x	157.7
CO	2,123.3
PM ₁₀	53.0
PM _{2.5}	13.3

Notes: NO_x = nitrogen dioxides, CO = carbon monoxide, PM₁₀ = particulate matter (10 microns), PM_{2.5} = particulate matter (2.5 microns). Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

According to the SCAQMD LST methodology, LSTs apply to Project operational stationary and on-site mobile sources. Projects that involve mobile sources spending long periods queuing and idling at a site, such as transfer facilities or warehousing and distribution buildings, have the potential to exceed the operational localized significance thresholds.

As the Project's site is 26.77-acres, the threshold for 5-acres was utilized to yield a conservative analysis, and again utilizing the 100-meter distance from the nearest sensitive receptor, which is 109 meters south of the Project site boundary. These thresholds were calculated and are listed in Table 5.1-7, using the same SCAQMD recommended LST methodology that utilizes the 5-acre threshold and 100-meter distance from nearest receptor.

Table 5.1-7: SCAQMD Operational Localized Significance Thresholds

Air Pollutant	Maximum Daily Emissions (pounds/day)
NO _x	176.0
CO	2,437.0
PM ₁₀	15.0
PM _{2.5}	4.0

Notes: NO_x = nitrogen dioxides, CO = carbon monoxide, PM₁₀ = particulate matter (10 microns), PM_{2.5} = particulate matter (2.5 microns)

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

CO Hot Spots

Areas of vehicle congestion have the potential to create pockets of CO called hot spots. These pockets have the potential to exceed the State one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations. Hot spots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. With the turnover of older vehicles and introduction of cleaner fuels as well as implementation of control technology on industrial facilities, CO concentrations in the Basin and the State have steadily declined. The analysis of CO hot spots compares the volume of traffic that has the potential to generate a CO hot spot and the volume of traffic with implementation of the proposed Project.

Diesel Mobile Source Health Risk Threshold

Cancer risk is expressed in terms of expected incremental incidence per million population. The SCAQMD has established an incidence rate of 10 persons per million as the maximum acceptable incremental cancer risk due to DPM exposure. Non-cancer health risks are conveyed in terms of the Hazard Index (HI). A ratio of the predicted concentration of the facility's reported toxic air contaminants (TACs) emissions to a concentration is considered acceptable to public health professionals. A significant risk is defined as an HI of 1.0 or greater. These thresholds serve to determine whether or not a given project has a potentially significant development-specific and cumulative impact. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. Thus, the project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are not considered to be cumulatively significant.

5.1.5 METHODOLOGY

This analysis focuses on the nature and magnitude of the change in the air quality environment due to implementation of the proposed Project, based on the maximum development assumptions that are outlined in Section 3.0, *Project Description*.

Air pollutant emissions associated with the proposed Project would result from construction equipment usage and from construction-related traffic. Additionally, emissions would be generated from operations of the future warehouses and from traffic volumes generated by this new use. The net increase in emissions generated by these activities and other secondary sources have been quantitatively estimated and compared to the applicable thresholds of significance recommended by SCAQMD.

AQMP Consistency

SCAQMD's CEQA Handbook suggests an evaluation of the following two criteria to determine whether a project involving a legislative land use action (such as the proposed General Plan land use and zoning designation changes) would be consistent or in conflict with the AQMP:

1. The project would not generate population and employment growth that would be inconsistent with SCAG's growth forecasts.
2. The project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Consistency Criterion No. 1 refers to the SCAG's growth forecast and associated assumptions included in the AQMP. The future air quality levels projected in the AQMP are based on SCAG's growth projections, which are based, in part, on the general plans of cities and counties located within the SCAG region, and, in part, on SCAG's three Land Development Categories. Therefore, if the level of housing or employment related to the proposed Project are consistent with the applicable assumptions used in the development of the AQMP, the Project would not jeopardize attainment of the air quality levels identified in the AQMP.

Consistency Criterion No. 2 refers to the California Ambient Air Quality Standards (CAAQS). An impact would occur if the long-term emissions associated with the proposed Project would exceed SCAQMD's regional significance thresholds for construction and/or operation-phase emissions.

Construction

Short-term construction-generated emissions of criteria air pollutants and ozone precursors from development of the Project were assessed in accordance with methods recommended by SCAQMD. The Project's regional emissions were modeled using the California Emissions Estimator Model (CalEEMod), as recommended by SCAQMD. CalEEMod was used to determine whether short-term construction-related emissions of criteria air pollutants associated with the proposed Project would exceed applicable regional thresholds and where mitigation would be required. Modeling was based on Project-specific data and predicted short-term construction-generated emissions associated with the Project and were compared with applicable SCAQMD regional thresholds for determination of significance.

In addition, to determine whether or not construction activities associated with development of the Project would create significant adverse localized air quality impacts on nearby sensitive receptors, the worst-case daily emissions contribution from the proposed Project was compared to SCAQMD's LSTs that are based on the pounds of emissions per day that can be generated by a project without causing or contributing to adverse localized air quality impacts. The daily total on-site combustion, mobile, and fugitive dust emissions associated with construction were combined and evaluated against SCAQMD's LSTs for a 4-acre site.

Operations

Long-term (i.e., operational) regional emissions of criteria air pollutants and precursors, including mobile- and area-source emissions from the Project, were also quantified using the CalEEMod computer model. Area-source emissions were modeled according to the size and type of the land uses proposed. Mass mobile-source emissions were modeled based on the increase in daily vehicle trips that would result from the proposed Project. Trip generation rates were available from the Traffic Impact Analysis (Appendix O) prepared for the proposed Project. Predicted long-term operational emissions were compared with applicable SCAQMD thresholds for determination of significance.

Trip Length

Construction: The hauling trip length during grading was adjusted from the CalEEMod default 20.0 miles to 31.1 miles to account for the extended mileage for export hauling trips. The average of the assumed import trip length of 20 miles and the export trip length of 80 miles (trip distance to City of Adelanto, which is where the contaminated soil would be disposed of, is approximately 80 miles away) over the total import and export truck trips, 15,866 and 3,125 trips, respectively, resulted in a trip length of 29.9 miles, but a previous estimate of 31.1 miles was used and provides a conservative estimate of the hauling trip length.

Operation: The trip rate was adjusted to match the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition auto trip rates for manufacturing and warehouse trips. Truck trip lengths were obtained from the WAIRE Menu Technical Report Appendix B, Truck Trip Lengths (South Coast Air Quality Management District, 2021). To determine emissions from trucks for the proposed industrial uses, the analysis incorporated the SCAQMD recommended truck trip length, applied to the User Defined Industrial land use in CalEEMod, where 2-axle trucks were assumed to have a 15.3 mile trip length were applied to non-residential H-W (home to work trips); 3-axle trucks with a 14.2 mile trip length were applied to non-residential W-O (work to other); and 4+ axle trucks with a 40 mile trip length were applied to non-residential O-O (other to other trips). The vehicle splits for 2-axle trucks (33.5 percent), 3-axle trucks (11.7 percent), and 4-axle trucks (54.8 percent) were based on the operational trip generation provided by the VMT Screening Analysis that was prepared for the Project.

On-site Equipment Emissions

It is anticipated that the Project would utilize two emergency generators and two fire pumps were assumed to operate 1 hour a day for a total of 50 hours per year in accordance SCAQMD Rule 1470, that requires stationary diesel-fueled internal combustion shall not operate more than 50 hours per year. The Project would also require operation of exterior cargo handling equipment in the buildings' truck court areas. The modeled operational equipment includes one compressed natural gas¹ (CNG) fueled forklift per 10,000 SF would be used for operational purposes, totaling 58 forklifts were assumed, with 29 CNG and 29 electric that would operate 4 hours a day, 365 days a year, for a conservative analysis.

5.1.6 ENVIRONMENTAL IMPACTS

IMPACT AQ-1: THE PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE APPLICABLE AIR QUALITY PLAN.

¹ The proposed Project would not connect to natural gas. Therefore, the air quality modeling provides a conservative analysis.

Less Than Significant with Mitigation Incorporated.

The SCAQMD's 2022 AQMP is the applicable air quality plan for the proposed Project site. Pursuant to Consistency Criterion No. 1, the SCAQMD's 2022 AQMP is the applicable air quality plan for the proposed Project site. Projects that are consistent with the regional population, housing, and employment forecasts identified by SCAG are considered to be consistent with the AQMP growth projections, since the forecast assumptions by SCAG forms the basis of the land use and transportation control portions of the AQMP. Additionally, because SCAG's regional growth forecasts are based upon, among other things, land uses designated in general plans, a project that is consistent with the land use designated in a general plan would also be consistent with the SCAG's regional forecast projections, and thus also with the AQMP growth projections.

The Project site has a General Plan land use designation of Industrial and a zoning designation of Heavy Manufacturing (M-2). The Industrial land use designation is intended to provide locations for general industrial, manufacturing, outdoor storage, and logistic activities at a maximum floor area ratio (FAR) of 0.75. The M-2 zone district provides sites for heavy industrial uses, oil and gas drilling, select manufacturing operations, salvage operations, automobile and truck services, and similar compatible uses (Santa Fe Springs Municipal Code Section 155.241). Warehouse uses are permitted within the M-2 zone.

The proposed Project would result in two parcels with two industrial buildings. The proposed Building 1 would be approximately 298,373 SF with a FAR of 0.51 and the proposed Building 2 would be approximately 286,305 SF with a FAR of 0.49. Thus, buildout of the Project site would be within the General Plan buildout assumptions for the proposed Project site. As the Project is consistent with the General Plan land use buildout it would also be consistent with the SCAG's regional forecast projections, and thus also with the AQMP growth projections. Therefore, the Project is consistent with the SCAQMD 2022 AQMP and would not result in an impact related to Criterion No.1.

Regarding Consistency Criterion No. 2, which evaluates the potential of the proposed Project to increase the frequency or severity of existing air quality violations, as described previously, an impact related to Consistency Criterion No. 2 would occur if the long-term emissions associated with the proposed Project would exceed SCAQMD's regional significance thresholds for operation-phase emissions. As discussed below under Impact AQ-2, the Project's net operational activities would not exceed the numerical thresholds of significance established by the SCAQMD for emissions of any criteria pollutants and impacts would be less than significant. Construction of the proposed Project would result in regional construction-source emissions that would exceed the SCAQMD thresholds of significance for emissions of ROG. However, proposed Mitigation Measure AQ-1 would require the proposed Project to use low ROG paints and would reduce ROG emissions to less than significant levels.

Thus, the proposed Project's would be consistent with SCAG's regional growth forecasts, and the proposed Project would not lead to increased regional air quality construction or operational emissions that would exceed thresholds with the inclusion of Mitigation Measure AQ-1. The proposed Project would not result in a conflict with, or obstruct, implementation of the AQMP and impacts would be less than significant after implementation of Mitigation Measure AQ-1.

IMPACT AQ-2: THE PROJECT WOULD NOT 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.

Less than Significant with Mitigation Incorporated.

Construction

Construction activities associated with the Project would result in emissions of CO, ROG, NO_x, SO_x, PM₁₀, and PM_{2.5}. Pollutant emissions associated with construction would be generated from the following construction activities: (1) site preparation; (2) grading; (3) building construction; (4) architectural coatings and (5) off-site utility and infrastructure improvements. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants. In addition, emissions would result from the import of approximately 126,929 CY of soil and export of approximately 25,000 CY of contaminated soil.

Construction emissions are short-term and temporary. The maximum daily construction emissions for the proposed Project were estimated using CalEEMod; and the modeling includes compliance with SCAQMD Rules 403 and 1113 (described above), which are included as PPP AQ-1 and PPP AQ-2 and would reduce air contaminants during construction. Table 5.1-8 provides the maximum daily emissions of criteria air pollutants from construction of the Project. As shown, maximum ROG daily emissions during the architectural coating phase are 139.3 pounds/day, exceeding the SCAQMD regional threshold of 75 pounds/day.

Table 5.1-8: Construction Emissions Summary Without Mitigation Measures

Construction Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2025						
Demolition	2.6	35.8	32.0	0.0	7.7	4.4
Site Preparation	3.9	35.8	32.0	0.0	7.7	4.4
Grading	4.0	53.8	41.4	0.2	9.3	3.9
Maximum Daily Emissions	4.0	53.8	41.4	0.2	9.3	4.4
2026						
Grading	3.8	51.0	40.1	0.2	9.2	3.8
Building	2.1	16.9	31.5	0.1	4.5	1.4
Paving	2.3	7.2	10.8	0.0	0.5	0.3
Architectural Coating	139.3	1.4	4.2	0.0	0.7	0.2
Maximum Daily Emissions	139.3	51.0	40.1	0.2	9.2	3.8
2027						
Architectural Coating	139.3	1.3	4.0	0.0	0.7	0.2
Maximum Daily Emissions	139.3	1.3	4.0	0.0	0.7	0.2
Maximum Daily Emission 2025-2027	139.3	53.8	41.4	0.2	9.3	4.4
SCAQMD Significance Thresholds	75	100	550	150	150	55
Threshold Exceeded?	Yes	No	No	No	No	No

Notes: ROG = reactive organic gases, CO = carbon monoxide, SO₂ = sulfur dioxide, NO_x = nitrogen oxides, PM₁₀ = particulate matter (10 microns), PM_{2.5} = particulate matter (2.5 microns)

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

However, Mitigation Measure AQ-1 requires the proposed Project to use low ROG paints to reduce ROG emissions to less than significant levels, as shown on Table 5.1-9. Therefore, criteria emissions impacts related to construction of the proposed Project would be less than significant with the implementation of Mitigation Measure AQ-1.

Table 5.1-9: Mitigated Architectural Coating Regional Construction Emission

Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2026						
Architectural Coating	69.8	1.4	4.2	0.0	0.7	0.2
2027						
Architectural Coating	69.8	1.3	4.0	0.0	0.7	0.2
Maximum Daily Emission 2026-2027	69.8	1.3	4.2	0.0	0.7	0.2
SCAQMD Significance Thresholds	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Notes: ROG_s = reactive organic gases, CO = carbon monoxide, SO₂ = sulfur dioxide, NO_x = nitrogen oxides, PM₁₀ = particulate matter (10 microns), PM_{2.5} = particulate matter (2.5 microns)

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Operation

Implementation of the proposed Project would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with area sources, such as natural gas² consumption, landscaping, applications of architectural coatings, and consumer products such as cleaning compounds, detergents, personal care products and garden products. Operation of the proposed Project would include emissions from vehicles traveling to the Project site and from vehicles in the parking lots and loading areas. Area source emissions would occur from operation of Two emergency generators and two fire pumps were assumed to operate 1 hour a day for a total of 50 hours per year, which would be regulated by and require a permit from SCAQMD per SCAQMD Rule 1470. Additionally, 58 forklifts were assumed, with 29 (Compressed Natural Gas) CNG and 29 electric operated would be utilized. As shown in Table 5.1-10, the Project's net operational activities would not exceed the numerical thresholds of significance established by the SCAQMD for emissions of any criteria pollutants and impacts would be less than significant.

Table 5.1-10: Summary of Peak Operational Emissions

Operational Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile	3.9	33.1	45.8	0.3	17.9	5.0
Area	18.3	0.2	25.4	0.0	0.0	0.0
Energy	0.2	3.5	2.9	0.0	0.3	0.3
Off-Road	0.0	12.8	127.7	0.0	0.0	0.0
Stationary	1.6	4.4	4.0	0.0	0.2	0.2
Total Operational Emissions	24.0	54.0	205.9	0.4	18.5	5.6
SCAQMD Significance Thresholds	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Notes: ROG_s = reactive organic gases, CO = carbon monoxide, SO₂ = sulfur dioxide, NO_x = nitrogen oxides, PM₁₀ = particulate matter (10 microns), PM_{2.5} = particulate matter (2.5 microns)

² The proposed Project would not connect to natural gas. Therefore, the air quality modeling provides a conservative analysis.

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Health Impacts of Emissions

The potential health impacts of criteria pollutants are analyzed on a regional level, not on a facility/project level. The SCAQMD and the San Joaquin Valley Unified Air Pollution Control District (SJVAPD), experts in the area of air quality, both recognize that a meaningful, accurate analysis of potential health impacts resulting from criteria pollutants is not currently possible and not likely to yield substantive information that promotes informed decision making. The SJVAPD, in its amicus curiae brief for the recent California Supreme Court decision in *Sierra Club v. County of Fresno* (2018)6 Cal.5th 502, explained that “it is not feasible to conduct a [health impact analysis] for criteria air pollutants because currently available computer modeling tools are not equipped for this task.” The SJVAPD described a project-specific health impact analysis as “not practicable and not likely to yield valid information” because “currently available modeling tools are not well suited for this task.” The SJVAPD further noted that “...the CEQA air quality analysis for criteria pollutants is not really a localized, project-level impact analysis but one of regional” cumulative impacts.

Most local agencies, including the City of Santa Fe Springs, lack the data to do their own assessment of potential health impacts from criteria air pollutant emissions, as would be required to establish customized, locally-specific thresholds of significance based on potential health impacts from an individual development project. The use of national or “generic” data to fill the gap of missing local data would not yield accurate results because such data does not capture local air patterns, local background conditions, or local population characteristics, all of which play a role in how a population experiences air pollution. Because it is impracticable to accurately isolate the exact cause of a human disease (for example, the role a particular air pollutant plays compared to the role of other allergens and genetics in causing asthma), existing scientific tools cannot accurately estimate health impacts of the Project’s air emissions without undue speculation. Instead, readers are directed to the Project’s air quality impact analysis above, which provides extensive information concerning the quantifiable and non-quantifiable health risks related to the Project’s construction and long-term operation.

The EIR does analyze localized operational impacts associated with the Project’s emissions, below under Impact AQ-3, and concludes that such impacts would be less than significant. The SCAQMD’s Localized Significance Thresholds (“LST”) represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard with implementation of mitigation and are developed based on the ambient concentrations of that pollutant for each source receptor and distance to the nearest sensitive receptor. Therefore, the Project would not generate emissions on a localized scale that are expected to result in an exceedance of applicable standards, which are intended to be protective of public health. As discussed above, the Project’s regional emissions would be less than the SCAQMD’s regional thresholds. As discussed above, given the regional nature of such emissions and numerous unpredictable factors, an analysis that correlates health with regional emissions is not possible. It should also be noted that the EIR does identify health concerns related to NO_x emissions. Table 5.1-1, *Ambient Air Quality Standards for Criteria Pollutants*, includes a list of criteria pollutants and summarizes common sources and effects. Thus, the EIR’s analysis is reasonable and intended to foster informed decision making and impacts related to regional emissions would be less than significant.

IMPACT AQ-3: THE PROJECT WOULD NOT EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS.

Less than Significant Impact.

Localized Construction Air Quality Impacts

As discussed previously, the daily construction emissions generated on-site by the proposed Project are evaluated against SCAQMD's LSTs for a 4-acre site for construction activities to determine whether the emissions would cause or contribute to adverse localized air quality impacts.

The appropriate SRA for the LST analysis is SRA 5, Southeast Los Angeles County. SCAQMD provides LST screening tables for 25, 50, 100, 200, and 500-meter source-receptor distances. The closest sensitive receptors to the Project site are residential located approximately 357 feet (109 meters) south of the Project site.

Table 5.1-11 identifies daily localized emissions that are estimated to occur during construction of the Project. As shown, emissions during the peak construction activity would not exceed the SCAQMD's localized significance thresholds. Therefore, impacts would be less than significant.

Table 5.1-11: Localized Construction-Source Emissions without Mitigation

Construction Activity	Maximum Daily Localized Emissions (pounds/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
2025				
Demolition	23.5	22.3	1.0	0.9
Site Prep	35.7	30.8	7.5	4.3
Grading	33.9	32.4	4.2	2.4
Maximum Daily Emissions	35.7	32.4	7.5	4.3
2026				
Grading	31.2	31.7	4.1	2.3
Building	21.3	30.8	7.5	4.3
Paving	7.1	9.9	0.3	0.3
Architectural Coating	1.1	1.5	0.0	0.0
Maximum Daily Emissions	31.2	31.7	7.5	4.3
2027				
Architectural Coating	1.1	1.5	0.0	0.0
Maximum Daily Emissions	1.1	1.5	0.0	0.0
Maximum Daily Emission 2025-2027	33.9	32.4	4.2	2.4
SCAQMD Significance Thresholds	157.7	2,123.3	53.0	13.3
Threshold Exceeded?	No	No	No	No

Notes: CO = carbon monoxide, NO_x = nitrogen oxides, PM₁₀ = particulate matter (10 microns), PM_{2.5} = particulate matter (2.5 microns). Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

Localized Operational Air Quality Impacts

As shown on Table 5.1-12, emissions from operation of the Project would not exceed the SCAQMD's localized significance thresholds for any criteria pollutant at the nearest sensitive receptor. Therefore, implementation of the proposed Project would result in a less than significant impact related to localized operational emissions.

Table 5.1-12: Localized Significance Emissions from Project Operation

Operational Activity	Maximum Daily Localized Emissions (pounds/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Mobile	5.0	11.5	0.8	0.2
Area	0.2	25.4	0.0	0.0
Energy	3.5	2.9	0.3	0.3
Off-Road	12.8	127.7	0.0	0.0
Stationary	4.4	4.0	0.2	0.2
Total Project Operational Emissions	25.9	171.6	1.4	0.8
SCAQMD Significance Thresholds	176.0	2,437.0	15.0	4.0
Threshold Exceeded?	No	No	No	No

Notes: CO = carbon monoxide, NO_x = nitrogen oxides, PM₁₀ = particulate matter (10 microns), PM_{2.5} = particulate matter (2.5 microns). Source: Air Quality, Energy, and GHG Impact Analysis (**Appendix B**)

CO Hot Spots

An adverse CO concentration, known as a “hot spot,” would occur if an exceedance of the State’s one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur. The 2003 AQMP estimated traffic volumes that could generate CO concentrations to result in a “hot spot”. As shown in Table 5.1-13, the busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vehicles per hour (vph) and AM/PM traffic volumes of 8,062 vph and 7,719 vph respectively. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm; this indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day, CO concentrations (4.6 ppm x 4= 18.4 ppm) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm).

Table 5.1-13: Traffic Volumes for Intersections Evaluated in 2003 AQMP

Intersection Location	Peak Traffic Volumes (vph)				
	Eastbound (a.m./p.m.)	Westbound (a.m./p.m.)	Southbound (a.m./p.m.)	Northbound (a.m./p.m.)	Total (a.m./p.m.)
Wilshire-Veteran	4,954/2,069	1,830/3,317	721/1,400	560/933	8,062/7,719
Sunset-Highland	1,417/1,764	1,342/1,540	2,304/1,832	1,551/2,238	6,614/5,374
La Cienega-Century	2,540/2,243	1,890/2,728	1,384/2,029	821/1,674	6,634/8,674
Long Beach-Imperial	1,217/2,020	1,760/1,400	479/944	756/1,150	4,212/5,514

Source: SCAQMD 2003 AQMP

Operation of the proposed Project at buildout would result in 1,394 daily weekday trips, of these 130 would occur during AM peak hour and a total of 138 new trips in the PM peak hour through area intersections. These trips would be distributed throughout the vicinity of the Project and would not result in daily traffic volumes of 100,000 vehicles per day or more. As such, Project-related traffic volumes are less than the traffic volumes identified in the 2003 AQMP; and are not high enough to generate a CO “hot spot”. Therefore, impacts related to CO “hot spots” from operation of the proposed Project would be less than significant.

Frant Ranch Case

In December 2018, in the case of *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, California Supreme Court held that an EIR’s air quality analysis must meaningfully connect the identified air quality impacts to

the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided. As noted in the *Brief of Amicus Curiae* by the SCAQMD in the Friant Ranch case (April 6, 2015, Appendix 10.1), SCAQMD has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes.

The SCAQMD discusses that it may be infeasible to quantify health risks caused by projects similar to the proposed Project, due to many factors. It is necessary to have data regarding the sources and types of air toxic contaminants, location of emission points, velocity of emissions, the meteorology and topography of the area, and the location of receptors (worker and residence). The *Brief* states that it may not be feasible to perform a health risk assessment for airborne toxins that will be emitted by a generic industrial building that was built on "speculation" (i.e., without knowing the future tenant(s)). Even where a health risk assessment can be prepared, however, the resulting maximum health risk value is only a calculation of risk--it does not necessarily mean anyone will contract cancer as a result of the Project. The *Brief* also cites the author of the CARB methodology, which reported that a PM_{2.5} methodology is not suited for small projects and may yield unreliable results. Similarly, SCAQMD staff does not currently know of a way to accurately quantify O₃-related health impacts caused by NO_x or ROG emissions from relatively small projects, due to photochemistry and regional model limitations. The *Brief* concludes, with respect to the Friant Ranch EIR, that although it may have been technically possible to plug the data into a methodology, the results would not have been reliable or meaningful.

On the other hand, for extremely large regional projects (unlike the proposed Project), the SCAQMD states that it has been able to correlate potential health outcomes for very large emissions sources – as part of their rulemaking activity, specifically 6,620 lbs./day of NO_x and 89,180 lbs./day of ROG were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to O₃.

The proposed Project does not generate anywhere near 6,620 lbs./day of NO_x or 89,190 lbs./day of ROG emissions. As shown previously in Tables 5.1-8 and 5.1-10, the Project would generate up to 53.8 lbs./day of NO_x during construction and 54.0 lbs./day of NO_x during operations (0.8 percent of 6,620 lbs./day for both). The ROG emissions would be a maximum of 69.8 lbs./day during construction with mitigation and 24 lbs./day of during operations (0.08 percent and 0.03 of 89,190 lbs./day).

Therefore, the emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level. Notwithstanding, this evaluation does evaluate each of the Project's development scenarios localized impacts to air quality for emissions of CO, NO_x, PM₁₀, and PM_{2.5} by comparing the on-site emissions to the SCAQMD's applicable LST thresholds. In addition, a Construction and Operational Health Risk Assessment was prepared, which is discussed below. As described previously, the proposed Project would not result in emissions that exceeded the SCAQMD's LSTs. Therefore, the proposed Project would not be expected to exceed the most stringent applicable federal or State ambient air quality standards for emissions of CO, NO_x, PM₁₀, and PM_{2.5}.

Diesel Mobile Source Health Risk

A Health Risk Assessment, included as Appendix C, was prepared to evaluate the health risk impacts as a result of exposure to DPM as a result of heavy-duty diesel trucks traveling to and from the site, maneuvering on-site, and entering and leaving the site during construction and operation of the proposed Project. The location of truck activity during construction and operational activities are shown on Figure 5.1-1 and 5.1-2. On-site truck idling was estimated to occur as trucks enter and travel through the facility. Although the proposed uses are required to comply with CARB's idling limit of 5 minutes, SCAQMD recommends that the on-site idling emissions should be estimated for 15 minutes of truck idling, which takes into account on-site idling that occurs while the trucks are waiting to pull up to the truck bays, idling at the bays, idling at check-

in and check-out, etc. As such, this analysis estimated truck idling at 15 minutes, consistent with SCAQMD's recommendation.

SCAQMD recommends using a risk level of 10 in one million as the cancer risk threshold. A risk level of 10 in one million implies a likelihood that up to 10 people, out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the levels of toxic air contaminants over a specified duration of time. Non-cancer health risks are conveyed in terms of the Hazard Index (HI). A ratio of the predicted concentration of the facility's reported toxic air contaminants (TACs) emissions to a concentration is considered acceptable to public health professionals. A significant risk is defined as an HI of 1.0 or greater.

Construction Impacts

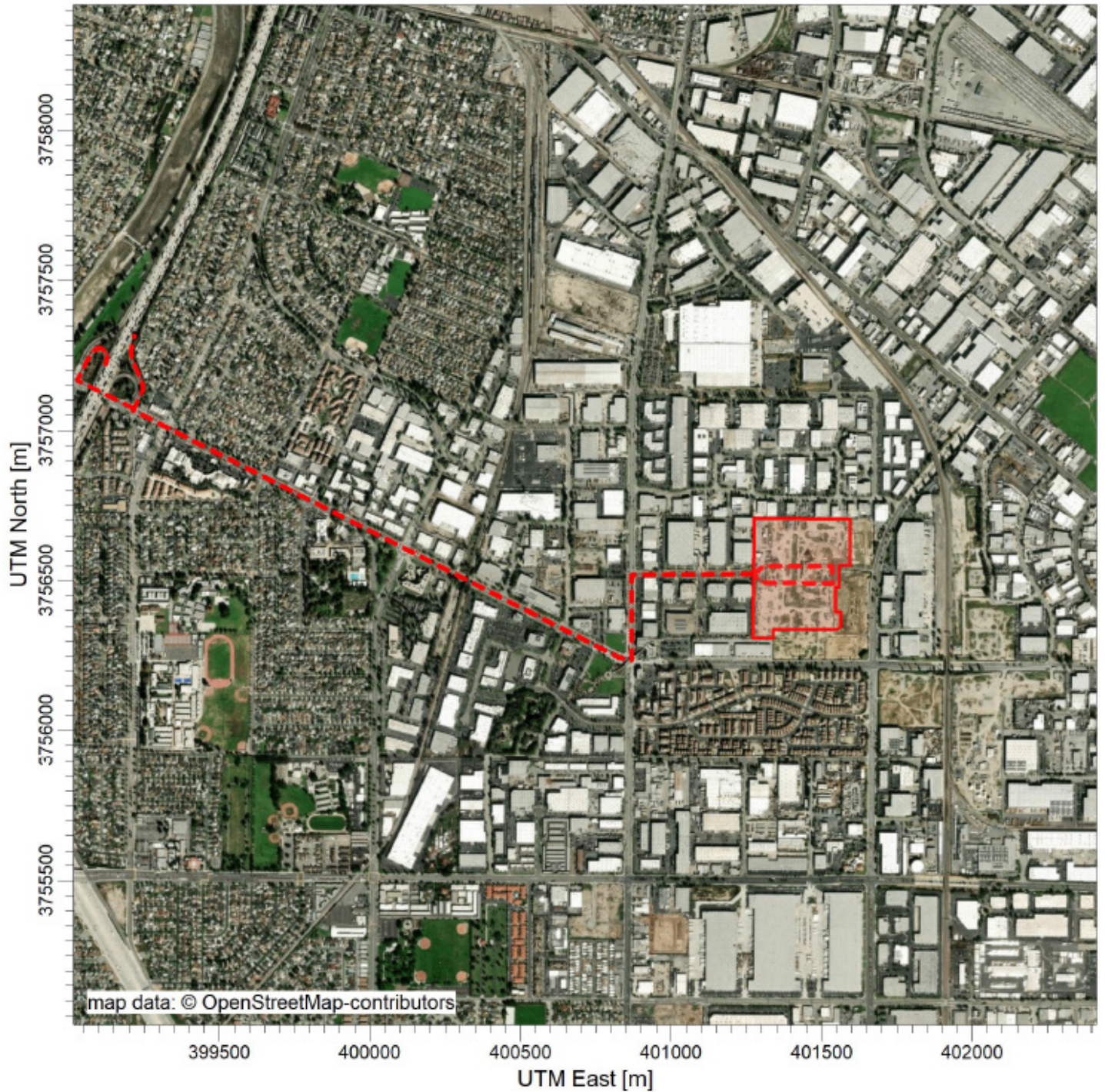
The land use with the greatest potential exposure to Project construction-source DPM emissions is a residential apartment community that is 357 feet (109 meters) south of the Project site boundary, while the nearest worker receptor was located at a manufacturing building 1.91 meters (6 feet) to the east of the Project boundary. As shown in Table 5.1-14, at the maximum individual cancer risk (MICR) attributable to Project construction-source DPM emissions is estimated at 0.85 in one million, which is less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be 0.02, which would not exceed the applicable threshold of 1.0. The location analyzed is the nearest receptor to the Project site and would experience the highest concentrations of DPM during Project construction due to meteorological conditions at the site. Because all other receptors would experience lower concentrations of DPM during Project construction, all other receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIR (maximally exposed individual resident) identified herein. As such, the Project will not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction activity. All other receptors during construction activity would experience less risk than what is identified for this location. As such, construction of the Project would not cause a significant human health or cancer risk to nearby residences and impacts would be less than significant.

Table 5.1-14: Summary of Construction Cancer and Non-Cancer Risks

Receptor	Cancer Risk (per million)		Exceeds Significance Threshold?
	Maximum Lifetime Proposed Project Risk	Significance Threshold	
Maximum Impacted Sensitive Receptor – Infant to Adult (30 years)	0.85	10	No
Maximum Impacted Sensitive Receptor – Adult	0.02	10	No
Maximum Impacted Worker Receptor	0.27	10	No
Receptor	Chronic Non-Cancer Hazard Index		Exceeds Significance Threshold?
	Maximum Lifetime Proposed Project Risk	Significance Threshold	
Maximum Impacted Sensitive Receptor – Infant to Adult (30 years)	<0.01	1.0	No
Maximum Impacted Sensitive Receptor – Adult	<0.01	1.0	No
Maximum Impacted Worker Receptor	0.02	1.0	No

Source: Health Risk Assessment (Appendix C).

Project Construction Truck Emission Sources

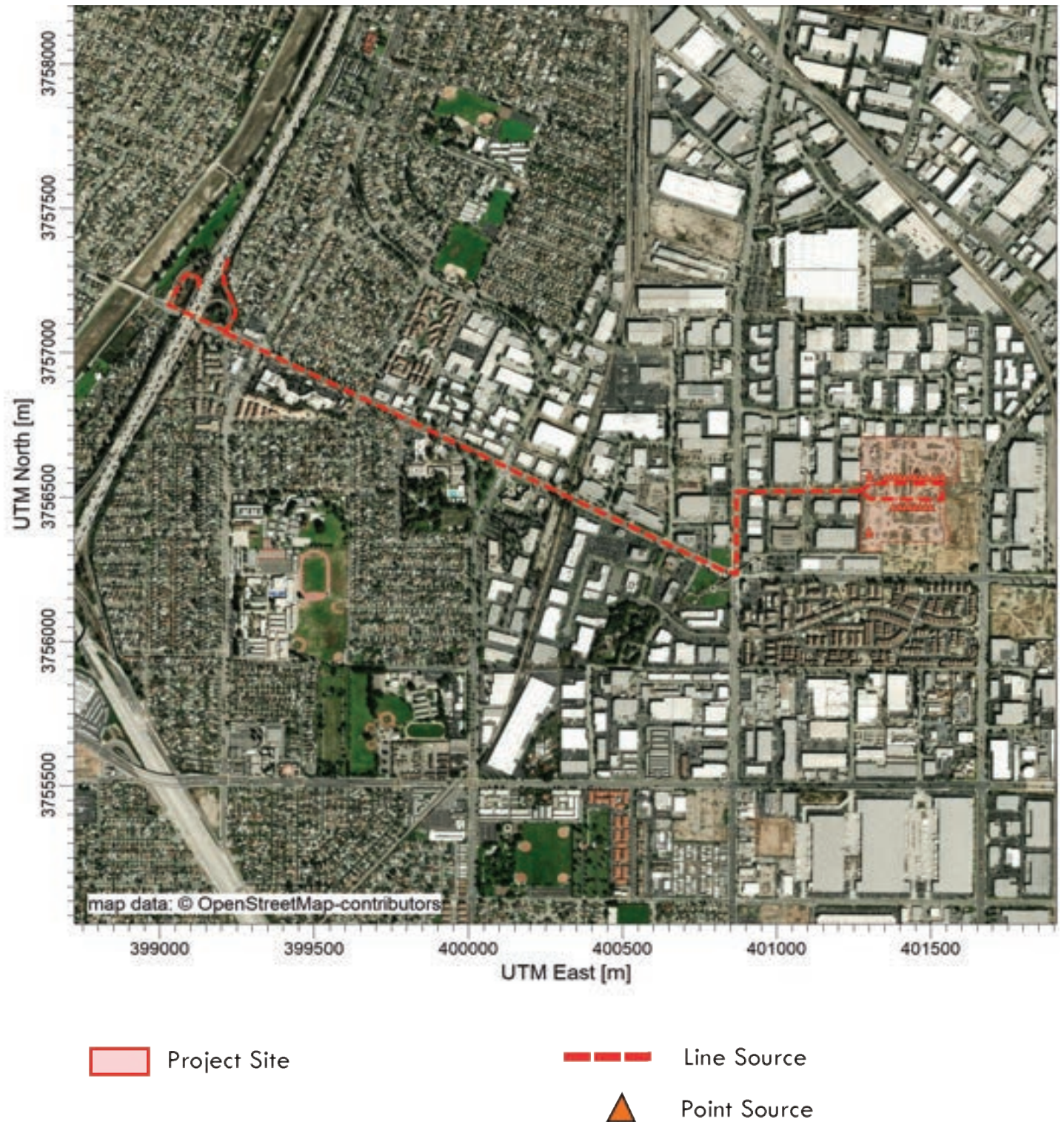


 Project Site

 Line Source

This page intentionally left blank.

Project Operational Emission Sources



This page intentionally left blank.

Operational Impacts

The land use with the greatest potential exposure to Project construction-source DPM emissions is a residential apartment community that is 357 feet (109 meters) south of the Project site boundary, while the nearest worker receptor was located at a manufacturing building 1.91 meters (6 feet) to the east of the Project boundary. As shown in Table 5.1-15, the MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.49 in one million, which is less than the SCAQMD significance threshold of 10 in one million. The non-cancer risks were estimated to be 0.12, which would not exceed the applicable significance threshold of 1.0. All other receptors would experience lower concentrations of DPM and thus less risk during operation of the proposed Project than the MEIR identified herein. As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project operational activity. Impacts would be less than significant.

Table 5.1-15: Summary of Operational Cancer and Non-Cancer Risks

Receptor	Cancer Risk (per million)		Exceeds Significance Threshold?
	Maximum Lifetime Proposed Project Risk	Significance Threshold	
Maximum Impacted Sensitive Receptor – Infant to Adult (30 years)	2.49	10	No
Maximum Impacted Sensitive Receptor – Child	1.77	10	No
Maximum Impacted Sensitive Receptor – Adult	0.32	10	No
Maximum Impacted Worker Receptor	0.58	10	No
Receptor	Chronic Non-Cancer Hazard Index		Exceeds Significance Threshold?
	Maximum Lifetime Proposed Project Risk	Significance Threshold	
Maximum Impacted Sensitive Receptor – Infant to Adult (30 years)	<0.01	1.0	No
Maximum Impacted Sensitive Receptor – Child	<0.01	1.0	No
Maximum Impacted Sensitive Receptor – Adult	<0.01	1.0	No
Maximum Impacted Worker Receptor	0.12	1.0	No

Source: Health Risk Assessment (Appendix C).

School Child Exposure

A one-quarter mile radius, or 1,320 feet, is commonly utilized for identifying sensitive receptors, such as schools, that may be impacted by a proposed project. This radius is more robust than, and therefore provides a more health protective scenario for evaluation than the 1,000-foot impact radius identified above.

There are no schools within one-quarter mile of the Project site. The nearest schools are Rancho Santa Gertrudes Elementary School, located at 11233 Charlesworth Road, approximately 1.2 miles from the Project site; and Jersey Avenue Elementary School, located at 9400 Jersey Ave, approximately 1.4 miles from the Project site. Because there is no reasonable potential that TAC emissions would cause significant health impacts at distances of more than ¼ mile from the air pollution source, there would be no significant impacts that would occur to any schools in the vicinity of the Project.

Combined Construction and Operational Impacts

Table 5.1-16 shows that at the MEIR, the maximum incremental cancer risk attributable to Project construction-source and operational-source DPM emissions is estimated at 2.68 in one million, which is less than the threshold of 10 in one million. As such, the Project would not cause a significant human health or cancer risk to nearby residences or workers, and impacts would be less than significant.

Table 5.1-16: Summary of Construction and Operational Cancer and Non-Cancer Risks

Receptor	Cancer Risk (per million)		Exceeds Significance Threshold?
	Maximum Lifetime Proposed Project Risk	Significance Threshold	
Maximum Impacted Sensitive Receptor – Infant to Adult (30 years)	2.68	10	No
Maximum Impacted Worker Receptor	1.00	10	No

Source: Health Risk Assessment (Appendix C).

As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction and operational activity combined. All other receptors during construction activity would experience less risk than what is identified for this location. As such, construction of the Project would not cause a significant human health or cancer risk to nearby residences and workers and impacts would be less than significant.

IMPACT AQ-4: THE PROJECT WOULD NOT RESULT IN OTHER EMISSIONS (SUCH AS THOSE LEADING TO ODORS) ADVERSELY AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE.

Less Than Significant Impact. The proposed Project would not emit other emissions, such as those generating objectionable odors, that would affect a substantial number of people. The threshold for odor is identified by SCAQMD Rule 402, *Nuisance*, which states:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

The type of facilities that are considered to result in other emissions, such as objectionable odors, include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities.

The proposed Project would implement industrial development within the Project site. This land use does not involve the types of uses that would emit objectionable odors affecting a substantial number of people. Odors generated by industrial land uses are generated from uses such as manufacturing facilities, paint/coating operations, refineries, chemical manufacturing, and food manufacturing facilities. At the current time, the specific tenants and uses of the proposed industrial building are unknown. However, new tenants for these types of uses would be required to be reviewed through the City's permitting process. If potential concerns related to odors are identified for future building uses, the City would require appropriate hazardous materials permitting (as detailed in Section 5.5, *Hazards and Hazardous Materials*) and odor minimization plans or features would be required in compliance with SCAQMD Rule 402, included as PPP AQ-4, which would prevent nuisance odors.

During construction, emissions from construction equipment, architectural coatings, and paving activities may generate odors. However, these odors would be temporary, intermittent in nature, and would not affect a substantial number of people. The noxious odors would be confined to the immediate vicinity of the construction equipment. Also, the short-term construction-related odors would cease upon the drying or hardening of the odor-producing materials.

In addition, all Project-generated solid waste would be stored in covered containers and removed at regular intervals in compliance with solid waste regulations and would not generate objectionable odors. Therefore, impacts associated with other operation- and construction-generated emissions, such as odors, would be less than significant.

5.1.7 CUMULATIVE IMPACTS

The geographic area for analysis of cumulative air quality impacts is the Basin.

The SCAQMD 2022 AQMP evaluates regional conditions within the Basin and sets regional emission significance thresholds for both construction and operation of development projects that apply to project-specific impacts and cumulatively-considerable impacts. Therefore, per SCAQMD's methodology, if an individual project would result in air emissions of criteria pollutants that exceeds the SCAQMD's thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants.

As described in Impact AQ-2 above, emissions from construction would be below regional and localized thresholds for pollutants with implementation of Mitigation Measure AQ-1. Emissions from Project operation would not exceed SCAQMD's thresholds for any criteria pollutant at the regional or local level after implementation of existing regulations. Therefore, construction and operational emissions would not be cumulatively considerable and would be less than significant.

As discussed in Impact AQ-3, the Project would not cause significant localized emissions impact to adjacent land uses as a result of Project construction or operation activity. Therefore, impacts related to localized emissions would not be cumulatively considerable and would be less than significant.

Regarding DPM emissions, SCAQMD has applied a 1,000-foot distance from a proposed project to identify other development projects that could contribute to cumulative impacts with the proposed project. The search radius for this Project was extended to 0.25 mile (1,320 feet) to identify potential cumulative sources. Within the 0.25-mile radius around the Project, there is one concurrent industrial development project abutting the Project's south and eastern boundary, sharing the Northwest corner of Telegraph Road and Santa Fe Springs Road. This cumulative project includes four warehouse buildings that would total 318,121 SF and has been approved but has not yet begun construction. A second model run was completed adding the cumulative project in combination with the operational emissions from the Proposed Project.

Table 5.1-17 shows that the Project has a cumulative operational cancer risk impact of 3.00 in one million that is below the threshold of 10 in one million and a non-cancer risk maximum HI of <0.01 that is below the threshold of 1. Also, Table 5.1-18 shows that the combination of Project construction and cumulative operational cancer risks would be 2.97 in one million, which is below the threshold of 10 in one million. Therefore, the Project would result in a less-than-significant cumulative impact.

Table 5.1-17: Cumulative Operational Cancer and Non-Cancer Risks

Receptor	Cancer Risk (per million)		Exceeds Significance Threshold?
	Maximum Lifetime Proposed Project Risk	Significance Threshold	
Maximum Impacted Sensitive Receptor – Infant to Adult (30 years)	3.00	10	No
Maximum Impacted Sensitive Receptor – Child	2.13	10	No
Maximum Impacted Sensitive Receptor – Adult	0.46	10	No
Maximum Impacted Worker Receptor	0.47	10	No
Receptor	Chronic Non-Cancer Hazard Index		Exceeds Significance Threshold?
	Maximum Lifetime Proposed Project Risk	Significance Threshold	
Maximum Impacted Sensitive Receptor – Infant to Adult (30 years)	<0.01	1.0	No
Maximum Impacted Sensitive Receptor – Child	<0.01	1.0	No
Maximum Impacted Sensitive Receptor – Adult	<0.01	1.0	No
Maximum Impacted Worker Receptor	0.10	1.0	No

Source: Health Risk Assessment (Appendix C).

Table 5.1-18: Combined Project Construction and Cumulative Operational Health Risk

Receptor	Cancer Risk (per million)		Exceeds Significance Threshold?
	Maximum Lifetime Proposed Project Risk	Significance Threshold	
Maximum Impacted Sensitive Receptor – Infant to Adult (30 years)	2.95	10	No
Maximum Impacted Worker Receptor	1.00	10	No

Source: Health Risk Assessment (Appendix C).

As discussed under Impact AQ-4, the Project would not expose surrounding uses to objectionable odors. Thus, there is no potential for odors from the Project to combine with odors from surrounding development Projects and expose nearby sensitive receptors to offensive odors. Therefore, the Project would not result in significant cumulative impacts related to odors.

5.1.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES.

Existing Regulations

State

- Airborne Toxic Control Measure to Limit Diesel-Fuel Commercial Vehicle Idling (13 CCR 2485)
- In-Use Off-Road Diesel Idling Restriction (13 CCR 2449)
- California Green Building Standards Code (Code of Regulations, Title 24 Part 6)

Regional

- SCAQMD Rule 201: Permit to Construct
- SCAQMD Rule 402: Nuisance Odors
- SCAQMD Rule 403: Fugitive Dust
- SCAQMD Rule 1108: Volatile Organic Compounds
- SCAQMD Rule 1113: Architectural Coatings
- SCAQMD Rule 1143: Paint Thinners and Solvents
- SCAQMD Rule 1186: Street Sweeping
- SCAQMD Rule 1403: Asbestos Emissions from Demolition/Renovation Activities
- SCAQMD Rule 2305: Warehouse Indirect Source Rule

Plans, Programs, or Policies

These actions will be included in the Project's mitigation monitoring and reporting program (MMRP):

PPP AQ-1: Rule 403. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 403, which includes the following:

- All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions.
- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the project are watered, with complete coverage of disturbed areas, at least 3 times daily during dry weather; preferably in the mid-morning, afternoon, and after work is done for the day.
- The contractor shall ensure that traffic speeds on unpaved roads and project site areas are reduced to 15 miles per hour or less.

PPP AQ-2: Rule 1113. The Project is required to comply with the provisions of South Coast Air Quality Management District Rule (SCAQMD) Rule 1113. Only "Low-Volatile Organic Compounds" paints (no more than 50 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications shall be used.

PPP AQ-3: Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines. The Project is required to obtain a permit from SCAQMD for the proposed diesel fire pump and would be required to comply with Rule 1470, regulating the use of diesel-fueled internal combustion engines.

PPP AQ-4: Rule 402. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 402. The Project shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

5.1.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, the following impacts would be **potentially significant**:

- **Impact AQ-1:** The proposed Project would generate air quality emissions that could conflict with or obstruct implementation of the applicable air quality plan.

- **Impact AQ-2:** The proposed Project could result in a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

Without mitigation the following impacts would be **less than significant**:

- **Impact AQ-3:** The proposed Project would not expose sensitive receptors to substantial pollutant concentrations.
- **Impact AQ-4:** The proposed Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

5.1.10 MITIGATION MEASURES

Mitigation Measure AQ-1: Low ROG/VOC Paint (Construction). Construction plans, specifications, and permitting shall require that during construction, the Project shall use “super-compliant” low volatile organic compound (VOC)/reactive organic gases (ROG) paints which have been reformulated to exceed the regulatory VOC limits (i.e., have a lower ROG/VOC content than what is required) put forth by SCAQMD’s Rule 1113 for all architectural coatings. Super-compliant low ROG/VOC paints shall contain no more than 50g/L of ROG/VOC. Prior to issuance of building permits, the City of Santa Fe Springs shall confirm that plans include the following specifications:

- All architectural coatings will be super-compliant low ROG/VOC paints, reduced from the industrial standard of 100 g/L VOC content paint, to a compliant VOC, not exceeding 50 g/L.
- Recycle leftover paint. Take any leftover paint to a household hazardous waste center; do not mix leftover water-based and oil-based paints.
- Keep lids closed on all paint containers when not in use to prevent VOC emissions and excessive odors.
- For water-based paints, clean up with water only. Whenever possible, do not rinse the cleanup water down the drain or pour it directly into the ground or the storm drain. Set aside the can of cleanup water and take it to the hazardous waste center (Public Works Los Angeles County, 2018).
- Use compliant low-VOC cleaning solvents to clean paint application equipment.

5.1.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of mitigation, Impacts AQ-1, AQ-2, AQ-3, and AQ-4 would be less than significant.

5.1.12 REFERENCES

City of Santa Fe Springs. (2021). *Santa Fe Springs 2040 General Plan*. Retrieved from City of Santa Fe Springs: <https://www.reimaginesantafesprings.org/documents#GP>

EPD Solutions, Inc. (2024). *Northwest Corner Telegraph Road and Santa Fe Springs Road Air Quality, Energy, and GHG Impact Analysis*. **Appendix B**.

EPD Solutions, Inc. (2024). *Northwest Corner Telegraph Road and Santa Fe Springs Road Health Risk Assessment*. **Appendix C**.

South Coast Air Quality Management District. (2016). *Rule 1113 Architectural Coatings*. Retrieved June 6, 2024, from <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

South Coast Air Quality Management District. (n.d.) *RULE 1186. PM10 Emissions From Paved and Unpaved Roads, and Livestock Operations*. <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1186.pdf>

South Coast Air Quality Management District. (2005). *Rule 403 Fugitive Dust*. Retrieved June 6, 2024, from <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>

This page intentionally left blank.

5.2 Energy

5.2.1 INTRODUCTION

This section of the Draft EIR assesses the significance of the use of energy, including electricity, natural gas, gasoline, and diesel fuels, that would result from implementation of the proposed Project. It discusses existing energy use patterns and examines whether the proposed Project (including development and operation) would result in the consumption of large amounts of fuel or energy or use such resources in a wasteful manner.

The analysis in this section is based, in part, on the following documents and resources:

- *Santa Fe Springs General Plan 2040*, adopted in 2022.
- *Santa Fe Springs General Plan and Targeted Zoning Code Update Environmental Impact Report*, prepared by MIG, Inc, 2021.
- City of Santa Fe Springs Code of Ordinances.

Refer to Section 5.4, *Greenhouse Gas Emissions*, for a discussion of the relationship between energy consumption and greenhouse gas (GHG) emissions, and Section 5.11, *Utilities and Service Systems*, for a discussion of water consumption. This analysis is based on the *Air Quality, Greenhouse Gas, and Energy Impact Analysis* for the Project, included as Appendix B.

5.2.2 REGULATORY SETTING

5.2.2.1 Federal Regulations

Energy Independence and Security Act, Corporate Average Fuel Efficiency Standards

On December 19, 2007, the Energy Independence and Security Act of 2007 was signed into law, requiring an increased Corporate Average Fuel Economy (CAFE) standard of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by the 2020 model year.

In addition to setting increased CAFE standards for motor vehicles, the Energy Independence and Security Act includes the following additional provisions:

- Renewable Fuel Standard (RFS) (Section 202)
- Appliance and Lighting Efficiency Standards (Sections 301–325)
- Building Energy Efficiency (Sections 411–441)

Additional provisions of the Act address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of green jobs.

Energy Policy Act of 2005

The Energy Policy Act of 2005 seeks to reduce reliance on non-renewable energy resources and provide incentives to reduce current demand on these resources. For example, under this Act, consumers and businesses can obtain federal tax credits for purchasing fuel-efficient appliances and products (including hybrid vehicles), building energy-efficient buildings, and improving the energy efficiency of commercial buildings. Additionally, tax credits are available for the installation of qualified fuel cells, stationary microturbine power plants, and solar power equipment.

Corporate Average Fuel Economy Standards

On March 31, 2022, the National Highway Traffic Safety Administration (NHTSA) finalized the Corporate Average Fuel Economy (CAFE) standards for model years 2024–2026 of passenger cars and light trucks. The amended CAFE standards would require an industry wide fleet average of approximately 49 mpg for passenger cars and light trucks in model year 2026, by increasing fuel efficiency by 8 percent annually for model years 2024–2025, and 10 percent annually for model year 2026. The final standards are estimated to save about 234 billion gallons of gas between model years 2030 to 2050.

5.2.2.2 State Regulations

California Code of Regulations (CCR) Title 13, Motor Vehicles, Section 2449(d)(3)

No vehicle or engines subject to this regulation may idle for more than 5 consecutive minutes. The idling limit does not apply to:

- Idling when queuing;
- Idling to verify that the vehicle is in safe operating condition;
- Idling for testing, servicing, repairing, or diagnostic purposes;
- Idling necessary to accomplish work for which the vehicle was designed (such as operating a crane);
- Idling required to bring the machine system to operating temperature; or
- Idling necessary to ensure safe operation of the vehicle.

Title 24 Building Energy Efficiency Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24 was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption.

The 2022 Energy Code encourages efficient electric heat pumps, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards, among other requirements. The California Energy Commission anticipates that the 2022 Energy Code will reduce GHG emissions by 10 million metric tons.

CALGreen is updated on a regular basis. The 2022 CALGreen standards that reduce GHG emissions and are applicable to the proposed Project include, but are not limited to, the following:

- **Short-term bicycle parking.** If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- **Long-term bicycle parking.** For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- **Designated parking for clean air vehicles.** In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).
- **EV charging stations.** New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106. 5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the

installation of raceway conduit and panel power requirements for medium- and heavy-duty electric vehicle supply equipment for warehouses, grocery stores, and retail stores.

- **Outdoor light pollution reduction.** Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8).
- **Construction waste management.** Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1, 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- **Excavated soil and land clearing debris.** 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reuse or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- **Recycling by Occupants.** Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- **Water conserving plumbing fixtures and fittings.** Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
 - **Water Closets.** The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
 - **Urinals.** The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
 - **Showerheads.** Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
 - **Faucets and fountains.** Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- **Outdoor potable water uses in landscaped areas.** Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent (5.304.1).
- **Water meters.** Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 SF or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).
- **Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 SF.** Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 SF requiring a building or landscape permit (5.304.3).
- **Commissioning.** For new buildings 10,000 SF and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

5.2.2.3 Local and Regional Regulations

City of Santa Fe Springs General Plan

The City of Santa Fe Springs General Plan contains the following policies related to energy and energy consumption that are applicable to the proposed Project:

- Policy LU-3.8 Green Industrial Operations.** Encourage industrial businesses to utilize green building strategies, green vehicle fleets, energy-efficient equipment, and support renewable energy systems.
- Policy COS-8.1 Efficiency of Existing Buildings.** Improve energy efficiency of existing and new buildings, such as adding energy efficient appliances and fixtures, improvements to windows, reflective shingles, roof and wall insulations, and other green building strategies.
- Policy COS-8.3 Energy Efficiency Strategies.** Encourage energy-efficiency strategies of all new projects (public and private), including appropriate structure orientation and site design, passive solar approaches, the use of shade trees to maximize cooling, and to reduce fossil fuel consumption for heating and cooling.
- Policy COS-8.4 Renewable Energy Industrial Facilities.** Promote the use of renewable energy and/or solar energy for large industrial operations on building rooftops or on large properties and support solar-ready buildings for large industrial building and warehouses.
- Policy EJ-1.2 Truck Idling Restrictions.** Designate acceptable and unacceptable areas for freight trucking and diesel truck idling to limit impacts on disadvantaged communities already overburdened by air pollution.
- Policy S-5.7 Passive Solar Design.** Encourage passive solar design for new development and community facilities, including cool roofs, architectural features that cool interiors, shade shelter areas, shaded playgrounds, and bus shelters canopies.

The City currently does not have an adopted Climate Action Plan. However, the City's General Plan Conservation Element includes the previously listed energy efficiency policies that are applicable to the proposed Project.

5.2.3 ENVIRONMENTAL SETTING

5.2.3.1 Electricity

The Southern California Edison Company (SCE) is the electrical purveyor in the City of Santa Fe Springs. SCE provides electricity service to more than 14 million people in a 50,000-square-mile area of central, coastal, and Southern California. According to the California Energy Commission (CEC), total electricity consumption in the SCE service area in 2021 was 103,045 GWh (36,375 GWh for the residential sector and 51,057 GWh for the non-residential sector). Total electricity consumption in Los Angeles County in 2021 was 65,374.7 GWh (65,374,721,369 kilowatt-hours (kWh) (California Energy Commission, 2022).

California utilities are experiencing increasing demands that require modernization of the electric distribution grid to, among other things, accommodate two-way flows of electricity and increase the grid's capacity. SCE is in the process of implementing infrastructure upgrades to ensure the ability to meet future demands. In addition, as described by the Edison International 2023 Annual Report, the SCE electrical grid modernization effort supports implementation of California Senate Bill 32 that requires the State to cut GHG emissions 40

percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050 in order to help achieve carbon neutrality by 2045. It describes that in 2023, approximately 49 percent of power that SCE delivered to customers came from carbon-free resources (Edison International, Southern California Edison, 2023).

Existing electrical utilities near the Project site exist near the northern property line.

5.2.3.2 Natural Gas

The Southern California Gas Company (SoCalGas) is the natural gas service provider for the Project site. SoCalGas provides natural gas to approximately 21.8 million people in a 24,000-square-mile service area throughout Central and Southern California, from Visalia to the Mexican border. According to the California Energy Commission (CEC), total natural gas consumption in the SoCalGas service area in 2021 was 6,755 million therms (2,308 million therms for the residential sector). Total natural gas consumption in Los Angeles County in 2021 was 2,880 million therms (2,880,994,891 therms) (California Energy Commission, 2022).

Natural gas lines near the Project site exist within Hawkins Street, west of the Project site. The proposed Project does not include connections to natural gas, and natural gas would not be used in operations of the proposed Project. However, natural gas was included in the modeling for the Air Quality, GHG, and Energy Impact Analysis (Appendix B). Therefore, this section provides a conservative analysis.

5.2.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- ENE-1 Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
- ENE-2 Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

5.2.5 METHODOLOGY

A number of factors are considered when weighing whether a project would use a disproportionately large amount of energy or whether the use of energy would be wasteful in comparison to other projects. Factors such as the use of onsite renewable energy features, energy conservation features or programs, and relative use of transit are considered.

According to Appendix F of the CEQA Guidelines, conserving energy is defined as decreasing overall per capita energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. Neither Appendix F of the CEQA Guidelines nor Public Resources Code Section 21100(b)(3) offer a numerical threshold of significance that might be used to evaluate the potential significance of energy consumption of a project. Rather, the emphasis is on reducing “the wasteful, inefficient, and unnecessary consumption of energy.”

Construction activities would result in wasteful, inefficient, or unnecessary use of energy if construction equipment is old or not well maintained, if equipment is left to idle when not in use, if travel routes are not planned to minimize vehicle miles traveled, or if excess lighting or water is used during construction activities. Energy usage during project operation would be considered wasteful, inefficient, and unnecessary if the project were to violate federal, State, and/or local energy standards, including Title 24 of the California Code of Regulations, inhibit pedestrian or bicycle mobility, inhibit access to transit, or inhibit feasible opportunities to use alternative energy sources, such as solar energy, or otherwise inhibit the conservation of energy.

This energy analysis is based on CalEEMod modeling using the California Emissions Estimator Model (CalEEMod), which quantifies estimated energy use for project operations. Fuel consumption (diesel fuel and gasoline) from vehicle trips during operation was estimated for the opening year (2025) of the proposed Project based on trip estimates from the CalEEMod model and fuel efficiencies from the CARB Emission FACtor (EMFAC2021) model. Estimates of fuel consumption (diesel fuel and gasoline) from construction trucks and construction worker vehicles were based on trip estimates from the CalEEMod model and fuel efficiencies from the ARB EMFAC2021 model.

This analysis focuses on the sources of energy that are relevant to the proposed Project: electricity, natural gas¹, the equipment fuel necessary for Project construction, and vehicle fuel necessary for Project operations. For the purposes of this analysis, the amount of electricity, construction fuel, and fuel use from operations are quantified and compared to that consumed from similar land uses in Los Angeles County. The electricity use of the proposed Project is analyzed as a whole on an annual basis. Electricity use was estimated for the Project using default energy intensities by land use type in CalEEMod.

5.2.6 ENVIRONMENTAL IMPACTS

IMPACT ENE-1: THE PROJECT WOULD NOT RESULT IN POTENTIALLY SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY RESOURCES, DURING PROJECT CONSTRUCTION OR OPERATION.

Less than Significant Impact.

Construction

Construction of the proposed Project would occur over approximately 18 months and would consume energy in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment, construction worker travel to and from the Project site, and delivery truck trips;
2. Electricity associated with providing temporary power for lighting and electric equipment; and
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction of the proposed Project would not involve consumption of natural gas because the construction-related equipment would not be powered by natural gas.

Construction activities related to the proposed Project and the associated infrastructure are not expected to result in demand for fuel greater on a per-unit-of-development basis than other development projects in Southern California. Also, CCR Title 13, *Motor Vehicles*, Section 2449(d)(3), *Idling*, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. The energy analysis modeling for the proposed Project (included as Appendix B) shows that construction-related use of construction vehicles and off-road equipment would utilize approximately 132,422 gallons of diesel fuel and 35,613 gallons of gasoline, as detailed in Table 5.2-1, *Construction Fuel Consumption*.

¹ The proposed Project would not connect to natural gas. Therefore, the energy modeling provides a conservative analysis.

Table 5.2-1: Construction Fuel Consumption

Construction Source	Gallons of Diesel Fuel	Gallons of Gasoline Fuel
Construction Vehicles	70,932	35,613
Off-Road Construction Equipment	61,490	0
Total	132,422	35,613

Source: Air Quality, Greenhouse Gas, and Energy Impact Analysis (Appendix B).

Construction contractors are required to demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. In addition, compliance with existing CARB idling restrictions and the use of newer engines and equipment would reduce fuel combustion and energy consumption.

Overall, construction activities would require limited energy consumption, would comply with all existing regulations, and would therefore not be expected to use large amounts of energy or fuel in a wasteful manner. Thus, impacts related to construction energy usage would be less than significant.

Operation

Once operational, the Project building would generate demand for electricity, natural gas², and petroleum (gasoline and diesel) for motor vehicle trips. Operational use of energy includes the fuel used for vehicle trips associated with the Project, heating, cooling, and lighting of buildings, water heating, operation of electrical systems and plug-in appliances within buildings, parking lot and outdoor lighting, and the transport of electricity and water to areas where they would be consumed. The proposed Project includes the operation of two emergency generators and two fire pumps, that are assumed to operate for one hour per day for a total of 50 hours per year. In addition, 58 forklifts are assumed, inclusive of 29 compressed natural gas (CNG) and 29 electric forklifts. This use of energy is typical for urban development, and no operational activities or land uses would occur that would result in extraordinary energy consumption.

As detailed in Table 5.2-2, *Annual Operational Energy Consumption*, operation of the Project is estimated to annually use 117,414 gallons of gasoline and 579,305 gallons of diesel fuel. The amount of operational fuel use was estimated using CARB's EMFAC2021 model. In addition, the proposed Project is estimated to annually use 129.73 therms of natural gas. Total natural gas consumption in Los Angeles County in 2021 was 2,880 million therms (2,880,994,891 therms). Therefore, operation of the proposed Project would increase the annual natural gas consumption in Los Angeles County by approximately 0.000005 percent. As shown in Table 5.5-2, the estimated electricity demand associated with the operation of the proposed Project is 4,588,249 kWh per year. Total electricity consumption in Los Angeles County in 2021 was 65,374.7 GWh (65,374,721,369 kWh). Therefore, operation of the proposed Project would increase the annual electricity consumption in Los Angeles County by approximately 0.007 percent.

Overall, the Project's estimate fuel and energy use is typical for urban development. As such, no operational activities or land uses would occur that would result in extraordinary energy consumption. Additionally, through City permitting, assurance would be provided that existing regulations related to energy efficiency and consumption, such as Title 24 regulations and CCR Title 13, *Motor Vehicles*, Section 2449(d)(3) related to idling, would be implemented. The Project would not preclude renewable energy use because buildings would be solar ready in compliance with current Title 24 requirements, which would allow for the future

² The proposed Project would not connect to natural gas. Therefore, the air quality modeling provides a conservative analysis.

installation of rooftop solar. Therefore, the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during operation.

Table 5.2-2: Annual Operational Energy Consumption

Energy Type	Annual Energy Consumption
Electricity Consumption (kWh/year)	4,588,249
Natural Gas Consumption (therms/year) ¹	129.73
Petroleum – Gasoline (gallons/year)	117,414
Petroleum – Diesel Fuel (gallons/year)	579,305

kWh = kilowatt-hours; ¹The proposed Project would not connect to natural gas. Therefore, the Energy modeling provides a conservative analysis.

Source: Air Quality, Greenhouse Gas, and Energy Impact Analysis (Appendix B).

IMPACT ENE-2: THE PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT A STATE OR LOCAL PLAN FOR RENEWABLE ENERGY OR ENERGY EFFICIENCY.

Less than Significant Impact. As described previously, the proposed Project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of the proposed Project. Typical Title 24 measures include insulation, use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC), solar-reflective roofing materials, energy-efficient indoor and outdoor lighting systems, reclamation of heat rejection from refrigeration equipment to generate hot water, and incorporation of skylights. The City's administration of the CCR Title 24 requirements includes review of design components and energy conservation measures and occurs during the permitting process, which ensures that all requirements are met. In addition, Project design and operation would comply with State Building Energy Efficiency Standards, appliance efficiency regulations, and green building standards. The Project buildings would be solar ready in compliance with current Title 24 requirements, which would allow for the future installation of rooftop solar. As a result, the proposed Project would not conflict with or obstruct with CCR Title 24 energy efficiency standards.

