Date:	January 5, 2022
Prepared by:	Renee Escario
To:	Jimmy Wong, Associate Planner, City of Santa Fe Springs
Project:	Florence Avenue Townhome Project
Subject:	**CEQA Review of the Proposed Modified Project**

1.0 Purpose and Scope

This document provides a review of the Modified Project that is being proposed by the project applicant in response to concerns expressed by members of the community about density, parking, traffic generation, and privacy that are documented in the Response to Comments chapter of the Final Mitigated Negative Declaration (MND). The Draft MND, Final MND, in conjunction with this CEQA Review of the Proposed Modified Project, serves as the environmental review for the Project.

Subsequent to circulation of the Draft MND and prior to adoption of the Final MND, the Project applicant revised the development proposal to the City. This CEQA Review evaluates the revised development proposal (Modified Project), as described herein.

The Modified Project proposes reducing the project by 9 residential units, from 63 units to 54 units, which is a 14.3 percent reduction. In addition, the proposed Modified Project increase the number of open parking spaces and limits all residential structures along the western portion of the site to only 2-story townhomes. This CEQA Review evaluates these modifications to determine if any new or substantially more severe environmental impacts would occur from implementation of the Modified Project that were not identified in the MND.

Pursuant to the provisions of the California Environmental Quality Act (Pub. Resources Code, Section 21000 et seq.) (CEQA) and the State CEQA Guidelines (Cal. Code Regs., tit. 14, Section 15000 et seq.), the City is the Lead Agency charged with deciding whether or not to approve the project with or without the proposed modifications. This CEQA Review addresses the potential environmental impacts associated with the proposed Modified Project and will be considered by the City during the project approval process, in tandem with the MND, all oral and written comments presented to the City, and all other documents comprising the project's administrative record.

2.0 Environmental Procedures

This CEQA Review has been prepared to determine if the proposed Modified Project would result in new or substantially increased environmental effects compared to those identified in the MND. This review focuses on the potential environmental impacts associated with the Modified Project that might cause a change in the conclusions of the MND, including significant new information related to new or increased adverse environmental effects. In other words, this document compares the environmental effects of the project as evaluated in the MND to those of the Modified Project and considers whether the proposed modifications would result in new or substantially more severe impacts than was disclosed in the MND.

Specifically, this document analyzes whether a reduction of 9 residential units (a 14.3 percent reduction), a reduction in the height of the proposed structures in the western side of the site, and an increase in the number of parking spaces would result in the new or substantially more severe impacts than were identified in the MND.

As detailed herein, implementation of the proposed Modified Project would not result in any new or substantially greater impacts and no new mitigation measures are required. Further, on the basis of these findings and the provisions of the State CEQA Guidelines, no further CEQA documentation is required for the modified multi-family residential project. As required by CEQA Guidelines section 15088.5(e) the analysis throughout this review provides substantial evidence to support these findings.

3.0 Modifications to the Original Project Description

The proposed Modified Project would reduce the number of residential units, the height of the residential structures along the western portion of the site and increase the number of open parking spaces.

The proposed modified site plan reduces unit count proposed from 63 units to 54 dwelling units, which is a reduction of 9 residential units (a 14.3 percent reduction). The residential structures along the western portion of the site would consist of seven 2-story attached townhomes, adjacent to the existing single-family residences to the west, and the remainder of the site would be developed with 47 3-story attached townhomes. This would result in a reduction in structure height along the western portion of the site from 35 feet to 23 feet 6 inches in height.

The Modified Project would increase the number of open parking spaces on the site from 22 open stalls for 63 residences to 34 open stalls for 54 residences. The open stalls in addition to the attached 2 car garage for each residence would result in a total of 2.63 parking spaces per dwelling unit, which exceeds the Municipal Code requirement of 2 spaces per residence.

The modified site plan results in a slight decrease in lot coverage, a slight increase in the amount of total open space per residential unit, and slight increase in building setback from the western site boundary. All other aspects of the proposed project would remain as originally proposed, including on-site circulation, types of recreation amenities, landscaping, walls, and utility provision. Table 1 provides a comparison between the Original Project as evaluated in the MND and the proposed Modified Project.

