Northwest Corner of Telegraph and Santa Fe Springs

Initial Study

Lead Agency:
City of Santa Fe Springs
11710 Telegraph Road
Santa Fe Springs, CA 90670

Project Applicant:
Bridgeland Resources, LLC
109 North Post Oak Lane, Suite 230
Houston, TX 77024

CEQA Consultant:
EPD SOLUTIONS, INC
3333 Michelson Drive, Suite 500
Irvine, CA 92612

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Acronym List

A-P	Alquist-Priolo Earthquake Fault Zoning Act
AQMP	Air Quality Management Plan
AB	Assembly Bill
APN	Assessor's Parcel Numbers
BMPs	Best Management Practices
CARB	California Air Resources Board
CBC	California Building Code
CEQA	California Environmental Quality Act
CFC	California Fire Code
EIR	Environmental Impact Report
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Maps
GHG	Greenhouse Gas
GP	General Plan
GP EIR	General Plan EIR
LHMP	Local Hazard Mitigation Plan
MBTA	Migratory Bird Treaty Act
MSHCP	Multi-Species Habitat Conservation Plan
NPDES	National Pollutant Discharge Elimination System
NAHC	Native American Heritage Commission
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCAG	Southern California Association of Governments
SWPPP	Stormwater Pollution Prevention Plan
TPZ	Timberland Production Zone
USFWS	United States Fish and Wildlife Service
USGS	United States Geologic Survey
WQMP	Water Quality Management Plan

1. INTRODUCTION

1.1. PURPOSE OF THE INITIAL STUDY

This Initial Study has been prepared in accordance with the following:

- California Environmental Quality Act (CEQA) of 1970 (Public Resources Code Sections 21000 et seq.); and
- Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines) (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000 et seq.) as amended and approved on December 28, 2018.

Pursuant to CEQA, this Initial Study has been prepared to analyze the potential for significant impacts on the environment resulting from implementation of the proposed Project, described in greater detail in Section 3.0, *Project Description*. As required by State CEQA Guidelines Section 15063, this Initial Study is a preliminary analysis prepared by the Lead Agency, the City of Santa Fe Springs, to determine if a Mitigated Negative Declaration or an Environmental Impact Report (EIR) is required to evaluate the potential environmental impacts associated with the Project.

This Initial Study informs the City of Santa Fe Springs decision-makers, affected agencies, and the public of potentially significant environmental impacts associated with the implementation of the Project. A "significant effect" or "significant impact" on the environment means "*a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project*" (State CEQA Guidelines Section15382).

Given the Project's broad scope and level of detail, combined with previous analyses and current information about the site and environs, the City's intent is to adhere to the following CEQA principles:

- Provide meaningful early evaluation of site planning constraints, service and infrastructure requirements, and other local and regional environmental considerations. (Public Resources Code Section 21003.1)
- Encourage the applicant to incorporate environmental considerations into project conceptualization, design, and planning at the earliest feasible time. (State CEQA Guidelines Section 15004[b][3])
- Specify mitigation measures for reasonably foreseeable significant environmental effects and commit the City and applicant to future measures containing performance standards to ensure their adequacy when detailed development plans and applications are submitted. (State CEQA Guidelines Section 15126.4)

1.2. DOCUMENT ORGANIZATION

This Initial Study includes the following sections:

Section 1. Introduction

Provides information about CEQA and its requirements for environmental review and explains that an Initial Study was prepared to evaluate the proposed Project's potential impact to the physical environment, and to determine if an EIR is required.

Section 2. Environmental Setting

Provides information about the proposed Project's location.

Section 3. Project Description

Includes a description of the proposed Project's physical features and characteristics.

Section 4. Environmental Checklist

Includes the Environmental Checklist from Appendix G of the State CEQA Guidelines and evaluates the proposed Project's potential to result in significant adverse effects to the physical environment and identifies if an EIR is required, and if one is, what environmental topics need to be analyzed in the EIR.

2. ENVIRONMENTAL SETTING

2.1. PROJECT LOCATION

The proposed NWC Telegraph and SFS Project (the 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. 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 and surrounding area is shown in Figure 2-1, *Regional Location* and Figure 2-2, *Local Vicinity*.

2.2. EXISTING PROJECT SITE

The Project site consists of one parcel encompassing approximately 26.77 acres and is identified by Assessor's Parcel Number (APN) 8005-015-051. The site currently is heavily disturbed and contains one, single-story 3,310 SF office building on the western edge of the property and a 1,282 SF canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. The site contains over 100 active, plugged, idle, and/or cancelled oil wells, with six jacks along with tanks, pipes, and associated infrastructure. The Project site is relatively flat and contains multiple ornamental trees and shrubs.

The site is currently accessible via three driveways—one driveway on Telegraph Road and two driveways on Santa Fe Springs Road. The Project site's existing conditions are shown in Figure 2-3, *Aerial View*, and Figure 2-4, *Existing Site Photos*.

2.3. EXISTING GENERAL PLAN LAND USE AND ZONING DESIGNATIONS

The Project site has a General Plan land use designation of Industrial, as shown in Figure 2-5, *Existing General Plan Land Use*, and a zoning designation of Heavy Manufacturing (M-2), as shown in Figure 2-6, *Existing Zoning*. The Industrial land use designation is intended to provide locations for general industrial, manufacturing, outdoor storage, and logistic activities at a maximum floor area ratio (FAR) of 0.75. The M-2 zone district provides sites for heavy industrial uses, oil and gas drilling, select manufacturing operations, salvage operations, automobile and truck services, and similar compatible uses (Santa Fe Springs Municipal Code Section 155.241). Warehouse uses are permitted within the M-2 zone.

2.4. SURROUNDING LAND USES

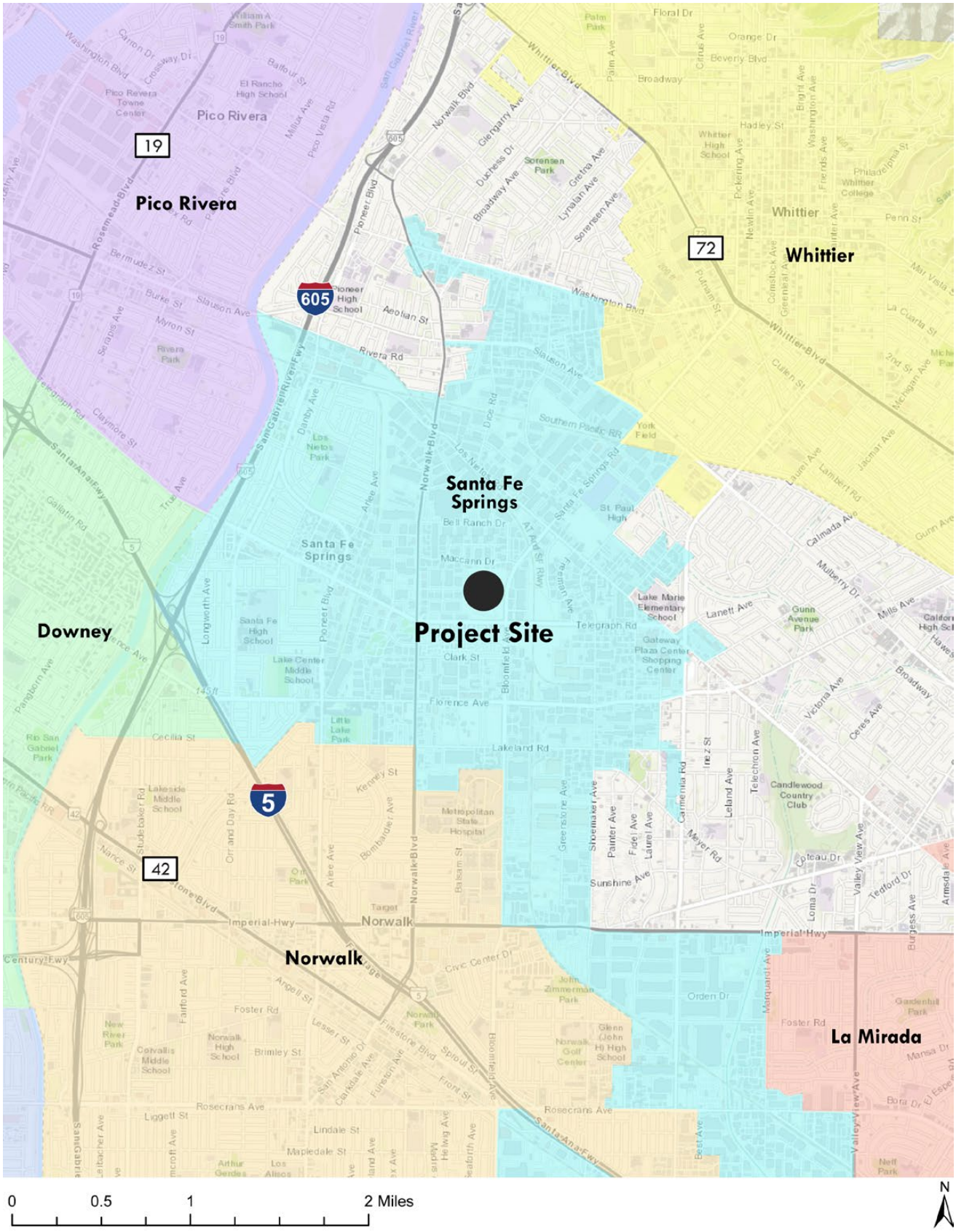
The surrounding land uses are described in Table 2-1 along with the General Plan land use and zoning designations.

Table 2-1: Surrounding Existing Land Use and Zoning Designations

	Existing Land Use	City General Plan Designation	City Zoning Designation
North	Industrial development	Industrial	Heavy Manufacturing (M-2)
West	Industrial development	Industrial and Light Industrial	Light Industrial (M-1) and Heavy Manufacturing (M-2)
South	One industrial building, oil and gas extraction, followed by Telegraph Road	Industrial, Light Industrial and Downtown	Light Industrial (M-1), Heavy Manufacturing (M-2) and Mixed-Use – Downtown (MU-DT)

	Existing Land Use	City General Plan Designation	City Zoning Designation
East	Oil and gas extraction, followed by Santa Fe Springs Road and industrial development	Industrial	Heavy Manufacturing (M-2)

Regional Location



NWC Telegraph and SFS
City of Santa Fe Springs

Figure 2-1

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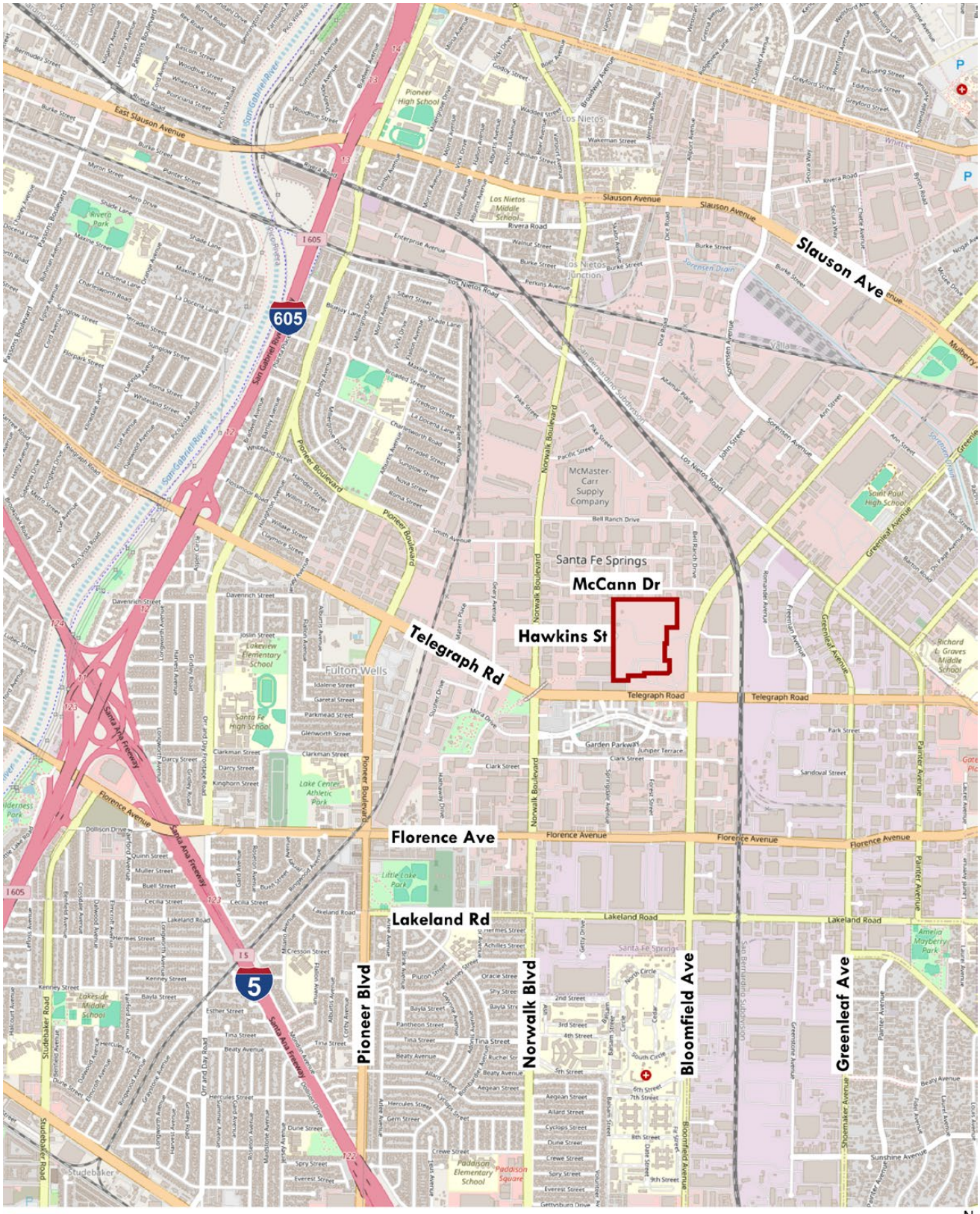
Local Vicinity



NWC Telegraph and SFS
City of Santa Fe Springs

Figure 2-2

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Aerial View

NWC Telegraph and SFS
City of Santa Fe Springs

Figure 2-3

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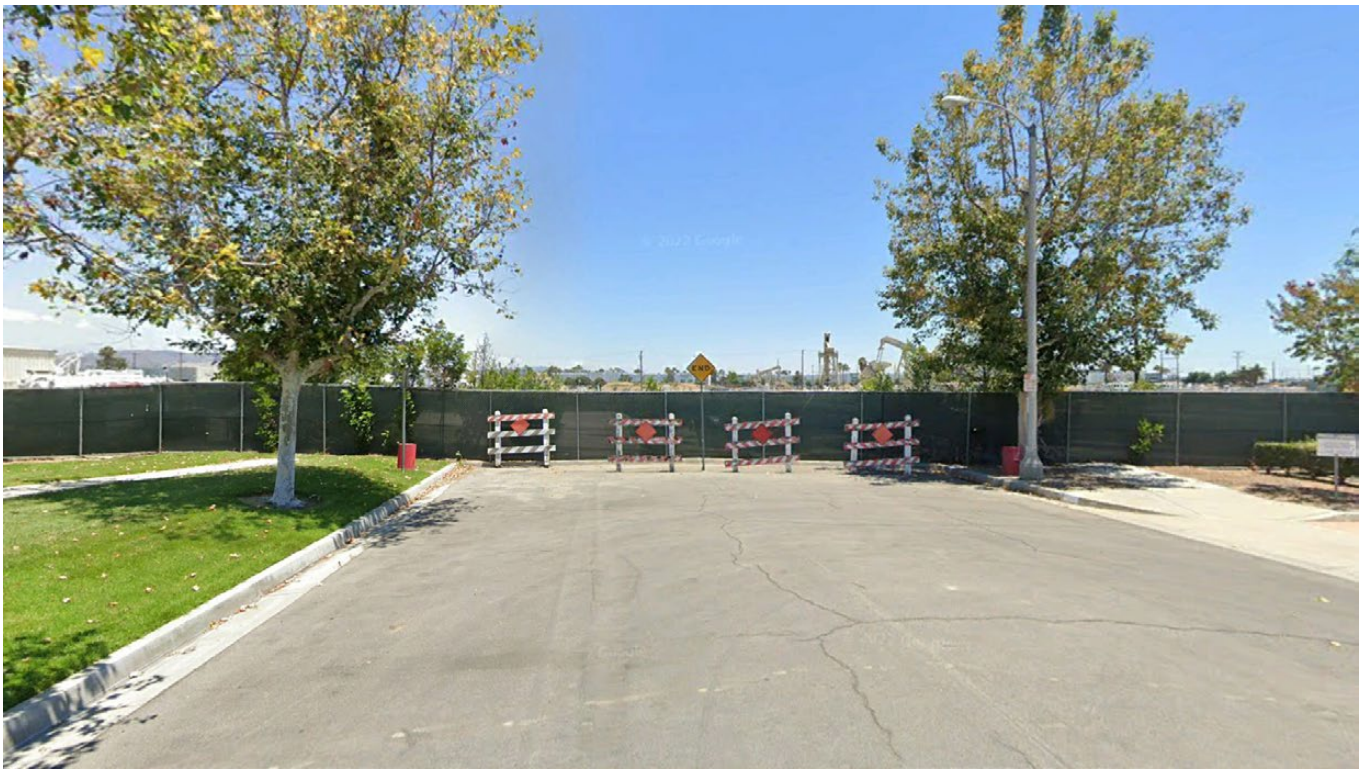
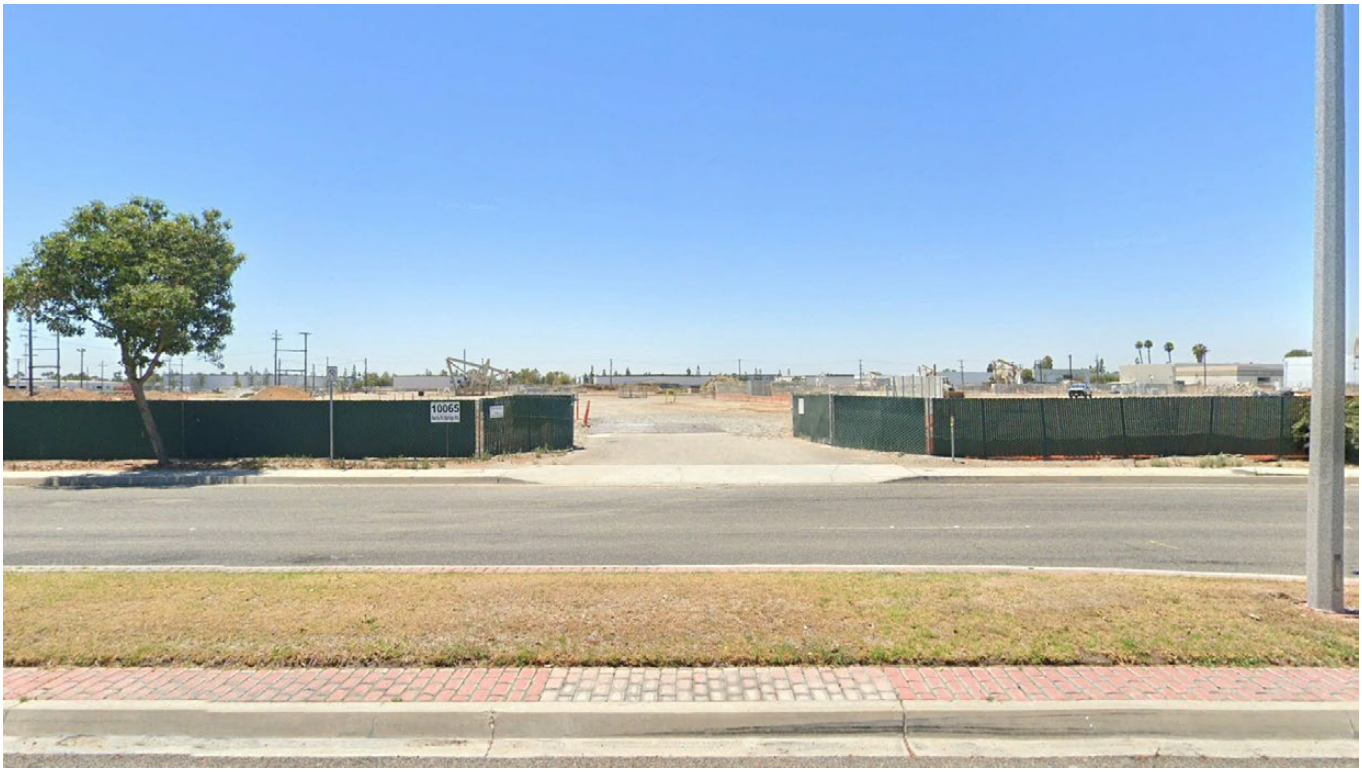
Site Photos



View of the site from Hawins St on the west side of the project site.



Access to the project site from the east side of site on Santa Fe Springs Rd.