CEC Integrated Energy Policy Report

The CEC's 2021 *Integrated Energy Policy Report* and 2022 *Integrated Energy Policy Report Update* provide the results of the CEC's assessments of a variety of energy issues facing California. Energy usage on the Project site during construction would be temporary in nature and consistent with typical construction energy demands in Los Angeles County. Because California's energy conservation planning actions are conducted at a regional level, and because the proposed Project's total impact on regional energy supplies would be minor, the proposed Project would not conflict with or obstruct California's energy conservation plans as described in the CEC's *Integrated Energy Policy Report*. Overall, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Santa Fe Springs General Plan

The City currently does not have an adopted Climate Action Plan. However, the City's General Plan Conservation Element includes energy efficiency policies that are applicable to the proposed Project. As shown in Table 5.2-3 below, the proposed Project would be consistent with the General Plan Conservation Element policies related to energy and energy consumption that are applicable to the Project.

Table 5.2-3: Consistency with City of Relevant General Plan Policies

Policy	Project Consistency
Policy LU-3.8 Green Industrial Operations. Encourage industrial businesses to utilize green building strategies, green vehicle fleets, energy-efficient equipment, and support renewable energy systems.	Consistent. As previously discussed, the proposed Project would meet typical CCR Title 24 energy efficiency standards that include: insulation, use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC), solar-reflective roofing materials, energy-efficient indoor and outdoor lighting systems, reclamation of heat rejection from refrigeration equipment to generate hot water, and incorporation of skylights.
Policy COS-8.1: Efficiency of Existing Buildings. Improve energy efficiency of existing and new buildings, such as adding energy efficient appliances and fixtures, improvements to windows, reflective shingles, roof and wall insulations, and other green building strategies.	Consistent. As previously discussed, the proposed Project would comply with existing CCR Title 24 Part 6. Title 24 measures include: insulation, use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC), solar-reflective roofing materials, energy-efficient indoor and outdoor lighting systems, reclamation of heat rejection from refrigeration equipment to generate hot water, and incorporation of skylights. Assurance would be provided during the City permitting process that existing regulations related to energy efficiency and consumption, such as Title 24 regulations, would be implemented by the proposed Project.
Policy COS-8.3: Energy Efficiency Strategies. Encourage energy-efficient strategies of all new projects (public and private), including appropriate structure orientation and site design, passive solar approaches, the use of shade trees to maximize cooling, and to reduce fossil fuel consumption for heating and cooling.	Consistent. As described above, the proposed Project would comply with existing CCR Title 24 Part 6. Title 24 measures include: insulation, use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC), solar-reflective roofing materials, energy-efficient indoor and outdoor lighting systems, reclamation of heat rejection from refrigeration equipment to generate hot water, and incorporation of skylights. Furthermore, as discussed in Section 3.0, <i>Project Description</i> , Landscape consisting of 24-inch and 36-inch box trees would be installed around the perimeter of the Project site, and throughout the parking areas. Lastly, the proposed Project would be solar ready for future installation of solar panels. The City would verify, during the permitting process, that the proposed Project would adhere to these energy-efficiency strategies.
Policy COS-8.4: Renewable Energy Industrial Facilities. Promote the use of renewable energy and/or solar energy for large industrial operations on building rooftops or on large properties and support solar-ready buildings for large industrial buildings and warehouses.	Consistent. As previously described, the proposed buildings would be solar ready in compliance with current Title 24 requirements, which would allow for the future installation of rooftop solar. The City would verify, during the permitting process, that the proposed Project is consistent with Title 24 requirements.
Policy EJ-1.2 Truck Idling Restrictions. Designate acceptable and unacceptable areas for freight trucking and diesel truck idling to limit impacts on disadvantaged communities already overburdened by air pollution.	Consistent. As previously discussed, the proposed Project would be required to comply with CCR Title 13, <i>Motor Vehicles</i> , Section 2449(d)(3) which limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment.
Policy S-5.7 Passive Solar Design. Encourage passive solar design for new development and community facilities, including cool roofs, architectural features that cool interiors, shade shelter areas, shaded playgrounds, and bus shelters canopies.	Consistent. As previously discussed, the proposed Project would be solar ready in compliance with current Title 24 requirements, which would allow for the future installation of rooftop solar. The City would verify, during the permitting process, that the proposed Project is consistent with Title 24 requirements.

Source: (Santa Fe Springs, 2022)

5.2.7 CUMULATIVE IMPACTS

The geographic context for analysis of cumulative impacts regarding energy includes past, present, and future development within the County of Los Angeles. All development projects throughout the County would be required to comply with the energy efficiency standards in the Title 24 requirements. Additionally, some of the developments could provide for additional reductions in energy consumption by use of solar panels, sky lights, or other LEED-type energy efficiency infrastructure. With implementation of the existing energy conservation regulations, the electricity and fuel consumption from the proposed Project would not be cumulatively wasteful, inefficient, or unnecessary.

Petroleum consumption associated with the proposed Project and cumulative development projects would be primarily attributable to transportation, especially vehicular and truck use. However, State fuel efficiency standards and alternative fuels policies (per AB 1007 Pavely (2005)) would contribute to a reduction in fuel use, and the federal Energy Independence and Security Act and the State's Long Term Energy Efficiency Strategic Plan would reduce reliance on non-renewable energy resources. In addition, CCR Title 13, Motor Vehicles, Section 2449(d)(3) limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. For these reasons, the consumption of petroleum would not occur in a wasteful, inefficient, or unnecessary manner and impacts would be less than cumulatively considerable.

5.2.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

The following existing standard regulations would reduce potential impacts related to energy:

- California Energy Code (Code of Regulations, Title 24 Part 6 and Part 11).
- California Code of Regulations Title 13, *Motor Vehicles*, Section 2449(d)(3), *Idling*.

5.2.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impacts ENE-1 and ENE-2 would be less than significant.

5.2.10 MITIGATION MEASURES

Impacts related to energy would be less than significant and no mitigation measures are required.

5.2.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to energy would be less than significant and no mitigation measures are required.

5.2.12 REFERENCES

California Energy Commission. (2022). *Gas Consumption by County and Entity. Energy Report*.
<http://www.ecdms.energy.ca.gov/gasbyutil.aspx>

Edison International, Southern California Edison. (2023). *2023 Annual Report*.
<https://download.edison.com/406/files/202403/2023-eix-sce-annual-report.pdf?Signature=nTvK5Bx0V%2FV%2FA6fEAa5Ngj4DwOw%3D&Expires=1723930268&A>

[WSAccessKeyId=AKIAJX7XEOELCYGIVDQ&versionId=gKDVybNV5xy6ZD4A6Mk_7Qipln4o0KPs&response-content-disposition=attachment](https://www.santafesprings.org/departments/planning_and_development_department/planning/planning_handouts_and_maps.php#outer-136)

EPD Solutions, Inc. (2023). *Air Quality, GHG, and Energy Impact Analysis*. (**Appendix B**)

Santa Fe Springs, City of. (2022). *Re-Imagine Santa Fe Springs 2040 General Plan*. Retrieved August 10, 2024, from

https://www.santafesprings.org/departments/planning_and_development_department/planning/planning_handouts_and_maps.php#outer-136

This page intentionally left blank.

5.3 Geology and Soils

5.3.1 INTRODUCTION

This section addresses potential environmental effects of the proposed Project related to paleontological resources. Other impacts related to geology and soils were analyzed in the Initial Study, included as Appendix A, and were determined to be less than significant. The analysis in this section is based, in part, on the following documents and resources:

- *Santa Fe Springs General Plan 2040*, adopted in 2022.
- *Santa Fe Springs General Plan and Targeted Zoning Code Update Environmental Impact Report*, prepared by MIG, Inc., 2021.
- *City of Santa Fe Springs Code of Ordinances*.
- *Paleontological Records Search for the Paleontological Assessment for the NWC Telegraph & Santa Fe Springs Project*, BFSA Environmental, Inc., 2024 (Appendix H).
- *Preliminary Geotechnical Evaluation*, APN 8005-0150-051, 12400 Hawkins Street, Santa Fe Springs, CA, LGC Geotechnical, 2024 (Appendix E).

5.3.2 REGULATORY SETTING

5.3.2.1 State Regulations

Public Resources Code (PRC) Section 5097.5

Requirements for paleontological resource management are included in the PRC (Public Resources Code) Division 5, Chapter 1.7, Section 5097.5, and Division 20, Chapter 3, Section 30244, which states: No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor. These statutes prohibit the removal, without permission, of any paleontological site or feature from lands under the jurisdiction of the State or any city, county, district, authority, or public corporation, or any agency thereof. As a result, local agencies are required to comply with PRC 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others. PRC Section 5097.5 also establishes the removal of paleontological resources as a misdemeanor and requires reasonable mitigation of adverse impacts to paleontological resources from developments on public (State, county, city, and district) lands.

5.3.3 ENVIRONMENTAL SETTING

5.3.3.1 Regional Setting

The City of Santa Fe Springs lies within the Peninsular Ranges Geomorphic Province, specifically within an area known as the Downey Plain, at the eastern margin of the broader Los Angeles Sedimentary Basin, a region consisting of desert plains and isolated mountain ranges (BFSA, 2024). According to the California Geological Survey, the Peninsular Ranges province is separated by northwest trending valleys, subparallel

to faults branching from the San Andreas Fault. Furthermore, the Project site lies within an oil-producing region, known as the Santa Fe Springs Oil Field.

The City of Santa Fe Springs is primarily underlain by Quaternary old alluvial fan deposits, defined as middle to late Pleistocene deposits made up of sand, loam, and clay soils. The General Plan EIR determined that geological analysis does not reveal the presence of or potential for unique geological features, and the likelihood of finding palaeontologic materials is negligible within the City (City of Santa Fe Springs, 2022).

5.3.3.2 Site Setting

The Paleontological Assessment prepared for the Project, included as Appendix H, details that the geology mapped within the Project site are Holocene to Pleistocene-aged old alluvial fan deposits described as consolidated gravel, sand, and silt. Holocene alluvium is generally considered to be geologically too young to contain significant fossils. Pleistocene alluvial and alluvial fan deposits within Los Angeles Basin often yield important Ice Age fossils and therefore have a high paleontological sensitivity.

As noted in the Geotechnical Investigation, included as Appendix E, soils encountered at the Project site consist of older alluvial deposits to a depth of approximately 51.5 feet below surface. The soils are comprised of gray to brown, dry to slightly moist, sandy silts, with lesser amounts of clay. Additionally, undocumented artificial fill comprised of silt, sand, and clay was encountered at depths of up to approximately 15 feet below ground surface. The artificial fill is most likely associated with the Project site's history of oil drilling and extraction (LGC Geotechnical, 2024).

5.3.3.3 Unique Geologic Feature

Unique geologic features refer to unique physical features or structures on the earth's crust. The Project site does not contain any unique geologic features. The Project site is currently heavily disturbed from previous and ongoing oil well activities and contains one, single-story 3,310 SF office building on the western edge of the property and a 1,282 SF canopy structure to the northeast of the building that is used to cover construction equipment; the remainder of the site consists of land that is utilized for oil and gas extraction. As described previously, the site is underlain by mid to late Pleistocene alluvial fan deposits.

5.3.3.4 Paleontological Resources

Paleontological resources are the remains of prehistoric life that have been preserved in the geologic strata. These remains are called fossils and include bones, shells, teeth, and plant remains (including their impressions, casts, and molds) in the sedimentary matrix, as well as trace fossils such as footprints and burrows. Paleontological resources are generally considered older than 5,000 years of age but may include younger remains (subfossils) when viewed in the context of local extinction of the organism or habitat (SVP, 2010).

Significant paleontological resources are defined as fossils or assemblages of fossils that are unique, unusual, rare, uncommon, or important to define a particular time frame or geologic strata, or that add to an existing body of knowledge in specific areas, in local formations, or regionally.

The paleontological records search conducted for the Project site did not identify any previously recorded fossil localities onsite or adjacent to the site. The nearest fossil locality, consisting of a Pleistocene-aged horse was identified approximately three miles southeast of the Project site. In addition, specimens of several Pleistocene-aged mammal species were identified two to three miles further southeast. Lastly, specimens of a Pleistocene-aged mammoth were identified north of those localities. As previously stated, the Project site area is classified as having Holocene to Pleistocene-aged geology. Holocene alluvial deposits are assigned

a low paleontological sensitivity due to age, while Pleistocene alluvial deposits are assigned a high paleontological sensitivity due to previous yields of Ice Age terrestrial vertebrate fossils (Appendix H).

5.3.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- GEO-1 Directly or indirectly cause 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 (refer to Division of Mines and Geology Special Publication 42);
 - ii) Strong seismic ground shaking;
 - iii) Seismic-related ground failure, including liquefaction; or
 - iv) Landslides.
- GEO-2 Result in substantial soil erosion or the loss of topsoil.
- GEO-3 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.
- GEO-4 Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.
- GEO-5 Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
- GEO-6 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The Initial Study (Appendix A) established that the proposed Project would not result in impacts related to Thresholds GEO-1 through GEO-5; therefore, no further assessment of these thresholds is required in this Draft EIR.

5.3.5 METHODOLOGY

A Paleontological Assessment was prepared to determine the proposed Project's potential impacts to paleontological resources. The analysis included a site survey and record searches of past identified resources, consideration of the types of soils that exist, and the paleontological sensitivity of those soils. The analysis combines these factors to identify the potential of the proposed construction to impact unknown paleontological resources on the site. As described in the Paleontological Assessment, a resource records search was conducted to identify any previously discovered fossil localities in or near the Project site using records from prior projects, the Los Angeles County Museum of Natural History, as well as data from published and unpublished paleontological literature (Appendix H).

5.3.6 ENVIRONMENTAL IMPACTS

IMPACT GEO-6: THE PROJECT WOULD NOT DIRECTLY OR INDIRECTLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE OR SITE OR UNIQUE GEOLOGIC FEATURE.

Less than Significant with Mitigation Incorporated. The proposed Project consists of removal of the existing building and well equipment and closure of the wells and the development of the 26.77-acre parcel with two new concrete tilt-up industrial warehouse buildings with a combined total building area of 584,678 SF and a combined total footprint of 564,678 SF. Earthmoving activities related to construction of the proposed Project, including grading and trenching activities, would extend to a depth of 15 feet below the surface. Although the site has been highly disturbed from historic and ongoing well activities, excavation could have the potential to disturb previously unknown paleontological resources. The records search completed as part of the Paleontological Assessment (Appendix H) did not reveal any previously recorded fossil localities within the Project site. However, significant fossils have been found within similar sediments in the region. As discussed above, a Pleistocene-aged horse was identified approximately three miles southeast of the Project site. Based on the presence of nearby significant fossil localities, the underlying Pleistocene age alluvial fan deposits mapped at the Project site are considered to have a high potential to yield significant paleontological resources. As such, the Project site has a high sensitivity for paleontological resources. Therefore, Mitigation Measure PAL-1 is included to require paleontological monitoring during mass grading and excavation activities of undisturbed alluvial deposits starting at five feet below the surface by a qualified paleontologist to identify, salvage, and recover any potential paleontological resources, such as significant fossil remains. With implementation of Mitigation Measure PAL-1, potential impacts to paleontological resources would be less than significant.

5.3.7 CUMULATIVE IMPACTS

Paleontological Resources: The geographic area of potential cumulative impacts related to paleontological resources includes areas that are underlain by similar geologic units from the same time period. A cumulative impact could occur if development projects incrementally result in the loss of the same types of unique paleontological resources. The City of Santa Fe Springs does not identify the City as a sensitive area for paleontological resources, and therefore did not outline any goals, policies, or implementation programs relative to paleontological resources (BFSA, 2024). However, as detailed previously, the Project site is underlain by Pleistocene old alluvial with a high potential to yield significant paleontological resources, based on the presence of nearby significant fossil localities. Thus, the Project site in conjunction with the cumulative projects listed Section 5.0, *Environmental Impact Analysis*, of this EIR have the potential to be classified as having a low to high paleontological sensitivity. Therefore, all projects within the City of Santa Fe Springs that involve grading or disturbance to site soils (either native or imported from other areas within the region) would have the potential to result in impacts to paleontological resources.

However, with incorporation of Mitigation Measure PAL-1 which includes paleontological monitoring, the potential for the proposed Project to result in cumulatively considerable impacts to paleontological resources would be reduced to a less-than-significant level. As detailed in Mitigation Measure PAL-1, recovered fossils would be preserved in an accredited institution. Therefore, the potential impacts from the proposed Project would be less than cumulatively considerable with implementation of Mitigation Measure PAL-1.

5.3.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- Public Resources Code (PRC) Section 5097.5

5.3.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements Impacts GEO-1 i-iv, GEO-2, GEO-3, GEO-4, and GEO-5 would be less than significant.

Without mitigation, the following impacts would be **potentially significant**:

Impact GEO-6: Project implementation could uncover subsurface paleontological resources.

5.3.10 MITIGATION MEASURES

MM PAL-1: Paleontological Monitoring. Paleontological monitoring shall be required during mass grading and excavation activities in undisturbed alluvial deposits. Furthermore, full time paleontological monitoring shall be required in undisturbed alluvial deposits during excavation and grading activities starting at five feet below the surface. The following guidelines shall be implemented to reduce adverse impacts to paleontological resources to a level below significant. These guidelines follow the City of Santa Fe Springs's guidelines and the recommendations of the Society of Vertebrate Paleontology:

1. All mitigation programs shall be performed by a qualified professional (Project) paleontologist, defined as an individual with a master's or doctorate degree in paleontology or geology who has proven experience in paleontology and who is knowledgeable in professional paleontological procedures and techniques. Fieldwork shall be conducted by a qualified paleontological monitor, defined as an individual who has experience in the collection and salvage of fossil materials. The paleontological monitor shall always work under the direction of a qualified paleontologist.
2. Prior to the issuance of a grading permit, the Project Applicant or developer shall provide written verification to the City of Santa Fe Springs Planning Department, or designee, stating that a professional paleontologist (who meets the Society of Vertebrate Paleontology's definition for qualified profession paleontologist) has been retained to implement the monitoring program.
3. Prior to initiation of any grading, drilling, and/or excavation activities, a preconstruction meeting shall be held and attended by the Project paleontologist, representatives of the grading contractor and subcontractors, the Project Applicant or developer, and a representative of the City of Santa Fe Springs. The nature of potential paleontological resources shall be discussed, as well as the protocol to be implemented following the discovery of any fossiliferous materials.
4. Monitoring of mass grading and excavation activities shall be performed by a qualified paleontologist or paleontological monitor. Starting at five feet below the surface, monitoring shall be conducted full-time in areas of grading or excavation in undisturbed soils. If paleontological resources are discovered, the area of the discovery shall be cordoned off and a qualified, project-level paleontologist shall be consulted to determine the significance of the finds.
5. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface or, if present, are determined by qualified paleontological personnel upon exposure and examination to have a low potential to contain or yield fossil resources.
6. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil

invertebrates and vertebrates. The monitor shall have authority to temporarily halt or divert equipment to allow for the removal of abundant or large specimens in a timely manner.

7. Paleontological salvage during trenching and boring activities is typically from the generated spoils and does not delay the trenching or drilling activities. Fossils shall be collected and placed in cardboard flats or plastic buckets and identified by field number, collector, and date collected. Notes shall be taken on the map location and stratigraphy of the discovery site, and the discovery site will be photographed before it is vacated and the fossils are moved to a safe place.
8. In accordance with the “Microfossil Salvage” section of the Society of Vertebrate Paleontology Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources 2010 guidelines, bulk sampling and screening of fine-grained sedimentary deposits (including carbonate-rich paleosols) must be performed if the deposits are identified to possess indications of producing fossil “microvertebrates” to test the feasibility of the deposit to yield fossil bones and teeth.
9. Recovered specimens shall be prepared to a point of identification and permanent preservation.
10. All fossils shall be deposited in an accredited institution (university or museum) that maintains collections of paleontological materials. All costs of the paleontological monitoring and mitigation program, including any one-time charges by the receiving institution, shall be the responsibility of the developer. Typically, the Los Angeles County Museum of Natural History is the preferred repository for fossils found in Los Angeles County.

5.3.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Compliance with existing regulatory programs and implementation of Mitigation Measure PAL-1 would reduce potential impacts associated with unique paleontological resource impacts to a level that is less than significant. Therefore, no significant and unavoidable adverse impacts related to paleontological resources would occur.

5.3.12 REFERENCES

- BFSA Environmental Services, Inc. (2024). Paleontological Records Search for the Paleontological Assessment for the NWC Telegraph & Santa Fe Springs Project. (Appendix H).
- City of Santa Fe Springs. (2021). *Santa Fe Springs 2040 General Plan*. Retrieved from City of Santa Fe Springs: <https://www.reimaginesantafesprings.org/documents#GP>
- City of Santa Fe Springs. MIG, Inc. (2021). *Santa Fe Springs General Plan and Targeted Zoning Code Update Environmental Impact Report (SCH# 2021050193)*. <https://cms5.revize.com/revize/santafespringsca/departments/planning/environmental%20documents/Environmental%20Impact%20Report%20With%20Appendices.pdf>
- LGC Geotechnical. (2024, February). *Preliminary Geotechnical Evaluation, APN 8005-0150-051, 12400 Hawkins Street, Santa Fe Springs, CA*. (Appendix E).
- Society of Vertebrate Paleontology (SVP). (2010). Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines.pdf

5.4 Greenhouse Gas Emissions

5.4.1 INTRODUCTION

This section of the Draft EIR evaluates greenhouse gas (GHG) emissions associated with the proposed Project and its contribution to global climate change. Specifically, this section evaluates the extent to which GHG emissions from the Project contribute to elevated levels of GHGs in the Earth's atmosphere and consequently contribute to climate change. This section also addresses the Project's consistency with applicable plans, policies, and public agency regulations adopted for the purpose of reducing the emissions of GHGs. The analysis within this section is based on the following:

- *Santa Fe Springs General Plan 2040*, adopted in 2022.
- *Santa Fe Springs General Plan and Targeted Zoning Code Update Environmental Impact Report*, 2021.
- *Air Quality, GHG, and Energy Impact Analysis*, Appendix B.

5.4.2 REGULATORY SETTING

5.4.2.1 State Regulations

California Assembly Bill 1493– Pavley

In 2002, the California Legislature adopted AB 1493 requiring the adoption of regulations to reduce GHG emissions in the transportation sector. In September 2004, pursuant to AB 1493, the CARB approved regulations to reduce GHG emissions from new motor vehicles beginning with the 2009 model year (Pavley Regulations). In September 2009, CARB adopted amendments to the Pavley Regulations to reduce GHG from 2009 to 2016. CARB, EPA, and the U.S. Department of Transportation's National Highway Traffic and Safety Administration (NHTSA) have coordinated efforts to develop fuel economy and GHG standards for model 2017-2025 vehicles. The GHG standards are incorporated into the "Low Emission Vehicle" (LEV) Regulations.

California Executive Order S-3-05 – Statewide Emission Reduction Targets

Executive Order S-3-05 was signed by Governor Arnold Schwarzenegger in June 2005. Executive Order S-3-05 establishes statewide emission reduction targets through the year 2050:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

Assembly Bill 1279

Assembly Bill (AB) 1279 requires the State to achieve net zero GHG as soon as possible, but no later than 2045, and achieve and maintain net negative greenhouse gas emissions thereafter. The bill also requires California to reduce statewide GHG emissions by 85 percent compared to 1990 levels and directs the California Air Resources Board to work with relevant State agencies to achieve these goals.

California Assembly Bill 32 (AB 32), Global Warming Solutions Act of 2006 (Chapter 488, Statutes of 2006)

In 2006, the Legislature passed the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32), which created a comprehensive, multi-year program to reduce GHG emissions in California. AB 32 required the California Air Resources Board (CARB or Board) to develop a Scoping Plan that describes the approach California will take to reduce GHGs to achieve the goal of reducing emissions to 1990 levels by 2020. The Scoping Plan was first approved by the Board in 2008 and must be updated at least every five years. Since 2008, there have been three updates to the Scoping Plan. Each of the Scoping Plans have included a suite of policies to help the State achieve its GHG targets, in large part leveraging existing programs whose primary goal is to reduce harmful air pollution. The 2017 Scoping Plan identified how the State could reach the 2030 climate target to reduce GHG emissions by 40 percent from 1990 levels, and substantially advance toward the 2050 climate goal to reduce GHG emissions by 80 percent below 1990 levels.

The AB 32 Scoping Plan also anticipates that local government actions will result in reduced GHG emissions because local governments have the primary authority to plan, zone, approve, and permit development to accommodate population growth and the changing needs of their jurisdictions. The Scoping Plan also relies on the requirements of Senate Bill 375 (discussed below) to align local land use and transportation planning for achieving GHG reductions.

The Scoping Plan must be updated every five years to evaluate AB 32 policies and ensure that California is on track to achieve the current GHG reduction goal. In 2017, CARB released the proposed Second Update to the Scoping Plan, which identifies the State's post-2020 reduction strategy. The Second Update reflected the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32.

On December 15, 2022, CARB adopted the 2022 Scoping Plan. The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the State to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85 percent below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to “deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor.” The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB advocates for compliance with a local GHG reduction strategy consistent with CEQA Guidelines section 15183.5.

Senate Bill 375 (Chapter 728, Statutes of 2008)

In August 2008, the Legislature passed, and on September 30, 2008, Governor Schwarzenegger signed, Senate Bill (SB) 375, which addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. Regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035, as determined by CARB, are required to consider the emission reductions associated with vehicle emission standards (see SB 1493), the composition of fuels (see Executive Order S-1-07), and other CARB-approved measures to reduce GHG emissions. Regional metropolitan planning organizations (MPOs) will be responsible for preparing a Sustainable Communities Strategy (SCS) within their Regional Transportation Plan (RTP). The goal of the SCS is to establish a development plan for the region, which, after considering transportation measures and policies, will achieve, if feasible, the GHG reduction targets. If an SCS is unable to achieve the GHG reduction target, an MPO must prepare an Alternative Planning Strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies. SB 375

provides incentives for streamlining CEQA requirements by substantially reducing the requirements for “transit priority projects,” as specified in SB 375, and eliminating the analysis of the impacts of certain residential projects on global warming and the growth-inducing impacts of those projects when the projects are consistent with the SCS or Alternative Planning Strategy. On September 23, 2010, CARB adopted the SB 375 targets for the regional MPOs.

Executive Order B-30-15 – 2030 Statewide Emission Reduction Target

Executive Order B-30-15 was signed by Governor Jerry Brown on April 29, 2015, establishing an interim statewide GHG reduction target of 40 percent below 1990 levels by 2030, which is necessary to guide regulatory policy and investments in California in the midterm, and put California on the most cost-effective path for long-term emission reductions. Under this Executive Order, all State agencies with jurisdiction over sources of GHG emissions are required to continue to develop and implement emissions reduction programs to reach the State’s 2050 target and attain a level of emissions necessary to avoid dangerous climate change. According to the Governor’s Office, this Executive Order is in line with the scientifically established levels needed in the United States to limit global warming below 2°C – the warming threshold at which scientists say there will likely be major climate disruptions such as super droughts and rising sea levels.

Senate Bill 32 (Chapter 249, Statutes of 2016)

SB 32 was signed on September 8, 2016, by Governor Jerry Brown. SB 32 requires the State to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80 percent below 1990 levels by 2050. A related bill that was also approved in 2016, AB 197 (Chapter 250, Statutes of 2016) creates a legislative committee to oversee regulators to ensure that ARB is not only responsive to the Governor, but also the Legislature.

AB 398 – Extension of Cap-and-Trade Program to 2030 (Chapter 617, Statutes of 2017)

AB 398 was signed by Governor Brown on July 25, 2017, and became effective immediately as urgent legislation. AB 398, among other things, extended the cap-and-trade program through 2030.

Senate Bill 97 (Chapter 185, Statutes of 2007)

SB 97 (Health and Safety Code Section 21083.5) was adopted in 2007 and required the Office of Planning and Research to prepare amendments to the CEQA Guidelines for the mitigation of GHG impacts. The amendments became effective on March 18, 2010. The CEQA Amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in CEQA documents. A new section, CEQA Guidelines Section 15064.4, was added to assist agencies in determining the significance of GHG emissions. Section 15064.4 gives discretion to the lead agency whether to: (1) use a model of methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. CEQA does not provide guidance to determine whether the project’s estimated GHG emissions are significant or cumulatively considerable.

The 2018 amendments to the CEQA Guidelines provided expanded guidance to lead agencies in evaluating GHG impacts, as outlined in Sections 15064.4 and 15064.7. A lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to evaluate a project’s incremental contribution to climate change, provided that the model or methodology is supported by substantial evidence.

Section 15183.5 permits programmatic GHG analysis and later project-specific tiering, as well as the preparation of Greenhouse Gas Reduction Plans. Compliance with such plans can support a determination that a project's cumulative effect is not cumulatively considerable, according to Section 15183.5(b).

CARB Advanced Clean Truck Regulation

CARB adopted the Advanced Clean Truck Regulation in June 2020 requiring truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California is required to be zero-emission. This rule directly addresses disproportionate risks and health and pollution burdens and puts California on the path for an all zero-emission short-haul drayage fleet in ports and railyards by 2035, and zero-emission “last-mile” delivery trucks and vans by 2040. The Advanced Clean Truck Regulation accelerates the transition of zero-emission medium-and heavy-duty vehicles from Class 2b to Class 8. The regulation has two components including a manufacturer sales requirement, and a reporting requirement:

- **Zero-Emission Truck Sales:** Manufacturers who certify Class 2b through 8 chassis or complete vehicles with combustion engines are required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales need to be 55 percent of Class 2b – 3 truck sales, 75 percent of Class 4 – 8 straight truck sales, and 40 percent of truck tractor sales.
- **Company and Fleet Reporting:** Large employers including retailers, manufacturers, brokers and others would be required to report information about shipments and shuttle services. Fleet owners, with 50 or more trucks, would be required to report about their existing fleet operations. This information would help identify future strategies to ensure that fleets purchase available zero-emission trucks and place them in service where suitable to meet their needs.

Title 24 Energy Efficiency Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24 Part 6: The California Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards, among other requirements. The California Energy Commission anticipates that the 2022 energy code will provide \$1.5 billion in consumer benefits and reduce GHG emissions by 10 million metric tons.

California Code of Regulations (CCR) Title 24 Part 11: The California Green Building Standards Code (CALGreen) is updated every three years. The most recent update was the 2022 California Green Building Code Standards that became effective on January 1, 2023.

The 2022 CALGreen standards that reduce GHG emissions and are applicable to the proposed Project include, but are not limited to, the following:

- **Short-term bicycle parking.** If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5 percent of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- **Long-term bicycle parking.** For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5 percent of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- **Designated parking for clean air vehicles.** In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).

- **EV charging stations.** New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106. 5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty electric vehicle supply equipment for warehouses, grocery stores, and retail stores.
- **Outdoor light pollution reduction.** Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8).
- **Construction waste management.** Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1. 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- **Excavated soil and land clearing debris.** 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reuse or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- **Recycling by Occupants.** Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- **Water conserving plumbing fixtures and fittings.** Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
 - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
 - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
 - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combined flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
 - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- **Outdoor potable water uses in landscaped areas.** Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent (5.304.1).
- **Water meters.** Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 SF or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).
- **Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 SF.** Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 SF requiring a building or landscape permit (5.304.3).

- **Commissioning.** For new buildings 10,000 SF and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

5.4.2.2 Local and Regional Regulations

City of Santa Fe Springs General Plan

The City of Santa Fe Springs General Plan contains the following goals and policies related to GHG emissions that are applicable to the Project (City of Santa Fe Springs, 2021):

Circulation Element

- Goal C-8.1 A transportation system designed to reduce vehicle miles traveled.**
- Policy C-8.1 Reducing Vehicle Miles Traveled.** Integrate transportation and land use decisions to reduce vehicle miles traveled and greenhouse gas emissions.
- Policy C-8.2 Transportation Management Strategies.** Evaluate the potential of transportation demand management strategies and intelligent transportation system applications to reduce vehicle miles traveled.
- Policy C-8.3 Employee Incentives.** Encourage businesses to provide employee incentives to utilize alternatives to conventional automobile travel (i.e., carpools, vanpools, buses, cycling, and walking).
- Policy C-8.4 Air Quality.** Encourage the implementation of employer transportation demand management requirements included in the South Coast Air Quality Management District's Regulations.
- Policy C-8.5 Employee Work Hours Variability.** Encourage businesses to use flextime, staggered working hours, telecommuting, and other means to lessen peak commuter traffic.
- Policy C-8.6 Ridesharing.** Promote ridesharing through publicity and provision of information to the public through web-based apps and other approaches through collaboration with other agencies and jurisdictions.

Conservation and Open Space Element

- Goal COS-8 Energy-efficient operations and structures.**
- Policy COS-8.1 Efficiency of Existing Buildings.** Improve energy efficiency of existing and new buildings, such as adding energy efficient appliances and fixtures, improvements to windows, reflective shingles, roof and wall insulations, and other green building strategies.
- Policy COS-8.3 Energy Efficiency Strategies.** Encourage energy-efficient strategies of all new projects (public and private), including appropriate structure orientation and site design, passive solar approaches, the use of shade trees to maximize cooling, and to reduce fossil fuel consumption for heating and cooling.
- Policy COS-8.4 Renewable Energy Industrial Facilities.** Promote the use of renewable energy and/or solar energy for large industrial operations on building rooftops or on large properties and support solar-ready buildings for large industrial buildings and warehouses.

Policy COS-9.2 Evaluate Trucking Emissions. Support low emission solutions and use of alternative fuels to improve trucking fleet fuel efficiency.

Policy COS-9.8 Air Quality and Climate Change Analyses. Require detailed air quality and climate change analyses and mitigation plans for all applications that have the potential to adversely affect air quality.

Safety Element

Policy S-3.6 Oil Drilling and Production. Promote the gradual consolidation and elimination of oil drilling and production sites to advance the City's climate adaptation and resiliency strategies, local reduction of greenhouse gases, and land use goals.

5.4.3 ENVIRONMENTAL SETTING

Gases that trap heat in the atmosphere are called greenhouse gases (GHGs). The major concern with GHGs is that increases in their concentrations are contributing to global climate change. Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature. Although there is disagreement as to the rate of global climate change and the extent of the impacts attributable to human activities, most in the scientific community agree that there is a direct link between increased emissions of GHGs and long-term global temperature increases.

The principal GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different warming potential, and CO₂ is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e). For example, SF₆ is a GHG commonly used in the utility industry as an insulating gas in circuit breakers and other electronic equipment. SF₆, while comprising a small fraction of the total GHGs emitted annually world-wide, is a much more potent GHG, with 22,800 times the global warming potential as CO₂. Therefore, an emission of one metric ton (MT) of SF₆ could be reported as an emission of 22,800 MT of CO₂e. Large emission sources are reported in million metric tons (MMT) of CO₂e. The principal GHGs are described below, along with their global warming potential.

Carbon dioxide: Carbon dioxide (CO₂) is an odorless, colorless, natural GHG. Carbon dioxide's global warming potential is 1. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (manmade) sources are from burning coal, oil, natural gas, and wood.

Methane: Methane (CH₄) is a flammable gas and is the main component of natural gas. It has a lifetime of 12 years, and its global warming potential is 28. Methane is extracted from geological deposits (natural gas fields). Other sources are landfills, fermentation of manure, and decay of organic matter.

Nitrous oxide: Nitrous oxide (N₂O) (laughing gas) is a colorless GHG that has a lifetime of 121 years, and its global warming potential is 265. Sources include microbial processes in soil and water, fuel combustion, and industrial processes.

Sulfur hexafluoride: Sulfur hexafluoride (SF₆) is an inorganic, odorless, colorless, and nontoxic, nonflammable gas that has a lifetime of 3,200 years and a high global warming potential of 23,500. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas.

Perfluorocarbons: Perfluorocarbons (PFCs) have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between

10,000 and 50,000 years. Their global warming potential ranges from 7,000 to 11,000. Two main sources of perfluorocarbons are primary aluminum production and semiconductor manufacturing.

Hydrofluorocarbons: Hydrofluorocarbons (HFCs) are a group of GHGs containing carbon, chlorine, and at least one hydrogen atom. Their global warming potential ranges from 100 to 12,000. Hydrofluorocarbons are synthetic manmade chemicals used as a substitute for chlorofluorocarbons in applications such as automobile air conditioners and refrigerants.

Some of the potential effects in California of global warming may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more forest fires, and more drought years. Globally, climate change has the potential to impact numerous environmental resources through potential, though uncertain, impacts related to future air temperatures and precipitation patterns. The projected effects of global warming on weather and climate are likely to vary regionally, but are expected to include the following direct effects:

- Higher maximum temperatures and more hot days over nearly all land areas;
- Higher minimum temperatures, fewer cold days and frost days over nearly all land areas;
- Reduced diurnal temperature range over most land areas;
- Increase of heat index over land areas; and
- More intense precipitation events.

There are also many secondary effects that are projected to result from global warming, including global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity. While the possible outcomes and the feedback mechanisms involved are not fully understood and much research remains to be done, the potential for substantial environmental, social, and economic consequences over the long term may be great.

GHGs are produced by both direct and indirect emissions sources. Direct emissions include consumption of natural gas, heating and cooling of buildings, landscaping activities and other equipment used directly by land uses. Indirect emissions include the consumption of fossil fuels for vehicle trips, electricity generation, water usage, and solid waste disposal.

5.4.3.1 Existing Conditions

State of California

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls but is still a substantial contributor to the United States (U.S.) emissions inventory total. The California Air Resource Board (CARB) compiles GHG inventories for the State of California. Based upon the 2021 GHG inventory data (i.e., the latest year for which data are available), California emitted 381.3 million metric tons of CO₂e in the year (MMTCO₂e/yr).

Existing Project Site Conditions

The 26.77-acre Project site has been utilized for oil production since approximately 1923 and contains active wells and an office building that is used to manage onsite operations. Greenhouse gas emissions are currently generated by the operation of the existing oil well uses and the related vehicle trips. To provide a conservative analysis of the Project's impacts, these existing emissions have not been calculated or deducted from the emissions that would be generated by the proposed Project.

5.4.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- GHG-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- GHG-2 Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

CEQA Guidelines Section 15064.4 provides discretion to the lead agency whether to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. In addition, CEQA does not provide guidance to determine whether the project's estimated GHG emissions are significant, but recommends that lead agencies consider several factors that may be used in the determination of significance of project related GHG emissions, including:

- The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

CEQA Guidelines Section 15064(h)3 states that a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides requirements to avoid or lessen the cumulative problem.

The SCAQMD formed a working group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the Basin in 2008. The working group developed several different options that are contained in the *Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold* (SCAQMD, 2008) document, that could be applied by lead agencies, which includes the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a greenhouse gas reduction plan. If a project is consistent with a qualifying local greenhouse gas reduction plan, it does not have significant greenhouse gas emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
 - Residential and commercial land use: 3,000 MTCO₂e per year
 - Industrial land: 10,000 MTCO₂e per year
 - Based on land use type:
 - Residential: 3,500 MTCO₂e per year
 - Commercial: 1,400 MTCO₂e per year
 - Mixed use: 3,000 MTCO₂e per year

- Tier 4 has the following options:
 - Option 1: Reduce business as usual emissions by a certain percentage; this percentage is currently undefined.
 - Option 2: Early implementation of applicable AB 32 Scoping Plan measures.
 - Option 3, 2020 Target: For service populations (SP), including residents and employees, 4.8 MTCO_{2e}/SP/year for projects and 6.6 MTCO_{2e}/SP/year for plans.
 - Option 3, 2035 Target: 3.0 MTCO_{2e}/SP/year for projects and 4.1 MTCO_{2e}/SP/year for plans.

The SCAQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO₂ concentrations at 450 ppm, thus stabilizing global climate.

Based on the foregoing guidance, the City of Santa Fe Springs has elected to rely on compliance with a local air district threshold in the determination of significance of Project-related GHG emissions. Specifically, the City has selected the interim 10,000 MTCO_{2e}/year threshold recommended by SCAQMD staff for industrial land use projects against which to compare Project-related GHG emissions.

The City understands that the 10,000 MTCO_{2e}/year threshold for industrial uses was proposed by SCAQMD a decade ago and was adopted as an interim policy; however, no permanent, superseding policy or threshold has since been adopted. The 10,000 MTCO_{2e}/year threshold was developed and recommended by SCAQMD, an expert agency, based on substantial evidence as provided in the *Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold* (SCAQMD, 2008) document and subsequent Working Group meetings (latest of which occurred in 2010). SCAQMD has not withdrawn its support of the interim threshold and all documentation supporting the interim threshold remains on the SCAQMD website on a page that provides guidance to CEQA practitioners for air quality analysis (and where all SCAQMD significance thresholds for regional and local criteria pollutants and toxic air contaminants also are listed). Further, as stated by SCAQMD, this threshold “uses the Executive Order S-3-05 goal [80 percent below 1990 levels by 2050] as the basis for deriving the screening level” and, thus, remains valid for use in 2024 and for purposes of this Draft EIR. Lastly, this threshold has been used for hundreds, if not thousands of GHG analyses performed for projects located within the SCAQMD jurisdiction.

Thus, for purposes of this analysis, if Project-related GHG emissions do not exceed the 10,000 MTCO_{2e}/year threshold, then Project-related GHG emissions would clearly have a less-than-significant impact pursuant to Threshold GHG-1. On the other hand, if Project-related GHG emissions exceed 10,000 MTCO_{2e}/year, the Project would be considered a substantial source of GHG emissions.

5.4.5 METHODOLOGY

A Greenhouse Gas Impact Analysis was prepared for the Project using the California Emissions Estimator Model (CalEEMod) version 2022.1.1.20 to determine construction and operational GHG emissions for buildout of the proposed Project, based on the maximum development assumptions outlined in Section 3.0, Project Description. The purpose of this model is to calculate construction-source and operational-source GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from measures incorporated into the Project to reduce or minimize GHG emissions. For construction phase Project emissions, GHGs are quantified and, per SCAQMD methodology, the total GHG emissions for construction activities are divided by 30 years, and then added to the annual operational phase of GHG emissions.

In addition, CEQA requires the lead agency to consider the extent to which the Project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Therefore, this section addresses whether the Project complies with various

programs and measures designed to reduce GHG emissions. There is no statewide program or regional program or plan that has been adopted with which all new development must comply; thus, this analysis has identified the regulations most relevant to the City of Santa Fe Springs and the proposed Project.

5.4.6 ENVIRONMENTAL IMPACTS

IMPACT GHG-1: THE PROJECT WOULD NOT GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT.

Less than Significant Impact.

Construction

Implementation of the proposed Project would generate GHG emissions from well closure activities, construction activities, haul trips, vendor trips, and construction worker vehicle trips. For construction emissions, the SCAQMD recommends amortizing emissions over 30 years by calculating the total GHG emissions for the construction activities, dividing it by a 30-year project life, then adding that number to the annual operational phase GHG emissions, which is done within this analysis. Table 5.4-1 provides the estimated construction emissions from the Project. As shown, the Project would emit a total of 2,119 Annual MTCO_{2e} over the duration of construction, with 2025 having the highest emission level (1,125 MTCO_{2e}). Amortized over 30 years, the Project's construction emissions would be approximately 71 MTCO_{2e} per year.

Table 5.4-1: Project Construction Greenhouse Emissions

Activity	Annual GHG Emissions (MTCO_{2e})
2025	1,125
2026	985
2027	9
Total Emissions	2,119
Total Emissions Amortized Over 30 Years	71

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Operation

Long-term operations of uses proposed by the Project would generate GHG emissions from the following primary sources:

- **Area Source Emissions.** Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping.
- **Energy Source Emissions.** GHGs are emitted from buildings as a result of activities for which electricity and natural gas¹ are typically used as energy sources. Combustion of any type of fuel emits CO₂ and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions.

¹ The proposed Project would not connect to natural gas. Therefore, the GHG modeling provides a conservative analysis.

- **Mobile Source Emissions.** The Project-related GHG emissions are derived primarily from vehicle trips generated by the Project, including employee trips to and from the site and truck trips associated with the proposed uses. Trip characteristics from the Traffic Impact Analysis were utilized to quantify the GHGs from operation of the Project at buildout. To determine emissions from passenger car vehicles, the CalEEMod defaults were utilized for trip lengths for passenger car vehicles.
 - **Construction:** The hauling trip length during grading was adjusted from the CalEEMod default 20.0 miles to 31.1 miles to account for the extended mileage for export hauling trips. The average of the assumed import trip length of 20 miles and the export trip length of 80 miles (trip distance to City of Adelanto, which is where the contaminated soil would be disposed of, is approximately 80 miles away) over the total import and export truck trips, 15,866 and 3,125 trips, respectively, resulted in a trip length of 29.9 miles, but a previous estimate of 31.1 miles was used and provides a conservative estimate of the hauling trip length.
 - **Operation:** The trip rate was adjusted to match the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition auto trip rates for manufacturing and warehouse trips. Truck trip lengths were obtained from the WAIRE Menu Technical Report Appendix B, Truck Trip Lengths (SCAQMD, 2021). To determine emissions from trucks for the proposed industrial uses, the analysis incorporated the SCAQMD recommended truck trip length, applied to the User Defined Industrial land use in CalEEMod, where 2-axle trucks were assumed to have a 15.3 mile trip length were applied to non-residential H-W (home to work trips); 3-axle trucks with a 14.2 mile trip length were applied to non-residential W-O (work to other); and 4+ axle trucks with a 40 mile trip length were applied to non-residential O-O (other to other trips). The vehicle splits for 2-axle trucks (33.5%), 3-axle trucks (11.7%), and 4-axle trucks (54.8%) were based on the operational trip generation provided by the VMT Screening Analysis that was prepared for the Project.
- **On-Site Cargo Handling Equipment Emissions.** The Project would also require operation of exterior cargo handling equipment in the buildings truck court areas. The modeled operational equipment includes one compressed natural gas (CNG) fueled forklift per 10,000 SF would be used for operational purposes, totaling 58 forklifts were assumed, with 29 CNG and 29 electric that would operate 4 hours a day, 365 days a year, for a conservative analysis.
- **Stationary Source Emissions.** It is anticipated that the Project would utilize two emergency generators and two fire pumps were assumed to operate 1 hour a day for a total of 50 hours per year in accordance SCAQMD Rule 1470, that requires stationary diesel-fueled internal combustion shall not operate more than 50 hours per year.
- **Water Supply, Treatment, and Distribution.** Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required depends on the volume of water as well as the sources of the water. For purposes of analysis, CalEEMod default parameters were used.
- **Solid Waste.** The proposed land uses would result in the generation and disposal of solid waste. A percentage of this waste would be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted would be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material.

The *Air Quality, Energy, and GHG Impact Analysis* prepared for the proposed Project (Appendix B) describes that the GHG emissions generated from the proposed Project at buildout are primarily associated with non-construction related mobile sources, such as vehicle and truck trips. The annual GHG emissions associated with the proposed Project are summarized in Table 5.4-2. As shown, construction and operation of the Project would generate a net total of approximately 9,006 MTCO_{2e} per year, which would not exceed the screening threshold of 10,000 MTCO_{2e} per year.

Table 5.4-2: Project Generated Greenhouse Gas Emissions

Activity	Annual GHG Emissions (MTCO _{2e})
Project Operational Emissions	
Mobile	6,280
Area	12
Energy	1,414
Water	330
Waste	177
Refrigeration	235
Off-Road	469
Stationary	18
Total Operational Emissions	8,935
Project Total Emissions	
Amortized Construction Emissions	71
Total Project Emissions	9,006
Significance Threshold	10,000
Threshold Exceeded?	No

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

As Project-related GHG emissions would not exceed the 10,000 MTCO_{2e}/year threshold, Project-related GHG emissions would be less than significant. It should be noted that this is a conservative assumption that does not subtract (or account for) the GHG emissions from the existing oil well uses on the site and does not include reductions in emissions that would be achieved by implementation of the AQMD Rule 2305, which is tenant specific and cannot be quantified at this time.

IMPACT GHG-2: THE PROJECT WOULD NOT CONFLICT WITH AN APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES.

Less than Significant Impact. The Project would provide contemporary, energy-efficient/energy-conserving design features and operational procedures. The proposed Project would not interfere with the State's implementation of AB 1279's target of 85 percent below 1990 levels and carbon neutrality by 2045 because it does not interfere with implementation of the GHG reduction measures listed in CARB's Updated Scoping Plan (2022), as demonstrated below. CARB's 2022 Scoping Plan reflects the 2045 target of an 85 percent reduction below 1990 levels, set by Executive Order B-55-18, and codified by AB 1279. In addition, the Project would be consistent with the following State policies that were adopted for the purpose of reducing GHG emissions:

- Pavley Emissions Standards and Low Carbon Fuel Standard:** Pavley emissions standards (AB 1493) apply to all new passenger vehicles starting with model year 2009, and the Low Carbon Fuel Standard became effective in 2010 and regulates the transportation fuel used. The second phase of implementation of the Pavley regulations per AB 1493 is referred to as the Advanced Clean Car program, which combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for model years 2017 through 2025. The regulation will reduce GHGs from new cars by 34 percent from 2016 levels by 2025. The proposed Project is consistent with these requirements as they apply to all new passenger vehicles and vehicle fuel purchased in California.

- **Medium/Heavy-Duty Vehicle Regulations:** Medium/heavy-duty vehicle regulations are implemented by the State to reduce emissions from trucks. Since the proposed Project has a large truck component, these regulations would aid in reducing GHG emissions from the Project. The proposed Project is consistent with this measure and its implementation as medium and heavy-duty vehicles associated with construction and operation of the Project would be required to comply with the requirements of this regulation.
- **Tractor-Trailer Greenhouse Gas Regulation:** Tractor-trailers subject to this State regulation are primarily 53-foot or longer box-type trailers, and are required to either use EPA SmartWay certified tractors and trailers or retrofit their existing fleet with SmartWay verified technologies. The proposed Project is consistent with this regulation, as it applies to specific trucks that are used throughout the State.
- **Energy Efficiency – Title 24/CALGreen:** The proposed Project is subject to the CALGreen code (Part 11 of Title 24) building energy efficiency requirements that offer builders better windows, insulation, lighting, ventilation systems, and other features as listed in Section 5.4.2, *Regulatory Setting*, which reduce energy consumption. Compliance with the CALGreen standards would be verified by the City during the building permitting process.
- **Renewable Portfolio Standard:** As a customer of Southern California Edison (SCE), the proposed Project would purchase from an increasing supply of renewable energy sources and more efficient baseload generations which reduce GHG emissions and would be consistent with this requirement. Furthermore, the Project buildings would each feature a solar-ready roof, consistent with Title 24 requirements.
- **Million Solar Roofs Program:** The proposed Project is consistent with this scoping plan measure as both Project buildings would include a solar-ready roof.
- **Water Efficiency and Waste Diversion:** Development and operation of the proposed Project would be implemented in consistency with water conservation requirements (as included in Title 24) and solid waste recycling and landfill diversion requirements of the State.

As detailed in Table 5.4-3, the Project is consistent with the CARB 2022 Scoping Plan.

Table 5.4-3: Project Consistency with the CARB 2022 Scoping Plan

Action	Consistency
GHG Emissions Reductions Relative to the SB 32 Target	
40% Below 1990 levels by 2030.	Consistent. The Project would comply with the Title 24, Part 6 building energy requirements along with other local and state initiatives that aim to achieve the 40% below 1990 levels by 2030 goal. Also, as detailed in Table 5.4-2, the Project would generate a net total of approximately 9,006 MTCO ₂ e per year, which would not exceed the screening threshold of 10,000 MTCO ₂ e per year; and therefore, is consistent with attainment of the 40% below 1990 levels by 2030 goal.
Smart Growth/Vehicle Miles Traveled VMT	
VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045.	Consistent. As discussed in Chapter 5.9, <i>Transportation</i> , with compliance with existing rules and implementation of CAPCOA measures T-5 through T-11 that are included as Mitigation Measure T-1, the HBW VMT per employee of the Project would be reduced by 23.8 percent, as shown in Table 5.9-4, <i>Mitigated Project VMT Analysis</i> . Therefore, the Project would implement policies aimed at reducing VMT.
Light-Duty Vehicle (LDV) Zero-Emission Vehicles (ZEVs)	
100% of LDV sales are ZEV by 2035.	Consistent. The proposed Project does not involve LDV sales; however, the Project would be designed and constructed in

Action	Consistency
	accordance with the 2022 Title 24 Part 6 and Part 11 requirements, which includes ZEV designated parking spaces.
Truck ZEVs	
100% of medium-duty (MDV)/HDC sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report).	Consistent. The proposed Project does not involve MDV/HDC sales; however, the Project would be designed and constructed in accordance with the 2022 Title 24 Part 6 and Part 11 requirements, which includes ZEV designated parking spaces.
Aviation	
20% of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045. Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries.	Not Applicable. The proposed Project would not utilize aviation fuel.
Ocean-going Vessels (OGV)	
2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. 25% of OGVs utilize hydrogen fuel cell electric technology by 2045.	Not Applicable. The proposed Project would not utilize any OGVs.
Port Operations	
100% of cargo handling equipment is zero-emission by 2037. 100% of drayage trucks are zero emission by 2035.	Not Applicable. The proposed Project would not impact any operations at any ports.
Freight and Passenger Rail	
100% of passenger and other locomotive sales are ZEV by 2030. 100% of line haul locomotive sales are ZEV by 2035. Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity.	Not Applicable. The proposed Project would not involve any rail operations.
Oil and Gas Extraction	
Reduce oil and gas extraction operations in line with petroleum demand by 2045.	Consistent. The Project would remove the existing oil wells and related equipment on the Project site and redevelop the area for light industrial warehousing uses, which would reduce oil extraction operations.
Petroleum Refining	
CCS on majority of operations by 2030, beginning in 2028. Production reduced in line with petroleum demand.	Not Applicable. The proposed Project would not involve any petroleum refining.
Electricity Generation	
Sector GHG target of 38 million metric tons of carbon dioxide equivalent (MTCO _{2e}) in 2030 and 30 MTCO _{2e} in 2035. Retail sales load coverage 134 20 gigawatts (GW) of offshore wind by 2045. Meet increased demand for electrification without new fossil gas-fired resources.	Consistent. The Project would comply with the 2022 Title 24, Part 6 building energy including efficiency and renewable energy requirements.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030.	Consistent. The Project would comply with the 2022 Title 24, Part 6 building energy requirements, including installing electrical wiring for all built in appliances.

Action	Consistency
Existing Residential Buildings	
80% of appliance sales are electric by 2030 and 100% of appliance sales are electric by 2035. Appliances are replaced at end of life such that by 2030 there are 3 million all-electric and electric-ready homes—and by 2035, 7 million homes—as well as contributing to 6 million heat pumps installed statewide by 2030.	Not Applicable. The proposed Project would not involve the operation any existing residential buildings.
Existing Commercial Buildings	
80% of appliance sales are electric by 2030, and 100% of appliance sales are electric by 2045. Appliances are replaced at end of life, contributing to 6 million heat pumps installed statewide by 2030.	Not Applicable. The proposed Project would not involve any existing commercial buildings.
Food Products	
7.5% of energy demand electrified directly and/or indirectly by 2030; 75% by 2045.	Consistent. The proposed Project would comply with the 2022 Title 24, Part 6 including energy efficiency and renewable energy generation requirements.
Construction Equipment	
25% of energy demand electrified by 2030 and 75% electrified by 2045.	Consistent. Through City permitting the proposed Project would be required to use construction equipment that are registered by CARB and meet CARB's standards. CARB sets its standards to be in line with the goal of reducing energy demand by 25% in 2030 and 75% in 2045.
Chemicals and Allied Products; Pulp and Paper	
Electrify 0% of boilers by 2030 and 100% of boilers by 2045. Hydrogen for 25% of process heat by 2035 and 100% by 2045. Electrify 100% of other energy demand by 2045.	Consistent. The proposed Project would not be utilized for pulp and/or paper products food products. The proposed Project would comply with the 2022 Title 24, Part 6 building energy requirements, including installing electrical wiring for all built in appliances.
Stone, Clay, Glass, and Cement	
CCS on 40% of operations by 2035 and on all facilities by 2045. Process emissions reduced through alternative materials and CCS.	Consistent. The proposed Project would not include manufacturing of stone, clay, glass or cement. In addition, all necessary and applicable air permits associated with the storage of stone, clay, glass, and/or cement would be obtained before operations commence.
Other Industrial Manufacturing	
0% energy demand electrified by 2030 and 50% by 2045.	Consistent. The proposed Project would comply with the 2022 Title 24, Part 6 including energy efficiency and renewable energy generation requirements.
Combined Heat and Power	
Facilities retire by 2040.	Not Applicable. The proposed Project would not involve any existing combined heat and power facilities.
Agriculture Energy Use	
25% energy demand electrified by 2030 and 75% by 2045.	Not Applicable. The proposed Project would not involve any agricultural uses.
Low Carbon Fuels for Transportation	
Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	Not Applicable. The proposed Project would not involve any production of biofuels.

Action	Consistency
Low Carbon Fuels for Buildings and Industry	
In 2030s, biomethane ¹³⁵ blended in pipeline Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040. In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters	Not Applicable. The proposed Project would not involve any production of fuels for buildings and industry.
Non-Combustion Methane Emissions	
Increase landfill and dairy digester methane capture. Some alternative manure management deployed for smaller dairies. Moderate adoption of enteric strategies by 2030. Divert 75% of organic waste from landfills by 2025. Oil and gas fugitive methane emissions reduced 50% by 2030 and further reductions as infrastructure components retire in line with reduced fossil gas demand.	Not Applicable. The proposed Project would not involve any landfill and/or dairy uses.
High GWP Potential Emissions	
Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions.	Consistent. The Project would comply with the 2022 Title 24, Part 6 building energy requirements, including use of low GWP refrigerants.

It should be noted that the Project's consistency with the 2022 Scoping Plan also satisfies consistency with AB 32 since the 2022 Scoping Plan is based on the overall targets established by AB 32 and SB 32. Thus, the Project would be consistent with the State's requirements for GHG reductions.

In addition, as detailed in Table 5.4-4, the Project would not conflict with the relevant General Plan goals and policies related to GHG emissions.

Table 5.4-4: Project Consistency with the City General Plan Policies Related to GHGs

General Plan Goal or Policy	Consistency
Goal C-8.1: A transportation system designed to reduce vehicle miles traveled.	Consistent. The proposed Project would follow all applicable South Coast AQMD policies for construction and would implement best management practices during construction of the Project.
Policy C-8.1: Reducing Vehicle Miles Traveled. Integrate transportation and land use decisions to reduce vehicle miles traveled and greenhouse gas emissions.	Consistent. The proposed Project would be consistent with the existing Industrial land use that is nearby regional transportation corridor that would reduce VMT from warehousing and transportation of goods.
Policy C-8.2: Transportation Management Strategies. Evaluate the potential of transportation demand management strategies and intelligent transportation system applications to reduce vehicle miles traveled.	Consistent. As discussed in Chapter 5.9, <i>Transportation</i> , Mitigation Measure TRA-1 incorporates CAPCOA Measures T-5 through T-11. Mitigation Measure T-1 requires mandatory implementation of a commute trip reduction program that includes monitoring (CAPCOA Measure T-6). The commute trip reduction program would include all other elements described for the voluntary program (CAPCOA Measure T-5) including: implementation of a commute trip reduction marketing (CAPCOA Measure T-7), providing a rideshare program (CAPCOA Measure T-8), implementation of a subsidized

General Plan Goal or Policy	Consistency
	or discounted transit program (CAPCOA Measure T-8), providing end-of-trip bicycle facilities (CAPCOA Measure T-10), and providing employer-sponsored vanpool(s) (CAPCOA Measure T-7). Thus, the proposed Project would implement transportation demand management strategies.
Policy C-8.3: Employee Incentives. Encourage businesses to provide employee incentives to utilize alternatives to conventional automobile travel (i.e., carpools, vanpools, buses, cycling, and walking).	Consistent. As detailed in the previous response, the proposed Project would: implement a commute trip reduction marketing (CAPCOA Measure T-7), provide a rideshare program (CAPCOA Measure T-8), implement a subsidized or discounted transit program (CAPCOA Measure T-8), provide end-of-trip bicycle facilities (CAPCOA Measure T-10), and provide employer-sponsored vanpool(s) (CAPCOA Measure T-7).
Policy C-8.4: Air Quality. Encourage the implementation of employer transportation demand management requirements included in the South Coast Air Quality Management District's Regulations.	Consistent. As detailed in the previous two responses.
Policy C-8.5: Employee Work Hours Variability. Encourage businesses to use flextime, staggered working hours, telecommuting, and other means to lessen peak commuter traffic.	Consistent. The future tenants of the proposed buildings are unknown; however, flextime and workhour variability could be included in the commute trip reduction programs described previously, which would be implemented by Mitigation Measure T-1.
Policy C-8.6: Ridesharing. Promote ridesharing through publicity and provision of information to the public through web-based apps and other approaches through collaboration with other agencies and jurisdictions.	Consistent. As detailed previously, the proposed Project would provide a rideshare program (CAPCOA Measure T-8), implement a subsidized or discounted transit program (CAPCOA Measure T-8), and provide employer-sponsored vanpool(s) (CAPCOA Measure T-7).
Goal COS-8: Energy-efficient operations and structures.	Consistent. The proposed Project would comply with the 2022 Title 24, Part 6 including energy efficiency and renewable energy generation requirements.
Policy COS-8.1: Efficiency of Existing Buildings. Improve energy efficiency of existing and new buildings, such as adding energy efficient appliances and fixtures, improvements to windows, reflective shingles, roof and wall insulations, and other green building strategies.	Consistent. The proposed new buildings would be energy efficient and would comply with the 2022 Title 24, Part 6 including energy efficiency and renewable energy generation requirements.
Policy COS-8.3 : Energy Efficiency Strategies. Encourage energy-efficient strategies of all new projects (public and private), including appropriate structure orientation and site design, passive solar approaches, the use of shade trees to maximize cooling, and to reduce fossil fuel consumption for heating and cooling.	Consistent. The proposed new buildings would be energy efficient and would comply with the 2022 Title 24, Part 6 including energy efficiency and renewable energy generation requirements.
Policy COS-8.4: Renewable Energy Industrial Facilities. Promote the use of renewable energy and/or solar energy for large industrial operations on building rooftops or on large properties and support solar-ready buildings for large industrial buildings and warehouses.	Consistent. The proposed new industrial/warehouse buildings would be energy efficient and would comply with the 2022 Title 24, Part 6 including energy efficiency and renewable energy generation requirements, such as those related to solar.
Policy COS-9.2: Evaluate Trucking Emissions. Support low emission solutions and use of alternative fuels to improve trucking fleet fuel efficiency.	Consistent. Trucking emissions from the proposed Project have been evaluated in Section 5.1, <i>Air Quality</i> , and Appendix B and were determined to be less than significant. Future statewide regulations would continue to support low emissions and alternative fuels.

General Plan Goal or Policy	Consistency
Policy COS-9.8: Air Quality and Climate Change Analyses. Require detailed air quality and climate change analyses and mitigation plans for all applications that have the potential to adversely affect air quality.	Consistent. Air quality and climate change analysis for the proposed Project have been completed and provided in Section 5.1, <i>Air Quality</i> and herein in Section 5.4, <i>Greenhouse Gas Emissions</i> , (and Appendix B) and were determined to be less than significant with implementation of Mitigation Measure AQ-1 for use of low ROG/VOC paints during construction.
Policy S-3.6: Oil Drilling and Production. Promote the gradual consolidation and elimination of oil drilling and production sites to advance the City's climate adaptation and resiliency strategies, local reduction of greenhouse gases, and land use goals.	Consistent. The Project would remove the existing oil wells and related equipment on the Project site and redevelop the area for light industrial warehousing uses, which would eliminate oil drilling and production sites.

5.4.7 CUMULATIVE IMPACTS

GHG emissions impacts are assessed in a cumulative context, since no single project can cause a discernible change to climate. Climate change impacts are the result of incremental contributions from natural processes, and past and present human-related activities. Therefore, the area in which a proposed project in combination with other past, present, or future projects, could contribute to a significant cumulative climate change impact would not be defined by a geographical boundary such as a project site or combination of sites, city, or air basin. GHG emissions have high atmospheric lifetimes and can travel across the globe over a period of 50 to 100 years or more. Even though the emissions of GHGs cannot be defined by a geographic boundary and are effectively part of the global issue of climate change, CEQA places a boundary for the analysis of impacts at the State's borders. Thus, the geographic area for analysis of cumulative GHG emissions impacts is the State of California.

Executive Order S-3-05, Executive Order B-30-15, Executive Order B-55-18, AB 1279, AB 32, and SB 32 recognize that California is a source of substantial amounts of GHG emissions; recognize the significance of the cumulative impact of GHG emissions from sources throughout the state; and set performance standards for reduction of GHGs.

The analysis of GHG emission impacts under CEQA contained in this Draft EIR effectively constitutes an analysis of the Project's contribution to the cumulative impact of GHG emissions. CEQA Guidelines Section 15183.5(b) states that compliance with GHG-related plans can support a determination that a project's cumulative effect is not cumulatively considerable. As described previously, the estimated GHG emissions from development and operation of the Project would not exceed SCAQMD thresholds and the proposed Project would be consistent with relevant plans, policies, and programs adopted for the purpose of reducing the emissions of GHGs. Therefore, the Project would not result in cumulatively considerable GHG impacts and cumulative GHG impacts would be less than significant.

5.4.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

State

- Clean Car Standards – Pavley Assembly Bill 1493
- California Executive Order S-3-05
- Assembly Bill 32 (Global Warming Solutions Act of 2006)

- Senate Bill 375
- California Executive Order B-30-15
- Senate Bill 32
- California Energy Code (Code of Regulations, Title 24 Part 6)
- California Green Building Standards Code (Code of Regulations, Title 24 Part 11)

Local

None.

5.4.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impact GHG-1 and GHG-2 would be less than significant.

5.4.10 MITIGATION MEASURES

None.

5.4.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Upon implementation of existing regulatory requirements, potential impacts related to GHG emissions would be less than significant. No significant and unavoidable impacts associated with GHG emissions would occur.