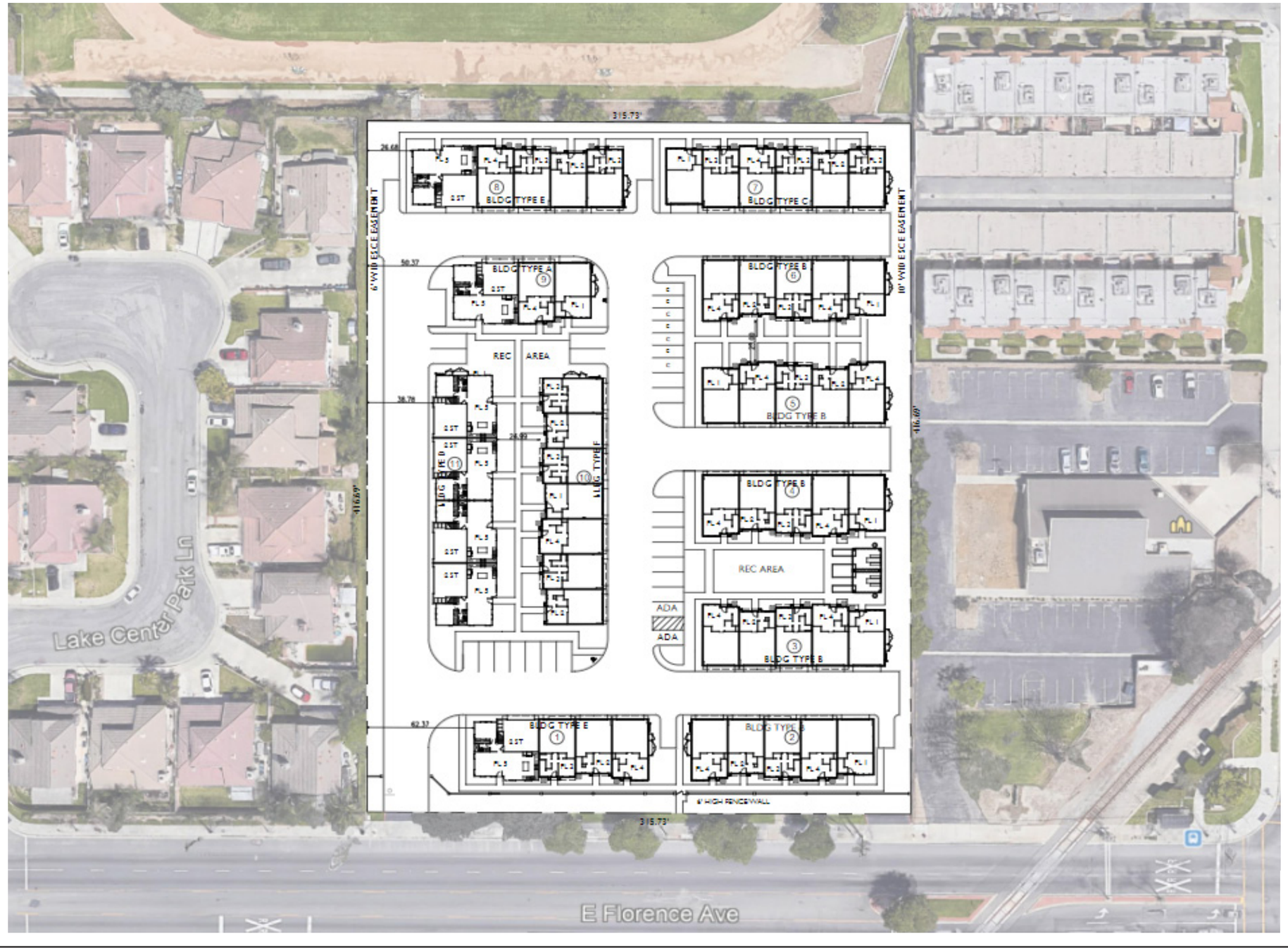
Table 1: Proposed Project Modifications

Project Characteristic	Original Project (per MND)	Modified Project	Change
Number of Units	63 units	54 units	-9 units
Density of Residences	21 units per acre	18 units per acre*	-3 units per acre
Residential Unit Mix	Plan 1: 2 bdr. 1,528 SF – 14 units Plan 2: 3 bdr. 1,640 SF – 13 units Plan 3: 3 bdr. 1,702 SF – 20 units Plan 4: 4 bdr. 1,801 SF – 16 units	Plan 1: 2 bdr. 1,528 SF – 8 units Plan 2: 3 bdr. 1,640 SF – 10 units Plan 3: 3 bdr. 1,702 SF – 14 units Plan 4: 4 bdr. 1,801 SF – 15 units Plan 5: 4 bdr. 2,130 SF – 7 units	Plan 1: – 6 units Plan 2: – 3 units Plan 3: – 6 units Plan 4: – 1 units Plan 5: + 7 units
Stories of Residential Structures	3 stories	2 and 3 stories	-1 story
Maximum Height of Residential Structures	35-feet	23-feet 6-inches	-11-feet 6-inches
Guest Parking*	22 spaces for 63 units (0.35 per unit)	34 spaces for 54 units (0.63 per unit)	+12 spaces (+0.28 per unit)
Total Open Space	31,600 SF (501 SF per unit)	30,470 SF (564 SF per unit)	+63 SF per unit
Lot Coverage	36.2%	35.0%	-1.2%
Building Western Setback	Between 22.06 feet to 62.37 feet	Between 26.68 feet to 57.80 feet	+4.57 to +4.62 feet

Notes: bdr = bedroom; SF = square feet

* In addition to 2 garage spaces per residence.

Modified Project Site Plan



Modified Site Plan 2-Story Elevation

LEFT ELEVATION

FRONT ELEVATION

RIGHT ELEVATION

REAR ELEVATION

N

Driveway View Rendering

N

4.0 Evaluation of Environmental Impacts

The evaluation of environmental impacts in this review compares the potential impacts of the proposed Modified Project to the conclusions of the MND. Mitigation measures referenced are from the Final MND Mitigation Monitoring and Reporting Program (MMRP) and would be applied to proposed Modified Project. This comparative analysis has been undertaken pursuant to the provisions of CEQA and the State CEQA Guidelines to identify the potential of new or increased impacts that were not previously identified in the MND.

4.1 Aesthetics

As described in Section 4.3.1 of the IS/MND, the Original Project would not result in impacts to scenic vistas and scenic highways and would have less than significant impacts related to visual character, lighting, and glare. As the Modified Project would be developed on the same site as the Original Project and would not result in larger or higher building structures, it would also not result in impacts to scenic vistas or scenic highways. Also, the Modified Project would result in a decreased development