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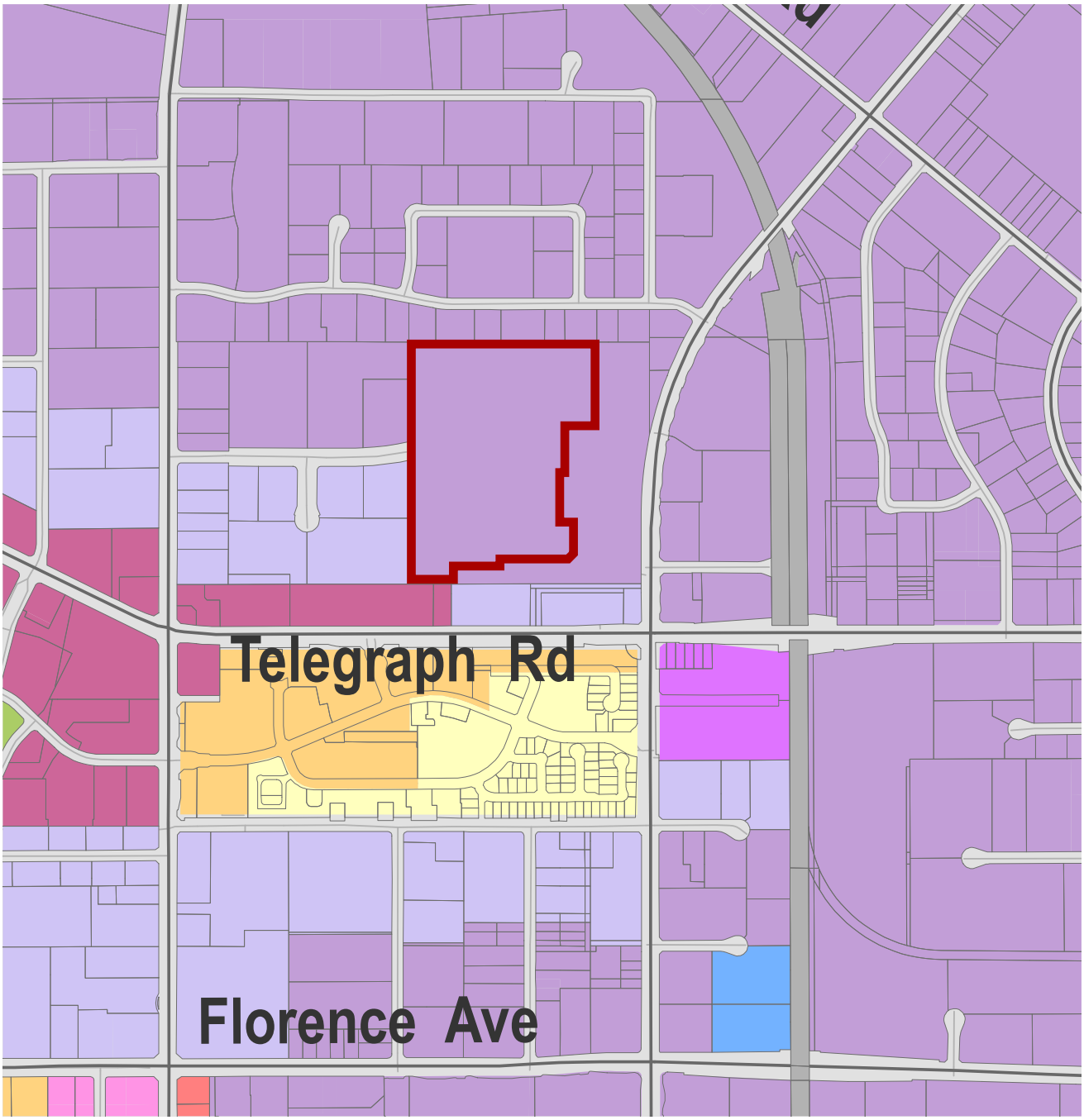
Existing General Plan Land Use



Project Site
Low Density Residential (9 du/ac)
Medium Density Residential (25 du/ac)
High Density Residential (40 du/ac)
Commercial
Freeway Commercial
Downtown (40 du/ac)
Mixed Use (40 du/ac)
Mixed Use TOD (60 du/ac)
Business Park
Light Industrial
Industrial
Public Facilities
Parks and Open Space
River and Creeks
Railroad Right-of-Way

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NWC Telegraph and SFS
City of Santa Fe Springs

Figure 2-5

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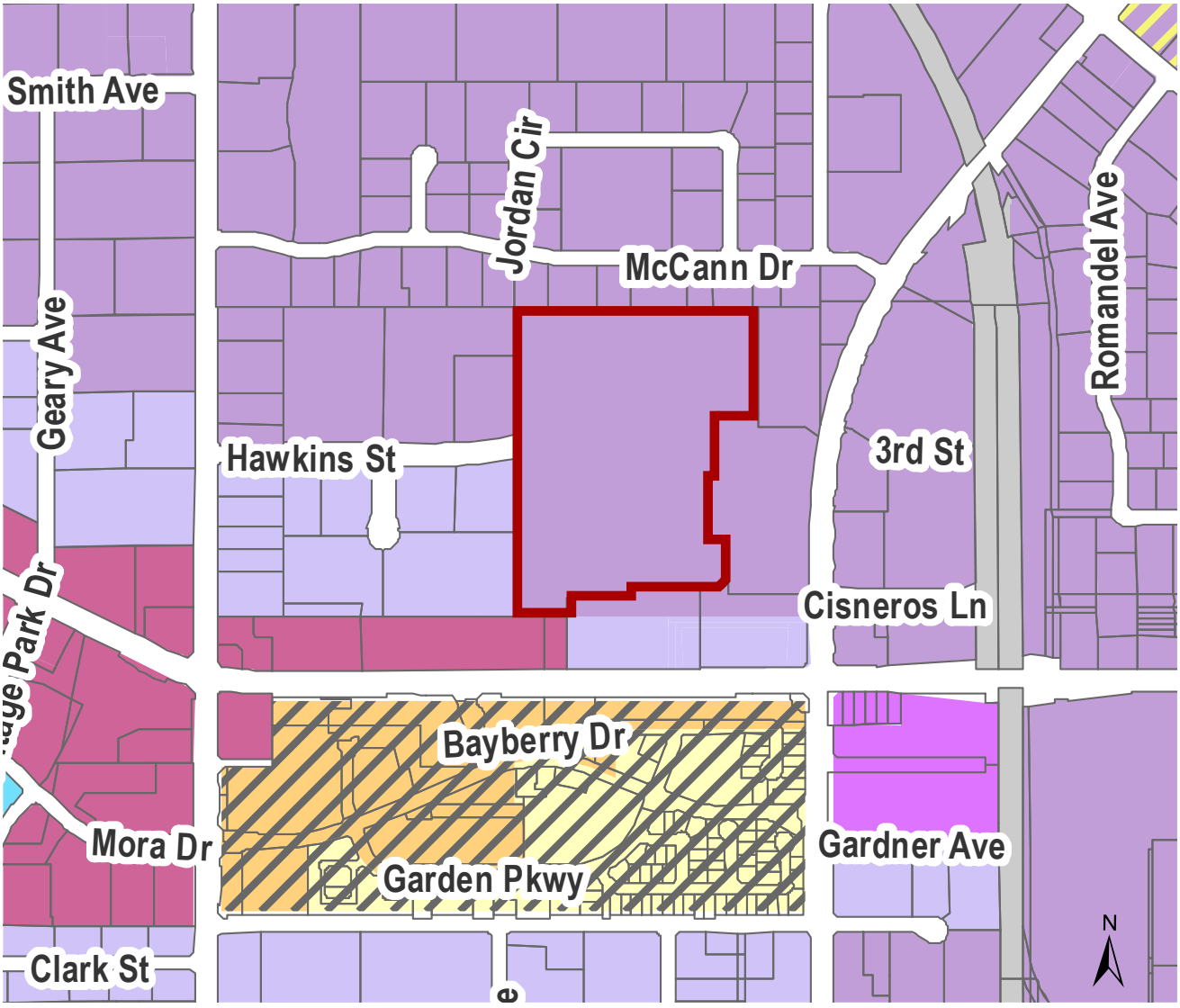
Existing Zoning



NWC Telegraph and SFS
City of Santa Fe Springs

Figure 2-6

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3. PROJECT DESCRIPTION

3.1. PROJECT OVERVIEW

The Project proposes to subdivide the approximately 26.77-acre parcel into two parcels. The applicant for the proposed Project is requesting approval from the City of Santa Fe Springs to demolish the existing building onsite, abandon the existing onsite oil wells, and to 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 conceptual site plan is provided as Figure 3-1, *Conceptual Site Plan*. Abandonment of the oil wells would be conducted pursuant to the requirements listed under Sections 117.129 and 117.130 of the Santa Fe Springs Municipal Code.

3.2. TENTATIVE PARCEL MAP

The proposed Project would include a parcel map to subdivide the 26.77-acre Project site into two parcels. Parcel 1 would be 13.45 acres and Parcel 2 would be 13.09 acres as illustrated on Figure 3-2, *Tentative Parcel Map*.

3.3. PROJECT FEATURES

Building Summary and Architecture

The proposed Project consists of two new concrete tilt-up industrial warehouse buildings with a combined total building area of 584,678 SF and a combined total footprint of 564,678 SF. Building 1 would be located in the northern portion of the site on Parcel 1 and would have a total building area of 298,373 SF, inclusive of 5,000 SF of office space and 5,000 SF of mezzanine area. Building 1 would be one story and would have a maximum height of 52 feet. Building 1 would include a 78-foot and 8-inch setback from the western property line, a 77-foot and 8-inch setback from the northern property line, and a 73-foot setback from the eastern property line.

Building 2 would be located on the southern portion of the site on Parcel 2 and would have a total building area of 286,305 SF, inclusive of 5,000 SF of office space and 5,000 SF of mezzanine area. Building 2 would be one story and would have a maximum height of 52 feet. Building 2 would include a 78-foot and three-inch setback from the western property line, a minimum 58-foot and 10-inch setback from the southern property line, and a minimum 40-foot setback from the eastern property line.

As shown in Figure 3-3 and Figure 3-4, *Building Elevations*, the proposed Project would establish an architectural presence through emphasis on building finish materials and consistent material usage and color scheme. The proposed building would feature shades of white and grey with blue glazing.

Parking and Loading Dock Summary

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

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

Access and Circulation

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

Building 1 would be accessible via two driveways: the proposed 64-foot-wide driveway on Hawkins Street and the existing 28-foot-wide driveway on Santa Fe Springs Road. The existing 28-foot-wide driveway on Santa Fe Springs Road would be restricted to left-in/right-in, right-out. This access point would be via a reciprocal access agreement with the adjacent property owner(s). The Hawkins Street driveway would allow for passenger vehicle and truck access while the Santa Fe Springs Road driveway would be restricted to passenger vehicles only.

Building 2 would be accessible via two driveways: the proposed 64-foot-wide driveway on Hawkins Street and proposed 28-foot-wide driveway on Telegraph Road. The proposed 28-foot-wide driveway on Telegraph Road would be restricted to right-in, right-out. This access point would be via a reciprocal access agreement with the adjacent property owner(s). The Hawkins Street driveway would allow for automobile and truck access, while the Telegraph Road driveway would be restricted to passenger vehicles only.

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

Landscaping and Fencing

The proposed Project includes approximately 46,601 SF (1.07 acres) of landscaping for Building 1 and 38,540 SF (0.88 acres) of landscaping for Building 2, for a total of 85,141 SF (1.96 acres) of landscaping, as shown in Figure 3-5, *Landscape Plan*. Proposed landscaping would include 24-inch and 36-inch box trees, various shrubs, and groundcover. Landscape would be installed around the perimeter of the Project site, and throughout the parking areas, to screen the proposed buildings from public viewpoints.

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

Infrastructure Improvements

Water and Sewer Improvements

The proposed Project would implement new domestic, fire, and irrigation water service lines that would connect to the existing 12-inch water main within Hawkins Street, the 16-inch water main within Telegraph Road, and the 12-inch water line within Santa Fe Springs Road. The proposed Project would install 6-inch

sewer laterals in the western portion of the site that would connect to the proposed 10-inch sewer main in Hawkins Street. The proposed 10-inch sewer main would extend approximately 250 feet west of the Project site and connect to the existing main line in Hawkins Street.

Drainage Improvements

The Project proposes to install several inlets and on-site drainage pipes to convey site runoff to two proposed underground infiltration trenches. The infiltration trenches would be 200 feet by 80 feet and 200 feet by 78 feet and would be located underground below the trailer stalls area, between Building 1 and Building 2.

Energy and Communications Utilities

The Project would install underground electric and communication lines that would connect to existing infrastructure which would also be undergrounded near the northern property line as part of the Project. The Project would not include natural gas.

3.4. CONSTRUCTION

Construction activities for the Project would occur over one phase and would include abandonment of the on-site oil wells and demolition, site preparation, grading, building construction, paving, and architectural coatings. Grading work of soils is expected to result in an export of 650 cubic yards of soil. Construction is expected to occur over 12 months beginning in August of 2025 and would occur within the hours allowable by the Santa Fe Springs Municipal Code Section 155.424.

Oil Well Abandonment

As part of Project construction, the approximate 100 active, plugged, idle, and/or cancelled on-site oil wells with six jacks and associated infrastructure would be abandoned and capped. Abandonment of the oil wells would be conducted pursuant to the requirements listed under Sections 117.129 and 117.130 of the Santa Fe Springs Municipal Code. Abandonment would occur through the California Department of Conservation, Geologic Energy Management Division (CalGEM). Should future soils testing during the well abandonment process deem it necessary, the Project would include necessary Methane Mitigation Systems as part of Project design.

3.5. OPERATIONAL CHARACTERISTICS

The Project would operate as two speculative warehouse buildings. For the purpose of providing a conservative CEQA review, the analysis assumes that the buildings would operate as 80 percent high-cube fulfillment warehouse, 10 percent high-cube cold storage, and 10 percent manufacturing. The Project is expected to begin operation in the third quarter of 2026. Typical operational characteristics would include employees traveling to and from the site, delivery of materials and supplies to the site, and truck loading and unloading. In order to provide a conservative environmental analysis, operations were assumed to be 24 hours a day, 7 days a week.

3.6. DISCRETIONARY ACTION CHECKLIST

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

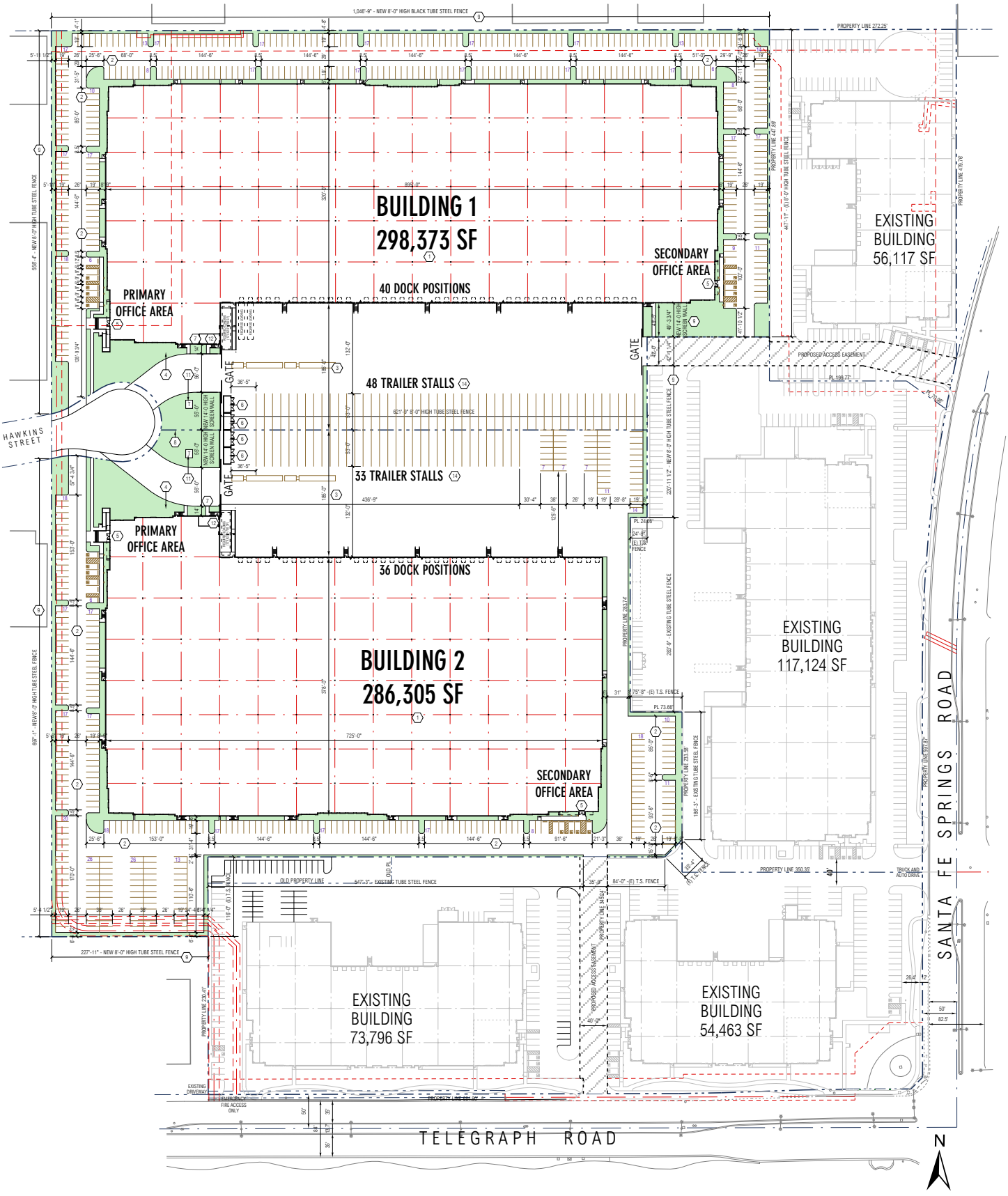
As part of the proposed Project, the following discretionary actions are being requested by the project proponent:

- Tentative Parcel Map
- Development Plan Approval

The following approvals are anticipated from responsible agencies:

- California Department of Toxic Substances Control

Conceptual Site Plan



NWC Telegraph and SFS
City of Santa Fe Springs

Figure 3-1

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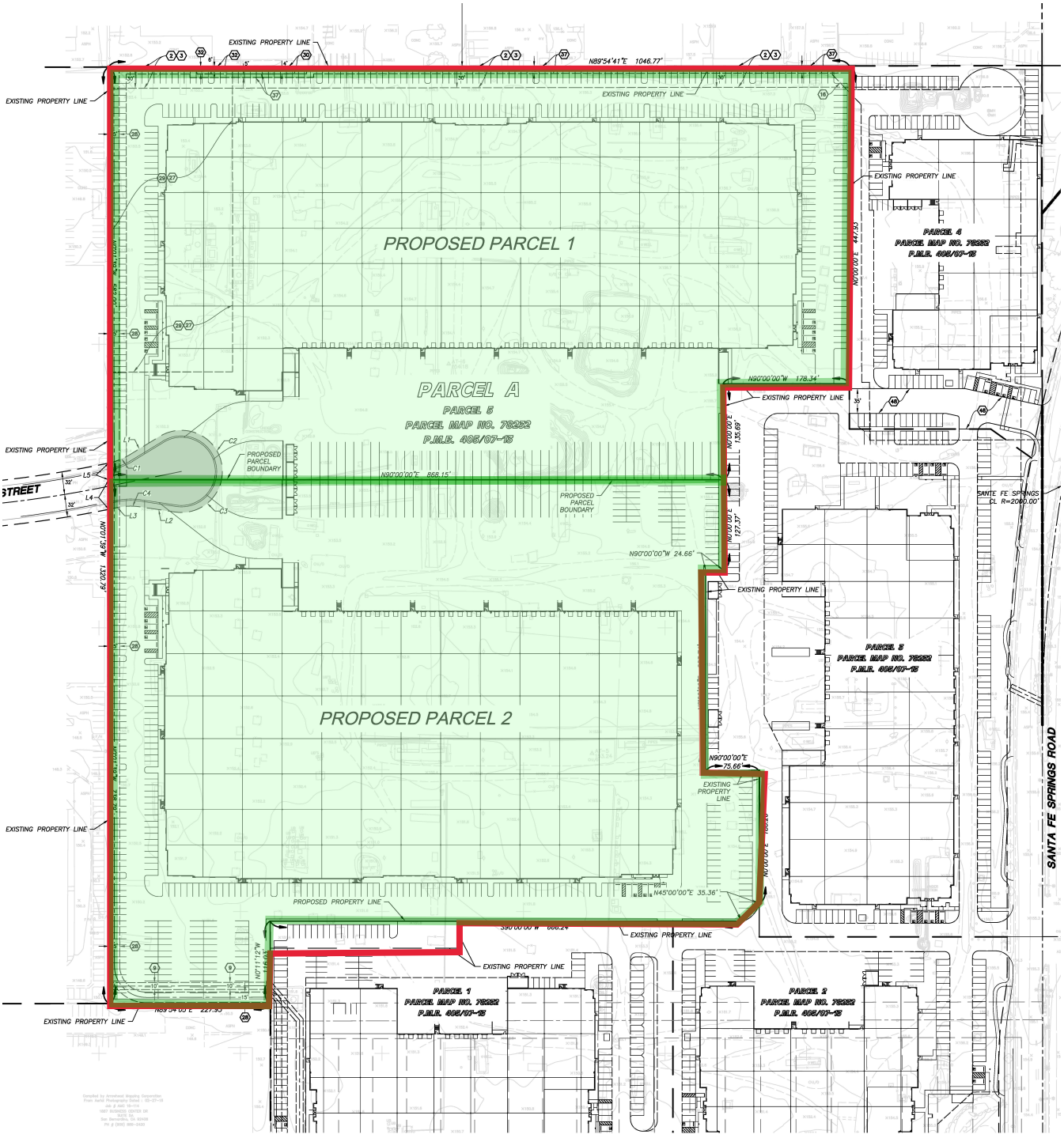
Tentative Parcel Map