5.4.12 REFERENCES

California Air Pollution Control Officers Association, CEQA and Climate Change. (2008). Accessed at: <http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA-White-Paper.pdf>

California Air Resources Board. (2023). *California Greenhouse Gas Emission Inventory Program*.
<https://ww2.arb.ca.gov/ghg-inventory-data>

City of Santa Fe Springs. (2021). *Santa Fe Springs 2040 General Plan*.
<https://www.reimaginesantafesprings.org/documents#GP>

EPD Solutions, Inc. (2024). *Northwest Corner Telegraph Road and Santa Fe Springs Road Air Quality, Energy, and GHG Impact Analysis*. **Appendix B**.

South Coast Air Quality Management District. (2008). *Final Localized Significance Threshold Methodology, Appendix C- LST Lookup Tables*. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/calemod-guidance.pdf>

5.5 Hazards and Hazardous Materials

5.5.1 INTRODUCTION

This section presents hazards and hazardous materials conditions within the Project site and evaluates the potential for the construction or operation of the proposed Project to result in significant impacts related to exposing people or the environment to adverse hazards and hazardous materials conditions, and potential location on a hazardous materials site.

The term “hazardous material” is defined as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment (State of California, Health and Safety Code, Chapter 6.95, Section 25501(o)). The analysis in this section is based on the following documents and resources:

- *Santa Fe Springs General Plan 2040*, adopted in 2022
- City of Santa Fe Springs Municipal Code
- *Santa Fe Springs General Plan and Targeted Zoning Code Update Environmental Impact Report*, , 2021
- *Phase I Environmental Site Assessment (Phase I ESA)*, prepared by Partner Engineering and Science, Inc., 2022 (Appendix I)
- *Phase II Subsurface Investigation Report (Phase II ESA)*, prepared by Partner Engineering and Science, Inc., 2023 (Appendix J)
- *Additional Subsurface Investigation Report*, prepared by Partner Engineering and Science, Inc., 2024 (Appendix K)

5.5.2 REGULATORY SETTING

5.5.2.1 Federal Regulations

Hazardous Materials Management

The primary federal agencies responsible for hazardous materials management include the United States Environmental Protection Agency (USEPA) and the United States Department of Labor Occupational Safety and Health Administration (OSHA).

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

Adopted in 1980, the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) was developed to remove contamination of water, air, and land resources from past chemical disposal practices. Also known as the “Superfund Act,” CERCLA contains a list of sites referred to as Superfund sites, where there is an imminent threat to human health. CERCLA collects taxes from the chemical and petroleum industries to clean abandoned or uncontrolled hazardous sites using short term and long-term techniques. CERCLA allows the USEPA to clean up contaminated sites by assigning liability and ensuring responsible

parties either remediate the site or reimburse the government for EPA-led efforts. When no viable responsible party can be identified, public funds are allocated for remedial action of contaminated sites.

Resource Conservation and Recovery Act of 1976

Federal hazardous waste regulations are generally promulgated under the Resource Conservation and Recovery Act (RCRA). Pursuant to RCRA, the USEPA regulates the generation, transportation, treatment, storage, and disposal of hazardous waste in a “cradle to grave” manner. RCRA was designed to protect human health and the environment, reduce/eliminate the generation of hazardous waste, and conserve energy and natural resources. The USEPA has largely delegated responsibility for implementing the RCRA program in California to the State, which implements this program through the California Hazardous Waste Control Law.

RCRA regulates landfill siting, design, operation, and closure (including identifying liner and capping requirements) for licensed landfills. In California, RCRA landfill requirements are delegated to the California Department of Resources Recycling and Recovery (CalRecycle), which is discussed in detail below.

RCRA allows the USEPA to oversee the closure and post-closure of landfills. Additionally, the federal Safe Drinking Water Act, 40 CFR Part 141, gives the USEPA the power to establish water quality standards and beneficial uses for waters from below- or above-ground sources of contamination. For the Project area, water quality standards are administered by the Regional Water Quality Control Board (RWQCB).

RCRA also allows the USEPA to control risk to human health at contaminated sites. Vapor intrusion presents a significant risk to human populations overlying contaminated soil and groundwater and is considered when conducting human health risk assessments and developing Remedial Action Objectives.

Occupational Safety and Health Act of 1970

Federal and State occupational health and safety regulations also contain provisions regarding hazardous waste management through the Occupational Safety and Health Act of 1970 (amended), which is implemented by the United States Department of Labor Occupational Safety and Health Administration (OSHA). Title 29 of the Code of Federal Regulations (29 CFR) requires special training of handlers of hazardous materials; notification to employees who work in the vicinity of hazardous materials; acquisition from the manufacturer of safety data sheets (SDS), which describe the proper use of hazardous materials; and training of employees to remediate any hazardous material accidental releases. OSHA regulates the administration of 29 CFR.

OSHA also establishes standards regarding safe exposure limits for chemicals to which construction workers may be exposed. Safety and Health Regulations for Construction (29 CFR Part 1926.65 Appendix C) contains requirements for construction activities, which include occupational health and environmental controls to protect worker health and safety. The guidelines describe the health and safety plan(s) that must be developed and implemented during construction, including associated training, protective equipment, evacuation plans, chains of command, and emergency response procedures.

Adherence to applicable hazard-specific OSHA standards is required to maintain worker safety. For example, methane is regulated by OSHA under 29 CFR Part 1910.146 with regard to worker exposure to a “hazardous atmosphere” within confined spaces where the presence of flammable gas vapor or mist is in excess of 10 percent of the lower explosive limit. Title 49 of the CFR governs the manufacture of packaging and transport containers, packing and repacking, labeling, and the marking of hazardous material transport. Title 42, Part 82 governs solid waste disposal and resource recovery.

Hazardous Materials Transportation Act

The transportation of hazardous materials is regulated by the Hazardous Materials Transportation Act (HMTA), which is administered by the Research and Special Programs Administration (RSPA) of the United States Department of Transportation (USDOT). The Hazardous Materials Transportation Act provides the USDOT with a broad mandate to regulate the transport of hazardous materials, with the purpose of adequately protecting the nation against risk to life and property, which is inherent in the commercial transportation of hazardous materials. The HMTA governs the safe transportation of hazardous materials by all modes, excluding bulk transportation by water. The RSPA carries out these responsibilities by prescribing regulations and managing a user-funded grant program for planning and training grants for states and Indian tribes. USDOT regulations that govern the transportation of hazardous materials are applicable to any person who transports, ships, causes to be transported or shipped, or are involved in any way with the manufacture or testing of hazardous materials packaging or containers. USDOT regulations pertaining to the actual movement govern every aspect of the movement, including packaging, handling, labeling, marking, placarding, operational standards, and highway routing. Additionally, the USDOT is responsible for developing curriculum to train for emergency response and administers grants to states and Indian tribes for ensuring the proper training of emergency responders.

USEPA Regional Screening Levels

The USEPA provides regional screen levels (RSLs) provide values for residential and commercial or industrial exposures to soil, air, and drinking water, applicable to all EPA regions. These screening levels have been implemented to standardize the assessment of Superfund sites. In addition, the RSLs may be used to determine if a site contains significant levels of contamination, warranting the need for further investigation. Under most circumstances, the presence of a chemical in soil, soil gas, or indoor air at concentrations below the corresponding RSL can be assumed to not pose a significant health risk to people who may live or work at the site. If a site is determined to contain significant levels of hazardous materials, RSLs may be modified for site-specific risk assessment to determine remediation cleanup standards.

Title 49, Code of Federal Regulations, Chapter I

Under Code of Federal Regulations (CFR) Title 49, Chapter I, USDOT's Pipeline and Hazardous Materials Safety Administration regulates the transport of hazardous materials. Title 49, Chapter I sets forth regulations for response to hazardous materials spills or incidents during transport and requirements for shipping and packaging of hazardous materials.

Code of Federal Regulations Title 29, Section 1926.62

CFR Title 29, Section 1926.62 provides federal regulations for construction work where an employee may be occupationally exposed to lead. It includes standards for exposure assessment, worker protection, methods of compliance, biological monitoring, and medical surveillance.

5.5.2.2 State Regulations

Hazardous Materials Management and Waste Handling

In the regulation of hazardous waste management, California law often mirrors or is more stringent than federal law. The California Environmental Protection Agency (CalEPA) and California Occupational Safety and Health Administration (CalOSHA) are the primary State agencies responsible for hazardous materials management. Additionally, the California Emergency Management Agency (CalEMA) administers the California Accidental Release Prevention (CalARP) program. The California Department of Toxic Substances

Control (DTSC), which is a branch of CalEPA, regulates the generation, transportation, treatment, storage, and disposal of hazardous waste, as well as the investigation and remediation of hazardous waste sites. The California DTSC program incorporates the provisions of both federal (RCRA) and State hazardous waste laws. The California Department of Pesticide Regulation, which is a branch of CalEPA, regulates the sale, use, and cleanup of pesticides (CCR, Title 3).

Excavated soil containing hazardous substances and hazardous building materials would be classified as a hazardous waste if they exhibit the characteristics of ignitability, corrosivity, reactivity, or toxicity (CCR, Title 22, Division 4.5, Chapter 11, Article 3). State and federal laws require detailed planning to ensure that hazardous materials are properly handled, used, stored, and disposed of, and in the event that such materials are accidentally released, to prevent or to mitigate injury to health or the environment. These laws and regulations are overseen by a variety of State and local agencies. The California Integrated Waste Management Board and the RWQCB specifically address management of hazardous materials and waste handling in their adopted regulations (CCR, Title 14 and CCR, Title 27).

The primary local agency, known as the Certified Unified Program Agency (CUPA), with responsibility for implementing federal and State laws and regulations pertaining to hazardous materials management is the City of Santa Fe Springs Fire Department. The Unified Program is the consolidation of six State environmental regulatory programs into one program under the authority of a CUPA. A CUPA is a local agency that has been certified by CalEPA to implement the six State environmental programs within the local agency's jurisdiction. This program was established under the amendments to the California Health and Safety Code made by SB 1082 in 1994. The six consolidated programs are:

- Hazardous Materials Release Response Plan and Inventory (Business Plans)
- California Accidental Release Prevention (CalARP)
- Hazardous Waste (including Tiered Permitting)
- Underground Storage Tanks (USTs)
- Above Ground Storage Tanks (Spill Prevention Control and Countermeasures (SPCC) requirements)
- Uniform Fire Code (UFC) Article 80 Hazardous Material Management Program (HMMP) and Hazardous Material Identification System (HMIS)

Hazardous Waste Control Act

The Hazardous Waste Control Act was passed in 1972 and established the California Hazardous Waste Control Program within the Department of Health Services. California's hazardous waste regulatory effort became the model for the federal RCRA. California's program, however, was broader and more comprehensive than the federal system, regulating wastes and activities not covered by the federal program. California's Hazardous Waste Control Law was followed by emergency regulations in 1973 that clarified and defined the hazardous waste program.

California Government Code Section 65962.5, Cortese List

The Hazardous Waste and Substance Sites List (Cortese List) is a planning document used by the State, local agencies, and developers to comply with CEQA requirements in providing information about the location of hazardous materials release sites. Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop at least annually an updated Cortese List. The Department of Toxic Substances Control is responsible for a portion of the information contained in the Cortese List. Other State and local government agencies are required to provide additional hazardous material release information for the Cortese List.

California Code of Regulations (CCR), Title 14 Section 1723 – Plugging and Abandonment

The requirements to plug and abandon an oil well are delineated by CCR Title 14 Section 1723, which states that the following is required:

- A Notice of Intention to Abandon must be filed with the appropriate district office, and a permit to conduct operations must be received from the Geologic Energy Management Division (CalGEM), formerly the division of Oil, Gas and Geothermal Resources (DOGGR) prior to commencing operations.
- The hole shall be filled with drilling mud.
- Cement plugs shall be placed across all oil or gas zones, the fresh water/salt water interface, the casing shoe (if open hole is below the shoe), casing stub (if casing was removed from the hole), and at the surface. The length required for each plug will vary.
- If there is junk in the hole, a cement plug is required to be placed on top of the junk.
- If there is uncemented casing at the base of freshwater interface, cement shall be squeezed through perforations in the casing. The same applies if there is uncemented casing at the surface; all annuli need to be plugged.
- The bond for the well will not be released until the well is plugged and abandoned properly.
- Plugging and abandonment operations require witnessing by a CalGEM (formerly DOGGR) engineer. This shall be identified in the plugging permit.

California Code of Regulations (CCR), Title 22 – Hazardous Waste Control Law, Chapter 6.5

The Department of Toxic Substances Control regulates the generation, transportation, treatment, storage, and disposal of hazardous waste under RCRA and the California Hazardous Waste Control Law. Both laws impose “cradle-to-grave” regulatory systems for handling hazardous waste in a manner that protects human health and the environment. CalEPA has delegated some of its authority under the Hazardous Waste Control Law to county health departments and other Certified Unified Program Agencies.

CCR, Title 27 – Solid Waste

Title 27 of the CCR contains a waste classification system that applies to solid wastes that cannot be discharged directly or indirectly to waters of the State and which therefore must be discharged to waste management sites for treatment, storage, or disposal. CalRecycle and its certified Local Enforcement Agency regulate the operation, inspection, permitting, and oversight of maintenance activities at active and closed solid waste management sites and operations.

DTSC Note 3 Screening Levels

The DTSC screening levels (DTSC-SLs) were developed based on the USEPA RSLs to use in the human health risk assessment at hazardous waste sites and permitted facilities in California. Since July 2014, the DTSC-SLs are regularly reviewed and updated, with the last update in April 2019. Similar to the USEPA RSLs, the DTSC-SLs may be used to identify if a site may be contaminated and the specific contaminants that may warrant remediation.

CCR, Title 8 – Occupational Safety

CalOSHA administers federal occupational safety requirements and additional State requirements in accordance with CCR, Title 8. CalOSHA requires preparation of an Injury and Illness Prevention Program (IIPP), which is an employee safety program of inspections, procedures to correct unsafe conditions, employee

training, and occupational safety communication. This program is administered via inspections by the local CalOSHA enforcement unit.

CalOSHA regulates lead exposure during construction activities under CCR Title 8, Section 1532.1, *Lead*, which establishes the rules and procedures for conducting demolition and construction activities such that worker exposure to lead contamination is minimized or avoided.

Compliance with CalOSHA regulations and associated programs would be required for the proposed Project due to the potential hazards posed by on-site construction activities and contamination from former uses.

Emergency Response to Hazardous Materials Incidents

California has developed an emergency response plan to coordinate emergency services provided by federal, State, local government, and private agencies. The plan is administered by the California Emergency Management Agency and includes response to hazardous materials incidents. The California Emergency Management Agency coordinates the response of other agencies, including CalEPA, California Highway Patrol, California Department of Fish and Wildlife, Regional Water Quality Control Board, South Coast Air Quality Management District, County Fire Department, and the County Department of Environmental Health.

California Emergency Services Act

The California Emergency Services Act (Government Code Section 8550 et seq.) was adopted to establish the State's roles and responsibilities during human-made or natural emergencies that result in conditions of disaster and/or extreme peril to life, property, or the resources of the state. This act is intended to protect health and safety by preserving the lives and property of the people of the state.

5.5.2.3 Regional Regulations

SCAQMD Rule 1166, Volatile Organic Compound Emissions from Decontamination from Soil

This SCAQMD rule sets requirements to control the emission of volatile organic compounds (VOCs) from excavating, grading, handling, and treating VOC contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition. Pursuant to SCAQMD Rule 1166, excavating or grading soil containing VOC materials shall:

Apply for, obtain, and operate pursuant to a mitigation plan pursuant to the requirements of SCAQMD Rule 1166. Monitor for VOC contamination at least once every 15 minutes commencing at the beginning of excavation or grading and record all VOC concentration readings. Handling VOC-contaminated soil at or from an excavation or grading site shall segregate VOC-contaminated stockpiles from non-VOC contaminated stockpiles such that mixing of the stockpiles does not take place. VOC-contaminated soil stockpiles shall be sprayed with water and/or approved vapor suppressant and cover them with plastic sheeting for all periods of inactivity lasting more than one hour. A daily visual inspection shall be conducted of all covered VOC contaminated soil stockpiles to ensure the integrity of the plastic covered surfaces. Contaminated soil shall be treated or removed from an excavation or grading site within 30 days from the time of excavation.

South Coast Air Quality Management District Rule 1403

SCAQMD Rule 1403 governs the demolition of buildings containing asbestos materials. Rule 1403 specifies work practices to minimize asbestos emissions during building demolition and renovation activities, including the removal and associated disturbance of asbestos containing materials. The requirements for demolition

and renovation activities include asbestos surveying, notification, asbestos containing materials removal procedures and time schedules, handling and cleanup procedures, storage, and disposal requirements for asbestos containing waste materials.

South Coast Air Quality Management District Rule 1466

SCAQMD Rule 1466 governs fugitive dust emissions containing toxic air contaminants. Rule 1466 includes air quality measurement and construction activity requirements to reduce particulate emissions containing toxic air contaminants in the ambient air as a result of earth-moving activities, including, excavating, grading, earth-cutting and filling, loading, unloading, handling, mechanized land clearing, treating, stockpiling, transferring, and removing of soil that contains applicable toxic air contaminants, such as arsenic, lead, and mercury.

Los Angeles Regional Water Quality Control Board Dewatering Permit

On September 13, 2018, the Los Angeles RWQCB adopted the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2018-0125, National Pollution Discharge Elimination System [NPDES] No. CAG994044) (Groundwater Discharge Permit). This Permit regulates construction dewatering and discharges of groundwater to surface waters during excavation. This permit specifies the discharge prohibitions, receiving water limitations, monitoring and reporting program requirements, and general compliance determination criteria for groundwater dewatering during construction activities. Dischargers are required to collect and analyze representative groundwater samples for all constituents listed in the Groundwater Discharge Permit. Based on the results, dischargers would be required to provide treatment for any toxic compounds detected above the applicable screening levels. To obtain coverage under the Groundwater Discharge Permit, each permittee must submit a Notice of Intent to begin the application process.

5.5.2.4 Local Regulations

City of Santa Fe Springs General Plan

The City of Santa Fe Springs General Plan contains the following policies related to hazards and hazardous materials that are applicable to the proposed Project.

Safety Element Policies

- Policy S-3.1 Hazardous Waste Siting.** Discourage the siting of facilities that utilize hazardous materials or generate hazardous wastes within one-quarter mile of any private or public school, park, or similar place where people congregate in numbers.
- Policy S-3.2 Hazardous Materials Locations.** Monitor and evaluate commercial and industrial uses that generate, store, and transport hazardous materials to determine the need for buffer zones or setbacks to minimize risks to residential neighborhoods, schools, parks, and community facilities.
- Policy S-3.5 Contamination Protection.** Protect natural resources—including groundwater—from hazardous waste and materials contamination.
- Policy S-3.6 Oil Drilling and Production.** Promote the gradual consolidation and elimination of oil drilling and production sites to advance the City's climate adaptation and resiliency strategies, local reduction of greenhouse gases, and land use goals.

Policy S-3.7 Contamination Remediation. Consult with the U.S. Environmental Protection Agency and responsible State agencies on the ongoing remediation and cleanup of contaminated properties and groundwater, with aim to recondition sites for productive land uses.

City of Santa Fe Springs Municipal Code

Section 117.127 Criteria for Well Abandonment. A well shall be considered properly abandoned for the purpose of this section when all of the following events have occurred:

- A. If applicable, any holes associated with a well have been filled with native earth and compacted to a 90% compaction factor.
- B. The derrick and all appurtenant equipment thereto have been removed from the drill site. All drilling and production equipment, tanks, towers and other surface installations used in connection with the well shall have been removed from the drill site or tank farm site. The cleaning of the site shall comply with the regulations of Division of Oil, Gas and Geothermal Resources (DOGGR).
- C. All buried pipelines shall have been excavated and removed or, if approved by the Fire Chief, purged of all hydrocarbon substances and filled with water-base drilling mud or other inert materials. The surface of the land, insofar as practicable, has been left in a neat and orderly condition.
- D. The depth from ground level to the top of the well casing shall be a minimum of five feet and a maximum of 10 feet unless a different cut-off depth is approved by DOGGR.
- E. A permit to abandon the well shall be obtained from the Fire Department prior to abandonment. The Fire Chief or his designee shall witness the pouring of the last 25 feet of the cement well plug and the welding of a plate across the top of the well. The plate on the top of the abandoned well shall conform to current DOGGR requirements and include the date of abandonment. The Fire Chief or his designee shall inspect and certify in writing that the well has been properly abandoned in accordance with provisions of this section.
- F. A copy of the DOGGR Report of Well Abandonment or other final determination has been provided to the Fire Chief and the Director.

Section 117.129 Requirements Prior to New Construction. Prior to the issuance by the city of a building or grading permit for property upon which there are any active or abandoned wells, the applicant shall complete all of the following:

- A. Obtain a construction site well review from DOGGR.
- B. Conduct a soils gas study in accordance with § 117.131.
- C. Obtain a permit from the Fire Department to expose all former wells, survey their location and test each well for gas or fluid leaks under the supervision of an oil and gas professional authorized by the Fire Department. Conduct this leak test and submit results to the Fire Department.
- D. Provide a well access site map to the Planning Department for approval. The site map shall include all of the following:
 - 1. Detailed location of each well including the depth from ground level to the top of the well casing of each abandoned well in relation to finished grade.
 - 2. Demonstrate how vehicles and abandonment equipment will access each well from the public right-of-way.
 - 3. Demonstrate that adequate setbacks will be provided for setting up abandonment equipment around each well.
- E. Obtain a permit from the Fire Department for the installation of a vent cone and related equipment for all abandoned wells located below or in close proximity to the proposed new construction.

- F. Agree to implement all mitigation measures required by the Fire Chief including, but not limited to, installation and maintenance of methane barriers, vents/blowers, alarms and the like (collectively, "Methane Mitigation Systems").
- G. If applicant performs a leak test pursuant to § 117.129(C) and the test indicates the well is leaking, applicant shall abandon or reabandon the well pursuant to § 117.127.
- H. File an indemnity bond pursuant to Cal. Public Resources Code §§ 3204 or 3205.
- I. Execute and record against the property an environmental release and indemnity agreement providing that the property owner and his assignees, release, indemnify and hold harmless the city against any and all claims, obligations, and causes of action of any kind or nature whatsoever, known or unknown, for personal injury or death, property damage, economic loss, and fines and penalties. The City Attorney shall approve the form of the disclosure and indemnity agreement.

Section 117.130 Abandoned Wells That Do Not Meet Current DOGGR Standards. If DOGGR determines that a well has not been abandoned to its current standards, the Director, in consultation with the Fire Chief, may conditionally authorize issuance of a building and/or grading permit for a property if the following conditions are met:

- A. The applicant meets the requirements of § 117.129(A) through (I). For construction over an abandoned well, § 117.129(D) may be waived by the Director in consultation with the Fire Chief.
- B. The applicant shall obtain, at his sole cost, a certified report from a California-licensed professional engineer or geologist qualified and experienced with oil well abandonment indicating that it is not reasonable or feasible for the applicant to do additional well abandonment work in order to meet current DOGGR abandonment standards. The engineer's or geologist's report shall:
 - 1. Demonstrate that, as abandoned, the well will not pose any significant risk to public health, safety, welfare or the environment.
 - 2. Demonstrate that (a) the well is a safe distance from any existing or proposed structures or improvements; and (b) in the event the Fire Department or DOGGR orders reabandonment of the well, the applicant has adequate access to the well. This requirement does not apply to construction over an abandoned well.
 - 3. Provide abandonment or mitigation measures that would be necessary to mitigate any long-term significant risks once the site is developed.
- C. The applicant agrees to implement all methane mitigation systems required by the Fire Chief. The Fire Chief, in conjunction with the Director, is authorized to obtain expert analysis in order to determine whether the conditions identified in § 117.130 have been met. The cost of such expert analysis shall be paid by the applicant.

Section 117.131 Requirements for a Soils Gas Study or Methane Mitigation System. A soil gas investigation to identify the concentration of methane gas in the subsurface is required for sites within 500 feet of an existing or abandoned oil well. Based on the results of the soils gas monitoring or on information available on surrounding properties, property owners shall implement any other mitigation measures as required by the Fire Chief.

Methane mitigation systems shall be required for any regulated construction if any of the following apply:

- 1. The initial monitoring reveals methane levels in excess of 25% of the lower explosive limit (i.e., 1.25% by volume in air or 12,500 parts per million by volume [ppm/v]).
- 2. The regulated construction will impede access to an abandoned oil well.
- 3. Quarterly or annual monitoring reveals methane levels greater than 25% of the lower explosive limit (i.e., 1.25% by volume in air or 12,500 ppm/v).

The design of a methane mitigation system for property within the methane zone shall be in accordance with the requirements of the Los Angeles County Department of Public Works and City Fire Department and shall include permanent monitoring vapor probes above and below the barrier unless an alternative design is approved by the Fire Chief. Where gas detection systems are used, they shall be designed by and installed under the supervision of registered engineers. The design and installation shall be inspected and approved by the Fire Department.

In extraordinary cases, for example, where methane in excess of 25% of the lower explosive limit (i.e., 1.25% by volume in air or 12,500 ppm/v) can be demonstrated to be a non-repetitive incident, a registered petroleum engineer or other qualified persons may request a waiver by the Fire Chief for the installation of a methane mitigation system. The granting of the waiver shall be at the discretion of the Fire Chief.

Section 152.33 Extremely Hazardous Wastes. Any storage, treatment, disposal, or transportation of extremely hazardous waste as defined in Cal. Health and Safety Code § 25115, by the facility owner/operator shall be reported to the Director of Planning and Fire Chief at least 48 hours prior to such storage, treatment, disposal, or transportation.

Los Angeles Regional NPDES Permit

The City of Santa Fe Springs is a permittee under the Los Angeles RWQCB Order No. R4-2012-0175 (NPDES Permit No. CAS004001), adopted on November 8, 2012, which is a county-wide MS4 permit that regulates urban runoff for the County of Los Angeles, Los Angeles County Flood Control District, and 84 incorporated cities in Los Angeles County (except Long Beach). The Los Angeles County MS4 Permit was most recently amended on September 11, 2021, by Order No. R4-2021-0105 (NPDES Permit No. CAS004004). The County MS4 Permit requires priority projects to infiltrate, harvest and use, evapotranspire, or biotreat/biofilter, the 85th percentile of a 24-hour storm event (Design Capture Volume [DCV]).

The permit lists allowable and unallowable discharges and requires implementation of LID infrastructure, which are engineered facilities that are designed to retain and/or biotreat runoff on the Project site. Projects that qualify as a development or redevelopment project, which includes the proposed Project as specified by criteria in the County MS4 Permit, are required to develop a site-specific LID plan to reduce the discharge of pollutants in runoff. The LID plan is required to be approved prior to the issuance of a building or grading permit, and post-construction BMPs are required to be implemented.

5.5.3 ENVIRONMENTAL SETTING

5.5.3.1 Overview

The Project site has been utilized for oil production since approximately 1923 and contains over 100 oil wells that consist of active, idle, plugged, and canceled wells. The wells are productive at approximately 4,500 feet below ground surface (bgs) (Appendix J). In addition, the site includes one single-story office building on the western edge of the site and a canopy structure to the northeast of the building that is used to cover construction equipment.

Oil wells have the potential to pose environmental concerns due to the potential impacts of petroleum hydrocarbons and VOCs to the deep groundwater aquifers, soil, and soil vapor. According to the American Lung Association, VOCs are gases emitted into the air, typically from gasoline, diesel emissions, wood burning, oil and gas extraction and processing, or industrial emissions. VOCs generally harm the eyes and

respiratory system, although more toxic VOCs may cause damage to the nervous system and other organs with prolonged contact or exposure (American Lung Association, 2024).

During oil well drilling of this type, it was common practice to deposit the drilling cuttings in a large excavation near the location of the well. The drilling cuttings could potentially contain elevated levels of crude oil, petroleum hydrocarbons, VOCs, metals, and undisclosed proprietary chemicals.

The Project site is located in an area that has historically been used for oil production, as evidenced by the numerous oil wells located on the surrounding properties. Oil wells have the potential to emit methane and H₂S gasses that can migrate through geologic materials and/or pathways such as old oil wells, fissures, and fractures in underlying geologic formations (Appendix J).

The City's Fire Department has a Hazardous Materials Response (HazMat) Team that are Hazardous Materials Specialists and the Fire Department meets the equipment standards of a Type II HazMat Team and can conduct field testing, air monitoring, sampling, radiation monitoring and detection, chemical protective clothing, decontamination, communication, and respiratory protection. The HazMat Team responds to hazardous materials incidents of varying levels of complexity, from small spills of vehicle fluids, paint products, or other household consumer products to large releases of industrial chemicals that pose a major hazard to life, environment, and property (GP Draft EIR p. 4.15-5).

5.5.3.2 Project Site Testing

The Phase II subsurface investigation completed in March 2023 and February 2024, included a geophysical survey and soil and/or soil gas borings.

Total Petroleum Hydrocarbons

The Centers for Disease Control and Prevention Agency for Toxic Substances and Disease Registry describes that total petroleum hydrocarbons (TPH) is a term used to describe a broad family of several hundred chemical compounds that originally come from crude oil. In this sense, TPH is really a mixture of chemicals. TPH released to the soil may move through the soil to the groundwater. Some TPH compounds can affect human central nervous systems causing headaches and dizziness at high levels other compounds can cause a nerve disorder called "peripheral neuropathy," consisting of numbness in the feet and legs. Also, TPH compounds can cause effects on the blood, immune system, lungs, skin, and eyes; thus, TPH is considered a hazardous substance.

The 2023 testing of the Project site detected total petroleum hydrocarbons as diesel and oil (TPH-d and TPH-o, respectively) in two samples exceeding applicable Environmental Screening Levels (ESLs). These borings include Boring B9 located on the west side of the site in the vicinity of a cluster of active oil wells and boring location B20 on the east side of the site to the north of a cluster of active oil wells. The impacts at Boring B9 were detected at 10 feet bgs, but not at 20 feet bgs, 25 feet bgs, or within step out borings; and thus, are considered limited in nature (Appendix K).

Additional testing that was completed in February 2024 identified TPH-g (gasoline), TPH-d and TPH-o in soil samples at concentrations exceeding the laboratory reporting limits (RLs). The detected concentration of TPH-d in sample B45-10 was 3,710 milligrams per kilogram (mg/kg) which exceeds the commercial/industrial ESL of 1,200 mg/kg. This exceedance was identified at 10 feet in depth, but not at 12 feet in depth, and not within step out borings. Thus, the additional testing identified that the TPH-d impacts in the area appear to be limited in nature.

This finding is consistent with previous studies for the adjacent site that is part of the same historic oil field, which identified small areas where impacts to soil by TPH have occurred. In December 2017, two remedial

excavations that were limited in nature were conducted on the adjacent property to remove soil that exceeded the TPH screening threshold. After which a No Further Action letter was received from the City of Santa Fe Springs Fire Department (Waterstone Environmental, Inc., 2022). Also, previous inspections of the open pits and stockpiles of soil and construction debris associated with excavations being done at the adjacent site that is part of the same historic oil field, during abandoning, re-abandoning to current standards, or cutting and capping the non-active oil wells indicated that operating wells and associated piping observed were very clean and well maintained, and no crude oil spills or other chemical spills to soil were noted. None of the oil well heads examined showed stained soil or oil at the surface (Waterstone Environmental, Inc., 2022). As these wells are part of the same oilfield and historically identified by the same address, it is assumed that similar conditions would exist during the well abandonment activities for the proposed Project.

Arsenic

Arsenic was detected at concentrations above the applicable screening level and background concentration in the northwest, northeast, southeast, and south portions of the site; with the highest concentration of arsenic located in northeast portion of the site. Seven of the analyzed soil samples detailed in the 2024 Phase II testing (B35-5, B41-14, B43-5, B58-5, B58-10, B58-15, and B60-18) exceeded the DTSC calculated background concentrations from 12.4 to 33 mg/kg.

VOCs

Benzene was detected in soil gas samples at concentrations exceeding applicable screening levels. The 2024 Phase II testing identified concentrations of benzene ranging from 10 to 370,000 micrograms per cubic meter (mg/m³) exceeding the commercial/industrial soil gas screening level (SGSL) of 14 mg/m³ in 20 of the analyzed soil gas samples. Detected concentrations of ethylbenzene ranged from 80 to 2,900 mg/m³ exceeding the commercial/industrial SGSL of 163.33 mg/m³ in five of the analyzed soil gas samples. None of the remaining VOCs were detected in the analyzed soil gas samples above applicable screening levels. The VOCs tested onsite are associated with oil and gasoline, such as benzene, bromomethane, toluene, and ethylbenzene.

Methane Gas

Methane gas which percolates from subsurface geological formations and subsurface decomposition of organic materials to the atmosphere is a natural phenomenon. Although it is typically harmless, in high enough concentrations, between 50,000 parts per million and 150,000 parts per million by volume in the presence of oxygen, methane can be explosive. In addition, at high concentrations methane may reduce the presence of oxygen, causing suffocation (Jo J.Y. et. al, 2013). The City of Santa Fe Springs Methane Zone Map identifies that the Project site is located within a Methane Zone (City of Santa Fe Springs, 2021).

The Phase II subsurface investigation completed in March 2023 identified that borings on the east side of the site had concentrations of methane that exceed the lower explosive limit (LEL). The February 2024 testing detected methane gas in 11 of the soil gas probes above the equipment detection limits. Methane concentrations in six of the soil gas probes (B45-SG12, B46-SG10, B48-SG10, B49-SG15, B50-SG5, and B52-SG5) exceeded the LEL of 50,000 parts per million by volume (ppmv).

Groundwater Contamination

The Omega Chemical Corporation was a refrigerant and solvent recycling company that operated in the City of Whittier between 1976 and 1991. As a result of business operations, spills and leaks of various chemicals contaminated the soil and groundwater beneath the facility with high concentrations of

tetrachloroethene (PCE) and trichloroethene (TCE). The contaminated area has been identified as a Superfund site pursuant to CERCLA. Prolonged exposure to these chemicals has been proven to cause severe long-term health effects.

As shown in the City's General Plan EIR Exhibit 4.9-4 (Contaminated Groundwater Plume), these chemicals have contaminated the groundwater and migrated southwest, creating a large plume beneath the City, including the Project site. In 2011, the USEPA selected an interim remedial action to contain and treat the large plume of contaminated groundwater with the overall objective to protect human health and the environment by preventing further spreading of the contaminated groundwater.

Numerous groundwater studies in the regional area of the oil field were performed between 1994 and 2010. Both EPA and the RWQCB agreed that, although groundwater beneath the oil fields in the region are impacted in some places, none of the impact is attributable to the oil field historical or current use (Waterstone Environmental, Inc., 2022). Similarly, the Phase I that was prepared for the site that is adjacent to the proposed Project (and part of the same oil field) determined that based on the extensive soil and groundwater studies performed for the Santa Fe Springs Oil Field, the proximity of adjacent site, the similar site oil field uses, and the decisions of the RWQCB, DTSC, and EPA, there are no groundwater issues associated with the site adjacent to the Project site based on its historical use for oil production (Waterstone Environmental, Inc., 2022). Groundwater in the Regional Water Quality (RWQCB) monitoring wells in the Project area in May 2022 had a depth to groundwater ranging from 105.71 to 111.43 feet below the ground surface (Appendix J).

Asbestos

Asbestos is a naturally-occurring fibrous material that was used as a fireproofing and insulating agent in building materials before such uses were banned by the USEPA in the 1970s, although some nonfriable use of asbestos in roofing materials still exists. Asbestos and asbestos-containing materials (ACMs) are considered both a hazardous air pollutant and a human health hazard. The risk to human health is from inhalation of airborne asbestos, which commonly occurs when ACMs are disturbed during such activities as demolition and renovation. The oil wells within the Project site were constructed from the 1920s onward when asbestos containing materials were commonly used. There is no known ACMs or lead-based paint at the Project site. However, for oilfield infrastructure that was installed prior to the 1980s, it is possible that ACMs (such as pipe wrap) and lead-based paint are present.

Lead

In 1978, the Consumer Product Safety Commission set the allowable lead levels in paint at 0.06 percent by weight in a dry film of newly applied paint. In the 1970s, the chief concern for lead-based paint was its cumulative effect on body systems, primarily when paint chips containing lead were ingested by children. Research in the early 1980s showed that lead dust is of special concern because the smaller particles are more easily absorbed by the body. Common methods of paint removal, such as sanding, scraping, and burning, create excessive amounts of dust. Lead dust is especially hazardous to young children because they play on the floor and engage in a great deal of hand-to-mouth activity, increasing their potential for exposure. Lead-based paints were commonly used in buildings built prior to 1970s; thus, due to the age of the onsite well infrastructure, it is possible that lead-based paint and other lead containing materials are present in the buildings on the Project site.

5.5.3.3 Setting Surrounding the Project Site

The Project site is located within an industrial area. The Phase I ESA prepared for the Project site (Appendix I) included searches of federal, State, and local databases that identified hazardous materials concerns on

sites within the vicinity of the Project site. The adjoining properties to the north, northwest, south, and west were identified with the following labels related to their database listings: Hazardous Waste Information System (HAZNET), FINDS/FRS, Cleanup Sites, CERS Haz, Resource Conservation and Recovery Act-Non-Generator (RCRA-NON GEN), Resource Conservation and Recovery Act- Treatment, Storage, and/or Disposal (RCRA-TSD), Emissions, Historical Hazardous Substance Storage Information Database (HHSS), Historic Tank, and California Hazardous Material Incident Report System (CHMIRS). These listings are related to similar oil, gas, and hazardous materials uses.

Schools

The Project site is not located within one-quarter mile from an existing or proposed school. The closest schools to the Project site include:

- Rancho Santa Gertrudes Elementary School, located at 11233 Charlesworth Road, Santa Fe Springs, approximately 1.2 miles from the Project site.
- Jersey Avenue Elementary School, located at 9400 Jersey Avenue, Santa Fe Springs, approximately 1.4 miles from the Project site.
- South Whittier Intermediate/Richard Graves Middle School, located at 13243 Los Nietos Road, Whittier, approximately 1.9 miles from the Project site.

Airports

The Fullerton Airport is located approximately 10.6 miles southeast of the City and El Monte Airport is located approximately 13.9 miles north of the center of the City. The Project site does not fall within the Planning Boundary/Airport Influence Area for either airport.

Wildfire

According to the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zone Maps, the City is not located in an area of high fire threat (CAL FIRE, 2024). Because Santa Fe Springs is an urbanized community, structural fires rather than wildland fires represent the greatest fire risk.

5.5.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

HAZ-1	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
HAZ-2	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;
HAZ-3	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
HAZ-4	Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment;
HAZ-5	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, result in a safety hazard or excessive noise for people residing or working in the project area;

- HAZ-6 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
- HAZ-7 Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

5.5.5 METHODOLOGY

The Project site was evaluated for the presence of hazardous substances that, if present in sufficient concentrations, could result in impacts to human health of the environment if the proposed Project is implemented. Likewise, the Project's use, disposal, storage, and other handling of hazardous materials was evaluated for potential release and impacts to humans and the environment. The qualitative analysis herein focuses on potential public safety and environmental hazards impacts, including the use, disposal, transport, or management of hazardous or potentially hazardous materials resulting from the construction and operation of the Project.

Information for this section was obtained, in part, from the Phase I ESA (Appendix I), the Phase II SIR (Appendix J), and the Additional Subsurface Testing (Appendix K) prepared for the Project site. The Phase I ESA is based on reviews of historical aerial photographs, historical topographic maps, Environmental Data Resources (EDR) database records, city directories, historical site occupants, historical site ownership records, site visits, and/or interviews of owners and tenants of the Project site. The Phase II SIR and Additional Subsurface Testing is based on the results of soil, gas, and geophysical investigations conducted on the Project site.

5.5.6 ENVIRONMENTAL IMPACTS

IMPACT HAZ-1: THE PROJECT WOULD NOT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS.

Less Than Significant with Mitigation Incorporated. A hazardous material is typically defined as any material that due to its quantity, concentration, or physical or chemical characteristics, poses a significant potential hazard to human health and safety or the environment if released. Hazardous materials may include, but are not limited to hazardous substances, hazardous wastes, and any material that would be harmful if released. As previously described, the City Fire Department is the CUPA that coordinates regulatory programs that regulate use, storage, and handling of hazardous materials, including Hazardous Materials Business Plans.

Construction

The proposed construction activities would involve the routine transport, use, and disposal of hazardous materials such as paints, solvents, oils, and grease, during construction activities. In addition, hazardous materials would routinely be needed for fueling and servicing construction equipment on the site. These types of materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by federal and State regulations that are implemented by the City during building permitting for construction activities.

As part of Project construction, on-site oil wells would be abandoned and capped. Abandonment of the oil wells would be conducted pursuant to the requirements listed under Sections 117.127, 117.129, and 117.130 of the Santa Fe Springs Municipal Code (included as Plan, Policy, or Program [PPP] HAZ-5 through PPP HAZ-7, in Section 5.5.8, *Existing Regulations and Plans, Programs, or Policies*). Abandonment would occur

pursuant to the oversight and requirements of the California Department of Conservation, Geologic Energy Management Division (CalGEM). In addition, CalGEM inspections and monitoring of all of the existing abandoned wells onsite would occur as necessary pursuant to CCR Title 14 Section 1723, as detailed previously.

Construction contractors would be required through City permitting to comply with federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous materials. Applicable laws and regulations include CFR, Title 29 - Hazardous Waste Control Act; CFR, Title 49, Chapter I; and Hazardous Materials Transportation Act requirements as imposed by the USDOT, CalOSHA, CalEPA, DTSC, and the City Fire Department as the CUPA. Additionally, construction activities would require a Stormwater Pollution Prevention Plan (SWPPP), which is mandated by the National Pollution Discharge Elimination System (NPDES) General Construction Permit and enforced by the Los Angeles RWQCB. The SWPPP would include strict on-site handling rules and best management practices (BMPs) to minimize potential adverse effects to workers, the public, and the environment during construction, including, but not limited to:

- Establishing a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Following manufacturers' recommendations on the use, storage, and disposal of chemical products used in construction;
- Avoiding overtopping construction equipment fuel tanks;
- Properly containing and removing grease and oils during routine maintenance of equipment; and
- Properly disposing of discarded containers of fuels and other chemicals.

Implementation of the SWPPP, as confirmed through the City's permitting process would limit potentially significant hazards from runoff of contaminated materials during construction to a less-than-significant level.

Contaminated Soils

As described previously, the Phase I ESA, Phase II SIR, and Additional Subsurface Investigation Report found TPH and VOCs at levels exceeding the commercial/industrial ESLs, and arsenic levels exceeding background concentrations. In addition, areas of contaminated soils and contaminated oil infrastructure materials may need to be disposed of during the CalGEM well inspection and well closure process.

The contaminated soil and oil well materials would be removed and disposed of during construction of the proposed Project. The Project would be required to implement SCAQMD Rule 1166 and SCAQMD Rule 1466 related to excavating and grading soil containing VOC and arsenic, along with the CalOSHA hazardous waste materials handling regulations, and the sections of the California Health and Safety Code, which are described above in the Regulatory Setting. These requirements were developed to protect human health and the environment from the hazards associated with exposure. In addition, due to the potential for other areas of contaminated soils or well materials onsite, a qualified consultant would be required to prepare and implement a Soil Management Plan (SMP), per SCAQMD Rule 1166 (included as PPP HAZ-1) and Los Angeles RWQCB requirements, which is included as Mitigation Measure HAZ-1 to be implemented during earthwork and grading to identify soils that are hazardous and require offsite disposal.

The SMP would require handling of contaminated materials be conducted pursuant to existing SCAQMD, RWQCB, and DTSC standards, soil sampling to ensure non-reusable contaminated soils are removed and that applicable USEPA and/or DTSC Screening Levels are not exceeded, and that a certified hazardous waste hauler remove and transport all hazardous materials, as needed, per California Hazardous Waste Regulations to a landfill permitted by the State to accept hazardous materials. Excavated soil containing hazardous substances would be classified as a hazardous waste if they exhibit the characteristics of ignitability, corrosivity, reactivity, or toxicity (CCR, Title 22, Division 4.5, Chapter 11, Article 3). The SMP would detail hazardous materials excavation and disposal methods and requirements pursuant to the

regulation of Title 8 of the California Code of Regulations (CalOSHA) and DTSC that regulates the removal, transportation, and disposal of hazardous waste to protect human health and the environment. The SMP would be submitted to the Santa Fe Springs Building Department prior to the issuance of a grading permit and would be implemented during grading activities.

In addition, a Health and Safety Plan (HSP) would be required to be approved by the Santa Fe Springs Fire Department prior to the issuance of a grading permit or other ground disturbing activities (included as Mitigation Measure HAZ-2) and implemented pursuant to OSHA Safety and Health Standards (29 Code of Federal Regulations [CFR] 1910.120). The HSP would outline health and safety requirements to minimize worker and public exposure to hazardous materials during construction, including vapor, water, and soil contamination. The HSP shall provide compliance with OSHA Safety and Health Standards and provide procedures in the event of release or human contact with hazardous materials during all construction activities. In the event that elevated levels of subsurface gases are encountered during grading and excavation, the HSP would address potential vapor encroachment from soil contamination or oil well infrastructure within and near the Project site. Gas monitoring devices shall be in place to alert workers in the event elevated gas or other vapor concentrations occur when soil excavation is being performed. Contingency procedures shall be in place in the event that elevated gas concentrations are detected, such as the mandatory use of personal protective equipment, evacuation of the area, and/or increasing ventilation within the immediate work area. Workers shall be trained to identify exposure symptoms and implement alarm response.

Therefore, with implementation of Mitigation Measures HAZ-1 and HAZ-2 and compliance with SCAQMD Rules 1166 and 1466 (included as PPP HAZ-1 and PPP HAZ-2), OSHA Safety and Health Standards (29 Code of Federal Regulations 1910.120), and CalOSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719), that would be verified by the City during Project permitting and inspections, impacts related to transport, use, or disposal of contaminated materials during construction would be less-than-significant.

Operation

The Project site would be developed as a warehouse, operations of which would generally involve limited quantities of hazardous materials such as diesel, automobile gas, automobile oil, cleaning materials, paints, solvents, and pesticides. Normal routine use of these products would not result in a significant hazard to residents or workers in the vicinity of the proposed Project. During proposed Project operations, trucks would travel to and from the Project site to pick up or drop off goods at loading docks. No fueling, maintenance, or other industrial activity would occur on the Project site.

Should any future business that occupies the Project site handle acutely hazardous materials (as defined in Section 25500 of California Health and Safety Code, Division 20, Chapter 6.95) the business would require a permit from the City Fire Department as the CUPA. Such businesses are also required to comply with California's Hazardous Materials Release Response Plans and Inventory Law, which requires immediate reporting to the City Fire Department as the CUPA and the State Office of Emergency Services regarding any release or threatened release of a hazardous material, regardless of the amount handled by the business. Any oil or gas spills from the incoming trucks would be reported, cleaned, and disposed of pursuant to City Fire Department requirements.

The routine transport, use, and disposal of acute hazardous materials is not anticipated during operations, and compliance with existing laws and regulations governing routinely used hazard and hazardous materials would reduce potential impacts related to less-than-significant.

IMPACT HAZ-2: THE PROJECT WOULD NOT 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.

Less Than Significant Impact with Mitigation Incorporated.

Construction

As described previously, the onsite oil wells would be abandoned and capped during construction, which would be conducted pursuant to Sections 117.127, 117.129, and 117.130 of the Santa Fe Springs Municipal Code (included as PPP HAZ-5 through PPP HAZ-7) and the permitting and inspection requirements of CalGEM. Construction of the proposed Project would involve the limited use and disposal of hazardous materials. Equipment that would be used in construction of the proposed Project has the potential to release gas, oils, greases, solvents, and spills of paint and other finishing substances. However, the amount of hazardous materials on site would be limited, and construction activities would be required to adhere to all applicable regulations regarding hazardous materials storage and handling, as well as to implement construction BMPs (through implementation of a required SWPPP implemented by City conditions of approval) to prevent a hazardous materials release and to promptly contain and clean up any spills, which would minimize the potential for harmful exposures. Upon compliance with existing laws and regulations, which are mandated by the City through construction permitting, the proposed Project's construction-related impacts would be less-than-significant.

Contaminated Soils

The Phase I ESA, Phase II ESA, and Additional Subsurface Investigation Report found TPH and VOCs at levels exceeding the commercial/industrial ESLs, and arsenic levels exceeding background concentrations. It is possible that other subsurface areas of contaminated soils exist that could release hazardous vapors. Excavated soil containing hazardous substances and materials would be classified as a hazardous waste if they exhibit the characteristics of ignitability, corrosivity, reactivity, or toxicity (CCR, Title 22, Division 4.5, Chapter 11, Article 3). State and federal laws require detailed planning to ensure that hazardous materials are properly handled, used, stored, and disposed of, and in the event that such materials are accidentally released, to prevent or to mitigate injury to health or the environment. These regulations include, but are not limited to, the federal RCRA, the Occupational Safety and Health Act that is implemented by OSHA, and the HMTA. Additionally, the California Integrated Waste Management Board and the RWQCB specifically address management of hazardous materials and waste handling in their adopted regulations (CCR, Title 14 and CCR, Title 27).

Therefore, due to the identification of TPH, arsenic, and VOCs in onsite soils, preparation and implementation of a SMP (through Mitigation Measure HAZ-1) for excavation, grading, and redevelopment activities pursuant to standard regulatory requirements would be required. As previously described, the SMP requires handling of contaminated soils be completed pursuant to existing SCAQMD Rules 1166 and 1466 (included as PPP HAZ-1 and PPP HAZ-2) and Los Angeles RWQCB standards and conduction of soils sampling and testing to ensure all contaminated soils within Project boundary are removed. A certified hazardous waste hauler is required to remove and transport all impacted soil and other potentially hazardous materials per California Hazardous Waste Regulations to a local landfill permitted by the State to accept the materials. In addition, an HSP per OSHA requirements is required (through Mitigation Measure HAZ-2) to implement health and safety requirements to minimize worker and public exposure, and provide response to release and exposure, to hazardous materials during construction, including contaminated soils and vapors that could emanate from contaminated soils. Therefore, with implementation of Mitigation Measures HAZ-1 and HAZ-2, compliance with SCAQMD Rules 1166 and 1466 (included as PPP HAZ-1 and HAZ-2), OSHA Safety and Health Standards (29 Code of Federal Regulations 1910.120), CalOSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719), and Municipal Code requirements (included as PPP HAZ-5 through PPP HAZ-7) that would be verified through

the City's development permitting process, potential impacts related to significant hazard to the public or environment through the reasonably foreseeable release of contaminated soils or potential vapors from contaminated soils would be less than significant.

Contaminated Groundwater

As shown in the City's General Plan EIR Exhibit 4.9-4 (Contaminated Groundwater Plume), the Project site overlies a contaminated groundwater plume identified as a Superfund site pursuant to CERCLA. The contaminated groundwater plume containing tetrachloroethene (PCE) and trichloroethene (TCE) is under remedial action by the USEPA. However, groundwater in the RWQCB monitoring wells in the Project area in May 2022 had a depth to groundwater ranging from 105.71 to 111.43 feet below the ground surface (Appendix J). As stated in the Preliminary Geotechnical Investigation (Appendix E), groundwater was not encountered during the soil borings, which reached a maximum depth of 51.5 feet below the existing ground surface. Excavation for the proposed Project is anticipated to reach depths of approximately 15 feet below the ground surface, which would not encroach into groundwater; and there is no potential for contaminated groundwater to be encountered during construction.

Although not anticipated, should Project excavation encounter contaminated water, the proposed Project construction would be required to incorporate contaminated dewatering measures in compliance with the Groundwater Discharge Permit (General NPDES Permit No. CAG994004). This permit would require testing and treatment as necessary for water encountered prior to release to surface waters to ensure that discharges do not contain pollutants. Compliance with the requirements of the Groundwater Discharge Permit, which would be implemented through the Los Angeles RWQCB and the City's development permitting process, would ensure that potential impacts related to a significant hazard to the public or environment through the reasonably foreseeable release of contaminated water would be less than significant.

Asbestos Containing Materials

The existing materials in the Project area date back to a period when many structures were constructed with what are now recognized as hazardous building materials, such as lead and asbestos. Demolition and removal of these older structures could result in the release of hazardous materials. However, asbestos abatement contractors must follow State regulations contained in California Code of Regulations Section 1529 and Sections 341.6 through 341.14 as implemented by SCAQMD Rule 1403 to ensure that asbestos removed during demolition and removal of the existing oil well infrastructure is transported and disposed of at an appropriate facility. The contractor and hauler of the material are required to file a Hazardous Waste Manifest which details the hauling of the material from the site and the disposal of it. Section 19827.5 of the California Health and Safety Code requires that local agencies not issue demolition permit until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. These requirements are included as PPP HAZ-3 to ensure that the Project applicant submits verification to the City that the appropriate activities related to asbestos have occurred, which would reduce the potential of impacts related to asbestos to a less than significant level.

Lead Based Materials

Lead-based materials may also be located within existing structures in the Project area. The lead exposure guidelines provided by the United States Department of Housing and Urban Development provide regulations related to the handling and disposal of lead-based products. Federal regulations to manage and control exposure to lead-based paint are described in Code of Federal Regulations Title 29, Section 1926.62, and State regulations related to lead are provided in the California Code of Regulations Title 8 Section 1532.1, as implemented by CalOSHA. These regulations cover the demolition, removal, cleanup, transportation, storage and disposal of lead-containing material. The regulations outline the permissible

exposure limit, protective measures, monitoring and compliance to ensure the safety of construction workers exposed to lead-based materials. CalOSHA's Lead in Construction Standard requires project applicants to develop and implement a lead compliance plan when lead-based paint would be disturbed during construction or demolition activities. The plan must describe activities that could emit lead, methods for complying with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. In addition, CalOSHA requires 24-hour notification if more than 100 square feet of lead-based paint would be disturbed. These requirements are included as PPP HAZ-4 to ensure that the Project applicant submits verification to the City that the appropriate activities related to lead have occurred, which would reduce the potential of impacts related to lead-based materials to a less-than-significant level.

Operation

The proposed Project would develop light industrial warehouses on the site. Operation of the proposed Project is not anticipated to require regular use of hazardous materials. Limited quantities of diesel, automobile gas, automobile oil may be present on site from the hauling trucks. However, no fueling, maintenance, or other industrial activity would occur on the Project site. The proposed warehouse buildings would utilize limited volumes of cleaners, paints, and other typical office and consumer products that would not result in a significant hazard. In addition, development of the proposed Project would require a water quality management plan (WQMP) in compliance with the Los Angeles County MS4 Permit (Order No. R4-2012-0175-A01), as detailed in Section 5.6, *Hydrology and Water Quality*. BMPs would be incorporated in the WQMP that would protect human health and the environment should any accidental spills or releases of hazardous materials occur during operation of the proposed Project. As previously described, spills of hazardous materials would be required to be reported, cleaned, and disposed of in compliance with City Fire Department, State, and federal regulations. Therefore, proposed warehouse operations would not result in a significant hazard to the public or the environment through reasonably foreseeable upset and accident involving hazardous material. Impacts related to hazardous materials from operation of the proposed Project would be less than significant.

Methane Hazard Zone

As detailed previously, the proposed Project is located within a Methane Hazard Zone and methane gas levels are elevated due to the oil well uses on the site and in the surrounding area. Construction of impervious surfaces can affect methane gas migration and proposed Project buildings with confined spaces, could pose a potential for methane buildup, resulting in a possible hazardous condition, as previously described. However, the proposed Project would be required to comply with the City's Municipal Code Section 117, et.al. requirements (included as PPP HAZ-8) related to methane gas testing and mitigation systems, which are mandated based on the volume of methane gas identified during onsite testing and design of proposed structures, prior to receipt of building permits. The Municipal Code prescribes the minimum methane mitigation systems depending on the concentration and pressure of the methane present at the site. Each component of the methane systems would be required to be constructed of an approved material and would be required to be installed in accordance with the Methane Mitigation Standards, as reviewed and approved by the City's Fire Department, that would reduce potential impacts to a less than significant level. These vapor barriers would also be effective for mitigation of any VOCs that might be present. Thus, compliance with regulatory requirements would reduce the potential for exposure of people to substantial volumes of methane gas and VOCs that could result in a significant hazard to the public or environment. Therefore, impacts would be less than significant.

IMPACT HAZ-3: THE PROJECT WOULD NOT EMIT HAZARDOUS EMISSIONS OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL.

Less Than Significant Impact. The Project site is not located within 0.25-mile from an existing or proposed school. The closest school to the Project site is the Rancho Santa Gertrudes Elementary School located 1.2 miles from the Project site. Therefore, impacts would be less than significant.

IMPACT HAZ-4: THE PROJECT WOULD NOT 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, CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT.

Less Than Significant Impact. The Phase I Environmental Site Assessment (Appendix I) that was conducted included database searches, including the State Water Resources Control Board (SWRCB) GeoTracker website or the DTSC EnviroStor websites, to determine if the Project site is identified as a hazardous materials site. The record searches determined that although the site has a history of various uses and identified as previously generating hazardous wastes and is within an area overlying Superfund site clean-up activities, the Project site is not included on a Cortese List of hazardous materials sites pursuant to Government Code Section 65962.5.

Also, although the Phase I Environmental Site Assessment (Appendix I) and EnviroStor website identified offsite sources of contamination, such as oil wells, chemicals from previous industrial uses, and contaminated soils, it did not identify any adjacent sites that are included on a Cortese List of hazardous materials sites compiled pursuant to Government Code Section 65962.5 that could result in impacts related to the proposed Project. As a result, impacts from implementation of the proposed Project related to hazards from being located on or adjacent to a hazardous materials site included on a Cortese List would be less than significant.

IMPACT HAZ-5: THE PROJECT WOULD NOT BE 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, RESULT IN A SAFETY HAZARD OR EXCESSIVE NOISE FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA.

No Impact. The Fullerton Airport is located approximately 10.6 miles southeast of the City and El Monte Airport is located approximately 13.9 miles north of the center of the City. The Project site does not fall within the Planning Boundary/Airport Influence Area for either airport, and the site is not within a noise contour or safety hazard area related to an airport. Therefore, no impacts related to airport safety hazards would occur.

IMPACT HAZ-6: THE PROJECT WOULD NOT IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN

No Impact.

Construction

The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site, and would not restrict access of emergency vehicles to the Project site or adjacent areas. The installation of the new driveway and connections to infrastructure systems that would be implemented during construction of the proposed Project would not require closure of Hawkins Street or adjacent areas. Any temporary lane closures needed for utility connections or driveway construction would be required to implement appropriate measures to facilitate vehicle circulation, as included within construction permits. Thus,

implementation of the Project through the City's permitting process would ensure existing regulations are adhered to and that construction-related emergency access or evacuation impacts would not occur.

Operation

Direct access to the Project site would be provided by the proposed driveway at the end of Hawkins Street. The Project driveway and internal circulation would be required through the City's permitting procedures to meet the City's design standards to ensure adequate emergency access and evacuation. The Project is also required to provide fire suppression facilities (e.g., hydrants and sprinklers) in conformance with City Fire Department standards. The City's Building Department would review the development plans prior to approval to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). Therefore, operation of the proposed Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan.

IMPACT HAZ-7: THE PROJECT WOULD NOT EXPOSE PEOPLE OR STRUCTURES, EITHER DIRECTLY OR INDIRECTLY TO A SIGNIFICANT RISK OF LOSS, INJURY, OR DEATH INVOLVING WILDLAND FIRES.

No Impact. According to CAL FIRE's Fire Hazard Severity Zone Maps, the City is not located in an area of high fire threat (CAL FIRE, 2020). Because Santa Fe Springs is an urbanized community, structural fires rather than wildland fires represent the greatest fire risk. The proposed Project is within an urban area that is adjacent to existing industrial uses and would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. In addition, the proposed Project would be constructed in compliance with the California Fire Code and California Building Code. The safety measures under the California Fire Code include ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system, and sealing any gaps around doors, windows, eaves, and vents to prevent intrusion by flame or embers. The California Building Code requirements include CCR Title 24, Part 2, which provides specific requirements related to exterior fire exposure. Compliance with existing regulatory requirements for implementation of fire protection measures (e.g., ignition-resistant construction materials and measures) would further reduce impacts associated with fire spread. Thus, the proposed Project would not result in a significant impact related to exposure of people or structures to significant risk involving wildland fires.

5.5.7 CUMULATIVE IMPACTS

Cumulative land use changes within the City of Santa Fe Springs would have the potential to expose future area residents, employees, and visitors to chemical hazards through redevelopment of sites and structures that may contain hazardous materials. Thus, the proposed Project's contribution to cumulative impacts to hazards and hazardous materials was analyzed in context with past and foreseeably future projects in the City that are similarly affected by hazardous soil, VOCs, and methane gas conditions.

The severity of potential hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. As shown in Figure 5-1, *Cumulative Projects*, in Section 5.0, *Environmental Impact Analysis*, of this Draft EIR, the closest cumulative project is adjacent to the Project site.

The commencement of construction of the adjacent cumulative project is unknown; however, it is possible that construction activities involving hazardous materials from both the proposed Project and the adjacent cumulative project or other nearby cumulative projects would occur simultaneously that could have the potential to cumulatively contribute to an impact. However, all hazardous materials users and transporters, as well as hazardous waste generators and disposers are subject to regulations that require proper

transport, handling, use, storage, and disposal of such materials to ensure public safety, which are verified by the City during the construction and development permitting process.

Thus, if hazardous materials are found to be present on any of the cumulative or future project sites, appropriate remediation activities would be required pursuant to standard federal, State, and regional regulations that would reduce potential impacts, such as the activities which would be done by the proposed Project. In addition, compliance with SCAQMD Rule 1166 and OSHA Safety and Health standards would be implemented for the proposed Project to ensure that hazardous soil from the site would be handled and disposed of in a manner which would reduce the potential of the proposed Project to result in a hazard to the public or environment that could cumulatively combine. As such, the potential impacts from the proposed Project would not be cumulatively considerable.

5.5.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

Federal

- United States Code of Federal Regulations Title 42, Sections 6901 et seq.: Resource Conservation and Recovery Act
- United States Code of Federal Regulations Title 49, Parts 101 et seq.: Regulations implementing the Hazardous Materials Transportation Act (United States Code of Federal Regulations Title 49 Sections 5101 et seq.)
- United States Code of Federal Regulations Title 15, Sections 2601 et seq.: Toxic Substances Control Act
- US Environmental Protection Agency Asbestos Hazard Emergency Response Act, 40 United States Code of Regulations Section 763

State

- California Health and Safety Code Chapter 6.95 and 19 California Code of Regulations Section 2729: Business Emergency Plans and chemical inventory reporting
- California Occupational Safety and Health Administration Regulation 29, CFR Standard 1926.62
- California Code of Regulations Title 24, Part 2: California Building Code
- California Code of Regulations Title 24, Part 9: California Fire Code
- California Code of Regulations Title 8, Section 1532.1, Lead in Construction Standard
- California Code of Regulations Title 8, Section 1529: Asbestos
- Title 8 of the California Code of Regulations, Section 1532.1: Lead

Regional

- South Coast Air Quality Management District Rule 1403: Asbestos
- South Coast Air Quality Management District Rule 1466: Fugitive Dust Toxic Air Contaminants
- South Coast Air Quality Management District Rule 1166: VOCs

Local

- Santa Fe Springs Municipal Code Section 117.27 Criteria for Well Abandonment
- Santa Fe Springs Municipal Code Section 117.29 Requirements Prior to New Construction
- Santa Fe Springs Municipal Code Section 117.30 Abandoned Wells That Do Not Meet Current DOGGR Standards

- Santa Fe Springs Municipal Code Section 117.131 Requirements for a Soils Gas Study or Methane Mitigation System
- Santa Fe Springs Municipal Code Section 152.33 Extremely Hazardous Wastes

Plans, Programs, or Policies

The following Plans, Programs, or Policies (PPPs) that are listed below would reduce impacts related to hazards and hazardous materials. These actions will be included in the Project's Mitigation Monitoring and Reporting Program (MMRP):

PPP HAZ-1: SCAQMD Rule 1166. Prior to issuance of grading or excavation permits, the Project applicant shall submit verification to the City Building and Safety Division that it has applied for and obtained a SCAQMD Rule 1166 Contaminated Soil Mitigation Plan that includes but is not limited to the following, as required by SCAQMD. Monitor for VOC contamination at least once every 15 minutes commencing at the beginning of excavation or grading and record all VOC concentration readings. Handling VOC-contaminated soil at or from an excavation or grading site shall segregate VOC-contaminated stockpiles from non-VOC contaminated stockpiles such that mixing of the stockpiles does not take place. VOC-contaminated soil stockpiles shall be sprayed with water and/or approved vapor suppressant and cover them with plastic sheeting for all periods of inactivity lasting more than one hour. A daily visual inspection shall be conducted of all covered VOC contaminated soil stockpiles to ensure the integrity of the plastic covered surfaces. Contaminated soil shall be treated or removed from an excavation or grading site within 30 days from the time of excavation.

PPP HAZ-2: SCAQMD Rule 1466. Prior to issuance of grading or excavation permits for soil that contains the potential to contain applicable toxic air contaminants that have been identified as contaminant(s) of concern per SCAQMD Rule 1466, the Project applicant shall conduct continuous direct-reading near real-time ambient monitoring of PM₁₀. If the PM₁₀ concentration exceeds 25 micrograms per cubic meter, per SCAQMD Rule 1466 measurement requirements, the owner or operator shall cease on-site earth-moving activities, apply dust suppressant to fugitive dust sources, or implement other dust control measures as necessary, per SCAQMD Rule 1466 specifications, until the PM₁₀ concentration is equal to or less than 25 micrograms per cubic meter averaged over 30 minutes.

PPP HAZ-3: SCAQMD Rule 1403. Prior to issuance of demolition, grading, or excavation permits, the Project applicant shall submit verification to the City Building and Safety Division that an asbestos survey has been conducted at all existing buildings located on the Project site. If asbestos is found, the Project applicant shall follow all procedural requirements and regulations of South Coast Air Quality Management District Rule (SCAQMD) 1403. Rule 1403 regulations require that the following actions be taken: notification of SCAQMD prior to construction activity, asbestos removal in accordance with prescribed procedures, placement of collected asbestos in leak-tight containers or wrapping, and proper disposal.

PPP HAZ-4: Lead. Prior to issuance of demolition, grading, or excavation permits, the Project applicant shall submit verification to the City Building and Safety Division that a lead-based paint survey has been conducted at all existing building structures located on the Project site. If lead-based paint is found, the Project applicant shall follow all procedural requirements and regulations for proper removal and disposal of the lead-based paint. Cal-OSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, CCR Title 8, Section 1532.1 provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead.

