DRAFT

Initial Study/Mitigated Negative Declaration
12021 Woodruff Avenue Industrial Building Project
(PLN-19-00132)

Prepared for:

City of Downey
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Downey, California 90241
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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
ACM	asbestos-containing materials
AERMOD	American Meteorological Society/EPA Regulatory Model
AFY	acre-feet per year
AIN	Assessor's Identification Number
APA	Allowed Pumping Allocation
AQMP	air quality management plan
AST	aboveground storage tank
BenMAP	Benefits Mapping and Analysis Program
BenMAP-CE	Benefits Mapping and Analysis Program—Community Edition
BMP	best management practices
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards
Cal/OSHA	California Occupation Health and Safety Administration
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CASGEM	California Statewide Groundwater Elevation Monitoring
CEQA	California Environmental Quality Act
CH_4	methane
City	City of Downey
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
County	County of Los Angeles
CRHR	California Register of Historical Resources
dB	decibel
dBA	A-weighted decibel
DFD	Downey Fire Department
DPD	Downey Police Department
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
DWR	Department of Water Resources
EAC	Existing plus Ambient Growth plus Cumulative Project
EIR	environmental impact report
EMFAC	Mobile Source Emissions Inventory Model
EO	Executive Order
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FHSZ	fire hazard severity zone
GHG	greenhouse gas
GWP	global warming potential

Acronym/Abbreviation	Definition
HARP2	Hot Spots Analysis and Reporting Program
HHDT	heavy heavy-duty truck
HIA	health impact assessment
HIC	Chronic Hazard Index
HRA	Health Risk Assessment
HREC	historical recognized environmental condition
HVAC	heating, ventilation, and air conditioning
I-	Interstate
IS	Initial Study
ITE	Institute of Transportation Engineers
JWPCP	Joint Water Pollution Control Plant
kBTU	thousand British thermal units
KMC	Kirkhill Manufacturing Company
kWh	kilowatt-hour
LDA	light-duty automobile
LDT	light-duty truck
L_{eq}	measured energy-averaged noise level
LHDT	light heavy-duty truck
LID	low-impact development
L_{max}	maximum noise level
LOS	level of service
LST	localized significance threshold
mgd	million gallons per day
MICR	maximum individual cancer risk
MM	mitigation measure
MND	Mitigated Negative Declaration
MT	metric ton
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NFA	No Further Action
NO	nitric oxide
NO_2	nitrogen dioxide
NO_x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O_3	ozone
OEHHA	Office of Environmental Health Hazard Assessment
PCE	passenger car equivalent
PGM	photochemical grid model
$PM_{2.5}$	particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to 10 microns
project	12021 Woodruff Avenue Industrial Building Project
RCNM	Roadway Construction Noise Model
RTP	Regional Transportation Plan
SB	Senate Bill
SCAB	South Coast Air Basin

Acronym/Abbreviation	Definition
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SJVAPCD	San Joaquin Valley Air Pollution Control District
SO_2	sulfur dioxide
SO_x	sulfur oxides
SoCalGas	Southern California Gas Company
SR	State Route
ST	short-term noise measurement location
TAC	toxic air contaminant
TCR	tribal cultural resource
UST	underground storage tank
VMT	vehicle miles traveled
VOC	volatile organic compound
WRP	water reclamation plant

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1 Introduction

1.1 Project Overview

The City of Downey (City) received a Planning Division Application PLN-19--00132 from 12021 Woodruff, LLC (applicant) requesting the approval of the following discretionary actions for the proposed 12021 Woodruff Avenue Industrial Building Project (project):

- Zone Change to change the zoning designation of the portions of the site currently zoned P-B Parking Buffer to M-2 General Manufacturing.
- Conditional Use Permit to permit the proposed "truck terminal" use in the M-2 General Manufacturing Zone.
- Site Plan Review to consider the project's architecture and on-site improvements.

The 6.31-acre site currently consists of an industrial building located directly west of Woodruff Avenue. The project would include the demolition of the existing, 74,662-square-foot industrial building and construction of an approximately 44,162-square-foot industrial tilt-up building for truck terminal use. The project would be used to mobilize both imported and exported goods that pass through the Ports of Los Angeles and Long Beach. The project would include 56 parking spaces for passenger vehicles, 76 spaces for cargo containers, and 70 loading docks.

The project is subject to analysis pursuant to the California Environmental Quality Act (CEQA). In accordance with CEQA Guidelines Section 15367, the City is the lead agency with principal responsibility for considering the project for approval (14 CCR 15000 et seq.).

1.2 California Environmental Quality Act Compliance

CEQA, a statewide environmental law contained in California Public Resources Code, Sections 21000–21177, applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment. The overarching goal of CEQA is to analyze the environmental impacts of development projects with an aim of protecting the environment. To achieve that goal, CEQA requires that public agencies identify the environmental consequences of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse impacts when avoidance or reduction is feasible. It also gives other public agencies and the public an opportunity to comment on the project. If significant adverse impacts cannot be avoided, reduced, or mitigated to below a level of significance, the public agency is required to prepare an environmental impact report (EIR) and balance the project's environmental concerns with other goals and benefits in a statement of overriding considerations.

In accordance with the CEQA Guidelines, the City, as the lead agency, has prepared an initial study (IS) to evaluate potential environmental effects and to determine whether an EIR, a negative declaration, or a mitigated negative declaration (MND) should be prepared for the project. CEQA Guidelines Section 15070(b) provides that an MND should be prepared for a project when the IS has identified potentially significant environmental impacts associated with the project, but (1) revisions to the project's plans or proposals made or agreed to by the applicant before release of an MND for public review would avoid or mitigate environmental effects to a point where no significant effect on the environment would occur, and (2) there is no substantial evidence in the record before the public agency that the project, as revised, may have a significant effect on the environment. The IS determined that implementation of the

project would result in no impacts or less-than-significant impacts with incorporation of mitigation. Therefore, the City has prepared an MND for the project.

1.3 Public Review Process

As specified by the CEQA Guidelines, the project's Notice of Intent was circulated for a 30-day public review period (14 CCR 15082[b]) to a variety of public agencies, including agencies with jurisdiction over resources affected by the project. The Notice of Intent has been provided to the State Clearinghouse, Clerk of the County of Los Angeles, responsible agencies, and interested organizations and individuals.

Reviewers of the IS/MND are given a 30-day public review period, beginning on December 15, 2020 and ending on January 14, 2021, to prepare written comments on the IS/MND. During the public review period, the IS/MND, including the technical appendices, is available online for review at the City's website:

https://www.downeyca.org/our-city/departments/community-development/planning/environmental-documents

A hard copy of the IS/MND is available for review at Downey City Hall by appointment on Monday through Thursday from 7:30 a.m. to 5:30 p.m. (except during office closures):

City of Downey
Community Development Department, Planning Division
11111 Brookshire Avenue
Downey, California 90241

To schedule an appointment to review the IS/MND at Downey City Hall, please contact Alfonso Hernandez at 562.904.7154 or ashernandez@downeyca.org.

In reviewing the IS/MND, affected public agencies and interested members of the public should focus on the adequacy of the document in identifying and analyzing the potential environmental impacts. Comments on the IS/MND and the analysis contained herein may be sent to the following recipient and address:

Alfonso S. Hernandez
City of Downey
Community Development Department
11111 Brookshire Avenue
Downey, California 90241
ashernandez@downeyca.org

2 Project Description

2.1 Project Location

The project site is located in the southern portion of the City, which is located in the County of Los Angeles (County). Regionally, the City is bordered by the cities of Pico Rivera, Santa Fe Springs, Norwalk, Bellflower, Paramount, South Gate, and Commerce (Figure 1, Project Location). Locally, the project site is immediately bounded by Woodruff Avenue to the east, and existing industrial/manufacturing uses to the north, west, and south (Figure 2, Vicinity Map).

The project site consists of a single parcel (Assessor's Identification Number [AIN] 6284-025-018). The addresses associated with the project site are 12021–12023 Woodruff Avenue, Downey, California 90241 (Figure 3, Project Aerial).

2.2 Environmental Setting

City of Downey

The City is approximately 12.8 square miles in area and is located in the southeastern part of the County. The City is surrounded by the cities of Pico Rivera to the north, Santa Fe Springs to the northeast, Norwalk to the east, Bellflower and Paramount to the south, South Gate to the southwest and west, and Commerce to the northwest. The City of Downey is located approximately 14 miles and 12 miles northeast of the Ports of Los Angeles and Long Beach, respectively. There are four freeways that provide direct access to Downey: Interstate (I-) 605 (San Gabriel River Freeway), which crosses the eastern portion of the City; I-5 (Santa Ana Freeway), which crosses the northern portion of the City; the I-105 intersection, which crosses the southern part of the City; and I-710 (Long Beach Freeway), which, although it does not cross the City, is located west of the City and accessible via three major streets: Florence Avenue, Firestone Boulevard, and Imperial Highway (City of Downey 2005).

The City is bound by the Rio Hondo River channel to the west, Telegraph Road to the north, the San Gabriel River channel to the east, and Gardendale Street and Foster Road to the south. Most of the City was developed during the housing boom in the 1950s and 1960s. The City is a fully developed community with older buildings and very few vacant properties. Since residential uses occupy more than half of the City's land area, Downey is known mainly as a bedroom community. However, the City also provides a mix of other land uses such as open space, commercial, and manufacturing. Residential uses are located throughout the City; however, they are predominantly located to the north, east, and west. Commercial uses are scattered throughout the north, east, south, and west. Manufacturing uses are primarily concentrated in the southeastern portion of the City.

Existing Project Site Conditions and Environmental Baseline

The 6.31-acre site currently contains an existing industrial building and related improvements associated with the Kirkhill Manufacturing Company, Inc. (KMC), a manufacturer of rubber products. The existing KMC building was initially constructed in 1951 and consisted of one large single-story structure. Over the years, additional structures were added in piecemeal fashion. The existing on-site structures are a mix of older and relatively newer buildings (Figure 4, Existing Site Photographs). The project site currently has two gated entrances along Woodruff Avenue that lead to private internal roads, which connect together around the building. These internal roads provide parking for employees and storage for heavy operation equipment.

KMC has operated at varying capacities since its operations began in 1951. These fluctuations in capacity are largely due to permitted expansions in useable building area that primarily occurred during the 1970s (Appendix A). Over the past few years, baseline operational conditions included approximately 200 full-time employees working on site, with the site receiving approximately 20 truck trips per day. Work shifts have been maintained over the past years from 5:00 a.m. to 10:00 p.m., Monday through Friday, with occasional Saturday shifts. KMC has recently decided to relocate their operations and plans on scaling down their on-site operations until the full transition is complete.

The majority of the project site is zoned M-2 (Manufacturing); however, a portion of the project site to the west is zoned as P-B (Parking Buffer) (Figure 5, Existing Zoning). The project site has a General Plan Land Use Designation of GM (General Manufacturing) (Figure 6, General Plan Land Use Designation) (City of Downey 2012a, 2012b).

Surrounding Land Uses

The project site is located in a predominantly industrial part of the City, although some commercial and residential uses are located in the general project vicinity. Table 1, Surrounding Land Uses, and Figure 7, Surrounding Land Uses and General Plan Land Use Designations, depict the land uses surrounding the project site.

Table 1. Surrounding Land Uses

Direction	General Plan Land Use Designation	Existing Use(s)
North	GM (General Manufacturing)	Industrial uses
East	GM (General Manufacturing)	Industrial uses
	NC (Neighborhood Commercial)	Restaurant
South	GM (General Manufacturing)	Adult Development Center/Trade School and Event Center/Banquet Hall
	NC (Neighborhood Commercial)	Church use, medical uses, and office uses
Southeast	NC (Neighborhood Commercial)	Church use
	GM (General Manufacturing)	Industrial uses
West	GM (General Manufacturing); followed by MDR (Medium Density Residential)	Industrial uses, followed by multi-family residential uses
Southwest	LDR (Low Density Residential)	Single-family residential uses

Source: City of Downey 2012a.
Note: See Figure 7, Surrounding Land Uses and General Plan Designations.

2.3 Project Characteristics

Proposed Project

The project includes the demolition of an existing, 74,662-square-foot industrial building and construction of an approximately 44,162-square-foot tilt-up industrial building for truck terminal use. The proposed industrial building would include approximately 36,142 square feet of warehouse space and 8,020 square feet of office space (Figure 8, Site Plan).

The new industrial building is intended to be used as a trucking terminal for distribution and logistics purposes. On-site activities will include storage of and/or consolidation of manufactured goods before the distribution to

retail locations or other warehouses. Other than truck parking and storage, all activities will occur within the industrial building. The office space is intended to be used for office uses ancillary to the warehouse operation.

Zone Change

The project site currently maintains two zoning classifications: General Manufacturing (M-2) and Parking Buffer (P-B). Incidentally, the Downey Zoning Code (Article IX, Land Use, of the Downey Municipal Code [2020]) no longer references the P-B zone. All mention of it was removed from the Zoning Code in 2008 when the code was updated. The Downey City Council removed the P-B zone because it was considered redundant since the development standards of the City's residential and non-residential zones provide the same safeguards as the former P-B zone. The only trace of the P-B zone is the City's Zoning Map and properties on the map that still maintain that classification.

The Zone Change application is a request to rezone the P-B portion of the project site to M-2 so that the entire property maintains the M-2 zoning classification (Figure 9, Proposed Zoning). The M-2 zone is the classification that corresponds with General Manufacturing General Plan category.

Architecture

The proposed industrial building would reach a maximum height of 36 feet above grade. The building would include concrete tilt-up panels on all sides of the building. The east side of the building would be the entrance of the office component and would include glazed windows and metal siding panels. All exterior and interior glazing would be tempered with insulated vision glass and spandrel glass around. The building would be painted with a color palette approved by the City, architect, and building owner (Figures 10A and 10B, Architectural Elevations).

The east side of the proposed building would include concrete stairs with an attached ramp. The ramp would consist of a 3.5-foot-high concrete tilt-up guard wall on both sides of the ramp. The building would include additional concrete staircases with guardrails and cable rails along the north and south sides.

Site Access, Circulation, and Parking

Site access would be provided via two 40-foot-wide driveways located along Woodruff Avenue:

- Driveway 1 (North) via Woodruff Avenue: Full access for passenger cars and inbound only (right-in/left-in) for trucks (no truck exit)
- Driveway 2 (South) via Woodruff Avenue: Full access for passenger cars and outbound only (right-out/left-out) for trucks (no truck entry)

Both driveways would lead to passenger vehicle parking lots on the northeast and southeast corners of the project site. The parking lots would be connected by a north–south through-lane, which provides additional passenger vehicle parking spaces along the eastern boundary of the site. On the west side of both parking lots would be a gated driveway leading to truck courts, trailer parking stalls, and loading docks. The project would include 56 parking spaces for passenger vehicles (52 standard, 2 accessible parking, and 2 van-accessible parking), 76 spaces for cargo containers and/or trailers, and 70 loading docks (refer to Figure 8, Site Plan).

Frontage Improvements

The project would include a new concrete walkway to provide pedestrian access from Woodruff Avenue to the office component of the project. The area of the walkway traversing the parking lot would consist of decorative pavers.

Consistent with a plant palette approved by the City, a variety of trees, shrubs, and vegetated groundcovers would be planted throughout all required setbacks, including the eastern portion of the project site fronting Woodruff Avenue. The total landscape area would be 27,511 square feet. The project would include an irrigation system that would comply with applicable local water efficiency standards (Figure 11, Landscape Plan).

Stormwater and Other Utility Improvements

Since the project site is currently developed with an industrial land use, the site is served by existing domestic water, sanitary sewer, stormwater, electrical, and natural gas utilities (Figure 12, Existing Utilities Locations). The project would connect to these utilities from their current locations within the project vicinity.

Stormwater Drainage

Currently, the project site is developed and is composed entirely of impervious surfaces. Stormwater is presently collected from the existing building's roof drains, conveyed towards the southwest portion of the project site, and discharged off-site via a parkway culvert into an existing storm drain within Washburn Road. Runoff from the vehicle parking lot and the landscaped area fronting Woodruff Avenue sheet flows toward the street, where it then drains via a parkway culvert located at the southeast portion of the site into an existing 36-inch public storm drain within Woodruff Avenue.

As part of the project, the project site would be graded so that stormwater collected via the building's roof and parking areas would be collected by concrete catchbasins and conveyed via underground pipes to an underground stormwater detention chamber and proprietary biofiltration system (Figure 13, Proposed Storm Drain System). The biofiltration system would use plants and soil media to treat stormwater before ultimately being discharged into the adjacent existing 36-inch public storm drain system within Washburn Road via an underdrain system and sump pump.

Domestic Water and Sanity Sewer

The City's Water Department would provide domestic water to the project site. The project would connect to an existing 12-inch-diameter water line in Woodruff Avenue for domestic and irrigation purposes. The City is located within the jurisdictional boundaries of the Sanitation Districts of Los Angeles County, District No. 2. Wastewater generated by the City is treated at the Joint Water Pollution Control Plant (JWPCP) located in the City of Carson and the Los Coyotes Water Reclamation Plant (WRP) in the City of Cerritos. The project site would connect to an existing 21-inch-diameter sewer line in Woodruff Avenue for sewage conveyance purposes (Figure 14, Proposed Wet Utilities).

Natural Gas and Electric Service

Southern California Gas Company would provide natural gas service to the project site. The project would connect to an existing 4-inch-diameter underground gas line within Woodruff Avenue.

Southern California Edison would provide electric service. The project would connect to existing overhead electrical lines on the west side of project site by undergrounded electric lines.

Construction and Scheduling

The project applicant intends to commence construction on or around March 2021. It is anticipated that construction would take approximately 10 months. Table 2 provides a tentative project construction schedule, as used in the air quality, greenhouse gas (GHG) emissions, and health risk assessment impact analysis (refer to Section 3.3, Air Quality, and Section 3.8, Greenhouse Gas Emissions, of this IS/MND; also see Appendix B, Air Quality, Greenhouse Gas Emission, and Energy Modeling Inputs and Outputs).