Existing Property Line

Proposed Property Line

N

NWC Telegraph and SFS
City of Santa Fe Springs

Figure 3-2

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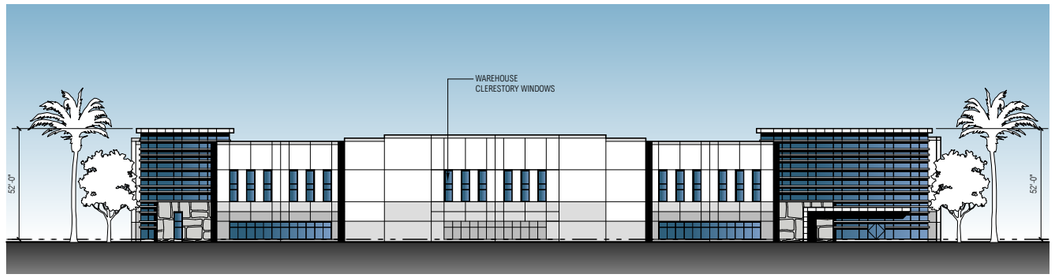
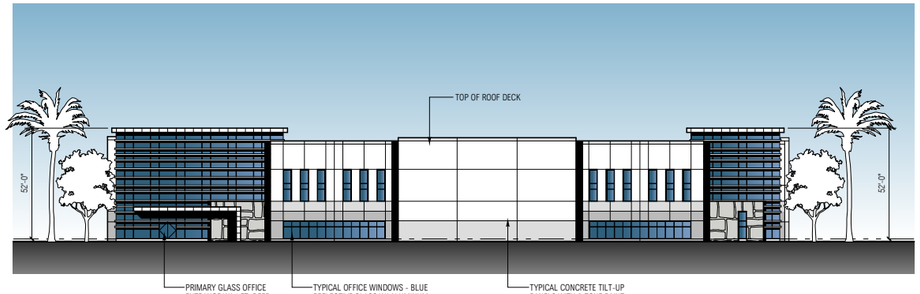
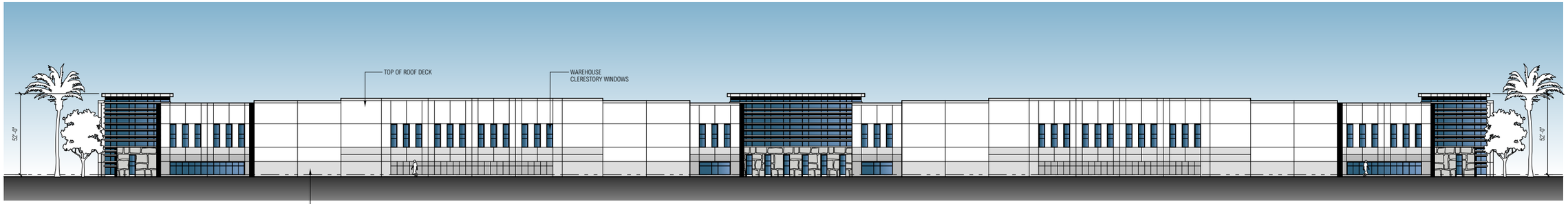
Elevations A



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



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



NORTH ELEVATION
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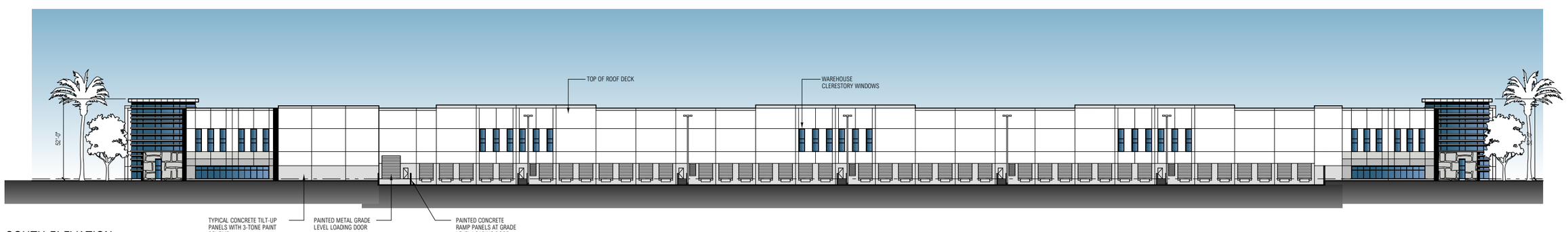

SOUTH ELEVATION
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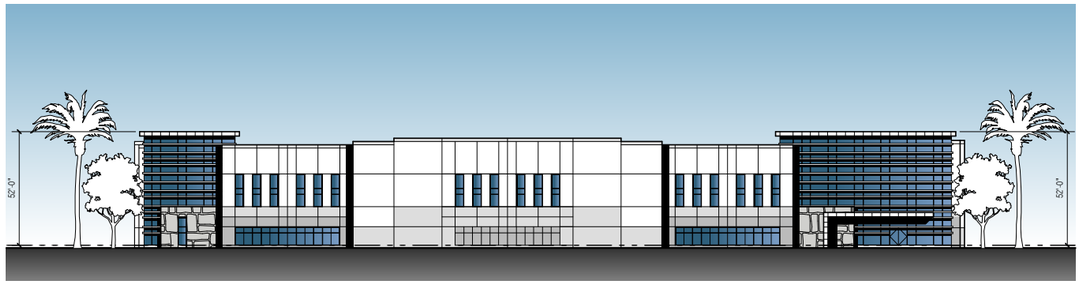
Elevations B



WEST ELEVATION
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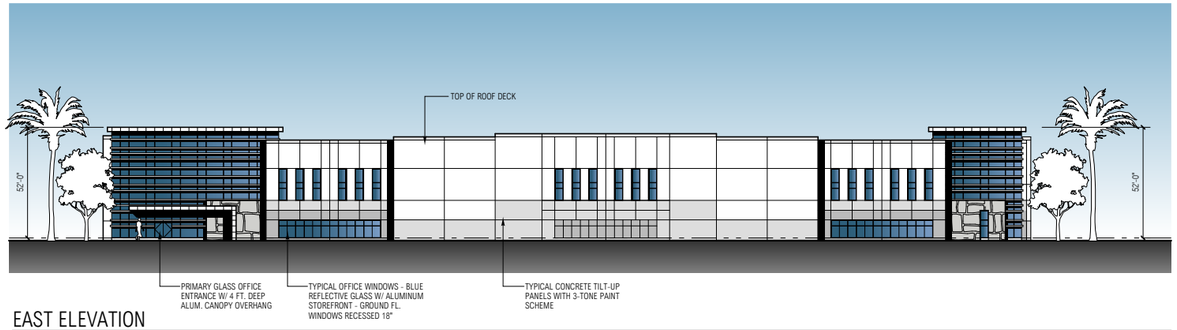

EAST ELEVATION
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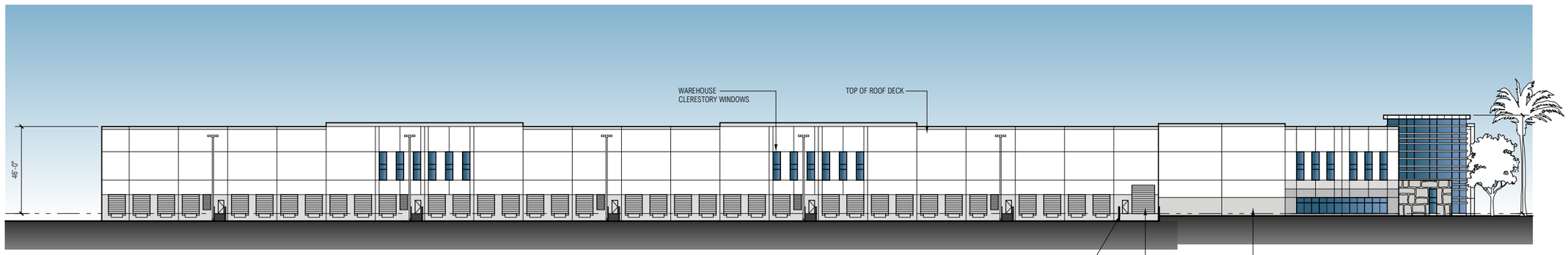

NORTH ELEVATION
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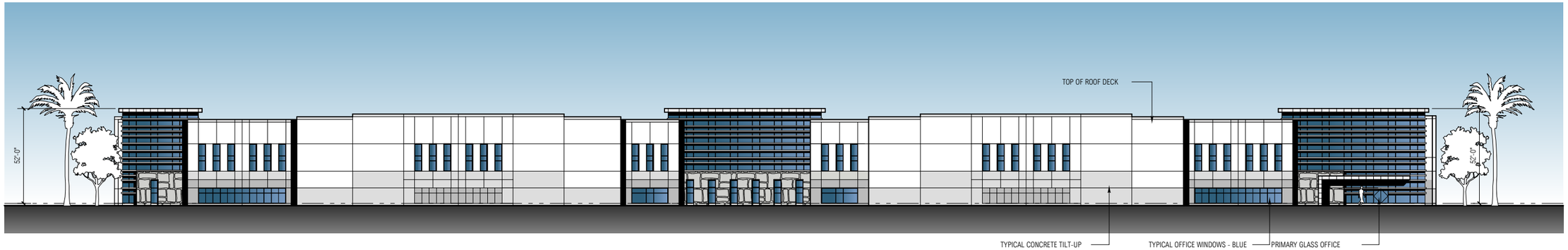

SOUTH ELEVATION
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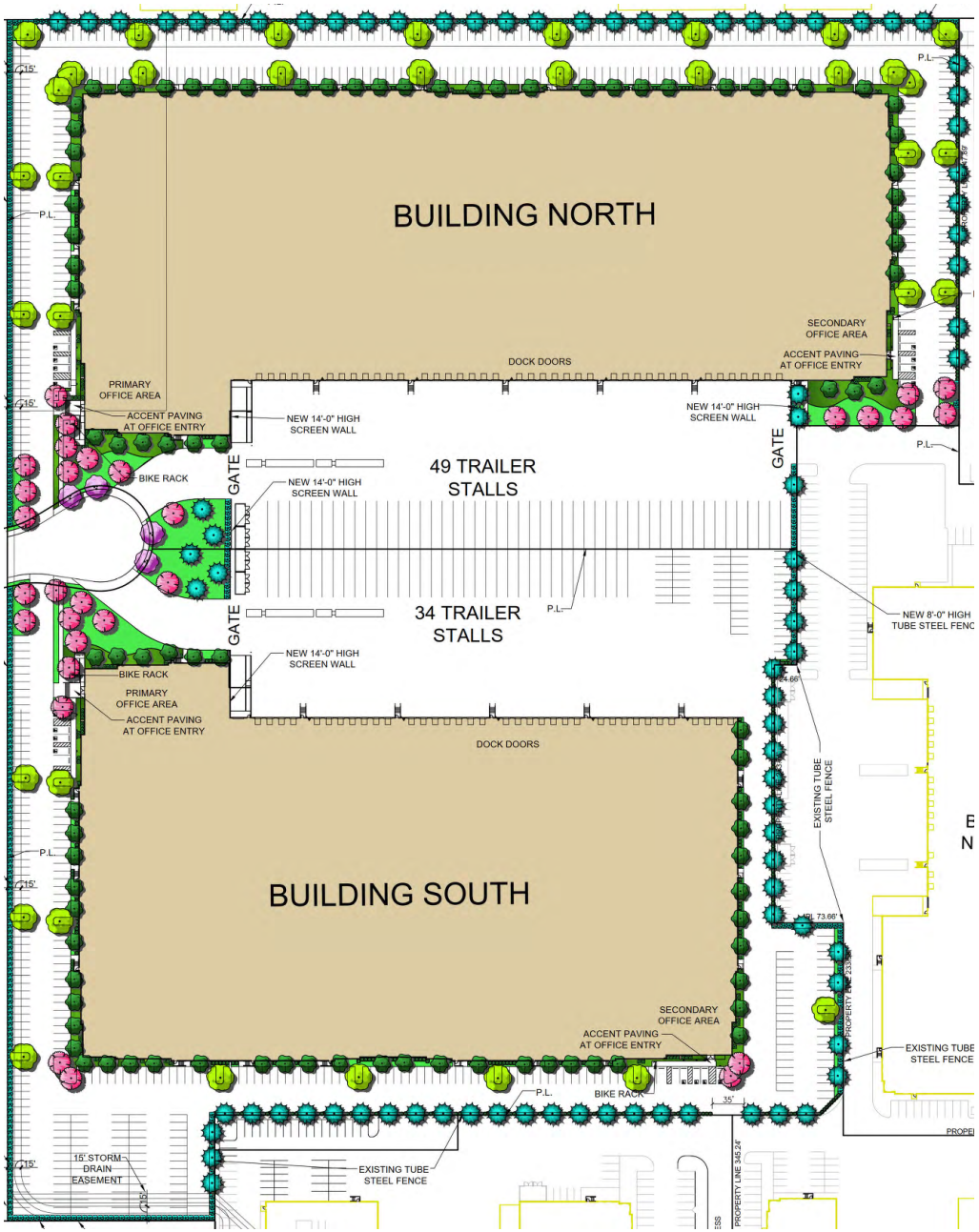
Landscape Plan



CONCEPT PLANT SCHEDULE

TREES ADJACENT TO BUILDING		92	
ARBUTUS X 'MARINA' / MARINA STRAWBERRY TREE STANDARD			24"BOX, LOW
PODOCARPUS GRACILIOR / FERN PINE			24"BOX, MED
TRISTANIA CONFERTA / BRISBANE BOX			24"BOX, MED
PARKING LOT TREES		36	
KOELREUTERIA BIPINNATA / CHINESE FLAME TREE STANDARD TRUNK			24"BOX, MED
QUERCUS VIRGINIANA / SOUTHERN LIVE OAK			24"BOX, LOW
RHUS LANCEA / AFRICAN SUMAC			24"BOX, LOW, LOW
ACCENT TREES		30	
CERCIDIUM X 'DESERT MUSEUM' / THORNLESS PALO VERDE			36"BOX, LOW
KOELREUTERIA BIPINNATA / CHINESE FLAME TREE STANDARD TRUNK			36"BOX, MED
LAGERSTROEMIA X 'MUSKOGEE' / LAVENDER CRAPE MYRTLE STD.			24"BOX, MED
QUERCUS AGRIFOLIA / COAST LIVE OAK			36"BOX
STREET TREES		4	
CUPANIOPSIS ANACARDIOIDES / CARROT WOOD - STANDARD TRUNK			24"BOX, MED, LOW
KOELREUTERIA BIPINNATA / CHINESE FLAME TREE STANDARD TRUNK			24"BOX, MED
LAGERSTROEMIA X 'MUSKOGEE' / LAVENDER CRAPE MYRTLE STD.			24"BOX, MED
PLATANUS X ACERIFOLIA / LONDON PLANE TREE			24"BOX, MED
PYRUS CALLERYANA 'BRADFORD' / BRADFORD CALLERY PEAR			24"BOX, MED
QUERCUS AGRIFOLIA / COAST LIVE OAK			24"BOX, LOW
TRISTANIA CONFERTA / BRISBANE BOX			24"BOX, MED
EVERGREEN SCREEN TREES		86	
PINUS ELDARICA / AFGHAN PINE			24"BOX, LOW
PODOCARPUS GRACILIOR / FERN PINE			24"BOX, MED
RHUS LANCEA / AFRICAN SUMAC			24"BOX, LOW, LOW
TRISTANIA CONFERTA / BRISBANE BOX			24"BOX, MED
FOUNDATION PLANTING / HEDGE SCREEN - 5 GAL - MED WATER		214	
LIGUSTRUM TEXANUM / TEXAS PRIVET			5 GAL, MED
NANDINA DOMESTICA / HEAVENLY BAMBOO			5 GAL, LOW
RHAPHIOLEPIS INDICA 'JACK EVANS' / JACK EVANS INDIAN HAWTHORN			5 GAL
LARGE SCALE FOUNDATION SHRUB - 5 GAL - LOW WATER		561	
CALLISTEMON CITRINUS / LEMON BOTTLEBRUSH SHRUB			5 GAL, LOW
DODONAEA VISCOSA 'PURPUREA' / PURPLE LEAFED HOPSEED BUSH			5 GAL
ELEAGNUS PUNGENS / SILVERBERRY			5 GAL
HETEROMELES ARBUTIFOLIA / TOYON			5 GAL, LOW
FOUNDATION / HEDGE SCREEN PLANTING - 5 GAL - LOW WATER		727	
ARBUTUS UNEDO / STRAWBERRY TREE SHRUB			5 GAL
CALLISTEMON CITRINUS / LEMON BOTTLEBRUSH SHRUB			5 GAL, LOW
DODONAEA VISCOSA 'PURPUREA' / PURPLE LEAFED HOPSEED BUSH			5 GAL
ELEAGNUS PUNGENS / SILVERBERRY			5 GAL
LEUCOPHYLLUM FRUTESCENS 'GREEN CLOUD' TM / GREEN CLOUD TEXAS RANGER			5 GAL
OLEA EUROPAEA 'MONTRA' / LITTLE OLLIE® OLIVE			5 GAL
WESTRINGIA FRUTICOSA / COAST ROSEMARY			5 GAL, LOW
SHRUB / GROUND COVER PALETTE - MEDIUM WATER USE		20,801 SF	
LIGUSTRUM TEXANUM / TEXAS PRIVET		254,109	5 GAL, MED
NANDINA DOMESTICA / HEAVENLY BAMBOO		345,871	5 GAL, LOW
PODOCARPUS GRACILIOR 'COLUMN' / FERN PINE		194,554	15 GAL, MED
BUXUS X 'GREEN GEM' / GREEN GEM BOXWOOD		3,459	5 GAL
PHILODENDRON X 'XANADU' / XANADU PHILODENDRON		2,401	5 GAL, MED
RHAPHIOLEPIS INDICA 'CLARA' / INDIAN HAWTHORN		2,401	5 GAL
ROSA FLORIBUNDA 'ICEBERG' / ICEBERG ROSE			---
ROSA X 'NOARE' / FLOWER CARPET® RED GROUNDCOVER ROSE			1 GAL
TRACHELOSPERMUM JASMINOIDES / CHINESE STAR JASMINE		5,402	1 GAL, MED
XYLOSMA CONGESTUM / SHINY XYLOSMA		1,351	5 GAL, MED
SHRUB / GROUND COVER PALETTE - LOW WATER USE		33,379 SF	
ARBUTUS UNEDO / STRAWBERRY TREE SHRUB		312,200	5 GAL, LOW
LEUCOPHYLLUM FRUTESCENS 'GREEN CLOUD' TM / GREEN CLOUD TEXAS RANGER			5 GAL
SALVIA CLEVELANDII 'ALLEN CHICKERING' / CLEVELAND SAGE		246,682	5 GAL, LOW
TECOMA X 'SUNRISE' / YELLOW BELLS		199,807	5 GAL, LOW
WESTRINGIA FRUTICOSA / COAST ROSEMARY		312,198	5 GAL, LOW
ACACIA REDOLENS 'DESERT CARPET' / DESERT CARPET BANK CATCLAW		1,389	1 GAL, LOW
AGAVE AMERICANA / CENTURY PLANT			1 GAL
AGAVE ATTENUATA 'AGAVWS' / RAY OF LIGHT FOXTAIL AGAVE			1 GAL
AGAVE PARRYI TRUNCATA / ARTICHOKE PARRY'S AGAVE		2,169	5 GAL, LOW
AGAVE X 'BLUE GLOW' / BLUE GLOW AGAVE			1 GAL
BOUGAINVILLEA X 'MONKA' / OO-LA-LA® BOUGAINVILLEA		2,169	5 GAL, LOW
BOUGAINVILLEA X 'SAN DIEGO RED' / SAN DIEGO RED BOUGAINVILLEA			1 GAL
CALLISTEMON CITRINUS 'LITTLE JOHN' / DWARF BOTTLE BRUSH			5 GAL
CAREX DIVULSA / EUROPEAN GREY SEDGE		15,421	1 GAL, LOW
DASYLIRION WHEELERI / GREY DESERT SPOON			5 GAL
HESPERALOE PARVIFLORA / RED YUCCA			5 GAL
IVA HAYESIANA / SAN DIEGO POVERTY WEED			1 GAL
LANTANA X 'NEW GOLD' / NEW GOLD LANTANA			1 GAL
LONICERA JAPONICA 'HALLIANA' / HALLS HONEYSUCKLE FLOWERING VINE			1 GAL
MUHLENBERGIA CAPILLARIS / PINK MUHLY GRASS			---
MUHLENBERGIA RIGENS / DEER GRASS		2,169	1 GAL, LOW
MYOPORUM PARVIFOLIUM 'PUTAH CREEK' / PUTAH CREEK TRAILING MYOPORUM			1 GAL
OLEA EUROPAEA 'MONTRA' / LITTLE OLLIE® OLIVE			1 GAL
PENNISETUM SPATHIOLATUM / SLENDER VELDT GRASS		3,861	1 GAL, LOW
RHAMNUS CALIFORNICA 'EVE CASE' / EVE CASE COFFEEBERRY			5 GAL
ROSMARINUS OFFICINALIS 'HUNTINGTON CARPET' / HUNTINGTON CARPET ROSEMARY		3,861	1 GAL, LOW
SALVIA GREGGII 'FURMANS RED' / FURMAN'S RED SALVIA - SPACE 3' O.C.		3,861	5 GAL
SALVIA X 'ALLEN CHICKERING' / ALLEN CHICKERING SAGE			---
SENECIO MANDRALISCAE 'BLUE CHALK STICKS' / SENECIO			1 GAL

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4. ENVIRONMENTAL CHECKLIST

4.1. BACKGROUND

Project Title: NWC Telegraph SFS
Lead Agency: City of Santa Fe Springs
Lead Agency Contact: Jimmy Wong, Planning Department JimmyWong@santafesprings.org (562) 868-0511 X7451
Project Location: The proposed NWC Telegraph and SFS Project (the 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. 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 and surrounding area is shown in Figure 2-1, *Regional Location* and Figure 2-2, *Local Vicinity*.
Project Sponsor's Name and Address: Bridgeland Resources LLC 109 N Post Oak Ln, Suite 230 Houston, TX 77024
General Plan and Zoning Designation: The Project site has a General Plan land use designation of Industrial and a zoning designation of Heavy Manufacturing (M-2).
Project Description: The Project proposes to subdivide the approximately 26.77-acre parcel into two parcels. The applicant for the proposed Project is requesting approval from the City of Santa Fe Springs to demolish the existing building onsite, abandon the existing onsite oil wells, and to 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.
Surrounding Land Uses and Setting: North: Industrial development West: Industrial development South: One industrial building, oil, and gas extraction, followed by Telegraph Road East: Oil and gas extraction, followed by Santa Fe Springs Road and industrial development
Other Public Agencies Whose Approval is Required: Department of Toxic and Substances Control

4.2. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in project, change in circumstances or new information of substantial importance, as indicated by the checklist and discussion on the following pages.