PPP HAZ-5: Well Abandonment. Pursuant to Municipal Code Section 117.127, *Criteria for Well Abandonment*, a well shall be considered properly abandoned for the purpose of this section when all of the following events have occurred:

- A. If applicable, any holes associated with a well have been filled with native earth and compacted to a 90% compaction factor.
- B. The derrick and all appurtenant equipment thereto have been removed from the drill site. All drilling and production equipment, tanks, towers and other surface installations used in connection with the well shall have been removed from the drill site or tank farm site. The cleaning of the site shall comply with the regulations of Division of Oil, Gas and Geothermal Resources (DOGGR).
- C. All buried pipelines shall have been excavated and removed or, if approved by the Fire Chief, purged of all hydrocarbon substances and filled with water-base drilling mud or other inert materials. The surface of the land, insofar as practicable, has been left in a neat and orderly condition.
- D. The depth from ground level to the top of the well casing shall be a minimum of five feet and a maximum of 10 feet unless a different cut-off depth is approved by DOGGR.
- E. A permit to abandon the well shall be obtained from the Fire Department prior to abandonment. The Fire Chief or his designee shall witness the pouring of the last 25 feet of the cement well plug and the welding of a plate across the top of the well. The plate on the top of the abandoned well shall conform to current DOGGR requirements and include the date of abandonment. The Fire Chief or his designee shall inspect and certify in writing that the well has been properly abandoned in accordance with provisions of this section.
- F. A copy of the DOGGR Report of Well Abandonment or other final determination has been provided to the Fire Chief and the Director.

PPP HAZ-6: Prior to New Construction. Pursuant to Municipal Code Section 117.129, *Requirements Prior to New Construction*, prior to the issuance by the City of a building or grading permit for property upon which there are any active or abandoned wells, the applicant shall complete all of the following:

- A. Obtain a construction site well review from DOGGR.
- B. Conduct a soils gas study in accordance with § 117.131.
- C. Obtain a permit from the Fire Department to expose all former wells, survey their location and test each well for gas or fluid leaks under the supervision of an oil and gas professional authorized by the Fire Department. Conduct this leak test and submit results to the Fire Department.
- D. Provide a well access site map to the Planning Department for approval. The site map shall include all of the following:
 - 1. Detailed location of each well including the depth from ground level to the top of the well casing of each abandoned well in relation to finished grade.
 - 2. Demonstrate how vehicles and abandonment equipment will access each well from the public right-of-way.
 - 3. Demonstrate that adequate setbacks will be provided for setting up abandonment equipment around each well.
- E. Obtain a permit from the Fire Department for the installation of a vent cone and related equipment for all abandoned wells located below or in close proximity to the proposed new construction.
- F. Agree to implement all mitigation measures required by the Fire Chief including, but not limited to, installation and maintenance of methane barriers, vents/blowers, alarms and the like (collectively, "Methane Mitigation Systems").
- G. If applicant performs a leak test pursuant to § 117.129(C) and the test indicates the well is leaking, applicant shall abandon or reabandon the well pursuant to § 117.127.
- H. File an indemnity bond pursuant to Cal. Public Resources Code §§ 3204 or 3205.
- I. Execute and record against the property an environmental release and indemnity agreement providing that the property owner and his assignees, release, indemnify and hold harmless the city against any and all claims, obligations, and causes of action of any kind or nature whatsoever, known or unknown, for personal injury or death, property damage, economic loss, and fines and penalties. The City Attorney shall approve the form of the disclosure and indemnity agreement.

PPP HAZ-7: Reabandon Wells. Pursuant to Municipal Code Section 117.130, *Abandoned Wells That Do Not Meet Current DOGGR Standards*, if DOGGR determines that a well has not been abandoned to its current standards, the Director, in consultation with the Fire Chief, may conditionally authorize issuance of a building and/or grading permit for a property if the following conditions are met:

- (A) The applicant meets the requirements of § 117.129(A) through (I). For construction over an abandoned well, § 117.129(D) may be waived by the Director in consultation with the Fire Chief.
- (B) The applicant shall obtain, at his sole cost, a certified report from a California-licensed professional engineer or geologist qualified and experienced with oil well abandonment indicating that it is not reasonable or feasible for the applicant to do additional well abandonment work in order to meet current DOGGR abandonment standards. The engineer's or geologist's report shall:
 - (1) Demonstrate that, as abandoned, the well will not pose any significant risk to public health, safety, welfare or the environment.
 - (2) Demonstrate that (a) the well is a safe distance from any existing or proposed structures or improvements; and (b) in the event the Fire Department or DOGGR orders reabandonment of the well, the applicant has adequate access to the well. This requirement does not apply to construction over an abandoned well.
 - (3) Provide abandonment or mitigation measures that would be necessary to mitigate any long-term significant risks once the site is developed.
- (C) The applicant agrees to implement all methane mitigation systems required by the Fire Chief. The Fire Chief, in conjunction with the Director, is authorized to obtain expert analysis in order to determine whether the conditions identified in § 117.130 have been met. The cost of such expert analysis shall be paid by the applicant.

PPP HAZ-8: Methane Mitigation System. Pursuant to Municipal Code Section 117.131, *Requirements for a Soils Gas Study or Methane Mitigation System*, a soil gas investigation to identify the concentration of methane gas in the subsurface is required for sites within 500 feet of an existing or abandoned oil well. Based on the results of the soils gas monitoring or on information available on surrounding properties, property owners shall implement any other mitigation measures as required by the Fire Chief. Methane mitigation systems shall be required for any regulated construction if any of the following apply:

- (1) The initial monitoring reveals methane levels in excess of 25% of the lower explosive limit (i.e., 1.25% by volume in air or 12,500 ppm/v).
- (2) The regulated construction will impede access to an abandoned oil well.
- (3) Quarterly or annual monitoring reveals methane levels greater than 25% of the lower explosive limit (i.e., 1.25% by volume in air or 12,500 ppm/v).

The design of a methane mitigation system for property within the methane zone shall be in accordance with the requirements of the Los Angeles County Department of Public Works and City Fire Department and shall include permanent monitoring vapor probes above and below the barrier unless an alternative design is approved by the Fire Chief. Where gas detection systems are used, they shall be designed by and installed under the supervision of registered engineers. The design and installation shall be inspected and approved by the Fire Department.

In extraordinary cases, for example, where methane in excess of 25% of the lower explosive limit (i.e., 1.25% by volume in air or 12,500 ppm/v) can be demonstrated to be a non-repetitive incident, a registered petroleum engineer or other qualified persons may request a waiver by the Fire Chief for the installation of a methane mitigation system. The granting of the waiver shall be at the discretion of the Fire Chief.

PPP HAZ-9: Hazardous Wastes. Pursuant to Municipal Code Section 152.33, *Extremely Hazardous Wastes*, any storage, treatment, disposal, or transportation of extremely hazardous waste as defined in Cal. Health

and Safety Code § 25115, by the facility owner/operator shall be reported to the Director of Planning and Fire Chief at least 48 hours prior to such storage, treatment, disposal, or transportation.

PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Building and Safety Department with evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

PPP HYD-2: LID. Prior to the issuance of any grading permits, a completed Low Impact Development Plan (LID) shall be submitted to and approved by the City's Public Works Department. The LID shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.

5.5.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Thresholds HAZ-1 and HAZ-2 are potentially significant prior to mitigation. Impacts related to Thresholds HAZ-3 and HAZ-4 would be less than significant, and no impact related to Thresholds HAZ-5 through HAZ-7 would occur.

5.5.10 MITIGATION MEASURES

Mitigation Measure HAZ-1: Soil Management Plan (SMP). Prior to issuance of a grading or excavation permit a SMP shall be approved by the City of Santa Fe Springs Fire Department as the Certified Unified Program Agency (CUPA), with responsibility for implementing federal and State laws and regulations pertaining to hazardous materials management. The SMP shall implement SCAQMD Rule 1166, RWQCB water quality regulations, and the following measures as deemed appropriate by the City of Santa Fe Springs Fire Department for each Project grading or excavation permit.

- 1) **Preparation:** The following activities will be performed prior to the start of earth moving activities:
 - **Agency Notification:** At least 48 hours before the date of earth moving activities, the contact information for the environmental consulting project manager (a State of California Professional Geologist or Professional Engineer or supervised by one) will be provided to the CUPA via email along with a notification of the date that earthmoving operations and/or other preparation for redevelopment will begin.
 - **SMP Training:** The environmental consultant will provide a training session for all earth moving onsite personnel including superintendents. The training will ensure that all onsite personnel are familiar with the requirements of the SMP in an on-Site, pre-grading kick-off meeting.
 - **PID Rental:** A photo-ionization detector (PID) that shall be used to read concentrations of volatile organic compounds (VOCs) will be utilized by the environmental professional responsible for SCAQMD Rule 1166 permit monitoring.
- 2) **Field Identification Procedures:** Prior to grading or other earth moving activities, environmental consulting personnel shall train the earth moving superintendent in the recognition of impacted soil and the notifications required. When impacted soil is observed, the superintendent will notify the environmental consultant to visit the site to inspect the area. The superintendent shall also take digital photographs for email delivery to the environmental consultant. The superintendent shall communicate details regarding the potential environmental issue via telephone conversation immediately as practicable but not later than the end of the business day the potential environmental issue is

encountered. Excavation in the area of VOC impacted soils will cease until the environmental professional mobilizes to the Site to further inspect.

The pre-field training of earth moving personnel shall emphasize that any of the following observed conditions on the site will require notification to the superintendent (who will then communicate these conditions to the environmental consulting contact):

- **Discolored Soil:** Observation of soil that is discolored with black, dark, multi-colored, white, or other discoloration when compared to the surrounding material. This condition may be indicative of potential chemical impact by asbestos, metals-containing compounds and/or petroleum hydrocarbon compounds and is especially effective for identification of heavier end hydrocarbons such as those found in crude oil.
- **Odorous Soil:** Soil encountered that has a noticeable odor of anything other than a musty odor which is typically a result of mold (biological). This condition is indicative of potential chemical impact by volatiles and petroleum hydrocarbon compounds and is especially effective for identification of volatile compounds such as light end hydrocarbons or other crude oil components.
- **PID Use:** Training shall include the proper use, calibration, startup, and shutdown of a PID.
- **PID Readings Sustained over 50 parts per million (ppm) for more than 10 seconds at 3 inches above the soil surface:** If soil such as that described in 1 and 2 above is encountered, the superintendent shall take a reading with the PID and notify the environmental consultant of the location, soil observations, and PID readings. The environmental consultant may choose to inspect the area and compare the location with previous data to determine whether this is a new or known area. If readings over 50 ppm are sustained for more than 10 seconds 3 inches above the soil surface, this condition is indicative of potential chemical impact by VOCs. This field screening method will identify potential environmental issues related to diesel, gasoline, and volatile organic compounds.
- **Encounter of a previously unidentified feature:** Any underground features such as underground pipes, tanks (USTs), or clarifiers that are encountered (which, upon observation by the environmental consultant, is deemed to have potentially been used to contain liquids or exhibits staining) will require removal, soil sampling, sample analysis, and evaluation of analytical results by the oversight environmental professional pursuant to a permit from the Santa Fe Springs Fire Department.

3) Procedures Following Identification of a Potential Environmental Issue: If discolored and/or odorous or soil with PID readings exceeding a sustained reading of 50 ppm is encountered, the following procedure shall be followed:

- a. The earth moving superintendent will inform the environmental consultant project manager as soon as possible but not later than the end of the business day the potentially impacted soil is encountered.
- b. Cease excavation in area of impact to allow environmental professional to mobilize to the site to observe the condition and oversee the excavation of odorous and discolored soil for separate stockpiling with pile identified as to the location of the area it came from. Stockpiles will be placed on plastic sheeting to protect underlying soil. The stockpile will be sampled according to the protocols in the next section and covered with plastic sheeting pending analytical results.
- c. The environmental consultant personnel may visit the site to observe the potentially impacted soil and collect samples if necessary. If necessary, the environmental consultant personnel will supervise removal of the soil, agency notifications, and sample collection.
- d. The environmental consultant will perform the following:
 - a) Observation of the nature of and the condition of the area where the potentially impacted soil was found and comparison to site characterization and remediation data.
 - b) One sample of potentially impacted soil per 250 cubic yards of soil removed. Samples used to characterize soil stockpiles may be composited.
 - c) Soil samples from each impacted area will be analyzed for the following:
 - i. TPH – 8015M
 - ii. VOCs – 8260
 - iii. Title 22 metals

- iv. Samples from areas of unknown sources of TPH may also be analyzed for PCBs by EPA Method 8082 and for SVOCs by EPA Method 8270.
- e. As necessary, stockpiled soil that exceeds screening thresholds and cannot remain onsite shall be disposed of offsite according to all applicable regulations through oversight by the CUPA (Santa Fe Springs Fire Department) as documented in writing.
- f. Results of environmental oversight and performing the procedures of the SMP, including soil sampling results and analysis as well as the final disposition of sampled soils shall be provided in writing to the CUPA prior to issuance of additional construction permits.

Mitigation Measure HAZ-2: Health and Safety Plan (HSP). Prior to ground-disturbing activities, including well abandonment, grading, trenching, excavation, or structure demolition a HSP shall be approved by the City of Santa Fe Springs Fire Department as the Certified Unified Program Agency (CUPA), with responsibility for implementing federal and State laws and regulations pertaining to hazardous materials management. The Project Applicant and/or the construction contractor(s) shall retain a qualified professional to prepare a site-specific HSP in accordance with federal Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1910.120) and California OSHA regulations (8 CCR Section 5192). HSPs shall be a condition of the well abandonment, grading, construction, and/or demolition permit(s).

The HSP shall be implemented by the construction contractor to protect construction workers, the public, and the environment during all ground-disturbing activities from exposure to hazardous materials, including vapor and soil contamination. The HSP shall include, but not be limited to, the following elements:

- Designation of a trained, experienced site safety and health supervisor who has the responsibility and authority to develop and implement the site HSP.
- The HSP shall provide compliance with OSHA Safety and Health Standards and provide procedures in the event of release or human contact with hazardous materials during all construction activities.
- A summary of all potential risks to construction workers and maximum exposure limits for all known and reasonably foreseeable site chemicals.
- Specified personal protective equipment and decontamination procedures, if needed.
- Gas monitoring devices – A 4 or 5 gas meter capable of measuring methane, hydrogen sulfide, oxygen and carbon monoxide shall be on Site during all work in place pursuant to the Soil Management Plan (SMP) (Mitigation Measure HAZ-1) to alert workers in the event elevated gas or other vapor concentrations occur when soil excavation is being performed.
- In the event that elevated levels of subsurface gases are encountered during grading and excavation, the HSP shall address potential vapor encroachment from soil contamination or oil well infrastructure within and near the Project site and the environmental professional will be notified to respond to the Site.
- A requirement specifying that any site worker who identifies hazardous materials has the authority to stop work and notify the site safety and health supervisor.
- Contingency procedures shall be in place in the event that elevated gas concentrations are detected, such as the mandatory use of personal protective equipment, evacuation of the area, and/or increasing ventilation within the immediate work area. Workers shall be trained to identify exposure symptoms and implement alarm response.
- Emergency procedures, including the route to the nearest hospital.
- The requirement to prepare documentation showing that HSP measures have been implemented during construction (e.g., tailgate safety meeting notes with sign-up sheet for attendees, soils gas testing data).

5.5.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Upon implementation of Mitigation Measures HAZ-1, HAZ-2, and regulatory requirements, impacts related to Thresholds HAZ-1 and HAZ-2 would be less than significant. With implementation of mitigation, no significant and unavoidable impacts related to hazards and hazardous materials would occur.

5.5.12 REFERENCES

- American Lung Association. (2024). Volatile Organic Compounds. <https://www.lung.org/clean-air/indoor-air/indoor-air-pollutants/volatile-organic-compounds#:~:text=Volatile%20organic%20compounds%2C%20or%20VOCs%2C%20are%20gases%20that%20are%20emitted,they%20are%20in%20the%20air.>
- ATSDR (Agency for Toxic Substances and Disease Registry). (1999). *Public Health Statement for Total Petroleum Hydrocarbons (TPH)*. U.S. Department of Health and Human Services. <https://wwwn.cdc.gov/TSP/PHS/PHS.aspx?phsId=422&toxId=75#:~:text=TPH%20released%20to%20the%20soil,chemical%20properties%20of%20the%20compound>
- ATSDR (Agency for Toxic Substances and Disease Registry). (2020). *Toxicological Profile for Lead*. <https://wwwn.cdc.gov/TSP/ToxFAQs/ToxFAQsDetails.aspx?faqId=93&toxId=22>
- CAL FIRE . (2024). CAL FIRE Fire Hazard Severity Zone Maps. <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-maps-2022>
- City of Santa Fe Springs General Plan. (November 2021). Accessed: https://www.reimaginesantafesprings.org/files/managed/Document/152/PublicReviewDraftGeneralPlan_11-03-2021.pdf
- Santa Fe Springs General Plan and Targeted Zoning Code Update EIR. https://www.reimaginesantafesprings.org/files/managed/Document/155/Santa%20Fe%20Springs%20GPTZCU_DEIR_11032021.pdf
- City of Santa Fe Springs. 2024. *City of Santa Fe Springs Municipal Code*. https://codelibrary.amlegal.com/codes/santafesprings/latest/santafesprings_ca/0-0-0--1073665416
- Department of Toxic Substances Control (DTSC). 2024. EnviroStor database. <https://www.envirostor.dtsc.ca.gov/public/map/>
- City of Santa Fe Springs. (n.d.). Methane Zone Map. <https://goemsinc.com/Assets/City%20of%20Santa%20Fe%20Springs%20Methane%20Zone%20Map.pdf>
- Jo J.Y., Kwon Y.S., Lee J.W., Park J.S., Rho B.H., Choi W.I. (2013). *Acute Respiratory Distress Due to Methan Inhalation*. Retrieved February 16, 2024, from <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3617131/>
- Partner Engineering and Science, Inc. (2022). *Phase I Environmental Site Assessment*. **(Appendix I)**
- Partner Engineering and Science, Inc. (2023). *Phase II Site Investigation Report*. **(Appendix J)**
- Partner Engineering and Science, Inc. (2024). *Additional Subsurface Investigation Report*. **(Appendix K)**

Waterstone Environmental, Inc. (2022). *Phase I and Limited Phase II Environmental Assessment Report Subject Property Located at Northwest Corner of Telegraph Road and Santa Fe Springs Road APNs: 8005-015-047, 8005-015-048, 8005-015-049.*

South Coast Air Quality Management District (SCAQMD). (2011). *Rule 1166 Site Specific and Various Locations Soil Mitigation Plan.* [https://www.aqmd.gov/home/rules-compliance/compliance/rule-1166-site-specific-and-various-locations-soil-mitigation-plan#:~:text=Rule%201166%20%2D%20Volatile%20Organic%20Compound,volatile%20organic%20compounds%20\(VOCs\)](https://www.aqmd.gov/home/rules-compliance/compliance/rule-1166-site-specific-and-various-locations-soil-mitigation-plan#:~:text=Rule%201166%20%2D%20Volatile%20Organic%20Compound,volatile%20organic%20compounds%20(VOCs))

South Coast Air Quality Management District (SCAQMD). (2011). *Rule 1466 Control of Particulate Emissions from Soils With Toxic Air Quality Contaminants.* <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf?sfvrsn=25>

This page intentionally left blank.

5.6 Hydrology and Water Quality

5.6.1 INTRODUCTION

This section describes the existing hydrology and water quality conditions and potential impacts from implementation of the proposed Project. The analysis in this section is based, in part, on the following:

- *Santa Fe Springs General Plan 2040*, adopted in 2022.
- *Santa Fe Springs General Plan and Targeted Zoning Code Update Environmental Impact Report*, prepared by MIG, Inc, 2021.
- City of Santa Fe Springs Development Code.
- *City of Santa Fe Springs 2020 Urban Water Management Plan (UWMP)*.
- *Low Impact Development Plan*, Huitt Zoliars, July 2024 (Appendix F)

5.6.2 REGULATORY SETTING

5.6.2.1 Federal Regulations

Clean Water Act

The Clean Water Act (CWA) established the basic structure for regulating discharges of pollutants into “waters of the U.S.” The Act specifies a variety of regulatory and non-regulatory tools to sharply reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff. Key components of the Clean Water Act that are relevant to the proposed Project are:

- Sections 303 and 304, which provide for water quality standards, criteria, and guidelines. Section 303(d) requires the State to develop lists of water bodies that do not attain water quality objectives (are impaired) after implementation of required levels of treatment by point-source dischargers (municipalities and industries). Section 303(d) also requires that the State develop Total Maximum Daily Loads (TMDLs) for each of the listed pollutants. The TMDL is the amount of pollutant loading that the water body can receive and still be in compliance with water quality objectives. After implementation of the TMDL, it is anticipated that the contamination that led to the 303(d) listing would be remediated. Preparation and management of the Section 303(d) list is administered by the Regional Water Quality Control Boards (RWQCBs).
- Section 401 requires activities that may result in a discharge to a federal water body to obtain a water quality certification to ensure that the proposed activity would comply with applicable water quality standards.
- Section 402 regulates point- and nonpoint-source discharges to surface waters through the National Pollutant Discharge Elimination System (NPDES) program. In California, the State Water Resources Control Board (SWRCB) oversees the NPDES program, which is administered by the local RWQCBs. The NPDES program provides both general permits (those that cover a number of similar or related activities) and individual permits.

National Pollutant Discharge Elimination System Permit Program

The National Pollutant Discharge Elimination System (NPDES) permit program under the CWA controls water pollution by regulating point- and nonpoint-sources that discharge pollutants into “waters of the U.S.” California has an approved State NPDES program. The United States Environmental Protection Agency has

delegated authority for NPDES permitting to the SWRCB, which has nine regional boards. The Los Angeles RWQCB regulates water quality in Santa Fe Springs to the San Gabriel River. Discharge of stormwater runoff from construction areas of one acre or more requires either an individual permit issued by the RWQCB or coverage under the statewide Construction General Stormwater Permit for stormwater discharges (discussed below). Specific industries and public facilities, including wastewater treatment plants that have direct stormwater discharges to navigable waters, are also required to obtain either an individual permit or obtain coverage under the statewide General Industrial Stormwater Permit.

5.6.2.2 State Regulations

Porter-Cologne Act

The Porter-Cologne Water Quality Control Act of 1969, codified as Division 7 of the California Water Code, authorizes the SWRCB to provide comprehensive protection for California's waters through water allocation and water quality protection. The SWRCB implements the requirement of CWA Section 303, establishing that water quality standards have to be set for certain waters by adopting water quality control plans under the Porter-Cologne Act. The Porter-Cologne Act establishes the responsibilities and authorities of the nine RWQCBs, including preparing water quality plans for areas in the region, and identifying water quality objectives and waste discharge requirements (WDRs). Water quality objectives are defined as limits or levels of water quality constituents and characteristics established for reasonable protection of beneficial uses or prevention of nuisance. Beneficial uses consist of all the various ways that water can be used for the benefit of people and/or wildlife. The Porter-Cologne Act has been amended to provide the authority delegated from the United States Environmental Protection Agency (USEPA) to issue NPDES permits regulating discharges to surface waters of the U.S.

California Anti-Degradation Policy

A key policy of California's water quality program is the State's Anti-Degradation Policy. This policy, formally known as the Statement of Policy with Respect to Maintaining High Quality Waters in California (SWRCB Resolution No. 68-16), restricts degradation of surface and ground waters. In particular, this policy protects water bodies where existing quality is higher than necessary for the protection of beneficial uses. Under the Anti-Degradation Policy, any actions that can adversely affect water quality in all surface and ground waters must (1) be consistent with maximum benefit to the people of the state; (2) not unreasonably affect present and anticipated beneficial use of the water; and (3) not result in water quality less than that prescribed in water quality plans and policies (i.e., will not result in exceedances of water quality objectives).

California Construction General Permit

The State of California adopted a Statewide NPDES Permit for General Construction Activity (Construction General Permit) on September 2, 2009 (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). The last Construction General Permit amendment was adopted on September 8, 2022. The Construction General Permit regulates construction site stormwater management. Dischargers whose projects disturb one or more acres of soil, or whose projects disturb less than one acre, but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for discharges of stormwater associated with construction activity. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility.

To obtain coverage under this permit, project operators must electronically file Permit Registration Documents, which include a Notice of Intent (NOI), a Stormwater Pollution Prevention Plan (SWPPP), and

other compliance-related documents, such as a risk-level assessment for construction sites, an active stormwater effluent monitoring and reporting program during construction, rain event action plans, and numeric action levels (NALs) for pH and turbidity, as well as requirements for qualified professionals to prepare and implement the plan.

The SWPPP will include a site map, description of stormwater discharge activities, and best management practices (BMPs) taken from the menu of BMPs set forth in the California Stormwater Quality Association (CASQA) BMP Handbook that will be employed to prevent water pollution. It must describe BMPs that will be used to control soil erosion and discharges of other construction-related pollutants (e.g., petroleum products, solvents, paints, cement) that could contaminate nearby water bodies. It must demonstrate compliance with local and regional erosion and sediment control standards, identify responsible parties, provide a detailed construction timeline, and implement a BMP monitoring and maintenance schedule. The Construction General Permit requires the SWPPP to identify BMPs that will be implemented to reduce controlling potential chemical contaminants from impacting water quality. Types of BMPs include erosion control (e.g., preservation of vegetation), sediment control (e.g., fiber rolls), non-stormwater management (e.g., water conservation), and waste management. The SWPPP will also include descriptions of BMPs to reduce pollutants in stormwater discharges after all construction phases have been completed at the site (post-construction BMPs).

California Water Resources Control Board Low Impact Development Policy

The SWRCB adopted the Low Impact Development (LID) Policy which, at its core, promotes the idea of “sustainability” as a key parameter to be prioritized during the design and planning process for future development. The SWRCB has directed its staff to consider sustainability in all future policies, guidelines, and regulatory actions. LID is a proven approach to manage stormwater. The RWQCBs are advancing LID in California in various ways, including provisions for LID requirements in renewed NPDES Phase I Municipal Separate Storm Sewer System (MS4) permit.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) was passed by the State of California in 2014 and sets forth a statewide framework to help protect groundwater resources over the long-term. The SGMA gives local agencies the power to sustainably manage groundwater. It required DWR to establish priority levels for groundwater basins within the State based on their level of overdraft and required Groundwater Sustainability Agencies (GSAs) to form and develop Groundwater Sustainability Plans (GSPs) for medium- and high-priority groundwater basins that would bring the basins into sustainability by 2040 or 2042. Basins determined to be in critical overdraft were required to develop GSPs first. DWR is behind in the process of determining its approval of submitted GSPs for non-critical basins and was required to issue final notices of approval or disapproval by January 31, 2022.

5.6.2.3 Local and Regional Regulations

Los Angeles Region Water Quality Control Plan (Basin Plan)

The Los Angeles RWQCB is responsible for the protection of the beneficial uses of waters within the coastal watersheds of Los Angeles and Ventura counties, including the City of Santa Fe Springs. The Los Angeles RWQCB sets water quality standards for all ground and surface waters within its region through implementation of the Basin Plan (State Water Resources Control Board, 2020). The Basin Plan designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve the objectives for all waters addressed through the plan. More specifically, the Basin Plan: (i) identifies beneficial uses for surface and ground waters; (ii) includes narrative and numerical water quality

objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's anti-degradation policy; and (iii) describes implementation programs and other actions that are necessary to achieve the water quality objectives established in the Basin Plan. The Basin Plan also includes water discharge prohibitions applicable to particular conditions, areas, and types of waste.

The Basin Plan is continually being updated to include amendments related to implementation of TMDLs of potential pollutants or water quality stressors, revisions of programs and policies within the Los Angeles RWQCB region, and changes to beneficial use designations and associated water quality objectives.

Los Angeles Regional NPDES Permit

The City of Santa Fe Springs is a permittee under the Los Angeles RWQCB Order No. R4-2012-0175 (NPDES Permit No. CAS004001), adopted on November 8, 2012, which is a county-wide MS4 permit that regulates urban runoff for the County of Los Angeles, Los Angeles County Flood Control District, and 84 incorporated cities in Los Angeles County (except Long Beach). The Los Angeles County MS4 Permit was most recently amended on September 11, 2021, by Order No. R4-2021-0105 (NPDES Permit No. CAS004004). The County MS4 Permit requires priority projects to infiltrate, harvest and use, evapotranspire, or biotreat/biofilter, the 85th percentile of a 24-hour storm event (Design Capture Volume [DCV]).

The permit lists allowable and unallowable discharges and requires implementation of LID infrastructure, which are engineered facilities that are designed to retain and/or biotreat runoff on the Project site. Projects that qualify as a development or redevelopment project, which includes the proposed Project as specified by criteria in the County MS4 Permit, are required to develop a site-specific LID plan to reduce the discharge of pollutants in runoff. The LID plan is required to be approved prior to the issuance of a building or grading permit, and post-construction BMPs are required to be implemented.

Los Angeles Regional Water Quality Control Board Dewatering Permit

On September 13, 2018, the Los Angeles RWQCB adopted the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2018-0125, NPDES No. CAG994044) (Groundwater Discharge Permit). This Permit regulates construction dewatering and discharges of groundwater to surface waters during excavation. This permit specifies the discharge prohibitions, receiving water limitations, monitoring and reporting program requirements, and general compliance determination criteria for groundwater dewatering during construction activities. Dischargers are required to collect and analyze representative groundwater samples for all constituents listed in the Groundwater Discharge Permit. Based on the results, dischargers would be required to provide treatment for any toxic compounds detected above the applicable screening levels. To obtain coverage under the Groundwater Discharge Permit, each permittee must submit a Notice of Intent to begin the application process.

City of Santa Fe Springs General Plan

The City of Santa Fe Springs General Plan contains the following policies related to hydrology and water quality that are applicable to the Project (City of Santa Fe Springs 2021a).

Circulation Element

Goal C-12 **A sustainable and reliable water supply**

Policy C-12.5 **Water Quality.** Comply with all applicable water quality standards.

Goal C-13 **A sanitary sewer system with capacity to accommodate future growth**

- Policy C-13.4** **Unacceptable Waste Discharge.** Prevent unacceptable wastes from being discharged into the wastewater system.
- Goal C-14** **A sustainable and resilient stormwater system**
- Policy C-14.1** **Green Infrastructure.** Promote green infrastructure projects that capture stormwater for reuse, improved water quality, and reduced flooding risk, including but not limited to permeable pavements, rain gardens, bioswales, vegetative swales, infiltration trenches, green roofs, planter boxes, and rainwater harvesting/rain barrels or cisterns for public and private projects.
- Policy C-14.2** **Storm Drain.** Expand and maintain local storm drain facilities to accommodate the needs of existing and planned development, and to ensure it has capacity to withstand more frequent and intense storms and extreme flooding events; prioritize areas that have known drainage capacity issues.
- Policy C-14.3** **Storm Drain Pollution.** Implement all appropriate programs and requirements to reduce the amount of pollution entering the storm drain system and waterways.
- Policy C-14.4** **Surface Water Infiltration.** Encourage site drainage features that reduce impermeable surface area, increase surface water infiltration, and minimize surface water runoff during storm events.
- Policy C-14.5** **Permeable Surfaces.** Encourage the reduction of impervious surfaces by discouraging excess parking areas, enforcing low-impact development and best management practices treatment methods, and increasing greenery, as well as increasing the City's inventory of green spaces.

Conservation and Open Space Element

- Goal COS-4** **Clean surface water, drainages, and groundwater**
- Policy COS-4.4** **Runoff Pollution Prevention.** Require that new developments incorporate features into site drainage plans that reduce impermeable surface area, increase surface water infiltration, and minimize surface water runoff during storm events. Such features may include additional landscape areas, parking lots with bio-infiltration systems, permeable paving designs, and stormwater detention basins.
- Goal COS-5** **An expansive urban forest and related benefits**
- Policy COS-5.5** **Environmental Benefits.** Expand urban greening to reduce air and noise pollution, reduce and clean urban runoff, increase groundwater recharge, improve ecological diversity, and help cool neighborhoods by minimizing heat island effects.

Safety Element

- Goal S-3** **Minimize exposure of residents, businesses, and habitats to hazardous materials and their deleterious effects**
- Policy COS-5.5** **Contamination Protection.** Protect natural resources— including groundwater—from hazardous waste and materials contamination.

City of Santa Fe Springs Development Code

Chapter 52 – Stormwater Management and Discharge Control: Chapter 52 of the Santa Fe Springs Development Code consolidates the legal authority of the City necessary to control discharges to and from the municipal stormwater system as required by the NPDES permit. This chapter ensures the health, safety, and welfare of the citizens of the City by reducing pollutants in stormwater discharges to the maximum extent practicable, reducing the level of contamination of stormwater and urban runoff in the municipal stormwater system, and regulating non-stormwater discharges into the municipal stormwater system. This chapter establishes legal authority to adopt applicable best management practices and other stormwater pollution control measures, and carry out all inspections, conduct surveillance, conduct monitoring, cite infractions, and impose fines necessary to ensure compliance with this chapter.

5.6.3 ENVIRONMENTAL SETTING

5.6.3.1 Regional Hydrology

The City of Santa Fe Springs is located within the Los Angeles Region. The Los Angeles RWQCB (Region 4) has jurisdiction over all coastal watersheds and drainages flowing to the Pacific Ocean between Rincon Point (on the coast of western Ventura County) and the eastern Los Angeles County line, as well as the drainages of five coastal islands (Anacapa, San Nicolas, Santa Barbara, Santa Catalina, and San Clemente). The Los Angeles Region encompasses 10 watershed management areas, which generally consist of a single large watershed within which exist smaller sub-watersheds that are tributary to the mainstem river (State Water Resources Control Board, 2020).

5.6.3.2 Watershed

The Project is located in the Lower San Gabriel River Watershed, which encompasses an approximately 78.5 square miles (50,240 acres) within Los Angeles County and comprises 11.4 percent drainage area for the San Gabriel River Watershed. The San Gabriel River Watershed is located in the eastern portion of Los Angeles County. It is bound by the San Gabriel Mountains to the north, most of San Bernardino/Orange County to the east, the division of the Los Angeles River from the San Gabriel River to the west, and the Pacific Ocean to the south. The San Gabriel River Watershed covers an area of approximately 689 square miles. The main channel of the San Gabriel River is approximately 58 miles long. Its headwaters originate in the San Gabriel Mountains with the East, West, and North Forks. The river empties to the Pacific Ocean at the Los Angeles and Orange Counties boundary in Long Beach. The main tributaries of the San Gabriel River are Big and Little Dalton Wash, San Dimas Wash, Walnut Creek, San Jose Creek, Fullerton Creek, and Coyote Creek (John L Hunter and Associates, 2014).

5.6.3.3 Groundwater Basin

Santa Fe Springs is located over the Central Basin groundwater basin, which is a subbasin of the Coastal Plain of Los Angeles Groundwater Basin. The Central Basin is bounded to the north by the Hollywood Basin and the Elysian, Repetto, Merced, and Puente Hills; to the east by the Los Angeles County/Orange County line; and to the south and west by the Newport-Inglewood Uplift, a series of discontinuous faults and folds that form a prominent line of northwest-trending hills including the Baldwin Hills, Dominguez Hills, and Signal Hill. The Central Basin covers approximately 280 square miles and is hydrogeologically divided into four subareas – the Los Angeles Forebay, Montebello Forebay, Whittier Area, and Pressure Area. The forebays are areas where confining layers are thin or absent and infiltration of precipitation and surface water can recharge deeper potable water supply aquifers. The Montebello Forebay is the most significant area of

recharge in the Central Basin. The Whittier Area and Pressure Area are confined aquifer systems that receive relatively minimal recharge from surface water but are replenished from the upgradient forebay areas or other groundwater basins. As of 2020, the California Department of Water Resources does not identify the Central Basin as being in overdraft (City of Santa Fe Springs, 2021b).

Groundwater in the Central Basin is recharged via surface spreading at the Whittier Narrows Dam, Montebello Forebay Spreading Grounds, infiltration in the unlined portions of the Lower San Gabriel River, and via direct injection at the Alamitos Barrier Project. The lower San Gabriel River extends from the Whittier Narrows Dam through the Pacific coastal plain ending at Long Beach. Through most of the Montebello Forebay, the San Gabriel River is unlined, allowing spreading by percolation through its unlined bottom. The river is lined from about Firestone Avenue through the remainder of the Central Basin.

Natural recharge to the Central Basin includes surface infiltration of precipitation and applied water (such as landscape irrigation), subsurface inflow from the surrounding mountains, through the Los Angeles and Whittier Narrows and along the boundary with the Orange County Basin, and through stormwater percolation at the spreading grounds and unlined portions of rivers. Sources of artificial recharge include recycled water, imported water, and stormwater.

The Water Replenishment District of Southern California (WRD) is the largest groundwater management agency in the State of California, with a 420-square mile service area that encompasses 43 cities and four million residents in southern Los Angeles County. WRD manages the Central Basin and the West Coast Basin, which comprise approximately 50 percent of the geographic area and 53 percent of the population of the Los Angeles-Orange County coastal plain aquifer system, part of the California Coastal Basins aquifers. WRD was created in 1959 to address the problem of severe groundwater overdraft and seawater intrusion in Los Angeles County, and in that role, has been monitoring groundwater in the Central Basin and West Coast Basin for over 50 years. With the adjudication of groundwater rights in the early 1960s, the Central Basin adjudication was set at 267,900 acre-feet per year (AFY), although the judgment set a lower allowed pumping allocation of 217,367 AFY to impose stricter control (Water Replenishment District of Southern California, 2016).

5.6.3.4 Water Quality

Watershed. The Project site is within the San Gabriel River watershed and under the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB), which sets water quality standards for all ground and surface waters within its region. Water quality standards for all ground and surface waters overseen by the LARWQCB are documented in its Basin Plan, and the regulatory program of the LARWQCB is designed to minimize and control discharges to surface and groundwater, largely through permitting, such that water quality standards are effectively attained.

Drainage. Water quality impairments vary by reach. Drainage from the Project site drains to the San Gabriel River Reach 2, then to San Gabriel River Reach 1 where it joins San Pedro Bay. According to the Low Impact Development (LID) Plan prepared for the proposed Project, water quality impairments for the San Gabriel River Reach 2 are copper, lead, cyanide, and water temperature; the impairment for Reach 1 is warm water temperature (Huitt Zoliars, 2024).

Groundwater Contamination. The Omega Chemical Corporation was a refrigerant and solvent recycling company that operated in the City of Whittier between 1976 and 1991. As a result of business operations, spills and leaks of various chemicals contaminated the soil and groundwater beneath the facility with high concentrations of tetrachloroethene (PCE) and trichloroethene (TCE). The contaminated area has been

identified as a Superfund site pursuant to CERCLA. Prolonged exposure to these chemicals has been proven to cause severe long-term health effects.

As shown in the City's General Plan EIR Exhibit 4.9-4 (Contaminated Groundwater Plume), these chemicals have contaminated the groundwater and migrated southwest, creating a large plume beneath the City including the Project site. In 2011, the USEPA selected an interim remedial action to contain and treat the large plume of contaminated groundwater with the overall objective to protect human health and the environment by preventing further spreading of the contaminated groundwater.

Numerous groundwater studies in the regional area of the oil field were performed between 1994 and 2010. Both EPA and the RWQCB agreed that, although groundwater beneath the oil fields in the region are impacted in some places, none of the impact is attributable to the oil field historical or current use (Waterstone Environmental, Inc., 2022). Similarly, the Phase I that was prepared for the site that is adjacent to the proposed Project site (and part of the same oil field) determined that based on the extensive soil and groundwater studies performed for the Santa Fe Springs Oil Field, the proximity of adjacent site, the similar site oil field uses, and the decisions of the RWQCB, DTSC, and EPA, there are no groundwater issues associated with the site adjacent to the Project site based on its historical use for oil production. Groundwater in the RWQCB monitoring wells in the Project area in May 2022 had a depth to groundwater ranging from 105.71 to 111.43 feet below the ground surface (Waterstone Environmental, Inc., 2022).

5.6.3.5 Water Supply

The City of Santa Fe Springs Water Utility Authority provides water supply to most of the City, covering approximately 90 percent of the land area within the City limits, including the Project site. Historically, the water supply sources have included local groundwater pumped from City wells, treated groundwater through the Water Quality Protection Program, treated imported water purchased from Metropolitan Water District through Central Basin Municipal Water District (CBMWD), and recycled water supplies provided by CBMWD (City of Santa Fe Springs, 2021a).

5.6.3.6 Existing Flood Zone Designation

The Project site is within "Zone X" of "Other Flood Areas," as determined by the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) (Map Number 06037C1829F). These areas are defined as areas of 0.2 percent annual chance of flood; areas of 1 percent annual chance of flood with average depth of less than one foot or with drainage areas of less than one square mile; and areas protected by levees from 1 percent annual chance of flood (Federal Emergency Management Agency, 2024). Zone X is outside the Special Flood Hazard Areas, which are subject to inundation by the 1 percent chance flood.

5.6.3.7 Existing Drainage

The site is relatively flat and generally drains from northeast to southwest. The Project site contains sparse vegetation consisting primarily of ornamental trees and shrubs. The Project site does not contain any existing wetlands, drainages, or jurisdictional waters.

The City of Santa Fe Springs Department of Public Works maintains and operates the City's stormwater system. The existing site is approximately 98 percent pervious, though graded roads travelled by vehicles and heavy machinery most likely have heavily compacted a small percentage of the total area. An existing 51-inch reinforced concrete pipe storm drain runs parallel to and within a few feet inside the Project's east property line and connects to a 54-inch storm drain below Telegraph Road. This 54-inch storm drain runs

west until it connects to a Los Angeles County Flood Control District owned drain that eventually drains into the San Gabriel River.

5.6.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- HYD-1 Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.
- HYD-2 Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
- HYD-3 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site.
- HYD-4 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite.
- HYD-5 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would 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.
- HYD-6 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows.
- HYD-7 In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.
- HYD-8 Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

The Initial Study (Appendix A) established that the proposed Project would not result in impacts related to threshold HYD-7; therefore, no further assessment of this threshold is required in this Draft EIR.

5.6.5 METHODOLOGY

This evaluation of the significance of potential impacts related to hydrology and water quality is based on a review of published information and reports regarding regional hydrology, groundwater conditions, and surface water quality. The potential impacts on hydrology and water quality were evaluated by considering the general type of pollutants that operation of the Project would generate during construction and operation. In determining the level of significance, the analysis recognizes that development under the proposed Project would be required to comply with relevant federal, State, and regional laws and regulations that are designed to ensure compliance with applicable water quality standards and waste discharge requirements. Because the regional and local regulations related to water quality standards have been developed to reduce the potential of pollutants in the water resources (as described in Section 5.6.2, *Regulatory Setting*, above), and are implemented to specific waterbodies, such as 303(d) TMDL requirements, or development projects such as grading and construction permit regulations, implementation of all relevant

water quality and hydrology requirements would limit the potential of the proposed Project to a less-than-significant impact.

5.6.6 ENVIRONMENTAL IMPACTS

IMPACT HYD-1: THE PROJECT WOULD NOT VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS OR OTHERWISE SUBSTANTIALLY DEGRADE SURFACE OR GROUND WATER QUALITY.

Construction

Less than Significant Impact. Implementation of the proposed Project includes development involving removal of existing buildings and well infrastructure, site preparation, construction of two new buildings, and infrastructure improvements. Grading, stockpiling of materials, excavation and the import/export of soil and building materials, construction of new structures, and landscaping activities would expose and loosen sediment and building materials, which have the potential to mix with stormwater and urban runoff and degrade surface and receiving water quality.

Additionally, construction generally requires the use of heavy equipment and construction-related materials and chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents, and paints. In the absence of proper controls, these potentially harmful materials could be accidentally spilled or improperly disposed of during construction activities and could wash into and pollute surface waters or groundwater, resulting in a significant impact to water quality.

Pollutants of concern during construction activities generally include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. In addition, chemicals, liquid products, petroleum products (such as paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction, which would have the potential to be transported via storm runoff into nearby receiving waters and eventually may affect surface or groundwater quality. During construction activities, excavated soil would be exposed, thereby increasing the potential for soil erosion and sedimentation to occur compared to existing conditions. In addition, during construction, vehicles and equipment are prone to tracking soil and/or spoil from work areas to paved roadways, which is another form of erosion that could affect water quality.

However, pursuant to Santa Fe Springs Municipal Code Section 52.18, each discharger associated with industrial/commercial activity or construction activity shall comply with all requirements of the NPDES permit, as may be issued by the USEPA, the SWRCB, or the RWQCB, and the City's development construction program. Construction activity resulting in a land disturbance of one acre or more, or less than one acre but part of a larger common plan of development or sale, must obtain coverage under the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (CGP). The existing NPDES Construction General Permit requires preparation and implementation of a SWPPP by a Qualified SWPPP Developer (QSD) for construction activities that disturb one acre or more of soil, as included in PPP HYD-1. The SWPPP is required to address site-specific conditions related to potential sources of sedimentation and erosion and would list the required BMPs that are necessary to reduce or eliminate the potential of erosion or alteration of a drainage pattern during construction activities. Common types of construction BMPs include:

- Silt fencing, fiber rolls, or gravel bags;
- Street sweeping and vacuuming;
- Storm drain inlet protection;

- Stabilized construction entrance/exit;
- Vehicle and equipment maintenance, cleaning, and fueling;
- Hydroseeding;
- Material delivery and storage;
- Stockpile management;
- Spill prevention and control;
- Solid waste management; and/or
- Concrete waste management.

In addition, a Qualified SWPPP Practitioner (QSP) is required to ensure compliance with the SWPPP through regular monitoring and visual inspections during construction activities. The SWPPP would be amended and BMPs revised, as determined necessary through field inspections, in order to protect against substantial soil erosion, the loss of topsoil, or alteration of the drainage pattern. Compliance with the Construction General Permit and a SWPPP prepared by a QSD and implemented by a QSP would prevent construction-related impacts related to potential alteration of a drainage pattern or erosion from development activities.

Therefore, compliance with the State Construction General Permit (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ, 2012-0006-DWQ, and 2022-0057-DWQ) and the City of Santa Fe Springs Municipal Code, and other applicable requirements, which would be verified during the City's construction permitting process, would ensure that Project impacts related to construction activities resulting in a degradation of water quality would be less than significant. Additional information about contamination of onsite soils from existing and historic oil well activities is provided in Section 5.5, *Hazards and Hazardous Materials*.

Contaminated Groundwater

As shown in the City's General Plan EIR Exhibit 4.9-4 (Contaminated Groundwater Plume), the Project site overlies a contaminated groundwater plume identified as a Superfund site pursuant to CERCLA. The contaminated groundwater plume containing PCE and TCE is under remedial action by the USEPA. However, groundwater in the RWQCB monitoring wells in the Project area in May 2022, as recorded in the Phase I and Limited Phase II Environmental Assessment Report for the site, had a depth to groundwater ranging from 105.71 to 111.43 feet below the ground surface (Waterstone Environmental, Inc., 2022). Excavation for the proposed Project is anticipated to reach depths of approximately 15 feet below the ground surface, which would not encroach into groundwater; and there is no potential for contaminated groundwater to be encountered during construction.

Although not anticipated, should Project excavation encounter contaminated water, proposed Project construction would be required to incorporate contaminated dewatering measures in compliance with the Groundwater Discharge Permit (General NPDES Permit No. CAG994004). This permit would require testing and treatment as necessary for water encountered prior to release to surface waters to ensure that discharges do not contain pollutants. Compliance with the requirements of the Groundwater Discharge Permit, which would be implemented through the City's development permitting process, would ensure that potential impacts related to a water quality standards or waste discharge requirements would be less-than-significant.

Operation

Less than Significant Impact. As previously mentioned, the Project site within the San Gabriel River Watershed and ultimately drains to the San Gabriel River Reach 2, then to San Gabriel River Reach 1 where it joins San Pedro Bay. Various reaches of the San Gabriel River Watershed, including Reach 1 and Reach 2, are on the Section 303(d) List of impaired water bodies for metals and selenium. Currently, the site is approximately 2 percent impervious. The proposed Project includes development of two warehouse buildings

on a 26.77-acre site. The proposed Building 1 would be 298,373 SF and Building 2 would be 286,305 SF. Additional improvements would include landscaping, utility connections, implementation of stormwater facilities, pavement of parking areas and construction of a cul-de-sac driveway. The proposed Project would add 1,091,392 SF of impervious surface area (resulting in 93 percent of the site area) and have approximately 7 percent of the Project site as pervious landscaping. Landscape and irrigation plans would be submitted to the City during the permitting process and must include plants approved by the City in order to ensure the use of low-water plants and follow local and State requirements for efficient water use. Therefore, adherence to local and State requirements, as confirmed during the permitting process, would reduce the use of groundwater and maximize infiltration.

Increases in impervious surface area would result in an increase in the volume and flow rate of surface runoff and potential pollutants from vehicles. Operation of the proposed land uses could generate pollutants including trash, debris, oil residue, and other residue that could be deposited on streets, sidewalks, driveways, paved areas, and other surfaces and wash into receiving waters. The pollutants that could be released include bacteria, nutrients, oil and grease, metals, organics, and pesticides. Nutrients in post-construction stormwater include nitrogen and phosphorous from fertilizers from landscaping areas. Excess nutrients can impact water quality by promoting excessive and/or rapid growth of aquatic vegetation and algae growth, which reduces water clarity and results in oxygen depletion. Pesticides can be toxic to aquatic organisms and bioaccumulate in larger species such as birds and fish and result in harmful effects. Oil and grease may end up in stormwater from leaking vehicles, and metals may enter stormwater as surfaces corrode, decay, or leach and from roadway runoff. Pollutants have the potential to further exacerbate existing impairments of local water bodies.

Proposed drainage improvements would include construction of several inlets, roof drains, and onsite drainage pipes to convey site runoff to two underground infiltration trench systems. Overflow for both infiltration trenches would be conveyed to Hawkins Street. The stormwater infrastructure would capture and treat the 85th percentile of a 24-hour storm event, consistent with the County MS4 Permit requirements. The proposed stormwater system would provide improved infiltration compared to existing conditions

In compliance with the NPDES Permit and the City's Municipal Code Chapter 52, development projects are required to prepare a Low Impact Development (LID) report, included as PPP HYD-2. The LID report identifies source control, site design, and treatment control BMPs to protect surface water quality. The LID report is required to be approved prior to the issuance of a building or grading permit which would ensure it complies with the County MS4 Permit regulations. A LID Plan (included as Appendix F) has been prepared per these requirements and it includes various BMPs to be incorporated, including those listed in Table 5.6-1. Refer to Appendix F for the full description of the BMPs included in the Project.

Table 5.6-1: Types of BMPs Incorporated into the Project Design

Type of BMP	BMP Identifier and Name
Source Control – Routine Non-Structural	N1: Education for Property Owners, Tenants and Occupants
	N2: Activity Restrictions
	N3: Common Area Landscape Management
	N4: BMP Maintenance
	N7: Spill Contingency Plan
	N11: Common Area Litter Control
	N12: Employee Training
	N13: Housekeeping of Loading Docks
	N14: Common Area Catch Basin Inspection

Type of BMP	BMP Identifier and Name
	N15: Street Sweeping Private Streets and Parking Lots
Source Control – Routine Structural	S2: Common Area Efficient Irrigation
	S3: Common Area Runoff-Minimizing Landscape Design
	S6: Waste Management (Trash Dumpster) Areas
	S13: Catch Basin Stenciling
	S15: Inlet Trash Racks
	S17: Stormwater Filters
	S22: Infiltration Trench
Additional Source Control	SD13: Storm Drain System Signs
Site Design	SD10: Site Design and Landscape Planning

Source: Appendix F

In addition, the City's permitting process would ensure that all BMPs in the LID report are constructed during implementation of the Project. Overall, compliance with existing laws and regulations and implementation of the LID report (included as PPP HYD-2) would ensure that implementation of the proposed Project would not violate any water quality standards, waste discharge requirements, or otherwise degrade water quality, and impacts would be less than significant.

IMPACT HYD-2: THE PROJECT WOULD NOT SUBSTANTIALLY DECREASE GROUNDWATER SUPPLIES OR INTERFERE SUBSTANTIALLY WITH GROUNDWATER RECHARGE SUCH THAT THE PROJECT MAY IMPEDE SUSTAINABLE GROUNDWATER MANAGEMENT OF THE BASIN.

Less than Significant Impact. The Project site is underlain by the Central Basin, which is fully adjudicated and managed by the WRD. The Sustainable Groundwater Management Act (SGMA) of 2014 created a statewide framework to help protect groundwater resources over the long-term. SGMA is comprised from a three-bill legislative package, including AB 1739 (Dickinson), SB 1168 (Pavley), and SB 1319 (Pavley), and subsequent statewide regulations. SGMA requires local agencies to form Groundwater Sustainability Agencies (GSAs) for high and medium priority basins. GSAs are required to then develop and implement Groundwater Sustainability Plans (GSPs) to avoid undesirable results and mitigate overdraft within 20 years. Low priority basins are not required to form GSAs or GSPs at this time. The Central Basin has been identified by the California Department of Water Resources as a very low-priority groundwater basin that is not required to form a GSA or GSP. Additionally, the Central Basin is exempt from this requirement due to the adjudication. Therefore, the proposed Project would not conflict with the SGMA.

The City's Water Utility Authority provides water supply to most of the City, including the Project site. The City currently purchases treated Central Basin groundwater from the WRD, which manages and supplies water from the basin to various municipalities and agencies in the area such that substantial depletion of groundwater supplies would not occur. The water that would be provided to the Project would be through this service provider and at adjudicated quantities. Therefore, the proposed Project would not conflict with the groundwater basin adjudications and would not impede existing groundwater management. Thus, the proposed Project would not substantially decrease groundwater supplies.

As previously analyzed under Impact HYD-1, development of the proposed Project would result in 1,091,392 SF of impervious area (93 percent of the site). Runoff from the site would be collected via a proposed onsite storm drain system (including storm inlets and storm drain pipes) and conveyed to two underground infiltration trench systems. The infiltration trenches would be 200 feet by 80 feet and 200 feet by 78 feet and would be located underground below the trailer stalls area, between Building 1 and Building 2. The stormwater infrastructure would capture and treat the 85th percentile of a 24-hour storm event, consistent with the

County MS4 Permit requirement. A LID Plan (included as Appendix F) has been prepared for the proposed Project and it includes various BMPs to be incorporated into the Project design to protect water quality and increase the infiltration rate within the site. The proposed stormwater system would provide improved infiltration and groundwater recharge capabilities compared to existing conditions. Therefore, the Project would not substantially impede groundwater recharge of the Project site.

Compliance with the County MS4 permit requirements, the City's Municipal Code, and other applicable requirements implemented through the LID, which would be verified during the Project permitting process, would ensure that Project impacts related to groundwater depletion and recharge would be less than significant.

IMPACT HYD-3: THE PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD RESULT IN A SUBSTANTIAL EROSION OR SILTATION ON- OR OFF-SITE.

Construction

Less than Significant Impact. Construction of the Project would require site clearing and grading. Excavation, grading, and other site preparation activities would loosen soils, which has the potential to result in erosion and the loss of topsoil. Also, the Project site is generally flat and does not contain substantial slopes that could induce erosion or siltation, which refers to the accumulation of silt (fine particles of sand, mud, and other materials) in a body of water. As discussed above, the existing NPDES Construction General Permit, as included as PPP HYD-1, requires preparation and implementation of a SWPPP by a Qualified SWPPP Developer for construction activities that disturb one-acre or more of soils. The SWPPP is required to address site-specific conditions related to potential sources of sedimentation and erosion and would list the required BMPs that are necessary to reduce or eliminate the potential of erosion or alteration of a drainage pattern during construction activities.

Overall, with implementation of the existing construction regulations that would be verified by the City during the permitting approval process, impacts related to alteration of an existing drainage pattern during construction that could result in substantial erosion or siltation would be less than significant.

Operation

Less than Significant Impact. The existing drainage pattern for the site generally flows from northeast to southwest. Runoff from the site would be collected via a proposed storm drain system (including storm drain inlets and drainage pipes) and conveyed to two underground infiltration trench systems. The two infiltration trenches would be constructed to allow runoff of the whole site including roof and surrounding paved areas to be collected in a perforated pipe and gravel system that would infiltrate into the soil. Overflow for both infiltration trenches would be ultimately conveyed to the existing 51-inch storm drain along the site's eastern boundary, below Hawkins Street. In the post-project condition, the drainage characteristics would be maintained as similar to the pre-Project condition.

The Project site would be mostly developed with impervious surfaces and onsite landscaping would minimize the potential for erosion or siltation on site. As previously discussed, the Project would include implementation of BMPs designed to fully capture and infiltrate stormwater pursuant to MS4 requirements, limiting reducing offsite stormwater flows. As part of the permitting approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City's Public Works Department to ensure that they meet the County's NPDES Permit and limit the potential for erosion and siltation. Therefore, impacts related to alteration of a drainage pattern and erosion/siltation from operational activities would be less than significant.

IMPACT HYD-4: THE PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD SUBSTANTIALLY INCREASE THE RATE OR AMOUNT OF SURFACE RUNOFF IN A MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFF-SITE.

Construction

Less than Significant Impact. Construction of the proposed Project would include activities that could temporarily alter the existing drainage pattern of the site, for example by constructing foundations and paved areas, and could result in flooding on- or offsite if drainage is not properly controlled. However, as described previously, implementation of the Project requires a SWPPP that would address site-specific drainage issues related to construction of the Project and include BMPs to eliminate the potential of flooding or alteration of a drainage pattern during construction activities. This includes diverting runoff from rooftops and other impervious surfaces to vegetated areas, when possible, to promote infiltration and controlling the perimeter of site using sandbags, berms, and silt fencing. These regulations would ensure that the rate or amount of surface runoff would not substantially increase during the construction phase. Therefore, impacts related to rate or amount of surface runoff would be less than significant.

Operation

Less than Significant Impact. As described previously, the proposed Project would result in an increase in impervious areas onsite. As a result, the Project would increase surface flows compared to existing conditions. However, the proposed Project includes installation of new stormwater drainage facilities, including two underground infiltration trench systems, pervious landscaped areas, and new storm drains. The proposed stormwater drainage system would collect onsite flows via a series of catch basins and storm drains.

Proposed onsite drainage infrastructure has capacity to retain 85 percent of the Project site's DCV, consistent with the County MS4 Permit requirement. Overflow for both infiltration trenches would be conveyed ultimately to the existing storm drain along the site's eastern boundary, below Hawkins Street. Implementation of the Project would maintain existing drainage patterns of the Project site. The use of the onsite infiltration trench systems would regulate the rate and velocity of stormwater flows and would control the amount of discharge into the offsite drainage system. The proposed Project is not anticipated to result in flooding conditions to upstream or downstream properties with the implementation of BMPs identified in the LID plan (Appendix F). As part of the permitting approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City Department of Public Works to ensure that they meet the County MS4 Permit requirements and would not result in flood impacts.

Overall, the drainage facilities proposed for the Project have been sized to be consistent with the County MS4 permit requirements. Thus, implementation of the Project would not substantially increase the rate or amount of surface runoff, such that flooding would occur. Impacts would be less than significant.

IMPACT HYD-5: THE PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD 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.

Less than Significant Impact. The Project site currently can be considered 2 percent impervious. Development of the proposed Project would result in 1,091,392 SF (or 93 percent) of impervious area. The Project site

currently drains from northeast to southwest. Flows from the project site currently discharge to a 51-inch storm drain that runs parallel to and within a few feet inside the Project's east property line and eventually drain into the San Gabriel River.

The proposed underground infiltration trench systems would regulate the rate and velocity of stormwater flows and would control the amount of discharge into the offsite drainage system. The proposed drainage facilities have been sized to adequately accommodate the stormwater flows from the proposed development and are consistent with the County drainage plans and County MS4 permit requirements, with a has capacity to retain 85 percent of the Project site's DCV. Overflow for both infiltration trenches would be ultimately conveyed to the existing storm drain along the eastern boundary of the site, below Hawkins Street. Implementation of the Project would maintain existing drainage patterns of the Project site. The LID Plan (Appendix F) prepared for the proposed Project includes various BMPs to be incorporated into the Project design to protect water quality. Therefore, the proposed Project is not anticipated to result in flooding conditions or substantial additional sources of polluted runoff to upstream or downstream properties with implementation of BMPs identified in the LID plan (Appendix F).

Overall, the proposed drainage improvements would be consistent with County standards and MS4 permit requirements. Therefore, Project impacts would be less than significant.

IMPACT HYD-6: THE PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD IMPEDE OR REDIRECT FLOOD FLOWS.

Construction

Less than Significant Impact. As described above, the Project site generally drains from northeast to southwest. Implementation of the Project would maintain existing drainage patterns of the Project site, for example by constructing foundations and paved areas, and could result in flooding on- or offsite if drainage is not properly controlled. However, as described previously, implementation of the Project requires a SWPPP that would address site specific drainage issues related to construction of the Project and include BMPs to eliminate the potential of flooding or alteration of a drainage pattern during construction activities. This includes regular monitoring and visual inspections during construction activities. Compliance with the County MS4 Permit and a SWPPP, as verified by the City through the construction permitting process, would prevent construction-related impacts related to potential impediment or redirection of flood flows. Therefore, Project impacts would be less than significant.

Operation

Less than Significant Impact. Per the FEMA's Flood Map Service Center, the Project is within Zone X, an area determined to be outside of the 0.2 percent annual chance floodplain (Map Number 06037C1829F). As described previously, the proposed Project would result in an increase in impervious areas. As a result, the Project would increase surface flows compared to existing conditions. However, the proposed Project would include installation of new stormwater drainage facilities, including two underground infiltration trench systems, pervious landscaped areas, and new storm drains. The proposed stormwater drainage system would collect onsite flows via a series of catch basins and storm drains. Proposed onsite drainage infrastructure has capacity to retain 85 percent of the Project site's DCV, consistent with the County MS4 Permit requirement. Overflow for both infiltration trenches would be conveyed ultimately to the existing 51-inch storm drain along the site's eastern boundary, below Hawkins Street. Implementation of the Project would maintain existing drainage patterns of the Project site. The use of the onsite infiltration trench systems would regulate the rate and velocity of stormwater flows and would control the amount of discharge into the offsite drainage system. The proposed flowrate would be slightly greater than the existing flowrate; however, the drainage

system would be designed consistent with County MS4 Permit standards. As part of the permitting approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City Department of Public Works to ensure that they meet the County MS4 Permit requirements and would not result in flood impacts.

Overall, the drainage facilities proposed for the Project have been sized to be consistent with the County MS4 permit requirements. The Project site is not within an existing floodplain and would not contribute to increased flooding. Thus, implementation of the Project would not substantially impede or redirect flood flows and impacts would be less than significant.

IMPACT HYD-8: THE PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF A WATER QUALITY CONTROL PLAN OR SUSTAINABLE GROUNDWATER MANAGEMENT PLAN.

Less than Significant Impact. The site is approximately 2 percent impervious in the existing condition. Development of the proposed Project would result in 1,091,392 SF (or 93 percent) of impervious area. As described above, the proposed storm drain system is sized to adequately accommodate increased stormwater flows from the Project area and would maintain the existing drainage pattern of the site. Runoff would discharge and be treated into the two underground infiltration trench systems onsite that would filter and infiltrate stormwater into the site soils and potentially the groundwater. Therefore, the Project would not conflict with or obstruct the SGMA. The City is within the jurisdiction of the Los Angeles RWQCB (Region 4). The Los Angeles RWQCB sets water quality standards for all ground and surface waters within its region through implementation of a Water Quality Control Plan (Basin Plan). This Basin Plan gives direction on the beneficial uses of the State waters within Region 4, describes the water quality that must be maintained to support such uses, and provides programs, projects, and other actions necessary to achieve the established standards. The Los Angeles County's NPDES Permit, incorporated in the City's Municipal Code Chapter 52, would require development projects to prepare a LID, included as PPP HYD-2. The LID plans are required to include BMPs for source control, site design, and treatment control. LID plans would be reviewed and approved by the City's Public Works Department prior to issuance of grading permits to ensure compliance. The City's permitting process would ensure that all BMPs in the LID report are constructed during implementation of the Project. As discussed under Impact HYD-2, the Central Basin is adjudicated, and therefore, is not subject to a sustainable groundwater management plan. Thus, the Project would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

5.6.7 CUMULATIVE IMPACTS

The areas considered for cumulative impacts to hydrology and water quality are the Lower San Gabriel River Watershed for drainage and water quality impacts, and the Central Basin for groundwater impacts.

Water Quality: The geographic scope for cumulative impacts related to hydrology and water quality includes the Lower San Gabriel River watershed because cumulative projects and developments pursuant to the proposed Project could incrementally exacerbate the existing impaired condition and could result in new pollutant-related impairments.

Related developments within the watershed would be required to implement water quality control measures pursuant to the same NPDES General Construction Permit that requires implementation of a SWPPP (for construction), a LID plan (for operation) and BMPs to eliminate or reduce the discharge of pollutants in stormwater discharges, reduce runoff, reduce erosion and sedimentation, and increase filtration and infiltration. The NPDES permit requirements have been set by the SWRCB and implemented by the Los Angeles RWQCB (and Santa Fe Springs Municipal Code) to reduce incremental effects of individual projects so that they would not become cumulatively considerable. Therefore, overall potential impacts to water

quality associated with present and future development in the watershed would not be cumulatively considerable upon compliance with all applicable laws, permits, ordinances and plans. As detailed previously, the proposed Project would be implemented in compliance with all regulations, as would be verified during the permitting process. Therefore, cumulative impacts related to water quality would be less than significant.

Drainage: The geographic scope for cumulative impacts related to stormwater drainage includes the geographic area served by the existing stormwater infrastructure for the Project area, from capture of runoff through final discharge points. As described above the proposed Project includes installation of two underground infiltration trench systems that would retain, slow, filter, and infiltrate 85th percentile of a 24-hour design storm. These facilities would retain runoff and reduce erosion and siltation. In addition, pursuant to State and regional regulations that require development projects to maintain pre-project hydrology, no net increase of offsite stormwater flows would occur. As a result, the proposed Project would not generate runoff that could combine with additional runoff from cumulative projects that could cumulatively combine to impact erosion, siltation, flooding, and water quality. Thus, cumulative impacts related to drainage would be less than significant.