Table 2. Anticipated Project Construction Schedule

Construction Phase	Duration	Phase Start Date	Phase End Date
Demolition	2 months	March 2021	April 2021
Site Preparation	1 month	May 2021	May 2021
Grading	1 month	June 2021	June 2021
Building Construction	6 months	July 2021	December 2021
Paving	1 month	January 2022	January 2022
Architectural Coating	1 month	January 2022	January 2022

Operation

Upon completion of construction, the project would operate as a truck terminal for distribution and logistics purposes. On-site activities will include storage of and/or consolidation of manufactured goods before the distribution to retail locations or other warehouses. Other than truck parking and storage, all activities will occur within the industrial building. The office space is intended to be used for office uses ancillary to the warehouse operation.

The project will employ approximately 50 to 100 non-construction employees. The proposed project would operate 24 hours a day, 7 days a week.

2.4 Project Approvals

The actions and/or approvals that the City needs to consider for the project include, but are not limited to, the following. This list is preliminary, and may not be comprehensive:

- **Zone Change** to change the zoning designation of the westernmost portion of the project site from the P-B zone to G-2 zone.
- **Conditional Use Permit** to permit the proposed truck terminal use in the M-2 General Manufacturing Zone.
- **Site Plan Review** to review the project's architecture and on-site improvements.

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3 Initial Study Checklist

1. **Project title:**

   12021 Woodruff Avenue Industrial Building Project (PLN-19—00132)

2. **Lead agency name and address:**

   City of Downey
   Community Development Department
   11111 Brookshire Avenue
   Downey, California 90241

3. **Contact person and phone number:**

   Alfonso S. Hernandez, Senior Planner
   ashernandez@downeyca.org
   562.904.7154

4. **Project location:**

   12021–12023 Woodruff Avenue
   Downey, California 90241

5. **Project sponsor's name and address:**

   12021 Woodruff, LLC
   2141 Rosecrans Avenue, Suite 1151
   El Segundo, California 90245

6. **General plan designation:**

   GM (General Manufacturing)

7. **Zoning:**

   Existing:

   M-2 (Manufacturing) and P-B (Parking Buffer)

   Proposed:

   M-2 (Manufacturing)

8. **Description of project:**

The project includes the demolition of an existing, 74,662-square-foot industrial building and construction of an approximately 44,162-square-foot tilt-up industrial building for truck terminal use. The proposed industrial building would include approximately 36,142 square feet of warehouse space and 8,020 square feet of office space.

9. **Surrounding land uses and setting:**

The project site is located in a predominantly industrial part of the City, although some commercial and residential uses are located in the general project vicinity. The project site is presently occupied by KMC, a manufacturer of rubber products.

10. **Other public agencies whose approval is required:**

No other public agency approval is required.

11. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

Yes, please refer to Section 3.18, Tribal Cultural Resources, for additional detail.

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

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

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 DECLARATION 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 impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document 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 ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Alfonso S. Hernandez, Senior Planner

12-10-2020
Date

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 off-site 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 Environmental Impact Report (EIR) is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than 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 Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses 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. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
    a. Earlier Analysis Used. Identify and state where they are available for review.
    b. 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.
    c. 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 explanation of each issue should identify:
    a. The significance criteria or threshold, if any, used to evaluate each question; and
    b. The mitigation measure identified, if any, to reduce the impact to less than significance.

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resources Code Section 21099, would the project:				
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 non-urbanized 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) Would the project have a substantial adverse effect on a scenic vista?

No Impact. The Downey Vision 2025 General Plan (City of Downey 2005) does not identify any scenic vistas in the City, and the project site is located in an urban setting within the primarily industrial Woodruff Avenue corridor. The project would involve the demolition of an existing industrial building and construction of a new industrial tilt-up building that would be consistent with the surrounding industrial land uses. Additionally, the presence of single and multi-story industrial developments adjacent to the project site and along Woodruff Avenue limits opportunities for long-distance sightlines in the surrounding area which could be of scenic value. Therefore, no impacts associated with scenic vistas would occur.

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

No Impact. None of the highways and freeways passing through the City have been designated state scenic highways by the California Department of Transportation (Caltrans). Within Los Angeles County, State Route 27 (SR-27; also known as Topanga Canyon Highway) is an officially designated state scenic highway (SR-27 is approximately 27 miles north of the project site). Additionally, SR-2 (also known as the Angeles Crest Highway) from La Cañada Flintridge north to the San Bernardino County line is an officially designated state scenic highway (SR-2 is located approximately 20 miles north of the project site) (Caltrans 2016). South of SR-2 and through the Seal Beach area, SR-1 is an eligible state scenic highway; however, this segment of

the highway is more than 10 miles south of the project site. Due to the presence of intervening development and landscaping, views to the project site are not available from any of these designated or eligible state scenic highways. Therefore, no impacts associated with a state scenic highway would occur.

c) In non-urbanized areas, would the project 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. Section 15387 of the CEQA Guidelines states that an urbanized area means a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile. In July 2019, the population in the City was estimated to be 111,126 (U.S. Census 2019). Therefore, the project is located within an urbanized area, and the second question of this threshold applies to the project. The majority of the project site is zoned M-2 (Manufacturing); however, portions of the project site to the south, east, and west are zoned as P-B (Parking Buffer) (refer to Figure 5, Existing Zoning). Implementation of the project would also involve a zone change to change the zoning designation of the portions of the site currently zoned P-B (Parking Buffer) to M-2 (Manufacturing) (refer to Figure 9, Proposed Zoning). Upon approval of the proposed zone change, the project site would be uniformly zoned M-2 (Manufacturing).

The City's Municipal Code includes design standards related to building height, setbacks, landscaping requirements, and other development considerations that are relevant to scenic quality. Specifically, Title 11, Zoning and Development, of the City's Municipal Code includes design standards for each zoning district, including the M-2 (Manufacturing) zone, which would be the zoning designation for the project site. The M-2 (Manufacturing) zone has specified regulations that are outlined in Section 9318.06 of the City's Municipal Code (City of Downey 2020a). The purpose of the design standards are, in part, to regulate the uses of buildings and structures and to encourage the most appropriate use of land. As a part of the City's development and design review process, project plans are reviewed by City staff, to ensure compliance with applicable provisions of the City's Municipal Code, including those provisions relating to scenic quality. Because the project would undergo review by City staff, and no project components that are inconsistent with provisions of the Municipal Code that relate to scenic quality are being requested, the project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, impacts associated with conflicting with applicable zoning governing scenic quality would be less than significant.

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

No Impact. Under existing conditions, the project site is developed with an existing industrial building with outdoor safety and security lighting. Similarly, the project would feature interior and exterior lighting for general illumination, security, and safety purposes. Interior spaces would be illuminated with a variety of lighting options, which would operate during regular business hours. Due to the existing industrial uses on site and in the surrounding area, implementation of the project and operation of nighttime lighting would not substantially increase lighting levels generated on site and projected onto adjacent properties. In addition, lighting for the project would be required to comply with applicable City regulations, including standards established for outdoor lighting. More specifically, the project would be required to comply with the City's Municipal Code, Section 9520.06, Outdoor Lighting, which requires the installation of low-level

parking-lot lighting designed to eliminate spillover to the street and adjacent areas (City of Downey 2020a). Furthermore, existing City standards require all outdoor lighting to be directed, positioned, and shielded so as to not direct lighting on any street or abutting property. City standards also state that the type, location, and intensity of lighting is subject to review and approval by the City Planner (City of Downey 2020a). Because the project's lighting would not result in new or more intense levels of light and/or glare beyond levels already occurring on the project site, and because all project lighting would conform to City lighting requirements, no impacts with light and glare would occur.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. 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 Department 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 forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
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) Would the project 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?

No Impact. The project site and surrounding areas are characterized by features typical of an urban landscape. As shown on the Los Angeles County Important Farmland map, the project site does not include any sites mapped by the Farmland Mapping and Monitoring Program as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2017a). Implementation of the project would not involve changes that could result in conversion of farmland to non-agricultural use, as no agricultural uses or farmland exist on the project site or in proximity to the project site. Furthermore, the project site is already graded and fully developed. Therefore, no impacts associated with the conversion of Farmland to non-agricultural uses would occur.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site is located within an industrial area of the City, zoned as M-2 (Manufacturing) and designated as General Manufacturing (GM), and is fully developed with an existing industrial use. As shown on the Los Angeles County Williamson Act Fiscal Year 2015/2016 map, no areas that are under a Williamson Act contract exist on the project site or in the vicinity of the project site (DOC 2017b). For these reasons, implementation of the project would not conflict with existing zoning for agricultural use, as no agriculturally zoned sites exist in the area, nor would it conflict with a Williamson Act contract, as none exist in the area. Therefore, no impact to Williamson Act contract lands or land zoned for agricultural uses would occur.

c) Would the project 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. According to the City's Zoning Map, the project site is not located on or adjacent to forestland, timberland, or timberland zoned timberland production (City of Downey 2012b). Therefore, no impacts associated with forestland, timberland, or timberland zoned timberland production would occur.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The project site is not located on or adjacent to forestland. No private timberlands or public lands with forests are located in the City. Therefore, no impacts associated with the conversion of forest land to non-forest uses would occur.

e) Would the project 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 not located on or adjacent to any parcels identified as Important Farmland or forestland. In addition, the project would not involve changes to the existing environment that would result in the indirect conversion of Important Farmland or forestland located away from the project site. Therefore, no impacts would occur.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
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?	☐	☐	☒	☐

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less-than-Significant Impact. The project site is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County, and is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD). The SCAQMD administers the SCAB's Air Quality Management Plan (AQMP), which is a comprehensive document outlining an air pollution control program for attaining the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recently adopted AQMP for the SCAB is the 2016 AQMP (SCAQMD 2017). The 2016 AQMP focuses on available, proven, and cost-effective alternatives to traditional air quality strategies while seeking to achieve multiple goals in partnership with other entities seeking to promote reductions in GHGs and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2017).

The purpose of a consistency finding with regard to the AQMP is to determine if a project is consistent with the assumptions and objectives of the regional air quality plans, and if it would interfere with the region's ability to comply with federal and state air quality standards. The SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3 of the SCAQMD CEQA Air Quality Handbook. These criteria are as follows (SCAQMD 1993):

> **Consistency Criterion No. 1:** Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.

Consistency Criterion No. 2: Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

To address the first criterion, project-generated criteria air pollutant emissions have been estimated and analyzed for significance and are addressed under Section 3.3(b). Detailed results of this analysis are included in Appendix B of this addendum. As presented in Section 3.3(b), construction and operation of the project would not generate criteria air pollutant emissions that exceed the SCAQMD's thresholds, and thus, the project would be consistent with Criterion No. 1.

The second criterion regarding the potential of the project to exceed the assumptions in the AQMP or increments based on the year of project buildout and phase is primarily assessed by determining consistency between the project's land use designations and its potential to generate population growth. In general, projects are considered consistent with, and not in conflict with or obstructing implementation of, the AQMP if the residential and/or employment population growth they produce is consistent with the underlying regional plans used to develop the AQMP (SCAQMD 1993). The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, and employment by industry) developed by the Southern California Association of Governments (SCAG) for its 2016–2040 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (SCAG 2016). SCAQMD uses this document, which is based in large part on general plans for cities and counties in the SCAB, to develop the AQMP emissions inventory (SCAQMD 2017).[1] The SCAG RTP/SCS, and associated Regional Growth Forecast, is generally consistent with the local plans; therefore, the 2016 AQMP is generally consistent with the City's General Plan.

As discussed in Section 2.2, Environmental Setting, the project site is designated in the City's General Plan as General Manufacturing (GM) (City of Downey 2012a), and the zoning for the majority of the project site is M-2 (Manufacturing); however, a portion of the project site to the west is zoned as P-B (Parking Buffer). Implementation of the project will require approval of a Zone Change requested by the project applicant to change the zoning designation of the westernmost portion of the project site from the P-B (Parking Buffer) zone to the G-2 (General Manufacturing) zone. As the proposed uses for the project site are consistent with the existing land use designation, no amendments to the General Plan would be required. Accordingly, the project is consistent with the SCAG RTP/SCS forecasts used in the SCAQMD AQMP development, and thus, the project would be consistent with Criterion No. 2.

In summary, based on the considerations presented for the two criteria, impacts relating to the project's potential to conflict with or obstruct implementation of the applicable AQMP would be less than significant.

[1] Information necessary to produce the emissions inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including the California Air Resources Board, Caltrans, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into its Travel Demand Model for estimating/projecting vehicle miles traveled and driving speeds. SCAG's socioeconomic and transportation activities projections in their *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy* are integrated in the 2016 AQMP (SCAQMD 2017).

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less-than-Significant Impact. Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used in the determination of whether a project's individual emissions would have a cumulatively considerable contribution on air quality. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003a).

A quantitative analysis was conducted to determine whether proposed construction activities would result in a cumulatively considerable net increase in emissions of criteria air pollutants for which the SCAB is designated as nonattainment under the NAAQS or CAAQS. Criteria air pollutants include ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}), particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$), and lead. Pollutants that are evaluated herein include volatile organic compounds (VOCs) and oxides of nitrogen (NO_x), which are important because they are precursors to O_3, as well as CO, sulfur oxides (SO_x), PM_{10}, and $PM_{2.5}$.

Regarding NAAQS and CAAQS attainment status,[2] the SCAB is designated as a nonattainment area for national and California O_3 and $PM_{2.5}$ standards (CARB 2019a; EPA 2019). The SCAB is designated as a nonattainment area for California PM_{10} standards; however, it is designated as an attainment area for national PM_{10} standards. The SCAB nonattainment status of O_3, $PM_{10,}$ and $PM_{2.5}$ standards is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB, including motor vehicles, off-road equipment, and commercial and industrial facilities. The SCAB is designated as an attainment area for national and California NO_2, CO, and SO_2 standards. Although the SCAB has been designated as partial nonattainment (Los Angeles County) for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard.[3]

The project would result in emissions of criteria air pollutants for which the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (EPA) have adopted ambient air quality standards (i.e., the NAAQS and CAAQS). Projects that emit these pollutants have the potential to cause, or contribute to, violations of these standards. The SCAQMD CEQA Air Quality Significance Thresholds, as revised in April 2019, set forth quantitative emission significance thresholds for criteria air pollutants, which, if exceeded, would indicate the potential for a project to contribute to violations of the NAAQS or CAAQS. Table 3 lists the SCAQMD Air Quality Significance Thresholds (SCAQMD 2019).

[2] An area is designated as in attainment when it is in compliance with the NAAQS and/or the CAAQS. The NAAQS and CAAQS are set by the U.S. Environmental Protection Agency and CARB, respectively, for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare. Attainment = meets the standards; attainment/maintenance = achieve the standards after a nonattainment designation; nonattainment = does not meet the standards.

[3] Re-designation of the lead NAAQS designation to attainment for the Los Angeles County portion of the SCAB is expected based on current monitoring data. The phase out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

Table 3. South Coast Air Quality Management District Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
Pollutant	*Construction (Pounds per Day)*	*Operation (Pounds per Day)*
VOCs	75	55
NO_x	100	55
CO	550	550
SO_x	150	150
PM_{10}	150	150
$PM_{2.5}$	55	55
Lead[a]	3	3
TACs and Odor Thresholds		
TACs[b]	Maximum incremental cancer risk ≥10 in 1 million Cancer Burden >0.5 excess cancer cases (in areas ≥1 in 1 million) Chronic and acute hazard index ≥1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	

Source: SCAQMD 2019.
Notes: VOC = volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; TAC = toxic air contaminant; SCAQMD = South Coast Air Quality Management District.
GHG emissions thresholds for industrial projects, as added in the March 2015 revision to the SCAQMD Air Quality Significance Thresholds, were not include included in this table as they are addressed within the GHG emissions analysis and not the air quality analysis.

[a] The phase out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

[b] TACs include carcinogens and noncarcinogens.

Short-Term Construction Impacts

Construction of the project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (e.g., off-road construction equipment, soil disturbance, VOC off-gassing from architectural coatings and asphalt pavement application) and off-site sources (e.g., vendor trucks, haul trucks, and worker vehicle trips). Specifically, entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM_{10} and $PM_{2.5}$ emissions. Internal combustion engines used by construction equipment, haul trucks, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of VOC, NO_x, CO, PM_{10}, and $PM_{2.5}$. Construction emissions can vary substantially from day to day depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions.

Application of architectural coatings, such as exterior paint and other finishes, and application of asphalt pavement would also produce VOC emissions. VOC off-gassing emissions result from evaporation of solvents contained in surface coatings such as in paints and primers used during construction of the facility. California Emissions Estimator Model (CalEEMod) calculates the VOC evaporative emissions from application of surface coatings based on the VOC emissions factor, the building square footage, and the assumed fraction of surface area. The emissions associated with architectural coatings are estimated based on CalEEMod defaults values for VOC content.

The project would be required to comply with SCAQMD Rule 403 to control dust emissions generated during any dust-generating activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active dust areas at least two times per day or more depending on weather conditions, which was assumed in CalEEMod.

Emissions from the construction phase of the project were estimated using CalEEMod (version 2016.3.2) default values. For the purpose of conservatively estimating project emissions, construction was modeled beginning in March 2021 and concluding in January 2022,[4] lasting approximately 11 months. As a result of demolition, 3,200 tons of debris were estimated to be exported from the site. The analysis contained herein is based on the following schedule assumptions (duration of phases is approximate):

- Demolition: 2 months (March 2021 – April 2021)
- Site Preparation: 1 month (May 2021)
- Grading: 1 month (June 2021)
- Building construction: 6 months (July 2021 – December 2021)
- Paving: 1 month (January 2022)
- Application of architectural coatings: 1 month (January 2022)

Construction modeling assumptions for equipment and vehicles are provided in Table 4. Equipment mix and horsepower were based on CalEEMod default values, including equipment load factor. The site will be balanced without need for import or export of earthwork materials. For the analysis, it was generally assumed that heavy-duty construction equipment would be operating at the site 5 days per week.