☐	Aesthetics	☐	Agriculture/Forestry Resources	☒	Air Quality
☐	Biological Resources	☐	Cultural Resources	☒	Energy
☒	Geology/Soils	☒	Greenhouse Gas Emissions	☒	Hazards/Hazardous Materials
☒	Hydrology/Water Quality	☐	Land Use/Planning	☒	Mineral Resources
☒	Noise	☐	Population/Housing	☐	Public Services
☐	Recreation	☒	Transportation	☒	Tribal Cultural Resources
☒	Utilities and Service Systems	☐	Wildfire	☒	Mandatory Findings of Significances

4.3. DETERMINATION

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARACTION will be prepared.

☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier analysis pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

4.4. EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including offsite as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross-referenced).
5. Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Guidelines Section 15063 (c)(3)(d). In this case, a brief discussion should identify the following:

Earlier Analysis Used. Identify and state where they are available for review.

Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The analysis of each issue should identify: (a) the significance criteria or threshold used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significance.

5. ENVIRONMENTAL ANALYSIS

This section provides evidence to substantiate the conclusions in the environmental checklist.

5.1. AESTHETICS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) Have a substantial adverse effect on a scenic vista?

No Impact. Scenic vistas consist of expansive, panoramic views of important, unique, or highly valued visual features that are seen from public viewing areas. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a particular view or visual setting. A scenic vista can be impacted in two ways: a development project can have visual impacts by either directly diminishing the scenic quality of the vista or by blocking the view corridors or "vista" of the scenic resource. Important factors in determining whether a proposed project would block scenic vistas include the project's proposed height, mass, and location relative to surrounding land uses and travel corridors.

The 26.77-acre Project site currently contains one, single-story office building on the western edge of the property and a canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. The Project site is within an urbanized area in the City of Santa Fe Springs where the surrounding area is primarily industrial uses. Existing public vantage points exist along roadways that surround the Project site, which do not contain expansive scenic vistas. The Project would develop two industrial warehouses with a total building area of area of 584,678 SF. The maximum building height for the proposed buildings would be 52 feet and the proposed buildings would be setback from the surrounding parcels. As described above in Section 3.0, *Project Description*, Building 1 would include a 78-foot and three-inch setback from the western property line, a 73-foot setback from the northern property line, and a 73-foot setback from the eastern property line. Building 2 would include a 78-foot and three-inch setback from the western property line, a 31-foot setback from the southern property line, and a 31-foot setback from the eastern property line. The Project would comply with setback standards as required by Section 155.244, Property Development Standards,

of the City Municipal Code. Therefore, the proposed Project would not encroach upon views of any scenic vistas for pedestrians and motorists from public vantage points on the nearest roadways including Telegraph Road and Santa Fe Springs Road. Thus, impacts would be less than significant and this topic will not be evaluated further in the forthcoming EIR.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. According to the California Department of Transportation (Caltrans) Scenic Highway Map, there are no officially designated State scenic highways near the Project site, the closest one being Route 55 which turns into State Route (SR) 91 southeast of Santa Fe Springs, approximately 15.15 miles from the Project site (California Department of Transportation, 2019). Therefore, the Project site would not damage scenic resources such as rock outcroppings, historic buildings, or trees within a state scenic highway and this topic will not be evaluated further in the EIR.

c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact. As described previously, the proposed Project is in an urbanized area and has an existing GP land use designation of Industrial and is zoned as M-2. The proposed Project is a permitted use under the Industrial land use and M-2 zone. Additionally, the proposed Project would include a new 8-foot-high tube steel fence along the southwestern, western, northern, and northeastern property line, which would connect to existing tube steel fence along the southeastern property line. The truck court would also be secured by a 14-foot-high concrete screen wall with two 10-foot-high tube steel sliding gates on the western side and one 10-foot-high tube steel sliding gate on the eastern side. The proposed fencing would be consistent with the City's development standards, as ensured during the City's plan check. The proposed Project would be consistent with the M-2 zone's development standards including FAR, setbacks, height, and fencing pursuant to Section 155.244, Property Development Standards of the Santa Fe Springs Municipal Code. Therefore, the Project would not conflict with applicable zoning regulations and impacts would be less than significant. This topic will not be further evaluated in the forthcoming EIR.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. Spill light occurs when lighting fixtures such as streetlights, parking lot lighting, exterior building lighting, and landscape lighting are not properly aimed or shielded to direct light to the desired location and light escapes and partially illuminates a surrounding location. Sensitive uses (e.g., residential uses) surrounding the Project site could be impacted by the light from development within the boundaries of the Project site if a light spill occurs.

Glare is the result of improperly aimed or blocked lighting sources that are visible against a dark background such as the night sky. Glare may also refer to the sensation experienced looking into an excessively bright light source that causes a reduction in the ability to see or causes discomfort. Glare generally does not result in illumination of off-site locations but results in a visible source of light viewable from a distance. Glare could also occur from building materials of the new structures, including glass and other reflective materials.

The 26.77-acre Project site is heavily disturbed and contains one, single-story office building on the western edge of the property and a canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. Thus, there is light and glare currently being generated from the site. However, the Project would introduce new sources

of light from new building security lighting, streetlights within the Project area, interior lights shining through building windows, and headlights from nighttime vehicular trips generated from the Project. Lighting would also be used during the construction phase for site security. Thus, the Project would increase lighting and glare compared to the existing condition. However, the Project would be subject to Sections 155.432 and 155.496 of the City Municipal Code, which prohibits light and glare to be transmitted or reflected in concentrated quantities that would be detrimental or harmful to the use of surrounding properties or streets. Thus, the proposed Project would have a less than significant impact related to light and glare, and this topic will not be evaluated further in the forthcoming EIR.

5.2. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The State of California Department of Conservation's Farmland Mapping and Monitoring Program is charged with producing maps for analyzing impacts on the state's agricultural resources. California's agricultural lands are rated based on soil quality and irrigation status. For CEQA purposes, the following categories qualify as "agricultural land": Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. Per Section 21060.1 of the State CEQA Guidelines, Farmland of Local Importance and Grazing Land are not considered Farmland.

The Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Department of Conservation. The Project site is identified as "Urban and Built-Up Land" by the California Department of Conservation's Important Farmland Finder (California Department of Conservation, 2022). Additionally, the Project site is currently zoned as M-2 which does not allow for

agricultural uses. Implementation of the proposed Project would therefore not involve the conversion of any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to urban uses. As a result, no impact would occur, and this topic will not be evaluated in the EIR.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Williamson Act (California Land Conservation Act of 1965) restricts the use of agricultural and open space lands to farming and ranching by enabling local governments to contract with private landowners for indefinite terms in exchange for reduced property tax assessments. As identified previously, the Project site is zoned M-2, which does not provide for agricultural uses, and no agriculture uses exist adjacent to the site that would be affected by the Project's implementation. In addition, according to the California Department of Conservation's Williamson Act Enrollment Finder, the Project site is not under a Williamson Act Contract (California Department of Conservation, 2022). Therefore, development of the proposed Project would not conflict with an existing Williamson Act contract or existing zoning for agricultural use. As a result, no impact would occur, and this topic will not be evaluated in the EIR.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. "Forest land" is defined as "land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits." "Timberland" is defined as "land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees." "Timberland Production Zone" (TPZ) is defined as "an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h)."

The Project site is designated M-2, and is not zoned for forest land, timberland, or Timberland Preserve Zone (TPZ). Additionally, there are no forest lands, timberland, or zoned Timberland Production in proximity to the Project site (City of Santa Fe Springs, 2021). Therefore, the proposed Project would not result in impacts to forest land, timberland, or TPZ and this topic will not be evaluated in the EIR.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project site is mostly barren with some ornamental trees and shrubs that would not qualify as forest land. In addition, the Project site is zoned M-2, and no forest land exists adjacent to the Project site. Therefore, the proposed Project would not result in the loss or conversion of forest land to non-forest use, and this topic will not be evaluated in the EIR.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

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

5.3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard?	☒	☐	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☒	☐	☐	☐

Response a) through d).

Potentially Significant Impact. The Project site is located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD), therefore the SCAQMD is responsible for the administration and implementation of the Air Quality Management Plan (AQMP). Implementation of the proposed Project would subdivide the 26.77-acre site into two parcels. Each parcel would be developed with an industrial warehouse building and associated onsite infrastructure, providing a total building area of 584,678 SF. Additional improvements to the site would include landscaping, utility connections, and pavement of parking areas and drive aisles. Development of the Project could result in the production of additional criteria air pollutants which may interfere with, or obstruct, implementation of the AQMP. Development of the proposed Project involves construction and operational activities that could generate both short-term and long-term criteria pollutants and other emissions. Additionally, localized concentrations of construction-source and operational-source emissions could adversely affect sensitive receptors. During construction, emissions from construction equipment, architectural coatings, and paving activities may be generated. During operations, trucks and vehicles operating at the loading docks may emit odor. These odors may adversely affect people surrounding the Project site, including the residential land uses located south of Telegraph Road. Further analysis will be required to determine whether the proposed Project would result in potentially significant air quality impacts. Thus, a Project-specific Air Quality Impact Analysis and Construction Health Risk Assessment will be prepared for the proposed Project as part of the Draft EIR and impacts related to Air Quality will be further analyzed in the EIR.

5.4. BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Wildlife or U.S. Fish and Wildlife Service?

Less than Significant Impact. Biological resources on the Project site were evaluated in the General Biological Assessment (GBA) completed by Hernandez Environmental Services (HES) in March 2024 (Appendix A). The GBA consisted of a literature review and review of aerial photographs and topographic maps of the Project site and surrounding areas. A query was conducted to identify sensitive species information for the Project area using the California Natural Diversity Data Base (CNDDB), the California Native Plant Society (CNPS) On-line Inventory of Rare, Threatened, and Endangered Plants, the United States Fish and Wildlife Service (USFWS) Critical Habitat and Environmental Conservation Online System (ECOS) Threatened/Endangered Species lists, the Los Angeles County Tree Ordinance, and the County of Los Angeles General Plan Significant Ecological Areas (SEA). HES also conducted a field survey of the Project site on December 15, 2023.

According to the GBA, a total of 33 sensitive plant species were found to have the potential to occur on or within the vicinity of the Project site. Of those 33 sensitive plant species, a total of 13 of the reviewed sensitive plant species are listed as state and/or federal Threatened, Endangered, or Candidate species; or have a rare plant ranking of 1B.1 on the CNPS Rare Plant Inventory (Hernandez Environmental Services, 2024). However, no sensitive plant species were not found to be present on the Project site nor to have suitable habitat present on the Project site as shown below in Table 5-1.

Table 5-1: Sensitive Plant Species with Potential to Occur on Project Site

Species Name	Rare Plant Rank	Federal/State Listing	Presence on Project Site
chaparral sandverbena (*Abronia villosa var.aurita*)	Ranked 1B.1 in Rare Plant Inventory	None	No suitable habitat and not present
Horn's milkvetch (*Astragalus hornii var. hornii*)	Ranked 1B.1 in Rare Plant Inventory	None	No suitable habitat and not present
Coulter's saltbush (*Atriplex coulteri*)	Ranked 1B.2 in Rare Plant Inventory	None	No suitable habitat and not present
Parish's brittlescale (*Atriplex parishii*)	Ranked 1B.1 in Rare Plant Inventory	None	No suitable habitat and not present
Davidson's saltscale (*Atriplex serenana var. davidsonii*)	Ranked 1B.2 in Rare Plant Inventory	None	No suitable habitat and not present
Plummer's mariposa-lily (*Calochortus plummerae*)	Ranked 4.2 in Rare Plant Inventory	None	No suitable habitat and not present
Intermediate mariposa-lily (*Calochortus weedii var. intermedius*)	Ranked 1B.2 in Rare Plant Inventory	None	No suitable habitat and not present
lucky morning-glory (Calystegia felix)	Ranked 1B.1 in Rare Plant Inventory	None	No suitable habitat and not present
southern tarplant (Centromadia parryi ssp. australis)	Ranked 1B.1 in Rare Plant Inventory	None	No suitable habitat and not present
salt marsh bird's-beak (*Chloropyron maritimum ssp. maritimum*)	Ranked 1B.2 in Rare Plant Inventory	Endangered/ Endangered	No suitable habitat and not present
Peruvian dodder (*Cuscuta obtusiflora var. glandulosa*)	Ranked 2B.2 in Rare Plant Inventory	None	No suitable habitat and not present
slender-horned spineflower (*Dodecahema leptoceras*)	Ranked 1B.1 in Rare Plant Inventory	Endangered/ Endangered	No suitable habitat and not present
many-stemmed dudleya (*Dudleya multicaulis*)	Ranked 1B.2 in Rare Plant Inventory	None	No suitable habitat and not present

Los Angeles sunflower (*Helianthus nuttallii ssp. parishii*)	Ranked 1A in Rare Plant Inventory	None	No suitable habitat and not present
mesa horkelia (*Horkelia cuneata var. puberula*)	Ranked 1B.1 in Rare Plant Inventory	None	No suitable habitat and not present
decumbent goldenbush (*Isocoma menziesii var. decumbens*)	Ranked 1B.2 in Rare Plant Inventory	None	No suitable habitat and not present
Coulter's goldfields (*Lasthenia glabrata ssp. coulteri*)	Ranked 1B.1 in Rare Plant Inventory	None	No suitable habitat and not present
Robinson's pepper-grass (*Lepidium virginicum var. robinsonii*)	Ranked 4.3 in Rare Plant Inventory	None	No suitable habitat and not present
mud nama (*Nama stenocarpa*)	Ranked 2B.2 in Rare Plant Inventory	None	No suitable habitat and not present
Gambel's water cress (*Nasturtium gambelii*)	Ranked 1B.1 in Rare Plant Inventory	Endangered/ Threatened	No suitable habitat and not present
prostrate vernal pool navarretia (*Navarretia prostrata*)	Ranked 1B.2 in Rare Plant Inventory	None	No suitable habitat and not present
coast woollyheads (*Nemacaulis denudata var. denudata*)	Ranked 1B.2 in Rare Plant Inventory	None	No suitable habitat and not present
California Orcutt grass (*Orcuttia californica*)	Ranked 1B.1 in Rare Plant Inventory	Endangered/ Endangered	No suitable habitat and not present
Lyon's pentachaeta (*Pentachaeta lyonii*)	Ranked 1B.1 in Rare Plant Inventory	Endangered/ Endangered	No suitable habitat and not present
Brand's star phacelia (*Phacelia stellaris*)	Ranked 1B.1 in Rare Plant Inventory	None	No suitable habitat and not present
white rabbit-tobacco (*Pseudognaphalium leucocephalum*)	Ranked 2B.2 in Rare Plant Inventory	None	No suitable habitat and not present
Parish's gooseberry (Ribes divaricatum var. parishii)	Ranked 1A in Rare Plant Inventory	None	No suitable habitat and not present
Sanford's arrowhead (Sagittaria sanfordii)	Ranked 1B.2 in Rare Plant Inventory	None	No suitable habitat and not present
southern mountains skullcap (Scutellaria bolanderi ssp. austromontana)	Ranked 1B.2 in Rare Plant Inventory	None	No suitable habitat and not present
salt spring checkerbloom (Sidalcea neomexicana)	Ranked 2B.2 in Rare Plant Inventory	None	No suitable habitat and not present
estuary seablite (Suaeda esteroa)	Ranked 1B.2 in Rare Plant Inventory	None	No suitable habitat and not present
San Bernardino aster (Symphyotrichum defoliatum)	Ranked 1B.2 in Rare Plant Inventory	None	No suitable habitat and not present
Greata's aster (Symphyotrichum greatae)	Ranked 1B.3 in Rare Plant Inventory	None	No suitable habitat and not present

Source: General Biological Resources Assessment, April 2024 (Appendix A)
Note: Shaded rows reflect sensitive plant species listed as state and/or federal Threatened, Endangered, or Candidate species; or have a rare plant ranking of 1B.1 on the CNPS Rare Plant Inventory.

The field survey did not identify suitable habitat for any of the above-mentioned plant species. Therefore, implementation of the Project would have a less than significant impact on sensitive plant species.

Of the 48 special-status wildlife species, 17 are listed as state and/or federal Threatened, Endangered, or Candidate. These species, their listing status, and their presence on site are listed in Table 5-2 below. The field survey did not identify suitable habitat for any of the animal species mentioned below, including any suitable habitat for burrowing owl (Hernandez Environmental Services, 2024). Therefore, implementation of the Project would have a less than significant impact on sensitive wildlife species and this topic will not be further evaluated in the EIR.

Table 5-2: Sensitive Animal Species with Potential to Occur on Project Site

Species Name	Listing Status	Presence on Project Site
Tricolored blackbird (*Agelaius tricolor*)	State-Threatened; BLM Sensitive, CDFW Species of Special Concern, IUCN Endangered, USFWS Birds of Conservation Concern	No suitable habitat and not present
Crotch bumble bee (*Bombus crotchii*)	State-Candidate Endangered; IUCN Endangered	No suitable habitat and not present
Swainson's hawk (*Buteo swainsoni*)	State-Threatened; BLM Sensitive, IUCN Least Concern	No suitable habitat and not present
green turtle (*Chelonia mydas*)	Federal-Threatened; IUCN Endangered	No suitable habitat and not present
western yellow-billed cuckoo (*Coccyzus americanus occidentalis*)	Federal-Threatened and State-Endangered; BLM Sensitive, USFS Sensitive	No suitable habitat and not present
monarch -California overwintering population (*Danaus plexippus plexippus pop. 1*)	Federal-Candidate; IUCN Endangered, USFS Sensitive	No suitable habitat and not present
Southwestern willow flycatcher (*Empidonax traillii extimus*)	Federal- Endangered and State-Endangered	No suitable habitat and not present
western pond turtle (*Emys marmorata*	Federal- Proposed Threatened; BLM Sensitive, CDFW Species of Special Concern, IUCN Vulnerable, USFS Sensitive	No suitable habitat and not present
quino checkerspot butterfly (*Euphydryas editha quino*)	Federal- Endangered	No suitable habitat and not present
California black rail (*Laterallus jamaicensis coturniculus*)	State-Threatened; BLM Sensitive, CDFW Fully Protected, IUCN Endangered	No suitable habitat and not present
steelhead -southern California DPS (*Oncorhynchusmykiss irideuspop. 10*)	Federal- Endangered and State-Candidate Endangered; AFS Endangered	No suitable habitat and not present
Belding's savannah sparrow (*Passerculus sandwichensis beldingi*)	State-Endangered; USFWS Birds of Conservation Concern	No suitable habitat and not present
Pacific pocket mouse (*Perognathus longimembris pacificus*)	Federal-Endangered; CDFW Species of Special Concern	No suitable habitat and not present
coastal California gnatcatcher (*Polioptila californica californica*)	Federal-Threatened; CDFW Species of Special Concern	No suitable habitat and not present

Western spadefoot (*Spea hammondii*)	Federal-Proposed Threatened; BLM Sensitive, CDFW Species of Special Concern, IUCN Near Threatened	No suitable habitat and not present
California least tern (*Sternula antillarum browni*)	Federal and State-Endangered; CDFW Fully Protected	No suitable habitat and not present
least Bell's vireo (*Vireo bellii pusillus*)	Federal and State-Endangered	No suitable habitat and not present

Source: General Biological Resources Assessment, April 2024 (Appendix A)

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. Riparian habitats occur along the banks of rivers, streams, or wetland areas. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies or are known to provide habitat for sensitive animal or plant species. As described in the General Biological Assessment (Appendix A), the Project site does not contain or support any streams, drainages or riparian habitats (Hernandez Environmental Services, 2024). Thus, no impacts related to riparian habitat or other sensitive natural communities identified in local or regional plans would result from Project implementation. This topic will not be further evaluated in the EIR.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs. As described in the General Biological Assessment, the Project site does not contain natural wetlands (Hernandez Environmental Services, 2024). Therefore, the Project would not result in impacts to wetlands and this topic will not be further evaluated in the EIR.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact with Mitigation Incorporated.