Groundwater Basin: The geographic scope for cumulative impacts related to the groundwater basin is the Central Basin. As described above, the proposed Project includes installation of underground infiltration trench systems that would recharge stormwater into the groundwater basin. In addition, the volume of water that would be needed by the Project is within the anticipated groundwater pumping volumes since the basin is adjudicated. Therefore, the Project would not result in changes to the projected groundwater pumping that would decrease groundwater supplies. As a result, the proposed Project would not generate impacts related to the groundwater basin that have the potential to combine with effects from other projects to become cumulatively considerable. Therefore, cumulative impacts related to the groundwater basin would be less than significant.

5.6.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- Construction General Permit, Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ, 2012-0006-DWQ, and 2022-0057-DWQ
- California Water Resources Control Board Low Impact Development (LID) Policy
- Los Angeles Region MS4 permit (Order No. R4-2012-0175)
- City Municipal Code Chapter 52, Stormwater Management and Discharge Control

Plans, Programs, or Policies

The following Plans, Programs, and Policies (PPPs) that are listed below would reduce impacts related to hydrology and water quality. These actions will be included in the Project's Mitigation Monitoring and Reporting Program:

PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Building and Safety Department with evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

PPP HYD-2: LID. Prior to the issuance of any grading permits, a completed Low Impact Development Plan (LID) shall be submitted to and approved by the City's Public Works Department. The LID shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.

5.6.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impacts HYD-1, HYD-2, HYD-3, HYD-4, HYD-5, HYD-6, and HYD-8 would be less than significant.

5.6.10 MITIGATION MEASURES

No mitigation measures are required.

5.6.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant unavoidable adverse impacts related to hydrology and water quality have been identified; impacts would be less than significant.

5.6.12 REFERENCES

City of Santa Fe Springs. (2021a). *Santa Fe Springs 2040 General Plan*. Retrieved from City of Santa Fe Springs: <https://www.reimaginesantafesprings.org/documents#GP>

City of Santa Fe Springs. (2021b). *Santa Fe Springs General Plan and Targeted Zoning Code Update Environmental Impact Report*.
https://www.reimaginesantafesprings.org/files/managed/Document/155/Santa%20Fe%20Springs%20GPTZCU_DEIR_11032021.pdf

Federal Emergency Management Agency. (2024). *FEMA Flood Map Service Center*. Retrieved from <https://msc.fema.gov/portal/home>

Huitt Zoliars. (2024, July). *Low Impact Development (LID) Plan for Santa Fe Springs Industrial*.

John L Hunter and Associates. (2014, June). *Lower San Gabriel River Watershed Management Program*.
https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/san_gabriel/lower_sangabriel/LowerSGR_WMP1.pdf

State Water Resources Control Board. (2020, May). *Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*.
https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.html

Water Replenishment District of Southern California. (2016). *Groundwater Basins Master Plan*. Retrieved from <https://www.wrd.org/files/a784a9e7b/Groundwater+Basins+Master+Plan%2C+2016.pdf>

Waterstone Environmental, Inc. (2022, July 6). *Phase I and Limited Phase II Environmental Assessment Report Subject Property Located at Northwest Corner of Telegraph Road and Santa Fe Springs Road APNs: 8005-015-047, 8005-015-048, 8005-015-049*.

This page intentionally left blank.

5.7 Mineral Resources

5.7.1 INTRODUCTION

This section addresses potential impacts to mineral resources associated with implementation of the proposed Project. The analysis in this section is based, in part, on the following documents and resources:

- *Santa Fe Springs General Plan 2040*, adopted in 2022.
- *Santa Fe Springs General Plan and Targeted Zoning Code Update Environmental Impact Report*, prepared by MIG, Inc, 2021.
- City of Santa Fe Springs Code of Ordinances.

5.7.2 REGULATORY SETTING

5.7.2.1 Federal Regulations

There are no federal regulations concerning mineral resource impacts that are applicable to the proposed Project.

5.7.2.2 State Regulations

Surface Mining and Reclamation Act

The California Department of Conservation has identified sites to which continuing access is important to satisfying mineral production needs of the region and the State, pursuant to the Surface Mining and Reclamation Act of 1975. The relative importance of potential mineral resource sites is indicated by inclusion in one of four mineral resource zones (MRZ) (California Department of Conservation, 2000):

- MRZ-1: Areas where adequate geologic information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- MRZ-2a: Areas underlain by mineral deposits where geologic data indicate that significant measured or indicated resources are present. Areas classified as MRZ-2a contain discovered mineral deposits that are either measured or indicated reserves. Land included in MRZ-2a is of prime importance because it contains known economic mineral deposits.
- MRZ-2b: Areas underlain by mineral deposits where geologic information indicates that significant inferred resources are present. Areas classified as MRZ-2b contain inferred mineral resources as determined by their lateral extension from proven deposits or their similarity to proven deposits. Further exploration could result in upgrading areas classified MRZ-2b to MRZ-2a.
- MRZ-3a: Areas containing known mineral occurrences of undetermined economic significance.
- MRZ-3b: Areas containing inferred mineral occurrences of undetermined economic significance.
- MRZ-4: No information (applies primarily to high-value ores).

5.7.2.3 Local and Regional Regulations

City of Santa Fe Springs General Plan

The City of Santa Fe Springs General Plan contains the following policies related to mineral resources that are applicable to the proposed Project (City of Santa Fe Springs, 2021a):

Land Use Element

Goal LU-3: Clean Industrial Businesses

Policy LU-3.4 Repurpose Petroleum Production Lands. Encourage the remediation and development of properties transitioning from petroleum production.

Policy LU-3.6 Environmental Preservation of Oil Field Sites. Monitor and ensure that efficient and environmentally sound techniques are used in abandoning oil field sites.

Policy LU-3.7 Contaminated Land Remediation. Encourage the proper cleanup and remediation of lands that are contaminated, prioritizing cleanup near and within disadvantaged communities.

Safety Element

Policy S-3.6 Oil Drilling and Production. Promote the gradual consolidation and elimination of oil drilling and production sites to advance the City's climate adaptation and resiliency strategies, local reduction of greenhouse gases, and land use goals.

Policy S-4.1 Petroleum-related Fire Sources. Reduce the sources of significant combustion and urban fires, including active producer well sites, active water injection wells, oil industry tank farms and compression plants, and aboveground tanks storing flammable or combustible liquids.

City of Santa Fe Springs Municipal Code

Chapter 117, Oil and Gas. Chapter 117 enforces the drilling and production of oil, gas, or other hydrocarbon substances on land within the City zoned to permit such operations.

5.7.3 ENVIRONMENTAL SETTING

The Project site is heavily disturbed from existing and previous oil well construction and operational activities. The site contains one, single-story 3,310 SF office building on the western edge of the property and a 1,282 SF canopy structure to the northeast of the building that is used to cover construction equipment. The remainder of the site consists of land that is utilized for oil extraction. The site contains over 100 active, plugged, idle, and/or cancelled oils wells, six pumpjacks along with tanks, pipes, and associated infrastructure.

According to the Santa Fe Springs General Plan and Targeted Zoning Code Updated Environmental Impact Report (EIR) (SCH#2021050193), the city of Santa Fe Springs is primarily designated as MRZ-1 (City of Santa Fe Springs, 2021b). MRZ-1 includes areas where geologic evidence indicates that there are no significant mineral deposits present or likely to exist. The western portion of the City is classified as MRZ-3, meaning that while these areas contain mineral deposits, there is inadequate available data to determine their significance (City of Santa Fe Springs 2021b) or the resources are not economically significant. There are no portions of the City designated MRZ-2 or MRZ-4. As such, there are no areas where adequate

information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists within the Planning Area.

5.7.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- MIN-1 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.
- MIN-2 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.

5.7.5 METHODOLOGY

The impact analysis contained within this section is based on review of existing and previous oil uses of the Project site and the MRZ mapping within the City of Santa Fe Springs, included in the City's General Plan EIR, to determine the MRZ classification of the Project site. In addition, the General Plan Land Use map was used to determine potential areas designated for mineral resource production.

5.7.6 ENVIRONMENTAL IMPACTS

IMPACT MIN-1: THE PROJECT WOULD NOT 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.

Less than Significant Impact.

The City of Santa Fe Springs General Plan EIR defines mineral resources as aggregate resources, or rock, sand, and gravel, energy-producing fields, including oil, gas, and geothermal substances, and related mining operations (City of Santa Fe Springs, 2021b). The Project site contains over 100 active, plugged, idle, and/or cancelled oil wells, with six jacks along with tanks, pipes, and associated infrastructure. As such, the Project site contains mineral resources.

The proposed Project would demolish the existing building and abandon the existing oil wells pursuant to the requirements listed under Sections 117.129 and 117.130 of the Santa Fe Springs Municipal Code. As previously mentioned, the California Department of Conservation MRZ-2 sites are areas with identified mineral resources, and MRZ-4 sites are areas with unknown potential for mineral resources (California Department of Conservation, 2000). According to the City of Santa Fe Springs General Plan EIR, there are no portions of the city that are designated MRZ-2 or MRZ-4. As such, there are no areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists within the city (City of Santa Fe Springs, 2021b). Therefore, the Project site is not identified as containing mineral resources that would be of value to the region and the residents of the state.

The city's General Plan includes Policy S-3.6, to promote the gradual consolidation and elimination of oil drilling and production sites to advance the City's climate adaptation and resiliency strategies, local reduction of greenhouse gases, and land use goals (Santa Fe Springs, 2021a). Therefore, the existing oil wells within the city are not considered of value to the region. Redevelopment of the site and abandonment of the existing oil wells onsite would be consistent with General Policy S-3.6.

Overall, there are no areas of the city, including the Project site, where adequate information indicates that significant mineral deposits are present or with a high likelihood for their presence to exist. As previously

stated, abandonment of the existing oil wells would be pursuant to the requirements listed under Sections 117.129 and 117.130 of the Santa Fe Springs Municipal Code and would be consistent with General Plan Policy S-3.6. Therefore, impacts to mineral resources be less than significant.

IMPACT MIN-2: THE PROJECT WOULD NOT 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 City of Santa Fe Springs General Plan, the City uses the Open Space land use designation for the preservation and management of outdoor recreation, preservation and management of natural resources, and management of production of resources such as oil extraction. The Project site has a land use designation of Industrial. The Industrial land use designation is intended to provide locations for general industrial, manufacturing, outdoor storage and logistics services, and does not delineate a mineral resource recovery site. As such, the Project site land use designation is not compatible with the extraction of mineral resources. According to the Project site land use designation, the Project site area is not planned for future mining. Therefore, the proposed Project would not result in impacts to mineral resource recovery sites delineated on a land use plan.

5.7.7 CUMULATIVE IMPACTS

The proposed Project's potential to result in cumulatively considerable impacts to mineral resources are analyzed in conjunction with other projects located in the City of Santa Fe Springs General Plan area. A majority of the land within the city is designated as MRZ-1, and no land is designated for mineral resource recovery within the General Plan. Overall, there are no areas of the city, including the Project site, where adequate information indicates that significant mineral deposits are present or with a high likelihood for their presence to exist. As such, closeout of existing oil wells would not cumulatively result in impacts related to loss of a mineral resource. Thus, buildout of the proposed Project would not result in cumulatively considerable impacts to mineral resources.

5.7.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

None.

Plans, Programs, or Policies

None.

5.7.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

MIN-1 would be less than significant; and MIN-2 would be no impact.

5.7.10 MITIGATION MEASURES

No mitigation measures are required.

5.7.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to MIN-1 would be less than significant and MIN-2 would be no impact.

5.7.12 REFERENCES

City of Santa Fe Springs. (2021a). *Santa Fe Springs 2040 General Plan*. Retrieved from City of Santa Fe Springs: <https://www.reimaginesantafesprings.org/documents#GP>

City of Santa Fe Springs. (2021b). *Santa Fe Springs General Plan and Targeted Zoning Code Update Environmental Impact Report*. Retrieved from Re-Imagine Santa Fe Springs 2040 General Plan: <https://www.reimaginesantafesprings.org/documents#GP>

City of Santa Fe Springs. (2024). *Santa Fe Springs Code of Ordinances*. Retrieved from City of Santa Fe Springs: https://codelibrary.amlegal.com/codes/santafesprings/latest/santafesprings_ca/0-0-0--1073665416

California Department of Conservation. (2000). *California Surface Mining and Reclamation Policies and Procedures – Guidelines for Classification and Designation of Mineral Lands*. <https://www.conservation.ca.gov/smgb/Guidelines/Documents/ClassDesig.pdf>

This page intentionally left blank.

5.8 Noise

5.8.1 INTRODUCTION

This EIR section evaluates the potential noise and vibration impacts that could result from implementation of the proposed Project. It discusses the existing noise environment within and around the Project site, as well as the regulatory framework for regulation of noise. This section analyzes the effect of the proposed Project on the existing ambient noise environment during demolition, construction, and operational activities and evaluates the proposed Project's noise effects for consistency with relevant local agency noise policies and regulations. The analysis in this section also addresses impacts related to groundborne vibration. Information in this section is based on the following:

- *Santa Fe Springs General Plan 2040*, adopted in 2022
- *Santa Fe Springs General Plan and Targeted Zoning Code Update Environmental Impact Report*, prepared by MIG, Inc, 2021
- City of Santa Fe Springs Development Code
- *Noise and Vibration Impact Analysis*, prepared by Urban Crossroads, August 2024 (Appendix G)

Noise and Vibration Terminology

Various noise descriptors are utilized in this EIR analysis, and are summarized as follows:

dB: Decibel, the standard unit of measurement for sound pressure level.

dBA: A-weighted decibel, an overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.

Leq: The equivalent sound level, which is used to describe noise over a specified period of time, typically 1 hour, in terms of a single numerical value. The Leq of a time-varying signal and that of a steady signal are the same if they deliver the same acoustic energy over a given time. The Leq may also be referred to as the average sound level.

Lmax: The instantaneous maximum noise level experienced during a given period of time.

Lmin: The instantaneous minimum noise level experienced during a given period of time.

Lx: The sound level that is equaled or exceeded "x" percent of a specified time period. The "x" thus represents the percentage of time a noise level is exceeded. For instance, L50 and L90 represents the noise levels that are exceeded 50 percent and 90 percent of the time, respectively.

Ldn: Also termed the "day-night" average noise level (DNL), Ldn is a measure of the average of A-weighted sound levels occurring during a 24-hour period, accounting for the greater sensitivity of most people to nighttime noise by weighting noise levels at night (penalizing" nighttime noises). Noise between 10:00 p.m. and 7:00 a.m. is weighted by adding 10 dBA to take into account the greater annoyance of nighttime noises.

CNEL: The Community Noise Equivalent Level, which, similar to the Ldn, is the average A-weighted noise level during a 24-hour day that is obtained after an addition of 5 dBA to measured noise levels between the hours of 7:00 p.m. to 10:00 p.m. and after an addition of 10 dBA to noise levels between the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

Ambient Noise Level: The background noise level associated with a given environment at a specified time and is usually a composite of sound from many sources from many directions.

Effects of Noise

Noise is generally loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity that is a nuisance or disruptive. The effects of noise on people can be placed into four general categories:

- Subjective effects (e.g., dissatisfaction, annoyance);
- Interference effects (e.g., communication, sleep, and learning interference);
- Physiological effects (e.g., startle response); and
- Physical effects (e.g., hearing loss).

Although exposure to high noise levels has been demonstrated to cause physical and physiological effects, the principal human responses to typical environmental noise exposure are related to subjective effects and interference with activities. Interference effects refer to interruption of daily activities and include interference with human communication activities, such as normal conversations, watching television, telephone conversations, and interference with sleep. Sleep interference effects can include both awakening and arousal to a lesser state of sleep. Regarding the subjective effects, the responses of individuals to similar noise events are diverse and are influenced by many factors, including the type of noise, the perceived importance of the noise, the appropriateness of the noise to the setting, the duration of the noise, the time of day and the type of activity during which the noise occurs, and individual noise sensitivity.

In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will be to those hearing it. Regarding increases in A-weighted noise levels, the following relationships generally occur:

- Except in carefully controlled laboratory experiments, a change of 1 dBA cannot be perceived.
- Outside of the laboratory, a 3-dBA change in noise levels is considered a barely perceivable difference.
- A change in noise levels of 5 dBA is considered a readily perceivable difference.
- A change in noise levels of 10 dBA is subjectively heard as doubling of the perceived loudness.

Noise Attenuation

Stationary point sources of noise, including mobile sources such as idling vehicles, attenuate (lessen) at a rate of 6 dBA per doubling of distance from the source over hard surfaces to 7.5 dBA per doubling of distance from the source over hard surfaces, depending on the topography of the area and environmental conditions (e.g., atmospheric conditions, noise barriers [either vegetative or manufactured]). Thus, a noise measured at 90 dBA 50 feet from the source would attenuate to about 84 dBA at 100 feet, 78 dBA at 200 feet, 72 dBA at 400 feet, and so forth. Widely distributed noise, such as a large industrial facility spread over many acres or a street with moving vehicles, would typically attenuate at a lower rate, approximately 4 to 6 dBA per doubling of distance from the source.

Hard sites are those with a reflective surface between the source and the receiver, such as asphalt or concrete surfaces or smooth bodies of water. No excess ground attenuation is assumed for hard sites and the changes in noise levels with distance (drop-off rate) is simply the geometric spreading of the noise from the source. Soft sites have an absorptive ground surface such as soft dirt, grass, or scattered bushes and trees. In addition to geometric spreading, an excess ground attenuation value of 1.5 dBA (per doubling distance) is normally assumed for soft sites. Line sources (such as traffic noise from vehicles) attenuate at a rate between 3 dBA for hard sites and 4.5 dBA for soft sites for each doubling of distance from the reference measurement.

Fundamentals of Vibration

Vibration is energy transmitted in waves through the ground or man-made structures. These energy waves generally dissipate with distance from the vibration source. There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. VdB serves to reduce the range of numbers used to describe human response to vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment.

The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

5.8.2 REGULATORY SETTING

5.8.2.1 Federal Regulations

Federal Transit Administration

Because the City does not have daytime construction noise level limits for activities that occur within the specified hours of the City of Santa Fe Springs Municipal Code to determine potential CEQA noise impacts, construction noise was assessed using criteria from the 2018 Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment Manual* (FTA Manual). Table 5.8-1 shows the FTA's detailed assessment construction noise criteria based on the composite noise levels per construction phase.

Table 5.8-1: Federal Construction Noise Criteria

Land Use	Daytime 1-hour Leq (dBA)
Residential	80
Commercial	85
Industrial	90

dBA = A-weighted decibels

Leq = equivalent continuous sound level

Source: Appendix G.

5.8.2.2 State Regulations

Caltrans Vibration Guidance Manual

There are no vibration standards that are specifically applicable to the proposed Project, hence, California Department of Transportation's (Caltrans) Transportation and Construction Vibration Guidance Manual Table 19 (Table 5.8-2, *Vibration Screening Standards*, in this document) guidelines are used as a screening tool for assessing the potential for temporary construction-related impacts at adjacent building locations. The nearest noise-sensitive buildings adjacent to the Project site can best be described as "older residential structures" with a maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec), as shown in Table 5.8-2 below.

Table 5.8-2: Vibration Screening Standards

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: Caltrans, 2020. Table 19.

Title 24, California Building Code

State regulations related to noise include requirements for the construction of new hotels, motels, apartment houses, and dwellings other than detached single-family dwellings that are intended to limit the extent of noise transmitted into habitable spaces. These requirements are collectively known as the California Noise Insulation Standards and are found in California Code of Regulations, Title 24 (known as the Building Standards Administrative Code), Part 2 (known as the California Building Code), Appendix Chapters 12 and 12A. For limiting noise transmitted between adjacent dwelling units, the noise insulation standards specify the extent to which walls, doors, and floor ceiling assemblies must block or absorb sound. For limiting noise from exterior sources, the noise insulation standards set forth an interior standard of DNL 45 dBA in any habitable room and, where such units are proposed in areas subject to noise levels greater than DNL 60 dBA, require an acoustical analysis demonstrating how dwelling units have been designed to meet this interior standard. If the interior noise level depends upon windows being closed, the design for the structure must also specify a ventilation or air conditioning system to provide a habitable interior environment.

The mandatory measures for non-residential buildings state that new construction shall provide an interior noise level that does not exceed an hourly equivalent level of 50 dBA Leq in occupied areas during any hour of operation. Title 24 standards are enforced through the City's building permit application process.

5.8.2.3 Local and Regional Regulations

City of Santa Fe Springs General Plan

The Noise Element of the City's General Plan provides the City's goals and strategies related to noise, including the land use compatibility guidelines for community exterior noise environments. Table N-1 from the City's General Plan (Table 5.8-3, *Noise Land Use Compatibility Guidelines*, of this document) outlines the noise standards for land use compatibility.

Table 5.8-3: Noise Land Compatibility Guidelines

Noise Receptor (Land Use)	Maximum Exterior Noise Level from Property Line (CNEL)
Residential (Low Density, Multi-Family, Mobile Home Parks, Mixed-Use, Housing Developments, Emergency Shelters/Low-Barrier Navigation Centers, Residential Care Facilities)	65; 70 for mixed-use development
Transient Lodging (Motels/Hotels)	70
Schools, Libraries, Churches, Hospitals/Medical Facilities, Nursing Homes, Community Care Facilities, Museums	65
Theaters, Auditoriums	80
Playgrounds, Parks	70
Office Buildings, Business Commercial and Professional	70
Industrial, Manufacturing, and Utilities	75

Source: Santa Fe Springs, 2022. Noise Element. Table N.

The following are goals and policies in the General Plan that are applicable to the Project:

Goal N-1 Reduced Traffic and Train Noise

Policy N-1.1 Freeway and Roadway Noise. Incorporate into transportation planning programs noise reduction measures that can reduce noise impacts on residential neighborhoods from surface transportation sources, including such features as noise barriers and walls, insulation, green buffers and berms, and paving technologies that reduce vehicle noise.

Policy N-2.2 Land Use Compatibility. Include the noise/land use compatibility standards of Table N-1 and compliance with the Municipal Code noise regulations as part of development review.

Policy N-2.4 Truck Access. Require that site design for new industrial and commercial development and remodels address proximity to residential uses by locating automobile and truck access at the maximum practical distance from residential uses and with adequate noise shielding provided to achieve noise standards.

Goal LU-1 Balanced Community of Thriving Businesses, Healthy, Neighborhoods, Excellent Community Facilities, and Interesting Places

Policy LU-1.5 Land Use Transitions. Apply appropriate screening, buffers, transitional uses, and other controls to transition from industrial and commercial uses to any adjacent residential uses and thus reduce potential noise and air pollution impacts.

City of Santa Fe Springs Municipal Code

The City of Santa Fe Springs Municipal Code, Section 155.424, *Permitted Noise Levels*, establishes exterior noise level limits by receiving land uses. The City of Santa Fe Springs Municipal Code base exterior noise level standards are shown in Table 5.8-4.

Table 5.8-4: City of Santa Fe Springs Municipal Code Operational Noise Level Standards

Jurisdiction	Receiving Land Use	Exterior Noise Level Standard (dBA L_{eq}) ²	
		Daytime	Nighttime
City of Santa Fe Springs	Any school, church, or hospital	45	45
	A-1, R-1 or R-3 Zone	50	45
	C-1 or C-4 Zone	60	55
	ML, PF or BP Zone	60	60
	M-1 or M-2 Zone	70	70

Notes: L_{eq} represents a steady state sound level containing the same total energy as a time varying signal over a given sample period. "Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.

Source: City of Santa Fe Springs Municipal Code, Section 155.424

For noise-sensitive residential properties, Municipal Code Section 155.424 identifies operational noise level limits of 50 dBA L_{50} during the daytime hours and 45 dBA L_{50} during the nighttime hours. In addition, Municipal Code Section 155.424 (B) indicates that if the existing ambient noise levels already exceed any of the exterior noise level limit categories, then the standard can be adjusted to reflect the ambient conditions.

Municipal Code Section 155.425, *Special Noise Sources*, contains provisions that restrict construction between the hours of 7:00 p.m. and 7:00 a.m. within a residential zone or within a radius of 500 feet from a residential zone.

5.8.3 ENVIRONMENTAL SETTING

5.8.3.1 Existing Noise Levels

To assess existing noise levels of the environment, long-term (24-hour) noise level measurements were conducted on May 30, 2024, at three locations as shown on Figure 5.8-1, *Noise Measurement Locations*. The three noise measurement locations are consistent with the sensitive receivers described below.

The background ambient noise levels in the Project area are dominated by the transportation-related noise associated with Telegraph Road and Santa Fe Spring Road. Table 5.8-5, *Summary of 24-Hour Ambient Noise Level Measurements*, provides a summary of the hourly daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at each noise level measurement location. These daytime and nighttime noise levels represent an average of all noise levels observed during these time periods. The existing average noise levels range from 66.9 dBA L_{eq} to 68.5 dBA L_{eq} during daytime hours and from 64.0 dBA L_{eq} to 65.7 dBA L_{eq} during nighttime hours.

Table 5.8-5: Summary of 24-Hour Ambient Noise Level Measurements

Location ¹		Average Noise Level (dBA L_{eq})	
		Daytime ²	Nighttime ³
L-1	South of the Project site near the residence at 10404 Sycamore Lane.	67.8	65.1
L-2	South of the Project site near the residence at 1410 Orchid Way.	68.5	65.7
L-3	South of the Project site near the residence at 10404 Satinwood Court.	66.9	64.0

Note: Noise measurements were conducted on May 30, 2023.

¹ See Figure 5.8-1 for the noise level measurement locations;

² Daytime Noise Levels = noise levels during the hours from 7:00 a.m. to 10:00 p.m.

³ Nighttime Noise Levels = noise levels during the hours from 10:00 p.m. to 7:00 a.m.

dBA = A-weighted decibels

L_{eq} = equivalent continuous sound level

Source: Noise and Vibration Impact Analysis (Appendix G).

5.8.3.2 Existing Vibration

Aside from periodic construction work that may occur in the vicinity of the Project area, other sources of groundborne vibration include heavy-duty trucks, such as garbage trucks, on area roadways. Trucks traveling at a distance of 50 feet typically generate groundborne vibration velocity levels of around 63 VdB (approximately 0.006 in/sec PPV) and could reach 72 VdB (approximately 0.016 in/sec PPV) when trucks pass over bumps in the road (FTA, 2006).

5.8.3.3 Existing Airport Noise

The closest airport is the Long Beach Airport (LGB) located roughly 9.7 miles southwest of the Project site. As such, the Project site is not exposed to excessive noise levels from airport operations.

5.8.3.4 Sensitive Receptors

Noise sensitive receptors are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include residences, schools, hospitals, and recreation areas. Three locations were identified as representative locations for this analysis, as shown in Figure 5.8-2, *Receiver Locations*, and described below:

R1: Location R1 represents the existing noise sensitive residence at 10404 Sycamore Lane, approximately 358 feet south of the Project site.

R2: Location R2 represents the existing noise sensitive residence at 1410 Orchid Way, approximately 437 feet south of the Project site.

R3: Location R3 represents the existing noise sensitive residence at 10404 Satinwood Court, approximately 474 feet south of the Project site.

Other sensitive land uses in the Project study area that are located at a greater distance would experience lower noise levels than those presented in this report due to the additional attenuation from distance and the shielding of intervening structures.

This page intentionally left blank.

Noise Measurement Locations



This page intentionally left blank.

Receiver Locations



This page intentionally left blank.

5.8.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to result in:

- NOI-1 Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- NOI-2 Generation of excessive groundborne vibration or groundborne noise levels.
- NOI-3 For a project located within the vicinity of a private airstrip or 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, expose people residing or working in the project area to excessive noise levels.

5.8.4.1 Construction Noise and Vibration

A potentially significant noise impact could occur if Project related construction activities:

- Occur between the hours of 7:00 p.m. of one day and 7:00 a.m. of the next day, within a residential zone, or within a radius of 500 feet therefrom (SFS Municipal Code Section 155.425, *Special Noise Sources*); or
- Create noise levels which exceed the acceptable noise level thresholds of 80 dBA L_{eq} at the nearby sensitive receiver locations (*FTA Transit Noise and Vibration Impact Assessment Manual*);

A potentially significant vibration impact could occur if Project-related construction activities generate vibration levels which exceed the Caltrans Transportation and Construction Vibration Manual. The nearest noise sensitive buildings to the Project site can be categorized as “older residential structures,” which have a maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec), per the Caltrans Transportation and Construction Vibration Manual.

5.8.4.2 Roadway Vehicular Noise

The City of Santa Fe Springs has not established noise standards for traffic-related noise; therefore, for purposes of this CEQA analysis, the Federal Interagency Committee on Noise (FICON) guidance has been used. The FICON recommendations are based on studies that relate aircraft noise levels to the percentage of persons highly annoyed by aircraft noise. Although the FICON recommendations were specifically developed to assess aircraft noise impacts, these recommendations are often used in environmental noise impact assessments involving the use of cumulative noise exposure metrics, such as the average-daily noise level (CNEL) and equivalent continuous noise level (Leq).

The approach used in this noise study recognizes that there is no single noise increase that renders a noise impact significant, based on a 2008 California Court of Appeal ruling on *Gray v. County of Madera*. For example, if the ambient noise environment is quiet (<60 dBA) and the new noise source greatly increases the noise levels, an impact may occur if the noise criteria may be exceeded. Therefore, for the purposes of this analysis, a potentially significant impact would occur when the noise levels at existing noise sensitive land uses (e.g., residential, etc.):

- Are less than 60 dBA CNEL and the Project creates a readily perceptible 5 dBA CNEL or greater Project-related noise level increase; or

- Range from 60 to 65 dBA CNEL and the Project creates a barely perceptible 3 dBA CNEL or greater Project-related noise level increase; or
- Already exceeds 65 dBA CNEL and the Project creates a community noise level impact of greater than 1.5 dBA CNEL.

Based on existing noise levels, 1.5 dBA CNEL has been applied as the vehicle noise threshold for sensitive land uses. The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. For example, if the ambient noise environment is very quiet and a new noise source substantially increases localized noise levels, a perceived impact may occur even though the numerical noise threshold might not be exceeded.

5.8.4.3 Onsite Operational Noise

A potentially significant impact regarding onsite operational noise of the Project would occur if Project-related operational (stationary source) noise levels:

- Exceed the exterior 50 dBA L_{eq} daytime or 45 dBA L_{eq} nighttime noise level standards (City of Santa Fe Springs Municipal Code, Section 155.424.).

5.8.5 METHODOLOGY

5.8.5.1 Construction Noise

To identify the temporary construction noise contribution to the existing ambient noise environment, the construction noise levels anticipated from usage of construction equipment needed to implement the proposed Project were identified. The City of Santa Fe Springs Municipal Code limits construction hours to reduce noise but does not establish numeric maximum acceptable construction source noise levels at potentially affected receivers, which would allow for a quantified determination of what CEQA constitutes a *substantial temporary or periodic noise increase*. Therefore, a numerical construction threshold based on the FTA Manual is used for analysis of daytime construction impacts and has been used in past City CEQA documents for noise analysis purposes. The FTA considers a daytime exterior construction noise level of 80 dBA L_{eq} as a reasonable threshold for noise sensitive residential land use and 90 dBA L_{eq} for industrial uses. The construction noise levels are compared against the FTA thresholds to assess the level of significance associated with temporary construction noise level impacts.

5.8.5.2 Operational Noise

The primary source of noise associated with the operation of the proposed Project would be from loading dock activity, roof-top air conditioning units, and parking lot vehicle movements. The expected roadway noise level increases from vehicular/truck traffic were calculated using the Federal Highway Administration Traffic Noise Prediction Model (FHWA-RD-77 108) and the average daily traffic volumes from the Traffic Impact Analysis prepared for the proposed Project (Appendix L).

As detailed in Section 5.9, *Transportation*, the proposed Project is anticipated to generate approximately 1,394 daily trips, including 130 AM (99 inbound and 31 outbound) and 138 PM (40 inbound and 98 outbound) peak hour trips. The increase in noise levels generated by the vehicular/truck trips has been quantitatively estimated and compared to the applicable noise standards and thresholds of significance listed previously.

Stationary sources of noise would include heating, ventilation, air conditioning (HVAC) equipment, truck deliveries, and loading and unloading activities. The CadnaaA, a spatial noise prediction model, was used to determine the future noise impacts from Project operations to the noise sensitive uses. CadnaaA incorporates the site topography, buildings, and barriers in its calculations to predict outdoor noise levels. To provide a conservative analysis (worst case scenario), the Noise Impact Analysis for the Project (Appendix G) assumed that operations would occur 24 hours per day, seven days per week. Additionally, the Noise Impact Analysis assumed the worst-case scenario of all loading dock activity, tractor trailer storage activity, roof-top air conditioning units, parking lot vehicle movements, trash enclosure activity and truck movements all operating at the same time. These sources of noise activity would likely vary throughout the day. Additionally, it is assumed that all loading dock activity is associated with cold storage facilities because the noise generated by cold storage loading dock activity can be slightly higher due to the use of refrigerated trucks or reefers. Consistent with similar warehouse and industrial uses, the Project business operations would be conducted primarily within the enclosed buildings, except for traffic movement, parking, and loading and unloading of trucks. Parking activities are expected to take place during the full hour throughout the daytime and evening hours.

The projected use at this time is unknown because the building tenants are unknown.

5.8.5.3 Vibration

Aside from noise levels, groundborne vibration would also be generated during construction of the Project by various construction-related activities and equipment; and could be generated by truck traffic traveling to and from the Project site. The potential groundborne vibration levels resulting from construction activities occurring from the proposed Project were estimated by data published by the FTA. Thus, the groundborne vibration levels generated by these sources have also been quantitatively estimated and compared to the applicable thresholds of significance listed previously.

5.8.6 ENVIRONMENTAL IMPACTS

IMPACT NOI-1: THE PROJECT WOULD NOT RESULT IN GENERATION OF A SUBSTANTIAL TEMPORARY OR PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN THE VICINITY OF THE PROJECT IN EXCESS OF STANDARDS ESTABLISHED IN THE LOCAL GENERAL PLAN OR NOISE ORDINANCE, OR APPLICABLE STANDARDS OF OTHER AGENCIES.

Construction

Less than Significant Impact. Potential noise impacts associated with the construction of the proposed Project would be from construction-generated vehicular traffic on the nearby roadways and from noise generated from construction equipment onsite. Construction crew commutes and the transport of construction equipment and materials to the site for the proposed Project would incrementally increase noise levels on access roads leading to the site. As discussed in Section 5.9, *Transportation*, the proposed Project would result in an additional 1,972 vehicles in passenger car equivalent (PCE) volume, during operations of the Project (Appendix G). During operations, sensitive receivers (roadway segments 2, 5, 8, and 9 in Table 5.8-8) would experience an offsite traffic noise level increase of 0.0 in both the existing and opening years, which is below the threshold of 1.5 dBA noise level increase, as shown in Table 5.8-8. Operational traffic noise impacts from Project-related traffic on offsite sensitive receptors are less than significant (see Operational discussion below). Construction vehicle trips are shown in Table 10 of the Air Quality, Energy, and Greenhouse Gas Impact Analysis, included as Appendix B. Construction vehicle trips are a summary of the worker, vendor, and hauling vehicles used throughout the Project's construction phases. As shown, traffic volumes during construction are expected to be less than operational traffic volumes. Therefore, short-term,

construction-related impacts associated with worker commute and equipment transport to the Project site would be less than significant

Noise generated by construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators that can reach high levels when combined. Construction is expected to occur in the following stages: well closure, demolition, site preparation, grading, building construction, paving, and architectural coating. Table 5.8-6 lists typical construction equipment noise levels recommended for noise impact assessments, based on a distance of 50 feet between the equipment and a noise receptor, taken from the Federal Highway Administration's (FHWA) Roadway Construction Noise Model (2006). The noise level at each construction phase was calculated using the reference information from Table 5.8-6 and the construction equipment list. The Project construction composite noise levels at a distance of 50 feet would range from 76.2 dBA Leq to 86.8 dBA Leq with the highest noise levels occurring during the demolition/ well equipment removal and site preparation phases.

Table 5.8-6: Construction Reference Noise Levels

Construction Stage	Reference Construction Equipment ¹	Reference Noise Level at 50 feet (dBA _{Leq})	Composite Reference Noise Level (dBA _{Leq}) ²	Reference Power Level (dBA _{L_w}) ³
Demolition/Well Equipment Removal	Concrete Saw	83	86.8	118.4
	Grapple (on backhoe)	83		
	Gradall	79		
Site Preparation	Tractor	80	84.0	115.6
	Backhoe	74		
	Grader	81		
Grading	Scraper	80	83.3	114.9
	Excavator	77		
	Dozer	78		
Building Construction	Crane	73	80.6	112.2
	Generator	78		
	Front End Loader	75		
Paving	Paver	74	77.8	109.5
	Dump Truck	72		
	Roller	73		
Architectural Coating	Man Lift	68	76.2	107.8
	Compressor (air)	74		
	Generator (<25kVA)	70		

Note: ¹ FHWA Road Construction Noise Model. ² Represents the combined noise level for all equipment assuming they operate at the same time consistent with FTA Transit Noise and Vibration Impact Assessment guidance.

³ Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings.

Source: Appendix G.

Per City of Santa Fe Springs Municipal Code Section 155.425(B), noise sources associated with construction activities are exempt from the City's established noise standards if the activities do not take place within a

residential zone or within a radius of 500 feet from a residential zone between the hours of 7:00 p.m. of any one day and to 7:00 a.m. of the next day. The proposed Project's construction activities would occur pursuant to these regulations. Thus, the construction activities would be in compliance with the City's construction-related noise standards.

Construction noise would be temporary in nature as the operation of each piece of construction equipment would not be constant throughout the construction day, and equipment would be turned off when not in use. The typical operating cycle for a piece of construction equipment involves one or two minutes of full power operation followed by three or four minutes at lower power settings. The construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators.

While construction noise will vary, it is expected that the highest construction noise levels at the nearest residential uses to the south of the Project site would reach between 63.4 and 64.2 dBA Leq during daytime hours (see Table 5.8-7).

Table 5.8-7: Construction Noise Levels at Nearest Receptors

Receptor (Location) ¹	Construction Noise Level (dBA Leq)		
	Highest Construction Noise Levels ²	Threshold ³	Threshold Exceeded?
R1	64.2	80	No
R2	64.2	80	No
R3	63.4	80	No

Note: ¹ Construction noise receiver locations are shown on Figure 5.8-2.

² Highest construction noise level calculations based on distance from the construction noise source activity to the nearest receiver locations as shown on Table 5.8-6.

³ FTA considers a daytime exterior construction noise level of 80 dBA Leq as a reasonable threshold for noise sensitive residential land use.

Source: Noise and Vibration Impact Analysis, 2024 (Appendix G)

These predicted noise levels would only occur when all construction equipment is operating simultaneously, and therefore, are assumed to be rather conservative in nature. While construction-related short-term noise levels have the potential to be higher than existing ambient noise levels in the Project area under existing conditions, the noise impacts would no longer occur once Project construction is completed.

As construction noise from the proposed Project at the nearby receptor locations would range from 63.4 to 64.2 dBA Leq, construction-related noise impacts would remain well below the 80 dBA Leq 1-hour construction noise level criteria for daytime construction noise for and residential uses. Therefore, impacts related to construction noise would be less than significant.

Operation

Less than Significant Impact. The proposed Project would consist of demolition of one existing building onsite, abandonment of the existing oil wells onsite, and development of two new warehouse buildings and two underground onsite infiltration trenches.

Building 1 would include a total of 345 parking stalls, located along the west, north, and east sides of the building. In addition, Building 1 would include 40 dock doors and 48 truck trailer stalls located along the south side of the building. Building 2 would include a total of 339 parking stalls, located along the west, south, and east sides of the building. In addition, Building 2 would include 36 dock doors and 33 truck trailer stalls located along the north side of the building. Potential noise impacts associated with the operations of the proposed Project would be from project-generated vehicular traffic on the nearby roadways and from onsite activities, which have been analyzed separately below.

Traffic Noise Impacts

Vehicle noise is a combination of the noise produced by the engine, exhaust, and tires. The level of traffic noise depends on three primary factors: (1) the volume of traffic; (2) the speed of traffic; and (3) the number of trucks in the flow of traffic. Table 5.8-8 provides the traffic noise levels for the opening year traffic with the proposed Project. These noise levels represent the worst-case scenario, which assumes no shielding is provided between the traffic and the location where the noise contours are drawn. The opening year without Project exterior noise levels are expected to range from 58.7 to 72.4 dBA CNEL. The opening year with Project conditions are expected to range from 68.8 to 73.6 dBA CNEL, and increase ranging from 0.0 to 10.1 dBA CNEL.

Although the traffic noise level would increase up to 10.1 dBA CNEL, there are no sensitive receivers located in areas that would experience increases over 1.5 dBA. In addition, the Project-related offsite traffic noise level increase is largely due to the low traffic volumes that currently exist. Sensitive receivers (roadway segments 2, 5, 8, and 9 in Table 5.8-8) would experience an offsite traffic noise level increase 0.0, which is below the threshold of 1.5 dBA noise level increase. Therefore, traffic noise impacts from Project-related traffic on offsite sensitive receptors would be less than significant, and no mitigation measures are required.

Table 5.8-8: Opening Year (2026) Traffic Noise Levels Without Proposed Project and With Proposed Project

ID	Roadway Segment	Receiving Land Use	Opening Year 2026 – CNEL at Receiving Land Use (dBA)			Incremental Noise Level Increase Threshold?	
			No Project	With Project	Project Addition	Limit	Exceed?
1	Norwalk Blvd. n/o Telegraph Rd.	Non-Sensitive	69.3	71.3	2.0	n/a	No
2	Norwalk Blvd. s/o Telegraph Rd.	Sensitive	69.5	69.5	0.0	1.5	No
3	Santa Fe Springs Rd. s/o Los Nietos Rd.	Non-Sensitive	71.1	71.1	0.0	n/a	No
4	Santa Fe Springs Rd. n/o Telegraph Rd.	Non-Sensitive	71.1	71.2	0.1	n/a	No
5	Santa Fe Springs Rd. s/o Telegraph Rd.	Sensitive	70.7	70.7	0.0	1.5	No
6	Telegraph Rd. w/o Heritage Park Dr.	Non-Sensitive	72.4	73.6	1.2	n/a	No
7	Telegraph Rd. w/o Norwalk Blvd.	Non-Sensitive	72.2	73.4	1.2	n/a	No
8	Telegraph Rd. e/o Norwalk Blvd.	Sensitive	71.9	71.9	0.0	1.5	No
9	Telegraph Rd. w/o Santa Fe Springs Rd.	Sensitive	72.2	72.2	0.0	1.5	No
10	Telegraph Rd. e/o Santa Fe Springs Rd.	Non-Sensitive	71.9	71.9	0.0	n/a	No
11	Telegraph Rd. e/o Greenleaf Av.	Non-Sensitive	70.3	70.3	0.0	n/a	No
12	Hawkins St. e/o Norwalk Blvd.	Non-Sensitive	58.7	68.8	10.1	n/a	No

Notes: ADT = average daily traffic; CNEL= Community Noise Equivalent Level; dBA = A-weighted decibels ft = foot/feet
Source: Appendix G.

Offsite Stationary Noise Impacts

Adjacent offsite land uses would be potentially exposed to stationary-source noise impacts from the proposed loading dock activity, tractor trailer storage activity, roof-top air conditioning units, parking lot vehicle movements, trash enclosure activity and truck movements. To provide a conservative analysis, it is assumed that the Project would be operational 24 hours per day, seven days per week.

Table 5.8-9 shows the proposed Project operational noise levels during the daytime hours of 7:00 a.m. to 10:00 p.m. The daytime hourly noise levels at the offsite receiver locations are expected to range from 38.2 to 42.6 dBA Leq at the existing noise sensitive receiver locations. Table 5.8-10 shows the Project operational noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. The nighttime hourly noise levels at the offsite receiver locations are expected to range from 37.3 to 41.8 dBA Leq at the existing noise sensitive receiver locations.

Table 5.8-9: Daytime Project Operational Noise Levels

Noise Source	Operational Noise Levels by Receiver Location (dBA Leq)		
	R1	R2	R3
Loading Dock Activity	33.2	33.2	39.9
Tractor Trailer Storage Activity	22.2	22.3	31.3
Roof-Top Air Conditioning Units	34.2	35.6	36.3
Parking Lot Vehicle Movements	32.1	31.1	29.6
Trash Enclosure Activity	12.2	14.1	32.0
Truck Movements	14.9	15.0	21.6
Total (All Noise Sources)	38.2	38.6	42.6

Source: Appendix G

Table 5.8-10: Nighttime Project Operational Noise Levels

Noise Source	Operational Noise Levels by Receiver Location (dBA Leq)		
	R1	R2	R3
Loading Dock Activity	33.2	33.2	39.9
Tractor Trailer Storage Activity	22.2	22.3	31.3
Roof-Top Air Conditioning Units	31.8	33.2	33.9
Parking Lot Vehicle Movements	32.1	31.1	29.6
Trash Enclosure Activity	8.2	10.1	28.1
Truck Movements	14.9	15.0	21.6
Total (All Noise Sources)	37.3	37.5	41.8

Source: Appendix G

Dock activity includes truck idling, reefer activity (refrigerator truck/cold storage), deliveries, backup alarms, trailer docking including a combination of tractor trailer semi-trucks, two-axle delivery trucks, and background operation activities. Since the noise levels generated by cold storage loading dock activity can be slightly higher due to the use of refrigerated trucks or reefers, the reference noise level conservatively assumed that all loading dock activity is associated with cold storage facilities. Additional background noise sources included truck pass-by noise, truck drivers talking to each other next to docked trucks, and air brake release noise when trucks park.

Tractor trailer storage activity includes truck idling, backup alarms, tractor trailer movements and storage activities. The reference noise measurement included a semi-truck with trailer pass-by event, background switcher cab trailer towing, drop-off, idling, and backup alarm events. Tractor trailer activity is estimated during all the daytime, evening, and nighttime hours.

The Project would include seven rooftop HVAC units on each building (14 total). The HVAC equipment is expected to operate for an average of 39 minutes per hour during the daytime hours, and 28 minutes per hour during the nighttime hours. These operating conditions reflect peak summer cooling requirements with measured temperatures approaching 96 degrees Fahrenheit (°F) with average daytime temperatures of 82°F.

Parking lot vehicle movement activities are expected to take place throughout the daytime and evening hours. The parking lot noise levels are mainly due to cars pulling in and out of parking spaces in combination with car doors opening and closing.

The Project is estimated to have eight trash enclosures near the proposed trailer stalls. The trash enclosure noise levels describe metal gates opening and closing, metal scraping against concrete floor sounds, dumpster movement on metal wheels, and trash dropping into the metal dumpster.

Table 5.8-11 shows operational noise levels associated with the Project compared to the City of Santa Fe Springs exterior noise level standards. As shown, Project operational noise levels would range from 38.2 dBA Leq to 42.6 dBA Leq during the daytime and from 37.3 dBA Leq to 41.8 dBA Leq during the nighttime. Operational noise levels would not exceed the City of Santa Fe Springs exterior noise level standards of 50 dBA Leq during the daytime and 45 dBA Leq during the nighttime. Therefore, the stationary operational noise impacts would be less than significant.

Table 5.8-11: Operational Noise Level Compliance

Receiver Location	Measurement Location	Project Operational Noise Levels (dBA Leq)		Noise Level Standards (dBA Leq)		Noise Level Standards Exceeded?	
		Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	L1	38.2	37.3	50	45	No	No
R2	L2	38.6	37.5	50	45	No	No
R3	L3	42.6	41.8	50	45	No	No

Note: "Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.
Source: Appendix G

IMPACT NOI-2: THE PROJECT WOULD NOT RESULT IN GENERATION OF EXCESSIVE GROUND BORNE VIBRATION OR GROUND BORNE NOISE LEVELS.

Construction

Less than Significant Impact. Construction activities for development of the proposed Project would include excavation and grading activities, which have the potential to generate low levels of groundborne vibration. People working in close proximity to the construction could be exposed to the generation of excessive groundborne vibration or groundborne noise levels related to construction activities. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Site ground vibrations from construction activities very rarely reach the levels that can damage structures, but they can be perceived in the audible range and be felt in buildings very close to a construction site.

The excavation and grading activities that are required for construction of the Project can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. Table 5.8-12 shows the PPV values at 25 ft from the construction vibration source. The primary source of vibration during construction would be from the operation of a vibratory roller. As shown in Table 5.8-12, a vibratory roller would create a vibration level of 0.210 inch per second PPV at 25 feet.

Table 5.8-12: Vibration Source Levels for Construction Equipment

Equipment	PPV (in/sec) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large Bulldozer	0.089
Vibratory Roler	0.210

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual

Table 5.8-13 shows the expected Project related vibration levels at the nearby sensitive receiver locations. Based on typical propagation rates, the vibration level at the nearest offsite structures (located at a distance ranging from 358 feet to 474 feet from the Project site) would range from 0.003 to 0.004 inch per second PPV (see Table 5.8-13), which is below the Caltrans Transportation and Construction Guidance Manual threshold of 0.3 PPV inch per second. Additionally, Project construction activities would be regulated by the City of Santa Fe Springs Municipal Code which states that operation of equipment or performance of any outside construction or repair work on buildings, structures, or projects or operation of any pile driver, power shovel, pneumatic hammer, derrick, power hoist, or any other construction type device is not allowed between the hours of 7:00 p.m. of one day and 7:00 a.m. of the next day. As such, vibration impacts would not occur during the more sensitive nighttime hours. Therefore, impacts related to construction vibration would be less than significant.

Table 5.8-13: Construction Vibration Levels at Nearest Receptors

Receptor (Location) ¹	Distance to Construction Activity (Feet) ²	Typical Construction Activity Levels PPV (in/sec)						Thresholds PPV (in/sec)	Thresholds Exceeded?
		Small bulldozer	Jack-hammer	Loaded Trucks	Large bulldozer	Vibratory Roller	Highest Vibration Level		
R1	358'	0.000	0.3	No	0.002	0.004	0.004	0.3	No
R2	437'	0.000	0.3	No	0.001	0.003	0.003	0.3	No
R2	474'	0.000	0.3	No	0.001	0.003	0.003	0.3	No

Note: 1 Construction noise receiver locations are shown in Figure 5.8-2.

2 Distance from receiver building facade to Project construction boundary (Project site boundary).

"PPV" = Peak Particle Velocity

Source: Appendix G

Operation

Less than Significant Impact. Operation of the proposed Project would include operation of heavy trucks, deliveries, moving trucks, and garbage trucks for solid waste disposal. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement conditions. However, vibration levels generated from Project-related traffic within the Project site and on the adjacent roadways are unusual for on-road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Vibration levels generated from Project-related traffic on the adjacent roadways would be less than significant.

IMPACT NOI-3: THE PROJECT WOULD NOT, FOR A PROJECT LOCATED WITHIN THE VICINITY OF A PRIVATE AIRSTRIP OR 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, EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS.

No Impact.

The proposed Project site is not located within two miles of an airport or airstrip. The nearest airport is the Long Beach Airport (LGB), located approximately 9.7 miles southwest of the Project site. Therefore, the Project site would not be exposed to excessive noise levels from airport operations and would result in no impact.

5.8.7 CUMULATIVE IMPACTS

Cumulative noise assessment considers development of the proposed Project in combination with ambient growth and other development projects within the vicinity of the Project area. As noise is a localized phenomenon, and drastically reduces in magnitude as distance from the source increases, only projects and ambient growth in the nearby area could combine with the proposed Project to result in cumulative noise impacts.

Development of the proposed Project in combination with the related projects would result in an increase in construction-related and traffic-related noise. However, City of Santa Fe Springs Municipal Code Section 155.425(B), *Special Noise Sources*, requires construction activities to not occur between the hours of 7:00 p.m. of one day and 7:00 a.m. of the next day within a residential zone or within 500 feet therefrom; therefore, noise and vibration impacts would not occur during the more sensitive nighttime hours.

As shown in Figure 5-1, *Cumulative Projects*, included in Section 5.0 of this Draft EIR, the closest cumulative project is adjacent to the Project site. The Telegraph Road and Santa Fe Springs Road Industrial Park Project site is located directly adjacent to the south and east of the Project site. The Telegraph Road and Santa Fe Springs Road Industrial Park Project is currently under pre-construction permitting process as of the writing of this Draft EIR. Construction of the proposed Project is anticipated to last approximately 18 months and is planned to begin the second quarter of 2025 and end the first quarter of 2027.

Therefore, construction activities of the adjacent and other nearby projects could overlap. However, cumulative noise increases due to construction would be temporary and localized. As discussed throughout this section, construction noise from the proposed Project at the nearby receptor locations would range from 63.4 and 64.2 dBA Leq, which is less than the existing ambient noise levels ranging between 66.9 dBA Leg to 68.5 dBA Leg in the day time and from 64.0 dBA Leg to 65.7 dBA Leg during nighttime hours. Therefore, due to the distance from nearby receptors and volume of the Project's construction noise and vibration levels, effects would not combine to become cumulatively considerable, and cumulative noise and vibration impacts associated with construction activities would be less than significant.

Cumulative mobile source noise impacts would occur primarily as a result of increased traffic on local roadways due to the proposed Project and related projects within the study area. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of the proposed Project traffic volumes on the roadways in the Project vicinity. The increase in noise levels associated with the traffic volumes of the proposed Project were previously identified. As detailed, development of the proposed Project would result in noise levels much lower than the 3 dBA threshold at sensitive receptor locations. Therefore, the Project would not result in a cumulatively considerable impact when combined with existing and future development. Cumulative impacts would be less than significant.

5.8.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Santa Fe Springs Municipal Code

- Section 155.425 (B), *Special Noise Sources*

5.8.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

The Project's impacts would be less than significant.

5.8.10 MITIGATION MEASURES

No mitigation measures are required.

5.8.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No mitigation measures are required because the Project's impacts would be less than significant.

5.8.12 REFERENCES

- Caltrans. (2020). *Transportation and Construction Vibration Guidance Manual*. <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvqm-apr2020-a11y.pdf>
- Federal Transit Administration. (2006, May) *Transit Noise and Vibration Impact Assessment*. Retrieved January 23, 2024, from https://docs.vcrma.org/images/pdf/planning/ceqa/FTA_Noise_and_Vibration_Manual.pdf
- Santa Fe Springs, City of. (2022). *Re-Imagine Santa Fe Springs 2040 General Plan*. Retrieved August 10, 2024, from https://www.santafesprings.org/departments/planning_and_development_department/planning/planning_handouts_and_maps.php#outer-136
- Urban Crossroads. (2024). *NWC Telegraph and SFS Industrial Noise and Vibration Impact Analysis*. Appendix G.

This page intentionally left blank.

5.9 Transportation

5.9.1 INTRODUCTION

This section describes the existing transportation and circulation conditions of the Project site, identifies applicable regulations, evaluates the Project's consistency with applicable goals and policies, identifies and analyzes potential environmental impacts, and recommends measures to reduce or avoid adverse impacts that could occur from implementation of the proposed Project. This analysis in the section is based, in part, on the following resources:

- *Santa Fe Springs 2040 General Plan*, adopted in 2022
- *Santa Fe Springs General Plan and Targeted Zoning Code Update Environmental Impact Report*, prepared by MIG, Inc, 2021
- Santa Fe Springs Municipal Code
- *Vehicle Miles Traveled (VMT) Analysis*, EPD Solutions, Inc., July 2024 (Appendix L)

5.9.2 REGULATORY SETTING

5.9.2.1 State Regulations

Senate Bill 743

Senate Bill 743 (SB 743) was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts. SB 743 specified that the new criteria should promote the reduction of greenhouse gas (GHG) emissions, the development of multimodal transportation networks, and a diversity of land uses. The bill also specified that delay-based LOS could no longer be considered an indicator of a significant impact on the environment. In response, Section 15064.3, *Determining the Significance of Transportation Impacts*, was added to the CEQA Guidelines beginning January 1, 2019. Section 15064.3 states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT. Section 15064.3(c) states that the provisions of the section shall apply statewide beginning on July 1, 2020.

5.9.2.2 Local and Regional Regulations

SCAG 2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) is the designated metropolitan planning organization for six Southern California counties (Ventura, Los Angeles, San Bernardino, Riverside, Orange, and Imperial). As the designated metropolitan planning organization, SCAG is mandated by the federal and State governments to prepare plans for regional transportation and air quality conformity. The most recent plan adopted by SCAG is the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal, which was adopted in April 2024. The RTP/SCS integrates transportation planning with economic development and sustainability planning and aims to comply with state GHG emissions reduction goals, such as SB 375. With respect to transportation infrastructure, SCAG anticipates in the RTP/SCS that the six-county region will have to accommodate 20,909,000 residents by 2050 while also meeting the GHG emissions reduction targets set by the California

Air Resources Board. SCAG is empowered by State law to assess regional housing needs and provide a specific allocation of housing needs for all economic segments of the community for each of the region's counties and cities. In addition, SCAG has taken on the role of planning for regional growth management.

Santa Fe Springs General Plan

The City of Santa Fe Springs General Plan Circulation Element contains the following policies related to transportation that are applicable to the proposed Project:

- Policy C-5.4 Minimize Truck Maneuvering on Streets.** Implement site design solutions or restrictions on new uses and development to minimize truck maneuvering on streets with substantial traffic during periods of high traffic volumes.
- Policy C-5.5 Minimize Roadway Damage.** Ensure that warehousing, logistics facilities, truck and container yards, and similar truck-heavy uses pay a fair share of the cost of repairing extensive damage and/or the cost of reconstructing established City roads caused by truck trips and excessive container weight.
- Policy C-5.8 Parcel Delivery.** Develop a comprehensive curb management strategy to manage loading/unloading areas for local parcel and package deliveries within areas requiring high delivery demands and to minimize local congestion and illegal parking.
- Policy C-8.1 Reducing Vehicle Miles Traveled.** Integrate transportation and land use decisions to reduce vehicle miles traveled and greenhouse gas emissions.
- Policy C-8.2 Transportation Management Strategies.** Evaluate the potential of transportation demand management strategies and intelligent transportation system applications to reduce vehicle miles traveled.
- Policy C-8.8 Employee Incentives.** Encourage businesses to provide employee incentives to utilize alternatives to conventional automobile travel (i.e., carpools, vanpools, buses, cycling, and walking).
- Policy C-8.6 Ridesharing.** Promote ridesharing through publicity and provision of information to the public through web-based apps and other approaches through collaboration with other agencies and jurisdictions.
- Policy C-9.1 Traffic Impacts Mitigation.** Require new development projects to mitigate off-site traffic impacts consistent with City policy and regulations.
- Policy C-9.2 Traffic Impact Analysis.** Require new developments to include a traffic impact analysis.

Santa Fe Springs Municipal Code Chapter 155.502

Chapter 155.502, *Trip Reduction and Travel Measures*, of the Santa Fe Springs Municipal Code discusses the related requirements aimed at reducing traffic congestion and Vehicle Miles Traveled (VMT). This section focuses on "trip reduction and travel measures," which are designed to mitigate traffic impacts from new developments. The chapter encourages the use of alternative transportation methods, such as public transit, carpooling, walking, and biking.

5.9.3 ENVIRONMENTAL SETTING

5.9.3.1 Existing Roadway Network

Interstate 605 (I-605) is a north–south auxiliary interstate highway in the state of California that connects Los Angeles County to Orange County. Regional access to the Project site is provided by I-605, which is located approximately 1.5 miles to the west.

Interstate 5 (I-5) is a north–south interstate highway in the state of California. I-5 stretches from the Mexican border at the San Ysidro crossing to the Canadian border near Blaine, Washington. Regional access to the Project site is provided by I-5, which is located approximately 1.6 miles to the east.

State Route 72 (SR-72) is a California State highway. Regional access to the Project site is provided by SR 72, which is located approximately 2.0 miles to the north.

Telegraph Road is an east-west major arterial road. The posted speed limit is 45 mph. There are no existing or planned bicycle facilities along this roadway. Telegraph Road is identified as key arterial that provides freight (truck) access with no weight restrictions.

Santa Fe Springs Road is a north-south major arterial road. The posted speed limit is 45 mph. There are existing bike lanes on both sides of Santa Fe Spring Road between Telegraph Road and Los Nietos Road. Santa Fe Springs road is identified as key arterial that provides freight (truck) access with no weight restrictions.

Norwalk Boulevard is a north-south major arterial road. The posted speed limit is 40 mph. There are no existing or planned bicycle facilities along this roadway. Norwalk Boulevard has no weight restrictions.

Hawkins Street is an east-west local street. The posted speed limit is 30 mph. There are no existing or planned bicycle facilities along this roadway. Hawkins Street has no weight restrictions.

Traffic counts at the existing study area intersections determined that the Santa Fe Springs Road/Project Driveway 1 (existing driveway east of the Project site, along Santa Fe Springs Road) intersection operates at a deficient Level of Service of F in the existing year (2024).

5.9.3.2 Existing Truck Routes Services

In Santa Fe Springs, arterial roadways have been designed to accommodate freight movement (Santa Fe Springs, 2022). Telegraph Road, Santa Fe Springs Road, and Norwalk Boulevard are major arterial roads.

Figure C-9 of the General Plan (Figure 5.9-1, *Santa Fe Springs Freight System*, of this document) identifies gross weight restrictions of the city's roadway system. Telegraph Road, Santa Fe Springs Road, Norwalk Boulevard, and Hawkins Street have no weight restrictions, and thus may be utilized by truck traffic.

5.9.3.3 Existing Site Access

Regional access to the Project site is provided by I-5, I-605, and SR-72. Local access to the Project site is provided via Telegraph Road and Santa Fe Springs Road. The Project site is northwest of the Telegraph Road and Santa Fe Springs Road intersection.

5.9.3.4 Existing Transit Services

Public transportation services within the City are provided by Metrolink, Foothill transit, Montebello Bus Lines, and Norwalk Transit System (Santa Fe Springs, 2022). The Norwalk/Santa Fe Springs Metrolink station is located approximately 1.75 miles south of the Project site at 12650 Imperial Highway, Norwalk. The station has 630 commuter parking spaces and long- and short-term bicycle parking available for Metrolink riders. Bus transit within the City generally runs every 30 to 45 minutes. The nearest bus stops to the Project site are: Metrolink, located on the corner of Telegraph Road and Norwalk Boulevard, approximately 1,570 linear feet from the Project site; Metrolink, located on the corner of Telegraph Road and Santa Fe Springs Road, approximately 290 linear feet from the Project site; and Norwalk Transit System, also located on the corner of Telegraph Road and Santa Fe Springs Road, approximately 290 feet from the Project site.

5.9.3.5 Existing Bicycle and Pedestrian Facilities

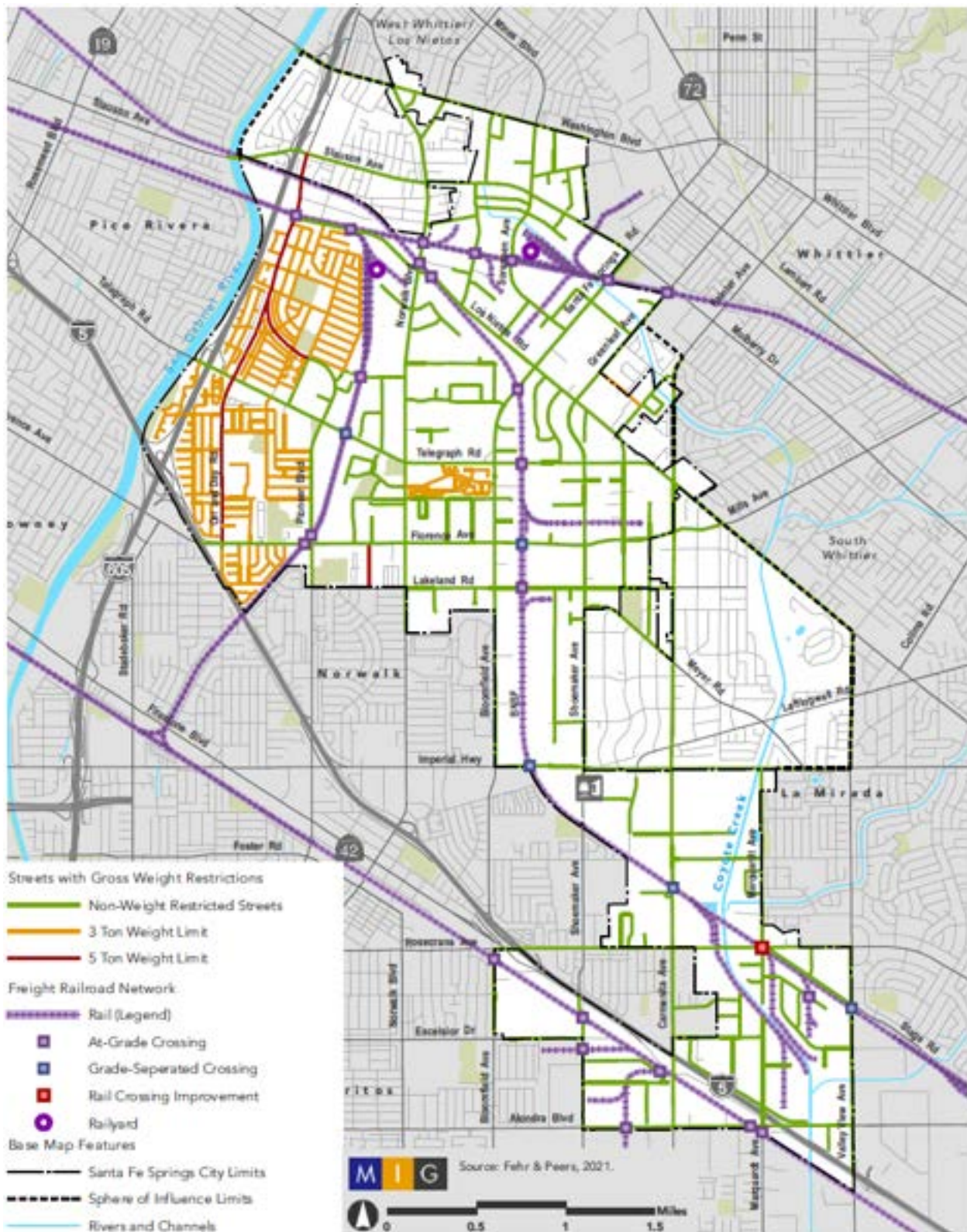
There are existing Class III bike lanes on both sides of Santa Fe Spring Road between Telegraph Road and Los Nietos Road. As shown in Figure C-5 of the General Plan, within the Project vicinity, the City of Santa Fe Springs General Plan Circulation Element identifies Santa Fe Springs Road, located east of the Project site, as a proposed buffered bike lane (Class IIB). In addition, Los Nietos Road, located approximately 1,995 linear feet north of the Project site, is identified as a proposed buffered bike lane (Class IIB); Clark Street, located approximately 1,285 linear feet south of the Project site (south of the residential area), is identified as a proposed bicycle route (Class III); and Geary Avenue, located approximately 2,255 linear feet west of the Project site, is identified as a proposed bicycle lane (Class II) (City of Santa Fe Springs, 2022).