density and would be consistent with applicable General Plan and Municipal Code development standards. Additionally, the Modified Project would provide two-story units along the western portion of the project site, which would provide increased compatibility with the adjacent two-story residences and would not result in any impacts related to the visual character of the site. Due to the reduction in number of residences from the Modified Project, there would be fewer sources of exterior lighting that could create glare when compared to the Original Project. Due to the 11-foot 6-inch reduction of the height of the residential structures along the western side of the project site, the Modified Project would result in a reduction of shadows. Overall, due to the reduction in number of residential structures and height of residential structures along the western portion of the site, impacts related to aesthetics from the Modified Project would be less than those from the Original Project. No new or increased impacts related to aesthetics would occur from the Modified Project.

4.2 Agricultural and Forestry Resources

As described in Section 4.3.2 of the IS/MND, the Original Project would not result in impacts to farmland, agricultural resources, or forestry resources. As the Modified Project would be constructed on the same site as the Original Project, it would also result in no impacts to farmland, agricultural resources, or forestry resources. No new or increased impacts related to agricultural and forestry resources would occur from the Modified Project.

4.3 Air Quality

As described in Section 4.3.3 of the IS/MND, the Original Project would result in less than significant impacts related to air quality emissions. As the proposed Modified Project would result in 9 fewer residences than the Original Project, it would result in fewer stationary source emissions from residences and fewer daily vehicular trips than the Original Project, as further detailed in Section 4.17, *Transportation*. The decrease in vehicle trips from the Modified Project would correlate with less vehicular source emissions, which generate a majority of the emissions from both the Original and Modified Project. Therefore, air quality emissions would decrease with implementation of the Modified Project in comparison to the Original Project. Consistent with the Original Project, the Modified Project would result in less than significant impacts related to air quality, and no new or increased impacts would occur from the Modified Project.