Wildlife corridors are areas where wildlife movement is concentrated due to natural or anthropogenic constraints and corridors provide access to resources such as food, water, and shelter. Animals use these corridors to move between different habitats and provide avenues for wildlife dispersal, migration, and contact between other populations. As mentioned previously, the Project site is heavily disturbed and contains one, single-story office building on the western edge of the property and a canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. The Project site is also located in an urban area and is surrounded by developed land uses. Further, no wildlife movement corridors were found to be present on the Project site nor does the Project site support conditions for migratory wildlife corridors or linkages (Hernandez Environmental Services, 2024). There are no rivers, creeks, or open drainages near the site that could function as a wildlife corridor. Thus, implementation of the Project would not result in impacts related to wildlife movement or wildlife corridors.

However, the Project site contains shrubs and some trees that could be used for nesting by common bird species that are protected by the federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code Sections 3503.5, 3511, and 3515 during the avian nesting and breeding season that occurs between February 1 and September 15. The provisions of the MBTA prohibit disturbing or destroying active nests. Therefore, Mitigation Measure BIO-1 has been included to require that if commencement of vegetation clearing occurs between February 1 and September 15, a qualified biologist shall conduct a nesting bird survey no more than 3 days prior to commencement of activities to confirm the absence of nesting birds. With implementation of Mitigation Measure BIO-1, potential impacts to nesting birds would be less than significant. As such, this topic will not be further evaluated in the EIR.

e) Conflict with any local policies or ordinances protecting biological resources?

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

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project site is located in an urban area and is not within the boundary of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP) or other approved local, regional, or state habitat conservation plan. As such, the proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan and no impacts would occur. This topic will not be further evaluated in the EIR.

Mitigation Measures

Mitigation Measure 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.

5.5. CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact.

According to the State CEQA Guidelines, a historical resource is defined as something that meets one or more of the following criteria: (1) listed in, or determined eligible for listing in, the California Register of Historical Resources; (2) listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k); (3) identified as significant in a historical resources survey meeting the requirements of PRC Section 5024.1(g); or (4) determined to be a historical resource by the Project's Lead Agency.

The Project site is heavily disturbed and contains one, single-story office building on the western edge of the property and a canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. The Phase I Cultural Resources Assessment (Appendix B) prepared by BFSA determined that none of the features identified on the Project site appear to be older than 50 years and the six oil pump jacks do not correspond with the historic extraction of oil on the property (BFSA , 2024). As such, there are no existing historical resources within the Project site or within the immediate vicinity of the Project, and impacts related to historic resources would not occur from implementation of the Project. Thus, this topic will not be further evaluated in the EIR.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant Impact with Mitigation Incorporated.

As mentioned previously, the Project site is currently heavily disturbed. Project construction would require excavation at depths of approximately seven feet. As part of the Phase I Cultural Resources Assessment, an archaeological records search for the Project site and surrounding area was conducted through the South Central Coastal Informational Center at California State University Fullerton. The records search indicated that 35 previous studies have been conducted within a mile of the Project site and 12 resources have been identified within a mile of the Project site, however, no resources have been recorded within the boundaries of the Project site or immediate vicinity (BFSA , 2024). Additionally, a field survey was conducted on January 15, 2024, in which no cultural resources were identified within the Project site (BFSA , 2024). Based upon the results of the cultural resources study and field survey as well as the current disturbed state of the Project site, the potential to encounter unknown archeological resources was determined to be minimal. However, in the event that any historic or prehistoric cultural resources are inadvertently discovered, all construction work in the immediate vicinity of the discovery shall stop and a qualified archaeologist shall be engaged to evaluate the discovery as described in MM CUL-1. With the implementation of MM CUL-1, impacts related

to archaeological resources would be less than significant. Thus, this topic will not be further evaluated in the EIR.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact.

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

Existing Plans, Programs, or Policies

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

Mitigation Measures

MM CUL-1: Inadvertent Discovery. In the event that potential archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the City or County List of Qualified Archaeologists has evaluated the find to determine whether the find constitutes a "unique archaeological resource," as defined in Section 21083.2(g) of the California Public Resources Code. Any resources identified shall be treated in accordance with California Public Resources Code Section 21083.2(g).

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

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

5.6. ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☒	☐	☐	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☒	☐	☐	☐

Response a) and b).

Potentially Significant Impact. The 26.77-acre Project site is heavily disturbed and contains one, single-story office building on the western edge of the property and a canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. Implementation of the proposed Project would include the development of two industrial warehouse buildings with a total building area of 584,678 SF. Additional improvements to the site would include landscaping, utility connections, and pavement of parking areas and drive aisles. Project construction would require consumption of energy resources through operation of construction vehicles and equipment, as well as worker vehicles. Additionally, Project operation of the proposed industrial facilities would require consumption of energy resources to power the facilities, as well as fuel trucks and worker vehicles. Thus, the proposed Project could result in wasteful, inefficient, or unnecessary consumption of energy resources and/or conflict with a state or local renewable energy plan. Therefore, the Project could result in potentially significant impacts to energy resources and this topic will be further analyzed in the EIR. The EIR will quantify the amount of energy that would be used by both construction and operation of the proposed Project to identify if wasteful, inefficient, or unnecessary consumption of energy resources would occur from implementation of the Project and evaluate its consistency with the applicable plans and policies.

5.7. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42)	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

No Impact. In 1972, the Alquist-Priolo Special Studies Zones Act was signed into law. In 1994, it was renamed the Alquist-Priolo Earthquake Fault Zoning Act (A-P Act). The primary purpose of the Act is to mitigate the hazard of fault rupture by prohibiting the location of structures for human occupancy across the trace of an active fault. The A-P Act requires the State Geologist (Chief of the California Geology Survey) to delineate "Earthquake Fault Zones" along with faults that are "sufficiently active" and "well-defined." The boundary of an "Earthquake Fault Zone" is generally about 500 feet from major active faults and 200 to 300 feet from well-defined minor faults. The A-P Act dictates that cities and counties withhold development

permits for sites within an Alquist-Priolo Earthquake Fault Zone until geologic investigations demonstrate that the site zones are not threatened by surface displacements from future faulting.

The Project site is not located within an Alquist-Priolo Earthquake Fault zone (California Geological Survey, 2024) . The closest Alquist-Priolo Earthquake Fault zones are the Elsinore fault zone, located approximately 5.5 miles northeast and the East Montebello Fault Zone, located approximately 7 miles north from the Project site, respectively. Due to the distance of the Project site from the closest fault zone, there is no potential for the Project to be subject to rupture of a known earthquake fault. Impacts related to a fault zone would not occur from implementation of the proposed Project. Thus, this topic will not be further analyzed in the EIR.

ii. Strong seismic ground shaking?

Less Than Significant Impact.

The Project site, like most of southern California, could be subject to seismically-related strong ground shaking. Ground shaking is a major cause of structural damage from earthquakes. The amount of motion expected at a building site can vary from none to forceful depending upon the distance to the fault, the magnitude of the earthquake, and the local geology.

The closest active fault zones to the Project site are the Elsinore fault zone, located approximately 5.5 miles northeast and the East Montebello Fault Zone, located approximately 7 miles north from the Project site, respectively. A major earthquake along these faults or another regional fault could cause substantial seismic ground shaking at the site. However, structures built in the City are required to be built in compliance with the California Building Code (CBC) (California Code of Regulations, Title 24, Part 2) that provides provisions for earthquake safety based on factors including building occupancy type, the types of soils onsite, and the probable strength of ground motion. Compliance with the CBC would require the incorporation of: 1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; 2) proper building footings and foundations; and 3) construction of the building structure so that it would withstand the effects of strong ground shaking.

Pursuant to Title 15, Chapter 150, Building Regulations, of the Santa Fe Springs Municipal Code, the Project would incorporate the design recommendations included in its geotechnical report, which will be subject to review and approval by City staff prior to issuance of a grading permit. Compliance with the CBC as verified by the City's review process and included as a condition of approval, would reduce impacts related to strong seismic ground shaking to a less than significant level. Therefore, this topic will not be further analyzed in the EIR.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact.

Soil liquefaction is a phenomenon in which saturated, cohesionless soils layers, located within approximately 50 feet of the ground surface, lose strength due to cyclic pore water pressure generation from seismic shaking or other large cyclic loading. During the loss of stress, the soil acquires “mobility” sufficient to permit both horizontal and vertical movements. Soil properties and soil conditions such as type, age, texture, color, and consistency, along with historical depths to ground water are used to identify, characterize, and correlate liquefaction susceptible soils.

Soils that are most susceptible to liquefaction are clean, loose, saturated, and uniformly graded fine-grained sands that lie below the groundwater table within approximately 50 feet below ground surface. Lateral spreading is a form of seismic ground failure due to liquefaction in a subsurface layer.

According to Figure S-1, Seismic Hazards, of the Santa Fe Springs General Plan Safety Element, the Project site is not identified as being within a liquefaction zone (City of Santa Fe Springs, 2021). Additionally,

compliance with the CBC, ensured through the City's plan check, would reduce impacts related to seismic-related ground failure to a less than significant level. Therefore, a less than significant impact related to seismic-related ground failure would occur and this topic will not be addressed in the EIR.

iv. Landslides?

No Impact. Landslides and other slope failures are secondary seismic effects that are common during or soon after earthquakes. Areas that are most susceptible to earthquake-induced landslides are steep slopes underlain by loose, weak soils, and areas on or adjacent to existing landslide deposits. As described above, the Project site is located in a seismically active region subject to strong ground shaking. However, the Project site is located in a flat area that does not contain nor is adjacent to large slopes, and the Project would not generate large slopes. As a result, implementation of the Project would not expose people or structures to substantial adverse effects involving landslides, and impacts related to landslides would not occur. This topic will not be further analyzed in the EIR.

b) Result in soil erosion or the loss of topsoil?

Less than Significant Impact. Construction of the proposed Project has the potential to contribute to soil erosion and the loss of topsoil. Grading activities that would be required for the Project would expose and loosen topsoil, which could be eroded by wind or water. To reduce the potential for soil erosion and the loss of topsoil, construction activities would require a Storm Water Pollution Permit (SWPPP), which is mandated by the National Pollution Discharge Elimination System (NPDES) General Construction Permit (included as PPP HYD-1 herein) and enforced by the Los Angeles RWQCB. The SWPPP is required to address site-specific conditions related to specific grading and construction activities that could cause erosion and the loss of topsoil and provide erosion control BMPs to reduce or eliminate the erosion and loss of topsoil. Erosion control BMPs include use of silt fencing, fiber rolls, or gravel bags, stabilized construction entrance/exit, hydroseeding, etc. Compliance with State and federal requirements would ensure that the proposed Project would have a less than significant impact related to soil erosion or loss of topsoil.

Additionally, the proposed Project includes installation of landscaping adjacent to the proposed buildings and throughout the proposed parking areas. With this landscaping, areas of loose topsoil that could erode by wind or water would not exist upon operation of the proposed Project. Thus, with implementation of existing requirements, impacts related to substantial soil erosion or loss of topsoil would be less than significant and this topic will not be further analyzed in the EIR.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

Less than Significant Impact. As stated above, the Project site is not located in an area that is susceptible to landslides or liquefaction. Lateral spreading is the finite, lateral movement of gently to steeply sloping, saturated soil deposits caused by earthquake-induced liquefaction. Due to the depth of groundwater and the low susceptibility to liquefaction, the potential for lateral spreading is considered low (LGC Geotechnical, 2024).

Subsidence is a general lowering of the ground surface over a large area that is generally attributed to lowering of the ground water levels within a groundwater basin. Localized or focal subsidence or settlement of the ground can occur as a result of an earthquake motion in an area where groundwater in basin is lowered. An onsite Geotechnical Investigation consisting of subsurface evaluation in the form of eight hollow-stem borings was conducted by LGC Geotechnical in February 2024 (Appendix C). The depths of the borings ranged between 10 to 50 feet below existing grade and groundwater was not encountered to the maximum explored depth of approximately 51.5 feet below existing grade (LGC Geotechnical, 2024). In addition,

the Project would not pump water from the Project area, however, slight subsidence is anticipated as a result of soil excavation and compaction. Thus, impacts related to subsidence would be less than significant.

As described previously, compliance with the requirements of the CBC and related recommendations in the Geotechnical Investigation related to compaction of soils and development of foundations is required as part of the building plan check and development permitting process, and would reduce potential impacts related to lateral spreading, liquefaction, subsidence, and ground collapse to a less than significant level. Therefore, this topic will not be further evaluated in the EIR.

d) Be located on expansive soil, as defined in in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Expansive soils contain certain types of clay minerals that shrink or swell as the moisture content changes; the shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semiarid areas with seasonal changes of soil moisture experience, such as southern California, have a higher potential of expansive soils than areas with higher rainfall and more constant soil moisture.

The Geotechnical Investigation, included as Appendix C, found that the onsite soils of the Project site consist of medium dense to very dense sands and silty sands and stiff to very stiff sandy silts and clays. Based on preliminary field investigation and laboratory testing, on-site soils possess a "very low" expansion potential (LGC Geotechnical, 2024). In addition, as described previously, compliance with the CBC would require specific engineering design recommendations be incorporated into grading plans and building specifications as a condition of construction permit approval to ensure that Project structures would withstand effects related to ground movement, including expansive soils. Therefore, impacts would be less than significant, and this topic will not be addressed in the EIR.

***e)* Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

No Impact. The proposed Project would be served by the City sewer utilities and would not include the use of septic tanks or alternative wastewater disposal systems. Implementation of the Project would not result in impacts related to these systems, thus this topic will not be analyzed in the EIR.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact. The Project site has the potential to contain paleontological resources. Construction of the proposed Project would include earthmoving activities, such as grading, which have the potential to disturb previously unknown paleontological resources. A paleontological assessment for the Project site will be conducted to analyze the sensitivity of the Project site to contain paleontological resources and potential impacts of the proposed Project on such resources. Therefore, this topic will be addressed in the forthcoming EIR, and mitigation measures will be recommended, as appropriate.

Existing Plans, Programs, or Policies (PPPs)

PPP WQ-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Building and Safety Department evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resources Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

5.8. GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

Potentially Significant Impact

Response a) through b).

Potentially Significant Impact. Global climate change is not confined to a particular project area. A typical project does not generate enough greenhouse gas (GHG) emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact. GHGs are produced by both direct and indirect emissions sources. Direct emissions include consumption of natural gas, heating and cooling of buildings, landscaping activities and other equipment used directly by land uses. Indirect emissions include the consumption of fossil fuels for vehicle trips, electricity generation, water usage, and solid waste disposal.

Implementation of the proposed Project would include the development of two industrial warehouse buildings with a total building area of 584,678 SF. Additional improvements to the site would include landscaping, utility connections, and pavement of parking areas and drive aisles. Implementation of the proposed Project would generate GHG emissions during both construction and operation of the Project. During construction, sources of GHG emissions would include operation of construction equipment and worker commutes to and from the Project site. During Project operation, the proposed Project would generate GHG emissions from vehicular trips; water, natural gas, and electricity consumption; and solid waste generation. The Project has the potential to generate an increase in GHG emissions. As such, a Project-specific GHG study will be conducted to determine the significance of the Project's GHG emissions and identify mitigation measures as appropriate to reduce potential impacts. Therefore, the Project could result in potentially significant GHG impacts, and this topic will be discussed further in the EIR.

5.9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☒	☐	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☒	☐	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☒	☐	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☒	☐	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☒	☐	☐	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☒	☐	☐	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☒	☐	☐	☐

Responses a) through h).

Potentially Significant Impact. The 26.77-acre Project site is heavily disturbed and contains one, single-story office building on the western edge of the property and a canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. Since the Project site has a history of oil and gas extraction, the site could contain unknown hazardous materials, substances, or waste that could result in a significant hazard to the public or the environment if disturbed during Project construction or operation. In addition, the proposed Project would develop the site with two new warehouse buildings with a total building area of 584,678 SF and related parking, landscaping, and access improvements. Construction and long-term operation of the Project would require transport, use, and disposal of hazardous materials and wastes. As such, a Project-specific Phase I Environmental Site Assessment would be conducted to determine the potential for impacts related to hazards and hazardous materials and identify mitigation measures as appropriate to reduce potential impacts. Construction and operation of the Project could result in potentially significant impacts to workers and land uses surrounding the Project site. Therefore, impacts related to hazards and hazardous materials will be further analyzed in the EIR.

5.10. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☒	☐	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☒	☐	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site?	☒	☐	☐	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	☒	☐	☐	☐
e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☒	☐	☐	☐
f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?	☒	☐	☐	☐
g) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
h) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☒	☐	☐	☐

Responses a) through f).

Potentially Significant Impact. The Project site is heavily disturbed and contains one, single-story office building on the western edge of the property and a canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. The Project proposes to subdivide the 26.77-acre parcel into two parcels and would demolish the existing building as well as abandon the existing oil wells onsite in order to construct two new warehouse

buildings. The proposed industrial warehouse buildings would consist of a combined total building area of 584,678 SF.

Construction of the Project would require grading and excavation of soils, which would loosen sediment, and then have the potential to mix with surface water runoff and degrade water quality. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and transport of sediment downstream compared to existing conditions.

Additionally, the proposed Project would consist of the operation of two industrial warehouses, which could introduce the potential for pollutants such as chemicals from cleaners, pesticides and sediment from landscaping, trash and debris, and oil and grease from vehicles and trucks. These pollutants could potentially discharge into surface waters and result in degradation of water quality. Development of the Project site would also introduce new impervious surfaces, which could result in impacts to the site's existing drainage pattern and the rate and volume of stormwater runoff. Such changes could exceed the capacity of existing and planned stormwater drainage systems. Construction and operation of the Project could result in potentially significant impacts to hydrology and water quality. Therefore, impacts related to hydrology and water quality will be further addressed in the EIR.

g) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. According to FEMA FIRM Map 06037C1829F, the Project site is completely located in "Zone X," which is an area of minimal flood hazard (FEMA, 2021). Thus, the proposed Project would not be located within a flood hazard zone and would result in a less than significant impact on flood hazard.

Tsunamis are large waves that occur in coastal areas; therefore, since the City is not located in a coastal area, no impacts due to tsunamis would occur. Additionally, the Project site does not contain and is not adjacent to any water bodies that could seiche. The nearest body of water is the San Gabriel River, approximately 1.5 miles to the west, which is not a contained body of water with seiche potential. Therefore, the Project would result in no impacts related to tsunamis and seiche zones. This topic will not be further analyzed in the EIR.

h) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Potentially Significant Impact. Implementation of the proposed Project would result in construction and operational activities on a partially developed site with existing oil wells. Such activities could potentially have an adverse effect on existing drainage patterns, which could subsequently impact surface water and groundwater quality, as well as both on-site and local hydrology conflicting with an existing plan. Therefore, this topic will be further analyzed in the EIR.

5.11. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Responses a) & b).

No Impact. Implementation of the proposed Project would not divide an established community. The 26.77-acre Project site is heavily disturbed and contains one, single-story office building on the western edge of the property and a canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. Currently, the Project site is designated as Industrial and zoned as M-2. The proposed Project would be consistent with the existing land use designation and zone. The Project site's surrounding areas are primarily industrial uses. Neither the land use nor zoning designations for the Project site allow for residential development. In addition, the proposed Project does not involve the development of roadways or other infrastructure that would divide a community. Therefore, the proposed Project would not have an impact on an established community and would not conflict with the existing General Plan and policies. As such, this topic will not be evaluated in the EIR.

5.12. MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☒	☐	☐	☐
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☒	☐	☐	☐

Responses a) & b).

Potentially Significant Impact. The 26.77-acre Project site is heavily disturbed and contains one, single-story office building on the western edge of the property and a canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. According to the City of Santa Fe Springs GP EIR, the City of Santa Fe Springs is primarily designated as MRZ-1 (City of Santa Fe Springs, 2021). MRZ-1 includes areas where geologic evidence indicates that there are no significant mineral deposits present or likely to exist. The western portion of the City is classified MRZ-3, meaning while these areas contain mineral deposits, there is inadequate available data to determine their significance. There are no portions of the City that are designated MRZ-2 or MRZ-4 (City of Santa Fe Springs, 2021). However, given that the Project site has a history of oil and gas extraction, there could be a loss of availability of a known mineral resource. Thus, this topic will be further evaluated in the forthcoming EIR.

5.13. NOISE

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☒	☐	☐	☐

Response a) through c).