There are existing sidewalks on both sides of Telegraph Road between Bloomfield Avenue and Norwalk Boulevard. There are existing sidewalks on both sides of Santa Fe Springs Road between Telegraph Road and Los Nietos Road.

5.9.3.6 Existing Vehicle Miles Traveled

Vehicle miles traveled (VMT) is defined as one vehicle traveling on a road for one mile. The Project site is located within a SCAG Tier 1 Traffic Analysis Zone (TAZ) (TAZ 21832000). The TAZ is identified as being “Higher than City Baseline” for home-based work (HBW) trip VMT per employee per the *City of Santa Fe Springs Transportation Study Guidelines* (Santa Fe Springs, 2023).

Santa Fe Springs Freight System



This page intentionally left blank.

5.9.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- TRA-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- TRA-2 Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).
- TRA-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- TRA-4 Result in inadequate emergency access.

5.9.5 METHODOLOGY

To determine whether the potential future buildout of the Project would result in a significant impact related to conflict with a program, plan, ordinance, or policy related to the effectiveness of the circulation system, the extent to which the proposed Project would provide facilities to enhance the use of public transit, pedestrian, and bicycle mobility, the proposed Project was compared to adopted plans for public transit, pedestrian mobility, and bicycle facilities. A significant impact would result if the proposed Project resulted in a conflict that could result in an impact on the environment.

Vehicle Miles Traveled Analysis Methodology

As outlined in CEQA Guidelines Section 15064.3, except as provided for roadway capacity transportation projects, a project's effect on automobile delay shall not constitute a significant environmental impact. Therefore, this analysis has been prepared in accordance with CEQA requirements to evaluate potential transportation impacts based on VMT. The *City of Santa Fe Springs Transportation Study Guidelines* (City Guidelines) provides criteria for Projects that would be considered to have a less-than significant impact on VMT and therefore could be screened out from further analysis; and those that would have the potential to result in a VMT impact and therefore, require a VMT analysis based on VMT reduction thresholds (City of Santa Fe Springs, 2023). Consistent with the City Guidelines, the VMT screening thresholds were used to identify if the Project could have an impact on VMT, as detailed below.

When a project fails to meet any of the aforementioned screening criteria, a more comprehensive VMT analysis is warranted. A VMT analysis was conducted in accordance with the City Guidelines. Per the City's criteria, the Project VMT analysis (included in Appendix L) used the SCAG Model. The Project is located within TAZ 21832000, a SCAG Tier 1 TAZ. The potential HBW trips generated by the Project were calculated using a rate of industrial employment. The land use category "Transportation and warehousing (urban)," which would yield 1 employee per 1,200 SF, was used for the warehouse portion of the Project, while the land use category "Manufacturing (urban)," which would yield 1 employee per 575 SF, was used for the manufacturing portion of the Project. SCAG Model Version 6.3 was used for this VMT analysis. The Model includes validated scenarios for 2012 and 2040, that have been validated using existing traffic counts. Per the City Guidelines, the model output for HBW VMT is assessed HBW and is compared to the City target VMT per employee to determine if a potential impact would occur.

5.9.6 ENVIRONMENTAL IMPACTS

IMPACT TRA-1: THE PROJECT WOULD NOT CONFLICT WITH A PROGRAM, PLAN, ORDINANCE, OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE, AND PEDESTRIAN FACILITIES.

Less than Significant.

Transit, Bicycle, and Pedestrian Facilities

Transit. The Project vicinity is served by Metrolink, Foothill Transit, Montebello Bus Lines, and Norwalk Transit System. The nearest bus stops to the Project site include: Metrolink, located on the corner of Telegraph Road and Norwalk Boulevard, approximately 1,570 linear feet from the Project site, as well as on the corner of Telegraph Road and Santa Fe Springs Road, approximately 290 linear feet from the Project site; and the Norwalk Transit System, also located on the corner of Telegraph Road and Santa Fe Springs Road, approximately 290 feet from the Project site. These existing transit services would continue to serve ridership in the area and may also serve employees of the Project. Accordingly, the proposed Project would not alter or conflict with existing transit stops and schedules, and impacts related to transit services would not occur.

Bicycle Facilities. As previously stated, there are existing Class III bike lanes on both sides of Santa Fe Springs Road between Telegraph Road and Los Nietos Road. As shown in Figure C-5 of the General Plan, within the Project vicinity, the City of Santa Fe Springs General Plan Circulation Element identifies Santa Fe Springs Road, located east of the Project site, as a proposed buffered bike lane (Class IIB) (City of Santa Fe Springs, 2022). In addition, Los Nietos Road, located approximately 1,995 linear feet north of the Project site, is identified as a proposed buffered bike lane (Class IIB); Clark Street, located approximately 1,285 linear feet south of the Project site (south of the residential area), is identified as a proposed Bicycle Route (Class III); and Geary Avenue, located approximately 2,255 linear feet west of the Project site, is identified as a proposed Bicycle Lane (Class II). The Project does not propose offsite roadway improvements. As such, the proposed Project would not encroach upon public right of way and would not prevent the development of these proposed bicycle facilities. The proposed Project would include 19 bicycle stalls for Building 1 and 15 bicycle stalls for Building 2, for a total of 34 bicycle stalls for the Project. Furthermore, the existing bike lanes on Santa Fe Springs Road would remain and may potentially be used by employees of the Project site. As a result, the Project would not result in any conflicts with existing or proposed bicycle facilities. Thus, impacts related to bicycle facilities would not occur.

Pedestrian Facilities. There are existing sidewalks adjacent to the Project site on Telegraph Road to the south, Santa Fe Springs Road to the east, and on Hawkins Street to the west. Hawkins Street is a local street that extends east to west from just west of the Project site to Norwalk Boulevard. As detailed in Section 3.0, *Project Description*, the proposed Project would include the construction of an onsite cul-de-sac driveway that would include an approximately 11-foot sidewalk. The proposed sidewalk would connect to the existing sidewalk on Hawkins Street, east of the Project site, on both sides of the street. The proposed sidewalk connection would be developed in accordance with the City of Santa Fe Springs General Plan and the City of Santa Fe Springs Municipal Code standards and guidelines. As a result, the Project would enhance existing pedestrian facilities, and impacts related to pedestrian facilities would not occur.

Truck Route Facilities. The City of Santa Fe Springs General Plan identifies Telegraph Road, located south of the Project site, and Santa Fe Springs Road, located east of the Project site, as key arterial roads that provide freight access to and from I-5, I-605, SR-72 (Whittier Boulevard), and SR-19 (Rosemead Boulevard). As discussed in Section 3.0, *Project Description*, the Project site would be accessed by trucks from a proposed cul-de-sac driveway along Hawkins Street. As shown in Figure 5.9-1, *Santa Fe Springs Freight System*, of the Santa Fe Springs General Plan, Telegraph Road, Santa Fe Springs Road, Norwalk Boulevard, and Hawkins Street have no weight restrictions, meaning that they may be utilized by trucks. Truck movement to and from

the Project site would directly access the Santa Fe Springs General Plan designated freight system roads identified in Figure 5.9-1 utilizing I-605 to Telegraph Road and continuing east to Norwalk Boulevard, then north to Hawkins Street, and east to the Project site, as shown in Figure 3-11, *Circulation and Driveways*, in Section 3.0, *Project Description*. Therefore, the proposed Project is consistent with the freight system identified in the City of Santa Fe Springs General Plan Circulation Elements, and impacts related to truck route facilities would not occur.

Roadway Facilities

Operation. Regional access to the Project site is provided by I-5, I-605, and SR-72; local access to the Project site is provided via Telegraph Road and Santa Fe Springs Road, as described in Section 3.0, *Project Description*. Vehicular traffic to and from the Project site would continue to utilize the existing network of regional and local roadways that currently serve the Project vicinity. Access to the Project site would be provided from two existing driveways on Telegraph Road and Santa Fe Springs Road, and from one proposed cul-de-sac driveway on Hawkins Street. All three driveways would allow for both automobile and truck access. The Project does not propose new roadways or offsite roadway improvements.

Table 5.9-1, *Proposed Project Trip Generation*, identifies the number of trips that would be generated by the Project. In order to provide a conservative analysis, trip rates from the Institute of Transportation Engineers for High-Cube Cold Storage Warehouses (Land Use Code 157) and Manufacturing (Land Use Code 140) were used to evaluate the proposed land use. As shown, the Project would generate a total of 1,394 daily trips, inclusive of 130 AM (99 inbound and 31 outbound), and 138 PM (40 inbound and 98 outbound) peak hour trips. When converted to passenger car equivalent (PCE) trips, the proposed Project is estimated to generate approximately 1,972 daily PCE trips, inclusive of 166 PCE AM trips (128 inbound and 38 outbound) and 174 PCE PM trips (51 inbound and 123 outbound) (Appendix L).

Construction. Construction of the proposed Project is anticipated to occur over an 18-month period. Construction-related trips generated on a daily basis throughout various construction activities would be derived from construction workers and delivery of materials and would vary depending on the phase of construction. It is anticipated that Project construction would generate haul trips that would be distributed throughout the day. During construction, there would also be passenger car construction trips associated with crew arrivals and departures. The weekday AM peak period is 7:00 AM to 9:00 AM, and the weekday PM peak period is 4:00 PM to 6:00 PM. It is anticipated the majority of construction crews would arrive and depart outside the peak hours, while delivery trucks would arrive and depart throughout the day. As detailed in Section, 3.0, *Project Description*, Project grading is anticipated to result in an export of 25,000 cubic yards (CY) of soil due to soil contamination and in an import 126,929 CY of soil.

As shown in Table 5.9-2, *Daily Construction Vehicle Trips*, the building construction phase of the construction process would generate the most vehicular trips per day from approximately 246 workers and 96 vendors per day, resulting in a total of 342 daily trips during building construction phase that would last approximately 220 working days (per Table 3-2). This is substantially less than that which would be generated from operation of the Project.

All construction equipment, including construction worker vehicles, would be staged on the Project site for the duration of the construction period. In addition, as part of the grading and building plan review processes, the City construction permits would require appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures (as applicable). Therefore, construction impacts related to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system would be less than significant.

Table 5.9-1: Proposed Project Trip Generation

Land Use	Units	Daily	AM Peak Hour			PM Peak Hour			
			In	Out	Total	In	Out	Total	
<u>Trip Rates</u>									
High-Cube Cold Storage Warehouses ¹	TSF	2.12	0.13	0.04	0.11	0.05	0.13	0.12	
Manufacturing ²	TSF	4.75	0.52	0.16	0.68	0.23	0.51	0.74	
<u>Project Trip Generation*</u>									
Two (2) Buildings Total Area	584,678	TSF							
High-Cube Cold Storage Warehouses (%10 Cold Storage) ¹	526,21	TSF	1,116	69	21	90	27	68	95
<u>ITE Vehicle Mix³</u>									
Passenger (64.6% Daily, 72.7% AM, 75% PM)			725	50	15	65	20	51	71
Truck (35.4% Daily, 27.3% AM, 25% PM)			390	19	6	25	7	17	24
			1,116	69	21	90	27	68	95
<u>Truck Vehicle Mix⁴</u>			<u>Percent</u>						
2-Axle truck		34.70%	135	7	2	9	3	6	9
3-Axle truck		11.00%	43	2	1	3	1	2	3
4+-Axle Trucks		54.40%	212	10	3	13	4	9	13
		100%	390	19	6	25	7	17	24
<u>PCE Trip Generation⁵</u>			<u>PCE Factor</u>						
Passenger Vehicles		1.0	725	50	15	65	20	51	71
2-Axle truck		1.5	203	10	3	13	5	9	13
3-Axle truck		2.0	86	4	1	5	1	4	5
4+-Axle Trucks		3.0	637	30	9	39	11	27	38
Total PCE Trip Generation			1,651	94	28	122	37	91	128
Manufacturing ²	58,47	TSF	278	30	10	40	13	30	43
<u>ITE Vehicle Mix⁶</u>									
Passenger (90.5% Daily, 95.6% AM, 95.9% PM)			250	28	10	38	12	29	41
Truck (9.5% Daily, 4.4% AM, 4.1% PM)			28	2	0	2	1	1	2
			278	30	10	40	13	30	43
<u>Truck Vehicle Mix⁷</u>			<u>Percent</u>						
2-Axle Trucks		16.70%	5	0	0	0	1	0	1
3-Axle Trucks		20.70%	6	0	0	0	0	0	0
4+-Axle Trucks		62.50%	17	2	0	2	0	1	1
		100%	28	2	0	2	1	1	2
<u>PCE Trip Generation⁵</u>			<u>PCE Factor</u>						
Passenger Vehicles		1.0	250	28	10	38	12	29	41
2-Axle Trucks		1.5	8	0	0	0	2	0	2
3-Axle Trucks		2.0	12	0	0	0	0	0	0
4+-Axle Trucks		3.0	51	6	0	6	0	3	3
Total PCE Trip Generation			321	34	10	44	14	32	46
Total Passenger Trip Generation			975	78	25	103	32	80	112
Total Truck Trip Generation			418	21	6	27	8	18	26
Total Truck (PCE) Trip Generation			997	50	13	63	19	43	62
Total Trip Generation			1,394	99	31	130	40	98	138
Total PCE Trip Generation			1,972	128	38	166	51	123	174

TSF = Thousand Square Feet

PCE = Passenger Car Equivalent

¹ Trip rates from the Institute of Transportation Engineers, Trip Generation Manual, 11th Edition, 2021. Land Use Code 157 High-Cube Cold Storage Warehouse.² Trip rates from the Institute of Transportation Engineers, Trip Generation Manual, 11th Edition, 2021. Land Use Code 140 Manufacturing.³ ITE Vehicle Mix for Warehousing for Land Use Code 157 - High Cube Transload and Short-Term.⁴ Vehicle Mix from SCAQMD Warehouse Truck Trip Study Data Results and Usage. Classification: With Cold Storage⁵ Passenger Car Equivalent (PCE) factors from County of Riverside Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled.⁶ Vehicle Mix from the Manufacturing ITE rate and the Warehouse Truck Trip Study Data Results and Usage. Classification: Without Cold Storage⁷ Vehicle Mix from SCAQMD Warehouse Truck Trip Study Data Results and Usage. Classification: Without Cold Storage

*The proposed Project includes 10% Cold Storage and 10% Manufacturing.

Table 5.9-2: Daily Construction Vehicle Trips

Construction Activity	Worker Trips Per Day	Vendor Trips Per Day	Haul Trips
Demolition	18	0	50
Site Preparation	18	0	0
Grading	25	0	159
Building Construction	246	96	0
Paving	15	0	0
Architectural Coating	49	0	0

Source: Air Quality Impact Analysis (CalEEMod) (Appendix B)

Santa Fe Springs Active Transportation Plan

In 2020, Santa Fe Springs completed the 2020 Active Transportation Plan, which represents a new commitment to promoting walking and biking. The goal of the plan was to help the community move toward a more sustainable, multi-modal transportation system that serves all residents regardless of age, ability, identity, or income (City of Santa Fe Springs, 2022). The Active Transportation Plan is incorporated into the city's General Plan Circulation Element discussed above. Therefore, because the Project is consistent with the city's General Plan as discussed above, the proposed Project is also consistent with the Santa Fe Springs Active Transportation Element.

IMPACT TRA-2: THE PROJECT WOULD CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES § 15064.3, SUBDIVISION (B).

Significant and Unavoidable.

As described previously, State CEQA Guidelines Section 15064.3(b) focuses on determining the significance of VMT-related transportation impacts. The *City of Santa Fe Springs VMT Screening Criteria* contains the following screening thresholds to assess whether a project has the potential to result in an impact and further VMT analysis is required. If the Project meets any of the following screening thresholds, then the VMT impact of the Project is considered less than significant and further VMT analysis is not required.

1. Project Size Screening
2. Locally Serving Retail Screening
3. Project Located in a Low VMT Area Screening
4. Affordable Housing Projects Screening
5. Transportation Facilities Screening

The applicability of each screening criteria in comparison to the proposed Project is discussed below.

Project Size Screening: Projects that generate fewer than 110 daily net new vehicle trips are presumed to have a less-than-significant impact, per the City's guidelines. As shown in Table 5.9-1, the proposed Project would generate 975 daily passenger vehicle trips. As such, the proposed Project would not satisfy the requirements of Screening Criteria 1.

Locally Serving Retail Screening: Projects that propose locally serving retail uses that are 50,000 square feet or less are presumed to have a less-than-significant impact. The Project does not propose a local serving retail use. As such, the project would not satisfy the requirements of Screening Criteria 2.

Project Located in a Low VMT Area Screening: Residential or office (Commercial or Light Industrial) projects located in a low VMT generating area may be presumed to have a less-than-significant impact. As shown in Figure 4 of the City Guidelines, the Project site is not located in a low VMT area. Therefore, the Project would not satisfy the requirements of Screening Criteria 3.

Affordable Housing Projects Screening: Projects that provide affordable housing units are presumed to have a less-than-significant impact. The proposed Project does not provide affordable housing units. As such, the proposed Project would not satisfy the requirements of Screening Criteria 5.

Transportation Facilities Screening: Transportation projects that promote non-auto travel, improve safety, or improve traffic operations at current bottlenecks, such as transit, bicycle and pedestrian facilities, intersection traffic control (e.g., traffic signals or roundabouts), or widening at intersections to provide new turn lanes are presumed to have a less-than-significant impact. The proposed Project is not a transportation project. As such, the proposed Project would not satisfy the requirements of Screening Criteria 6.

Since the Project does not meet the screening criteria, a more comprehensive VMT analysis was prepared, which determined that the proposed Project would have a significant impact on HBW VMT per employee when compared to the baseline conditions. As shown in Table 5.9-3, *Project VMT Analysis*, the projected HBW VMT per employee for the Project would be 26.5 in 2024, which is 44.9 percent above the threshold of 18.3 VMT per employee. Therefore, the Project would result in a significant VMT impact.

Table 5.9-3: Project VMT Analysis

Scenario	Project Home-Based Work VMT/Employee	Threshold ¹	Percent Above the Threshold	Impact?
Model Base Year (2012)	26.4	18.3 VMT/Employee	44.2%	Yes
Baseline (2024)	26.5		44.9%	Yes
Model Cumulative Year (2040)	26.7		45.9%	Yes

Note: ¹City of Santa Fe Springs Transportation Study Guidelines

Source: VMT Analysis (Appendix L)

The City Guidelines state that individual project mitigation measures are recommended to reduce the project specific VMT impacts by implementing transportation demand management (TDM) strategies. The strategies are based on the 2021 California Air Pollution Control Officers Association (CAPCOA) guidelines. The 2021 CAPCOA guidelines identify a total of 34 transportation-related GHG emission reduction measures with 32 measures that reduce VMT as a quantified co-benefit. A majority of the measures, based on their description and their measure scale, are not applicable to the proposed uses (warehouse with 10 percent light manufacturing). Six of the 34 VMT reduction measures were determined to be applicable to the proposed Project, as described in Section 5.9.11, *Mitigation Measures*, below.

Mitigation Measure TRA-1 incorporates CAPCOA Measures T-5 through T-11. Mitigation Measure T-1 requires mandatory implementation of a commute trip reduction program that includes monitoring (CAPCOA Measure T-6). The commute trip reduction program would include all other elements described for the voluntary program (CAPCOA Measure T-5) including: implementation of a commute trip reduction marketing (CAPCOA Measure T-7), providing a rideshare program (CAPCOA Measure T-8), implementation of a subsidized or discounted transit program (CAPCOA Measure T-8), providing end-of-trip bicycle facilities (CAPCOA Measure T-10), and providing employer-sponsored vanpool(s) (CAPCOA Measure T-7).

With compliance with existing rules and implementation of CAPCOA measures T-5 through T-11 that are included as Mitigation Measure T-1, the HBW VMT per employee of the Project would be reduced by 23.8 percent, as shown in Table 5.9-4, *Mitigated Project VMT Analysis*. Despite this reduction, the Project VMT would continue to exceed the baseline threshold by 21.1 percent. Therefore, the Project VMT impacts would be significant and unavoidable.

Table 5.9-4: Mitigated Project VMT Analysis

	Baseline (2024)
Percent Above or Below Threshold	44.9%
Impact?	Yes
CAPCOA Mitigation Measures (Included as Mitigation Measure T-1 for this Project)	VMT Reduction
T-6: Implement Commute Trip Reduction Program (Mandatory Implementation and Monitoring)	-23.8%
T-7: Implement Commute Trip Reduction Marketing	Part of T-6
T-8: Provide Rideshare Program	Part of T-6
T-9: Implement Subsidized or Discounted Transit Program	Part of T-6
T-10: Provide End-of-Trip Bicycle Facilities	Part of T-6
T-11 Provide Employer-Sponsored Vanpool	Part of T-6
Percent Above or Below Threshold with Mitigation	21.1%
Impact with Mitigation?	Yes

Source: VMT Analysis (Appendix L)

IMPACT TRA-3: THE PROJECT WOULD NOT SUBSTANTIALLY INCREASE HAZARDS DUE TO A GEOMETRIC DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT).

Less than Significant Impact.

Construction

The Project proposes development of the site in one phase lasting approximately 18 months. During construction, worker vehicles, haul trucks, and vendor trucks would be staged on the portion of the Project site under construction for the duration of the construction period. As part of the grading plan and building plan review processes, City permits would require appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures and measures to properly route heavy-duty construction vehicles entering and leaving the site (as applicable). As a result, impacts related to vehicular circulation design features and incompatible uses during construction of the proposed Project would be less than significant.

Operation

As previously stated, access to the Project site would be provided via three driveways, including two existing driveways on Telegraph Road and on Santa Fe Springs Road, and one proposed cul-de-sac driveway on Hawkins Street. The proposed cul-de-sac driveway would include construction of an approximately 11-foot sidewalk. The proposed sidewalk would connect to the existing sidewalk on Hawkins Street, east of the Project site, on both sides of the street.

Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that currently serve the Project area. Trucks would utilize existing City-designated freight system roads to and from I-605, which would limit potential safety conflicts between passenger vehicles and trucks. As previously stated, trucks traveling to the Project site would travel via I-605 to Telegraph Road and continue east to Norwalk Boulevard, then north to Hawkins Street, and east to the Project site.

Onsite traffic signing and stripping would also be implemented in conjunction with detailed construction plans with implementation of the Project. Additionally, sight distance at the Project's access points would be reviewed with respect to City standards at the time of final grading, landscape, and street improvement plan reviews. Project frontage improvements and site access points would be constructed to be consistent with the identified roadway classifications and respective cross-sections in accordance with the City of Santa Fe Springs Circulation Element and the City's engineering requirements. Compliance with existing regulations would be ensured through the City's construction permitting process. As a result, impacts related to vehicular circulation design features would be less than significant.

IMPACT TRA-4: THE PROJECT WOULD NOT RESULT IN INADEQUATE EMERGENCY ACCESS.

Less than Significant Impact. The proposed Project would not result in inadequate emergency access. Direct access to the proposed Project would be from three driveways, including two existing driveways on Telegraph Road and on Santa Fe Springs Road, and one proposed cul-de-sac driveway on Hawkins Street. Construction activities would occur within the proposed Project site and would not restrict access of emergency vehicles to the site or adjacent areas. The proposed Project is required to design and construct internal access, and size and location of fire suppression facilities (e.g., hydrants and sprinklers) to conform to the 2022 (most recent) California Fire Code standards. The Fire Department would review the development plans prior to approval to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). As such, the proposed Project would not result in inadequate access, and impacts would be less than significant.

5.9.7 CUMULATIVE IMPACTS

Conflict with Circulation Plan or Program

The cumulative traffic study area for the proposed Project includes the City of Santa Fe Springs and is based on projections of land use and development from the General Plan, as the proposed Project is consistent with the General Plan land use designation, zoning designation, and allowable buildout. The evaluation of Impact TRA-1 concluded that the proposed Project would not result in significant impacts related to transportation or policies addressing the circulation system. The proposed Project was determined to not impact transit and roadway facilities. The freight system roads usage and roadway operations of the Project were determined to not conflict with the City's circulation system. Cumulative development in the City would be subject to site-specific reviews, including reviews of sidewalk, bike lane, and bus stop designs that would reduce the potential for cumulatively considerable impacts. As the Project would result in a less-than-significant impact and cumulative projects require compliance with existing circulation regulations, potential impacts from the Project would not cumulatively combine with other projects to result in cumulatively considerable impacts. Thus, cumulative impacts related to conflict with circulation plans and programs would be less than significant.

Vehicle Miles Traveled

The cumulative traffic study area for the proposed Project includes the City of Santa Fe Springs, and the information utilized in the analysis of VMT are the City's land use data and the projections contained within the SCAG Model. The results of the VMT Analysis are shown in Tables 5.9-3, *Project VMT Analysis*, and Table 4.9-7, *Mitigated Project VMT Analysis*, above. The Project would have a significant impact on HBW VMT per employee when compared to the baseline conditions. The projected HBW VMT per employee for the Project would be 26.5 in 2024 and 26.7 in 2045. This is 44.9 percent above the baseline threshold and 45.9 percent above the cumulative threshold. Although the Project would be required to implement feasible mitigation, the VMT would remain 21 percent above thresholds. Therefore, the Project would result in a significant and unavoidable project level and cumulative impact related to VMT.

Design and Roadway Hazards

The cumulative traffic study area for the proposed Project includes the City of Santa Fe Springs and is based on projections of land use and development from the General Plan, as the proposed Project is consistent with the General Plan land use designation, zoning designation, and allowable buildout. The evaluation of Impact TRA-3 concluded that the proposed Project would not result in significant impacts related to incompatible uses or hazards due to roadway design. The proposed circulation layout would be required to be installed in conformance with City design standards to ensure that no potentially hazardous design features or inadequate emergency access would be introduced by the Project that could combine with potential hazards from other projects. In addition, cumulative development in the City and surrounding jurisdictions would be subject to site-specific reviews, including reviews by police and fire protection authorities, and the City of Santa Fe Springs' own traffic safety engineers, that would reduce the potential of cumulatively considerable design hazards. Therefore, potential impacts related to circulation design features would not occur from the Project and would not combine with hazards from other projects. Thus, cumulative impacts would be less than significant.

5.9.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- SB 743
- SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

Plans, Programs, or Policies

None.

5.9.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impacts TRA-1, TRA-3, and TRA-4 would be less than significant.

Upon implementation of regulatory requirements and prior to feasible mitigation measures, Impact TRA-2 would be significant.

5.9.10 MITIGATION MEASURES

Mitigation Measure TRA-1 (CAPCOA Measures T-5 through T-11): Commute Trip Reduction Program.

The City's operational and occupancy permitting shall include that the tenant shall be required (by contract specifications) to implement a Commute Trip Reduction (CTR) Program to encourage employees to carpool, take transit, and bike to work. 100% of employees shall be eligible to participate in all identified measures of the CTR Program. The mandatory CTR Program shall include all other elements (i.e., CAPCOA Measures T-7 through T-11) described for the voluntary program (Measure T-5) plus include mandatory trip reduction requirements (including penalties for non-compliance) and regular monitoring and reporting to ensure the calculated VMT reduction matches the observed VMT reduction. The specific components of the CTR Program are described below:

1. Implement Commute Trip Reduction Marketing (CAPCOA Measure T-7). The CTR marketing strategy shall include information sharing and marketing to promote and educate employees about their travel choices to the employment location. This measure shall require an on-site employee to assume the responsibilities

of the transportation coordinator role, help provide commuter information services and facilitate on-site or online transit pass sales.

2. Provide Ridesharing Program (CAPCOA Measure T-8). The CTR Program shall include tenant-provided incentives for carpooling or vanpooling such as priority parking spaces and/or a daily or monthly stipend for participants. Additional incentives for carpool and/or vanpool drivers could also be provided.
3. Implement Subsidized or Discounted Transit Program (CAPCOA Measure T-9). The CTR Program shall include subsidized or discounted, or free transit passes for employees and/or residents.
4. Provide End-of-Trip Bicycle Facilities (CAPCOA Measure T-10). The CTR Program shall include installation and maintenance of end-of-trip facilities for employee use that facilitate bicycling to work. Facilities could include bike locks and bike racks.
5. Provide Employer-Sponsored Vanpool (CAPCOA Measure T-11). The CTR Program shall include implementation of an employer-sponsored vanpool service. Vanpooling is a flexible form of public transportation that provides groups of 5 to 15 people with a cost-effective and convenient rideshare option for commuting.
6. The CTR Program shall include mandatory trip reduction requirements (including penalties for non-compliance) and regular monitoring and reporting to ensure the calculated VMT reduction matches the observed VMT reduction (CAPCOA Measure T-6).

5.9.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Upon implementation of existing regulatory requirements and feasible mitigation measures, impacts related to VMT (Impact TRA-2) would be significant and unavoidable.

5.9.12 REFERENCES

California Air Pollution Control Officers Association (CAPCOA). (2021, December). *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*.

Santa Fe Springs, City of. (2023). *City of Santa Fe Springs Transportation Study Guidelines*.
<https://cms5.revize.com/revize/santafespringsca/departments/planning/TSG.pdf>

Santa Fe Springs, City of. (2022). *Re-Imagine Santa Fe Springs 2040 General Plan*. Retrieved August 10, 2024, from
https://www.santafesprings.org/departments/planning_and_development_department/planning/planning_handouts_and_maps.php#outer-136

EPD Solutions, Inc. (2024b). *Vehicle Miles Traveled (VMT) Analysis*. (**Appendix L**).

5.10 Tribal Cultural Resources

5.10.1 INTRODUCTION

This section addresses potential impacts to tribal cultural resources (TCRs) associated with implementation of the proposed Project. The analysis in this section is based, in part, on the following documents and resources:

- *Santa Fe Springs General Plan 2040*, adopted in 2022
- *Santa Fe Springs General Plan and Targeted Zoning Code Update Environmental Impact Report*, prepared by MIG, Inc, 2021
- *Cultural Resources Study Update for the NW Telegraph & Santa Fe Springs Project*, prepared by BFS Environmental Services, 2024 (Appendix D)
- *Preliminary Geotechnical Evaluation*, APN 8005-0150-051, 12400 Hawkins Street, Santa Fe Springs, CA, LGC Geotechnical, 2024 (Appendix E)

Additionally, part of this analysis is based upon Project-specific coordination and consultation with California Native American tribes that are traditionally and culturally affiliated with the Project region. In accordance with Public Resources Code Section 15120(d), certain information and communications that disclose the location of archaeological sites and sacred lands are allowed to be exempt from public disclosure.

5.10.2 REGULATORY SETTING

5.10.2.1 Federal Regulations

Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) of 1979 regulates the protection of archaeological resources and sites on federal and Native American lands. The ARPA regulates authorized archaeological investigations on federal lands; increased penalties for looting and vandalism of archaeological resources; and required that the locations and natures of archaeological resources be kept confidential in most cases. In 1988, amendments to the ARPA included a requirement for public awareness programs regarding archaeological resources.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) is a federal law passed in 1990 that mandates museums and federal agencies to return certain Native American cultural items—such as human remains, funerary objects, sacred objects, or objects of cultural patrimony—to lineal descendants or culturally affiliated Native American tribes.

5.10.2.2 State Regulations

California Public Resources Code

Archaeological resources are protected pursuant to a wide variety of state policies and regulations enumerated under the California Public Resources Code (PRC). In addition, cultural resources are recognized as nonrenewable resources and therefore receive protection under the PRC and the California Environmental Quality Act (CEQA).

PRC Sections 5097.9 to 5097.991 provide protection to Native American historical and cultural resources and sacred sites and identify the powers and duties of the Native American Heritage Commission (NAHC). These sections also require notification to descendants of discoveries of Native American human remains and provide for treatment and disposition of human remains and associated grave goods.

California Assembly Bill 52

Assembly Bill 52 (AB 52) established a requirement under CEQA to consider “tribal cultural values, as well as scientific and archaeological values when determining impacts and mitigation.” Public Resources Code (PRC) Section 21074(a) defines “tribal cultural resources” (TCRs) as “[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” that are either “[i]ncluded or determined to be eligible for inclusion in the California Register of Historical Resources” or “in a local register of historical resources.” Additionally, defined cultural landscapes, historical resources, and archaeological resources may be considered TCRs. PRC Section 21074(b), (c). The lead agency may also in its discretion treat a resource as a TCR if it is supported with substantial evidence.

Projects for which a notice of preparation for a Draft EIR was filed on or after July 1, 2015, are required to have lead agencies offer California Native American tribes traditionally and culturally affiliated with the project area consultation on CEQA documents prior to submitting an EIR in order to protect TCRs. PRC Section 21080.3.1(b) defines “consultation” as “the meaningful and timely process of seeking, discussing, and considering carefully the views of others, in a manner that is cognizant of all parties’ cultural values and, where feasible, seeking agreement.” Consultation must “be conducted in a way that is mutually respectful of each party’s sovereignty [and] recognize the tribes’ potential needs for confidentiality with respect to places that have traditional tribal cultural significance.” The consultation process is outlined as follows:

1. California Native American tribes traditionally and culturally affiliated with the project area submit written requests to participate in consultations.
2. Lead agencies are required to provide formal notice to the California Native American tribes that requested to participate within 14 days of the lead agency’s determination that an application package is complete or decision to undertake a project.
3. California Native American tribes have 30 days from receipt of notification to request consultation on a project.
4. Lead agencies initiate consultations within 30 days of receiving a California Native American tribe’s request for consultation on a project.
5. Consultations are complete when the lead agencies and California Native tribes participating have agreed on measures to mitigate or avoid a significant impact on a TCR, or after a reasonable effort in good faith has been made and a party concludes that a mutual agreement cannot be reached (PRC Sections 21082.3(a), (b)(1)-(2); 21080.3.1(b)(1)).

AB 52 requires that the CEQA document disclose significant impacts on TCRs and discuss feasible alternatives or mitigation to avoid or lessen an impact.

California Health and Safety Code, Section 7050.5

This code requires that if human remains are discovered on a project site, disturbance of the site must halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of a Native American, he or she shall contact the NAHC by telephone within 24 hours.

5.10.2.3 Local and Regional Regulations

City of Santa Fe Springs General Plan

The City of Santa Fe Springs General Plan contains the following policies related to TCRs that are applicable to the Project (City of Santa Fe Springs, 2021a):

Open Space and Conservation Element

- Goal COS-11** **City's historical and cultural assets are protected, preserved, and celebrated.**
- Policy COS 11.1** **Historical.** Sites of historical or cultural interest should be preserved and where applicable, enhanced.
- Policy COS 11.2** **Historic Preservation.** Assess the historical significance of additional properties over 50 years old and encourage the preservation of public and private buildings which are of local, historical, or cultural importance.
- Policy COS 11.3** **Archaeological Resources.** Assure that all development properly addresses the potential for subsurface archeological deposits by requiring archaeological surveys during the development review process as appropriate.
- Policy COS 11.4** **Cultural Resources.** Review all development and redevelopment proposals for the possibility of including cultural resources, such as the need for individual cultural resource studies and subsurface investigations.

Land Use Element

- Goal LU-12** **Historical and cultural assets that are protected, preserved, and celebrated.**
- Policy LU 12.1** **Historical.** Preserve and enhance sites of historical or cultural interest.
- Policy LU 12.2** **Historic Preservation.** Assess the historical significance of additional properties and encourage the preservation of public and private buildings which are of local, historical, or cultural importance.
- Policy LU 12.3** **Archaeological Resources.** Assure that all development properly addresses the potential for subsurface archeological deposits by requiring archaeological surveys during the development review process as appropriate.
- Policy LU 12.4** **Cultural Resources.** Review all development and redevelopment proposals for the possibility of cultural resources, including the need for individual cultural resource studies and subsurface investigations.

5.10.3 ENVIRONMENTAL SETTING

5.10.3.1 Native American Tribes

According to the General Plan EIR, the Project is within an area historically inhabited by the Gabrieleño Indian Tribe. Development in the Santa Fe Springs area began in the first half of the 19th century; however, the surrounding area could contain archaeological resources that predate Spanish and Mexican land grants. The San Gabriel River, which currently runs adjacent to the City of Santa Fe Springs would have been used

by Native Americans for natural resources such as water and food. However, a majority of the City is heavily developed which has largely reduced the potential for TCRs (City of Santa Fe Springs, 2021b).

5.10.3.2 Site Conditions

As discussed in Section 3.0, *Project Description*, the Project site is heavily disturbed and contains one single-story 3,310 SF office building on the western edge of the property and a 1,282 SF canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of land utilized for oil and gas extraction. As noted in the Geotechnical Investigation prepared for the Project site, included as Appendix E, the Project site is underlain by undocumented artificial fill that was encountered at depths of up to approximately 15 feet below ground surface (LGC Geotechnical, 2024). The artificial fill is most likely associated with the Project site's history of oil drilling and extraction.

5.10.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- TCR-1 Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
- i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
 - ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

5.10.5 METHODOLOGY

The TCR analysis is based on the Cultural Resources Study (Appendix D) prepared for the Project and consultation carried out by the City of Santa Fe Springs pursuant to AB 52. The Cultural Resources Study included an archaeological and historical records search, completed at the South Central Coastal Information Center at California State University, Fullerton. This search included the Project site with an additional one-mile buffer. Pedestrian surveys were conducted at the Project site. The NAHC was also contacted to perform a Sacred Land Files (SLF) search, and local Native American tribes were contacted to elicit local knowledge of cultural resource issues related to the Project.

5.10.6 ENVIRONMENTAL IMPACTS

IMPACT TCR-1: THE PROJECT WOULD NOT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A TRIBAL CULTURAL RESOURCE, DEFINED IN PUBLIC RESOURCES CODE § 21074 AS EITHER A SITE, FEATURE, PLACE, CULTURAL LANDSCAPE THAT IS GEOGRAPHICALLY DEFINED IN TERMS OF THE SIZE AND SCOPE OF THE

LANDSCAPE, SACRED PLACE, OR OBJECT WITH CULTURAL VALUE TO A CALIFORNIA NATIVE AMERICAN TRIBE, AND THAT IS:

- (I) **LISTED OR ELIGIBLE FOR LISTING IN THE CALIFORNIA REGISTER OF HISTORICAL RESOURCES, OR IN A LOCAL REGISTER OF HISTORICAL RESOURCES AS DEFINED IN PUBLIC RESOURCES CODE SECTION 5020.1(K), OR**
- (II) **A RESOURCE DETERMINED BY THE LEAD AGENCY, IN ITS DISCRETION AND SUPPORTED BY SUBSTANTIAL EVIDENCE, TO BE SIGNIFICANT PURSUANT TO CRITERIA SET FORTH IN SUBDIVISION (C) OF PUBLIC RESOURCES CODE § 5024.1. IN APPLYING THE CRITERIA SET FORTH IN SUBDIVISION (C) OF PUBLIC RESOURCE CODE § 5024.1, THE LEAD AGENCY SHALL CONSIDER THE SIGNIFICANCE OF THE RESOURCE TO A CALIFORNIA NATIVE AMERICAN TRIBE.**

Less than Significant with Mitigation Incorporated.

As described previously in Section 5.10.2.2, *State Regulations*, AB 52 requires meaningful consultation between lead agencies and California Native American tribes regarding potential impacts on TCRs, which are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources (PRC Section 21074). On January 8, 2024, an SLF search and a list of Native American tribes who may have knowledge of cultural resources in the Project area were requested from the NAHC. On February 5, 2024, the NAHC responded with a list of Native American tribes and indicated that the SLF search yielded negative results for known TCRs or sacred lands within a 1-mile radius of the Project site. The city sent notices regarding the Project in May 2024 to the Native American tribes provided by the NAHC.

One response was received from the Gabrieleno Band of Mission Indians-Kizh Nation (Kizh Nation) on June 12, 2024, requesting consultation on the Project. The city contacted Kizh Nation on June 25, 2024 to begin consultation. Thereafter, the Kizh Nation provided a list of mitigation measures to be included in the Project on September 3, 2024. Although there was no substantial evidence provided indicating that TCRs, as defined in Public Resources Code Section 21074, are present on the Project site or have been found previously on the Project site, the Project site's location is in an area where Native American tribes are known to have a cultural affiliation. As such, there is the possibility that archaeological resources, including TCRs, could be encountered during ground disturbing construction activities. As such, Mitigation Measures TCR-1, TCR-2, and TCR-3, have been incorporated into the Project. Mitigation Measure TCR-1 would require a Native American monitor to be retained prior to the commencement of ground-disturbing activities. In addition, Mitigation Measure TCR-2 provides procedures to follow in case of an inadvertent TCR discovery. Mitigation Measure TCR-3 provides procedures for inadvertent discovery of human remains and associated funerary or ceremonial objects in compliance with State Health and Safety Code Section 7050.5 and states that no further disturbance may occur in the vicinity of the body until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98.

Based on literature review (i.e., records check and archival research) and pedestrian surveys, no prehistoric resource sites or isolates—including a historic TCR as defined by PRC Section 5020.1(k)—have been identified within the Project site (BFSA, 2024). Additionally, the potential for encountering archaeological resources including TCRs within the Project site is considered low due to the long-term disturbance of the site including clearing, grading, and the steady use for oil well drilling and extraction. However, construction of the proposed Project would include earthmoving activities to depths of 15 feet below the ground surface, which have the potential to disturb previously unknown tribal cultural resources. As a result, Mitigation

Measure TCR-2 and CUL-1 have been included. As mentioned previously, TCR-2 provides procedures in the case of an inadvertent TCR discovery. Mitigation Measure CUL-1, as detailed in the Initial Study, included in Appendix A of this DEIR, provides procedures for an inadvertent discovery of an archaeological resource and procedures should it appear to have Native American origin.

The Project site also does not contain known resources that are significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. However, as mentioned previously, Mitigation Measure TCR-1 has been included to have a Native American monitor to be present for all ground disturbing activities to monitor for inadvertent discoveries during ground disturbing activities.

The Project would also include implementation of PPP CUL-1, in compliance with State Health and Safety Code Section 7050.5, to ensure proper procedures are taken should human remains be unearthed.

Therefore, with implementation of Mitigation Measures CUL-1, TCR-1, TCR-2, TCR-3, and applicable regulations, potential impacts to TCRs would be less than significant.

5.10.7 CUMULATIVE IMPACTS

The cumulative study area for tribal cultural resources includes the City of Santa Fe Springs, which contains the same general tribal historic setting. Other projects throughout the City that would involve ground disturbances could reveal buried tribal cultural resources.

Cumulative impacts to tribal cultural resources would be reduced by compliance with applicable regulations and consultations required by AB 52. As described above, the Project area is not known to contain tribal cultural resources; however, Mitigation Measures CUL-1 and TCR-1 through TCR-3 would be implemented to ensure that impacts would not occur in the case of an inadvertent discovery of a potential tribal cultural resource. These mitigation measures ensure that the Project would not contribute to a cumulative loss of tribal cultural resources. Therefore, potential cumulative impacts would be less than significant.

5.10.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- California Government Code Sections 5097.9-5097.99
- California Health and Safety Code Section 7050.5
- California Public Resources Code Sections 21073 et seq. (AB 52)

Plans, Programs, or Policies

PPP CUL-1: Human Remains. Should human remains or funerary objects be discovered during Project construction, the Project will be required to comply with State Health and Safety Code Section 7050.5, which states that no further disturbance may occur in the vicinity of the body until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine the identity of and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD must complete the inspection within 48 hours of notification by the NAHC.

5.10.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, Impacts TCR-1 (i) and (ii) would be **potentially significant**.

5.10.10 MITIGATION MEASURES

CUL-1: Inadvertent Discovery. In the event that potential archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the City or County List of Qualified Archaeologists has evaluated the find to determine whether the find constitutes a “unique archaeological resource,” as defined in Section 21083.2(g) of the California Public Resources Code. Any resources identified shall be treated in accordance with California Public Resources Code Section 21083.2(g). If the discovered resource(s) appears Native American in origin, a Native American Monitor shall be contacted to issuance of any permits for ground-disturbing activities that include the excavation of soils (including as grading, excavation, and trenching), the City shall ensure that all Project grading and construction plans and specifications include requirement to halt construction activity and contact an archaeologist.

TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

- a. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- b. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
- c. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to Kizh Nation. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the tribe.
- d. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to Kizh Nation from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh Nation monitor and/or Kizh Nation archaeologist. Kizh Nation will recover and retain all discovered TCRs in the form and/or manner the tribe deems appropriate, in the tribe’s sole discretion,

and for any purpose the tribe deems appropriate, including for educational, cultural and/or historic purposes.

TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

- a. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.
- b. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).
- c. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).
- d. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.
- e. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

5.10.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Mitigation Measures CUL-1, TCR-1, TCR-2, and TCR-3, as well as existing regulatory policies, would reduce potential impacts associated with TCRs for Impact TCR-1 (i and ii) to a level that is less than significant. Therefore, no significant and unavoidable adverse impacts related to TCRs would occur.

5.10.12 REFERENCES

- BFS . (2024). *Cultural Resources Study Update for the NW Telegraph & Santa Fe Springs Project*. (**Appendix D**).
- City of Santa Fe Springs. (2021a). *Santa Fe Springs 2040 General Plan*. Retrieved from City of Santa Fe Springs: <https://www.reimaginesantafesprings.org/documents#GP>
- City of Santa Fe Springs. (2021b). *Santa Fe Springs General Plan and Targeted Zoning Code Update Environmental Impact Report*. Retrieved from Re-Imagine Santa Fe Springs 2040 General Plan: <https://www.reimaginesantafesprings.org/documents#GP>
- LGC Geotechnical. (2024, February). *Preliminary Geotechnical Evaluation, APN 8005-0150-051, 12400 Hawkins Street, Santa Fe Springs, CA*. (**Appendix E**)

5.1 1 Utilities and Service Systems

5.11.1 INTRODUCTION

This section of the Draft EIR evaluates the potential effects on utilities and service systems from implementation of the proposed Project by identifying anticipated demand and existing and planned utility availability. This includes water supply and infrastructure, wastewater, drainage, and solid waste. Electric power, natural gas, and telecommunications are discussed below; additionally, energy resource uses are further described in Section 5.2, *Energy*. The analysis in this section is based, in part, on the following documents and resources:

- *Santa Fe Springs General Plan 2040*, adopted in 2022
- *Santa Fe Springs General Plan and Targeted Zoning Code Update Environmental Impact Report*, 2021
- *City of Santa Fe Springs Development Code*
- *City of Santa Fe Springs 2020 Urban Water Management Plan (UWMP)*
- *Low Impact Development Plan*, 2024 (Appendix F)

Because CEQA focuses on physical environmental effects, this section analyzes whether increases in demand for water and wastewater utilities would result from implementation of the Project that would result in significant adverse physical environmental effects. For example, an increase in wastewater generation, by itself, would not be considered a physical change in the environment; however, physical changes in the environment resulting from the construction of new facilities or an expansion of existing wastewater facilities could constitute a significant impact under CEQA.

5.11.2 WATER SERVICES

5.11.2.1 Water Services Regulatory Setting

Federal Regulations

Clean Water Act

The Clean Water Act (CWA) was enacted by Congress in 1972 and is the primary federal law regulating water quality in the United States. The objective of the CWA is to reduce or eliminate water pollution in the nation's rivers, streams, lakes, and coastal waters. The CWA forms the basic national framework for the management of water quality and the control of pollution discharges; it provides the legal framework for several water quality regulations, including the National Pollutant Discharge Elimination System (NPDES), effluent limitations, water quality standards, pretreatment standards, antidegradation policy, nonpoint source discharge programs, and wetlands protection. The United States Environmental Protection Agency (USEPA) has delegated the responsibility for administration of CWA portions to State and regional agencies. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The SWRCB works in coordination with the Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality.

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) was originally passed by Congress in 1974 to protect public health by regulating the nation's public drinking water supply. The SDWA authorizes the USEPA to set national

health-based standards for drinking water to protect against both naturally-occurring and man-made contaminants that may be found in drinking water. The law was amended in 1986 and 1996 to recognize source water protection, operator training, funding for water system improvements, and public information as important components of safe drinking water. This approach ensures the quality of drinking water by protecting it from source to tap. The US EPA, states, and water systems then work together to make sure that these standards are met. The Safe Drinking Water Act applies to every public water system in the United States.

State Regulations

California Urban Water Management Planning Act

Section 10610 of the California Water Code established the California Urban Water Management Planning Act (CUWMPA), requires urban water suppliers to initiate planning strategies to ensure an appropriate level of reliability in its water service. CUWMPA states that every urban water supplier that provides water to 3,000 or more customers, or that annually provides more than 3,000 acre-feet of water service, should make every effort to ensure the appropriate level of reliability in its water service to meet the needs of its various categories of customers during normal, dry, and multiple-dry years. CUWMPA describes the contents of UWMP's as well as methods for urban water suppliers to adopt and implement the plans.

CalGreen Building Code

California Code of Regulations Title 24, Part 11, establishes the California Green Building Code or CALGreen. The CALGreen Code is updated every three years. It was recently updated in 2022 and became effective January 1, 2023. CALGreen sets forth water efficiency standards (i.e., maximum flow rates) for all new plumbing and irrigation fittings and fixtures.

Local and Regional Regulations

City of Santa Fe Springs General Plan

The City of Santa Fe Springs General Plan contains the following policies related to water that are applicable to the Project (City of Santa Fe Springs, 2021a):

Goal C-12 A Sustainable and Reliable Water Supply

C-12.1 Adequate Water Supply. Ensure adequate sources of water supply sufficient to serve existing and future development and consider long-term climate change impacts to water demand and supply.

C-12.2 Water Conservation. Enforce conservation measure that eliminate or penalize wasteful uses of water as a response to drought, climate change, and other threats to adequate water supply.

C-12.5 Water Quality. Comply with all applicable water quality standards.

Goal COS-4 Clean Surface Water, Drainages, and Groundwater

COS-4.3 Groundwater Supply Contamination. Evaluate all proposed non-residential development plans, activities, and uses for their potential to create hazards from point and non-point sources and confer with other appropriate agencies to assure adequate review.

City of Santa Fe Springs Code of Ordinances

Chapter 54 Section 54.1 – Water Conservation. To prevent the waste and unreasonable use of water and to promote water conservation. The City promotes water use efficiency through water efficient landscape requirements which were adopted by Ordinance in December 2015. The code applies to new landscape projects that are 500 square feet or greater and rehabilitated landscape projects 2,500 square feet or greater. The code section provides implementation procedures and water use standards for the purpose of providing water efficient landscapes in compliance with State law.

Article 4, Chapter 10 – Water Management Plan. The City created a comprehensive Water Conservation Program pursuant to the California Water Code based upon the need to conserve water supplies and to avoid or minimize the effects of any future shortages. The Water Conservation Program establishes permanent water use restrictions and regulations to be implemented during times of declared water shortages. It establishes six levels of drought response actions to be implemented in times of shortage, with increasing restrictions on water use in response to worsening drought conditions and decreasing available supplies.

5.11.2.2 Water Services Environmental Setting

The Project site is located within the water service area of the Santa Fe Springs Water Utility Authority (SFSWUA). The SFSWUA provides retail water service to most of the City and covers approximately 90% of the land within the City as well as a small area in the City of Downey. SFSWUA participates in the City of Santa Fe Springs 2020 Urban Water Management Plan (UWMP). The UWMP is a tool that provides a summary of anticipated water supplies and demands for the next 20 years for the region that services the City of Santa Fe Springs (Santa Fe Springs, 2021).

SFSWUA operates a network of water pipelines, reservoirs, pumping and water treatment facilities to deliver treated drinking water to its customers. Currently, there is an existing 12-inch water main within Hawkins Street (west of the Project site), 16-inch water main within Telegraph Road (south of the Project site), and a 12-inch water line within Santa Fe Springs Road (east of the Project site).

Water Supply and Demand

The City of Santa Fe Springs has four sources of water supply: treated groundwater through the Central Basin Water Quality (CBWQPP) Protection Program; treated imported water purchased from the Metropolitan Water District (MWD) through (CBMWD); imported treated water purchased from the CBWQPP; and recycled water from CBMWD. Table 5.11-1 summarizes SFSWUA's current retail water supplies. As shown on Table 5.11-1, in 2020 the SFSWUA obtained the majority of its water supply from purchased or imported water from the Central Basin MWD and from purchased or imported water from the CBWQPP. Water from the Central Basin MWD is primarily from treated groundwater (City of Santa Fe Springs, 2021).

Table 5.11-1: Santa Fe Springs 2020 Water Supply (AF)

Water Supply	Source	Actual Volume (acre-feet)
Purchased or Imported Water	Central Basin MWD	2,564
Purchased or Imported Water	CBWQPP	2,413
Groundwater (not desalinated)	Central Basin	0
Recycled Water	CBMWD	846
Total Volume of Water in AF		5,823

Source: Urban Water Management Plan, City of Santa Fe Springs, 2021.

Table 5.11-2 summarizes the City's projected overall water supplies. As shown in Table 5.11-2, the 2020 UWMP estimates that water supplies in the future are anticipated to be obtained through a similar mix of purchased or imported water and recycled water. The 2020 UWMP anticipates that the City's water supply will increase from 6,346 AF in 2025 to 6,947 AF in 2045 (increase of 601 AF) to meet the City's anticipated growth in water demands. The UWMP 2045 water supply projections anticipate that approximately 3,697 AF (or 53 percent) would be from purchased or imported water from the Central Basin MWD, 2,350 AF (or 33 percent) would be from purchased or imported water from CBWQPP, and 900 AF (or 13 percent) would be from recycled water from CBMWD.

Table 5.11-2: Santa Fe Springs Projected Water Supply (AF)

Water Supply	Source	2025	2030	2035	2040	2045
Purchased or Imported Water	Central Basin MWD	3,096	3,242	3,390	3,542	3,697
Purchased or Imported Water	CBWQPP	2,350	2,350	2,350	2,350	2,350
Recycled Water	CBMWD	900	900	900	900	900
Total Volume of Water in AF		6,346	6,492	6,640	6,792	6,947

Source: Urban Water Management Plan, City of Santa Fe Springs, 2021.

Projected demands for the City were developed using populations projections from the Department of Water's (DWR) Population Tool and recent per capita water use for SFSWUA's service area.

The water demand projections in normal years anticipate a demand of approximately 6,346 AF in 2025 and approximately 6,947 AF in 2045, resulting in approximately 9.5 percent growth in total water demand from 2025 to 2045, shown in Table 5.11-3.

Table 5.11-3: Santa Fe Springs Projected Water Demand in Normal Years (AF)

Water Source	2025	2030	2035	2040	2045
Potable Water, Raw, Other Non-potable	5,446	5,592	5,740	5,892	6,047
Recycled Water	846	900	900	900	900
Total Water Demand	6,346	6,492	6,640	6,792	6,947

Source: Urban Water Management Plan, City of Santa Fe Springs, 2021.

Water supply and demand projections for normal, single dry year, and multiple dry years are shown in Table 5.11-4. As shown, the City has adequate supplies to serve 100 percent of its customers during normal, dry year, and multiple dry year demand through 2045.

Table 5.11-4: Santa Fe Springs Projected Water Demand in Normal, Single and Multiple Dry Years (AF)

Water Source	2025	2030	2035	2040	2045
Normal Year					
Supply Totals	6,346	6,492	6,640	6,792	6,947
Demand Totals	6,346	6,492	6,640	6,792	6,947
Difference	0	0	0	0	0
Single Dry Year					
Supply Totals	6,671	6,822	6,978	7,138	7,302

Water Source	2025	2030	2035	2040	2045
Demand Totals	6,671	6,822	6,978	7,138	7,302
Difference	0	0	0	0	0
Multiple Dry Years					
<i>First Year</i>					
Supply Totals	7,138	7,300	7,467	7,638	7,814
Demand Totals	7,138	7,300	7,467	7,638	7,814
Difference	0	0	0	0	0
<i>Second Year</i>					
Supply Totals	7,577	7,750	7,927	8,108	8,295
Demand Totals	7,577	7,750	7,927	8,108	8,295
Difference	0	0	0	0	0
<i>Third Year</i>					
Supply Totals	7,837	8,015	8,198	8,386	8,579
Demand Totals	7,837	8,015	8,198	8,386	8,579
Difference	0	0	0	0	0
<i>Fourth Year</i>					
Supply Totals	7,126	7,288	7,455	7,626	7,801
Demand Totals	7,126	7,288	7,455	7,626	7,801
Difference	0	0	0	0	0
<i>Fifth Year</i>					
Supply Totals	6,515	6,664	6,816	6,972	7,132
Demand Totals	6,515	6,664	6,816	6,972	7,132
Difference	0	0	0	0	0

Source: Urban Water Management Plan, City of Santa Fe Springs, 2021

Groundwater:

The City of Santa Fe Springs relies on groundwater produced from the Central Basin. The Central Basin was deemed an adjudicated basin on October 11, 1965 by the Los Angeles Superior Court and came into effect October 1 of the following year. The adjudication of the Central Basin gave several water producers groundwater and pumping rights and appointed the Department of Water Resources (DWR) as Watermaster. Under the Central Basin judgement, water rights are fixed, and water producers cannot exceed their water rights by more than 20 percent or 20 AF, whichever is greater, in any year and an adjustment is made the following year; and cannot carry over more than 20 percent or 20 AF, whichever is greater, of their water rights for use in the following year (UWMP,2021).

The Central Basin judgement has been amended on three separate occasions (1980, 1991, 2013). Under the 2013 judgement amendment, the court confirmed the retirement of DWR as the Watermaster and appointed the Water Replenishment District of Southern California as the new Watermaster to manage the Central Basin. The 2013 judgement amendment also implemented a water storage program which states that a party may store up to 200 percent of the party's Allowed Pumping Allocation, if space is available; and allows parties to convert unused Allowed Pumping Allocation to stored water as well as revised the amount of carryover to be equal to 100 percent of the party's Allowed Pumping Allocation minus the amount of carryover water set aside for storage (UWMP, 2021).

The Central Basin covers approximately 270 square miles and is one of two groundwater basins in the Coastal Plain of Los Angeles. The total storage capacity of the Central Basin is estimated at approximately 13,800,000 AF. The City's current allowed pumping allocation from the Central Basin is 4,035.78 AFY (City of Santa Fe Springs, Urban Water Management Plan, 2021).

The City owns three wells within the Central Basin, however, the City has not produced groundwater from the Central Basin since 2014 due to water quality issues (City of Santa Fe Springs, 2021). The City currently purchases treated Central Basin groundwater from the CBWQPP (City of Santa Fe Springs, Urban Water Management Plan, 2021). The City receives the treated groundwater through an interconnection with the City of Whittier.

Recycled Water: CBMWD provides recycled water produced from Los Angeles County Sanitation Districts' (LACSD) Los Coyotes Water Reclamation Plant (LCWRP) in Cerritos and San Jose Creek Water Reclamation Plant (SJCWRP) in Whittier to the City of Santa Fe Springs. Recycled water is used within the City's service area for landscape irrigation at city parks, schools, athletic fields, roadway medians, and business complexes, as well as industrial purposes, including carpet manufacturing, concrete mixing, and cooling tower use (City of Santa Fe Springs, Urban Water Management Plan, 2021).

5.11.2.3 Water Services Thresholds of Significance

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- UTIL-1 Require or result in the relocation or construction of new or expanded water, the construction or relocation of which could cause significant environmental effects.
- UTIL-2 Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

5.11.2.4 Water Services Methodology

The evaluation of water supply quantifies the amount of water that would be required to support operation of the proposed Project and compares the demand to the SFSWUA's available water supply to identify if sufficient water supplies available to serve the Project and reasonably foreseeable development during normal, dry, and multiple dry years. Additionally, the existing water supply infrastructure that serves the Project site was identified and evaluated to ensure design capacity would be adequate to supply the proposed Project, or to identify if expansions would be required to serve the proposed development.

5.11.2.5 Water Services Environmental Impacts

IMPACT UTIL-1: THE PROJECT WOULD NOT REQUIRE OR RESULT IN THE RELOCATION OR CONSTRUCTION OF NEW OR EXPANDED WATER, THE CONSTRUCTION OR RELOCATION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS.

Less than Significant Impact. The proposed Project would develop two new concrete tilt-up industrial warehouse buildings with a combined total building area of 584,678 SF and a combined total footprint of 564,678 SF. The Project would construct new 8-inch water lines onsite that would connect to the existing 12-inch water line in Hawkins Street. No additional offsite water infrastructure would be constructed to serve the proposed Project.

The new onsite water lines would convey water supplies to the proposed industrial warehouse buildings and landscaping through plumbing/landscaping fixtures that are compliant with the CalGreen Plumbing Code (adopted in the City's Municipal Code as Section 150.001) for efficient use of water.

The construction activities related to the new onsite water infrastructure that would be needed to serve the proposed warehouses are included as part of the Project and would not result in any physical environmental effects beyond those identified throughout this Draft EIR. For example, construction emissions for excavation and installation of the water infrastructure are included in Sections 5.1, *Air Quality*, and 5.4, *Greenhouse Gas Emissions*. Therefore, the proposed Project would not result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, and impacts would be less than significant.

IMPACT UT-2: THE PROJECT WOULD HAVE SUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROJECT AND REASONABLY FORESEEABLE FUTURE DEVELOPMENT DURING NORMAL, DRY, AND MULTIPLE DRY YEARS.

Less than Significant Impact. As previously mentioned, the proposed Project would develop two new concrete tilt-up industrial warehouse buildings with a combined total building area of 584,678 SF and a combined total footprint of 564,678 SF. The City of Santa Fe Springs 2020 Urban Water Management Plan (UWMP), adopted in July 2021, was prepared for the SFSWUA and therefore accounts for the water usage that would be attributed to development of the Project site. As shown in Table 5.11-4, *Santa Fe Springs Projected Water Demand and Supply During Normal, Single and Multiple Dry Years (AF)*, the SFSWUA has verified that it has the water supplies available during normal, single-dry, and multiple-dry years within a 20-year projection that would meet the projected demand associated with the Project, in addition to existing and planned future uses in the City.

Additionally, the 2020 UWMP detailed a 2020 water demand of 223 gallons per capita per day (GPCD) and a baseline target goal of 250 GPCD. However, to conservatively estimate water used for warehouse and office uses for the proposed Project, a water demand rate of .05 gallons per day per square foot was used for warehousing and a water demand rate of .3 gallons per day per square foot was used for office uses (City of Santa Fe Springs, 2023). As described previously, the Project includes development of two warehouse buildings with a combined total building area of 584,678 SF, inclusive of 5,000 SF of office space within each building. Thus, the Project would generate an increased water demand of 31,734 gallons per day or 35.55 AFY, which is within the projected demand and supply for water from 2025 to 2045, as shown on Table 5.11-4.

The 2020 UWMP anticipates that the SFSWUA's water supply will increase from 6,346 AFY in 2025 to 6,947 AFY in 2045 (increase of 601 AFY) to meet the SFSWUA's anticipated growth in water demands. The Project's additional demands of 35.55 AFY is less than the 9.5% projected increase in water supply for the City; therefore, the Project's increase in water demand would be within the forecasted growth and would not exceed the projected demand and supply for SFSWUA. Further, the proposed Project would be consistent with existing land use and growth projections that are included in the UWMP projections; and thus, is included in the UWMP projections and SFSWUA would be able to meet all of the anticipated water supply needs.

Based on the data within the UWMP, existing and future water entitlements from groundwater, surface water, and purchased or imported water sources, plus recycling and conservation, would be sufficient to meet the Project's demand at buildout, and would be consistent with forecasted demand for SFSWUA's service area. Thus, there would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years and impacts would be less than significant.

5.11.2.6 Water Services Cumulative Impacts

Cumulative water supply impacts are considered on a water purveyor basis and are associated with the capacity of the infrastructure system and the adequacy of the water purveyor's infrastructure and primary

sources of water that include groundwater, surface water, and purchased or imported water. Potential impacts related to water supply and infrastructure are based on the projections contained within SFSWUA's 2020 UWMP.

As discussed above, the Project would result in an increase in water demand of 35.55 AFY and the existing and future water entitlements from groundwater, surface water, and purchased or imported water sources, plus recycling and conservation, would be sufficient to meet the Project's demand and would be consistent with forecasted demand for SFSWUA's service area. As a result, the Project would not result in a cumulatively considerable increase in water supply demands that would require increased need for water supplies that could be significant. Thus, impacts related to water demand and supply would be less than cumulatively significant.

The construction activities related to the new water infrastructure that would be needed to serve the proposed Project are included as part of the Project and would not result in any physical environmental effects beyond those identified throughout this Draft EIR. For example, analysis of construction emissions for excavation and installation of the water infrastructure and related mitigation measures are included in Sections 5.3, *Air Quality* and 5.7, *Greenhouse Gas Emissions*. As the Project would be required to implement mitigation measures related to construction activities, including those required for installation of the proposed water infrastructure, impacts would be less than significant. Further, the significant and unavoidable impacts that are identified within this EIR, which consist of VMT impacts, are not related to the construction of the proposed water infrastructure. Thus, potential cumulative impacts related to water infrastructure would be less than significant.

5.11.2.7 Water Services Existing Regulations and Plans, Programs, or Policies

Existing Regulations

The following standard regulations would reduce potential impacts related to water supplies:

- California Code of Regulations Title 24, Part 11; the California Green Building Code

5.11.2.8 Water Services Level of Significance Before Mitigation

Impacts UT-1 and UT-2 would be less than significant.

5.11.2.9 Water Services Mitigation Measures

No mitigation measures are required.

5.11.2.10 Water Services Level of Significance After Mitigation

No significant unavoidable adverse impacts related to water supplies or water infrastructure would occur.

5.11.3 WASTEWATER SERVICES

5.11.3.1 Wastewater Services Regulatory Setting

Local and Regional Regulations

City of Santa Fe Springs General Plan

The City of Santa Fe Springs General Plan contains the following policies related to wastewater that are applicable to the Project (City of Santa Fe Springs, 2021a).