4.4 Biological Resources

As discussed in Section 4.3.4 of the IS/MND, the Original Project would result in no impacts to special status species, native communities, wetlands, riparian habitat, biological ordinances, or Habitat Conservation Plans. Due to the existing onsite trees, the Original Project would require implementation of Mitigation Measure BIO-1, which requires conduct of a nesting bird survey if commencement of vegetation clearing occurs

between February 1 and September 15. With implementation of Mitigation Measure BIO-1, impacts from the Original Project related to nesting birds would be less than significant. As the Modified Project would be constructed on the same site as the Original Project, it would also result in no impacts to special status species, native communities, wetlands, riparian habitat, biological ordinances, or Habitat Conservation Plans. Like the Original Project, the Modified Project would be required to implement Mitigation Measure BIO-1 to limit impacts to nesting birds. Overall, the Modified Project would result in the same impacts as the Original Project to biological resources. No new or increased impacts related to biological resources would occur from the Modified Project.

4.5 Cultural Resources

As discussed in Section 4.3.5 of the IS/MND, the Original Project would result in less than significant impacts related to historical resources and human remains. Due to the potential for project grading to encroach into native soils, which could potentially contain archaeological resources, Mitigation Measure CUL-1 is included to provide procedures for inadvertent discoveries. With implementation of Mitigation Measure CUL-1 the IS/MND concluded that impacts to archaeological resources would be less than significant. As the Modified Project would be constructed on the same site as the Original Project, it would also result in less than significant impacts related to historical resources, archaeological resources, and human remains with implementation of Mitigation Measure CUL-1. Overall, the Modified Project would result in the same impacts as the Original Project related to cultural resources. No new or increased impacts related to cultural resources would occur from the Modified Project.

4.6 Energy

As discussed in Section 4.3.6 of the IS/MND, the Original Project would result in less than significant impacts related to energy usage and no impacts related to conflict with a plan for renewable energy or energy efficiency. Due to the decrease in the number of residences proposed in the Modified Project, the Modified Project would use less electricity and natural gas than the Original Project. Furthermore, the reduction of residences would result in a reduction in daily vehicular trips associated with the Modified Project, which would result in a reduced amount of gasoline used. Therefore, the Modified Project would result in less energy consumption than the Original Project. Consistent with the Original Project, the Modified Project would be implemented in compliance with CalGreen/Title 24 and other applicable regulations related to energy efficiency and energy use. Thus, no new or increased impacts related to energy would occur from the Modified Project.

4.7 Geology and Soils

As discussed in Section 4.3.7 of the IS/MND, the Original Project would result in no impacts related to fault rupture, landslides, and septic tanks; and less than significant impacts related to other geological risks and soil erosion with adherence to existing regulations. As the Modified Project would be constructed on the same site as the Original Project, it would also result in no impacts related to fault rupture, landslides, and septic tanks; and less than significant impacts related to other geological risks and soil erosion. The Modified Project would result in the same impacts as the Original Project related to geology and soils. No new or increased impacts related to geology and soils would occur from the Modified Project.

4.8 Greenhouse Gas Emissions

As discussed in Section 4.3.8 of the IS/MND, the Original Project would result in less than significant impacts related to greenhouse gas (GHG) emissions and conflict with an applicable GHG reduction plan. As the proposed Modified Project would result in 9 fewer residences than the Original Project, it would result in fewer stationary source GHG emissions from residences. Also, the reduction in residences would generate fewer daily vehicular trips than the Original Project, as further detailed in Section 4.17, *Transportation*. The decrease in vehicle trips would correlate with a decrease in vehicular source GHG emissions, which generate

a majority of the GHG emissions from both the Original and Modified Project. Consistent with the Original Project, impacts related to GHG emissions would be less than significant. No new or increased impacts related to GHG emissions would occur from the Modified Project.