Potentially Significant Impact. Implementation of the proposed Project would include the development of two industrial warehouse buildings with a total building area of 584,678 SF. Additional improvements to the site would include landscaping, utility connections, and pavement of parking areas and drive aisles. Project-related short-term construction activities, as well as long-term operational activities could expose persons and sensitive receptors in the vicinity to noise levels in excess of standards established by the City. Additionally, ground borne vibration and noise level increases could be associated with construction activities at the Project site, including demolition, grading, and building construction, and with associated hardscape and landscape improvements. Thus, a Noise Impact Analysis will be conducted to determine the significance of noise impacts as a result of the proposed Project and to identify mitigation measures as appropriate to reduce potential impacts. Therefore, the proposed Project could result in potentially significant impacts and impacts related to noise will be discussed further in the EIR.

5.14. POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a) Induce substantial unplanned population growth in an area, either directly or indirectly?

Less Than Significant Impact. The Project would result in an increase in employment at the Project site that could lead to a potential population increase in the surrounding area. According to the Southern California Association of Governments (SCAG), the generation rate for employees required for operation of an industrial project is 1 employee for every 1,518 SF of industrial space (Southern California Association of Governments, 2001). As the Project would build and operate two industrial warehouses totaling 584,678 SF, operation of the Project would require approximately 385 employees.

According to SCAG's 2024 RTP/SCS population and household growth forecast for Santa Fe Springs, between 2019 and 2050, SCAG anticipates an employment increase of 2,300 additional jobs (from 57,200 to 59,500), yielding a 4.02 percent growth rate (Southern California Association of Governments, 2024).

The proposed Project would generate the need for approximately 385 employees, which represents approximately 16.74 percent of the forecasted employment growth between 2019 and 2050 for the City. However, according to the Employment Development Department, as of March 2024, Santa Fe Spring's unemployment rate was approximately 8 percent (EDD, 2023). Thus, although the Project would generate additional long-term employment in the Project area, the new employment opportunities would also serve to decrease the City's unemployment rate. As such, the generation of new employees would be within the forecasted and planned growth of the City and the Project would result in a less than significant impact related to inducement of substantial unplanned population growth. Therefore this topic will not be further evaluated in the EIR.

b) Displace substantial numbers of existing people or housing, necessitating the construction

of replacement housing elsewhere?

No Impact. The 26.77-acre Project site is heavily disturbed and contains one, single-story office building on the western edge of the property and a canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. No residential structures exist on the Project site nor are they currently planned for future development of residential uses. Therefore, no impacts would occur, and this topic will not be evaluated in the EIR.

5.15. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☒	☐
iv) Parks?	☐	☐	☒	☐
v) Other public facilities?	☐	☐	☒	☐

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for:

i. Fire Protection and Emergency Services

Less Than Significant Impact. The City of Santa Fe Springs Department of Fire – Rescue services the residents of the City in an area of approximately 9 square miles. The Fire Department provides services including fire prevention and suppression, emergency medical services, and hazardous materials response. The Fire Department has four fire stations. The closest fire station to the Project site is Station No.4, located approximately 1.4 miles west of the Project site, at 11736 Telegraph Rd, Santa Fe Springs, CA 90670. Construction and operation of the proposed Project would result in an increased number of employees in the Project area; however, as previously mentioned, the Project would not directly or indirectly induce substantial population growth in the City. In addition, the Project would include new fire prevention infrastructure pursuant to current code requirements. The City has adopted the California Fire Code (Title 24, Part 9 of the California Code of Regulations) in Section 93.01 of the City Municipal Code, which regulates new structures related to safety provisions, emergency planning, fire-resistant construction, fire protection system, and appropriate emergency access throughout the site. Since the site is already served by the fire department, and the Project would be constructed pursuant to existing California Fire Code regulations, the Project would not result in the need for new or physically altered fire department facilities that could cause significant environmental impacts. Therefore, the Project would result in less than significant impacts related to fire protection services and this topic will not be evaluated in the EIR.

ii. Police Protection

Less Than Significant Impact. The City of Whittier Police Department provides policing services for the City of Santa Fe Springs under contract. The Police Services Center is located at 11576 Telegraph Road, Santa Fe Springs, CA 90670, approximately 1.2 miles west of the Project site. According to the City of Santa Fe Springs, the City is divided into three law enforcement public service areas which have a dedicated sergeant and a team of officers and public safety officers (City of Santa Fe Springs, 2021). More specifically, the City has a total of 35 sworn and 6 support personnel (City of Whittier, 2024). As discussed previously, the Project is not anticipated to directly or indirectly induce unplanned population growth in the City. Although

the Project could potentially result in a slight incremental increase in calls for service to the Project site compared to existing conditions, this increase is expected to be nominal (as opposed to new residential or commercial/retail land uses, which do result in greater increase in calls for service) and would not result in the need for new police protection facilities.

In summary, it is anticipated that the Project would be adequately served by existing Whittier Police Department facilities, equipment, and personnel. Therefore, impacts would be less than significant, and this topic will not be discussed in the EIR.

iii. School Services

Less Than Significant Impact. The proposed Project would develop a warehouse facility that would not directly generate students. As described previously, the Project is not anticipated to generate a new population, as the employees needed to operate the Project are anticipated to come from within the Project region and substantial in-migration of employees that could generate new students is not anticipated to occur. Thus, the Project would not generate the need for new or physically altered school facilities and impacts would be less than significant.

Additionally, pursuant to Government Code Section 65995 et seq., the need for additional school facilities is addressed through compliance with school impact fee assessment. SB 50 (Chapter 407 of Statutes of 1998) sets forth a state school facilities construction program that includes restrictions on a local jurisdiction's ability to condition a project on mitigation of a project's impacts on school facilities in excess of fees set forth in the Government Code. The Project would be required to contribute fees to the Little Lake City School District in accordance with the Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50), as included by PPP PS-1. Pursuant to Senate Bill 50, payment of school impact fees constitutes complete mitigation under CEQA for Project-related impacts to school services. Therefore, impacts would be less than significant, and this topic will not be discussed in the EIR.

iv. Parks

Less Than Significant Impact.

The proposed Project would develop two new industrial warehouses and does not include development of park facilities. In addition, as described previously, the proposed Project is not anticipated to result in an influx of new residents, as the employees needed to operate the proposed buildings are primarily anticipated to come from the unemployed labor force in the region. Thus, the proposed Project would not generate a substantial population that would require construction or expansion of park facilities, and impacts would be less than significant. This topic will not be further discussed in the EIR.

v. Other Public Facilities

Less Than Significant Impact. The proposed Project involves construction and operation of two new warehouse buildings and would not provide new housing opportunities to the area. The proposed Project is not likely to create a significant increase in the use of other public facilities such as libraries, community centers, post offices or animal shelters. Therefore, impacts would be less than significant, and this issue will not be addressed in the EIR.

Existing Plans, Programs, or Policies

PPP PS-1: School Fees: Prior to the issuance of either a certificate of occupancy or prior to building permit final inspection, the applicant shall provide payment of the appropriate fees set forth by the applicable school districts related to the funding of school facilities pursuant to Government Code Section 65995 et seq.

5.16. RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would be accelerated?

Less Than Significant Impact. The proposed Project would develop two industrial warehouse buildings and associated onsite infrastructure consisting of a total building area of 584,678 SF. Implementation of the proposed Project would not directly increase housing or population as the proposed Project does not propose any type of residential use or other land use which typically cause an increase in the demand for, and use of, existing neighborhood parks and other citywide recreational facilities. The closest park is Heritage Park, located approximately half a mile from the Project site. Although the proposed Project would generate new employees that may occasionally increase the use of existing local, neighborhood, and regional parks, employees' use of parks would be limited and would therefore not result in accelerated deterioration to facilities such that the construction or expansion of recreational facilities would be necessary. As such, impacts would be less than significant, and this topic will not be evaluated in the EIR.

B. Require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. As discussed above, the Project does not propose any residential facilities or other land use that would cause a direct increase in housing or the residential population. The indirect increase in population as a result of new employment opportunities would not result in additional use of recreational facilities sufficient to cause deterioration such that the construction or expansion of recreational facilities would be necessary. Therefore, the proposed Project would have no new impacts related to expansion of recreational facilities and this topic will not be evaluated in the EIR.

5.17. TRANSPORTATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☒	☐	☐	☐
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☒	☐	☐	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐
d) Result in inadequate emergency access?	☒	☐	☐	☐

Responses a) through d).

Potentially Significant Impact. The 26.77-acre Project site is heavily disturbed and contains one, single-story office building on the western edge of the property and a canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. The Project proposes to subdivide the 26.77-acre parcel into two parcels. The proposed Project would demolish the existing building and abandon the existing oil wells onsite in order to construct two new warehouse buildings. The proposed industrial warehouse buildings would consist of a combined total building area of 584,678 SF. Additional improvements to the site would include landscaping, sidewalks, and associated onsite infrastructure. Development of the Project site with new uses could result in an increase in vehicle trips from worker vehicles and truck activity, which may conflict with local plans, policies, or ordinances. In addition, the proposed Project would include new driveways and transportation improvements that could introduce new geometric design features that may be considered hazardous or incompatible with existing infrastructure or uses. A Vehicle Miles Traveled (VMT) Assessment will be prepared for the proposed Project to determine potential impacts related to VMT and identify mitigation measures as appropriate to reduce potential impacts. Additionally, the Project would result in on and offsite construction activities that could temporarily obstruct emergency access to the site and surrounding vicinity. Therefore, the proposed Project could result in potentially significant impacts and impacts related to transportation will be further addressed in the EIR.

5.18. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☒	☐	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☒	☐	☐	☐

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Potentially Significant Impact. The 26.77-acre Project site is heavily disturbed and contains one, single-story office building on the western edge of the property and a canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. Additional improvements would include landscaping, sidewalks, utility connections, implementation of stormwater drainage, and pavement of parking areas and drive aisles. Although partially developed and in use, the Project site could contain significant tribal cultural resources associated with historic uses of the property. Ground disturbance associated with Project construction could result in significant impacts to potential tribal cultural resources. A cultural resource study would be conducted to determine the significance of cultural resources on the Project site and identify mitigation measures as appropriate to reduce potential impacts. Additionally, the City will conduct consultation pursuant to Assembly Bill 52. The results of the Project's tribal consultation will be included in the EIR. The Project could result in potentially significant impacts; therefore, impacts to tribal cultural resources will be discussed further in the EIR.

5.19. UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☒	☐	☐	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☒	☐	☐	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☒	☐	☐	☐
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☒	☐	☐	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☒	☐	☐	☐

Responses a) through e).

Potentially Significant Impact. The Project site is heavily disturbed and contains one, single-story office building on the western edge of the property and a canopy structure to the northeast of the building used to cover construction equipment; the remainder of the site consists of vacant land utilized for oil and gas extraction. The Project would demolish the existing building and abandon the existing oil wells onsite in order to construct two new warehouse buildings with a combined total building area of 584,678 SF. As described in Section 3.0, *Project Description*,he Project proposes to construct on-site water and sewer lines as well as an on-site drainage system. The Project would require water supplies which would be provided by the City of Santa Fe Springs. Water demand from the proposed Project would be quantified and compared to the current and Projected water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Once operational, the Project would generate wastewater which would be conveyed through existing sewer facilities to be treated at the Los Coyotes Water Reclamation Plant (WRP). To ensure Project wastewater treatment capacity needs can be met, further analysis is required. Solid waste from construction and operation of the Project would be collected and sent to either the Olinda Alpha Sanitary Landfill, El Sobrante Landfill, or Sunshine Canyon Landfill. To ensure landfill capacity needs can be met, further analysis is required. Impacts associated with the capacity of existing water, sewer and stormwater drainage facilities, or the required expansion of existing facilities, could be potentially significant and will be further evaluated in the EIR.

5.20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. According to the CalFire Hazard Severity Zone Map, the Project is not within a State Responsibility Area (SRA), California Fire Hazard Severity Zone (FHSZ), or Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE, 2023). The proposed Project would provide adequate emergency access to the site via two ingress and egress driveways from Telegraph Road and Hawkins Street. Telegraph Road and Santa Fe Springs Road are both designated as evacuation routes. However, the proposed Project does not include any characteristics (e.g., permanent road closures or long-term blocking of road access) that would substantially impair or otherwise conflict with an emergency response plan or emergency evacuation plan. Further, the proposed Project would not obstruct or alter any transportation routes that could be used as evacuation routes during emergency events as the proposed Project would be required through the City's permitting process to implement appropriate measures to facilitate vehicle circulation, as included within construction permits. Thus, implementation of the Project through the City's permitting process would ensure existing regulations are adhered to and potential construction-related emergency access or evacuation impacts would be less than significant.

The proposed Project would provide adequate emergency access to the site via two new driveways from Telegraph Road and Santa Fe Springs Road. The driveway on Hawkins Street would be accessible by trucks and the driveway on Telegraph Road would be accessible by passenger vehicles. The proposed Project would also include a 26-foot-wide fire access road throughout the site. Project driveways and internal access would be consistent with the City's permitting procedures to meet the City's design standards, stated in the City of Santa Fe Springs Municipal Code Section 155.244, Property Development Standards to ensure adequate emergency access and evacuation. The proposed Project would also be required to provide fire suppression facilities (e.g., hydrants and sprinklers). The Office of the Fire Marshal and/or Engineering Department would review the development plans as part of the permitting procedures to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). Thus, the proposed Project would not impair implementation of or

physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant. As such, this topic will not be further evaluated in the forthcoming EIR.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. As described in the previous response, the Project is not within a VHFHSZ. Additionally, there are no areas within a VHFHSZ within the City of Santa Fe Springs. The Project site and adjacent areas are sparsely vegetated, urbanized, and do not contain other major factors that could exacerbate wildfire risks. The Project site is in a flat area that does not contain or is adjacent to large slopes, and the proposed Project would not generate large slopes. Implementation of the proposed Project would be required to adhere to the California Fire Code, as adopted by the Santa Fe Springs Fire Department, and would be reviewed by the City's Building Department during the permitting process to ensure that the Project plans meet the fire protection requirements. The Project site does not include any slopes or prevailing winds that would exacerbate fire risks. Therefore, the Project would result in less than significant impacts related to exposure of people or structures to significant risk involving wildland fires and will not be further evaluated in the EIR.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less Than Significant Impact. As described in the previous responses, the Project site is not within a VHFHSZ. The Project does not include infrastructure that would exacerbate fire risk. Although the Project includes new driveways for access to the buildings within the Project site and the extension of Hawkins Street, the Project would be compliant with all applicable design standards and regulations. Although utility improvements, including domestic water and sewer are proposed as part of the Project, these utility improvements would be largely underground and would not exacerbate fire risk. Project design and implementation of utility improvements would be reviewed and approved by the City as part of the Project approval process to ensure the proposed Project is compliant with all applicable design standards and regulations. Therefore, the proposed Project would not include infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities), that would exacerbate fire risk or that would result in significant impacts to the environment and this topic will not be further evaluated in the EIR.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. As described in the previous responses, the Project is not within a VHFHSZ. In addition, the Project site is located in a flat area that does not contain or is adjacent to large slopes, and the Project would not generate large slopes. Thus, the project would not result in risks related to wildfires or risks related to downslope or downstream flooding or landslides after wildfires. Thus, this topic will not be further evaluated in the EIR.

5.21. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☒	☐	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact. Development of the proposed Project would have a less than significant impact on habitat of a fish or wildlife species or rare, endangered species of plant or animal, or plant or animal communities as discussed in Section 5.4, Biological Resources, of this document. As previously stated, a site-specific biological resources assessment was prepared for the Project site which determined that no sensitive animal or plant species were identified on site nor suitable habitat. However, pursuant to the MBTA, Mitigation Measure BIO-1 has been included to require that if commencement of vegetation clearing occurs between February 1 and September 15, a qualified biologist shall conduct a nesting bird survey no more than 3 days prior to commencement of activities to confirm the absence of nesting birds. With implementation of Mitigation Measure BIO-1, any potential impacts to nesting birds would be less than significant. Therefore, the EIR will not further evaluate whether the Project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal. This topic will not be carried forward in the EIR.

As discussed within Section 5.5, *Cultural Resources*, the Project site would not impact historic resources and there is a low potential for archaeological resources onsite that could be damaged or removed during Project construction. However, implementation of MM CUL-1 would reduce potential impacts to

archaeological resources to a less than significant level. Therefore, this topic will not be carried forward and analyzed further in the EIR.

As described in Section 5.7, *Geology and Soils*, the Project site has the potential to contain paleontological resources that could be damaged or removed during Project construction. Therefore, this topic will be carried forward and analyzed further in the EIR.

Formal consultation pursuant to Assembly Bill 52 (AB 52) will be carried out by the City of Santa Fe Springs to identify potential tribal cultural resources or sites that could be impacted by the Project. A discussion of AB 52 consultation will be provided under the Tribal Cultural Resources section of the EIR. This topic will be carried forward in the EIR.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Potentially Significant Impact. Cumulative impacts are defined as two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor, but collectively significant, developments taking place over a period. The CEQA Guidelines, Section 15130 (a) and (b), states:

a) Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.

The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.

As described above, the Project would construct an industrial warehouse facility consisting of two buildings and related improvements. As presented in this document, potential Project-related impacts are less than significant for the following topics:

- Aesthetics
- Agricultural Resources
- Biological Resources
- Cultural Resources
- Land Use and Planning
- Population and Housing
- Public Services
- Recreation
- Wildfire

Given that the potential Project-related impacts of the topics listed above would be less than significant or mitigated to a less than significant level, implementation of the proposed Project would not result in impacts that are cumulatively considerable when evaluated with the impacts of other current projects, or the effects of probable future projects for the identified topic areas. Therefore, the proposed Project's contribution to significant cumulative impacts would be less than cumulatively considerable.

Based on the discussion provided in this Initial Study, the Project has the potential to result in significant impacts, and further, could result in cumulative impacts to:

- Air Quality
- Energy
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Mineral Resources
- Noise
- Transportation
- Tribal Cultural Resources
- Utilities

The extent and significance of potential cumulative impacts resulting from the combined effects of the proposed Project plus other past, present, and reasonably foreseeable future Projects will be evaluated in the EIR.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. The development of the site into an industrial warehouse facility could directly or indirectly cause substantial adverse effects on human beings if not properly mitigated. The proposed Project could result in impacts to air quality, greenhouse gas, and noise, which could result in adverse effects on human beings. Therefore, these impacts will be addressed in the EIR, and mitigation measures will be recommended as appropriate.

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

NOTICE OF PREPARATION AND SCOPING MEETING

Date: May 13, 2024

To: Responsible Agencies, Trustee Agencies, and Interested Parties

Lead Agency: City of Santa Fe Springs

Subject: Notice of Preparation of a Draft Environmental Impact Report for the NWC Telegraph and Santa Fe Springs Project

Public Review: May 13, 2024, to June 12, 2024

Project Title: NWC Telegraph and Santa Fe Springs

Project Applicant: Bridgeland Resources, LLC

Notice of Preparation of a Draft Environmental Impact Report (Draft EIR): The City of Santa Fe Springs (City) will be the Lead Agency and will be responsible for the preparation of a Draft EIR pursuant to the California Environmental Quality Act (CEQA) for the proposed NWC Telegraph and Santa Fe Spring Project (Project). The City has prepared an Initial Study and determined that an EIR is required for the Project based on its potential to cause significant environmental effects (State CEQA Guidelines Section 15-6- and 15081). The City is requesting your review and comments as to the scope and content of the forthcoming EIR.

Due to limits mandated by State law, your response must be received at the earliest possible date, but not later than 30 days after receipt of this NOP. The public comment period for this NOP begins on May 13, 2024, and is set to close at 5:00 p.m. on June 12, 2024.
Please send written comments to Jimmy Wong, Associate Planner, at the address shown below or via email to jimmywong@santafesprings.org. Please include the name and contact person of the agency or organization.

Agencies: The City requests your review on the scope and content of the environmental information relevant to your agency's statutory responsibilities in connection with the proposed Project, in accordance with California Code of Regulations, Title 14, Section 15082(b). Your agency will need to use the EIR prepared by the City when considering any permits that your agency must issue, or other approval for the project.

Organizations and Interested Parties: The City requests your comments and concerns regarding the environmental issues associated with implementation of the proposed Project.

Project Information.

Location and Setting: The proposed Project is located within the central portion of the City of Santa Fe Springs, at the northwest corner of Santa Fe Springs Road and Telegraph Road. 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 and surrounding areas are shown in Figure 1, *Local Vicinity*, and Figure 2, *Aerial View*.

The Project site consists of one parcel encompassing approximately 26.77 acres and is identified by Assessor's Parcel Number (APN) 8005-015-05. The Project site has a General Plan land use designation of Industrial, and a zoning designation of Heavy Manufacturing (M-2).

Project Description: The Project proposes to subdivide the approximately 26.77-acre parcel into two parcels. The applicant for the proposed Project is requesting approval from the City of Santa Fe Springs to demolish the existing building onsite, abandon the existing onsite oil wells, and to 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 following discretionary actions are required as part of the Project:

- Tentative Parcel Map
- Development Plan Approval

Probable Environmental Effects of the Scoping Meeting: Pursuant to CEQA Guidelines Section 15082(c) (Notice of Preparation and Determination of Scope of EIR), the City will conduct a scoping meeting for the purpose of soliciting comments of adjacent cities, responsible agencies, trustee agencies, and interested parties requesting notice as to the appropriate scope and content of the Draft EIR.

The purpose of the meeting is to present the Project and environmental topics in a public setting and provide an opportunity for the City to hear from the community and interested agencies on what potential environmental issues are important to them. The meeting will include a brief presentation of the proposed Project, the EIR process, and the topics to be analyzed in the EIR. Following the presentation, interested agencies, organizations, and members of the public will be encouraged to offer their views concerning what environmental issues should be included in the DEIR.