Table 4. Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Demolition	18	0	400	Concrete/industrial saws	1	8
				Excavators	3	8
				Other construction equipment	1	8
				Rubber-tired dozers	2	8
Site Preparation	18	0	0	Rubber-tired dozers	3	8
				Tractors/loaders/ backhoes	4	8
Grading	16	0	0	Excavators	1	8
				Graders	1	8
				Rubber-tired dozers	1	8
				Tractors/loaders/ backhoes	3	8

[4] The analysis assumes a construction start date of March 2021, which represents the earliest date construction would initiate. Assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant and GHG emissions, because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

Table 4. Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Building construction	34	14	0	Cranes	1	7
				Forklifts	3	8
				Generator sets	1	8
				Tractors/loaders/ backhoes	3	7
				Welders	1	8
Paving	16	0	0	Pavers	2	8
				Paving equipment	2	8
				Rollers	2	8
Architectural coating	8	0	0	Air compressors	1	6

Source: Appendix B.

Table 5 shows the estimated maximum daily construction emissions associated with the construction phase of the project.

Table 5. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds Per Day					
2021	3.97	40.55	26.39	0.60	10.38	6.40
2022	25.99	12.60	17.23	0.03	0.92	0.68
Maximum Daily Emissions	**25.99**	**40.55**	**26.39**	**0.60**	**10.38**	**6.40**
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Appendix B.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.
These estimates reflect control of fugitive dust required by SCAQMD Rule 403, specifically, watering of active site areas two times per day.

As shown in Table 5, daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$ during project construction, and short-term construction impacts would be less than significant.

Long-Term Operational Impacts

Operation of the project would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from mobile sources, including vehicle trips; area sources, including the use of consumer products, architectural coatings for repainting, and landscape maintenance equipment; and energy sources, including combustion of fuels

used for space and water heating, which are described further below. Unrefrigerated warehouse was selected as the representative land use in CalEEMod because the project would not include cold storage.

Baseline Operational Emissions

The existing manufacturing facility also generates criteria air pollutant emissions, which are primarily associated with vehicular traffic. Emissions generated during operation of the existing facility were estimated to provide a baseline for comparison to projected operational emissions generated by buildout of the project. An operational year of 2020 was used to represent existing conditions. For the purposes of estimating emissions from the existing operations at the site, Manufacturing was selected as the representative land in CalEEMod and CalEEMod default values were used for area and energy sources. As discussed under mobile sources, the baseline trip rates and truck fleet mix are based on the Transportation Impact Analysis (TIA) prepared for the project and included as Appendix C. The TIA used existing employee information and Institute of Transportation Engineering trip rates to develop trip generation data.

Area Sources

CalEEMod was used to estimate operational emissions from area sources, including emissions from consumer product use, architectural coatings, and landscape maintenance equipment. Emissions associated with natural gas usage in space heating and water heating are calculated in the building energy use module of CalEEMod, as described in the following text.

Consumer products are chemically formulated products used by household and institutional consumers, including detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products. Other paint products, furniture coatings, or architectural coatings are not considered consumer products (CAPCOA 2017). Consumer product VOC emissions are estimated in CalEEMod based on the floor area of nonresidential buildings and on the default factor of pounds of VOC per building square foot per day. The CalEEMod default values for consumer products were assumed.

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings such as in paints and primers used during building maintenance. CalEEMod calculates the VOC evaporative emissions from application of surface coatings based on the VOC emission factor, building square footage, assumed fraction of surface area, and reapplication rate. The VOC emission factor is based on the VOC content of the surface coatings, and SCAQMD's Rule 1113 (Architectural Coatings) governs the VOC content for interior and exterior coatings. The model default reapplication rate of 10% of area per year is assumed. Consistent with CalEEMod defaults for non-residential uses, it is assumed that the surface area for painting equals 2.0 times the floor square footage, with 75% assumed for interior coating and 25% assumed for exterior surface coating (CAPCOA 2017). The emissions associated with architectural coatings are estimated based on CalEEMod defaults values for VOC content.

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chainsaws, and hedge trimmers. The emissions associated from landscape equipment use are estimated based on CalEEMod default values for emission factors (grams per square foot of building space per day) and number of summer days (when landscape maintenance would generally be performed) and winter days.

Energy Sources

As represented in CalEEMod, energy sources include emissions associated with building electricity and natural gas usage (non-hearth). Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use are only quantified for GHGs in CalEEMod, since criteria pollutant emissions occur at the power plant, which is typically off site.

CalEEMod default values for energy consumption for the land use (unrefrigerated warehouse) were applied for the project analysis because the project would not include cold storage. The energy use from nonresidential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Energy use in buildings (both natural gas and electricity) is divided by the program into end-use categories subject to Title 24 requirements (end uses associated with the building envelope, such as the heating, ventilation, and air conditioning [HVAC] system; water heating system; and integrated lighting) and those not subject to Title 24 requirements (such as appliances, electronics, and miscellaneous "plug-in" uses).

Title 24 of the California Code of Regulations serves to enhance and regulate California's building standards. The current Title 24, Part 6 standards, referred to as the 2016 Title 24 Building Energy Efficiency Standards, became effective on January 1, 2017. The 2019 Title 24 Building Energy Efficiency Standards, which became effective on January 1, 2020, will further reduce energy use and associated emissions compared to current standards. Nevertheless, for a conservative estimate, the 2016 Title 24 standards are assumed within the CalEEMod (CAPCOA 2017) for this analysis.

Mobile Sources

The project would generate criteria pollutant emissions from mobile sources (vehicular traffic) as a result of the employee passenger vehicles (workers) and truck traffic associated with the operation of the warehouse. Emissions from the mobile sources during operation of the project were estimated using a spreadsheet-based model and emissions factors from the CARB Mobile Source Emissions Inventory Model (EMFAC, version 2017), and EPA AP-42 factors for paved road dust generation. Emission calculation equations and assumptions were primarily derived from CalEEMod. The key factors in the mobile source emission calculations include trip rates, trip lengths, fleet mix, and emissions factors for each vehicle, which are described further below.

The baseline and project trip rates and the truck fleet mix are based on the TIA prepared for the project and included as Appendix C. As detailed in the TIA, the project is anticipated to generate 238 average daily trips from passenger vehicles and 279 average daily trips from heavy-duty trucks. Of the 279 average daily truck trips, 11% (32 truck trips) were assumed to be two-axle trucks; 26% (72 truck trips) would be three-axle trucks; and 63% (176 truck trips) would be four+-axle trucks. Consistent with CalEEMod default values for Los Angeles County, the worker trip lengths were assumed to be of 16.6 miles per one-way trip. For the heavy-duty trucks, an average truck distance of 40 miles was assumed, consistent with general recommendations from the SCAQMD.

Vehicle emissions occur during startup, operation (running), idling, and from evaporative losses when the engines are resting. The emissions factors for trucks and passenger vehicles were determined using EMFAC2017. EMFAC2017 generates emissions factors, expressed in grams per mile, grams per trip, and grams per vehicle per day for the fleet in a class of motor vehicles within a county for a particular study

year. For this analysis, Los Angeles County and calendar year 2022 was selected in EMFAC. For each vehicle emissions factor, aggregated values for model year and speed were assumed.

Consistent with the TIA, vehicle emission factors were developed for passenger cars and heavy-duty trucks. A composite, or weighted-average, emissions factor was developed for project vehicle types if more than one vehicle category in EMFAC is anticipated to be representative of the project vehicle. For passenger vehicles, the composite emission factor represents the weighted average emission rate by vehicle miles traveled (VMT) for passenger vehicles (light-duty automobiles [LDA]), light-duty trucks (LDT1, 0–3,750 pounds), light-duty trucks (LDT2, 3,751–5,750 pounds), and a composite mix of gasoline and diesel-fueled and electric. For the trucks, the percent breakdown by axle was used to developed the composite emission factor assuming the following vehicle categories in EMFAC2017: two-axle trucks reflect a mix of light heavy-duty trucks (LHDT1, 8,501 to 10,000 pounds, and LHDT2, 10,001 to 14,000 pounds); three-axle trucks reflect medium heavy-duty trucks (MHDT); and four+-axle trucks reflect heavy heavy-duty trucks (HHDT).

Running Exhaust, Tire Wear, and Brake Wear (grams per mile). The vehicle exhaust, tire wear, and brake wear emission factors developed for trucks and passenger vehicles in grams per mile were then multiplied by the weighted average daily VMT to estimate emissions associated with vehicle travel to and from the site. As explained previously, it was assumed that each worker trip would be 16.6 miles and each truck trip would be 40 miles.

Starting Exhaust, Hot Soak, Running Loss Evaporative (grams per trip). The vehicle starting exhaust, hot soak,[5] and running loss evaporative[6] emissions factors developed for trucks and passenger vehicles were then multiplied by the average daily vehicle trips to estimate emissions associated with vehicle travel to and from the site. Truck trips and passenger vehicle trips per day were based on TIA (Appendix C).

Resting Loss Evaporation and Diurnal Loss Evaporation (grams per vehicle per day). The vehicle resting loss evaporative[7] and diurnal[8] loss emissions factors developed for trucks and passenger vehicles were then multiplied by the average daily and annual vehicles, conservatively assumed equal to the average daily trips to estimate emissions associated with vehicles on site idling and resting. Truck trips and passenger vehicle trips per day were based on TIA(Appendix C).

Idling (grams per vehicle per minute). Truck idling was estimated using EMFAC emission factors that were converted to per minute of idling per vehicle. The idling emissions were calculated by multiplying the per-minute emission factors by the estimated idle duration of 15 minutes per truck trip, representing up to three idling events of a maximum of 5 minutes of idling each instance.

Paved Road Dust (grams per mile). Vehicles that drive on paved roads generate fugitive dust by dispersing the silt from the roads. Paved road dust PM_{10} and $PM_{2.5}$ emission factors were developed pursuant to the

5 HC Emissions (HOTSOAK) that occur immediately after a trip are due to fuel heating as an engine remains hot for up to 35 minutes after being switched off.

6 HC Emissions (RUNLOSS) that occur are a result of hot fuel vapors escape from the fuel system or overwhelm the carbon canister while the vehicle is operating

7 Emissions that occur while the vehicle is sitting, caused by fuel permeation through rubber and plastic components. Emissions are counted as resting loss emissions if the vehicle has not been operated for 35 minutes and has been stationary, while the ambient temperature is either constant or decreasing.

8 Emissions that occur when rising ambient temperatures cause fuel evaporation from vehicles sitting throughout the day. These losses are from leaks in the fuel system, fuel hoses, connectors, as a result of the breakthrough of vapors from the carbon canister. If a vehicle is sitting for a period of time, emissions from the first 35 minutes are considered as hot soak, and emissions from the remaining period are considered as diurnal emissions, provided that the ambient temperature is increasing during the remaining period of time.

CalEEMod 2016.3.2 road dust equation and based on road surface silt loading factors from CalEEMod and particle size multipliers from AP-42 Section 13.2.1 Paved Roads (EPA 2011). Emissions were calculated by multiplying the paved road dust emission factors by the VMT.

Off-Road Equipment

While the exact operational off-road equipment is unknown at this time, it was assumed that four electric-operated forklifts and one yard hostler would operate for 8 hours per day at the project site.

Table 6 presents the maximum daily emissions associated with operation of the project in 2022 at buildout. The values shown are the maximum summer and winter daily emissions results from CalEEMod for area, energy, and off-road emissions sources, plus the estimated mobile source emissions using a spreadsheet model and EMFAC2017 and AP-42 emission factors. Complete details of the emissions calculations are provided in Appendix B.

Table 6. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Emission Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds Per Day					
Existing Emissions						
Area	1.12	<0.01	0.04	0.00	<0.01	<0.01
Energy	0.02	0.21	0.18	<001	0.02	0.02
Mobile	2.43	41.89	23.58	0.20	27.26	7.42
Existing Total	**3.57**	**42.1**	**23.8**	**0.2**	**27.28**	**7.44**
Proposed Project						
Area	1.18	<0.01	0.01	0.00	0.48	0.44
Energy	<0.01	0.03	0.03	<0.01	<0.01	<0.01
Mobile	3.15	75.49	28.99	0.33	47.27	12.46
Off-Road Equipment	0.38	3.82	4.02	0.01	0.20	0.18
Project Total	**4.72**	**79.35**	**33.05**	**0.35**	**47.96**	**13.09**
Net Total	**1.15**	**37.25**	**9.25**	**0.15**	**20.68**	**5.65**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Appendix B.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); $PM_{2.5}$ = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District.
The values shown are the maximum summer or winter daily emissions results from CalEEMod, output and operational year 2022. The total values may not add up exactly due to rounding.
Off-road equipment includes emissions from one diesel-fueled yard hostler. CalEEMod erroneously reports criteria air pollutant emissions associated with electric off-road equipment, including the electric forklifts; therefore, those erroneous criteria air pollutant emissions from electric forklifts are omitted.

As shown in Table 6, maximum daily operational emissions of VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ generated by the project would not exceed the SCAQMD's significance thresholds, and long-term operational impacts would be less than significant.

As previously discussed, the SCAB has been designated as a federal nonattainment area for O_3 and $PM_{2.5}$, and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The nonattainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB, including motor vehicles, off-road equipment, and commercial and industrial facilities. Construction and operational activities of the project would generate VOC and NO_x emissions (precursors to O_3) and emissions of PM_{10} and $PM_{2.5}$. However, as indicated in Tables 5 and 6, project-generated emissions would not exceed the SCAQMD emission-based significance thresholds for VOCs, NO_x, PM_{10}, or $PM_{2.5}$.

Cumulative localized impacts would potentially occur if a project were to occur concurrently with another off-site project. Schedules for potential future projects near the project area are currently unknown; therefore, potential impacts associated with two or more simultaneous projects would be considered speculative.[9] However, future projects would be subject to CEQA and would require air quality analysis, and include, where necessary, mitigation. Criteria air pollutant emissions associated with construction activity of future projects would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM_{10} and $PM_{2.5}$ emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all sites in the SCAQMD. In addition, cumulative VOC emissions would be subject to SCAQMD Rule 1113 (Architectural Coatings).

Based on the previous considerations, the project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and impacts would be less than significant.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

The project would not expose sensitive receptors to substantial pollutant concentrations, as evaluated below.

Sensitive Receptors

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include sites such as residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). The nearest sensitive receptors that are residential uses located approximately 200 feet southwest of the project site.

Localized Significance Thresholds

The SCAQMD recommends a localized significance threshold (LST) analysis to evaluate localized air quality impacts to sensitive receptors in the immediate vicinity of the project as a result of project activities. The impacts were analyzed using methods consistent with those in the SCAQMD's Final Localized Significance Threshold Methodology (SCAQMD 2008a). The project is located within Source-Receptor Area 5 (Southeast LA County). This analysis applies the SCAQMD LST values for a 5-acre site within Source-Receptor Area 5 with a receptor distance of 50 meters (164 feet).

Project construction activities would result in temporary sources of on-site criteria air pollutant emissions associated with off-road equipment exhaust and fugitive dust generation. According to the Final Localized

[9] The CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145).

Significance Threshold Methodology, "off-site mobile emissions from the project should not be included in the emissions compared to the LSTs" (SCAQMD 2008a). Trucks and worker trips associated with the project are not expected to cause substantial air quality impacts to sensitive receptors along off-site roadways since emissions would be relatively brief in nature and would cease once the vehicles pass through the main streets. Off-site emissions from truck trips were limited to 1,000 feet of estimated on-site activity within the LST analysis. The maximum daily on-site emissions generated by construction of the project in each construction year are presented in Table 7 and compared to the SCAQMD localized significance criteria for Source-Receptor Area 5 to determine whether project-generated on-site emissions would result in potential LST impacts.

Table 7. Construction Localized Significance Thresholds Analysis

Year	NO_2	CO	PM_{10}	$PM_{2.5}$
	Pounds per Day (On Site)[a]			
2021	40.50	25.45	9.09	5.75
2022	12.54	16.49	0.65	0.61
Maximum	**40.50**	**25.45**	**9.09**	**5.75**
SCAQMD LST Criteria	*165*	*1,855*	*42*	*10*
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: SCAQMD 2008a; Appendix B.
Notes: NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); $PM_{2.5}$ = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.
Maximum on-site emissions occurred during the overlap of the following phases: grading and site preparation.
[a] LST are shown for a 5-acre disturbed area corresponding to a distance to a sensitive receptor of 50 meters in Source-Receptor Area 5 (Southeast LA County).

As shown in Table 7, proposed construction activities would not generate emissions in excess of site-specific LSTs.

CO Hotspots

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed "CO hotspots." The transport of CO is extremely limited, as it disperses rapidly with distance from the source. Under certain extreme meteorological conditions, however, CO concentrations near a congested roadway or intersection may reach unhealthy levels, affecting sensitive receptors. Typically, high CO concentrations are associated with severely congested intersections operating at an unacceptable level of service (LOS) (LOS E or worse is unacceptable). Projects contributing to adverse traffic impacts may result in the formation of a CO hotspot. Additional analysis of CO hotspot impacts would be conducted if a project would result in a significant impact or contribute to an adverse traffic impact at a signalized intersection that would potentially subject sensitive receptors to CO hotspots. Due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing. Additionally, as discussed in Section 3.17 of this IS/MND, transportation impacts would be less than significant. Based on these considerations, the project would result in a less-than-significant impact to air quality with regard to potential CO hotspots.

Operational Health Risk Assessment

In addition to impacts from criteria pollutants, certain projects may include emissions of pollutants identified by the state and federal government as toxic air contaminants (TACs) or hazardous air pollutants. State law has established the framework for California's TAC identification and control project, which is generally more stringent than the federal project, and is aimed at TACs that are a problem in California. The state has formally identified more than 200 substances as TACs, including the federal hazardous air pollutants, and is adopting appropriate control measures for sources of these TACs.

