

NORTHWEST CORNER OF TELEGRAPH AND SANTA FE SPRINGS

SCH NO. 2024050495

Final ENVIRONMENTAL IMPACT REPORT

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

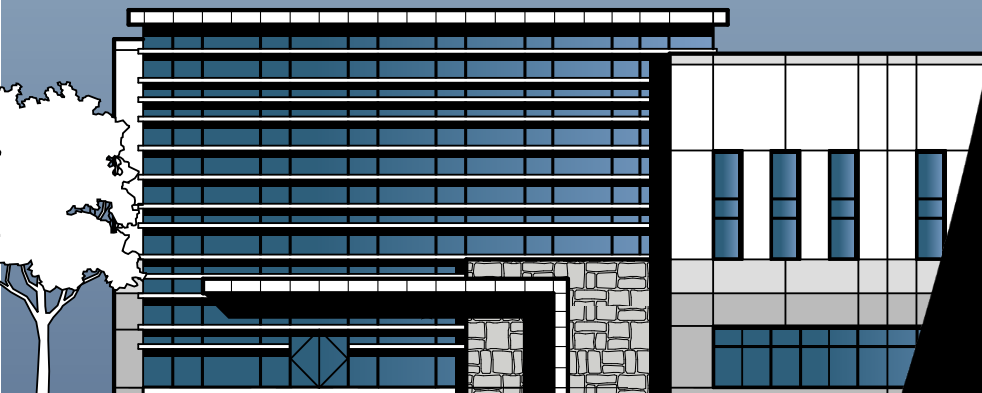
February 2025

Prepared by

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1. Introduction

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

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

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

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

1.1 FORMAT OF THE FINAL EIR

The following chapters are contained within this document:

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

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

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

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

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

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

1.2 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

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

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

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

2. Response to Comments

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

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

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

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

Table 2-1: Comments Received on the DEIR

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

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

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

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

Robert C. Ferrante

Chief Engineer and General Manager

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

December 30, 2024

Ref. DOC 7377389

VIA EMAIL jimmywong@santafesprings.org

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

Dear Mr. Wong:

Second Response to Northwest Corner of Telegraph and Santa Fe Springs

The Los Angeles County Sanitation Districts (Districts) received a Notice of Availability (NOA) of a Draft Environmental Impact Report (DEIR) for the subject project located in the City of Santa Fe Springs on December 2, 2024. Previous comments submitted by the Districts in correspondence dated June 6, 2024 (copy enclosed) still apply to the subject project with the following updated information: A1.1

1. **Section 4.4.11 Utilities and Service Systems**, stated that the wastewater generated within the City of Santa Fe Springs will be treated by the Los Coyotes Water Reclamation Plant and the Long Beach Water Reclamation Plant. Please note that the Los Coyotes Water Reclamation Plant and the A.K. Warren Water Resource Facility (formerly known as the Joint Water Pollution Control Plant) in the City of Carson will treat the wastewater generated within the City of Santa Fe Springs. Also, as indicated in the June 6, 2024 response letter, the wastewater generated by the proposed project will be treated at the Los Coyotes Water Reclamation Plant. A1.2
2. All other information concerning Districts' facilities and sewerage service contained in the document is current. A1.3

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2742, or phorsley@lacsd.org. A1.4

Very truly yours,

Patricia Horsley

Patricia Horsley
Environmental Planner
Facilities Planning Department

PLH:plh

Enclosure

DOC 7392788.D18



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

Robert C. Ferrante
Chief Engineer and General Manager

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

June 6, 2024

Ref. DOC 7227213

VIA EMAIL jimmywong@santafesprings.org

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

Dear Mr. Wong:

NOP Response to NWC Telegraph and Santa Fe Springs

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

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

DOC 7241280.D18

Mr. Jimmy Wong

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June 6, 2024

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

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

Very truly yours,

Patricia Horsley

Patricia Horsley
Environmental Planner
Facilities Planning Department

PLH:plh

cc: A. Schmidt
A. Howard

DOC 7241280.D18

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

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

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

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

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

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

5.11.3.2 Wastewater Services Environmental Setting

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

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

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

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

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

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

South Coast Air Quality Management District

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

SENT VIA E-MAIL:

January 10, 2025

jimmywong@santafesprings.org

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

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

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

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

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

A2.1

South Coast AQMD Staff's Comments

Cumulative Impacts during Operation

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

A2.2

¹ Draft EIR, Page 8.

² *Ibid* Page 141.

³ *Ibid* Page 284.

⁴ *Ibid* Page 7.

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January 10, 2025

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

A2.2
cont.

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

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

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

A2.3

⁵ *Ibid* Page 91.

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

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

A2.3
cont.

South Coast AQMD Air Permits and Role as a Responsible Agency

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

A2.4

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

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

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

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

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

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

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

¹⁴ South Coast AQMD. Rule 1110.2 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

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

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

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

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

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

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

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

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

A2.4
cont.

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

Conclusion

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

A2.5

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

A2.6

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

Jimmy Wong

5

January 10, 2025

SW:SG

LAC241204-02

Control Number

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 7
 100 S. MAIN STREET, MS 16
 LOS ANGELES, CA 90012
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Making Conservation
 a California Way of Life

January 13, 2025

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

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

Dear Jimmy Wong:

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

A3.1

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

VMT

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

A3.2

Mitigation Measures:

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

Jimmy Wong
January 13, 2025
Page 3 of 3

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

A3.7
cont.