Policy COS-7.2 Increased Use of Recycled Water. Support initiatives of the Los Angeles County Sanitation Districts to increase availability and use of recycled wastewater.

Goal C-13 A Sanitary Sewer System with Capacity to Accommodate Future Growth

Policy C-13.1 Wastewater Capacity. Monitor and analyze wastewater systems capacity and determine costs to construct relief wastewater systems as needed.

Policy C-13.2 Sanitation District Consultation. Consult with Los Angeles County Sanitation Districts to ensure all trunk sewer are maintained.

Policy C-13.4 Unacceptable Waste Discharge. Prevent unacceptable wastes from being discharged into the wastewater system.

Policy C-13.5 Wastewater Technology. Explore new technologies that treat and process wastewater onsite to reduce overall capacity needs of the centralized wastewater system.

5.11.3.2 Wastewater Services Environmental Setting

The wastewater generated within the City is collected by the City's local sewer system and the Los Angeles County Sanitation District (LACSD's) trunk sewer system, and treated by the Los Coyotes Water Reclamation Plant (LCWRP) and the Long Beach Water Reclamation Plant (LBWRP) (City of Santa Fe Springs, UWMP, 2021). Currently, LCWRP has a design capacity of 37.5 million gallons/day (MGD) and an average flow of 21.7 MGD. LBWRP currently has a design capacity of 25 MGD and an average flow of 12.6 MGD. The two reclamation plants have a combined design capacity of 62.5 MGD which is equivalent to approximately 70,055 AFY (UWMP, 2020). The Project site would fall within the LCWRP's service area.

5.11.3.3 Wastewater Services Thresholds of Significance

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- UTIL-3 Require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects.
- UTIL-4 Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

5.11.3.4 Wastewater Services Methodology

The evaluation of wastewater infrastructure quantifies the amount of wastewater that would be generated from operation of the proposed Project and compares the demand to the existing and planned sewer infrastructure and wastewater treatment plants. The evaluation identifies if expansions would be required to serve the proposed development, and if those expansions have the potential to result in an environmental impact.

5.11.3.5 Wastewater Services Environmental Impacts

IMPACT UTIL-3: THE PROJECT WOULD NOT REQUIRE OR RESULT IN THE RELOCATION OR CONSTRUCTION OF NEW OR EXPANDED WASTEWATER TREATMENT FACILITIES, THE CONSTRUCTION OR RELOCATION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS.

Less than Significant Impact. The Project would develop and operate new industrial warehouse facilities that would generate wastewater. The proposed Project does not currently have any sewer infrastructure onsite. Thus, the proposed Project would install 6-inch sewer laterals in the western portion of the site that would connect to a proposed 10-inch sewer main within Hawkins Street. The proposed 10-inch sewer main would extend approximately 250 feet west of the Project site and connect to the existing 8-inch line in Hawkins Street. Installation of this sewer infrastructure is part of construction of the proposed Project and would not result in any physical environmental effects beyond those described throughout this document.

The construction activities related to the new onsite sewer system and connection to the existing 8-inch sewer main is included as part of the proposed Project and would not result in any physical environmental effects beyond those identified throughout this Draft EIR. For example, construction emissions for excavation and installation of the sewer infrastructure is included in Section 5.3, *Air Quality* and 5.7, *Greenhouse Gas Emissions*. Therefore, the proposed Project would not result in the construction of new sewer facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. As the Project would be required to implement mitigation measures related to construction activities, including those required for installation of the proposed sewer infrastructure, impacts would be less than significant. Thus, with construction related mitigation as detailed under other resource topic areas, impacts related to the proposed expansion and construction of new wastewater facilities would be less than significant.

IMPACT UTIL-4: THE PROJECT WOULD NOT RESULT IN A DETERMINATION BY THE WASTEWATER TREATMENT PROVIDER, WHICH SERVES OR MAY SERVE THE PROJECT, THAT IT HAS ADEQUATE CAPACITY TO SERVE THE PROJECT'S PROJECTED DEMAND IN ADDITION TO THE PROVIDER'S EXISTING COMMITMENTS.

Less than Significant Impact. The City provides wastewater collection to the Project area and LACSD provides wastewater treatment to the City via the LCWRP and LBWRP. As previously mentioned, the Project site would be serviced by LCWRP. Currently, LCWRP has a design capacity of 37.5 MGD and an average flow of 21.7 MGD (LACSD, 2024).

According to LACSD's wastewater generation rates, warehouses generate approximately 25 gpd per 1,000 SF and office uses generate approximately 200 gpd per 1,000 SF (LACSD, 2024). Thus, the proposed Project would generate approximately 16,367 gallons of wastewater per day ($574,678 \text{ SF} / 1,000 \text{ SF} \times 25 \text{ gpd} = 14,367 \text{ gpd} + 10,000 \text{ SF} / 1,000 \text{ SF} \times 200 \text{ gpd} = 2,000 \text{ gpd}$).

Under existing conditions, the LCWRP has a remaining treatment capacity of approximately 15.8 MGD (37.5 MGD-21.7 MGD). Implementation of the Project would utilize approximately 0.104 percent of LACSD's excess treatment capacity daily. Thus, LCWRP has ample capacity to serve the proposed Project,

and the Project would not create the need for any new or expanded wastewater facility (such as conveyance lines, treatment facilities, or lift stations) to serve the proposed Project. Therefore, impacts related to wastewater treatment capacity would be less than significant.

5.11.3.6 Wastewater Services Cumulative Impacts

Cumulative wastewater infrastructure impacts are considered on a systemwide basis and are associated with the overall capacity of existing and planned infrastructure and based on County growth projections that are utilized by LACSD for facilities planning. The cumulative system evaluated includes the sewer system that serves the Project site and conveys wastewater to the LACSD wastewater treatment system.

As described previously, with the proposed Project, the sewer system and wastewater treatment plant would have sufficient capacity to handle the increased flows resulting from implementation of the proposed Project. The continued regular assessment and maintenance of the existing sewer system by LACSD would reduce the potential of cumulative development projects to result in a cumulatively substantial increase in wastewater such that new or expanded facilities would be required. Thus, increases in wastewater in the sewer system would result in a less than significant cumulative impact.

5.11.3.7 Wastewater Services Existing Regulations and Plans, Programs, or Policies

None.

5.11.3.8 Wastewater Services Level of Significance Before Mitigation

Impacts UT-3 and UT-4 would be less than significant.

5.11.3.9 Wastewater Services Mitigation Measures

No mitigation measures are required.

5.11.3.10 Wastewater Services Level of Significance After Mitigation

No significant unavoidable adverse impacts related to wastewater infrastructure would occur.

5.11.4 STORMWATER DRAINAGE

5.11.4.1 Stormwater Drainage Regulatory Setting

Local and Regional Regulations

City of Santa Fe Springs General Plan

The City of Santa Fe Springs General Plan contains the following policies related to wastewater that are applicable to the Project (City of Santa Fe Springs, 2021a):

Goal C-14 A Sustainable and Resilient Stormwater System

Policy C-14.1 Green Infrastructure. Promote green infrastructure projects that capture stormwater for reuse, improved water quality, and reduced flooding risk, including but not limited to permeable pavements rain gardens, bioswales, vegetative swales, infiltration trenches,

green roofs, planter boxes, and rainwater harvesting/rain barrels or cisterns/rain barrels or cisterns for public and private project.

Policy C-14.3 Storm Drain Pollution. Implement all appropriate programs and requirements to reduce the amount of pollution entering the storm drain system waterways.

Policy C-14.4 Surface Water Infiltration. Encourage site drainage features that reduce impermeable surface area, increase surface water infiltration, and minimize surface water runoff during storm events.

Policy C-14.5 Permeable Surfaces. Encourage the reduction of impervious surfaces by discouraging excess parking areas, enforcing low-impact development and best management practices treatment methods, and increasing greenery, as well as increasing the City's inventory of green spaces.

Policy COS-4.4 Runoff Pollution Prevention. Require that new developments incorporate features into site drainage plans that reduce impermeable surface area, increase surface water infiltration, and minimize surface water runoff during storm events. Such features may include additional landscape areas, parking lots with bio-infiltration systems, permeable paving designs, and stormwater detention basins.

City of Santa Fe Springs Code of Ordinances

Title V. Public Works, Chapter 52 – Stormwater Management and Discharge Control. Chapter 52 sets forth requirements for the construction and operation of development projects to ensure compliance with the stormwater measures pursuant to the MS4 permit and municipal NPDES permit. This chapter also provides applicable best management practices and other stormwater pollution control measures.

5.11.4.2 Stormwater Drainage Environmental Setting

Topographically, the Project site is relatively flat with an elevation of 131 feet above mean sea-level to 164 feet above mean sea-level with no areas of significant topographic relief. The site is relatively flat and generally drains from northeast to southwest. The existing site is heavily disturbed and mostly unvegetated, except for a sparse nonnative herbaceous layer and one nonnative tree at the southeast corner of the site.

Runoff from the Project site currently drains into an existing 51-inch reinforced concrete pipe storm drain that runs parallel to and in some portions a few feet inside the Project's east property line and connects to a 54-inch storm drain below Telegraph Road. This 54-inch storm drain runs west until it connects to a Los Angeles County Flood Control District drain, and eventually drains into the San Gabriel River.

5.11.4.3 Stormwater Drainage Thresholds of Significance

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

UTIL-5 Require or result in the relocation or construction of new or expanded storm water drainage facilities, the construction or relocation of which could cause significant environmental effects.

5.11.4.4 Stormwater Drainage Service Methodology

The evaluation of stormwater drainage infrastructure quantifies the amount of impervious surfaces and stormwater runoff that would be generated from the proposed Project and identifies if runoff from the Project would be accommodated by the existing stormwater drainage infrastructure. The evaluation

identifies if expansions would be required to serve the proposed development, and if those expansions have the potential to result in an environmental impact.

5.11.4.5 Stormwater Drainage Environmental Impacts

IMPACT UTIL-5: THE PROJECT WOULD NOT REQUIRE OR RESULT IN THE RELOCATION OR CONSTRUCTION OF NEW OR EXPANDED STORMWATER DRAINAGE FACILITIES, THE CONSTRUCTION OR RELOCATION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS.

Less than Significant Impact. The Project would install several inlet drains and roof drains that would connect to two proposed underground infiltration systems. Overflow from both infiltration systems would be conveyed to the existing 51-inch storm drain along the site's eastern boundary, below Hawkins Street. The stormwater infrastructure would capture and treat the 85th percentile of a 24-hour storm event, consistent with the County MS4 Permit requirements. As such, no off-site storm drain improvements would be required for the Project.

Impacts associated with the Project's proposed onsite stormwater drainage infrastructure are included as part of the construction of the Project and would not result in any physical environmental effects beyond those identified throughout this EIR. As such, there are no environmental impacts that would occur specifically related to the Project's proposed stormwater drainage infrastructure. Therefore, Project impacts due to stormwater drainage infrastructure would be less than significant.

5.11.4.6 Stormwater Drainage Cumulative Impacts

The geographic scope for cumulative impacts related to stormwater drainage includes the geographic area served by the existing stormwater infrastructure for the Project area, from capture of runoff through final discharge points. As described above the proposed Project includes installation of two new onsite storm underground filtration systems that would capture and retain stormwater from the site. Overflow from both infiltration systems would be conveyed to the existing 51-inch storm drain along the site's eastern boundary, below Hawkins Street. Additionally, no off-site storm drain improvements would be required for this Project that could be cumulatively significant.

The existing local, state, and regional regulations require development projects to maintain pre-project hydrology, thus no net increase of offsite stormwater flows would occur. RWQCB permit conditions require a hydrology/drainage study to demonstrate that all runoff would be appropriately conveyed and not leave the project sites at rates exceeding pre-project conditions, prior to receipt of necessary permits. As a result, increases of runoff from cumulative projects that could cumulatively combine to impact stormwater drainage capacity would not occur, and cumulative impacts related to drainage infrastructure would be less than significant.

5.11.4.7 Stormwater Drainage Existing Regulations and Plans, Programs, or Policies

None.

5.11.4.8 Stormwater Drainage Level of Significance Before Mitigation

Impact UT-5 would be less than significant.

5.11.4.9 Stormwater Drainage Mitigation Measures

No mitigation measures are required.

5.11.4.10 Stormwater Drainage Level of Significance After Mitigation

No significant unavoidable adverse impacts related to drainage would occur.

5.11.5 SOLID WASTE SERVICES

5.11.5.1 Solid Waste Services Regulatory Setting

State Regulations

Assembly Bill 341

AB 341 established a state policy goal that no less than 75 percent of solid waste generated be source reduced, recycled, or composted by 2020, and requiring CalRecycle to provide a report to the Legislature that recommends strategies to achieve the policy goal. AB 341 also requires businesses and multi-family residential dwellings of five units or more, that generate four or more cubic yards of commercial solid waste per week to implement recycling programs.

Assembly Bill 939

The California Integrated Waste Management Act Requires cities and counties to prepare integrated waste management plans (IWMPs) and to divert 50 percent of solid waste from landfills beginning in calendar year 2000 and each year thereafter. AB 939 also requires cities and counties to prepare Source Reduction and Recycling Elements (SRRE) as part of the IWMP. These elements are designed to develop recycling services to achieve diversion goals, stimulate local recycling in manufacturing, and stimulate the purchase of recycled products.

Assembly Bill 1826

AB 1826 requires businesses to recycle their organic waste, dependent on the amount of waste generated per week. This law requires that local jurisdictions implement an organic waste recycling program to divert organic waste generated by businesses and multifamily residential dwellings that consist of five or more units.

Assembly Bill 827

AB 827 requires businesses subject to AB 1826 and AB 341 provide customers with easily accessible recycling and organics collection bins or containers to collect these materials generated from products purchased on the premises.

Senate Bill (SB) 1016

This requires that the 50 percent solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 changed the CalRecycle review process for each municipality's IWMP. The CalRecycle Board reviews a jurisdiction's diversion rate compliance in accordance with a specified schedule.

Senate Bill 1383

SB 1383 established regulations aimed to reduce organic waste disposal 75 percent and reduce least 20 percent of currently disposed surplus edible food by 2025. The intent of the law is to reduce methane, increase landfill usage, and provide additional food sources for Californians.

California Green Building Standards

Section 5.408.1 Construction waste diversion. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste.

Section 5.410.1 Recycling by occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals, or meet a lawfully enacted local recycling ordinance, if more restrictive.

Local and Regional Regulations

Los Angeles Countywide Integrated Waste Management Plan

Pursuant to AB939, the County prepared the 1996 Countywide Integrated Waste Management Plan (CIWMP) in collaboration with its cities to ensure a coordinated effort at solid waste reduction and landfiling. The CIWMP is comprised of five key elements, the Countywide Summary Plan, the Countywide Siting Element, the Source Reduction and Recycling Element (SRRE), the Household Hazardous Waste Element (HHWE) and the Non-Disposal Facility Element (NDFE).

City of Santa Fe Springs Code of Ordinances

Title V. Public Works, Chapter 50, Collection of Solid Waste and Recyclables. Chapter 50 sets forth rules and regulations for the collection of solid waste and recyclables and operation of development projects to ensure compliance with the solid waste and recyclable measures pursuant to the Assembly Bills 939, 341, 1826, and State Bill 1383.

5.11.5.2 Solid Waste Services Environmental Setting

The proposed Project site currently contains one single-story 3,310-square-foot (SF) office building on the westernmost portion and a 1,282 SF canopy structure to the northeast of the building. In addition, the site contains over 100 active, plugged, idle, and/or cancelled oils wells, and six pumpjacks along with tanks, pipes, and associated infrastructure.

The City of Santa Fe Springs is currently contracted with Republic Services and Serv-well Disposal Solid for waste collection, disposal, and recycling services for non-residential uses. Solid waste generated by the City is disposed of at the Savage Canyon Landfill, located approximately 3.5 miles northwest of the proposed Project site. The Savage Canyon Landfill has a daily permitted throughput of 3,350 tons per day of solid waste and is permitted to operate through December 2079. In 2023, the landfill received a total of 86,576.96 tons which results in an average of 237 tons per day (CalRecycle, 2024). Thus, the facility had a remaining capacity of 3,071 tons per day.

In addition, the most recent data on the CalRecycle Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility database identifies that in 2019, 34 percent of the solid waste from the City was disposed of at the Frank Bowerman Landfill, 23 percent at the Sunshine Canyon Landfill, and 12 percent at the Savage Canyon Landfill, which is the closest landfill to the Project Site. Thus, although the General Plan EIR identifies

the Savage Canyon Landfill as the primary landfill, it is likely that solid waste produced by the City would also be disposed of at the Frank Bowerman Landfill and at the Sunshine Canyon Landfill.

The Frank Bowerman Landfill, which is located approximately 31.8 miles away is permitted to accept 11,500 tons per day of solid waste and is permitted to operate through 2053. In January 2024, the maximum tonnage received was 8,710.78 tons. Thus, the facility had a remaining capacity of 2,789 tons per day (CalRecycle, 2024).

The Sunshine Canyon Landfill, which is located approximately 37.8 miles away is permitted to accept 12,100 tons per day of solid waste and is permitted to operate through 2037. In 2023, the landfill received a total of 2,358,927.59 tons which results in an average of 6,463 tons per day. Thus, the facility had a remaining capacity of 5,637 tons per day (CalRecycle, 2024).

The Adelanto Soil Safe of California Facility, which allows for the disposal of contaminated soil, has a maximum capacity of 5,000 tons per day. In May of 2024 the facility had a maximum incoming volume of 1,735.22 tons of waste per day. Thus, the facility had a remaining capacity of 3,264.78 tons per day (CalRecycle, 2024).

5.11.5.3 Solid Waste Services Thresholds of Significance

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- UTIL-6 Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.
- UTIL-7 Comply with federal, State, and local management and reduction statutes and regulations related to solid waste.

5.11.5.4 Solid Waste Service Methodology

Solid waste generation from construction and operation of the Project was estimated using a default construction and operation waste generation factor from CalEEMod used for the the Air Quality, and Energy, and GHG Impact Analysis prepared by EPD Solutions (Appendix B). Solid waste volumes were then compared with recent estimates of remaining disposal capacity of the landfill serving the City. In addition, potential impacts related to compliance with solid waste regulations was evaluated by identifying how the proposed Project would implement the relevant requirements.

5.11.5.5 Solid Waste Environmental Impacts

IMPACT UTIL-6: THE PROJECT WOULD NOT GENERATE SOLID WASTE IN EXCESS OF STATE OR LOCAL STANDARDS, OR IN EXCESS OF THE CAPACITY OF LOCAL INFRASTRUCTURE, OR OTHERWISE IMPAIR THE ATTAINMENT OF SOLID WASTE REDUCTION GOALS.

Less than Significant Impact.

The proposed Project would result in new development that would generate solid waste. All solid waste-generating activities within the City are subject to the requirements set forth in the 2022 California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste pursuant to Municipal Code Section 5.408.1. Implementation of the proposed Project would be consistent with all state regulations, as ensured through the City's development Project permitting process.

Construction

The proposed Project involves demolition of the existing building onsite, abandonment and removal of existing oil infrastructure, and disposal of contaminated soils. The Project would also generate solid waste from construction packaging, remanent construction materials, and other construction waste. As discussed in Section 5.5-9, *Hazards and Hazardous Materials*, the proposed Project site is located in an area that has historically been used for oil production and thus, the proposed Project site contains contaminated soils and contaminated oil infrastructure. Solid waste and soil export from the site generated from construction of the proposed Project would be disposed of at the Soil Safe of California Facility, located approximately 80 miles from the Project site in the City of Adelanto. As discussed above, the Soil Safe of California Facility has a maximum daily capacity of 5,000 tons and had a maximum daily intake of 1,735.22 tons of waste per day. Thus, the facility had a remaining capacity of 3,264.78 tons per day.

The Project includes the export and disposal of 25,000 cubic yards (CY) (or approximately 37,500 tons) of contaminated soils during construction of the proposed Project. The grading phase is estimated to last 100 days to adhere to the contaminated export quantities as included in the CalEEMod. As such, approximately 375 tons of contaminated waste would be exported and disposed of daily at the Soil Safe of California Facility. Thus, contaminated soil from the Project site during construction would result in approximately 11.5 percent of the Adelanto Soil Safe of California remaining daily capacity. Therefore, the facility would be able to accommodate the contaminated soil waste during construction of the proposed Project. In addition, the proposed Project would produce construction waste in the form of packaging and discarded materials that would be removed from the site. Utilizing a construction waste factor of 3.89 pounds per square foot (EPA, 1998), construction of the proposed Project would generate approximately 1,137 tons of waste. The 2022 California Green Building Standards Code requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste. Thus, construction activities would generate approximately 739 tons of solid waste to be disposed of at the landfill. As described in Section 3, *Project Description*, construction activities would occur over an 18-month period. This equates to approximately .02 tons of debris per day (excluding landfill closure days). As discussed previously, solid waste generated by the Project would be disposed of at the Savage Canyon Landfill which is permitted to accept 3,350 tons per day of solid waste. In 2023, the average tonnage received was 270 tons per day (CalRecycle, 2023). Thus, the facility had a remaining capacity of 3,071 tons per day. Therefore, the Savage Canyon Landfill as well as the Frank Bowerman and Sunshine Canyon Landfills would be able to accommodate the addition of .02 tons of debris per day during construction. Thus, the proposed Project would be served by a facility with sufficient capacity to accommodate the Project's additional tonnage of waste per day during construction. Impacts related to landfill capacity from construction would be less than significant.

Operation

The Project would include operation of approximately 584,678 SF of warehousing, inclusive of 5,000 SF of office space within each building. The *Air Quality, Energy, and Greenhouse Gas Impact Analysis* prepared for the Project and included as Appendix B, uses a default CalEEMod operational solid waste generation factor is 0.94 tons per 1,000 SF per year for industrial uses and 0.93 tons per 1,000 SF per year for general office uses. For a conservative analysis, the highest generation factor of 0.94 per 1,000 SF is assumed; thus operation of the Project would generate approximately 550 tons of solid waste per year, at least 75 percent of which is required by California law to be recycled, which would reduce the volume of landfilled solid waste to approximately 138 tons per year, or 0.38 tons per day.

As discussed above, solid waste generated by operation of the proposed Project would be disposed of at the Savage Canyon Landfill which is permitted to accept 3,350 tons per day of solid waste. In 2023, the average tonnage received was approximately 270 tons per day and a remaining capacity of 3,071 tons per day (CalRecycle, 2024). The Project's estimated solid waste from operations of approximately 138 tons

per year, or approximately 0.38 tons per day), would represent less than one percent of Savage Canyon Landfill's daily remaining capacity. Similarly, the Project would represent less than one percent of the Frank Bowerman and Sunshine Canyon Landfills' remaining capacity. Thus, the proposed Project would be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs and the Project would not impair the attainment of solid waste reduction goals. Impacts related to landfill capacity from operation would be less than significant.

IMPACT UTIL-7: THE PROJECT WOULD COMPLY WITH FEDERAL, STATE, AND LOCAL MANAGEMENT AND REDUCTION STATUTES AND REGULATIONS RELATED TO SOLID WASTE.

No Impact. The proposed Project would result in new development that would generate solid waste. All solid waste-generating activities within the County are subject to the requirements set forth in the California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste. Implementation of the proposed Project would be consistent with all state regulations, as ensured through the County's development permitting process. Therefore, the proposed Project would comply with all solid waste statute and regulations; and impacts would not occur.

5.11.5.6 Solid Waste Services Cumulative Impacts

The geographic scope of the cumulative analysis for landfill capacity is the service area for the Savage Canyon Landfill which serves the Project area. The projections of future landfill capacity based on the entire projected waste stream going to these landfill is used for cumulative impact analysis. The Savage Canyon Landfill has a maximum permitted capacity of 3,350 tons per day and as of 2023 had an average disposal of 237 tons per day (CalRecycle, 2024). Thus, the facility had an additional capacity of 3,113 tons per day. The Frank Bowerman Landfill is permitted to accept 11,500 tons per day of solid waste and received approximately 8,710.78 tons per day. Thus, the facility had a remaining capacity of 2,789 tons per day (CalRecycle, 2024). The Sunshine Canyon Landfill is permitted to accept 12,100 tons per day of solid waste and received a total of 2,358,927.59 tons which results in an average of 6,463 tons per day. Thus, the facility had a remaining capacity of 5,637 tons per day (CalRecycle, 2024). The construction and operation of the Project would represent a small percentage of Savage Canyon Landfill as well as the Frank Bowerman and Sunshine Canyon Landfills' daily remaining capacity. Therefore, the landfill would have sufficient capacity to serve the Project and the increase in solid waste from full buildout of the Project. Cumulative impacts would be less than significant.

5.11.5.7 Solid Waste Services Existing Regulations and Plans, Programs, or Policies

Existing Regulations

The following existing regulations would reduce potential impacts related to solid waste:

- Assembly Bill 347 (Chapter 476, Statutes of 2011)
- California Green Building Standards Code

Plans, Programs, or Policies

None.

5.11.5.8 Solid Waste Services Level of Significance Before Mitigation

Impacts UT-6 and UT-7 would be less than significant.

5.11.5.9 Solid Waste Services Mitigation Measures

No mitigation measures are required.

5.11.5.10 Solid Waste Services Level of Significance After Mitigation

No significant unavoidable adverse impacts related to solid waste would occur.

5.11.6 ELECTRIC POWER, NATURAL GAS, AND TELECOMMUNICATIONS

5.11.6.1 Electric Power, Natural Gas, and Telecommunications Regulatory Setting

State Regulations

Title 24 Energy Efficiency Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24 Part 6: The California Energy Code is updated every three years. The most recent update is the 2022 California Energy Code Standards that became effective January 1, 2023. The 2022 California Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards, among other requirements.

California Code of Regulations (CCR) Title 24 Part 11: The California Green Building Standards (CALGreen) is updated on a regular basis. The 2022 CALGreen standards that reduce GHG emissions and are applicable to the proposed Project include, but are not limited to, the following:

- **Short-term bicycle parking.** If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- **Long-term bicycle parking.** For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- **Designated parking for clean air vehicles.** In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).
- **EV charging stations.** New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106.5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty electric vehicle supply equipment for warehouses, grocery stores, and retail stores.
- **Outdoor light pollution reduction.** Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8).

- **Construction waste management.** Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1, 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- **Excavated soil and land clearing debris.** 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reuse or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- **Recycling by Occupants.** Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- **Water conserving plumbing fixtures and fittings.** Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
 - **Water Closets.** The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
 - **Urinals.** The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
 - **Showerheads.** Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
 - **Faucets and fountains.** Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- **Outdoor potable water uses in landscaped areas.** Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELo), whichever is more stringent (5.304.1).
- **Water meters.** Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 SF or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).
- **Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 SF.** Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 SF requiring a building or landscape permit (5.304.3).
- **Commissioning.** For new buildings 10,000 SF and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

Local and Regional Regulations

City of Santa Fe Springs General Plan

The Santa Fe Springs includes the following policies that are applicable to the proposed Project:

- Policy LU-3.8 Green Industrial Operations.** Encourage industrial businesses to utilize green building strategies, green vehicle fleets, energy-efficient equipment, and support renewable energy systems.
- Policy COS-8.1 Efficiency of Existing Buildings.** Improve energy efficiency of existing and new buildings, such as adding energy efficient appliances and fixtures, improvements to windows, reflective shingles, roof and wall insulations, and other green building strategies.
- Policy COS-8.3 Energy Efficiency Strategies.** Encourage energy-efficiency strategies of all new projects (public and private), including appropriate structure orientation and site design, passive solar approaches, the use of shade trees to maximize cooling, and to reduce fossil fuel consumption for heating and cooling.
- Policy COS-8.4 Renewable Energy Industrial Facilities.** Promote the use of renewable energy and/or solar energy for large industrial operations on building rooftops or on large properties and support solar-ready buildings for large industrial building and warehouses.
- Policy EJ-1.2 Truck Idling Restrictions.** Designate acceptable and unacceptable areas for freight trucking and diesel truck idling to limit impacts on disadvantaged communities already overburdened by air pollution.
- Policy S-5.7 Passive Solar Design.** Encourage passive solar design for new development and community facilities, including cool roofs, architectural features that cool interiors, shade shelter areas, shaded playgrounds, and bus shelters canopies.

5.11.6.2 Electric Power, Natural Gas, and Telecommunications Environmental Setting

Electricity

Electricity is provided to the Project area by Southern California Edison (SCE). SCE provides electric power to more than 15 million persons within its 50,000 square mile service area. According to SCE's 2021 Power Content Label Mix, SCE derives electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. Existing electrical utilities near the Project site exist near the northern property line.

Natural Gas

The Southern California Gas Company (SoCalGas) is the natural gas service provider for the Project site. SoCalGas provides natural gas to approximately 21.8 million people in a 24,000-square-mile service area throughout Central and Southern California, from Visalia to the Mexican border. According to the California Energy Commission (CEC), total natural gas consumption in the SoCalGas service area in 2021 was 6,755 million therms (2,308 million therms for the residential sector). Total natural gas consumption in Los Angeles County in 2021 was 2,880 million therms (2,880,994,891 therms) (California Energy Commission, 2022).

Natural gas lines near the Project site exist within Hawkins Street, west of the Project site. The proposed Project does not include connections to natural gas, and natural gas would not be used in operations of the proposed Project.

Telecommunications

Telecommunications in the City of Santa Fe Springs are offered by a variety of companies including Time Warner, Charter Spectrum, AT&T, and Verizon.

5.11.6.3 Electric Power, Natural Gas, and Telecommunications Thresholds of Significance

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

Utilities-8 Require or result in the relocation or construction of a new or expanded electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects.

5.11.6.4 Electric Power, Natural Gas, and Telecommunications Methodology

The evaluation of utilities identifies if utility demand from the Project would be accommodated via existing utility infrastructure available to the proposed Project. The evaluation identifies if expansions would be required to serve the proposed development, and if those expansions have the potential to result in an environmental impact.

5.11.6.5 Electric Power, Natural Gas, and Telecommunications Environmental Impacts

IMPACT UTILITIES-8: THE PROJECT WOULD NOT REQUIRE OR RESULT IN THE RELOCATION OR CONSTRUCTION OF A NEW OR EXPANDED ELECTRIC POWER, NATURAL GAS, OR TELECOMMUNICATIONS FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS.

Less than Significant Impact. Implementation of the proposed Project would generate demand for electricity, communication systems, street lighting, and maintenance of public facilities.

Electricity would be provided to the Project by Southern California Edison (SCE). Adequate commercial electricity supplies are presently available to meet the incremental increase in demand attributed to the Project. Provision of electricity to the Project site is not anticipated to require or result in the construction of new facilities or the expansion of existing facilities, the construction or relocation of which would cause significant environmental impacts to electricity. Furthermore, the Project buildings would be solar ready in compliance with current Title 24 requirements, which would allow for the future installation of rooftop solar. As such, Impacts would be less than significant.

The proposed Project would not connect to existing natural gas infrastructure. As such, the proposed Project is not anticipated to require or result in the construction of new gas facilities or the expansion of existing facilities, and impacts would be less than significant.

Communication systems for the Project would be provided by existing private companies that currently serve the City, including Time Warner, Charter Spectrum, AT&T, and Verizon. Frontier Communications. These existing communications providers are private companies that provide connection to the communication system on an as-needed basis. As such, the proposed Project is not anticipated to require or result in the construction of new communications facilities or the expansion of existing facilities. Impacts would be less than significant.

The Project Applicant would be responsible for coordinating with each utility company to ensure utility improvements occur according to standard construction and operation procedures administered by the California Public Utilities Commission. Excavation would be required to install electric and communication lines that would connect to existing infrastructure near the northern property line. Impacts associated with installation of utility infrastructure and connection to existing infrastructure have been addressed throughout

this Draft EIR as part of evaluation of construction of the proposed Project and have been mitigated to a less-than-significant level, as similarly detailed in the Impact Utilities-1 discussion, previously. Therefore, potential impacts associated with utilities, including electricity, natural gas and communication systems would be less than significant.

5.11.6.6 Electric Power, Natural Gas, and Telecommunications Existing Regulations and Plans, Programs, or Policies

Existing Regulations

California Code of Regulations (CCR) Title 24 Part 6: The California Energy Code.

California Code of Regulations (CCR) Title 24 Part 11: The California Green Building Standards (CALGreen)

Plans, Programs, or Policies (PPPs)

None.

5.11.6.7 Electric Power, Natural Gas, and Telecommunications Project Design Features

None.

5.11.6.8 Electric Power, Natural Gas, and Telecommunications Level of Significance Before Mitigation

Impact Utilities-8 would be less than significant.

5.11.6.9 Electric Power, Natural Gas, and Telecommunications Mitigation Measures

No mitigation measures are required.

5.11.6.10 Electric Power, Natural Gas, and Telecommunications Level of Significance After Mitigation

No significant and unavoidable adverse impacts related to electric power, natural gas, or telecommunications would occur.

5.11.7 REFERENCES

- California Energy Commission. (2022). *Gas Consumption by County and Entity. Energy Report*.
<http://www.ecdms.energy.ca.gov/gasbyutil.aspx>
- CalRecycle. (2024a). Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility. Accessed:
<https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility>
- CalRecycle. (2024a). SWIS Facility/Site Activity Details for Savage Canyon Landfill (19-AH-0001).
<https://www2.calrecycle.ca.gov/SolidWaste/Site/Details/1399>
- CalRecycle. (2024b). SWIS Facility/Site Activity Details for Soil Safe of California, Inc. (36-AA-0422).
<https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/5721?siteID=4245>; and
<https://www2.calrecycle.ca.gov/SolidWaste/SiteInspection/Details/371584>
- CalRecycle. (2024). SWIS Facility/Site Summary Frank R. Bowerman Landfill (30-AB-0360). Retrieved from CalRecycle: <https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/2103>
- City of Santa Fe Springs. (2021). *Santa Fe Springs General Plan and Targeted Zoning Code Update Environmental Impact Report*. Retrieved from Re-Imagine Santa Fe Springs 2040 General Plan: <https://www.reimaginesantafesprings.org/documents#GP>
- City of Santa Fe Springs. (2021a). *Santa Fe Springs 2040 General Plan*. Retrieved from City of Santa Fe Springs: <https://www.reimaginesantafesprings.org/documents#GP>
- City of Santa Fe Springs. Blodgett Baylosis Environmental Planning. (2023). *Initial Study and Mitigated Negative Declaration, Rexford 13711 Freeway Development*. Retrieved September 3, 2024, from: <https://files.ceqanet.opr.ca.gov/2874991/attachment/FF8eMmnOxIjFDPWjF32E6Lptrbc9MBFf vTke5wiz6osR1G-OcGkPLGKHjk53vJ8Le1U5KePaCMHBxu0>
- EPD Solutions. (2024). *Air Quality, Energy, and GHG Impact Analysis. (Appendix B)*.
- Huitt Zoliars. (2024, July). *Low Impact Development (LID) Plan for Santa Fe Springs Industrial. (Appendix F)*
- Los Angeles County Sanitation Districts (LACSD). (n.d.). Retrieved September 2, 2024, from: *Who We Are and What We Do For You*. <https://www.lacsd.org/services/wastewater-programs-permits/wastewater-revenue-program/who-we-are-what-we-do-for-you>
- Los Angeles County Sanitation Districts (LACSD). (2021). *Wastewater Revenue Program Report*.
<https://www.lacsd.org/home/showpublisheddocument/2502/637643594523170000>

6. Other CEQA Considerations

6.1 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS

State CEQA Guidelines Section 15126.2(c) requires an EIR to describe “any significant impacts, including those which can be mitigated but not reduced to a level of insignificance.” As described in detail in Section 5.0, *Environmental Impact Analysis*, of this Draft EIR, implementation of the Project would result in one significant and unavoidable impact under Transportation that cannot be reduced to a level below significance after implementation of Project design features; regulatory requirements; plans, programs, policies; and feasible mitigation measures. The Project would not result in any additional significant and unavoidable impacts, all other impacts would be less than significant or less than significant with mitigation.

6.1.1 Transportation

Impact TRA-2: Conflict or inconsistency with CEQA Guidelines § 15064.3, Subdivision (B).

The proposed Project would have a significant impact on home-based work (HBW) VMT per employee when compared to baseline conditions. The projected HBW VMT per employee for the Project would be 26.5 in 2024, which is 44.9 percent above the threshold of 18.3 VMT per employee. Therefore, the Project would result in a significant project level and cumulative impact to VMT. With compliance with existing rules and implementation of CAPCOA measures T-5 through T-11 that are included as Mitigation Measure TRA-1, the HBW VMT per employee of the Project would be reduced by 23.8 percent. Despite this reduction, the Project VMT would continue to exceed both the baseline and cumulative thresholds. Therefore, the Project VMT impact would be significant and unavoidable.

6.2 GROWTH INDUCEMENT

State CEQA Guidelines Section 15126.2(e), Growth Inducing Impact of the Proposed Project, requires that an EIR “discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.” The CEQA Guidelines also indicate that it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. In general terms, a project may foster spatial, economic, or population growth in a geographic area, if it meets any one of the following criteria:

1. Directly or indirectly foster economic or population growth, or the construction of additional housing, in the surrounding environment;
2. Remove obstacles to population growth;
3. Require the construction of new or expanded facilities that could cause significant environmental effects; or
4. Encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

1. Does the Project directly or indirectly foster economic or population growth or the construction of additional housing?

Growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population in excess of what is assumed in master plans, land use plans, or in projections made by regional planning agencies, such as SCAG. The Project would contribute to the economic growth and could contribute to population growth in the City of Santa Fe Springs and the surrounding areas through the generation of

jobs. As described in the Initial Study, included as Appendix A of this DEIR, the proposed Project does not involve construction of any new residential uses and would not contribute to a direct increase in the City's population. However, the proposed Project may indirectly contribute to population growth within the City by creating jobs both during construction and operation. The Project would require the need for approximately 385 employees, according to employment generation rates from the Southern California Association of Governments (SCAG) which estimate operation of industrial warehouse uses require one employee for every 1,518 SF of warehouse space (Southern California Association of Governments, 2001).

According to SCAG's 2024 RTP/SCS population and household growth forecast for Santa Fe Springs, between 2019 and 2050, SCAG anticipates an employment increase of 2,300 additional jobs (from 57,200 to 59,500), yielding a 4.02 percent growth rate (Southern California Association of Governments, 2024). SCAG regional growth forecasts are based upon, among other things, land uses designated in land use plans. As such, a project that is consistent with the land use designated in a General or Specific Plan would be consistent with SCAG's growth projections. The proposed Project is consistent with the site's existing land use and zoning designations therefore the projected increases in employment resulting from the Project are within SCAG's 2024 RTP/SCS projected increases. Thus, Project-related growth would not be unexpected or constitute substantial unplanned growth.

The proposed Project may cause an indirect economic growth as it would generate revenue to the City through taxes generated by the development. Additionally, employees (short-term construction and long-term operational employees) from the Project site would purchase goods and services in the region, but any secondary increase in employment growth associated with meeting these incremental demands would be marginal, as these goods and services could be accommodated by existing providers. The Project is highly unlikely to result in any new or additional physical impacts to the environment based on the amount of existing and planned future commercial and retail services, which can serve Project employees, available in areas near the Project site.

In addition, the proposed Project would create jobs, a majority of which would likely be filled by residents of Santa Fe Springs and the surrounding Los Angeles County areas. The employees that would fill these roles are anticipated to come from the region, as the unemployment rate of the City of Santa Fe Springs was approximately 8 percent (EDD, 2023). Due to these levels of unemployment, it is anticipated that new employees at the Project site would already reside within commuting distance. Employees would live in housing either already built or planned for development in the City and the surrounding Los Angeles County areas.

Because it is anticipated that most of the future employees from implementation of the Project would already be living in the region, the Project's introduction of employment opportunities would not induce substantial growth in the area and cause the need for additional housing. Thus, the Project would not result in the influx of new labor to serve the increased economic activities that would result from implementation of the Project.

2. Does the Project remove obstacles to population growth?

The elimination of a physical obstacle to growth is considered to be a growth inducing impact. A physical obstacle to growth typically involves the lack of public service infrastructure. The Project would induce growth if it would provide public services or infrastructure with excess capacity to serve lands that would otherwise not be developable.

As described in Section 3.0, *Project Description*, the Project proposes installation of new potable water lines, and sewer lines on the site that would connect to surrounding, existing infrastructure in order to accommodate the demands of the Project. The Project would also extend the proposed 8-inch sewer main approximately 250 feet west of the Project site and connect to the existing 8-inch sewer main in Hawkins Street. However, the proposed infrastructure improvements have been designed to serve only the demands of the Project.

Therefore, the Project would not expand sewer services into unplanned areas and would not result in significant growth inducing impacts.

The Project does not propose roadway extensions into new undeveloped areas that would allow for additional growth and development.

3. Does the proposed Project require the construction of new or expanded facilities that could cause significant environmental effects?

Growth induced by a project is considered a significant impact if it directly or indirectly affects the ability of agencies to provide needed public services that requires the construction of new public service facilities, or if it can be demonstrated that the potential growth significantly affects the environment in some other way. The proposed Project would slightly increase the demand for fire protection and emergency response and police protection. However, as described in the Initial Study, included as Appendix A of this DEIR, the Project would not require development of additional facilities or expansion of existing facilities to maintain existing levels of service for public services. Based on service ratios and build out projections, the Project would not create a demand for services beyond the capacity of existing facilities. Therefore, an indirect growth inducing impact as a result of expanded or new public facilities that could support other development in addition to the proposed Project would not occur. The proposed Project would not have significant growth inducing consequences that would require the need to expand public services to maintain desired levels of service.

4. Does the Project encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively?

Surrounding Project areas are already developed with commercial and industrial uses. Therefore, the Project would not spur increased development in surrounding areas. Additionally, the proposed infrastructure is only sized to serve the Project and would not have capacity to serve additional development projects in the area. The Project does not propose changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, or fire codes). The proposed Project would comply with all applicable City plans, policies, and ordinances. In addition, Project features and mitigation measures have been identified within this EIR to ensure that the Project minimizes environmental impacts. The proposed Project would not involve any precedent-setting action that could encourage and facilitate other activities that significantly affect the environment.

6.3 SIGNIFICANT IRREVERSIBLE EFFECTS

State CEQA Guidelines require the EIR to consider whether "uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely.... Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified." (CEQA Guidelines Section 15126.2(d)). "Nonrenewable resource" refers to the physical features of the natural environment, such as land, waterways, mineral resources, etc. These irreversible environmental changes may include current or future uses of non-renewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or

- The proposed irretrievable commitments of nonrenewable resources is not justified (e.g., the project involves the wasteful use of energy).

The Project would result in or contribute to the following irreversible environmental changes:

- Lands in the Project site would be committed to warehousing and industrial uses once the proposed buildings are constructed. Secondary effects associated with this irreversible commitment of land resources include:
 - Increased traffic on area roadways (see Section 5.9, *Transportation*).
 - Emissions of air pollutants and greenhouse gas emissions associated with Project construction and operation (see Section 5.1, *Air Quality*, and Section 5.4, *Greenhouse Gas Emissions*).
 - Consumption of non-renewable energy associated with construction and operation of the proposed Project due to the use of automobiles, trucks, lighting, heating, and cooling systems, appliances, etc. (see Section 5.2, *Energy*).
 - Increased ambient noise associated with an increase in activities and traffic from the Project (see Section 5.8, *Noise*).
- Construction of the proposed Project as described in Section 3, *Project Description*, would require the use of energy produced from non-renewable resources and construction materials.

In regard to energy usage from the Project, as demonstrated in the analysis contained in Section 5.2, *Energy*, the proposed Project would not involve wasteful or unjustifiable use of non-renewable resources, and conservation efforts would be enforced during construction and operation of proposed development. The proposed development would incorporate energy-conserving Project design features, including those required by the California Building Code, California Energy Code Title 24, which specify green building standards for new developments. In addition, as listed in Section 5.4, *Greenhouse Gas Emissions*, the proposed Project would include sustainability features in line with Title 24 requirements that result in additional energy-efficiency. Project specific information related to energy consumption is provided in Section 5.2, *Energy*, of this EIR.

6.4 REFERENCES

EDD. (2023). *Unemployment Rate and Labor Force*. Retrieved from State of California Employment Development Department: <https://labormarketinfo.edd.ca.gov/data/unemployment-and-labor-force.html>

EPD Solutions, Inc. (2024). Northwest Corner of Telegraph and Santa Fe Springs. Initial Study. (**Appendix A**)

Southern California Association of Governments. (2001, October). *Employment Density Study Summary Report*. Retrieved from <https://www.mwcog.org/file.aspx?A=QTTITR24POOOUIw5mPNzK8F4d8djdJe4LF9Exj6IXOU%3D>

Southern California Association of Governments. (2024, April). *Connect SoCal RTP SCS Demographics and Growth Forecast*. Retrieved from Southern California Association of Governments: <https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839>

7. Effects Found Not Significant

CEQA Guidelines Section 15126.2(a) states that “[a]n EIR shall identify and focus on the significant effects on the environment.” During the preparation of this EIR, the Project was determined to have no potential to result in significant impacts under eleven environmental issue areas: aesthetics, agriculture and forestry resources, biological resources, cultural resources, geology and soils, hydrology, land use and planning, population and housing, public services, recreation, and wildfire. Therefore, these issue areas were not required to be analyzed in detail in EIR Section 5.0, *Environmental Impact Analysis*.

CEQA Guidelines Section 15128 requires that an EIR contain a statement briefly indicating the reasons that various possible effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. As allowed by CEQA Guidelines Section 15128, statements related to the above listed topic areas are presented below.

7.1 AESTHETICS

Scenic Vista

The Project site is within an urbanized area in the City of Santa Fe Springs where the surrounding area is primarily industrial uses. Existing public vantage points exist along roadways that surround the Project site, which do not contain expansive scenic vistas. The Project would comply with setback standards as required by Section 155.244, *Property Development Standards*, of the City Municipal Code. Therefore, the proposed Project would not encroach upon views of any scenic vistas for pedestrians and motorists from public vantage points on the nearest roadways including Telegraph Road and Santa Fe Springs Road. Thus, impacts would be less than significant.

Scenic Highway

According to the California Department of Transportation (Caltrans) Scenic Highway Map, there are no officially designated State scenic highways near the Project site; the closest one is Route 55 which turns into State Route (SR) 91 southeast of Santa Fe Springs, approximately 15.15 miles from the Project site (California Department of Transportation, 2024). Therefore, the Project site would not damage scenic resources such as rock outcroppings, historic buildings, or trees within a State scenic highway.

Conflict with Regulations Governing Scenic Quality

The Project is in an urbanized area and has an existing General Plan land use designation of Industrial and is zoned as M-2 (Heavy Manufacturing). The proposed light industrial warehouse Project is a permitted use under the Industrial land use and M-2 zone. The proposed Project would include a new 8-foot-high tube steel fence along the southwestern, western, northern, and northeastern property line, which would connect to existing tube steel fence along the southeastern property line. The truck court would also be secured by a 14-foot-high concrete screen wall with two 10-foot-high tube steel sliding gates on the western side and one 10-foot-high tube steel sliding gate on the eastern side. The proposed fencing would be consistent with the City’s development standards, as ensured during the City’s plan check. The proposed Project would be consistent with the M-2 zone’s development standards including FAR, setbacks, height, and fencing pursuant to Section 155.244, *Property Development Standards* of the Santa Fe Springs Municipal Code. In addition, the Project would include landscaping along the perimeter of the site as required by existing standards. Therefore, the Project would not conflict with applicable zoning regulations and impacts would be less than significant.

Light and Glare

The Project site is heavily disturbed and contains one single-story office building and a canopy structure that is used to cover construction equipment on the western edge of the site. The remainder of the site consists of undeveloped land utilized for oil and gas extraction that generates limited light and glare. The Project would introduce new sources of light from new building security lighting, streetlights within the Project area, interior lights shining through building windows, parking lot lighting, and headlights from nighttime vehicular trips generated from the Project. Lighting would also be used during the construction phase for site security. Thus, the Project would increase lighting and glare compared to the existing condition. However, the Project would be subject to Sections 155.432 and 155.496 of the City Municipal Code, which prohibits light and glare to be transmitted or reflected in concentrated quantities that would be detrimental or harmful to the use of surrounding properties or streets, which would be verified by the City as part of the development permitting process. Thus, the proposed Project would have a less-than-significant impact related to light and glare.

7.2 AGRICULTURE AND FOREST RESOURCES

Farmland

Per the California Department of Conservation (CDOC) Farmland Mapping and Monitoring Program (FMMP) Map, the Project site is designated as “Urban and Built-Up Land” by the California Department of Conservation’s Important Farmland Finder (California Department of Conservation, 2022a). Additionally, the Project site is currently zoned as M-2, which does not allow for agricultural uses. Implementation of the proposed Project would therefore not involve the conversion of any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to urban uses. As a result, no impact would occur.

Williamson Act Contract

The Project site is zoned M-2 (Heavy Manufacturing), which does not provide for agricultural uses, and no agriculture uses exist adjacent to the site that would be affected by the Project’s implementation. In addition, according to the California Department of Conservation’s Williamson Act Enrollment Finder, the Project site is not under a Williamson Act Contract (California Department of Conservation, 2022b). Therefore, development of the proposed Project would not conflict with an existing Williamson Act contract or with existing zoning for agricultural use and no impact would occur.

Loss of Forest Land/Timberland and Forest Land/Timberland Zoning

The Project site is designated as M-2 (Heavy Manufacturing) and is currently used for oil well activities. The site does contain some ornamental trees and shrubs that do not qualify as forest land, and the site is not zoned for forest land, timberland, or Timberland Preserve Zone (TPZ). Additionally, there are no forest lands, timberland, or zoned Timberland Production in proximity to the Project site that would result in the loss of forest land or timberland (City of Santa Fe Springs, 2021c). Therefore, the proposed Project would not result in impacts to forest land, timberland, or TPZ.

Other Changes in Existing Environment

The Project site is located in an urban environment that contains roadways, industrial uses, and oil well facilities. There are no agricultural activities on or adjacent to the Project site. Additionally, neither the Project site nor the surrounding area are designated as forest land or farmland. Thus, the proposed Project would not convert existing farmland to nonagricultural uses, nor convert forest land to non-forest uses. Therefore,

the Project would not result in impacts to other changes in the existing environment that would result in the conversion of forest land or farmland.

7.3 BIOLOGICAL RESOURCES

Special Status Species

Biological resources on the Project site were evaluated in the General Biological Assessment (GBA) completed by Hernandez Environmental Services (HES) in March 2024, included in Appendix A of the Initial Study for the proposed Project. According to the GBA, a total of 33 sensitive plant species were found to have the potential to occur on or within the vicinity of the Project site. Of those 33 sensitive plant species, a total of 13 of the reviewed sensitive plant species are listed as State and/or federal Threatened, Endangered, or Candidate species; or have a rare plant ranking of 1B.1 on the CNPS Rare Plant Inventory (Hernandez Environmental Services, 2024). However, no sensitive plant species were found to be present on the Project site nor to have suitable habitat present on the Project site. Therefore, implementation of the Project would have a less-than-significant impact on sensitive plant species. In addition, out of a total of 48 special-status wildlife species, 17 are listed as State and/or federal Threatened, Endangered, or Candidate. However, the field survey did not identify suitable habitat for any of the animal species, including any suitable habitat for burrowing owl (Hernandez Environmental Services, 2024). Therefore, implementation of the Project would have a less than significant impact on sensitive wildlife species.

Riparian Habitat and Sensitive Natural Communities

The Project site does not contain or support any streams, drainages, or riparian habitats (Hernandez Environmental Services, 2024). Thus, the Project would have no impact to riparian habitat or other sensitive natural communities identified in local or regional plans.

Wetlands

The Project site does not contain natural wetlands (Hernandez Environmental Services, 2024). Therefore, the Project would not result in impacts to wetlands.

Wildlife Movement Corridor and Wildlife Nursery Sites

The Project site does not support conditions for migratory wildlife corridors or linkages (Hernandez Environmental Services, 2024). There are no rivers, creeks, or open drainages near the site that could function as a wildlife corridor. Thus, implementation of the Project would not result in impacts related to wildlife movement or wildlife corridors.

As discussed in the Initial Study prepared for the proposed Project (Appendix A), the Project site contains shrubs and some trees that could be used for nesting by common bird species that are protected by the federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code Sections 3503.5, 3511, and 3515 during the avian nesting and breeding season that occurs between February 1 and September 15. The provisions of the MBTA prohibit disturbing or destroying active nests. Therefore, implementation of the MBTA, included as PPP BIO-, is included to require that if commencement of vegetation clearing occurs between February 1 and September 15, a qualified biologist shall conduct a nesting bird survey no more than 3 days prior to commencement of activities to confirm the absence of nesting birds. With implementation of PPP BIO-1, potential impacts to nesting birds would be less than significant.

Biological Resource Policies

The Project would be required to comply with the City of Santa Fe Springs Tree Ordinance, as listed in Title IX, Chapter 95, Section 130-140 of the City Municipal Code which states that trees, shrubs or plants along any street shall not be interfered with without a permit from the City. However, the Project site would not impact any trees on an existing City roadway. The Project site is surrounded by other existing uses and does not directly border a public roadway including Santa Fe Springs Road and Telegraph Road; therefore, the Project would not be subject to the City of Santa Fe Springs' tree ordinance. Implementation of the proposed Project would not conflict with any local policies or ordinances protecting biological resources; therefore, the Project would have a less-than-significant impact on local tree policies.

Adopted Habitat Conservation Plan

The Project site is located in an urban area and is not within the boundary of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP) or other approved local, regional, or State habitat conservation plan. As such, the proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan and no impacts would occur.

Plans, Programs, or Policies PPP BIO-1 Migratory Bird Treaty Act. Vegetation removal should occur outside of the nesting bird season (generally between February 1 and September 15). If vegetation removal is required during the nesting bird season, the applicant must conduct take avoidance surveys for nesting birds prior to initiating vegetation removal/clearing. Surveys will be conducted by a qualified biologist(s) within three days of vegetation removal. If active nests are observed, a qualified biologist will determine appropriate minimum disturbance buffers and other adaptive mitigation techniques (e.g., biological monitoring of active nests during construction-related activities, staggered schedules, etc.) to ensure that impacts to nesting birds are avoided until the nest is no longer active. At a minimum, construction activities will stay outside of a 200-foot buffer around the active nests. The approved buffer zone shall be marked in the field with construction fencing and shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests.

7.4 CULTURAL RESOURCES

Historical Resources

The Project site is heavily disturbed and contains one, single-story office building on the western edge of the site and a canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of land utilized for oil wells. According to the Cultural Resources Study prepared by BFSa (Appendix C), none of the features identified on the Project site appear to be older than 50 years and the six oil pump jacks do not correspond with the historic extraction of oil on the property. As such, there are no existing historical resources within the Project site or within the immediate vicinity of the Project, and impacts related to historic resources would not occur from implementation of the Project.

Archaeological Resources

The Project site is heavily disturbed from existing and historic oil well uses. Project construction would require excavation to depths of approximately 15 feet. As part of the Cultural Resources Study, an archaeological records search for the Project site and surrounding area was conducted which indicated that 35 previous

studies have been conducted within one mile of the Project site and 12 resources have been identified within a mile of the Project site. However, no resources have been recorded within the boundaries of the Project site or immediate vicinity. Additionally, a field survey was conducted on January 15, 2024, in which no cultural resources were identified within the Project site. Based upon the results of the cultural resources study and field survey as well as the previously disturbed state of the Project site, the potential to encounter unknown archeological resources was determined to be minimal (Appendix C).

However, in the event that any historic or prehistoric cultural resources are inadvertently discovered, all construction work in the immediate vicinity of the discovery shall stop and a qualified archaeologist shall be engaged to evaluate the discovery as described in MM CUL-1. With the implementation of MM CUL-1, impacts related to archaeological resources would be less than significant.

Human Remains

The Project site has been heavily disturbed and has not been previously used as a cemetery. It is not anticipated that implementation of the proposed Project would result in the disturbance of human remains. Existing regulation under the California Health and Safety Code, included as PPP CUL-1, outlines the procedures to undertake if human remains are found on the Project site. In the event of inadvertent discovery of human remains during Project construction, the State Health and Safety Code Section 7050.5 states that no further disturbance may occur in the vicinity of the body until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. Compliance with existing regulations would ensure impacts related to potential disturbance of human remains would be less than significant.

Plans, Programs, and Policies

PPP CUL-1 Human Remains. Should human remains be discovered during Project construction, the Project will be required to comply with State Health and Safety Code Section 7050.5, which states that no further disturbance may occur in the vicinity of the body until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine the identity of and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD must complete the inspection within 48 hours of notification by the NAHC.

Mitigation Measures

MM CUL-1 Inadvertent Discovery. In the event that potential archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the City or County List of Qualified Archaeologists has evaluated the find to determine whether the find constitutes a “unique archaeological resource,” as defined in Section 21083.2(g) of the California Public Resources Code. Any resources identified shall be treated in accordance with California Public Resources Code Section 21083.2(g). If the discovered resource(s) appears Native American in origin, a Native American Monitor shall be contacted to evaluate any potential tribal cultural resource(s) and shall have the opportunity to consult on appropriate treatment and curation of these resources. The discovery would also be reported to the City and the South Central Coastal Information Center (SCCIC). Prior to the issuance of any permits for ground-disturbing activities that include the excavation of soils (including as grading, excavation,

and trenching), the City shall ensure that all Project grading and construction plans and specifications include requirement to halt construction activity and contact an archaeologist as specified above.

7.5 GEOLOGY AND SOILS

Fault Rupture

The Project site is not located within an Alquist-Priolo Earthquake Fault zone (California Geological Survey, 2024). The closest Alquist-Priolo Earthquake Fault zones are the Elsinore fault zone, located approximately 5.5 miles northeast and the East Montebello Fault Zone, located approximately 7 miles north from the Project site, respectively. Due to the distance of the Project site from the closest fault zone, there is no potential for the Project to be subject to rupture of a known earthquake fault. Impacts related to a fault zone would not occur from implementation of the proposed Project.

Ground Shaking

Due to the Project's location within a seismically active region of Southern California, moderate to strong ground shaking can be expected at the Project site. However, structures built in the City are required to be built in compliance with the California Building Code (CBC) (California Code of Regulations, Title 24, Part 2) which provides provisions for earthquake safety based on factors including building occupancy type, the types of soils onsite, and the probable strength of ground motion. Compliance with the CBC would require the incorporation of: (1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; (2) proper building footings and foundations; and (3) construction of the building structure so that it would withstand the effects of strong ground shaking.

Pursuant to Title 15, Chapter 150, *Building Regulations*, of the Santa Fe Springs Municipal Code, the Project would incorporate the design recommendations included in its geotechnical report, which will be subject to review and approval by City staff prior to issuance of a grading permit. Compliance with the CBC as verified by the City's review process and included as a condition of approval, would reduce impacts related to strong seismic ground shaking to a less-than-significant level.

Liquefaction

According to Figure S-1, *Seismic Hazards*, of the Santa Fe Springs General Plan Safety Element, the Project site is not identified as being within a liquefaction zone (City of Santa Fe Springs, 2021b). Additionally, compliance with the CBC, ensured through the City's plan check process, would reduce impacts related to seismic-related ground failure to a less than significant level. Therefore, impacts related to seismic-related ground failure would be less than significant.

Landslides

The Project site is located in a seismically active region subject to strong ground shaking. However, the Project site is located in a flat area that does not contain nor is adjacent to large slopes, and the Project would not generate large slopes. As a result, implementation of the Project would not expose people or structures to substantial adverse effects involving landslides, and impacts related to landslides would not occur.

Soil Erosion

Grading activities that would be required for the Project would expose and loosen topsoil, which could be eroded by wind or water. To reduce the potential for soil erosion and the loss of topsoil, construction activities

would require a Storm Water Pollution Permit (SWPPP), which is mandated by the National Pollution Discharge Elimination System (NPDES) General Construction Permit (included as PPP WQ-1 herein) and enforced by the Los Angeles Regional Water Quality Control Board. The SWPPP is required to address site-specific conditions related to specific grading and construction activities that could cause erosion and the loss of topsoil and provide erosion control best management practices (BMPs) to reduce or eliminate the erosion and loss of topsoil. Erosion control BMPs include use of silt fencing, fiber rolls, or gravel bags, stabilized construction entrance/exit, hydroseeding, etc. Compliance with State and federal requirements would ensure that the proposed Project would have a less than significant impact related to soil erosion or loss of topsoil.

Additionally, the proposed Project includes installation of landscaping adjacent to the proposed buildings and throughout the proposed parking areas. With this landscaping, areas of loose topsoil that could erode by wind or water would not exist upon operation of the proposed Project. Thus, with implementation of existing requirements, impacts related to substantial soil erosion or loss of topsoil would be less than significant.

On- or Offsite Landslide, Lateral Spreading, Subsidence, Liquefaction, or Collapse

As stated above, the Project site is not located in an area that is susceptible to landslides or liquefaction. In addition, due to the depth of groundwater and the low susceptibility to liquefaction, the potential for lateral spreading is considered low (LGC Geotechnical, 2024).

Localized or focal subsidence or settlement of the ground can occur as a result of an earthquake motion in an area where groundwater in basin is lowered. An onsite Geotechnical Investigation consisting of subsurface evaluation in the form of eight hollow-stem borings was conducted by LGC Geotechnical in February 2024. The depths of the borings ranged between 10 to 50 feet below existing grade and groundwater was not encountered to the maximum explored depth of approximately 51.5 feet below existing grade (LGC Geotechnical, 2024). In addition, the Project would not pump water from the Project area; however, slight subsidence is anticipated as a result of soil excavation and compaction. Thus, impacts related to subsidence would be less than significant.

As described previously, compliance with the requirements of the CBC and related recommendations in the Geotechnical Investigation related to compaction of soils and development of foundations is required as part of the building plan check and development permitting process, and would reduce potential impacts related to lateral spreading, liquefaction, subsidence, and ground collapse to a less-than-significant level.

Expansive Soils

The Geotechnical Investigation found that the onsite soils of the Project site consist of medium dense to very dense sands and silty sands and stiff to very stiff sandy silts and clays. Based on preliminary field investigation and laboratory testing, onsite soils possess a “very low” expansion potential (LGC Geotechnical, 2024). In addition, as described previously, compliance with the CBC would require specific engineering design recommendations be incorporated into grading plans and building specifications as a condition of construction permit approval to ensure that Project structures would withstand effects related to ground movement, including expansive soils. Therefore, impacts would be less than significant.

Alternative Waste Disposal Systems

The proposed Project would be served by the City’s sewer utilities and would not include the use of septic tanks or alternative wastewater disposal systems. Thus, implementation of the Project would not result in impacts related to alternative waste disposal systems.

Plans, Programs, and Policies

PPP WQ-1 NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Building and Safety Department evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resources Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

7.6 HYDROLOGY AND WATER QUALITY

Flood Hazard, Tsunami or Seiche Zones

According to FEMA FIRM Map 06037C1829F, the Project site is completely located in “Zone X,” which is an area of minimal flood hazard (FEMA, 2021). Thus, the proposed Project would not be located within a flood hazard zone and would result in a less-than-significant impact on flood hazard.

Tsunamis are large waves that occur in coastal areas; therefore, since the City is not located in a coastal area, no impacts due to tsunamis would occur. Additionally, the Project site does not contain and is not adjacent to any water bodies that could seiche. The nearest body of water is the San Gabriel River, approximately 1.5 miles to the west, which is not a contained body of water with seiche potential. Therefore, the Project would result in no impacts related to tsunamis and seiche zones.

7.7 LAND USE AND PLANNING

Divide Established Community/Conflict with Adopted Land Use Plan, Policy, or Regulation

Implementation of the proposed Project would not divide an established community. The Project site is used for oil well activities and contains one, single-story office building on the western edge of the property and a canopy structure to the northeast of the building used to cover construction equipment. The Project site is designated by the General Plan as Industrial and zoned as M-2. The proposed Project would be consistent with the existing land use designation and zone. The Project site’s surrounding areas are primarily industrial uses. Neither the land use nor zoning designations for the Project site allow for residential development. In addition, the proposed Project does not involve the development of roadways or other infrastructure that would divide a community. Therefore, the proposed Project would not have an impact on an established community and would not conflict with the existing General Plan and policies.

7.8 POPULATION AND HOUSING

Unplanned Population Growth

The Project would result in an increase in employment at the Project site that could lead to a potential population increase in the surrounding area. According to the Southern California Association of Governments (SCAG), the generation rate for employees required for operation of an industrial project is 1 employee for every 1,518 SF of industrial space (Southern California Association of Governments, 2001). As the Project

would build and operate two industrial warehouses totaling 584,678 SF, operation of the Project would require approximately 385 employees.

According to SCAG's 2024 RTP/SCS population and household growth forecast for Santa Fe Springs, between 2019 and 2050, SCAG anticipates an employment increase of 2,300 additional jobs (from 57,200 to 59,500), yielding a 4.02 percent growth rate (Southern California Association of Governments, 2024).

The proposed Project would generate the need for approximately 385 employees, which represents approximately 16.74 percent of the forecasted employment growth between 2019 and 2050 for the City. However, according to the Employment Development Department, as of March 2024, Santa Fe Spring's unemployment rate was approximately 8 percent (EDD, 2023). Thus, although the Project would generate additional long-term employment in the Project area, the new employment opportunities would also serve to decrease the City's unemployment rate. As such, the generation of new employees would be within the forecasted and planned growth of the City and the Project would result in a less-than-significant impact related to inducement of substantial unplanned population growth.

Displacement of People or Housing

The Project site is used for oil well activities and contains one, single-story office building and a canopy structure used to cover construction equipment. No residential structures exist on the Project site and no residences are planned for the site under the Industrial General Plan land use designation and the M-2 zoning. Therefore, no impacts would occur.

7.9 PUBLIC SERVICES

Fire Protection and Emergency Services

The City of Santa Fe Springs Department of Fire – Rescue provides fire protection and medical emergency services within the City. The closest fire station to the Project site is Station No. 4, located approximately 1.4 miles west of the Project site, at 11736 Telegraph Road, Santa Fe Springs, CA 90670. Construction and operation of the proposed Project would result in an increased number of employees in the Project area; however, as previously mentioned, the Project would not directly or indirectly induce substantial population growth in the City. In addition, the Project would include new fire prevention infrastructure pursuant to current code requirements. The City has adopted the California Fire Code (Title 24, Part 9 of the California Code of Regulations) in Section 93.01 of the City Municipal Code, which regulates new structures related to safety provisions, emergency planning, fire-resistant construction, fire protection system, and appropriate emergency access throughout the site. Since the site is already served by the fire department, and the Project would be constructed pursuant to existing California Fire Code regulations, the Project would not result in the need for new or physically altered fire department facilities that could cause significant environmental impacts. Therefore, the Project would result in less than significant impacts related to fire protection services.