The Office of Environmental Health Hazard Assessment's (OEHHA's) most recent guidance is the 2015 Risk Assessment Guidelines Manual (OEHHA 2015), which was adopted in 2015 to replace the 2003 Health Risk Assessment (HRA) Guidance Manual. The Children's Environmental Health Protection Act of 1999 (Senate Bill [SB] 25), which requires explicit consideration of infants and children in assessing risks from air toxics, requires revisions of the methods for both non-cancer and cancer risk assessment and of the exposure assumptions in the 2003 HRA Guidance Manual. Cancer risk parameters, such as age-sensitivity factors, daily breathing rates, exposure period, fraction of time at home, and cancer potency factors, were based on the values and data recommended by OEHHA as implemented in HARP2 (Hot Spots Analysis and Reporting Program). SCAQMD's Modeling Guidance for American Meteorological Society/EPA Regulatory Model (AERMOD) (SCAQMD 2018) and Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis (SCAQMD 2003b) provides guidance to perform dispersion modeling for use in HRAs within the SCAB.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends a carcinogenic (cancer) risk threshold of 10 in one million. Some TACs increase noncancer health risk due to long-term (chronic) exposures. The Chronic Hazard Index (HIC) is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system. The HIC estimates for all receptor types used the 'OEHHA Derived' calculation method, which uses high-end exposure parameters for the inhalation and next top two exposure pathways and mean exposure parameters for the remaining pathways for non-cancer risk estimates. The HIC is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system.[10] A hazard index less than 1.0 means that adverse health effects are not expected. Within this analysis, noncarcinogenic exposures of less than 1.0 are considered less than significant. The SCAQMD recommends a HIC significance threshold of 1.0 (project increment) and an acute hazard index of 1.0. The exhaust from diesel engines is a complex mixture of gases, vapors, and particles, many of which are known human carcinogens. Diesel particulate matter (DPM) has established cancer risk factors and relative exposure values for long-term chronic health hazard impacts. No short-term, acute relative exposure values are established and regulated and are therefore not addressed in this assessment.

CARB's Air Quality and Land Use Handbook: A Community Health Perspective encourages consideration of the health impacts of distribution centers that accommodates more than 100 trucks per day on sensitive receptors sited within 1,000 feet from the source in the land use decision-making process (CARB 2005). For the operational health risk, the operation year 2022 was assumed consistent with completion of project construction. Emissions from the operation of the project include truck trips and truck idling emissions. For risk assessment purposes, PM_{10} in diesel exhaust is considered DPM, originating mainly from truck

[10] The Chronic Hazard Index estimates for all receptor types used the OEHHA Derived calculation method (OEHHA 2015).

traveling on site and off site and trucks idling located at the loading docks. Truck travel and idling emission rates were obtained from CARB's EMFAC2017. Emission factors representing the vehicle mix and emissions for 2022 were used to estimate emissions associated with operation of the project. Truck idling would be limited to 5 minutes in accordance with CARB's adopted Airborne Toxic Control Measure; however, truck idling was conservatively assumed to idle for 15 minutes.[11] Therefore, the analysis conservatively overestimates DPM emissions from idling. All truck operations would occur Monday through Sunday. Electric-powered forklifts will be operated in the loading dock areas.

Conservatively, a 2022 EMFAC2017 run was conducted and a constant 2022 emission factor data set was used for the entire duration of the analysis (i.e., 30 years). Use of the 2022 emission factors would overstate potential impacts since this approach does not include reductions in emissions due to fleet turnover or cleaner technology with lower emissions. The truck travel DPM emissions were calculated by applying the exhaust PM_{10} emission factor from EMFAC2017 and the total truck trip number over the length of the distance traveled. In addition, the on-site truck idling exhaust emissions were calculated by applying the idle exhaust PM_{10} emission factor from EMFAC2017 and total truck trip over the total idling time (i.e., 15 minutes).

The dispersion modeling was performed using AERMOD (version 18081). The truck traffic was modeled as a line of adjacent volume sources from I-605 to the project site and truck travel on site to estimate emissions at proximate receptors. Based on the TIA, 80% of the truck trips were modeled exiting and entering the project site to the north along Woodruff Avenue and 20% were modelled exiting and entering the project site to the south along Woodruff Avenue. Truck idling was modeled as stationary sources.

As previously described, health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends a carcinogenic (cancer) risk threshold of 10 in 1 million. Some TACs increase non-cancer health risk due to long-term (chronic) exposures. A hazard index less than 1.0 means that adverse health effects are not expected. Within this analysis, noncarcinogenic exposures of less than 1.0 are considered less than significant. The exhaust from diesel engines is a complex mixture of gases, vapors, and particles, many of which are known human carcinogens. DPM has established cancer risk factors and relative exposure values for long-term chronic health hazard impacts. As stated previously, no short-term, acute relative exposure values are established and regulated; thus, they are not addressed in this assessment.

Dudek evaluated the project's potential cancer and noncancer health impacts using exposure periods appropriate to evaluate long-term emission increases (third trimester of pregnancy to 30 years). Emissions dispersion of DPM was modeled using AERMOD, then cancer risk and noncancer health impacts subsequently using the CARB HARP2 (Air Dispersion Modeling and Risk Tool, version 19121). The chemical exposure results were then compared to SCAQMD thresholds to assess project significance. Principal parameters of this modeling are presented in Table 8.

[11] Although the project is required to comply with CARB's idling limit of 5 minutes, on-site idling emissions was estimated for 15 minutes of truck idling, which would take into account on-site idling while the trucks are waiting to pull up to the loading dock, idling at the loading dock, and idling during check-in and check-out.

Table 8. Operational Health Risk Assessment American Meteorological Society/EPA Regulatory Model Operational Principal Parameters

Parameter	Details
Meteorological Data	The SCAQMD requires the use of AERMOD for air dispersion modeling. The latest 5-year meteorological data for Fullerton Municipal Airport station (Station ID 3166) from SCAQMD were downloaded, then input to AERMOD. For cancer or chronic noncancer risk assessments, the average cancer risk of all years modeled was used.
Urban versus Rural Option	Urban dispersion option was selected due to the developed nature of the project area and per SCAQMD guidelines. Los Angeles County's population 9,818,605 was used in the analysis (SCAQMD 2018).
Terrain Characteristics	Digital elevation model files were imported into AERMOD so that complex terrain features were evaluated as appropriate. Per SCAQMD guidance, the National Elevation Dataset (NED) dataset with resolution of 1/3 arc-second was used (SCAQMD 2018).
Emission Sources and Release Parameters	Air dispersion modeling of operational activities was conducted using emissions generated using EMFAC2017.
Source Release Characterizations	Off-site and on-site truck travel were modeled as a line of adjacent volume sources, and based on EPA methodology, the modeled sources would result in a release height of 3.4 meters, a plume height of 3.16 meters, and a plume width of 1.56 meters (EPA 2015). The truck idling emissions were modeled as a stationary source with a 4-meter exhaust height and 0.1-meter exhaust diameter (EPA 2015; SCAQMD 2003b; SJVAPCD 2006). The project and nearby buildings were modeled to account for building downwash.

Note: AERMOD = American Meteorological Society/Environmental Protection Agency Regulatory Model; SCAQMD = South Coast Air Quality Management District; EPA = U.S. Environmental Protection Agency.
See Appendix B.

This HRA evaluated impacts using a uniform Cartesian grid of receptors spaced 50 meters apart, at residential receptors located approximately within 1,000 meters from the project site, and then converted to discrete receptors.

For the operational health risk, the HRA assumes exposure would start in the third trimester of pregnancy through 30 years for all residential sensitive receptor locations. The exposure duration for a student would start at age 5 through age 10 at the nearby elementary school (AL Gauldin Elementary School). The SCAQMD has also established noncarcinogenic risk parameters for use in HRAs since some TACs increase non-cancer health risk due to long-term (chronic) exposures. Noncarcinogenic risks are quantified by calculating a hazard index, expressed as the ratio between the ambient pollutant concentration and its toxicity or relative exposure level, which is a concentration at or below which health effects are not likely to occur. The chronic hazard index is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system, similarly calculated for acute hazard index. The results of the HRA during operation are provided in Table 9.

Table 9. Operational Health Risk Assessment Results

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk – Residential	Per Million	7.71	10	Less than Significant
MICR—Student	Per Million	0.30	1.0	Less than Significant

Table 9. Operational Health Risk Assessment Results

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
HIC	Index Value	0.002	1.0	Less than Significant

Source: SCAQMD 2019; Appendix B.
Notes: CEQA = California Environmental Quality Act; MICR = maximum individual cancer risk; HIC = Chronic Hazard Index.

The results of the operational analysis demonstrate that the exhibit maximum individual cancer risk for the student and residential receptors are below the 10 and 1.0 in a million thresholds, respectively and below the HIC threshold. Therefore, no long-term impacts associated with exposing sensitive receptors to substantial pollutant concentrations would occur, and the level of impact would be less than significant.

Effects of Criteria Air Pollutants

Construction and operation of the project would generate criteria air pollutant emissions; however, estimated construction and operational emissions would not exceed the SCAQMD mass-emission daily thresholds as shown in Tables 5 and 6, respectively. As previously discussed, the SCAB has been designated as a federal nonattainment area for O_3 and $PM_{2.5}$ and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$.

Health effects associated with O_3 include respiratory symptoms, worsening of lung disease leading to premature death, and damage to lung tissue (CARB 2019b). VOCs and NO_x are precursors to O_3, for which the SCAB is designated as nonattainment with respect to the NAAQS and CAAQS. The contribution of VOCs and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SCAB due to O_3 precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O_3 ambient air quality standards tend to occur between April and October when solar radiation is highest. The holistic effect of a single project's emissions of O_3 precursors is speculative because of the lack of quantitative methods to assess this impact. Because construction and operation of the project would not result in O_3 precursor emissions (i.e., VOCs or NO_X) that would exceed the SCAQMD thresholds, as shown in Tables 5 and 6, the project is not anticipated to substantially contribute to regional O_3 concentrations and their associated health impacts.

Health effects associated with NO_x include lung irritation and enhanced allergic responses (CARB 2019b). Construction and operation of the project would not generate NO_x emissions that would exceed the SCAQMD mass daily thresholds; therefore, construction and operation of the project is not anticipated to contribute to exceedances of the NAAQS and CAAQS for NO_2 or contribute to associated health effects. In addition, the SCAB is designated as in attainment of the NAAQS and CAAQS for NO_2, and the existing NO_2 concentrations in the area are well below the NAAQS and CAAQS standards.

Health effects associated with CO include chest pain in patients with heart disease, headache, light-headedness, and reduced mental alertness (CARB 2019b). CO tends to be a localized impact associated with congested intersections. CO hotspots were discussed previously as a less-than-

significant impact. Thus, the project's CO emissions would not contribute to the health effects associated with this pollutant.

Health effects associated with PM_{10} and $PM_{2.5}$ include premature death and hospitalization, primarily for worsening of respiratory disease (CARB 2019b). As with O_3 and NO_X, and as shown in Tables 5 and 6, the project would not generate emissions of PM_{10} or $PM_{2.5}$ that would exceed the SCAQMD's thresholds. Accordingly, the project's PM_{10} and $PM_{2.5}$ emissions are not expected to cause an increase in related health effects for this pollutant.

The California Supreme Court's *Sierra Club v. County of Fresno* (2018) 6 Cal. 5th 502 decision (referred to herein as the Friant Ranch decision; issued on December 24, 2018), addresses the need to correlate mass emission values for criteria air pollutants to specific health consequences, and contains the following direction from the California Supreme Court: "The Environmental Impact Report (EIR) must provide an adequate analysis to inform the public how its bare numbers translate to create potential adverse impacts or it must explain what the agency *does* know and why, given existing scientific constraints, it cannot translate potential health impacts further." (Italics in original.) Currently, SCAQMD, CARB, and EPA have not approved a quantitative method to reliably, meaningfully, and consistently translate the mass emission estimates for the criteria air pollutants resulting from the proposed project to specific health effects. In addition, there are numerous scientific and technological complexities associated with correlating criteria air pollutant emissions from an individual project to specific health effects or potential additional nonattainment days.

In connection with the judicial proceedings culminating in issuance of the Friant Ranch decision, the SCAQMD and the San Joaquin Valley Air Pollution Control District (SJVAPCD) filed amicus briefs attesting to the extreme difficulty of correlating an individual project's criteria air pollutant emissions to specific health impacts. Both SJVAPCD and SCAQMD have among the most sophisticated air quality modeling and health impact evaluation capabilities of the air districts in California. The key, relevant points from SCAQMD and SJVAPCD briefs is summarized herein.

In requiring a health impact type of analysis for criteria air pollutants, it is important to understand how O_3 and PM is formed, dispersed and regulated. The formation of O_3 and PM in the atmosphere, as secondary pollutants,[12] involves complex chemical and physical interactions of multiple pollutants from natural and anthropogenic sources. The O_3 reaction is self-perpetuating (or catalytic) in the presence of sunlight because NO_2 is photochemically reformed from nitric oxide (NO). In this way, O_3 is controlled by both NO_X and VOC emissions (NRC 2005). The complexity of these interacting cycles of pollutants means that incremental decreases in one emission may not result in proportional decreases in O_3 (NRC 2005). Although these reactions and interactions are well understood, variability in emission source operations and meteorology creates uncertainty in the modeled O_3 concentrations to which downwind populations may be exposed (NRC 2005). Once formed, O_3 can be transported long distances by wind and due to atmospheric transport, contributions of precursors from the surrounding region can also be important (EPA 2008). Because of the complexity of O_3 formation, a specific tonnage amount of VOCs or NO_X emitted in a particular area does not equate to a particular concentration of O_3 in that area (SJVAPCD 2015). PM can be divided into two categories: directly emitted PM and secondary PM. Secondary PM, like O_3, is formed via complex chemical reactions in the atmosphere between precursor chemicals such as SO_X and NO_X (SJVAPCD 2015). Because of the complexity of secondary PM formation, including the potential to be transported long

[12] Air pollutants formed through chemical reactions in the atmosphere are referred to as secondary pollutants.

distances by wind, the tonnage of PM-forming precursor emissions in an area does not necessarily result in an equivalent concentration of secondary PM in that area (SJVAPCD 2015). This is especially true for individual projects, like the proposed project, where project-generated criteria air pollutant emissions are not derived from a single "point source," but from construction equipment and mobile sources (passenger cars and trucks) driving to, from and around the project site.

Another important technical nuance is that health effects from air pollutants are related to the concentration of the air pollutant that an individual is exposed to, not necessarily the individual mass quantity of emissions associated with an individual project. For example, health effects from O_3 are correlated with increases in the ambient level of O_3 in the air a person breathes (SCAQMD 2015). However, it takes a large amount of additional precursor emissions to cause a modeled increase in ambient O_3 levels over an entire region (SCAQMD 2015). The lack of link between the tonnage of precursor pollutants and the concentration of O_3 and $PM_{2.5}$ formed is important because it is not necessarily the tonnage of precursor pollutants that causes human health effects; rather, it is the concentration of resulting O_3 that causes these effects (SJVAPCD 2015). Indeed, the ambient air quality standards, which are statutorily required to be set by EPA at levels that are requisite to protect the public health, are established as concentrations of O_3 and $PM_{2.5}$ and not as tonnages of their precursor pollutants (EPA 2018a). Because the ambient air quality standards are focused on achieving a particular concentration region-wide, the tools and plans for attaining the ambient air quality standards are regional in nature. For CEQA analyses, project-generated emissions are typically estimated in pounds per day or tons per year and compared to mass daily or annual emission thresholds. While CEQA thresholds are established at levels that the air basin can accommodate without affecting the attainment date for the ambient air quality standards, even if a project exceeds established CEQA significance thresholds, this does not mean that one can easily determine the concentration of O_3 or PM that will be created at or near the project site on a particular day or month of the year, or what specific health impacts will occur (SJVAPCD 2015).

In regard to regional concentrations and air basin attainment, the SJVAPCD emphasized that attempting to identify a change in background pollutant concentrations that can be attributed to a single project, even one as large as the entire Friant Ranch Specific Plan, is a theoretical exercise. The SJVAPCD brief noted that it "would be extremely difficult to model the impact on NAAQS attainment that the emissions from the Friant Ranch project may have" (SJVAPCD 2015). The situation is further complicated by the fact that background concentrations of regional pollutants are not uniform either temporally or geographically throughout an air basin, but are constantly fluctuating based upon meteorology and other environmental factors. SJVAPCD noted that the currently available modeling tools are equipped to model the impact of all emission sources in the San Joaquin Valley Air Basin on attainment (SJVAPCD 2015). The SJVAPCD brief then indicated that, "Running the photochemical grid model used for predicting O_3 attainment with the emissions solely from the Friant Ranch project (which equate to less than one-tenth of one percent of the total NO_x and VOC in the Valley) is not likely to yield valid information given the relative scale involved" (SJVAPCD 2015).

SCAQMD and SJVAPCD have indicated that it is not feasible to quantify project-level health impacts based on existing modeling (SCAQMD 2015; SJVAPCD 2015). Even if a metric could be calculated, it would not be reliable because the models are equipped to model the impact of all emission sources in an air basin on attainment and would likely not yield valid information or a measurable increase in O_3 concentrations sufficient to accurately quantify O_3-related health impacts for an individual project.

Nonetheless, following the Supreme Court's Friant Ranch decision, some EIRs where estimated criteria air pollutant emissions exceeded applicable air district thresholds have included a quantitative analysis of potential project-generated health effects using a combination of a regional photochemical grid model (PGM)[13] and the EPA Benefits Mapping and Analysis Program (BenMAP or BenMAP–Community Edition [CE])[14]. The publicly available health impact assessments (HIAs) typically present results in terms of an increase in health incidences and/or the increase in background health incidence for various health outcomes resulting from the project's estimated increase in concentrations of O_3 and $PM_{2.5}$.[15] To date, the five publicly available HIAs reviewed herein have concluded that the evaluated project's health effects associated with the estimated project-generated increase in concentrations of O_3 and $PM_{2.5}$ represent a small increase in incidences and a very small percent of the number of background incidences, indicating that these health impacts are negligible and potentially within the models' margin of error. It is also important to note that while the results of the five available HIAs conclude that the project emissions do not result in a substantial increase in health incidences, the estimated emissions and assumed toxicity is also conservatively inputted into the HIA and thus, overestimate health incidences, particularly for $PM_{2.5}$.