The Public Scoping Meeting will be held on the following date, time, and location:

Date: May 22, 2024
Time: 5:30 PM
Location: Santa Fe Springs City Council Chambers
11710 East Telegraph Road
Santa Fe Springs, California 90670

Response to this Notice of Preparation: The Initial Study and NOP are available for public review on the City's website at

https://www.santafesprings.org/departments/planning_and_development_department/planning/environmental_documents.php

or at City offices at 11710 East Telegraph Road, Santa Fe Springs, California 90670.

Please provide written comments no later than 30 days from the receipt of this NOP. According to Section 15082(b) of the State CEQA Guidelines, your comments should address the scope and content of environmental information related to your agency's area of statutory responsibility. More specifically, your response should identify the significant environmental issues and reasonable alternatives and mitigation measures that you or your agency will need to have explored in the Draft EIR; and, whether your agency will be a responsible agency or a trustee agency, as defined by CEQA Code Sections 15381 and 15386, respectively. Please return all comments to the following address or email:

Jimmy Wong, Associate Planner
City of Santa Fe Springs Planning Department
11710 East Telegraph Road
Santa Fe Springs, California 90670
Or via email to jimmywong@santafesprings.org

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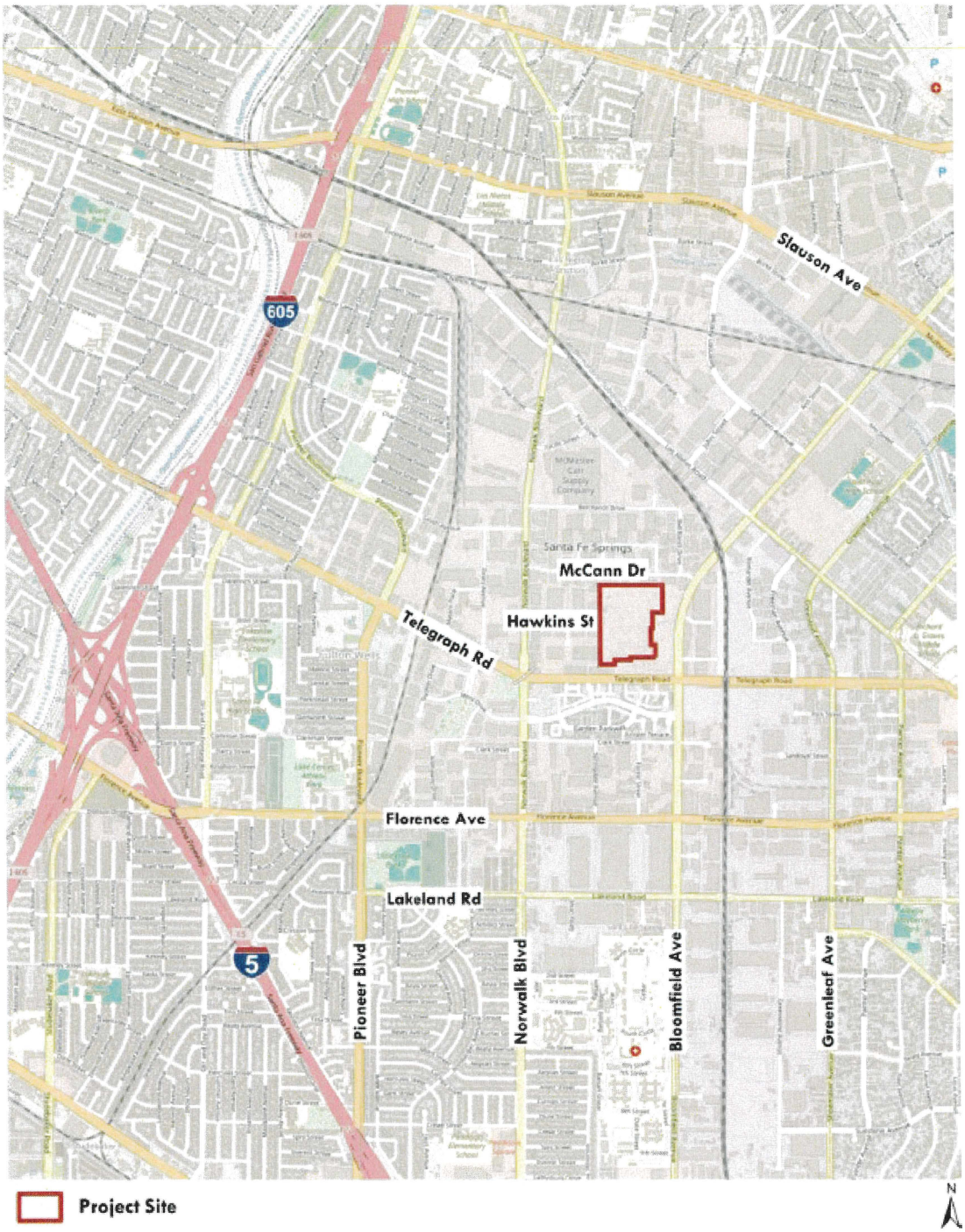
Jay Sarno, Mayor • William K. Rounds, Mayor Pro Tem
City Council
Juanita Martin • Annette Rodriguez • Joe Angel Zamora
City Manager
René Bobadilla, PE, City Manager

Figure 1: Local Vicinity



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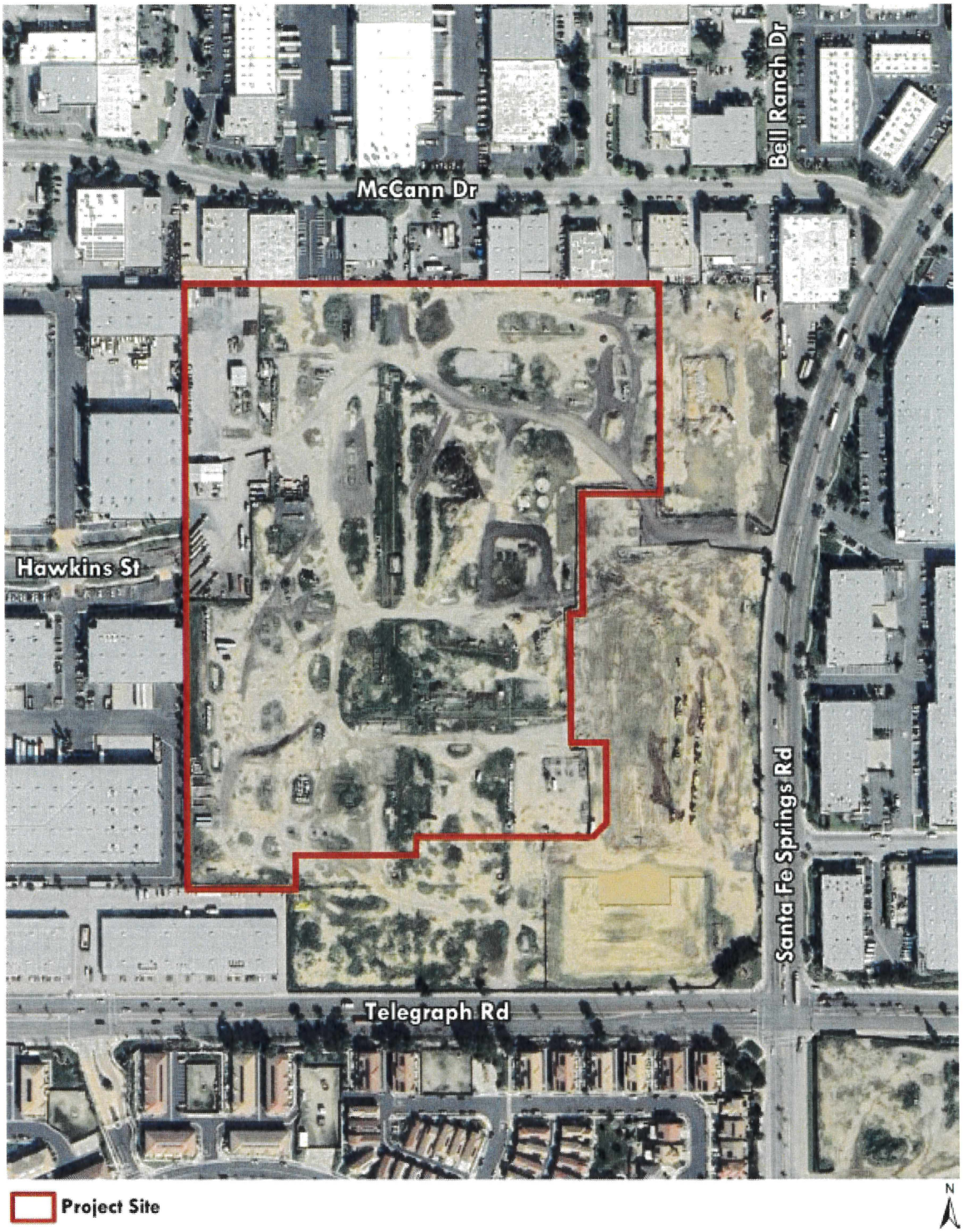
Jay Sarno, Mayor • William K. Rounds, Mayor Pro Tem
City Council
Juanita Martin • Annette Rodriguez • Joe Angel Zamora
City Manager
René Bobadilla, PE, City Manager

Figure 2: Aerial View



ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE

1300 I STREET, SUITE 125
P.O. BOX 944255
SACRAMENTO, CA 94244-2550

E-Mail: EJ@doj.ca.gov

May 31, 2024

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

RE: NWC Telegraph and SFS, SCH #2024050495

Dear Mr. Wong:

Thank you for the opportunity to provide comments on the Notice of Preparation for the NWC Telegraph and SFS project. While the logistics industry is an important component of our modern economy, warehouses can bring various environmental impacts to the communities where they are located. For example, diesel trucks visiting warehouses emit nitrogen oxide (NO_x)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.[1] Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.[2] The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate can contribute to traffic jams, deterioration of road surfaces, traffic accidents, and unsafe conditions for pedestrians and bicyclists. Depending on the circumstances of an individual project, warehouses may also have other environmental impacts.

To help lead agencies avoid, analyze, and mitigate warehouses' environmental impacts, the Attorney General Office's Bureau of Environmental Justice has published a document containing best practices and mitigation measures for warehouse projects. We have attached a

[1] California Air Resources Board, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health (NOx); California Air Resources Board, Summary: Diesel Particular Matter Health Impacts, https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts; Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf (DPM).

[2] Noise Sources and Their Effects, https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

copy of this document to this letter, and it is also available online.[3] We encourage you to consider the information in this document as you prepare the draft environmental impact report for this project.

Priority should be placed on avoiding land use conflicts between warehouses and sensitive receptors and on mitigating the impacts of any unavoidable land use conflicts. However, even projects located far from sensitive receptors may contribute to harmful regional air pollution, so you should consider measures to reduce emissions associated with the project to help the State meet its air quality goals. A distant warehouse may also impact sensitive receptors if trucks must pass near sensitive receptors to visit the warehouse.

The Bureau will continue to monitor proposed warehouse projects for compliance with the California Environmental Quality Act and other laws. We are available to discuss as you prepare the draft environmental impact report and consider how to guide warehouse development in your jurisdiction. Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.

Sincerely,

CHRISTIE VOSBURG
Supervising Deputy Attorney General

For ROB BONTA
Attorney General

[3] https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 266-3562
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life

June 12, 2024

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

RE: NWC Telegraph and SFS: Notice of Preparation (NOP)
GTS # 07-LA-2024-04534
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).

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

To meet the goals and objectives of community placemaking and safe urban design, Caltrans encourages the Lead Agency to incorporate multi-modal infrastructure along and within the site for people walking, riding bicycles, and riding transit. 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.

The Transportation Section of the Initial Study has declared that the project may have potentially significant transportation impacts, therefore Caltrans requests that a multi-modal conflict/safety analysis be performed across the project and the following intersections:

- NB Route 5 off-ramp and Rosecrans Avenue Intersection.
- SB Route 605 off-ramp segment and Florence Intersection.
- NB Route 605 off-ramp and Telegraph Road Intersection.
- SB Route 605 off-ramp and Slauson Intersection.
- SB Route 605 off-ramp and Saragosa Street/Pioneer Boulevard (Washington Boulevard off-ramp) Intersection.
- Route 72(Whittier Blvd.) and Washington Blvd. /Santa Fe Springs Road/Pickering Avenue Intersection.
- Route 72 and Painter Avenue Intersection.

If any safety impacts are found, they should be addressed with Transportation Demand Management (TDM) and Transportation System Management (TSM) mitigation measures.

Caltrans will require an Encroachment Permit for work performed within the State Right-of-way. Caltrans recommends that large-size truck travel be limited to off-peak commute hours. Caltrans requires a permit for any heavy construction equipment and or materials that require the use of oversized transport vehicles on State highways.

Caltrans recommends that the Project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans' review.

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-2024-04534.

Sincerely,

Anthony Higgins

Anthony Higgins
Acting LDR/CEQA Branch Chief

cc: State Clearinghouse

NATIVE AMERICAN HERITAGE COMMISSION

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

May 13, 2024

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

Re: 2024050495, North West Corner of Telegraph and Sante Fe Springs Project, Los Angeles County

Dear Mr. Wong:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
   - **a.** A brief description of the project.
   - **b.** The lead agency contact information.
   - **c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
   - **d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
   - **a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
   - **a.** Alternatives to the project.
   - **b.** Recommended mitigation measures.
   - **c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
   - **a.** Type of environmental review necessary.
   - **b.** Significance of the tribal cultural resources.
   - **c.** Significance of the project's impacts on tribal cultural resources.
   - **d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
   - **a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
   - **b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:

i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

i. Protecting the cultural character and integrity of the resource.

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.

b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
   a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
   b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
   a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
   b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
   c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@NAHC.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

LOZEAU DRURY LLP
T 510.836.4200
F 510.836.4205
1939 Harrison Street, Ste. 150
Oakland, CA 94612
www.lozeaudrury.com
richard@lozeaudrury.com

Via Email

May 21, 2024

Jimmy Wong, Associate Planner
City of Santa Fe Springs Planning Department
11710 East Telegraph Road
Santa Fe Springs, California 90670
jimmywong@santafesprings.org

Janet Martinez, City Clerk
City of Santa Fe Springs City Clerk
11710 E. Telegraph Road
Santa Fe Springs, CA 90670
cityclerk@santafesprings.org

Re: CEQA and Land Use Notice Request for the NWC Telegraph and Santa Fe Springs Project

Dear Mr. Wong and Ms. Martinez,

I am writing on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the NWC Telegraph and Santa Fe Springs Project, including all actions related or referring to the construction of two new warehouse buildings, an approximately 298,373 square foot warehouse building and an approximately 286,305 square foot warehouse building, located at the northwest corner of Santa Fe Springs Road and Telegraph Road in the City of Santa Fe Springs ("Project").

We hereby request that the City of Santa Fe Springs ("City") send by electronic mail, if possible or U.S. mail to our firm at the address below notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City and any of its subdivisions, and/or supported, in whole or in part, through contracts, grants, subsidies, loans or other forms of assistance from the City, including, but not limited to the following:

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.
- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act ("CEQA"), including, but not limited to:
  - Notices of any public hearing held pursuant to CEQA.
  - Notices of determination that an Environmental Impact Report ("EIR") is required for the Project, prepared pursuant to Public Resources Code Section 21080.4.
  - Notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.
  - Notices of preparation of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21092.
  - Notices of availability of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations.
  - Notices of approval and/or determination to carry out the Project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
  - Notices of any addenda prepared to a previously certified or approved EIR.

- Notices of approval or certification of any EIR or negative declaration, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of determination that the Project is exempt from CEQA, prepared pursuant to Public Resources Code section 21152 or any other provision of law.
- Notice of any Final EIR prepared pursuant to CEQA.
- Notice of determination, prepared pursuant to Public Resources Code Section 21108 or Section 21152.

Please note that we are requesting notices of CEQA actions and notices of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law. **This request is filed pursuant to Public Resources Code Sections 21092.2 and 21167(f), and Government Code Section 65092**, which require local counties to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

Please send notice by electronic mail or U.S. Mail to:

Richard Drury
Madeline Dawson
Layne Fajeau
Chase Preciado
Lozeau Drury LLP
1939 Harrison Street, Suite 150
Oakland, CA 94612
richard@lozeaudrury.com
madeline@lozeaudrury.com
layne@lozeaudrury.com
Chase@lozeaudrury.com

Please call if you have any questions. Thank you for your attention to this matter.

Sincerely,

Madeline Dawson

Madeline Dawson
Lozeau | Drury LLP

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL: June 12, 2024

jimmywong@santafesprings.org
Jimmy Wong, Associate Planner
City of Santa Fe Springs Planning Department
11710 East Telegraph Road
Santa Fe Springs, CA 90670

Notice of Preparation of a Draft Environmental Impact Report for the NWC Telegraph and Santa Fe Springs (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses (electronic versions of all emission calculation spreadsheets, air quality modeling, and health risk assessment input and output files, not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website[1] as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod[2] land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds [3] and localized significance thresholds (LSTs)[4] to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle

[1] South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.
[2] CalEEMod is available free of charge at: www.caleemod.com.
[3] South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf
[4] South Coast AQMD's guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA ***operational*** thresholds to determine the level of significance.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*[5] is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory[6].

The South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*[7] includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. It is recommended that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.

South Coast AQMD staff is concerned about potential public health impacts of siting warehouses within close proximity of sensitive land uses, especially in communities that are already heavily affected by the existing warehouse and truck activities. The South Coast AQMD's Multiple Air Toxics Exposure Study (MATES V), completed in August 2021, concluded that the largest contributor to cancer risk from air pollution is diesel particulate matter (DPM) emissions[8]. According to the MATES V carcinogenic risk interactive map, the area surrounding the Proposed Project has an estimated cancer risk of over 520 in one million[9]. Operation of warehouses generates and attracts heavy-duty diesel-fueled trucks that emit DPM. When the health impacts from the Proposed Project are added to those existing impacts, residents living in the communities surrounding the Proposed Project will possibly face an even greater exposure to air pollution and bear a disproportionate burden of increasing health risks.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South

[5] CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf.
[6] CARB's technical advisory can be found at: https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf.
[7] South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf.
[8] South Coast AQMD. August 2021. *Multiple Air Toxics Exposure Study in the South Coast Air Basin V*. Available at: http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v.
[9] South Coast AQMD. MATES V Data Visualization Tool. Accessed at: MATES Data Visualization (arcgis.com).

Coast AQMD's CEQA Air Quality Handbook,[10] South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,[11] and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.[12].

Mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Draft EIR may include the following:

- Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks such as the Advanced Clean Trucks Rule[13] and the Heavy-Duty Low NOx Omnibus Regulation[14], ZE and NZE trucks will become increasingly more available to use. The Lead Agency should require a phase-in schedule to incentivize the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency. At a minimum, require the use of 2010 model year[15] that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
- Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

[10] https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook

[11] South Coast AQMD's 2022 Air Quality Management Plan can be found at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan (Chapter 4 - Control Strategy and Implementation).

[12] Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

[13] CARB. June 25, 2020. *Advanced Clean Trucks Rule.* Accessed at: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks.

[14] CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox.

[15] CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm.

Mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider in the Draft EIR may include the following:

- Maximize use of solar energy by installing solar energy arrays.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

Design considerations for the Proposed Project that the Lead Agency should consider to further reduce air quality and health risk impacts include the following:

- Clearly mark truck routes with trailblazer signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).
- Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that there are no trucks queuing outside.
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

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 two warehouses for more than 200-square-foot each, 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 Project that may help future warehouse operators meet their compliance obligation [16]. 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

[16] 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.

implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage[17].

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at swang1@aqmd.gov.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW
LAC240522-08
Control Number

[17] South Coast AQMD WAIRE Program. Accessed at: http://www.aqmd.gov/waire.

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ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE

Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act

Table of Contents

In carrying out its duty to enforce laws across California, the California Attorney General's Bureau of Environmental Justice (Bureau)[1] regularly reviews proposed warehouse projects for compliance with the California Environmental Quality Act (CEQA) and other laws. When necessary, the Bureau submits comment letters to lead agencies regarding warehouse projects, and in rare cases the Bureau has filed litigation to enforce CEQA.[2] This document builds upon the Bureau's work on warehouse projects, collecting information gained from the Bureau's review of hundreds of warehouse projects across the state.[3] It is meant to help lead agencies pursue CEQA compliance and promote environmentally-just development as they confront warehouse project proposals.[4] While CEQA analysis is necessarily project-specific, this document provides information on feasible best practices and mitigation measures, nearly all of which have been adapted from actual warehouse projects in California.