Police Protection

The City of Whittier Police Department provides policing services for the City of Santa Fe Springs under contract. The Police Services Center is located at 11576 Telegraph Road, Santa Fe Springs, CA 90670, approximately 1.2 miles west of the Project site. The Police Department has a total of 35 sworn and 6 support personnel (City of Whittier, 2024). As discussed previously, the Project is not anticipated to directly or indirectly induce unplanned population growth in the City. Although the Project could potentially result in a slight incremental increase in calls for service to the Project site compared to existing conditions, this increase is expected to be nominal (as opposed to new residential or commercial/retail land uses, which do

result in greater increase in calls for service) and would not result in the need for new police protection facilities.

It is anticipated that the Project would be adequately served by existing Whittier Police Department facilities, equipment, and personnel. Therefore, impacts would be less than significant.

School Services

The proposed Project would develop a warehouse facility that would not directly generate students. As described previously, the Project is not anticipated to generate a new population, as the employees needed to operate the Project are anticipated to come from within the Project region and substantial in-migration of employees that could generate new students is not anticipated to occur. Thus, the Project would not generate the need for new or physically altered school facilities and impacts would be less than significant.

Additionally, pursuant to Government Code Section 65995 et seq., the need for additional school facilities is addressed through compliance with school impact fee assessment. SB 50 (Chapter 407 of Statutes of 1998) sets forth a State school facilities construction program that includes restrictions on a local jurisdiction's ability to condition a project on mitigation of a project's impacts on school facilities in excess of fees set forth in the Government Code. The Project would be required to contribute fees to the Little Lake City School District in accordance with the Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50), as included by PPP PS-1. Pursuant to Senate Bill 50, payment of school impact fees constitutes complete mitigation under CEQA for Project-related impacts to school services. Therefore, impacts would be less than significant.

Parks

The proposed Project would develop two new industrial warehouses and does not include development of park facilities. In addition, the proposed Project is not anticipated to result in an influx of new residents, as the employees needed to operate the proposed buildings are primarily anticipated to come from the unemployed labor force in the region. Thus, the proposed Project would not generate a substantial population that would require construction or expansion of park facilities, and impacts would be less than significant.

Other Public Facilities

The proposed Project involves construction and operation of two new warehouse buildings and would not provide new housing opportunities to the area. The proposed Project is not likely to create a significant increase in the use of other public facilities such as libraries, community centers, post offices or animal shelters. Therefore, impacts would be less than significant.

Plans, Programs, and Policies

PPP PS-1 School Fees. Prior to the issuance of either a certificate of occupancy or prior to building permit final inspection, the applicant shall provide payment of the appropriate fees set forth by the applicable school districts related to the funding of school facilities pursuant to Government Code Section 65995 et seq.

7.10 RECREATION

Deterioration of Parks or Recreational Facilities

Implementation of the proposed Project would not directly increase housing or population as the proposed Project does not propose any type of residential use or other land use which typically cause an increase in the demand for, and use of, existing neighborhood parks and other citywide recreational facilities. The closest park is Heritage Park, located approximately 0.5 mile from the Project site. Although the proposed Project would generate new employees that may occasionally increase the use of existing local, neighborhood, and regional parks, employees' use of parks would be limited and would therefore not result in accelerated deterioration to facilities such that the construction or expansion of recreational facilities would be necessary. As such, impacts would be less than significant.

Expansion of Recreational Facilities

The Project does not propose any residential facilities or other land use that would cause a direct increase in housing or the residential population that would require recreational facilities. The indirect increase in population as a result of new employment opportunities would not result in additional use of recreational facilities sufficient to cause deterioration such that the construction or expansion of recreational facilities would be necessary. Therefore, impacts would be less than significant.

7.11 WILDFIRE

Adopted Emergency Response Plan or Emergency Evacuation Plan

According to the California Department of Forestry and Fire Protection (CAL FIRE) Hazard Severity Zone Map, the Project is not within a State Responsibility Area (SRA), California Fire Hazard Severity Zone (FHSZ), or Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE, 2023). The proposed Project would provide adequate emergency access to the site via three ingress and egress driveways from Telegraph Road, Santa Fe Springs Road, and Hawkins Street. Telegraph Road and Santa Fe Springs Road are both designated as evacuation routes. Also, the proposed Project does not include any characteristics (e.g., permanent road closures or long-term blocking of road access) that would substantially impair or otherwise conflict with an emergency response plan or emergency evacuation plan. Further, the proposed Project would not obstruct or alter any transportation routes that could be used as evacuation routes during emergency events as the proposed Project would be required through the City's permitting process to implement appropriate measures to facilitate vehicle circulation, as included within construction permits. Thus, implementation of the Project through the City's permitting process would ensure existing regulations are adhered to and potential construction-related emergency access or evacuation impacts would be less than significant.

The proposed Project would also include a 26-foot-wide fire access road throughout the site. Project driveways and internal access would be consistent with the City's permitting procedures to meet the City's design standards, stated in the City of Santa Fe Springs Municipal Code Section 155.244, Property Development Standards to ensure adequate emergency access and evacuation. The proposed Project would also be required to provide fire suppression facilities (e.g., hydrants and sprinklers). The Office of the Fire Marshal and/or Engineering Department would review the development plans as part of the permitting procedures to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). Thus, the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

Exposure to Pollutant Concentrations from Wildfire

The Project is not within a VHFHSZ. Additionally, there are no areas within a VHFHSZ within the City of Santa Fe Springs. The Project site and adjacent areas are sparsely vegetated, urbanized, and do not contain other major factors that could exacerbate wildfire risks. The Project site is in a flat area that does not contain or is adjacent to large slopes, and the proposed Project would not generate large slopes. Implementation of the proposed Project would be required to adhere to the California Fire Code, as adopted by the Santa Fe Springs Fire Department, and Project plans would be reviewed by the City's Building Department during the permitting process to ensure that the Project meets fire protection requirements. The Project site does not include any slopes or prevailing winds that would exacerbate fire risks. Therefore, the Project would result in less-than-significant impacts related to exposure of people or structures to pollutant concentrations from wildfire.

Installation or Maintenance of Infrastructure Exacerbating Fire Risk

The Project site is not within a VHFHSZ. The Project does not include infrastructure that would exacerbate fire risk. Although the Project includes new driveways for access to the buildings within the Project site and the extension of Hawkins Street, the Project would be compliant with all applicable design standards and regulations. Additionally, although utility improvements, including domestic water and sewer are proposed as part of the Project, these utility improvements would be largely underground and would not exacerbate fire risk. Project design and implementation of utility improvements would be reviewed and approved by the City as part of the Project approval process to ensure the proposed Project is compliant with all applicable design standards and regulations. Therefore, impacts would be less than significant.

Exposure to Significant Risk as a result of Runoff, Post-fire Slope Instability or Drainage Changes

The Project is not within a VHFHSZ. In addition, the Project site is located in a flat area that does not contain or is adjacent to large slopes, and the Project would not generate large slopes. Thus, the project would not result in risks related to wildfires or risks related to downslope or downstream flooding or landslides after wildfires. Therefore, impacts would be less than significant.

7.12 REFERENCES

- BFSA. (2024). *Cultural Resources Study Update for the NW Telegraph & Santa Fe Springs Project*. (Appendix C)
- CAL FIRE. (2023). *Fire Hazard Severity Zones in State Responsibility Area*. Retrieved from CAL FIRE: <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008>
- California Department of Conservation. (2022a). *California Important Farmland Finder*. Retrieved from California Department of Conservation: <https://maps.conservation.ca.gov/dlrp/ciff/>
- California Department of Conservation. (2022b). *California Williamson Act Enrollment Finder*. Retrieved from California Department of Conservation: <https://maps.conservation.ca.gov/dlrp/WilliamsonAct/>
- California Department of Transportation. (2024). *State Scenic Highway Map*. Retrieved from Scenic Highways: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>

- California Geological Survey. (2024). *Earthquake Zones of Required Investigation*. Retrieved from EQ Zapp: California Earthquake Hazards Zone Application: <https://www.conservation.ca.gov/cgs/sh/eqzapp>
- City of Santa Fe Springs. (2021a). *Police Services*. Retrieved from City of Santa Fe Springs: https://www.santafesprings.org/departments/police_services/index.php
- City of Santa Fe Springs. (2021b, November). *Safety Element*. Retrieved from Santa Fe Springs 2040 General Plan: <https://www.reimaginesantafesprings.org/documents>
- City of Santa Fe Springs. (2021c). *Santa Fe Springs General Plan and Targeted Zoning Code Update Environmental Impact Report (SCH# 2021050193)*. Retrieved from City of Santa Fe Springs: <https://cms5.revize.com/revize/santafespringsca/departments/planning/environmental%20documents/Environmental%20Impact%20Report%20With%20Appendices.pdf>
- City of Whittier. (2024). *Santa Fe Springs*. Retrieved from Whittier Police Department: <https://www.cityofwhittier.org/government/police/santa-fe-springs>
- EDD. (2023). *Unemployment Rate and Labor Force*. Retrieved from State of California Employment Development Department: <https://labormarketinfo.edd.ca.gov/data/unemployment-and-labor-force.html>
- FEMA. (2021). *FEMA Flood Map Service Center*. Retrieved from FEMA: <https://msc.fema.gov/portal/home>
- Hernandez Environmental Services. (2024). *Biological Resources Assessment for NW Telegraph Road*. **(Appendix C)**
- LGC Geotechnical. (2024, February). *Preliminary Geotechnical Evaluation, APN 8005-0150-051, 12400 Hawkins Street, Santa Fe Springs, CA*. **(Appendix E)**
- Southern California Association of Governments. (2001, October). *Employment Density Study Summary Report*. Retrieved from <https://www.mwcog.org/file.aspx?A=QTTITR24POOOUIw5mPNzK8F4d8djdJe4LF9Exj6lXOU%3D>
- Southern California Association of Governments. (2024, April). *Connect SoCal RTP SCS Demographics and Growth Forecast*. Retrieved from Southern California Association of Governments: <https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839>

This page intentionally left blank.

8. Alternatives

8.1 INTRODUCTION

The identification and analysis of alternatives to a project is a fundamental part of the environmental review process pursuant to CEQA. Public Resources Code (PRC) Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is to identify alternatives to the project."

Pursuant to CEQA Guidelines Section 15126.6(a), an EIR must describe a reasonable range of alternatives to the proposed project or to the project's location that would feasibly avoid or lessen its significant environmental impacts while attaining most of the proposed project's objectives. CEQA Guidelines Section 15126.6(b) emphasizes that the selection of project alternatives be based primarily on the ability to reduce impacts relative to the proposed project. In addition, CEQA Guidelines Section 15126.6(e)(2) requires the identification and evaluation of an "Environmentally Superior Alternative".

Pursuant to CEQA Guidelines Section 15126.6(d), discussion of each alternative presented in this EIR Section is intended "to allow meaningful evaluation, analysis, and comparison with the proposed project." As permitted by CEQA, the significant effects of each alternative are discussed in less detail than those of the proposed Project, but in enough detail to provide perspective and allow for a reasoned choice among alternatives to the proposed Project.

In addition, the "range of alternatives" to be evaluated is governed by the "rule of reason" and feasibility, which requires the EIR to set forth only those alternatives that are feasible and necessary to permit an informed and reasoned choice by the lead agency and to foster meaningful public participation (CEQA Guidelines Section 15126.6(f)). CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors and other considerations (CEQA Guidelines Sections 15091(a)(3), 15364).

Based on the CEQA requirements described above, the alternatives addressed in this EIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative could avoid or substantially lessen any of the identified significant environmental effects of the proposed Project;
- The extent to which the alternative could accomplish the objectives of the proposed Project;
- The potential feasibility of the alternative;
- The appropriateness of the alternative in contributing to a "reasonable range" of alternatives that would allow an informed comparison of relative advantages and disadvantages of the proposed Project and potential alternatives to it; and
- The requirement of the CEQA Guidelines to consider a "no project" alternative; and to identify an "environmentally superior" alternative in addition to the no project alternative (CEQA Guidelines Section 15126.6(e)).

Neither the CEQA statute, the CEQA Guidelines, nor recent court cases specify a specific number of alternatives to be evaluated in an EIR. Rather, "the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice" (CEQA Guidelines 15126(f)).

8.2 SIGNIFICANT ENVIRONMENTAL EFFECTS

CEQA requires the alternatives selected for comparison in an EIR to avoid or substantially lessen one or more significant effects of the Project being evaluated. This analysis evaluates both the potential to avoid or reduce a significant and unavoidable impact, and to avoid the need for mitigation to obtain less than significance levels.

The analysis in Chapter 5 of this Draft EIR determined that a significant and unavoidable Project-specific and cumulative transportation impact would occur, and that potentially significant impacts of the Project related to aesthetics, biological resources, cultural resources, and paleontological resources can be mitigated to a less than significant level.

8.2.1 Significant and Unavoidable Impact

Impact Transportation-2: Conflict, or inconsistency with CEQA Guidelines § 15064.3, Subdivision (B).

The proposed Project would have a significant impact on home-based work (HBW) VMT per employee when compared to the baseline conditions. As discussed in Section 5.9, *Transportation*, the projected HBW VMT per employee for the Project would be 26.5 in 2024, which is 44.9 percent above the threshold of 18.3 VMT per employee. Therefore, the Project would result in a significant project level and cumulative VMT impact. With compliance with existing rules and implementation of CAPCOA measures T-7 and T-8 that are included as Mitigation Measures T-5 and T-11 (included as Mitigation Measure TRA-1), the Project VMT would be reduced 23.8 percent, as shown in Table 5.9-4, *Mitigated Project VMT Analysis*. Despite this reduction, the Project VMT would continue to exceed the baseline threshold by 21.1 percent. Therefore, the Project VMT impacts would be significant and unavoidable.

8.2.2 Impacts Mitigated to Less than Significant

Impact AQ-1: Conflicts with the applicable air quality plan.

As discussed in Section 5.1, *Air Quality*, the SCAQMD's 2022 AQMP is the applicable air quality plan for the proposed Project site. The proposed Project is consistent with the SCAQMD 2022 AQMP and would not result in an impact related to Criterion No.1. Regarding Consistency Criterion No. 2, Construction of the proposed Project would result in regional construction-source emissions that would exceed the SCAQMD thresholds of significance for emissions of ROG. However, with implementation of Mitigation Measure AQ-1 that requires the proposed Project to use low ROG paints, impacts would be reduced to less than significant levels.

Impact AQ-2: Cumulatively considerable net increase to any criteria pollutant.

As detailed in Section 5.1, *Air Quality*, the maximum daily construction emissions for ROG would exceed the significance criteria. However, with implementation of Mitigation Measure AQ-1, which requires the use of low ROG paints, ROG emissions from Project construction would be below the SCAQMD significance thresholds.

Impact BIO-4: Interfere with the movement of any native resident or migratory fish or wildlife species.

As discussed in the Initial Study prepared for the proposed Project (Appendix A), the Project site contains shrubs and some trees that could be used for nesting by common bird species that are protected by the federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code Sections 3503.5, 3511, and 3515 during the avian nesting and breeding season that occurs between February 1 and September 15. The provisions of the MBTA prohibit disturbing or destroying active nests. Therefore, PPP BIO-1 will be implemented to require that if commencement of vegetation clearing occurs between February 1 and

September 15, a qualified biologist shall conduct a nesting bird survey no more than 3 days prior to commencement of activities to confirm the absence of nesting birds. With implementation of the MBTA, as included in PPP BIO-1, potential impacts to nesting birds would be less than significant.

Impact HAZ-1: Significant hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials.

As described in Section 5.5, *Hazards and Hazardous Materials*, the Project site contains TPH and VOCs at levels exceeding the commercial/industrial ESLs, and arsenic levels exceeding background concentrations. In addition, areas of contaminated soils and contaminated oil infrastructure materials may need to be disposed of during the CalGEM well inspection and well closure process. As such, a qualified consultant would be required to prepare and implement a Soil Management Plan (SMP), per SCAQMD Rule 1166 (included as PPP HAZ-1) and LARWQCB requirements, which is included as Mitigation Measure HAZ-1 to be implemented during earthwork and grading to identify soils that are hazardous and require offsite disposal. Furthermore, Mitigation Measure HAZ-2 is included to require a Health and Safety Plan (HSP) to be approved by the Santa Fe Springs Fire Department prior to the issuance of a grading permit or other ground disturbing activities. With implementation of Mitigation Measures HAZ-1 and HAZ-2 and compliance with SCAQMD Rule 1166 (included as PPP HAZ-1), OSHA Safety and Health Standards (29 Code of Federal Regulations 1910.120), and Cal/OSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719), that would be verified by the City during Project permitting and inspections, impacts related to transport, use, or disposal of contaminated materials during construction would be less-than-significant.

Impact HAZ-2: Significant hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

As described in Section 5.5, *Hazards and Hazardous Materials*, due to the identification of TPH, arsenic, and VOCs in onsite soils, preparation and implementation of a SMP (through Mitigation Measure HAZ-1) for excavation, grading, and redevelopment activities pursuant to standard regulatory requirements would be required. In addition, an HSP per OSHA requirements is required (through Mitigation Measure HAZ-2) to implement health and safety requirements to minimize worker and public exposure, and provide response to release and exposure, to hazardous materials during construction, including contaminated soils and vapors that could emanate from contaminated soils. Therefore, with implementation of Mitigation Measures HAZ-1 and HAZ-2, compliance with SCAQMD Rule 1166 (included as PPP HAZ-1), OSHA Safety and Health Standards (29 Code of Federal Regulations 1910.120), Cal/OSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719), and Municipal Code requirements (included as PPP HAZ-4 through PPP HAZ-6) that would be verified through the City's development permitting process, potential impacts related to significant hazard to the public or environment through the reasonably foreseeable release of contaminated soils or potential vapors from contaminated soils would be less than significant.

Impact PAL-1: Unique paleontological resources.

No previously discovered fossils have been found on the site. However, significant fossils have been found within similar sediments in the region. Therefore, although unique paleontological resources are not anticipated to be found onsite, Mitigation Measure PAL-1 is included to require paleontological monitoring during mass grading and excavation activities in undisturbed alluvial deposits. Mitigation Measure PAL-1 includes City of Santa Fe Springs guidelines and Society of Vertebrate Paleontology recommendations to reduce adverse impacts to paleontological resources to a level below significant. Therefore, with implementation of Mitigation Measure PAL-1, impacts to unique paleontological resources would be less than significant.

Impact TCR-1: Substantial adverse change in the significance of a tribal cultural resource.

No known tribal cultural resources (TCRs) were identified within the Project site by the Cultural Resources Study (Appendix D). Additionally, as part of the City's AB 52 consultation process, the City reached out to Native American tribes who may have knowledge of tribal cultural resources within the Project area. No known tribal cultural resources or sensitive sites were identified within the Project site during the AB 52 consultation process. Construction of the proposed Project would include earthmoving activities, such as grading, which have the potential to disturb previously unknown TCR on the Project site. Although AB 52 consultation did not yield substantial evidence that listed or eligible tribal cultural resources—pursuant to criteria in Pub. Resources Code Section 5024.1(c)—within the Project site, PPP CUL-1 and Mitigation Measures CUL-1, TCR-1, TCR-2, TCR-3, and TCR-4, would be implemented to ensure that potential impacts related to the inadvertent discovery of TCRs are less than significant.

8.3 PROJECT OBJECTIVES

The Project site plan has been designed to meet a series of Project-specific objectives that have been carefully crafted in order to aid decision makers in their review of the Project and its associated environmental impacts. The primary purpose and goal of the Project is to redevelop an underutilized property with an industrial use to provide an employment-generating use to help grow the economy in the City of Santa Fe Springs. The Project would achieve this goal through the following objectives:

1. To make efficient use of an underutilized property in the City of Santa Fe Springs by redeveloping it with a modern industrial warehouse that adds to its potential for employment-generating uses and that aligns with the City's General Plan and zoning designations.
2. To redevelop an underutilized property with an industrial warehouse building near Interstate 5 and Interstate 605, to help meet demand for logistics business in the City and surrounding region.
3. To attract new business and employment to the City of Santa Fe Springs and thereby promote economic growth.
4. To build an industrial warehouse project in the City of Santa Fe Springs that is compatible with the surrounding industrial and manufacturing uses that were recently built or recently approved for construction in the City of Santa Fe Springs.

8.4 ALTERNATIVES CONSIDERED BUT REJECTED

Pursuant to State CEQA Guidelines Section 15126.6(c), an EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are potentially feasible and, therefore, merit in-depth consideration, and which are infeasible and need not be considered further. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (State CEQA Guidelines Section 15126.6(f), (f)(3)). This section identifies alternatives considered by the lead agency but rejected as infeasible and provides a brief explanation of the reasons for their exclusion. Alternatives may be eliminated from detailed consideration in the Draft EIR if they fail to meet most of the Project objectives, are infeasible, or do not avoid any significant environmental effects.

Alternate Site Alternative. An alternate site for the Project was eliminated from further consideration. Based on a review of available sites for sale and the City of Santa Fe Springs land use map, there are no other available, suitable sites within the control of the Project Applicant. However, in the event land could be purchased of suitable size, the Project could have the same potential impacts to air quality, biological resources, hazards and hazardous materials, transportation, paleontological resources, and tribal cultural resources. Moreover, other possible sites may not be located in proximity to Interstate 605 (I-605),

established truck routes, and with access to available infrastructure, including roads and utilities thereby possibly resulting in further potential impacts. Therefore, analysis of an alternative site for the proposed Project is neither meaningful nor necessary, because the impacts and need for mitigation resulting from the proposed Project would not be avoided or substantially lessened by its implementation. Given these reasons, it would be infeasible to develop and operate the Project on an alternate site with fewer environmental impacts while meeting Project objectives. Therefore, the Alternative Site Alternative was rejected from further consideration.

8.5 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Three alternatives to the Project have been identified for further analysis as representing a reasonable range of alternatives that attain most of the Project Objectives, may avoid or substantially lessen the Project's significant impact, avoid the need for mitigation, or are feasible from a development perspective. The following alternatives have been developed based on the criteria identified in Section 8.1:

Alternative 1: No Project/No Development Alternative. Consistent with the requirements of CEQA Guidelines Section 15126.6(e), this alternative consists of the Project not being approved, and the Project site remaining in the condition that existed at the time the Notice of Preparation (NOP) was published (May 13, 2024). This includes operation of the existing oil well uses on the Project site.

Alternative 2: Reduced Project Alternative. This Reduced Project Alternative consists of development of the Project site in a manner similar to the Project, but with a 50 percent reduction in square footage and operational intensity. Specifically, the Reduced Project Alternative would result in development of two warehouse buildings. Building 1 would be approximately 149,186 SF on the 585,762 SF (13.45-acre) Parcel 1, resulting in a FAR of 0.26. Building 2 would be approximately 143,152 SF on the 570,462 SF (13.09-acre) Parcel 2, resulting in a FAR of 0.25. This alternative would include construction of an onsite drainage system comprised of two underground infiltration trenches, like the proposed Project. Development under the Reduced Project Alternative would reduce the total Project square footage by approximately 50 percent, or by 292,339 on the 26.77-acre Project site.

Consistent with the proposed Project, improvements onsite would include landscaping, utility connections, implementation of stormwater facilities, construction of a cul-de-sac driveway on Hawkins Street and pavement of parking areas and driveways. The reduced square footage would allow for increased setbacks, passenger vehicle parking, and truck parking. Consistent with the proposed Project, this alternative would plug the existing oil wells and remove the oil well equipment and infrastructure on the site. Due to the existing oil well uses and areas of contaminated soils, this alternative includes grading the entire site, and areas planned for physical impact onsite would be identical to those required for development of the proposed Project. Consistent with the proposed Project, the Reduced Project Alternative does not require offsite improvements. The buildings would operate as two speculative industrial warehouses with 80 percent high-cube fulfillment warehouse, 10 percent high-cube cold storage, and 10 percent manufacturing.

Alternative 3: Alternative Use and Buildout Alternative (Develop One Building with Manufacturing Use and One Storage Yard). This alternative consists of developing the Project site in an alternative manner that is consistent with the existing zoning designation. The Heavy Manufacturing (M-2) zone district provides sites for heavy industrial uses, oil and gas drilling, select manufacturing operations, salvage operations, automobile and truck services, and similar compatible uses. The M-2 zone also permits any use listed as permitted under the Light Manufacturing (M-1) zone district. (Santa Fe Springs Municipal Code Section 155.241). The purpose of the M-1 Zone is to provide appropriately located areas for the establishment of light industrial plants and related activities and to promote the concentration of such uses in a manner which will foster mutually beneficial relationships with each other, as well as with the areas of the city zoned for heavy industrial development (Santa Fe Springs Municipal Code Section 155.210).

This alternative assumes that the approximately 26.77-acre site would be developed with one 298,373 SF, (inclusive of 5,000 SF of office space and 5,000 SF of mezzanine area) speculative manufacturing building on Parcel 1 and one 286,305 SF storage yard located on Parcel 2. Under this alternative, the building area would be the same as Building 1 of the proposed Project. The warehouse area would operate as 100 percent manufacturing use.

Like the proposed Project, this alternative would include construction of an onsite drainage system comprised of two underground infiltration trenches. However, the size of the drainage system would be reduced as compared to the proposed Project. Consistent with the proposed Project, improvements onsite would include landscaping, utility connections, implementation of stormwater facilities, construction of a cul-de-sac driveway on Hawkins Street and pavement of parking areas and driveways. Areas planned for physical impact onsite would be identical to those required for development of the proposed Project.

8.6 ALTERNATIVE 1: NO PROJECT/NO DEVELOPMENT

Pursuant to State CEQA Guidelines Section 15126.6(e), this Draft EIR is required to “discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services [...] In certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.”

The No Project/No Development Alternative allows decision-makers to compare the environmental impacts of approving the proposed Project to the environmental impacts that would occur if the property were to be left in its existing conditions for the foreseeable future. Under the existing conditions, the Project site continues to be used for oil well extraction activities with continuing operation of the existing oil wells on the site. See Section 4, *Environmental Setting*, for additional details regarding the existing conditions at the Project site.

8.6.1 Environmental Impacts

Air Quality

Under this alternative no new development would occur in the Project site. This alternative would not generate any construction activities and construction related mitigation measures would not be required. Also, no new stationary sources of air pollution would be introduced. However, existing emissions from ongoing well extraction activities would continue to occur. This alternative would not require implementation of new mitigation measures; and thus, impacts from this alternative would be less than those that would occur from the proposed Project. Therefore, this alternative would not require mitigation to avoid the Project’s less than significant impacts related to conflict with the 2022 AQMP. The same less than significant impacts related to cumulatively considerable net increase of criteria pollutants would occur from the ongoing well activities. Lastly, this alternative would also have similar less than significant impacts related to the exposure of sensitive receptors to substantial pollutant concentrations and related to other emissions that adversely affect a substantial number of people. Therefore, the No Project/No Development alternative would avoid the need to implement mitigation measures that are required for the proposed Project; and therefore, impacts from the No Project/No Development Alternative would be less than those of the proposed Project.

Energy

Under the No Project/No Development Alternative, there would be no new development on the site, and there would be no increase in demand from the Project site for energy resources. As such, the No Project/No

Development Alternative would completely avoid the Project's less than significant impacts associated with the consumption of energy resources during construction and long-term operation. Neither the Project nor the No Project/No Development Alternative would conflict with a State or local plan for renewable energy or energy efficiency, although impacts would be reduced under the No Project/No Development Alternative in comparison to the Project because the No Project/No Development Alternative would not result in an increase in the use of energy resources.

Geology and Soils

Under this alternative, no new development activities would occur at the Project site. As such, no new grading or excavation related construction activities would occur under this alternative. However, the existing oil well activities that are ground disturbing would continue to occur. Therefore, the No Project/No Development Alternative would not require the mitigation that would be required by the Project to avoid potential impacts to paleontological resources. Therefore, impacts from the No Project/No Development Alternative would be less than those of the proposed Project.

Greenhouse Gas Emissions

No new development activities would occur at the Project site or operation of new structures that would generate GHGs under this alternative. Under this alternative, no additional vehicle trips would be introduced to the Project site, which is the source of most of the greenhouse gas emissions from the proposed Project as discussed in Section 5.4, *Greenhouse Gas Emissions*. This alternative would also be consistent with all applicable air quality plans. Therefore, the No Project/No Development Alternative would result in less impacts related to greenhouse gas emissions as compared to the proposed Project. However, impacts from both the No Project/No Development Alternative and the proposed Project would be less than significant.

The No Project/No Development Alternative would not achieve the City's General Plan Policy S-3.6, to promote the gradual consolidation and elimination of oil drilling and production sites to advance the City's climate adaptation and resiliency strategies, local reduction of greenhouse gases, and land use goals.

Hazards and Hazardous Materials

Existing site conditions, including one office building and over 100 oil wells that consist of active, idle, plugged, and cancelled wells would remain "as is" under the No Project/No Development Alternative. No new development activities would occur at the Project site or operational uses that could generate, use, and result in transport of, hazardous materials. The No Project/No Development Alternative would not include major construction activities that would use typical construction-related hazardous materials. However, the existing contaminated soils and oil well infrastructure would remain on the site and hazardous materials related to the operation of the existing oil wells would continue to occur. Therefore, the No Project/No Development Alternative would avoid the need to implement the construction related mitigation measures that implement regulations for clean up and disposal of contaminated soils, and would avoid implementation of regulations related to methane gas; however, the benefits of the Project, which include removal and disposal of contaminated soils and removing oil well activities from the site would not occur. Overall, the No Project/No Development Alternative would result in a less than significant impact, and no mitigation measures would be required; but contamination and related activities would continue to occur.

Hydrology and Water Quality

Existing water quality conditions, groundwater supplies, drainage patterns, and runoff water amounts would remain "as is" under this alternative as no new development would occur. This alternative would not introduce new sources of water pollutants from either the construction or operation phases of development to the

Project site, because no new development would occur. However, contaminated soils that include TPH and arsenic would remain on-site. Although, this alternative would not introduce new impervious areas; oil well activities that could affect water quality would continue to occur on the site. Both the No Project/No Development Alternative and the proposed Project would comply with existing regulations related to water quality. Therefore, both the proposed Project and the No Project/No Development Alternative would result in less than significant hydrology and water quality impacts.

Mineral Resources

The No Project/No Development Alternative would result in maintaining the existing site conditions comprised of one existing 3,310 SF office building, one 1,282 SF canopy structure, with the remainder of the site utilized for oil extraction. The site would continue to be used for oil well activities. Under this alternative, no development activities would occur at the Project site and current oil well operations would continue onsite. Therefore, No Project/No Development Alternative provide for continued access to oil resources and would avoid the Project's less than significant impacts related to the loss of availability of a known mineral resource that is of value to the region and the residents of the state.

However, the No Project/No Development Alternative would not achieve the City's General Plan Policy S-3.6, to promote the gradual consolidation and elimination of oil drilling and production sites to advance the City's climate adaptation and resiliency strategies, local reduction of greenhouse gases, and land use goals.

Noise

Under this alternative, no development would occur onsite, and no new sources of noise would be introduced to the Project site or surrounding areas. Since no new development would occur and no new traffic trips would be generated, this alternative would not contribute to an incremental increase in area-wide traffic noise levels. In addition, this alternative would not result in construction onsite and no construction noise or vibration would occur. This alternative would avoid the Project's less than significant impact related to noise. However, existing noise from the oil well operations and related traffic would continue to occur.

Transportation

The Project site is located within a SCAG Tier 1 Traffic Analysis Zone (TAZ) (TAZ 21832000). This alternative would not result in new development, and as such, would not result in any new trips, traffic, or changes to VMT related to operation of the Project site. This alternative would not impact existing transit service and alternative transportation facilities within the Project site. As the Project site would not be developed and trips would not be generated, the No Project/No Development Alternative avoids the Project's significant and unavoidable impacts related to VMT; however, this alternative would continue the existing oil well related trips within the SCAG Tier 1 TAZ (TAZ 21832000) that is a "Higher than City Baseline" area for home-based work (HBW) trip VMT per employee per the *City of Santa Fe Springs Transportation Study Guidelines*. As such, the site would still be located in a high employment VMT area.

Tribal Cultural Resources

Under this alternative, existing conditions would remain, and no new development would occur. No grading or excavation would occur that could impact tribal cultural resources that may be buried below ground. Although the Project would result in less than significant impacts to tribal cultural resources with implementation of mitigation measures, this alternative would eliminate the need for mitigation for tribal cultural resources. Therefore, the No Project/No Development Alternative would result in less impacts than the proposed Project.

Utilities and Service Systems

Under this alternative, existing conditions would remain, and no new development would occur. No additional configurations or connections to existing domestic water, wastewater, stormwater drainage, electric power, natural gas, or telecommunication facilities would be needed under this alternative, and there would be no change in the demand for domestic water or wastewater treatment services. This alternative would also not result in increased demand for solid waste collection and disposal. Selection of this alternative would result in no impact to utilities and service system providers and would avoid the project's less than significant impacts.

8.6.2 Conclusion

Ability to Reduce Impacts

The No Project/No Development Alternative would result in maintaining the existing site conditions of heavily disturbed from existing and previous oil well construction and operational activities. The proposed development would not occur under the No Project/No Development Alternative. As a result, this alternative would avoid the need for mitigation measures that are identified in Section 5 of this Draft EIR, which include measures related to air quality, biological resources, hazards and hazardous materials, paleontological resources, transportation, and tribal cultural resources. This alternative would also avoid the significant and unavoidable impacts to transportation. This alternative would result in lessened impacts to 10 of the 11 environmental topics analyzed in this Draft EIR (see Table 8-2).

However, the environmental benefits of the proposed Project would also not be realized, including, but not limited to removal and disposal of the existing contaminated soils and removal of the oil well activities on the Project site that generate hazardous materials. Furthermore, the No Project/No Development Alternative would not achieve the City's General Plan Policy S-3.6, to promote the gradual consolidation and elimination of oil drilling and production sites to advance the City's climate adaptation and resiliency strategies, local reduction of greenhouse gases, and land use goals.

Ability to Achieve Project Objectives

As shown in Table 8-3, below, the No Project/No Development Alternative would not meet any of the Project objectives. This alternative would not make efficient use of the site for employment uses, would not help meet demand for logistic businesses in the city and surrounding region, would not attract new businesses and employment, and would not build a project that is compatible with the surrounding industrial and manufacturing uses that were recently built or approved for construction. Thus, the Project objectives would not be achieved from implementation of the No Project/No Development Alternative.

8.7 ALTERNATIVE 2: REDUCED PROJECT ALTERNATIVE

The Reduced Project Alternative consists of development of the Project site in a manner similar to the Project, but with a 50 percent reduction in square footage. Specifically, the Reduced Project Alternative would result in the development of two warehouse buildings. Building 1 would total be approximately 149,186 SF on the 585,762 SF (13.45-acre) Parcel 1, resulting in a FAR of 0.26. Building 2 be approximately 143,152 SF on the 570,462 SF (13.09-acre) Parcel 2, resulting in a FAR of 0.25. Development under the Reduced Project Alternative would reduce Project square footage by approximately 50 percent, or by 292,339 SF on the 26.77-acre Project site.

Consistent with the proposed Project, improvements onsite would include landscaping, utility connections, implementation of stormwater facilities, construction of a cul-de-sac driveway on Hawkins Street and pavement of parking areas and driveways. The reduced square footage would allow for increased setbacks, passenger vehicle parking, and truck parking. The reduced square footage would allow for increased setbacks, passenger vehicle parking, and truck parking. Consistent with the proposed Project, this alternative would plug the existing oil wells and remove the oil well equipment and infrastructure on the site. Due to the existing oil well uses and areas of contaminated soils, this alternative includes grading the entire site, and areas planned for physical impact onsite would be identical to those required for development of the proposed Project. Consistent with the proposed Project, the Reduced Project Alternative does not require offsite improvements. The buildings would operate as two speculative industrial warehouses with 80 percent high-cube fulfillment warehouse, 10 percent high-cube cold storage, and 10 percent manufacturing.

8.7.1 Environmental Impacts

Air Quality

Under this alternative, approximately 50 percent less built area, or 292,339 fewer square feet would be developed, which would result in fewer vehicle and truck trips and a reduction of paint needed for architectural coating. As shown in Table 8-1, construction ROG emissions for the proposed Project are 139.3 pounds per day and would exceed SCAQMD threshold of 75 pounds per day. ROG emissions occur from paints used during the architectural coating phase. Therefore, Mitigation Measure AQ-1 is included to require the proposed Project to use low ROG paints to reduce ROG emissions to less than significant levels.

The Reduced Project Alternative would reduce the building size by 50 percent. Thus, resulting in a reduction in the amount of paint needed for architectural coating. Under this alternative, ROG emissions would be approximately 69.7 (50 percent reduction). As such, this alternative would result in less than significant impacts and would not require implementation of Mitigation Measure AQ-1. Therefore, this alternative results in less impacts as compared to the proposed Project without mitigation.

Table 8-1: Proposed Project Construction Emissions Without Mitigation

Construction Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2025						
Demolition	2.6	35.8	32.0	0.0	7.7	4.4
Site Preparation	3.9	35.8	32.0	0.0	7.7	4.4
Grading	4.0	53.8	41.4	0.2	9.3	3.9
Maximum Daily Emissions	4.0	53.8	41.4	0.2	9.3	4.4
2026						
Grading	3.8	51.0	40.1	0.2	9.2	3.8
Building	2.1	16.9	31.5	0.1	4.5	1.4
Paving	2.3	7.2	10.8	0.0	0.5	0.3
Architectural Coating	139.3	1.4	4.2	0.0	0.7	0.2
Maximum Daily Emissions	139.3	51.0	40.1	0.2	9.2	3.8
2027						
Architectural Coating	139.3	1.3	4.0	0.0	0.7	0.2
Maximum Daily Emissions	139.3	1.3	4.0	0.0	0.7	0.2

Construction Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Maximum Daily Emission 2025-2027	139.3	53.8	41.4	0.2	9.3	4.4
SCAQMD Significance Thresholds	75	100	550	150	150	55
Threshold Exceeded?	Yes	No	No	No	No	No

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Energy

Under the Reduced Project Alternative, approximately 50 percent less building area, or 292,339 fewer SF, would be developed on the Project site. This would result in an approximately 50 percent decrease in the demand for operational energy in comparison to the proposed Project, which was determined to be less than significant. Like the Project, this alternative would be required include typical Title 24 measures such as insulation, use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC), solar-reflective roofing materials, energy-efficient indoor and outdoor lighting systems, reclamation of heat rejection from refrigeration equipment to generate hot water, and incorporation of skylights. The alternative would also require the use of diesel fuel for trucking operations; however, operations would be reduced by 50 percent capacity as a result of reduction in facility size. Therefore, impacts to energy from the Reduced Project Alternative would be less than those associated with the proposed Project, but would also be less than significant. Therefore, while Project impacts to energy would be reduced compared to the proposed Project; impacts would continue to be less than significant, consistent with the proposed Project.

Geology and Soils

Under this alternative, approximately 50 percent less building area would be developed within the Project site. Areas planned for physical impact onsite would be identical to those required for development of the proposed Project. As discussed in Section 5.3, Geology, significant fossils have been found within similar sediments in the region. As such, like the proposed Project, this alternative would require implementation of Mitigation Measure PAL-1 to require paleontological monitoring during mass grading and excavation activities of undisturbed alluvial deposits starting at five feet below the surface by a qualified paleontologist to identify, salvage, and recover any potential paleontological resources, such as significant fossil remains. As a result, this alternative would result in less than significant impacts with mitigation to geology and soils (paleontological resources), and therefore, would be consistent with the Project's impact.

Greenhouse Gas Emissions

Under the Reduced Project Alternative, approximately 50 percent less building area would be developed within the Project site. Therefore, a reduced volume of construction activities and related production of GHG emissions would occur during construction of the buildings. In addition, the reduced amount of development by this alternative would result in less stationary source emissions from onsite equipment, and less traffic associated GHG emissions than the proposed Project. Therefore, the overall volume of GHG emissions would be reduced in comparison to the proposed Project. The proposed Project would generate a net total of approximately 9,006 MTCO₂e per year, which would not exceed the screening threshold of 10,000 MTCO₂e per year. It is expected that operational GHG emissions from this alternative would be approximately 50 percent less as than the Project and would therefore, also not exceed the screening threshold. GHG impacts under this alternative would remain less than significant and be less than the proposed Project.

Hazards and Hazardous Materials

Under this alternative, the 26.77-acre site would be redeveloped with two new speculative warehouse buildings with a combined total building area of 584,678 SF and a combined total footprint of 564,678 SF. Due to the existing oil well uses and areas of contaminated soils, this alternative includes grading the entire site, and areas planned for physical impact onsite would be identical to those required for development of the proposed Project.

Like the proposed Project, this alternative would demolish the existing building onsite, cease existing oil well activity and abandon the existing onsite oil wells; which would require implementation of PPP HAZ-1 through PPP HAZ-8. Soil excavation would be reduced under this alternative because buildings footprints and size of the underground infiltration trenches would be reduced. As such, this alternative would reduce the volume of contaminated soils that would require disposal. However, this alternative would continue to require Mitigation Measures HAZ-1 and HAZ-2 to implement a soil management plan and a health and safety plan. Like the proposed Project, this alternative would comply with existing regulations regarding the abandonment of oil wells, transport, use, and disposal of hazardous materials such as contaminated soils and oil well equipment that would reduce potential impacts to a less than significant level.

In addition, this alternative would likely require the same utilization of hazardous materials during operation, including small quantities of household cleaners, lubricants, batteries, etc. as the proposed Project (albeit to a lesser degree). Overall, this alternative would result in similar impacts as compared to the proposed Project and impacts related to hazards and hazardous materials would be less than significant after implementation of mitigation.

Hydrology and Water Quality

Under this alternative, the 26.77-acre site would be redeveloped with two new speculative warehouse buildings with a combined total building area of 584,678 SF and a combined total footprint of 564,678 SF. Due to the decrease in square footage developed, development of this alternative would result in a decrease in impermeable surfaces compared to those required for development of the Project. Construction of the alternative would construct underground infiltration trenches but would likely be of a smaller size due to the smaller area of impervious surfaces. In addition, preparation of a SWPPP and a WQMP would be required for development of this alternative. Overall, consistent with the proposed Project, this alternative would result in less than significant impacts related to hydrology and water quality.

Mineral Resources

The Reduced Project Alternative would redevelop the 26.77-acre site that is currently utilized for oil extraction. This alternative would construct two new speculative warehouse buildings with a combined total building area of 584,678 SF and a combined total footprint of 564,678 SF, with 80 percent high-cube fulfillment warehouse, 10 percent high-cube cold storage, and 10 percent manufacturing. Similar to the proposed Project, this alternative would abandon and close out all existing oil wells onsite. As such, impacts to mineral resources from this alternative would be the same as the proposed Project. Therefore, impacts related to the loss of availability of a known mineral resource that is of value to the region and the residents of the state would continue to be less than significant.

Noise

Under this alternative, the 26.77-acre site would be developed with two new speculative warehouse buildings with a combined total building area of 584,678 SF and a combined total footprint of 564,678 SF. Development under the Reduced Project Alternative would reduce the total Project square footage by

approximately 50 percent, or by 292,339. The operation of this alternative would result in approximately 50 percent fewer daily trips in comparison to the proposed Project because of the reduction in square footage; however, under both conditions impacts would be less than significant. Short-term noise and vibration impacts would occur during construction similar to the Project. Like the Project, long-term operational noise would not expose nearby sensitive receivers to noise levels over the city's daytime noise standards. Overall, this alternative would result in less operational noise than those from the Project, but consistent with the Project, impacts would be less than significant.

Transportation

Under this alternative, the 26.77-acre site would be redeveloped with two new speculative warehouse buildings with a combined total building area of 584,678 SF and a combined total footprint of 564,678 SF. Development under the Reduced Project Alternative would reduce the total Project square footage by approximately 50 percent, or by 292,339 SF. The operation of this alternative would result in fewer daily employee trips in comparison to the proposed Project because of the reduction in square footage. However, the Project site is located within a SCAG Tier 1 Traffic Analysis Zone (TAZ) (TAZ 21832000). The TAZ is identified as being "Higher than City Baseline" for home-based work (HBW) trip VMT per employee per the *City of Santa Fe Springs Transportation Study Guidelines*. As such, the Reduced Project Alternative would still be located in a high employment VMT area. Therefore, consistent with the proposed Project, the Reduced Project Alternative would require implementation of the same mitigation measures and would result in a significant and unavoidable impact related to VMT.

Tibal Cultural Resources

Under this alternative, the 26.77-acre site would be developed with two new speculative warehouse buildings with a combined total building area of 584,678 SF and a combined total footprint of 564,678 SF. The reduced square footage would allow for increased setbacks, passenger vehicle parking, and truck parking. Areas planned for physical impact onsite would be identical to those required for development of the proposed Project; however, the depth of excavation of areas would be reduced with the reduced building footprint area. Although a smaller area of potential impact, tribal cultural resource impacts would be similar to the Project due to grading and excavation activities that require the same mitigation measures. Therefore, impacts from the Reduced Project Alternative would be similar to those of the proposed Project.

Utilities and Service Systems

The level of development onsite would be decreased under this alternative as compared to the proposed Project. Both the Project and this alternative would require installation of underground electric and communication lines that would connect to existing infrastructure which would also be undergrounded near the northern property line. Additionally, both the Project and this alternative would connect to the existing 6-inch natural gas line within Hawkins Street. Impacts associated with the provision of such facilities would be similar and would be less than significant upon compliance with existing regulatory requirements. Although impacts would be decreased under this alternative due to the decrease in building size/capacity and associated demand for water resources, impacts to water supply would continue to be less than significant. Similarly, SFSWUA and LACSD would have adequate capacity to treat wastewater generated under both the Project and this alternative; however, this alternative would require less water and would generate less wastewater than the proposed Project. This alternative would also generate less solid waste than the proposed Project and would require less landfill capacity. Overall, this alternative would result in less than significant impacts related to utilities and service systems, which although less in volume, would result in similar less than significant impacts as the proposed Project.

8.7.2 Conclusion

Ability to Reduce Impacts

The Reduced Project Alternative would eliminate the need for air quality mitigation measures. However, mitigation measures for geology and soils (paleontological resources), hazards and hazardous materials, transportation, and tribal cultural resources would continue to be required for this alternative. The Reduced Project Alternative would generally result in a reduction in the volume of effects due to the 50 percent reduction in building space. However, this alternative would continue to result in significant and unavoidable impacts to transportation and would only reduce the impact level of air quality, 1 of the 11 environmental topics analyzed in this Draft EIR (see Table 8-2).

Ability to Achieve Project Objectives

As shown in Table 8-3, below, the Reduced Project Alternative would partially meet the majority of Project objectives, but not to the same extent as the proposed Project. This alternative would redevelop a property in the City of Santa Fe Springs with industrial uses, adding to its potential employment-generating uses and would attract new businesses and employment. Furthermore, the Reduced Project Alternative would develop a speculative warehouse building within proximity to I-5 and I-605 that is compatible with other industrial buildings that were recently built or recently approved by the City. However, this alternative would not meet the main Project objectives to the same extent as the proposed Project would, since the proposed Project would accomplish the same goals, but generally to a greater degree.

8.8 ALTERNATIVE 3: ALTERNATIVE USE AND BUILDOUT ALTERNATIVE (DEVELOP ONE BUILDING WITH MANUFACTURING USE AND ONE STORAGE YARD)

The Buildout of Existing Zoning Alternative consists of development of the Project site at a maximum density in an alternative manner that is consistent with the existing zoning designation. As compared to the proposed Project, this alternative would remove Building 2 and develop Building 1 but with manufacturing and accessory office uses. In addition, this alternative would include construction of one storage yard in Parcel 2. Specifically, the Buildout of Existing Zoning Alternative would result in development of one 298,373 SF manufacturing building on the 13.45 parcel with a FAR of 0.51 and one 286,305 SF storage yard on the 13.09 parcel.

Consistent with the proposed Project, improvements onsite would include removal and closure of the existing oil wells, removal and disposal of the contaminated soils, landscaping, utility connections, implementation of stormwater facilities, construction of a cul-de-sac driveway on Hawkins Street and pavement of parking areas and driveways. Areas planned for physical impact on and offsite would be identical to those required for development of the proposed Project. Like the proposed Project, the Buildout of Existing Zoning Alternative does not require offsite improvements. The warehouse portion of the building under this alternative would operate as 100 percent manufacturing.

8.8.1 Environmental Impacts

Air Quality

This alternative would redevelop the existing site with one 298,373 SF manufacturing building and one 286,305 SF storage yard. The manufacturing building would have the same square footage as Building 1

of the proposed Project. The warehouse portion of the building under this alternative would operate as 100 percent manufacturing (the proposed Project was conservatively assumed in this Draft EIR to operate as 80 percent high-cube fulfillment warehouse, 10 percent high-cube cold storage, and 10 percent manufacturing).

As shown in Table 8-1, construction ROG emissions for the proposed Project are 139.3 pounds per day and would exceed SCAQMD threshold of 75 pounds per day. ROG emissions occur from paints used during the architectural coating phase. Therefore, Mitigation Measure AQ-1 is included to require the proposed Project to use low ROG paints to reduce ROG emissions to less than significant levels.

The Buildout of Existing Zoning Alternative would reduce the total building area by approximately 51 percent (or 286,305 SF) because Building 2 would not be developed under this alternative. Thus, this alternative would have a reduction in the amount of paint needed for architectural coating. Under this alternative, ROG emissions would be approximately 68.3 (51 percent reduction). As such, this alternative would result in less than significant impacts and would not require implementation of Mitigation Measure AQ-1. Therefore, this alternative results in less construction air quality impacts as compared to the proposed Project.

For operational impacts, the proposed Project is calculated to generate a total of 1,394 daily trips including 130 AM peak hour trips, and 138 PM peak hour trips. This alternative would result in 1,418 (or 24 more) daily trips, 203 (or 73 more) AM peak hour trips and 221 (or 83 more) PM peak hour trips compared to the proposed Project. Under this alternative, air quality impacts would be slightly greater than those under the proposed Project due to increased emissions resulting from the increase in number of trips/mobile emissions. The proposed Project has less than significant operational air quality impacts. The maximum daily emissions of NO_x for the proposed Project are estimated to be 54.0 pounds per day, which is close to exceeding the SCAQMD threshold of 55 pounds per day. NO_x is a byproduct of combustion processes such as automobiles and industrial operations. As such, NO_x emissions would increase under this alternative due to increased daily trips and increased manufacturing uses. Therefore, this alternative could result in greater operational air quality emissions than those associated with the Project and impacts could require mitigation and may be significant and unavoidable.

Energy

Under the Buildout of Existing Zoning Alternative, the Project site would be developed with one speculative manufacturing building located in the northern portion of the site on Parcel 1 and one 286,305 SF storage yard located on Parcel 2. Like the Project, this alternative would be required include typical Title 24 measures such as insulation, use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC), solar-reflective roofing materials, energy-efficient indoor and outdoor lighting systems, reclamation of heat rejection from refrigeration equipment to generate hot water, and incorporation of skylights. Thus, with implementation of existing regulations and policies, this alternative would not obstruct use of renewable energy or energy efficiency.

The alternative would also require the use of diesel fuel for trucking operations. This alternative would have an increase in fuel usage as compared to the proposed Project resulting from the 24 additional trips. Although more energy would be used by this alternative, it would not be used in a wasteful, inefficient, or unnecessary manner because it would comply with Title 24, Part 6 (Energy Efficiency Standards) and implement typical Title 24 measures, consistent with the proposed Project. Therefore, impacts to energy from the Buildout of Existing Zoning Alternative would be more than the Project but would remain less than significant, which is consistent with the proposed Project.

Geology and Soils

Under this alternative, approximately 51 percent less building area would be developed within the Project site. Parcel 1 would be developed with one of 298,373 SF building, like Building 1 of the proposed Project. Parcel 2 would be developed with one 286,305 SF storage yard. Areas planned for physical impact onsite would be identical to those required for development of the proposed Project. As discussed in Section 5.3, *Geology*, significant fossils have been found within similar sediments in the region. As such, like the proposed Project, this alternative would require implementation of Mitigation Measure PAL-1 to require paleontological monitoring during mass grading and excavation activities of undisturbed alluvial deposits starting at five feet below the surface by a qualified paleontologist to identify, salvage, and recover any potential paleontological resources, such as significant fossil remains. As a result, this alternative would result in less than significant impacts with mitigation to geology and soils (paleontological resources), and therefore, would be consistent with the proposed Project's impact.

Greenhouse Gas Emissions

Under the Buildout of Existing Zoning Alternative, approximately 51 percent less building area would be developed within the Project site. Parcel 1 would be developed with one of 298,373 SF building, like Building 1 of the proposed Project. Parcel 2 would be developed with one 286,305 SF storage yard. However, as discussed in Section 5.4, *Greenhouse Gas Emissions*, a majority of the Projects GHG emissions are from mobile sources such as emission from vehicles and trucks. Development of this alternative would result in approximately 1,418 (or 24 more) daily trips, 203 (or 73 more) AM peak hour trips and 221 (or 83 more) PM peak hour trips compared to the proposed Project. The slight increase in additional trips are a result of the 100 percent manufacturing use that would be implemented by this alternative.

The proposed Project's operational GHG emissions are 9,006, which is below the threshold of 10,000 MTCO₂e/yr. As the number of trips would increase by 24, GHG emissions under this alternative would be slightly above GHG emissions from the proposed Project but would still be below the threshold of 10,000 MTCO₂e/yr, as the increase in trips is not substantial. As such, impacts under this alternative would be less than significant, but slightly higher than the proposed Project.

Hazards and Hazardous Materials

Under this alternative, the 26.77-acre site would be redeveloped with two new speculative warehouse buildings with a combined total building area of 584,678 SF and a combined total footprint of 564,678 SF. Areas planned for physical impact onsite would be identical to those required for development of the proposed Project.

Like the proposed Project, this alternative would demolish the existing building onsite, cease existing oil well activity and abandon the existing onsite oil wells which would require implementation of PPP HAZ-1 through PPP HAZ-8. Areas planned for physical impact onsite would be identical to those required for development of the proposed Project. However, soil excavation would be reduced under this alternative because building footprint and size of the new underground infiltration trenches would be reduced. As such, this alternative would reduce the volume of contaminated soils that need disposal. However, this alternative would continue to require Mitigation Measures HAZ-1 and HAZ-2 to implement a soil management plan and a health and safety plan. Like the proposed Project, this alternative would comply with existing regulations regarding the abandonment of oil wells, transport, use, and disposal of hazardous materials such as contaminated soils and oil well equipment that would reduce potential impacts to a less than significant level.

In addition, this alternative would likely require the same utilization of hazardous materials during operation, including small quantities of household cleaners, lubricants, batteries, etc. as the proposed Project (albeit to a lesser degree). Overall, this alternative would result in similar impacts as compared to the proposed Project

and impacts related to hazards and hazardous materials would be less than significant after implementation of mitigation.

Hydrology and Water Quality

Under this alternative, the 26.77-acre site would be developed with one new 298,373 SF manufacturing building on Parcel 1 and one 286,305 SF storage yard on Parcel 2. Areas planned for physical impact onsite would be identical to those required for development of the proposed Project. This alternative would construct the identified underground infiltration trenches but would likely be of a smaller size. In addition, preparation of a SWPPP and WQMP would be required for development of this alternative. Overall, consistent with the proposed Project, this alternative would result in less than significant impacts related to hydrology and water quality.

Mineral Resources

The Buildout of Existing Zoning Alternative would redevelop the 26.77-acre site that is currently utilized for oil extraction. This alternative would construct one new 298,373 SF manufacturing building on Parcel 1 and one 286,305 SF storage yard on Parcel 2. Similar to the proposed Project, this alternative would abandon and close out all existing oil wells onsite. As such, impacts to mineral resources from this alternative would be the same as the proposed Project. Therefore, impacts related to the loss of availability of a known mineral resource that is of value to the region and the residents of the state would be less than significant, which is consistent with the proposed Project.

Noise

Under this alternative, the 26.77-acre site would be redeveloped with one new 298,373 SF manufacturing building on Parcel 1 and one 286,305 SF storage yard on Parcel 2. The operation of this alternative would result in approximately 1418 (or 24 more) daily trips, 203 (or 73 more) AM peak hour trips and 221 (or 83 more) PM peak hour trips compared to the proposed Project. Therefore, this alternative would result in a slight increase in roadway noise when compared to the proposed Project and would increase noise-related impacts. As detailed in Section 5.8, Noise, in Table 5.8-8, *Traffic Noise Levels Without Proposed Project and With Proposed Project*, the proposed Project-related traffic noise increase range from 0.0 to 10.1 dBA CNEL; however, there are no sensitive receivers located in areas that would experience increases over 1.5 dBA. The four roadway intersections near sensitive receivers would have no increase (increase of 0.0) in traffic noise levels under the proposed Project.

A slight increase of 1.7 percent in traffic at sensitive receiver locations compared to the proposed Project from the Buildout of Existing Zoning Alternative would likely not result in this alternative being close to or exceeding the 1.5 dBA traffic noise level increase threshold. Therefore, traffic noise impacts from the Buildout of Existing Zoning Alternative to sensitive receptors would remain less than significant.

Short-term noise and vibration that would occur during construction of the Buildout of Existing Zoning Alternative would be consistent with what would occur from construction of the Project. Like the Project, long-term onsite operational noise would not expose nearby sensitive receivers to noise levels over the City's daytime noise standards. The proposed Project has less than significant noise impacts without mitigation. Overall, this alternative would result in similar noise-related impacts than those associated with the Project and impacts would remain less than.

Transportation

Under this alternative, the 26.77-acre site would be developed with one new 298,373 SF manufacturing building on Parcel 1 and one 286,305 SF storage yard on Parcel 2. Development under the Buildout of

Existing Zoning Alternative would reduce the total Project square footage by approximately 51 percent, or by 286,305 SF (by removing the proposed Building 2). The building would operate as 100 percent manufacturing. The operation of this alternative would result in approximately 1,418 (or 24 more) daily trips, 203 (or 73 more) AM peak hour trips and 221 (or 83 more) PM peak hour trips compared to the proposed Project.

The operation of this alternative would result in greater daily employee trips in comparison to the proposed Project because of the increase in manufacturing uses. The Project site is located within a SCAG Tier 1 Traffic Analysis Zone (TAZ) (TAZ 21832000). The TAZ is identified as being “Higher than City Baseline” for home-based work (HBW) trip VMT per employee per the *City of Santa Fe Springs Transportation Study Guidelines*. Therefore, consistent with the proposed Project, the Buildout of Existing Zoning Alternative would result in a significant and unavoidable impact related to VMT.

Tribal Cultural Resources

Under this alternative, the 26.77-acre site would be redeveloped with one 298,373 SF manufacturing building and one 286,305 SF storage yard. Consistent with the proposed Project, additional improvements onsite would include landscaping, utility connections, implementation of stormwater facilities, construction of a cul-de-sac driveway on Hawkins Street and pavement of parking areas and driveways. Areas planned for physical impact onsite would be identical to those required for development of the proposed Project. As a result, potential tribal cultural resource impacts would be similar to the Project due to grading and excavation required for development of the warehouse and require the same mitigation measures. Therefore, impacts from the Buildout of Existing Zoning Alternative would be similar to those of the proposed Project.

Utilities and Service Systems

Under this alternative, the 26.77-acre site would be redeveloped with one 298,373 SF manufacturing building and one 286,305 SF storage yard. Both the Project and this alternative would require installation of underground electric and communication lines that would connect to existing infrastructure which would also be undergrounded near the northern property line. Additionally, both the Project and this alternative would connect to the existing 6-inch natural gas line within Hawkins Street. Impacts associated with the provision of such facilities would be similar and would be less than significant upon compliance with existing regulatory requirements. Although impacts would be decreased under this alternative because one-half of the Project would be a storage yard that would demand less utility services, impacts would continue to be less than significant. Project.

8.8.2 Conclusion

Ability to Reduce Impacts

The Alternative Use and Buildout Alternative would eliminate the need for air quality mitigation measures. However, mitigation measures for geology and soils (paleontological resources), hazards and hazardous materials, and transportation would continue to be required for this alternative. Furthermore, additional mitigation measures related to operational air quality emissions would be required and may result in a significant and unavoidable impact.

This alternative would not reduce the impact level of any of the 11 environmental topics analyzed in this Draft EIR (see Table 8-2). Furthermore, impacts to and transportation would continue to be significant and unavoidable. In addition, operation air quality would be potentially significant under this alternative (and less than significant under the proposed Project).

Ability to Achieve Project Objectives

As shown in Table 8-3, below, the Alternative Use and Buildout Alternative would meet two of the Project objectives and partially meet two of Project objectives. This alternative would redevelop a property in the City of Santa Fe Springs with industrial uses, adding to its potential employment-generating uses and would attract new businesses and employment. Furthermore, the Alternative Use and Buildout Alternative would develop a speculative warehouse building within proximity to I-5 and I-605 that is compatible with other industrial buildings that were recently built or recently approved by the city. However, this alternative would not meet all of the Project objectives to the same extent as the proposed Project would, since the proposed Project would accomplish the same goals, but generally to a greater degree.

8.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative” when significant environmental impacts result from a proposed Project...

Additionally, State CEQA Guidelines Section 15126.6(3)(1) states:

The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Therefore, pursuant to CEQA, because the No Project/No Development Alternative has been identified as the Environmentally Superior Alternative, the next best Environmentally Superior Alternative would be Alternative 2: Reduced Project Alternative, which would involve developing the Project site with two speculative warehouse buildings. Building 1 would total be approximately 149,186 SF on the 585,782 SF (13.45-acre) Parcel 1, resulting in a FAR of 0.26. Building 2 be approximately 143,152 SF on the 570,462 SF (13.09-acre) Parcel 2, resulting in a FAR of 0.25. This alternative would result in lessened impacts in a part of 1 of the 11 environmental topics analyzed in this EIR by avoiding the need for mitigating construction air quality impacts. However, this alternative would be required to implement the same applicable mitigation measures regarding geology and soils (paleontological resources), hazards and hazardous materials, transportation, and tribal cultural resources, similar to the Project. Impacts to transportation would continue to be significant and unavoidable under this alternative. Moreover, the Reduced Project Alternative would not meet the Project objectives to the same extent as the proposed Project. Alternative 2 would have a reduction of 192 employees (50 percent) as compared to the proposed Project.

CEQA does not require the Lead Agency (the City of Santa Fe Springs) to choose the environmentally superior alternative. Instead, CEQA requires the City to consider environmentally superior alternatives, weigh those considerations against the environmental impacts of the proposed Project, and make findings that the benefits of those considerations outweigh the harm. Table 8-2 provides, in summary format, a comparison between the level of impacts for each alternative and the proposed Project. In addition, Table 8-3 provides a comparison of the ability of each of the alternatives to meet the objectives of the proposed Project.

Table 8-2: Impact Comparison of the Proposed Project and Alternatives

	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Project Alternative	Alternative 3: Alternative Use and Buildout Alternative
Air Quality	Less than significant with mitigation	Less than significant – Less than Project	Less than significant – Less than Project	Potentially significant – More than the Project
Energy	Less than significant	Less than significant – Less than Project	Less than significant – Less than Project	Less than significant – More than Project
Geology and Soils	Less than significant with mitigation (Paleontology)	No impact – Less than Project	Less than significant with mitigation – Same as Project	Less than significant with mitigation – Same as Project
Greenhouse Gases	Less than significant	Less than significant – Less than Project	Less than significant – Less than Project	Less than significant – More than the Project
Hazards and Hazardous Materials	Less than significant with mitigation	Less than significant – Less than Project	Less than significant with mitigation	Less than significant with mitigation – More than the Project
Hydrology and Water Quality	Less than significant	Less than significant – same as Project	Less than significant – Same as Project	Less than significant – Same as Project
Mineral Resources	Less than significant	No impact – Less than Project	Less than significant – Same as Project	Less than significant – Same as Project
Noise	Less than significant	Less than significant – Less than Project	Less than significant – Less than Project	Less than significant – More than the Project
Transportation	Significant and Unavoidable	Less than significant – Less than Project	Significant and Unavoidable – Same as Project	Significant and Unavoidable – Same as Project
Tribal Cultural Resources	Less than significant with mitigation	Less than significant – Less than Project	Less than significant with mitigation – Same as Project	Less than significant with mitigation – Same as Project
Utilities and Service Systems	Less than significant	No impact – Less than Project	Less than significant – Less than Project	Less than significant – Less than Project
Reduce Impacts of the Project?		Yes, to 10 environmental topics	Yes, to 1 environmental topic	No
Areas of Reduced Impact Level Compared to the Project		5	1	0

Table 8-3: Comparison of the Proposed Project and Alternatives' Ability to Meet Objectives

	Project	Alternative 1: No Project	Alternative 2: 50 Percent Reduced Project Alternative	Alternative 3: Buildout of Existing Zoning Alternative
1. To make efficient use of an underutilized property in the City of Santa Fe Springs by redeveloping it	Yes	No	Yes, but to a lesser extent	Yes, but to a lesser extent

	Project	Alternative 1: No Project	Alternative 2: 50 Percent Reduced Project Alternative	Alternative 3: Buildout of Existing Zoning Alternative
with a modern industrial warehouse that adds to its potential for employment-generating uses and that aligns with the City's General Plan and zoning designations.				
2. To redevelop an underutilized property with an industrial warehouse building near Interstate 5 and Interstate 605, to help meet demand for logistics business in the City and surrounding region.	Yes	No	Yes, but to a lesser extent	Yes, but to a lesser extent
3. To attract new business and employment to the City of Santa Fe Springs and thereby promote economic growth.	Yes	No	Yes, but to a lesser extent	Yes
4. To build an industrial warehouse project in the City of Santa Fe Springs that is compatible with the surrounding industrial and manufacturing uses that were recently built or recently approved for construction in the City of Santa Fe Springs.	Yes	No	Yes, but to a lesser extent	Yes

This page intentionally left blank.