As explained in the SJVAPCD brief and noted previously, running the PGM used for predicting O_3 attainment with the emissions solely from an individual project like the Friant Ranch project or the proposed project is not likely to yield valid information given the relative scale involved. The five examples reviewed support the SJVAPCD's brief contention that consistent, reliable, and meaningful results may not be provided by methods applied at this time. Accordingly, additional work in the industry and more importantly, air district participation, is needed to develop a more meaningful analysis to correlate project-level mass criteria air pollutant emissions and health effects for decision makers and the public. Furthermore, at the time of writing, no HIA has concluded that health effects estimated using the PGM and BenMAP approach are substantial provided that the estimated project-generated incidences represent a very small percent of the number of background incidences, potentially within the models' margin of error.

In summary, construction and operation of the project would not result in exceedances of the SCAQMD significance thresholds for certain criteria pollutants, and potential health effects associated with criteria air pollutants would be less than significant.

In addition, an analysis of the project's potential to exceed the SCAQMD LSTs is presented above. The SCAQMD developed the LST analysis in response to CARB Governing Board's Environmental Justice Enhancement Initiative I-4. LSTs represent the maximum emissions from a project that will not cause or contribute to an

13 The first step in the publicly available HIAs includes running a regional PGM, such as the Community Multiscale Air Quality model or the Comprehensive Air Quality Model with extensions to estimate the increase in concentrations of O_3 and $PM_{2.5}$ as a result of project-generated emissions of criteria and precursor pollutants. Air districts, such as the SCAQMD, use photochemical air quality models for regional air quality planning. These photochemical models are large-scale air quality models that simulate the changes of pollutant concentrations in the atmosphere using a set of mathematical equations characterizing the chemical and physical processes in the atmosphere (EPA 2017).

14 After estimating the increase in concentrations of O_3 and $PM_{2.5}$, the second step in the five examples includes use of BenMAP or BenMAP-CE to estimate the resulting associated health effects. BenMAP estimates the number of health incidences resulting from changes in air pollution concentrations (EPA 2018b). The health impact function in BenMAP-CE incorporates four key sources of data: (i) modeled or monitored air quality changes, (ii) population, (iii) baseline incidence rates, and (iv) an effect estimate. All of the five example HIAs focused on O_3 and $PM_{2.5}$.

15 The following CEQA documents included a quantitative HIA to address Friant Ranch: (1) California State University Dominguez Hills 2018 Campus Master Plan EIR (CSU Dominguez Hills 2019), (2) March Joint Powers Association K4 Warehouse and Cactus Channel Improvements EIR (March JPA 2019), (3) Mineta San Jose Airport Amendment to the Airport Master Plan EIR (City of San Jose 2019), (4) City of Inglewood Basketball and Entertainment Center Project EIR (City of Inglewood 2019), and (5) San Diego State University Mission Valley Campus Master Plan EIR (SDSU 2019).

exceedance of the most stringent applicable NAAQS or CAAQS (which are health protective standards) at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area, project size, and distance to the nearest sensitive receptor. LSTs has been developed for NO_2, CO, PM_{10}, and $PM_{2.5}$. As presented above, the project's localized construction emissions would not exceed site-specific LSTs, and impacts would be less than significant.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The occurrence and severity of potential odor impacts depend on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the project. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. In addition, in terms of odors during operation, land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The project entails operation of an industrial/warehouse facility and does not include any of the aforementioned odor-generating uses or activities. Therefore, no impacts associated with other emissions, including odors, would occur, and the level of impact would be less than significant.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
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 U.S. Fish and Wildlife Service?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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) Would the project 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?

Less-than-Significant Impact with Mitigation Incorporated. The project site is located in a highly developed part of the City and is surrounded by an urbanized mix of land uses. The nearest open space area as identified by the City's General Plan is Independence Park, which is located approximately 0.4 miles to the southwest of the project site. Due to the intervening development between the project site and this open space area, there is no direct connection between the project site and this parkland area.

No native habitat is located on the project site or in the immediately surrounding area. The project site consists of a fully developed parcel with an existing industrial use. Plant species surrounding the project site are limited to non-native, ornamental species located within the public right-of-way, including turf grass and palm species. These non-native, ornamental plant species form a non-cohesive plant community that is not known to support any candidate, sensitive, or special-status plant species. Based on the developed nature of the project site and surrounding area, wildlife species that could occur on site include common species typically found in urbanized settings, such as house sparrow (*Passer domesticus*), mourning dove (*Zenaida macroura*), and western fence lizard (*Sceloporus occidentalis*). As such, wildlife species that can reasonably be expected to occur on the project site would not be considered candidate, sensitive, or special-status wildlife species.

Ornamental landscape trees that are currently located on the project site may require removal prior to construction of the project. Because of the existing development on the project site and the existing development around the site, it is unlikely that the existing trees would provide desirable nesting opportunities for bird/raptor species, especially considering that more suitable nesting options likely occur within the broader project area. Nonetheless, per MM-BIO-1, if construction activities were to occur during nesting season (typically between February 1 and September 1), the project applicant would be required to conduct pre-construction nesting bird surveys to ensure that no nests are located within the ornamental trees adjacent to the project site, in accordance with California Fish and Game Code Sections 3503, 3503.5, 3513, and 3800. Compliance with MM-BIO-1 would ensure that the project would not result in impacts to a protected bird species. Therefore, impacts associated with candidate, sensitive, or special-status species would occur.

MM-BIO-1 Prior to the issuance of a demolition, grading, and/or building permit for activities during the avian nesting season (i.e., February 1 and September 1), the project applicant shall submit a survey for active nests to the City of Downey Building & Safety Division conducted by a qualified biologist a maximum of 1 week prior to the activities to determine the presence/absence, location, and status of any active nests on or adjacent to the project site. The nesting bird survey shall consist of full coverage of the project footprint and an appropriate buffer, as determined by the biologist. If no active nests are discovered or identified, no further mitigation is required. In the event that active nests are discovered on site, a suitable buffer determined by the biologist shall be established around any active nest. No ground-disturbing activities shall occur within this buffer until the biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Limits of construction to avoid a nest shall be established in the field by the biologist with flagging and stakes or construction fencing. Construction personnel shall be instructed regarding the ecological sensitivity of the fenced area. The results of the survey shall be documented and filed with the City of Downey within 5 days after the survey.

b) Would the project 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 U.S. Fish and Wildlife Service?

No Impact. No native habitat is located on the project site or in the immediately surrounding area. The project site consists of a fully developed parcel with an existing industrial use. Plant species surrounding the project site are limited to non-native, ornamental species located within the public right-of-way, including turf grass and palm species. These non-native, ornamental plant species form a non-cohesive plant community. Therefore, no impacts to riparian or sensitive vegetation communities would occur as result of the project.

c) Would the project 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. No federally defined waters of the United States or state occur within the project site. This includes the absence of federally defined wetlands and other waters (e.g., drainages) and state-defined waters (e.g., streams and riparian extent. In addition, the project would be subject to typical restrictions and requirements that address erosion and runoff (e.g., best management practices [BMPs]), including

those of the Clean Water Act and National Pollutant Discharge Elimination System (NPDES) permit. Therefore, no impacts to jurisdictional waters or wetlands would occur.

d) Would the project 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?

No Impact. Although some local movement of wildlife is expected to occur within the broader City, the City is not recognized as an existing or proposed Significant Ecological Area that links migratory populations, as designated by the County (County of Los Angeles 2019). The project site is located within a highly urbanized area, and the site is currently surrounded by other industrial uses, which would greatly prohibit any incidental wildlife movement, in the unlikely scenario that any movement occurs in the project area. Construction of the project would not interfere with the movement of any native residents, migratory fish, or wildlife species. Therefore, no impacts associated with wildlife movement or wildlife corridors would occur.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. Ornamental landscape trees that are currently located on the project site may require removal prior to construction of the project. However, the City does not have any local policies or ordinances protecting trees located on private property. As such, implementation of the project would not conflict with local policies. Therefore, no impacts associated with local policies or ordinances protecting biological resources would occur.

f) Would the project 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 not located within any habitat conservation plan; natural community conservation plan; or other approved local, regional, or state habitat conservation plan area. Therefore, no impacts associated with an adopted conservation plan would occur.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
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?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

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

Less-than-Significant Impact. As defined by the CEQA Guidelines, a "historical resource" is considered to be a resource that is listed in or eligible for listing in the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR), has been identified as significant in a historical resource survey, or is listed on a local register of historical resources.

The proposed project includes demolition of an existing, 74,662-square-foot industrial building located at 12021-12023 Woodruff Avenue, Downey, California 90241 (subject property) on a 6.31-acre parcel (AIN 6284-025-018) originally developed in 1951 for Kirkhill Manufacturing Inc. No previously recorded historical resources were identified within the project site as a result of the California Historical Resources Information System records search, Native American Heritage Commission Sacred Lands File search, extensive archival research, field survey, and property significance evaluation. However, 12021–12023 Woodruff Avenue, the project site, contains three buildings constructed over 45 years ago that could potentially be eligible for listing in the CRHR/NRHP.

The criteria for listing resources in the CRHR were developed to be in accordance with previously established criteria developed for listing in the NRHP. Thus, the criteria listed below is expressed in accordance with the NRHP criteria. According to California Public Resources Code, Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains "substantial integrity," and (ii) meets at least one of the following criteria:

(1) Is associated with events that have made a significant contribution to the broad pattern of our history
(2) Is associated with the lives of persons important in our past
(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values
(4) Has yielded, or may be likely to yield, information important in prehistory or history

Under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (California Public Resources Code, Section 21084.1; 14 CCR 15064.5(b)). If a site is listed or eligible for listing in the CRHR, included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code, Section 5024.1(q)), it is a "historical resource" and is presumed to be

historically or culturally significant for the purposes of CEQA (California Public Resources Code, Section 21084.1; 14 CCR 15064.5(a)).

In compliance with CEQA, the subject property was evaluated under the four CRHR criteria outlined above to determine its eligibility for listing in the CRHR or NRHP, and accordingly, its historical significance.

As a result of the historic significance evaluations, the Kirkhill Manufacturing Inc. property located at 12021–12023 Woodruff Avenue (AIN: 6284-025-018) does not appear eligible for listing in the NRHP or CRHR due to a lack of significant historical associations, architectural merit, and physical integrity. Therefore, this property is not considered an historical resource for the purposes of CEQA. Furthermore, no potential indirect impacts to historical resources were identified. A discussion of the resource and the associated evaluation findings are presented below. Additional details are provided in the Cultural Resources Technical Report prepared for the project and included as Appendix A.

Property Description. The subject property at 12021–12023 Woodruff Avenue proposed for demolition features three geographically distinct, but interconnected building wings: the main office, the north warehouse, and the south warehouse, constructed in 1951. The three wings are connected by interior hallways, as well as, a paved, U-shaped access driveway and parking area that extends around the perimeter of the building on the north, west, and south sides.

The main office wing (1951, multiple expansions) is a one-story, Mid-Century Modern-style building featuring a flat roof and decorative breezeway block screens. The building is clad in a combination of flat brick and scored stucco in broad sections. The flat roof extends out to form a covered walkway along the front of the building. The primary entrance features a single, replaced full-lite door located at the center of the east (main) elevation that is surrounded by two fixed windows and a fixed transom. The north and south sections of the building show evidence of multiple modifications and expansion over time displayed by incompatible rooflines and blunt transitions between exterior cladding materials.

The north warehouse (1951, multiple expansions) wing is located northwest of the main office and consists of two different utilitarian-style sections: a two-story section clad in ribbed metal siding atop a concrete-masonry unit substructure; and a tri-gable, one-story section which faces the western property line. The two-story section of the north warehouse sits immediately behind the main office volume and features a shallow, front-facing gable roof supported by heavy steel framing. The roof is clad in ribbed metal material and contains multiple skylights as well as clerestory windows on the south elevation. The main entry point for this section of the building is a large roll-up metal door. Additional doors are found throughout the elevation, but they appear to function as emergency doors and not as primary points of entry. The one-story, tri-gabled section of the north warehouse is located to the west of the two-story section. This segment of the building is clad in a ribbed metal siding in both a metallic and white color. Each of the three, equally sized bays contains a single or a double metal roll-up door that provides access to the interior areas. The northern wall on this section is faced with concrete masonry to correspond with the two-story section.

The south warehouse (1951, multiple expansions) is located to the southwest of the main office wing and south of the north warehouse. This building section features a front gable roof and a west elevation clad in a ribbed metal material. The south elevation consists of a broad wall of built from concrete-masonry units that run the length of this elevation. The entire stretch of this elevation is punctuated only by two full-leaf

doors, a metal roll-up door, a sliding glass door with a small metal awning, and two decorative breezeway block screens shading a window on the east side of the elevation.

All three wing buildings have undergone extensive alterations and expansions between 1951 and present (Figure 15, Expansion of the Kirkhill Manufacturing Inc. Building). Twenty-six (26) permits have been filed for the property, and numerous observed alterations and review of aerial photographs are noted. A complete description of these alterations, detailed descriptions of historical aerial photographs and complete list of permits may be found in Appendix A.

Significance Evaluation. Thomas Kirk Hill founded The Mechanical Rubber Company in the City of Los Angeles in 1919 to produce rubber seals and flexible connectors for plumbing and industrial use. In 1926, the company was renamed the Kirkhill Rubber Company. As the demand for rubber products grew, the company enlarged the original plant during the 1930s. Prompted by the escalation of the aeronautical industry in Los Angeles County in response to World War II, the Kirkhill Rubber Company divided into two separate companies in 1941: Kirkhill Rubber Company remained focused on the manufacturing of rubber products related to plumbing and industrial goods, while the new branch of the company, Kirkhill Manufacturing Inc., focused on the production of seals related to aerospace products. In 1949, the Kirkhill Rubber Company completed a new, 360,000-square-foot facility in Brea, California, that was capable of employing over 1,000 people. The Brea facility was expanded by 50,000 square feet in 1950, allowing it to become the center of operations and production for both Kirkhill companies. In 1951, as North American Aviation (a prominent aviation company) developed new, jet-propelled aircraft, Kirkhill Manufacturing Inc. established a comparatively smaller plant in Downey to maintain close proximity to the rapid-paced-development in the Downey aerospace industry. A permit for an expansion of the Downey plant in 1955 suggests that the plant employed only 60 people, which was a nominal fraction of the overall company employment during this period (LAT 1950; Kirkhill Inc. 2019; City of Downey Permit 1955).

Based on a review of historical aerial photographs and building permits (see Appendix A for a complete discussion of aerial photographs and building permits), the region of Downey that comprises the project site remained undeveloped farmland until the late-1940s. The first industrial development along this stretch of Woodruff Avenue between Stewart and Gray Road and Washburn Road did not take place until the period between 1947 and 1951. The subject property, the Kirkhill Manufacturing Inc. building located at 12021–12023 Woodruff Avenue, first appears in the 1952 historical aerial photograph, and Los Angeles County Assessor data indicates that it was constructed in 1951. The original architect for the facility as well as the architect(s) who designed the subsequent additions were not discovered during the course of research for this project. Subsequent City of Downey permits and aerial photographs of the plant suggest that the plant has undergone numerous, major expansions that have effectually tripled the square-footage of the original Mid-Century Modern building (UCSB 2020; NETR 2020; Los Angeles Co. Assessor 2020).

The subject property is not eligible under NRHP/CRHR Criterion A/1 for its associations with historical events. Archival research indicates that by the time the Downey branch facility of Kirkhill Manufacturing Inc. was completed in 1951, parent company Kirkhill Rubber Company had already been manufacturing rubber products for aerospace projects for 10 years, and the Downey location was secondary to the Brea location, established 2 years earlier in 1949. Archival research indicates the Brea plant served as the center of operations during the 1950s through the 1980s, a period when Downey earned a reputation as an epicenter of aerospace engineering. However, the Downey location is not referenced in connection with any specific achievement credited to the Kirkhill Manufacturing Inc. The plant in Downey has not made a

significant contribution to the local, state, or national history. While the current tenants of the building, Kirkhill Manufacturing Company Inc., continue to use the Kirkhill company name, the original Kirkhill Manufacturing Inc. was sold and restructured multiple times during the 1990s. Therefore, the current Kirkhill Manufacturing Company Inc. does not maintain continuous association to the company started by Thomas Kirk Hill in 1919 that went on to assist in the engineering of aerospace industries. Moreover, with subsequent additions and alterations, the building no longer represents the time period in which the events for which the company gained notoriety within the field of aerospace design took place.

The subject property is not eligible under NRHP/CRHR Criterion B/2 for its association with significant persons. Archival research did not indicate that any previous property owners or employees are known to be historically significant figures at the national, state, or local level. As such, this property is not known to have any historical associations with people important to the nation's or state's past.

The subject property is not eligible under NRHP/CRHR Criterion C/3 for architectural or engineering merit. Construction of the subject property began in 1951, and the original building design would go on to receive five major additions in the years 1954, 1955, 1971, 1973, and 1976. The original 1951 building was a modest and unremarkable example of the Mid-Century Modern-style buildings designed for industrial and commercial uses following the end of World War II. Furthermore, the popularity of the architectural style in Southern California and its widespread use resulted in the creation of hundreds of buildings in this style that have a higher level of integrity, association with notable architects, and a higher level of architectural merit that that shown at the subject property. Therefore, the subject property cannot be considered a distinctive example of a Mid-Century Modern industrial building, nor can it be considered representative of a significant and distinguishable entity whose components lack individual distinction. Furthermore, as the original architect was not discovered during the course of research for this project, the building is not known to be the work of a master architect. The property as a whole has been altered beyond recognition, diminishing the already modest architectural value of the property. These alterations and major additions have caused the building to lose integrity in the areas of design, materials, and workmanship.

