

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.

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