I. Background

In recent years, the proliferation of e-commerce and rising consumer expectations of rapid shipping have contributed to a boom in warehouse development.[5] California, with its ports, population centers, and transportation network, has found itself at the center of this trend. In 2020, the Ports of Los Angeles, Long Beach, and Oakland collectively accounted for over 34% of all United States international container trade.[6] The Ports of Los Angeles and Long Beach alone generate about 35,000 container truck trips every day.[7] Accordingly, the South Coast Air Basin now contains approximately 3,000 warehouses of over 100,000 square feet each, with a total warehouse capacity of approximately 700 million square feet, an increase of 20 percent over the last five years.[8] This trend has only accelerated, with e-commerce growing to

[1] https://oag.ca.gov/environment/justice.
[2] https://oag.ca.gov/environment/ceqa; *People of the State of California v. City of Fontana* (Super. Ct. San Bernardino County, No. CIVSB2121829); *South Central Neighbors United et al. v. City of Fresno et al.* (Super. Ct. Fresno County, No. 18CECG00690).
[3] This September 2022 version revises and replaces the prior March 2021 version of this document.
[4] Anyone reviewing this document to determine CEQA compliance responsibilities should consult their own attorney for legal advice.
[5] As used in this document, "warehouse" or "logistics facility" is defined as a facility consisting of one or more buildings that stores cargo, goods, or products on a short- or long-term basis for later distribution to businesses and/or retail customers.
[6] Data from the Bureau of Transportation Statistics, Container TEUs (Twenty-foot Equivalent Units) (2020), https://data.bts.gov/stories/s/Container-TEU/x3fb-aeda/ (Ports of Los Angeles, Long Beach, and Oakland combined for 14.157 million TEUs, 34% of 41.24 million TEUs total nationwide) (last accessed September 18, 2022).
[7] U.S. Dept. of Transportation, Federal Highway Administration, *FHWA Operations Support – Port Peak Pricing Program Evaluation* (2020), available at https://ops.fhwa.dot.gov/publications/fhwahop09014/sect2.htm (last accessed September 18, 2022).
[8] South Coast Air Qual. Mgmt. Dist., *Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305*, at 7-8, 41 (May 2021).

13% of all retail sales and 2021 being a second consecutive record year for new warehouse space leased.[9] The latest data and forecasts predict that the next wave of warehouse development will be in the Central Valley.[10]

When done properly, these activities can contribute to the economy and consumer welfare. However, imprudent warehouse development can harm local communities and the environment. Among other pollutants, diesel trucks visiting warehouses emit nitrogen oxide (NO_x)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.[11] Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.[12] The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate contribute to traffic jams, deterioration of road surfaces, and traffic accidents.

These environmental impacts also tend to be concentrated in neighborhoods already suffering from disproportionate health impacts and systemic vulnerability. For example, a comprehensive study by the South Coast Air Quality Management District found that communities located near large warehouses scored far higher on California's environmental justice screening tool, which measures overall pollution and demographic vulnerability.[13] That

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[9] U.S. Census Bureau News, Quarterly Retail E-Commerce Sales 4th Quarter 2021 (February 22, 2022), https://www.census.gov/retail/mrts/www/data/pdf/ec_current.pdf (last accessed September 18, 2022); CBRE Research, *2022 North America Industrial Big Box Report: Review and Outlook*, at 2-3 (March 2022), *available at* https://www.cbre.com/insights/reports/2022-north-america-industrial-big-box#download-report (last accessed September 18, 2022).

[10] CBRE Research, *supra note* 9, at 4, 36; New York Times, *Warehouses Are Headed to the Central Valley, Too* (Jul. 22, 2020), *available* at https://www.nytimes.com/2020/07/22/us/coronavirus-ca-warehouse-workers.html.

[11] California Air Resources Board, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health (last accessed September 18, 2022) (NOx); California Air Resources Board, Summary: Diesel Particular Matter Health Impacts, https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts (last accessed September 18, 2022); Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf (last accessed September 18, 2022) (DPM).

[12] Noise Sources and Their Effects, https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm (last accessed September 18, 2022) (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

[13] South Coast Air Quality Management District, "Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305" (May 2021), at 4-5.

study concluded that, compared to the South Coast Air Basin averages, communities in the South Coast Air Basin near large warehouses had a substantially higher proportion of people of color; were exposed to more diesel particulate matter; had higher rates of asthma, cardiovascular disease, and low birth weights; and had higher poverty and unemployment rates.[14] Each area has its own unique history, but many of these impacts and vulnerabilities reflect historic redlining practices in these communities, which devalued land and concentrated poverty, racial outgroups, and pollution into designated areas.[15]

II. Proactive Planning: General Plans, Local Ordinances, and Good Neighbor Policies

To systematically guide warehouse development, we encourage local governing bodies to proactively plan for logistics projects in their jurisdictions. Proactive planning allows jurisdictions to prevent land use conflicts before they materialize and direct sustainable development. Benefits also include providing a predictable business environment, protecting residents from environmental harm, and setting consistent expectations jurisdiction-wide.

Proactive planning can take many forms. Land use designation and zoning decisions should channel development into appropriate areas. For example, establishing industrial districts near major highway and rail corridors but away from sensitive receptors[16] can help attract investment while avoiding conflicts between warehouse facilities and residential communities. Transition zones with lighter industrial and commercial land uses may also help minimize conflicts between residential and industrial uses.

In addition, general plan policies, local ordinances, and good neighbor policies should set minimum standards for logistics projects. General plan policies can be incorporated into existing economic development, land use, circulation, or other related general plan elements. Many jurisdictions alternatively choose to consolidate policies in a separate environmental justice element. Adopting general plan policies to guide warehouse development may also help

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[14] *Id*. at 5-7.

[15] Beginning in the 1930s, federal housing policy directed investment away from Black, immigrant, and working-class communities by color-coding neighborhoods according to the purported "riskiness" of loaning to their residents. In California cities where such "redlining" maps were drawn, nearly all of the communities where warehouses are now concentrated were formerly coded "red," signifying the least desirable areas where investment was to be avoided. *See* University of Richmond Digital Scholarship Lab, Mapping Inequality, https://dsl.richmond.edu/panorama/redlining/#loc=12/33.748/-118.272&city=los-angeles-ca (Los Angeles), https://dsl.richmond.edu/panorama/redlining/#loc=13/32.685/-117.132&city=san-diego-ca (San Diego), https://dsl.richmond.edu/panorama/redlining/#loc=11/37.81/-122.38&city=oakland-ca (Oakland), https://dsl.richmond.edu/panorama/redlining/#loc=13/37.956/-121.326&city=stockton-ca (Stockton), https://dsl.richmond.edu/panorama/redlining/#loc=12/36.751/-119.86&city=fresno-ca (Fresno) (all last accessed September 18, 2022).

[16] In this document, "sensitive receptors" refers to residences, schools, public recreation facilities, health care facilities, places of worship, daycare facilities, community centers, or incarceration facilities.

jurisdictions comply with their obligations under SB 1000, which requires local government general plans to identify objectives and policies to reduce health risks in disadvantaged communities, promote civil engagement in the public decision making process, and prioritize improvements and programs that address the needs of disadvantaged communities.[17]

Local ordinances and good neighbor policies that set development standards for all warehouses in the jurisdiction are a critical and increasingly common tool that serve several goals. When well-designed, these ordinances direct investment to local improvements, provide predictability for developers, conserve government resources by streamlining project review processes, and reduce the environmental impacts of industrial development. While many jurisdictions have adopted warehouse-specific development standards, an ordinance in the City of Fontana provides an example to review and build upon.[18] Good neighbor policies in Riverside County and by the Western Riverside Council of Government include additional measures worth consideration.[19]

The Bureau encourages jurisdictions to adopt their own local ordinances that combine the strongest policies from those models with measures discussed in the remainder of this document.

III. Community Engagement

Early and consistent community engagement is central to establishing good relationships between communities, lead agencies, and warehouse developers and tenants. Robust community engagement can give lead agencies access to community residents' on-the-ground knowledge and information about their concerns, build community support for projects, and develop creative solutions to ensure new logistics facilities are mutually beneficial. Examples of best practices for community engagement include:

- Holding a series of community meetings at times and locations convenient to members of the affected community and incorporating suggestions into the project design.
- Posting information in hard copy in public gathering spaces and on a website about the project. The information should include a complete, accurate project description, maps and drawings of the project design, and information about how the public can provide input and be involved in the project approval process. The

[17] For more information about SB 1000, *see* https://oag.ca.gov/environment/sb1000.
[18] https://oag.ca.gov/system/files/attachments/press-docs/Final%20Signed%20Fontana%20Ordinance.pdf (last accessed September 18, 2022).
[19] For example, the Riverside County policy requires community benefits agreements and supplemental funding contributions toward additional pollution offsets, and the Western Riverside Council of Governments policy sets a minimum buffer zone of 300 meters between warehouses and sensitive receptors. https://www.rivcocob.org/wp-content/uploads/2020/01/Good-Neighbor-Policy-F-3-Final-Adopted.pdf (last accessed September 18, 2022) (Riverside County); http://www.wrcog.cog.ca.us/DocumentCenter/View/318/Good-Neighbor-Guidelines-for-Siting-Warehouse-Distribution-Facilities-PDF?bidId= (last accessed September 18, 2022) (Western Riverside Council of Governments).

information should be in a format that is easy to navigate and understand for members of the affected community.

- Providing notice by mail to residents and schools within a certain radius of the project and along transportation corridors to be used by vehicles visiting the project, and by posting a prominent sign on the project site. The notice should include a brief project description and directions for accessing complete information about the project and for providing input on the project.
- Providing translation or interpretation in residents' native language, where appropriate.
- For public meetings broadcast online or otherwise held remotely, providing for access and public comment by telephone and supplying instructions for access and public comment with ample lead time prior to the meeting.
- Partnering with local community-based organizations to solicit feedback, leverage local networks, co-host meetings, and build support.
- Considering adoption of a community benefits agreement, negotiated with input from affected residents and businesses, by which the developer provides benefits to the affected community.
- Creating a community advisory board made up of local residents to review and provide feedback on project proposals in early planning stages.
- Identifying a person to act as a community liaison concerning on-site construction activity and operations, and providing contact information for the community liaison to the surrounding community.
- Requiring signage in public view at warehouse facilities with contact information for a local designated representative for the facility operator who can receive community complaints, and requiring any complaints to be answered by the facility operator within 48 hours of receipt.

IV. Warehouse Siting and Design Considerations

The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local communities. The suggested best practices for siting and design of warehouse facilities does not relieve lead agencies' responsibility under CEQA to conduct a project-specific analysis of the project's impacts and evaluation of feasible mitigation measures and alternatives; lead agencies' incorporation of the best practices must be part of the impact, mitigation and alternatives analyses to meet the requirements of CEQA. Examples of best practices when siting and designing warehouse facilities include:

- Per California Air Resources Board (CARB) guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.[20]
- Providing adequate amounts of on-site parking to prevent trucks and other vehicles from parking or idling on public streets and to reduce demand for off-site truck yards.
- Establishing setbacks from the property line of the nearest sensitive receptor to warehouse dock doors, loading areas, and truck drive aisles, and locating warehouse dock doors, loading areas, and truck drive aisles on the opposite side of the building from the nearest sensitive receptors—e.g., placing dock doors on the north side of the facility if sensitive receptors are near the south side of the facility.
- Placing facility entry and exit points from the public street away from sensitive receptors—e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Ensuring heavy duty trucks abide by the on-site circulation plans by constructing physical barriers to block those trucks from using areas of the project site restricted to light duty vehicles or emergency vehicles only.
- Preventing truck queuing spillover onto surrounding streets by positioning entry gates after a minimum of 140 feet of space for queuing, and increasing the distance by 70 feet for every 20 loading docks beyond 50 docks.
- Locating facility entry and exit points on streets of higher commercial classification that are designed to accommodate heavy duty truck usage.
- Screening the warehouse site perimeter and onsite areas with significant truck traffic (e.g., dock doors and drive aisles) by creating physical, structural, and/or vegetative buffers that prevent or substantially reduce pollutant and noise dispersion from the facility to sensitive receptors.
- Planting exclusively 36-inch box evergreen trees to ensure faster maturity and four-season foliage.
- Requiring all property owners and successors in interest to maintain onsite trees and vegetation for the duration of ownership, including replacing any dead or unhealthy trees and vegetation.
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Including signs and drive aisle pavement markings that clearly identify onsite circulation patterns to minimize unnecessary onsite vehicle travel.
- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

[20] CARB, Air Quality and Land Use Handbook: A Community Health Perspective (April 2005), at ES-1. CARB staff has released draft updates to this siting and design guidance which suggests a greater distance may be warranted in some scenarios. CARB, Concept Paper for the Freight Handbook (December 2019), *available at* https://ww2.arb.ca.gov/sites/default/files/2020-03/2019.12.12%20-%20Concept%20Paper%20for%20the%20Freight%20Handbook_1.pdf (last accessed September 18, 2022).

V. Air Quality and Greenhouse Gas Emissions Analysis and Mitigation

Emissions of air pollutants and greenhouse gases are often among the most substantial environmental impacts from new warehouse facilities. CEQA compliance demands a proper accounting of the full air quality and greenhouse gas impacts of logistics facilities and adoption of all feasible mitigation of significant impacts. Although efforts by CARB and other authorities to regulate the heavy-duty truck and off-road diesel fleets have made excellent progress in reducing the air quality impacts of logistics facilities, the opportunity remains for local jurisdictions to further mitigate these impacts at the project level. Lead agencies and developers should also consider designing projects with their long-term viability in mind. Constructing the necessary infrastructure to prepare for the zero-emission future of goods movement not only reduces a facility's emissions and local impact now, but it can also save money as demand for zero-emission infrastructure grows. In planning new logistics facilities, the Bureau strongly encourages developers to consider the local, statewide, and global impacts of their projects' emissions.

Examples of best practices when studying air quality and greenhouse gas impacts include:

- Fully analyzing all reasonably foreseeable project impacts, including cumulative impacts. In general, new warehouse developments are not ministerial under CEQA because they involve public officials' personal judgment as to the wisdom or manner of carrying out the project, even when warehouses are permitted by a site's applicable zoning and/or general plan land use designation.[21]
- When analyzing cumulative impacts, thoroughly considering the project's incremental impact in combination with past, present, and reasonably foreseeable future projects, even if the project's individual impacts alone do not exceed the applicable significance thresholds.
- Preparing a quantitative air quality study in accordance with local air district guidelines.
- Preparing a quantitative health risk assessment in accordance with California Office of Environmental Health Hazard Assessment and local air district guidelines.
- Refraining from labeling compliance with CARB or air district regulations as a mitigation measure—compliance with applicable regulations is required regardless of CEQA.
- Disclosing air pollution from the entire expected length of truck trips. CEQA requires full public disclosure of a project's anticipated truck trips, which entails calculating truck trip length based on likely truck trip destinations, rather than the distance from the facility to the edge of the air basin, local jurisdiction, or other truncated endpoint. All air pollution associated with the project must be considered, regardless of where those impacts occur.

[21] CEQA Guidelines § 15369.

- Accounting for all reasonably foreseeable greenhouse gas emissions from the project, without discounting projected emissions based on participation in California's Cap-and-Trade Program.

Examples of measures to mitigate air quality and greenhouse gas impacts from construction are below. To ensure mitigation measures are enforceable and effective, they should be imposed as permit conditions on the project where applicable.

- Requiring off-road construction equipment to be hybrid electric-diesel or zero-emission, where available, and all diesel-fueled off-road construction equipment to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.
- Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.
- Limiting the amount of daily grading disturbance area.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than three minutes.
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.

Examples of measures to mitigate air quality and greenhouse gas impacts from operation include:

- Requiring all heavy-duty vehicles engaged in drayage[22] to or from the project site to be zero-emission beginning in 2030.

[22] "Drayage" refers generally to transport of cargo to or from a seaport or intermodal railyard.

- Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.
- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.
- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks.
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.
- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance)
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of

trucks.

- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Designing to LEED green building certification standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

VI. Noise Impacts Analysis and Mitigation

The noise associated with logistics facilities can be among their most intrusive impacts to nearby sensitive receptors. Various sources, such as unloading activity, diesel truck movement, and rooftop air conditioning units, can contribute substantial noise pollution. These impacts are exacerbated by logistics facilities' typical 24-hour, seven-days-per-week operation. Construction noise is often even greater than operational noise, so if a project site is near sensitive receptors, developers and lead agencies should adopt measures to reduce the noise generated by both construction and operation activities.

Examples of best practices when studying noise impacts include:

- Preparing a noise impact analysis that considers all reasonably foreseeable project noise impacts, including to nearby sensitive receptors. All reasonably foreseeable project noise impacts encompasses noise from both construction and operations, including stationary, on-site, and off-site noise sources.
- Adopting a lower significance threshold for incremental noise increases when baseline noise already exceeds total noise significance thresholds, to account for the cumulative impact of additional noise and the fact that, as noise moves up the decibel scale, each decibel increase is a progressively greater increase in sound

pressure than the last. For example, 70 dBA is ten times more sound pressure than 60 dBA.

- Disclosing and considering the significance of short-term noise levels associated with all aspects of project operation (i.e. both on-site noise generation and off-site truck noise). Considering only average noise levels may mask noise impacts sensitive receptors would consider significant—for example, the repeated but short-lived passing of individual trucks or loading activities at night.

Examples of measures to mitigate noise impacts include:

- Constructing physical, structural, or vegetative noise barriers on and/or off the project site.
- Planning and enforcing truck routes that avoid passing sensitive receptors.
- Locating or parking all stationary construction equipment as far from sensitive receptors as possible, and directing emitted noise away from sensitive receptors.
- Verifying that construction equipment has properly operating and maintained mufflers.
- Requiring all combustion-powered construction equipment to be surrounded by a noise protection barrier
- Limiting operation hours to daytime hours on weekdays.
- Paving roads where truck traffic is anticipated with low noise asphalt.
- Orienting any public address systems onsite away from sensitive receptors and setting system volume at a level not readily audible past the property line.

VII. Traffic Impacts Analysis and Mitigation

Warehouse facilities inevitably bring truck and passenger car traffic. Truck traffic can present substantial safety issues. Collisions with heavy-duty trucks are especially dangerous for passenger cars, motorcycles, bicycles, and pedestrians. These concerns can be even greater if truck traffic passes through residential areas, school zones, or other places where pedestrians are common and extra caution is warranted.

Examples of measures to mitigate traffic impacts include:

- Designing, clearly marking, and enforcing truck routes that keep trucks out of residential neighborhoods and away from other sensitive receptors.
- Installing signs in residential areas noting that truck and employee parking is prohibited.
- Requiring preparation and approval of a truck routing plan describing the facility's hours of operation, types of items to be stored, and truck routing to and from the facility to designated truck routes that avoids passing sensitive receptors. The plan should include measures for preventing truck queuing, circling, stopping, and parking on public streets, such as signage, pavement markings, and queuing analysis and enforcement. The plan should hold facility operators responsible for violations of the truck routing plan, and a revised plan should be required from any new tenant that occupies the property before a business license

is issued. The approving agency should retain discretion to determine if changes to the plan are necessary, including any additional measures to alleviate truck routing and parking issues that may arise during the life of the facility.
- Constructing new or improved transit stops, sidewalks, bicycle lanes, and crosswalks, with special attention to ensuring safe routes to schools.
- Consulting with the local public transit agency and securing increased public transit service to the project area.
- Designating areas for employee pickup and drop-off.
- Implementing traffic control and safety measures, such as speed bumps, speed limits, or new traffic signs or signals.
- Placing facility entry and exit points on major streets that do not have adjacent sensitive receptors.
- Restricting the turns trucks can make entering and exiting the facility to route trucks away from sensitive receptors.
- Constructing roadway improvements to improve traffic flow.
- Preparing a construction traffic control plan prior to grading, detailing the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations, and designing the plan to minimize impacts to roads frequented by passenger cars, pedestrians, bicyclists, and other non-truck traffic.

VIII. Other Significant Environmental Impacts Analysis and Mitigation

Warehouse projects may result in significant environmental impacts to other resources, such as to aesthetics, cultural resources, energy, geology, or hazardous materials. All significant adverse environmental impacts must be evaluated, disclosed and mitigated to the extent feasible under CEQA. Examples of best practices and mitigation measures to reduce environmental impacts that do not fall under any of the above categories include:

- Appointing a compliance officer who is responsible for implementing all mitigation measures, and providing contact information for the compliance officer to the lead agency, to be updated annually.
- Creating a fund to mitigate impacts on affected residents, schools, places of worship, and other community institutions by retrofitting their property. For example, retaining a contractor to retrofit/install HVAC and/or air filtration systems, doors, dual-paned windows, and sound- and vibration-deadening insulation and curtains.
- Sweeping surrounding streets on a daily basis during construction to remove any construction-related debris and dirt.
- Directing all lighting at the facility into the interior of the site.
- Using full cut-off light shields and/or anti-glare lighting.
- Requiring submission of a property maintenance program for agency review and approval providing for the regular maintenance of all building structures, landscaping, and paved surfaces.
- Using cool pavement to reduce heat island effects.

- Planting trees in parking areas to provide at least 35% shade cover of parking areas within fifteen years to reduce heat island impacts.
- Using light colored roofing materials with a solar reflective index of 78 or greater.
- Including on-site amenities, such as a truck operator lounge with restrooms, vending machines, and air conditioning, to reduce the need for truck operators to idle or travel offsite.
- Designing skylights to provide natural light to interior worker areas.
- Installing climate control and air filtration in the warehouse facility to promote worker well-being.

IX. Conclusion

California's world-class economy, ports, and transportation network position it at the center of the e-commerce and logistics industry boom. At the same time, California is a global leader in environmental protection and environmentally just development. The guidance in this document furthers these dual strengths, ensuring that all can access the benefits of economic development. The Bureau will continue to monitor proposed projects for compliance with CEQA and other laws. Lead agencies, developers, community advocates, and other interested parties should feel free to reach out to us as they consider how to guide warehouse development in their area.

Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.