No evidence was found to warrant consideration under NRHP/CRHR Criterion D/4, which applies to resources that may yield important information for prehistory or history. The property is also not eligible as a contributor to a larger historic district.

The subject property (retains integrity of location, but does not retain requisite integrity of setting, design, materials, workmanship, feeling, or association. Therefore, the subject property does not retain the requisite integrity and does not rise to the level of significance required for designation at the national, state, or local levels. A complete discussion of integrity is provided in Appendix A.

In consideration of a lack of significant historical associations, architectural merit, and physical integrity, the Kirkhill Manufacturing Inc. property located at 12021–12023 Woodruff Avenue (AIN 6284-025-018) is not eligible for NRHP or CRHR. Therefore, this property is not considered an historical resource for the purposes of CEQA. No historical resources were identified near this property, and no additional potential indirect impacts to historical resources were identified as a result of the record search. Therefore, impacts associated with historical resources under CEQA would be less than significant.

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

Less-than-Significant Impact with Mitigation Incorporated. No archaeological resources were identified within the project site through the California Historical Resources Information System records search or Native American Heritage Commission Sacred Lands File review. An archaeological pedestrian survey was not conducted as the project site is developed with no exposed ground surface.

A review of property permits and archival/historic maps was conducted to better understand land uses and previous depths of disturbance as it relates to proposed ground disturbances. The review indicates the project site remained undeveloped farmland until the late 1940s, and development within the project site was not depicted in aerial images until 1952. Building permits indicate incremental development to the project site and vicinity occurred from the 1950s through to the 1990s primarily along perimeter of the project site.

While past ground disturbance has significantly modified most areas with the potential to support archaeological deposits within the project site, there remains some potential to encounter unknown archaeological resources during construction in less developed areas during the course of project construction. Management recommendations are provided in mitigation measure (MM) CUL-1 to reduce potential impacts to unanticipated archaeological resources during construction activities. Therefore, with incorporation of mitigation, potentially significant impacts to archaeological resources would be reduced to a less-than-significant level.

MM-CUL-1 **Inadvertent Discovery of Archaeological Resources.** In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under the California Environmental Quality Act (CEQA; 14 CCR 15064.5(f); PRC Section 21083.2), the archaeologist may simply record the find and allow work to continue. However, if the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery, may be warranted.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less-than-Significant Impact. There is no indication that human remains are present within the boundaries of the project site. Therefore, the likelihood of encountering human remains within the project site is considered low. In the event human remains are inadvertently encountered during construction activities, impacts would be potentially significant. In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the Los Angeles County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, they shall notify the Native American Heritage Commission in Sacramento within 48 hours. In accordance with California Public Resources Code, Section 5097.98, the Native American Heritage

Commission must immediately notify those persons it believes to be the Most Likely Descendant of the deceased Native American. The Most Likely Descendent shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains. Compliance with these requirements would ensure that human remains, if discovered, are treated properly and that significant effects to human remains would not occur in the event of an inadvertent discovery. Therefore, with compliance with state law, impacts associated with human remains would be less than significant.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy – Would the project:				
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?	☐	☐	☒	☐

a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less-than-Significant Impact. Implementation of the project would decrease the demand for electricity and natural gas at the project site and an increase in petroleum consumption in the project area during operation relative to existing uses. Detailed analysis is provided for the project below in the categories of electricity consumption, natural gas consumption, and petroleum consumption.

Electricity

Construction Use

Temporary electric power for as-necessary lighting and electronic equipment would be provided by Southern California Edison (SCE). The amount of electricity used during construction would be minimal, as demand would primarily stem from use of electrically powered hand tools. The electricity used for construction activities would be temporary and minimal; therefore, project construction would not result in wasteful, inefficient, or unnecessary consumption of electricity. Impacts would be less than significant.

Operational Use

Project operation would require electricity for multiple purposes including, but not limited to, building heating and cooling, lighting, appliances, and electronics. Additionally, the supply, conveyance, treatment,

and distribution of water used by the project would indirectly result in electricity usage. CalEEMod was used to estimate the electricity demand for the existing uses that have been demolished and for the project (see Appendix B for calculations). Table 10 presents the net increase in electricity demand for the project.

Table 10. Estimated Annual Operational Energy Demand

Scenario	kWh/Year
Existing Conditions	
Buildings	490,189.00
Water/Wastewater	132,970.45
Total Existing Demand	**623,168.45**
Proposed Project	
Buildings	286,401.00
Water/Wastewater	161,237.06
Total Project Demand	**447,638.06**
Net decrease in Electricity demand (project minus existing)	**-175,529.39**

Source: Appendix B.
Notes: kWh = kilowatt-hour.

According to these estimations, the project would consume approximately 447,639 kilowatt-hours (kWh) per year. The electricity consumption at the project site for the existing uses was also calculated using CalEEMod and is estimated to be 623,168 kWh per year. As such, upon implementation of the project, electricity demand and consumption at the project site would decrease by 175,529 kWh per year (Appendix B). Electricity is supplied to the project site by SCE. Annual retail sales of electricity in SCE's service area are forecasted to be approximately 75 billion kWh in 2020 (CPUC 2018). The electricity consumption that would be associated with the project represents approximately 0.0006% of SCE's total forecasted electricity sales in 2020. As such, the increase in electricity demand at the project site would be negligible relative to the electricity use in SCE's service area.

As described above, the electricity demand calculation for the project assumes compliance with Title 24 standards for 2019. Energy reductions from these measures were not accounted for in Table 10 in order to provide a conservative estimate. As such, the project's energy consumption could potentially be lower than what is shown in Table 10.

In summary, electricity consumption would decrease at the project site due to the implementation of the project and even without accounting for existing demand at the project, project electricity demand would be minimal when compared to total demand in the region. The project would also comply with and implement a variety of energy-efficiency measures, as described above, which would further reduce operational electricity consumption. For these reasons, electricity consumption of the project would not be considered inefficient or wasteful, and there would be no impact.

Natural Gas

Construction Use

Natural gas is not anticipated to be required during construction. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed under the subsection "Petroleum." Any minor amounts of natural gas that may be consumed as a result of project construction would be temporary and negligible and would not have an adverse effect; therefore, construction would not result in wasteful, inefficient, or unnecessary consumption of natural gas. Impacts would be less than significant.

Operational Use

Natural gas consumption during operation would be required for various purposes, including building heating and cooling. CalEEMod was used to estimate electricity demand for the existing uses and for the project (see Attachment A for calculations). Table 11 presents the net decrease in natural gas demand for the project.

Table 11. Annual Operational Natural Gas Demand

Scenario	kBTU/Year
Existing Uses	799,332
Proposed Project	121,909
Net decrease in Natural Gas Demand (Project minus Existing)	**-677,423**

Source: Appendix B.
Notes: kBTU = thousand British thermal units.

According to these estimations, the project would consume approximately 121,909 thousand British thermal units (kBTU) per year. The existing uses are estimated to consume 799,332 kBTU per year. As such, upon implementation of the project, natural gas demand at the project site would decrease by 677,423 kBTU per year (Appendix B). The project's natural gas demand is equivalent to 1,219 therms. Natural gas is supplied to the project site by Southern California Gas Company (SoCalGas). In 2020, natural gas demand is anticipated to be approximately 7,876 million therms per year in SoCalGas' service area (CEC 2017). Thus, the project's expected demand represents approximately 0.00001% of SoCalGas' 2020 demand. As such, the expected demand in natural gas consumption with the implementation of the project is negligible compared to SoCalGas' available supply.

As described above, the natural gas demand calculation for the project assumes compliance with Title 24 standards for 2019. However, this reduction was not accounted for in the modeling in order to provide a conservative estimate. As such, the project's natural gas use would be more efficient than what is required and would likely be lower than the calculations presented above.

In summary, although natural gas usage would decrease due to the implementation of the project, compared to existing conditions, the project would also comply with and implement a variety of energy-efficiency measures, as described above, which would further reduce operational natural gas consumption. For these reasons, the natural gas consumption of the project would not be considered inefficient or wasteful, and there would be no impact.

Petroleum

Construction Use

Petroleum would be consumed throughout construction. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction. Transportation of construction materials and construction workers would also result in petroleum consumption. Heavy-duty construction equipment, vendor trucks, and haul trucks would use diesel fuel. Construction workers would likely travel to and from the project area in gasoline-powered vehicles. Construction is expected to take approximately 11 months, beginning in 2021 and ending in 2022. Once construction activities cease, petroleum use from off-road equipment and transportation vehicles would end. Because of the short-term nature of construction and relatively small scale of the project, the project's petroleum consumption would be negligible when compared to California's daily total use of approximately 1.8 million barrels of petroleum. As such, construction would not result in wasteful, inefficient, or unnecessary consumption of petroleum, and impacts would be less than significant.

Operational Use

During operations, the majority of fuel consumption resulting from the project would involve the use of motor vehicles traveling to and from the project site, as well as fuels used for alternative modes of transportation that may be used by employees and customers of the project.

Petroleum fuel consumption associated with motor vehicles traveling to and from the project site is a function of the VMT as a result of project operation. The annual VMT attributable to the project is expected to be 5,514,728 VMT (Appendix B). Under existing conditions at the project site, the land uses that have been demolished are estimated to be associated with 4,301,115 VMT per year (Appendix B). Fuel estimates for the project and existing uses are provided in Table 12.

Table 12. Annual Operational Petroleum Demand

Scenario	Vehicle MT CO_2	kg CO_2/ Gallon	Gallons
Existing Uses			
Gasoline	625.87	8.78	71,283.60
Diesel	2,981.57	10.21	292,024.49
		Total Existing Petroleum Use	**363,308.08**
Proposed Project			
Gasoline	436.49	8.78	49,714.12
Diesel	5,433.30	10.21	532,154.75
		Total Project Petroleum Use	**581,868.87**
		Net Increase in Petroleum Demand (Project minus Existing)	**218,560.79**

Sources: Trips and vehicle CO_2 (Appendix B); kg CO_2/Gallon (The Climate Registry 2019).
Notes: MT = metric ton; CO_2 = carbon dioxide; kg = kilogram.

As depicted in Table 12, the project would consume approximately 581,869 gallons of petroleum per year during operation and the existing uses are estimated to consume approximately 363,308 gallons of

petroleum per year. As such, the project would lead to an annual net increase of 218,561 gallons of petroleum consumption. By comparison, approximately 28.7 billion gallons of petroleum are consumed in California per year (EIA 2019). The anticipated increase in consumption associated with 1 year of project operation is 0.0008% of the statewide use.

Over the lifetime of the project, the fuel efficiency of the vehicles being used by the customers and employees of the project is expected to increase. As such, the amount of petroleum consumed as a result of vehicular trips to and from the project site during operation would decrease over time. Additionally, there are numerous regulations in place that require and encourage increased fuel efficiency. For example, CARB has adopted an approach to passenger vehicles that combines the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. The approach also includes efforts to support and accelerate the number of plug-in hybrids and zero-emissions vehicles in California (CARB 2011). As such, operation of the project is expected to use decreasing amounts of petroleum over time due to advances in fuel economy.

In summary, although implementation of the project would result in an increase in petroleum use during operation, over time, vehicles would use less petroleum due to advances in fuel economy. Furthermore, when viewed on a regional scale, the project is an urban infill project located within a major population center and would serve an existing demand, commercial services, and employment opportunities within proximity to existing neighborhoods. When compared with new development projects sited on previously undeveloped land and away from population centers, infill projects are generally expected to involve fewer VMT during operation and may even help reduce regional VMT by locating residences, services, and jobs within proximity to existing businesses and neighborhoods. Given these considerations, the petroleum consumption associated with the project would not be considered inefficient or wasteful, and impacts would be less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less-than-Significant Impact. The project would be subject to and would comply with, at a minimum, the California Building Energy Efficiency Standards (24 CCR, Part 6). Part 6 of Title 24 establishes energy efficiency standards for nonresidential buildings constructed in California to reduce energy demand and consumption. As such, the project would comply with the California code requirements for energy efficiency.

Part 11 of Title 24 sets forth voluntary and mandatory energy measures that are applicable to the project under the California Green Building Standards, also known as CALGreen. CALGreen institutes mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, high-rise residential, state-owned buildings, schools, and hospitals, as well as certain residential and nonresidential additions and alterations. On this basis, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
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 off-site 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) Would the project 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.

No Impact. According to the City's General Plan Safety Element, no active faults have been identified within the City. According to Figure 5.5-1, Regional Earthquake Fault Lines, in the General Plan Safety Element, the closest faults in the broader project region include the Norwalk Fault, Whittier Fault, Compton–Los Alamitos Fault, and Newport–Inglewood Fault. None of these faults underlie either the City or the project site (City of Downey 2005). Thus, although the project could experience strong seismic ground shaking (see Section 3.7(a)(ii)), the project site is not susceptible to surface rupture. Therefore, no impacts associated with fault rupture would occur.

ii) Strong seismic ground shaking?

Less-than-Significant Impact. Similar to other areas located in the seismically active Southern California region, the City is susceptible to ground shaking during an earthquake. However, as addressed in Section 3.7(a)(i), the project site is not located within an active fault zone, and the site would not be affected by ground shaking more than any other area in the seismically active region. Additionally, as set forth in Article VIII of the City's Municipal Code, the City has adopted the current California Building Code. As such, the project would be designed in accordance with all applicable design provisions established in the current 2019 edition of the California Building Code, which dictates specifications to ensure structural integrity during a seismic event.

A Geotechnical Report was prepared to address potential seismic-related impacts. The report addresses potential seismic-related impacts based on the particular characteristics of the on-site soils (Appendix D). Primarily because of the liquefaction potential found throughout the City (see Section 3.7(a)(iii)), preparation of a geotechnical report is required for most development projects. Therefore, with adherence to these requirements, as set forth in the General Plan and in the project Geotechnical Report (Appendix D to this MND), impacts associated with strong seismic ground shaking would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less-than-Significant Impact. Liquefaction typically occurs when a site is subjected to strong seismic shaking, on-site soils are less cohesive, and groundwater is encountered near the surface. The factors known to influence liquefaction potential include soil type and grain size, relative density, groundwater level, confining pressures, and intensity and duration of ground shaking. In general, materials that are susceptible to liquefaction are loose, saturated granular soils that have low fines content under low confining pressures.

Per the General Plan Safety Element, the City has the combination of silts and sands soil types and a relatively high water table that are conducive to liquefaction occurring during intense ground shaking (City of Downey 2005). The California Department of Conservation has designated all areas

in the City a liquefaction hazard zone (DOC 2020). As such, a geotechnical/soils report would be prepared to address potential seismic-related impacts based on the particular characteristics of the on-site soils.

As described in the Geotechnical Report (Appendix D) prepared for the project, the near-surface soils encountered within the project site generally consist of low- to moderate-strength fill and native alluvium, and the groundwater in the vicinity of the project site was estimated to be 50± feet below existing grade. Because of the depth to groundwater, the potential for seismic-related failure is low, but in order to limit the potential for excessive settlement of building foundations, remedial grading will be necessary to remove and replace the existing fill and a portion of the near-surface alluvial soils with compacted structural fill for support of the shallow foundation system. Soils to be exposed at finished grade are expected to exhibit a very low expansion potential. Additionally, the Geotechnical Report specifies that remedial grading should also remove any soils disturbed during demolition, prior to placement of any compacted materials. The presence of the recommended layer of newly placed compacted structural fill above the liquefiable soils would help to reduce surface manifestations that could occur as a result of liquefaction. Based on the soil conditions, new retaining walls would be designed for the site, and the structural engineer would incorporate appropriate factors of safety in the design of the retaining walls. Foundations to support new retaining walls would be designed in accordance with the general Foundation Design Parameters found within Appendix D. Therefore, with adherence to these requirements as set forth in the Geotechnical Report (Appendix D), impacts associated with seismic-related ground failure, including liquefaction, would be less than significant.

iv) Landslides?

No Impact. The project site and surrounding area are predominantly flat and lack any substantial topographical variations. No hillsides are located on or adjacent to the project site. Therefore, no impacts associated with landslides would occur.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Short-Term Construction Impacts

Less-than-Significant Impact. The project would include the demolition of an existing, 74,662-square-foot industrial building and construction of an approximately 44,162-square-foot industrial building for truck terminal use. The project site is located in an area that has been substantially altered by prior grading and construction. Demolition and excavation would result in temporary soil disturbance. Common causes of soil erosion from construction sites include stormwater, wind, and soil being tracked off site by vehicles. However, construction activities would comply with all applicable state and local regulations for erosion control. The project would be required to comply with standard regulations, including SCAQMD Rules 402 and 403, which would reduce construction erosion impacts. Rule 403 requires that fugitive dust be controlled with best available control measures so that it does not remain visible in the atmosphere beyond the property line of the emissions source (SCAQMD 2005). Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance off site (SCAQMD 1976).

Additionally, the project site is larger than 1 acre and would be subject to NPDES Construction General Permit requirements; thus, construction activities would be required to incorporate various temporary BMPs designed to prevent erosion and siltation during construction. Therefore, with adherence to these regulatory requirements, short-term demolition and construction impacts associated with soil erosion and topsoil loss would be less than significant.

Long-Term Operational Impacts

Less-than-Significant Impact. Upon completion of construction, the project site would return to similar existing conditions. Thus, there would be no exposure of soils on site such that substantial soil erosion or loss of topsoil would occur. Therefore, long-term operational impacts would be less than significant.

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

Less-than-Significant Impact. According to the City's General Plan Safety Element, the City has a combination of silts and sands soil types (City of Downey 2005). The project site is underlain by Urban land-Hueneme, drained-San Emigdio complex, which is described as discontinuous human-transported material over mixed alluvium derived from granite and/or sedimentary rock (USDA 2020).