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

A3.8

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

A3.9

Sincerely,



Anthony Higgins
Acting LDR/CEQA Branch Chief

cc: State Clearinghouse

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

Jimmy Wong
January 13, 2025
Page 2 of 3

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

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

A3.3

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

Complete Streets

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

A3.4

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

A3.5

A3.6

A3.7

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

January 8, 2025

Advocates for the Environment

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

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



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

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

Dear Mr. Wong:

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

O1.1

The City Should Require the Project to be Net-Zero

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

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

O1.2

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

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

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

O1.2
cont.

CEQA GHG Significance Analysis

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

O1.3

The Chosen Threshold Is Not Supported by Substantial Evidence

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

O1.4

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

O1.4
cont.

The City Cannot Solely Rely on the SCAQMD's Recommendation

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

O1.5

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

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

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

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

O1.6

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

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

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

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

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

O1.6
cont.

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

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

O1.7

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

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

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

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

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very different from the mix of projects the SCAQMD analyzed when it decided that a 10,000 MTCO_{2e} threshold would capture 90% of GHG emissions within their district.

O1.7
cont.

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

The Threshold is invalid because it is not aligned with the goals of the California Air Resources Board (CARB), which is the governing authority for the regulations of GHGs in California.⁶ CARB developed the 2022 Scoping Plan, which emphasizes that “any delays in action or insufficient action are a threat to public health and the environment.” (2022 Scoping Plan, p. 22.) It also specifies that all of the actions in the 2022 Scoping Plan are necessary to achieve climate goals. (2022 Scoping Plan, p. 11.) Accordingly, if the Project is any of the specified actions in the 2022 Scoping Plan from being carried out without delay, then it will be inconsistent with the 2022 Scoping Plan. A numeric threshold, particularly one as large as 10,000 MTCO_{2e}, does not require that any certain measures are achieved. Therefore, staying under the threshold would not mean that the Project would adhere to the measures in the 2022 Scoping Plan in a timely manner.

O1.8

The Threshold Does Not Comply with SB 32

Only two of California's air districts (Bay Area and Sacramento) have created thresholds which address SB 32's reduction goal of GHG emissions 40% below 1990 levels by 2030. (California Air Resources Board 2022 Climate Change Scoping Plan, Appendix D, p. 26, footnote 67.) All the other thresholds adopted by air quality management districts, including the 10,000 MTCO_{2e} threshold recommended for industrial projects by the SCAQMD, are not consistent with current environmental policy in California. Consequently, the chosen Threshold is an outdated threshold not supported by substantial evidence.

O1.9

The EIR's GHG Analysis was an Inadequate Informational Document

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

O1.10

Here, the Project's annual emissions were estimated to be 9,006 MTCO_{2e}, which were determined to be less than significant because of the exceedingly large chosen threshold of

O1.11

⁶ Assembly Bill 32, known as the Global Warming Solutions Act of 2006, mandated CARB to set and enforce GHG emissions standards across the state.

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

O1.11
cont.

Consistency with Identified Applicable Plans

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

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

O1.12

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

The DEIR Should Have Analyzed All Applicable Plans

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

O1.13

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

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

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

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

O1.13
cont.

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

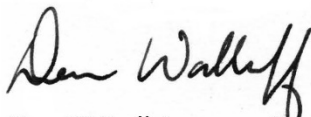
Conclusion

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

O1.14

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

Sincerely,



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

5.4.4 Thresholds of Significance

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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3. Revisions to the Draft EIR

3.1 INTRODUCTION

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

3.2 CHANGES TO THE DRAFT ENVIRONMENTAL IMPACT REPORT

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

Section 1.0, Executive Summary

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

1.1 Project Location

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

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

Section 3.0, Project Description

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

3.2 Project Location

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

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

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

Parking and Loading Docks

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

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

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

3.6 Discretionary Approvals and Permits

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

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

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

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

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

Section 4.0, Environmental Setting

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

Wastewater

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

Section 5.4, Greenhouse Gas Emissions

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

5.4.4 Thresholds of Significance

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

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

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

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

Section 5.5, Hazards and Hazardous Materials

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

5.5.8 Existing Regulations and Plans, Programs, or Policies

Plans, Programs, or Policies

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

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

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

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

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

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

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

Section 5.10, Tribal Cultural Resources

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

5.10.6 Environmental Impacts

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

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

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

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

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

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

5.10.7 Cumulative Impacts

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

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

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

5.10.8 Existing Regulations and Plans, Programs, and Policies

Plans, Programs, or Policies

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

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

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

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

5.10.10 Mitigation Measures

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

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

5.10.11 Level of Significance After Mitigation

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

Section 5.11, Utilities and Service Systems

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

5.11.3.2 Wastewater Services Environmental Setting

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

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

5.11.6.5 Electric Power, Natural Gas, and Telecommunications Environmental Impacts

Electric Power, Natural Gas, and Telecommunications Cumulative Impacts

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

4. Mitigation Monitoring and Reporting Summary

4.1 INTRODUCTION

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

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

4.2 MITIGATION MONITORING AND REPORTING PROGRAM

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

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

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Table 4-1: Mitigation Monitoring and Reporting Program

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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