4.9 Hazards and Hazardous Materials

As discussed in Section 4.3.9 of the IS/MND, the Original Project would result in less than significant impacts related to the disposal of hazardous materials, release of hazardous materials, and emergency evacuation plans and no impacts related to a hazardous material site, airport safety hazards, or wildfire. As the Modified Project would be constructed on the same site as the Original Project, it also would result in no impacts related to a hazardous material site, airport safety hazards, or wildfire. Also, because the Modified Project would be constructed consistent with that of the Original Project and would result in 9 fewer residences that could potentially utilize limited hazardous materials, the Modified Project would result in less than significant impacts related to the disposal of hazardous materials, release of hazardous materials, and emergency evacuation plans. Overall, the Modified Project would result in the same less than significant impacts as the Original Project related to hazards and hazardous materials. No new or increased impacts related to hazards and hazardous materials would occur from the Modified Project.

4.10 Hydrology and Water Quality

As discussed in Section 4.3.10 of the IS/MND, the Original Project would result in less than significant impacts related to water quality, drainage, and groundwater recharge and would result in no impacts related to project inundation and conflict with a water quality control plan or sustainable groundwater management plan. Since the Modified Project would be constructed on the same site and because no changes are proposed to the overall drainage plan, the Modified Project would result in less than significant impacts related to water quality, drainage, and groundwater recharge and no impacts related to project inundation and conflict with applicable plans would occur. Overall, the Modified Project would result in the same impacts as the Original Project related to hydrology and water quality. No new or increased impacts related to hydrology and water quality would occur from the Modified Project.

4.11 Land Use and Planning

As discussed in Section 4.3.11 of the IS/MND, the Original Project would result in no impacts related to the division of an established community and less than significant impacts related to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As the Modified Project would be developed on the same site as the Original Project, provides the same residential land uses, within the same general site layout it would not divide an established community. Additionally, consistent with the Original Project, the Modified Project would require a General Plan Amendment to change the land use to Multiple Family Residential and a zone change to change the zoning designation of the site to R3-Multiple Family Residential. The Modified Project would develop the site at a density of 17.88 dwelling units per acre, which would be less than the allowable density of 21.8 dwelling units per acre within the Multiple Family Residential land use designation. Additionally, the Modified Project would be consistent with the development standards associated with the R3 zone. Therefore, the Modified Project would be consistent with the proposed General Plan designation and zoning and impacts would be less than significant. Overall, the Modified Project would result in the same less than significant impacts as the Original Project related to land use and planning. No new or increased impacts related to land use and planning would occur from the Modified Project.

4.12 Mineral Resources

As discussed in Section 4.3.12 of the IS/MND, the Original Project would result in no impacts related to mineral resources. As the Modified Project would be developed on the same site as the Original Project, it

would also result in no impacts to mineral resources. No new or increased impacts related to mineral resources would occur from the Modified Project.

4.13 Noise

As discussed in Section 4.3.13 of the IS/MND, the Original Project would result in no impacts related to noise from an airport. Also, with implementation Mitigation Measure NOI-1, which requires the construction of noise barriers to reduce noise levels from the existing rail line to the project site, the IS/MND found that impacts related to noise would be less than significant. With implementation of Mitigation Measure NOI-2, which restricts operation of large bulldozers within 20 feet of any offsite residence, the IS/MND found that impacts related to vibration would be less than significant. As the Modified Project would be constructed on the same site as the Original Project in the same manner, it would result in no impacts related to air traffic noise but would require the same mitigation outlined in the IS/MND to reduce impacts from the rail line and to reduce construction vibration on offsite receptors. Consistent with the Original Project, with implementation of Mitigation Measures NOI-1 and NOI-2, impacts related to noise and vibration from the Modified Project would be less than significant. No new or increased impacts related to noise would occur from the Modified Project.

4.14 Population and Housing

As discussed in Section 4.3.14 of the IS/MND, the Original Project would result in less than significant impacts related to population growth and no impacts related to displacement of existing housing. As discussed in the IS/MND, the Original Project would result in approximately 214 new residents. Based on the City average of 3.39 persons per household, the Modified Project of 9 fewer residences would result in approximately 183 new residents. The Modified Project would result in approximately 31 fewer residents compared to the Original Project. As such, the proposed Modified Project, would not result in an increase in population growth and would not result in displacement of existing homes. No new or increased impacts related to population and housing would occur from the Modified Project.