As addressed in Section 3.7(a)(iii), all areas in the City have been identified as being located in a liquefaction hazard zone. As such, a geotechnical/soils report was prepared to address potential seismic-related impacts, based on the particular characteristics of the on-site soils. In general, the report addresses all potential seismic-related effects and includes design specifications to which construction of the project would be required to adhere in order to reduce any potential liquefaction impacts. Refer to response 3.7(a)(iii) for further details. Additionally, as discussed in the Geotechnical Report, minor ground subsidence is expected to occur in the soil below the layer of removed soil; however, any subsidence would be within acceptable parameters and would not pose a structural threat (Appendix D). Notwithstanding, adherence to the requirements and recommendations set forth in the Geotechnical Report would ensure that impacts associated with potentially unstable soils would be less than significant.

Furthermore, as previously mentioned in 3.7(a)(iv), the City has relatively flat topography and is not known to have any landslide zones. Therefore, impacts associated with unstable geologic units or soils would be less than significant.

d) Would the project 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?

Less-than-Significant Impact. Expansive soils are characterized by their potential "shrink/swell" behavior. Shrink/swell is the cyclic change in volume (expansion and contraction) that occurs in certain fine-grained clay sediments from the process of wetting and drying. Clay minerals such as smectite, bentonite, montmorillonite, beidellite, vermiculite, and others are known to expand with changes in moisture content. The higher the percentage of expansive minerals present in near-surface soils, the higher the potential for substantial expansion.

The project site is underlain by Urban land-Hueneme, drained-San Emigdio complex, which is described as discontinuous human-transported material over mixed alluvium derived from granite and/or sedimentary rock. As described in the Geotechnical Report, the near-surface soils have very low expansion potential (Appendix D). Therefore, impacts associated with expansive soil would be less than significant.

e) Would the project 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?

No Impact. The project would connect to the existing municipal sewer system and would not require a septic or alternative wastewater disposal system. Therefore, no impacts associated with the ability of soils to support septic tanks would occur.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less-than-Significant Impact with Mitigation Incorporated. A significant impact may occur if grading or excavation activities would disturb paleontological resources within the project site. The project site has been previously graded and consists of disturbed, paved land. Previous on-site development activities affected the entirety of the project site, and as such, it follows that any paleontological resources that may have once been located on the project site could have been previously disturbed. Furthermore, according to the U.S. Department of Agriculture's Web Soil Survey, the project site is underlain by Urban land-Hueneme, drained-San Emigdio complex, which is described as discontinuous human-transported material over mixed alluvium derived from granite and/or sedimentary rock (USDA 2020). Human-transported fill materials generally do not contain significant paleontological resources on or very near the surface immediately underlying the project site. Additionally, the soils underlying areas of artificial fill are Holocene-age (less than 10,000 years old) alluvium which do not typically contain vertebrate fossils. However, the possibility of a paleontological discovery cannot be discounted. Accordingly, destruction of paleontological resources or unique geologic features during site-disturbing activities associated with construction of the proposed project is considered a potential significant impact. Therefore, MM-GEO-1 is provided and would be implemented to ensure potential impacts during construction activities to paleontological resources or unique geologic features are reduced to a less-than-significant level.

MM-GEO-1 In the event that paleontological resources (fossil remains) are exposed during construction activities for the proposed project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified paleontologist, as defined by the Society of Vertebrate Paleontology's 2010 guidelines, can assess the nature and importance of the find. Depending on the significance of the find, the paleontologist may record the find and allow work to continue or recommend salvage and recovery of the resource. All recommendations will be made in accordance with the Society of Vertebrate Paleontology's 2010 guidelines and shall be subject to review and approval by the City of Downey. Work in the area of the find may only resume upon approval of a qualified paleontologist.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
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?	☐	☐	☒	☐

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less-than-Significant Impact. Climate change refers to any significant change in measures of climate (e.g., temperature, precipitation, or wind patterns) lasting for an extended period of time (i.e., decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in Earth's energy balance. The greenhouse effect is the trapping and buildup of heat in the atmosphere near the Earth's surface (the troposphere). The greenhouse effect is a natural process that contributes to regulating the Earth's temperature, and it creates a livable environment on Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008).

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride (see also CEQA Guidelines Section 15364.5).[16] The three GHGs evaluated herein are CO_2, CH_4, and N_2O because these gases would be emitted during project construction and operation.

The Intergovernmental Panel on Climate Change developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The reference gas used is CO_2; therefore, GWP-weighted emissions are measured in metric tons (MT) of CO_2 equivalent (CO_2e).

[16] Climate-forcing substances include greenhouse gases (GHGs) and other substances such as black carbon and aerosols. This discussion focuses on the seven GHGs identified in the California Health and Safety Code Section 38505; impacts associated with other climate-forcing substances are not evaluated herein.

Consistent with CalEEMod Version 2016.3.2, this GHG emissions analysis assumed the GWP for CH_4 is 25 (i.e., emissions of 1 MT of CH_4 are equivalent to emissions of 25 MT of CO_2), and the GWP for N_2O is 298, based on the Intergovernmental Panel on Climate Change's Fourth Assessment Report (IPCC 2007).

As discussed in Section 3.3, Air Quality, the project is located within SCAQMD jurisdictional boundaries. In October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold (SCAQMD 2008b). This document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association, explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 MT CO_2e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (SCAQMD 2008c). The 10,000 MT CO_2e per-year threshold, which was derived from GHG reduction targets established in Executive Order (EO) S-3-05, was based on the conclusion that the threshold was consistent with achieving an emissions capture rate of 90% of all new or modified stationary source projects.

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land-use development projects. The most recent proposal issued by SCAQMD, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

Tier 1. Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

Tier 2. Consider whether or not the project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.

Tier 3. Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO_2e per-year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO_2e per year), commercial projects (1,400 MT CO_2e per year), and mixed-use projects (3,000 MT CO_2e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO_2e per year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.

Tier 4. Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB [Assembly Bill] 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO_2e per-service population for

project-level analyses and 6.6 MT CO_2e per-service population for plan-level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

Tier 5. Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

To determine the project's potential to generate GHG emissions that would have a significant impact on the environment, its GHG emissions were compared to the SCAQMD recommended quantitative threshold of 3,000 MT CO_2e per year.

Construction Greenhouse Gas Emissions

Construction of the project would result in GHG emissions, which are primarily associated with the use of off-road construction equipment, on-road haul and vendor trucks, and worker vehicles. The SCAQMD Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold (SCAQMD 2008b) recommends that "construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies." Thus, the total construction GHG emissions were calculated, amortized over 30 years, and added to the total operational emissions for comparison with the GHG significance threshold of 3,000 MT CO_2e per year. The determination of significance, therefore, is addressed in the operational emissions discussion following the estimated construction emissions.

CalEEMod was used to calculate the annual GHG emissions based on the construction scenario described in Section 3.3. Construction of the project is anticipated to commence in March 2021, lasting a total of 11 months and reaching completion in January 2022. On-site sources of GHG emissions include off-road equipment and off-site sources include haul trucks, vendor trucks, and worker vehicles. Table 13 presents construction GHG emissions for the project from on-site and off-site emission sources.

Table 13. Estimated Annual Construction Greenhouse Gas Emissions

Year	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			
2021	383.26	0.09	0.00	385.51
2022	24.79	<0.01	0.00	24.96
			Total	**410.47**
			Amortized Emissions (over 30 years)	**13.68**

Source: Appendix B.
Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.

As shown in Table 13, the estimated total GHG emissions during construction of the project would be approximately 410 MT CO_2e. Estimated project-generated construction emissions amortized over 30 years would be approximately 14 MT CO_2e per year. As with project-generated construction air quality pollutant emissions, GHG emissions generated during construction of the project would be short-term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions. Because there is no separate GHG threshold for construction, the evaluation of significance is discussed in the operational emissions analysis in the following text.

Operational Greenhouse Gas Emissions

CalEEMod Version 2016.3.2 was used to estimate potential project-generated operational GHG emissions from area sources (landscape maintenance), natural gas combustion, electrical generation, water supply and wastewater treatment, solid waste, and off-road equipment (electric forklifts). As with the air quality analysis, mobile source GHG emissions were estimated using a spreadsheet model based on EMFAC2017 emission factors. Emissions from each category—area sources, energy sources, mobile sources, solid waste, water supply and wastewater treatment, and off-road equipment—are discussed in the following text with respect to the project. For additional details, see Section 3.3 for a discussion of operational emission calculation methodology and assumptions, specifically for area, energy (natural gas), and mobile sources. Operational year 2022 was assumed to be the first full year of operation following completion of construction.

Area Sources

CalEEMod was used to estimate GHG emissions from the project's area sources, including operation of gasoline-powered landscape maintenance equipment, which produce minimal GHG emissions. It was assumed that 100% of the landscaping equipment would be gasoline powered. Consumer product use and architectural coatings result in VOC emissions, which are analyzed in air quality analysis only, and low to no GHG emissions.

Energy Sources

The estimation of operational energy emissions was based on CalEEMod land use defaults and units or total area (i.e., square footage) of the project's land uses. For nonresidential buildings, CalEEMod energy intensity value (electricity or natural gas usage per square foot per year) assumptions were based on the California Commercial End-Use Survey database. Emissions are calculated by multiplying the energy use by the utility carbon intensity (pounds of GHGs per kilowatt-hour for electricity or 1,000 British thermal units

[kBTU] for natural gas) for CO_2 and other GHGs. Annual natural gas (non-hearth) and electricity emissions were estimated in CalEEMod using the emissions factors for SCE, which would be the energy source provider for the project. CalEEMod default energy intensity factors (CO_2, CH_4, and N_2O mass emissions per kilowatt-hour) for SCE is based on the value for SCE's energy mix. SB X1 2 established a target of 33% from renewable energy sources for all electricity providers in California by 2020, and SB 350 calls for further development of renewable energy, with a target of 50% by 2030. The CO_2 emissions intensity factor for utility energy use in CalEEMod was adjusted consistent with SCE's 2018 Corporate Sustainability Report

Mobile Sources

All details for criteria air pollutants discussed in Section 3.3 are also applicable for the estimation of operational mobile source GHG emissions. It was assumed that the warehouse would operate 7 days per week; therefore, 365 days of vehicle emissions were assumed. Regulatory measures related to mobile sources include AB 1493 (Pavley) and related federal standards. AB 1493 required that CARB establish GHG emission standards for automobiles, light-duty trucks, and other vehicles determined by CARB to be vehicles that are primarily used for noncommercial personal transportation in the state. In addition, the National Highway Traffic Safety Administration and EPA have established corporate fuel economy standards and GHG emission standards, respectively, for automobiles and light-, medium-, and heavy-duty vehicles. Implementation of these standards and fleet turnover (replacement of older vehicles with newer ones) will gradually reduce emissions from the project's motor vehicles. The effectiveness of fuel economy improvements was evaluated to the extent it was captured in the EMFAC2017 emission factors for motor vehicles in 2022.

Solid Waste

The project would generate solid waste and therefore, would result in CO_2e emissions associated with landfill off-gassing. CalEEMod default values for solid waste generation were used to estimate GHG emissions associated with solid waste.

Water and Wastewater

Supply, conveyance, treatment, and distribution of water for the project require the use of electricity, which would result in associated indirect GHG emissions. Similarly, wastewater generated by the project requires the use of electricity for conveyance and treatment, along with GHG emissions generated during wastewater treatment. Water consumption estimates for both indoor and outdoor water use and associated electricity consumption from water use and wastewater generation were estimated using CalEEMod default values.

Off-Road Equipment

As explained in Section 3.3, while the exact operational off-road equipment is unknown at this time, it was conservatively assumed that four electric-operated forklifts would operate for 8 hours per day at the project site.

The estimated operational (year 2022) project-generated GHG emissions from area sources, energy usage, motor vehicles, solid waste generation, water usage and wastewater generation, and off-road equipment are shown in Table 14.

Table 14. Estimated Annual Operational Greenhouse Gas Emissions

Emission Source	CO_2	CH_4	N_2O	CO_2e
	metric tons per year			
Baseline				
Area	<0.01	<0.01	<0.01	<0.01
Energy	198.84	0.01	<0.01	199.66
Mobile	3,575.26	0.39	0.08	3,607.44
Solid waste	11.12	0.66	0.00	27.54
Water supply and wastewater	45.61	0.33	0.01	56.42
			Baseline Total	**3,891.06**
Project				
Area	<0.01	<0.01	<0.01	<0.01
Energy	80.06	<0.01	<0.01	80.37
Mobile	5,831.08	0.70	0.8	5,869.80
Solid waste	194.08	0.06	0.00	195.65
Water supply and wastewater	9.94	0.59	0.00	24.63
Off-road equipment	45.10	0.38	0.01	57.40
			Project Total	**6,227.85**
			Net Total	**2,336.79**
			Amortized Construction Emissions	*13.68*
			Operation + Amortized Construction Total	**2,350.47**

Source: Appendix B.
Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.

As shown in Table 14, estimated annual net-generated GHG emissions would be approximately 2,337 MT CO_2e per year as a result of project operation minus the existing baseline. Estimated net annual project-generated operational emissions in 2022 and amortized project construction emissions of approximately 14 MT CO_2e per year would be approximately 2,350 MT CO_2e per year. Net annual operational GHG emissions with amortized construction emissions would not exceed the SCAQMD recommended threshold of 3,000 MT CO_2e per year.

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less-than-Significant Impact. The project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases, as evaluated below.

Consistency with California Air Resources Board's Scoping Plan

The Scoping Plan (approved by CARB in 2008 and updated in 2014 and 2017) provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The Scoping Plan is not directly applicable to specific

projects, nor is it intended to be used for project-level evaluations.[17] Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others.

The Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32 and establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. Table 15 highlights measures that have been, or will be, developed under the Scoping Plan and presents the project's consistency with Scoping Plan measures. The project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law and to the extent that they are applicable to the project.

Table 15. Project Consistency with Scoping Plan Greenhouse Gas Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Project Consistency
Transportation Sector		
Advanced Clean Cars	T-1	*Consistent.* The project's employees would purchase vehicles in compliance with CARB vehicle standards that are in effect at the time of vehicle purchase.
Low Carbon Fuel Standard	T-2	*Consistent.* This is a statewide measure that cannot be implemented by a project applicant or lead agency. Nonetheless, this standard would be applicable to the fuel used by vehicles that would access the project site (i.e., motor vehicles driven by the project's employees would use compliant fuels).
Regional Transportation-Related GHG Targets	T-3	*Not applicable.* The project is not related to developing GHG emission reduction targets. To meet the goals of SB 375, the 2016–2040 RTP/SCS is applicable to the project. The project would not preclude the implementation of this strategy.
Advanced Clean Transit	NA	*Not applicable.* The project would not prevent CARB from implementing this measure.
Last-Mile Delivery	NA	*Not applicable.* The project would not prevent CARB from implementing this measure.
Reduction in VMT	NA	*Not applicable.* The project would not prevent CARB from implementing this measure.
Vehicle Efficiency Measures 1. Tire Pressure 2. Fuel Efficiency Tire Program 3. Low-Friction Oil	T-4	*Consistent.* These standards would be applicable to the light-duty vehicles that would access the project site. Motor vehicles driven by the project's employees would maintain proper tire pressure when their vehicles are serviced. The project's employees would

[17] The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that "[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009).

Table 15. Project Consistency with Scoping Plan Greenhouse Gas Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Project Consistency
4. Solar-Reflective Automotive Paint and Window Glazing		replace tires in compliance with CARB vehicle standards that are in effect at the time of vehicle purchase. Motor vehicles driven by the project's employees would use low-friction oils when their vehicles are serviced. The project's employees would purchase vehicles in compliance with CARB vehicle standards that are in effect at the time of vehicle purchase. In addition, the project would not prevent CARB from implementing this measure.
Ship Electrification at Ports (Shore Power)	T-5	*Not applicable.* The project would not prevent CARB from implementing this measure.
Goods Movement Efficiency Measures 1. Port Drayage Trucks 2. Transport Refrigeration Units Cold Storage Prohibition 3. Cargo Handling Equipment, Anti-Idling, Hybrid, Electrification 4. Goods Movement Systemwide Efficiency Improvements 5. Commercial Harbor Craft Maintenance and Design Efficiency 6. Clean Ships 7. Vessel Speed Reduction	T-6	*Not applicable.* The project would not prevent CARB from implementing this measure.
Heavy-Duty Vehicle GHG Emission Reduction • Tractor-Trailer GHG Regulation • Heavy-Duty Greenhouse Gas Standards for New Vehicle and Engines (Phase I)	T-7	*Consistent.* Heavy-duty vehicles would be required to comply with CARB GHG reduction measures. In addition, the project would not prevent CARB from implementing this measure.
Medium- and Heavy-Duty Vehicle Hybridization Voucher Incentive Project	T-8	*Consistent.* The project medium- and heavy-duty vehicles (e.g., delivery trucks) could take advantage of the vehicle hybridization action, which would reduce GHG emissions through increased fuel efficiency. In addition, the project would not prevent CARB from implementing this measure.
Medium and Heavy-Duty GHG Phase 2	NA	*Not applicable.* The project would not prevent CARB from implementing this measure.
High-Speed Rail	T-9	*Not applicable.* The project would not prevent CARB from implementing this measure.
Electricity and Natural Gas Sector		
Energy Efficiency Measures (Electricity)	E-1	*Consistent.* The project would comply with the current Title 24 Building Energy Efficiency Standards. In addition, the project would not prevent CARB from implementing this measure.