4.15 Public Services

As discussed in Section 4.3.15 of the IS/MND, the Original Project would result in less than significant impacts to fire services, police protection, schools, parks, and other public services. As the Modified Project would result in 9 fewer residences, a decreased demand for public services including fire services, police protection, schools, and parks would occur in comparison to the Original Project. Thus, consistent with the Original Project, impacts related to public services would be less than significant. No new or increased impacts related to public services would occur from the Modified Project.

4.16 Recreation

As discussed in Section 4.3.16 of the IS/MND, the Original Project would result in less than significant impacts related to use of existing parks and construction or expansion of recreational facilities. As the Modified project would result in 9 fewer residences, and therefore, would result in less demand for existing parks and recreational facilities than the Original Project. Also, the Modified Project includes 27,330 square feet of common open space, which is 564 square feet per unit, which is 63 square feet more per unit than the 501 square feet per unit included in the Original Project. Therefore, an increase in open space is provided by the Modified Project in comparison to the Original Project. Impacts related to construction of recreation facilities would be consistent with those analyzed in the IS/MND. Overall, consistent with the Original Project, the Modified Project would result in less than significant impacts related to recreation. No new or increased impacts related to recreation would occur from the Modified Project.

4.17 Transportation

As discussed in Section 4.3.17 of the IS/MND, the Original Project would result in less than significant impacts related to the circulation system, vehicle miles traveled (VMT), and street design or incompatible uses and would result in no impacts related to emergency access. As detailed, the Original Project would result in approximately 343 daily vehicular trips. Because the Modified Project would result in 9 fewer residences, a reduction in vehicular trips would occur in comparison to the Original Project. Using a daily trip rate of 5.440 per unit, the Modified Project would result in approximately 294 daily trips. As such, the Modified Project result a less than significant impact related to intersection operations. Also, with fewer vehicular trips, the Modified Project would result in less than significant impacts to VMT. As the Modified Project would be constructed in a similar manner and would feature driveway layouts consistent with the Original Project, it would result in less than significant impacts to hazardous design and no impacts to emergency access. Overall, the Modified Project would result in fewer vehicular trips than the Original Project and would have impacts related to transportation that are less than significant. No new or increased impacts related to transportation would occur from the Modified Project.

4.18 Tribal Cultural Resources

As discussed in Section 4.3.18 of the IS/MND, the Original Project would result in no impacts to historical resources. Additionally, with incorporation of Mitigation Measure TCR-1, which requires Native American monitoring, impacts to tribal cultural resources would be less than significant. As the Modified Project would be constructed on the same site and in a similar manner to the Original Project, it would also require incorporation of Mitigation Measure TCR-1. With implementation of Mitigation Measure TCR-1, impacts to tribal cultural resources would be less than significant. Thus, the Modified Project would result in the same impacts as the Original Project related to tribal cultural resources. No new or increased impacts related to tribal cultural resources would occur from the Modified Project.

4.19 Utilities and Services Systems

As discussed in Section 4.3.19 of the IS/MND, the Original Project would result in less than significant impacts to wastewater, stormwater, water supplies, and solid waste generation and would result in no impacts related to conflict with solid waste reduction plans. As the Modified Project includes 9 fewer residences and would be constructed in a similar manner to the Original Project, the Modified Project would not result in any changes to water or wastewater treatment facilities and impacts would be less than significant. Based on the water use target of 119 gallons per capita per day, the Modified Project would result in the consumption of 21,117 gallons of water per day, which is less consumption than analyzed in the IS/MND. Based on the wastewater generation factor of 156 gallons of wastewater per day per unit, the Modified Project would result in the generation of 8,424 gallons of wastewater per day, which is less than what was analyzed in the IS/MND. Based on the solid waste generation factor of 0.41 tons per resident per year, the Modified Project would result in 75.03 tons of solid waste per year, which is less than what was analyzed in the IS/MND. As such, consistent with the Original Project, the Modified Project would result in less than significant impacts related to water supplies, wastewater generation, and solid waste generation. No new or increased impacts related to utilities and service systems would occur from the Modified Project.

4.20 Wildfire

As discussed in Section 4.3.20 of the IS/MND, the Original Project would result in no impacts related to wildfire. As the Modified Project would be developed on the same site as the Original Project, it would also result in no impacts to wildfire. No new or increased impacts related to wildfire would occur from the Modified Project.