Table 15. Project Consistency with Scoping Plan Greenhouse Gas Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Project Consistency
Energy Efficiency (Natural Gas)	CR-1	*Consistent.* The project would comply with the current Title 24 Building Energy Efficiency Standards. In addition, the project would not prevent CARB from implementing this measure.
Solar Water Heating (California Solar Initiative Thermal Program)	CR-2	*Consistent.* The project is not anticipated to require substantial amounts of hot water to make solar water heating feasible. Nonetheless, the project would include solar water heating if necessitated and feasible.
Combined Heat and Power	E-2	*Not applicable.* The project would not prevent CARB from implementing this measure.
Renewables Portfolio Standard (33% by 2020)	E-3	*Consistent*. The electricity used by the project would benefit from reduced GHG emissions resulting from increased use of renewable energy sources.
Renewables Portfolio Standard (50% by 2050)	NA	*Consistent*. The electricity used by the project would benefit from reduced GHG emissions resulting from increased use of renewable energy sources.
SB 1 Million Solar Roofs (California Solar Initiative, New Solar Home Partnership, Public Utility Programs) and Earlier Solar Programs	E-4	*Not applicable.* The project would not prevent CARB from implementing this measure.
Water Sector		
Water Use Efficiency	W-1	*Not applicable.* The project would not prevent CARB from implementing this measure.
Water Recycling	W-2	*Not applicable.* The project would not prevent CARB from implementing this measure.
Water System Energy Efficiency	W-3	*Not applicable.* This is applicable for the transmission and treatment of water, but it is not applicable for the project. The project would not prevent CARB from implementing this measure.
Reuse Urban Runoff	W-4	*Not applicable.* The project would not prevent CARB from implementing this measure.
Renewable Energy Production	W-5	*Not applicable.* Applicable for wastewater treatment systems. In addition, the project would not prevent CARB from implementing this measure.
Green Buildings		
State Green Building Initiative: Leading the Way with State Buildings (Greening New and Existing State Buildings)	GB-1	*Consistent.* The project would be required to be constructed in compliance with state or local green building standards in effect at the time of building construction.
Green Building Standards Code (Greening New Public Schools, Residential and Commercial Buildings)	GB-1	*Consistent*. The project's buildings would meet green building standards that are in effect at the time of design and construction.

Table 15. Project Consistency with Scoping Plan Greenhouse Gas Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Project Consistency
Beyond Code: Voluntary Programs at the Local Level (Greening New Public Schools, Residential and Commercial Buildings)	GB-1	*Consistent*. The project's buildings would meet green building standards that are in effect at the time of design and construction.
Greening Existing Buildings (Greening Existing Homes and Commercial Buildings)	GB-1	*Consistent.* This is applicable for existing buildings only; it is not applicable for portions of the project except as future standards may become applicable to existing buildings. For project building that would be retrofitted, the buildings would meet current applicable building standards at the time of design and construction.
Industry Sector		
Energy Efficiency and Co-Benefits Audits for Large Industrial Sources	I-1	*Not applicable.* The project would not prevent CARB from implementing this measure.
Oil and Gas Extraction GHG Emission Reduction	I-2	*Not applicable.* The project would not prevent CARB from implementing this measure.
Reduce GHG Emissions by 20% in Oil Refinery Sector	NA	*Not applicable.* The project would not prevent CARB from implementing this measure.
GHG Emissions Reduction from Natural Gas Transmission and Distribution	I-3	*Not applicable.* The project would not prevent CARB from implementing this measure.
Refinery Flare Recovery Process Improvements	I-4	*Not applicable.* The project would not prevent CARB from implementing this measure.
Work with the Local Air Districts to Evaluate Amendments to Their Existing Leak Detection and Repair Rules for Industrial Facilities to Include Methane Leaks	I-5	*Not applicable.* The project would not prevent CARB from implementing this measure.
Recycling and Waste Management Sector		
Landfill Methane Control Measure	RW-1	*Not applicable.* The project would not prevent CARB from implementing this measure.
Increasing the Efficiency of Landfill Methane Capture	RW-2	*Not applicable.* The project would not prevent CARB from implementing this measure.
Mandatory Commercial Recycling	RW-3	*Consistent.* During both construction and operation of the project, the project would comply with all state regulations related to solid waste generation, storage, and disposal, including the California Integrated Waste Management Act, as amended.
Increase Production and Markets for Compost and Other Organics	RW-3	*Not applicable.* The project would not prevent CARB from implementing this measure.
Anaerobic/Aerobic Digestion	RW-3	*Not applicable.* The project would not prevent CARB from implementing this measure.
Extended Producer Responsibility	RW-3	*Not applicable.* The project would not prevent CARB from implementing this measure.

Table 15. Project Consistency with Scoping Plan Greenhouse Gas Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Project Consistency
Environmentally Preferable Purchasing	RW-3	*Not applicable.* The project would not prevent CARB from implementing this measure.
Forests Sector		
Sustainable Forest Target	F-1	*Not applicable.* The project would not prevent CARB from implementing this measure.
High GWP Gases Sector		
Motor Vehicle Air Conditioning Systems: Reduction of Refrigerant Emissions from Non-Professional Servicing	H-1	*Consistent.* The project's employees would be prohibited from performing air conditioning repairs and would be required to use professional servicing.
SF_6 Limits in Non-Utility and Non-Semiconductor Applications	H-2	*Not applicable.* The project would not prevent CARB from implementing this measure.
Reduction of Perfluorocarbons (PFCs) in Semiconductor Manufacturing	H-3	*Not applicable.* The project would not prevent CARB from implementing this measure.
Limit High GWP Use in Consumer Products	H-4	*Consistent*. The project's employees would use consumer products that would comply with the regulations that are in effect at the time of manufacture.
Air Conditioning Refrigerant Leak Test During Vehicle Smog Check	H-5	*Consistent*. Motor vehicles driven by the project's employees would comply with the leak test requirements during smog checks.
Stationary Equipment Refrigerant Management Program – Refrigerant Tracking/Reporting/Repair Program	H-6	*Not applicable.* The project would not prevent CARB from implementing this measure.
Stationary Equipment Refrigerant Management Program – Specifications for Commercial and Industrial Refrigeration	H-6	*Not applicable.* The project would not prevent CARB from implementing this measure.
SF_6 Leak Reduction Gas Insulated Switchgear	H-6	*Not applicable.* The project would not prevent CARB from implementing this measure.
40% Reduction in Methane and Hydrofluorocarbon (HFC) Emissions	NA	*Not applicable.* The project would not prevent CARB from implementing this measure.
50% Reduction in Black Carbon Emissions	NA	*Not applicable.* The project would not prevent CARB from implementing this measure.
Agriculture Sector		
Methane Capture at Large Dairies	A-1	*Not applicable.* The project would not prevent CARB from implementing this measure.

Notes: CARB = California Air Resources Board; GHG = greenhouse gas; SB = Senate Bill; RTP = Regional Transportation Plan; SCS = Sustainable Communities Strategy; VMT = vehicle miles traveled; NA = not applicable; SF_6 = sulfur hexafluoride; GWP = global warming potential.

Consistency with SCAG Connect SoCal

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the Connect SoCal Plan, the 2020-2045 RTP/SCS. Connect SoCal is a long-range visioning plan

that balances future mobility and housing needs with economic, environmental, and public health goals. Connect SoCal charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, planning strategies, and the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura.

Because the project is not growth inducing, this type of consistency analysis does not apply. However, the major goals of the Connect SoCal are outlined in Table 16, along with the project's consistency with them.

Table 16. Project Consistency with the SCAG Connect SoCal RTP/SCS

RTP/SCS Measure	Proposed Project Consistency
Encourage regional economic prosperity and global competitiveness.	*Not applicable.* The project would not inhibit SCAG from encouraging regional economic prosperity and global competitiveness.
Improve mobility, accessibility, reliability, and travel safety for people and goods.	*Not applicable.* The project would not inhibit SCAG from strengthening the regional transportation network for goods movement.
Enhance the preservation, security, and resilience of the regional transportation system.	*Not applicable.* The project would not inhibit SCAG from enhancing the resilience of the regional transportation system.
Increase person and goods movement and travel choices within the transportation system.	*Not applicable.* The project would not inhibit SCAG from increasing person and goods movement and travel choices within the transportation system.
Reduce greenhouse gas emissions and improve air quality.	*Consistent.* The project would result in criteria air pollutant and GHG emissions during construction and operation. However, the project would not exceed the SCAQMD mass daily significance thresholds during construction and operation.
Support healthy and equitable communities.	*Not applicable.* The project would not inhibit SCAG from supporting healthy and equitable communities.
Adapt to a changing climate and support an integrated regional development pattern and transportation network.	*Not applicable.* The project would not inhibit SCAG from adapting to a changing climate and support an integrated regional development pattern and transportation network.
Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	*Not applicable.* The project would not inhibit SCAG from leveraging technology for the transportation system.
Encourage development of diverse housing types in areas that are supported by multiple transportation options.	*Not applicable.* The project does not include housing and would not inhibit SCAG from encouraging development of diverse housing types.
Promote conservation of natural and agricultural lands and restoration of habitats.	*No conflict.* The project would not impact natural lands during construction or operation.

Source: SCAG 2020.

As shown in Table 16, the project would be consistent with all applicable measures in the SCAG Connect SoCal RTP/SCS.

Consistency with Executive Order S-3-05 and Senate Bill 32

- **EO S-3-05.** This EO establishes the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050.
- **SB 32.** This bill establishes for a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by December 31, 2030.

This section evaluates whether the GHG emissions trajectory after project completion would impede the attainment of the 2030 and 2050 GHG reduction goals identified in EO B-30-15 and EO S-3-05.

To begin, CARB has expressed optimism with regard to both the 2030 and 2050 goals. It states in the First Update to the Climate Change Scoping Plan that "California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32" (CARB 2014, p. ES2). With regard to the 2050 target for reducing GHG emissions to 80% below 1990 levels, the First Update to the Climate Change Scoping Plan states the following (CARB 2014, p. 34):

> This level of reduction is achievable in California. In fact, if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under AB 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80% below 1990 levels by 2050. Additional measures, including locally driven measures and those necessary to meet federal air quality standards in 2032, could lead to even greater emission reductions.

In other words, CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, EO B-30-15, and EO S-3-05. This is confirmed in the 2017 Scoping Plan, which states (CARB 2017):

> The Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while identifying new, technologically feasible and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities.

The project would not interfere with implementation of any of the above-described GHG reduction goals for 2030 or 2050 because the project would not exceed the SCAQMD's draft interim threshold of 3,000 MT CO_2e per year (SCAQMD 2010). This threshold was established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. Because the project would not exceed the threshold, this analysis provides support for the conclusion that the project would not impede the state's trajectory toward the above-described statewide GHG reduction goals for 2030 or 2050. In addition, the project would comply with laws and regulations that would reduce GHG emissions

Furthermore, the project would not conflict with the state's trajectory toward future GHG reductions. In addition, since the specific path to compliance for the state in regards to the long-term goals will likely require development of technology or other changes that are not currently known or available, specific additional mitigation measures for the project would be speculative and cannot be identified at this time. The project's consistency would assist in meeting the City's contribution to GHG emission reduction targets in California. With respect to future GHG targets under SB 32 and EO S-3-05, CARB has also made clear its legal interpretation that it has the requisite authority to adopt whatever regulations are necessary, beyond the AB 32 horizon year of 2020, to meet SB 32's 40% reduction target by 2030 and EO S-3-05's 80% reduction target by 2050; this legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the state on its trajectory toward meeting these future GHG targets.

Based on the above considerations, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and no mitigation is required. This impact would be less than significant.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
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 that 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?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Short-Term Construction Impacts

Less-Than-Significant Impact. The project would include the demolition of an existing, 74,662-square-foot industrial building and construction of an approximately 44,162-square-foot industrial building. During construction of the project, potentially hazardous materials would likely be handled on the project site. These materials would include gasoline, diesel fuel, lubricants, and other petroleum-based products required to operate and maintain construction equipment. Handling of these potentially hazardous materials would be temporary and would coincide with the short-term construction phase of the project.

Although these materials would likely be stored on the project site, storage would be required to comply with the guidelines set forth by each product's manufacturer and with all applicable federal, state, and local regulations pertaining to the storage of hazardous materials. Consistent with federal, state, and local requirements, the transport of hazardous materials to and from the project site would be conducted by a licensed contractor. Any handling, transport, use, or disposal of hazardous materials would comply with all relevant federal, state, and local agencies and regulations, including the EPA, the California Department of Toxic Substances Control (DTSC), the California Occupational Safety and Health Administration, Caltrans, the Resource Conservation and Recovery Act, SCAQMD, and the Los Angeles County Certified Unified Program Agency. Therefore, short-term construction impacts related to the transport, use, or disposal of hazardous materials would be less than significant.

Long-Term Operational Impacts

Less-than-Significant Impact with Mitigation Incorporated. Potentially hazardous materials associated with project operations would include materials used during typical cleaning and maintenance activities.

Although these potentially hazardous materials would vary, they would generally include household cleaning products, paints, fertilizers, and herbicides and pesticides. Many of these materials are considered household hazardous wastes, common wastes, and/or universal wastes by the EPA, which considers these types of wastes to be common to businesses and households and to pose a lower risk to people and the environment than other hazardous wastes when properly handled, transported, used, and disposed of (EPA 2020). Federal, state, and local regulations typically allow these types of wastes to be handled and disposed of with less stringent standards than other hazardous wastes, and many of these wastes do not have to be managed as hazardous waste.

In addition, any potentially hazardous material handled on the project site would be limited in both quantity and concentrations, consistent with other similar industrial uses located in the City, and any handling, transport, use, and disposal would comply with applicable federal, state, and local agencies and regulations. Furthermore, as mandated by the U.S. Occupational Safety and Health Administration (OSHA; OSHA n.d.), all hazardous materials stored on the project site would be accompanied by a Material Safety Data Sheet, which would inform employees and first responders as to the necessary remediation procedures in the case of accidental release.

Due to the age of the on-site buildings and structures, it is likely that asbestos-containing materials (ACM) and lead-based paints, as well as other building materials containing lead (e.g., ceramic tile), were used in their construction. Demolition of these building and structures can cause encapsulated ACM (if present) to become friable and, once airborne, would be considered a carcinogen.[18] A carcinogen is a substance that causes cancer or helps cancer grow. Demolition of the existing buildings and structures can also cause the release of lead into the air if not properly removed and handled. The EPA has classified lead and inorganic lead compounds as "probable human carcinogens" (EPA 2020). Such releases could pose significant risks to persons living and working in and around the project area, as well as to project construction workers.

Abatement of all ACM and lead-based paints encountered during any future building demolition activities would be required to be conducted in accordance with all applicable laws and regulations, including those of the EPA (which regulates disposal), OSHA, U.S. Department of Housing and Urban Development, Cal/OSHA (which regulates employee exposure), and SCAQMD.

For example, the EPA requires that all asbestos work performed within regulated areas be supervised by a person who is trained as an asbestos supervisor (EPA Asbestos Hazard Emergency Response Act, 40 CFR 763). SCAQMD's Rule 1403 requires that buildings undergoing demolition or renovation be surveyed for ACM prior to any demolition or renovation activities. Should ACM be identified, Rule 1403 requires that ACM be safely removed and disposed of at a regulated disposal site, if possible. If it is not possible to safely remove ACM, Rule 1403 requires that safe procedures be used to demolish the building with asbestos in place without resulting in a significant release of asbestos to the environment. Additionally, during demolition, grading, and excavation, all construction workers would be required to comply with the requirements of Title 8 of the California Code of Regulations, Section 1529 (Asbestos), which provides for exposure limits, exposure monitoring, respiratory protection, and good working practices by workers exposed to asbestos.

[18] When dry, an ACM is considered friable if it can be crumbled, pulverized, or reduced to powder by hand pressure. If it cannot, it is considered non-friable ACM. It is possible for non-friable ACM to become friable when subjected to unusual conditions, such as demolishing a building or removing an ACM that has been glued into place.

Cal/OSHA Regulation 29 (CFR Standard 1926.62) regulates the demolition, renovation, or construction of buildings involving lead-based materials. It includes requirements for the safe removal and disposal of lead, and the safe demolition of buildings containing lead-based paints or other lead materials. Additionally, during demolition, grading, and excavation, all construction workers would be required to comply with the requirements of Title 8 of the California Code of Regulations, Section 1532.1 (Lead), which provides for exposure limits, exposure monitoring, respiratory protection, and good working practice by workers exposed to lead.

A Phase I Environmental Site Assessment (ESA) was prepared for the project site (Appendix E). The Phase I ESA was performed in general conformance with the scope and limitations as detailed in the ASTM Practice E1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process. The Phase I ESA is designed to provide the project applicant with an assessment concerning the environmental conditions (limited to the issues identified within the ESA) as they exist at the project site.

Recognized Environmental Condition. A recognized environmental condition refers to the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property, due to release to the environment, under conditions indicative of a release to the environment, or under conditions that pose a material threat of a future release to the environment.

All or part of the project site has been occupied by a custom rubber products manufacturer since initial construction in 1951, utilizing raw materials including polymers, talc, neoprene, carbon black, monomers, and zinc as well as petroleum hydrocarbons such as lubricating oils, waste lubricating oil, and the process oils. Process oils are currently stored in three interior aboveground storage tanks (ASTs) (two 3,000-gallon ASTs and one 4,000-gallon AST) within the manufacturing area. In addition, the manufacturing area includes an internal hydraulic system comprised of a network of below-grade trenches and overhead piping that deliver a recirculated water and hydraulic oil mixture to the rubber presses and molding machines.

Furthermore, a central clarifier is present that is used primarily for boiler blowdown and cooling tower discharges. The project site also operates a small electrical substation that includes one large pad-mounted transformer and additional electrical equipment situated within a chain link fence within the central courtyard, with apparent associated equipment on the interior adjacent wall. The transformer was not labeled indicating polychlorinated biphenyls content. The electrical equipment is not original and has been replaced at least once or twice. No staining or leakage was observed in the vicinity of the transformer equipment.

Historical Recognized Environmental Condition. A historical recognized environmental condition (HREC) refers to a past release of any hazardous substances or petroleum products that has occurred in connection with the project site and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the project site to any required controls.

A total of four steel underground storage tanks (USTs) were formerly operated at the project site, three of which contained diesel to fuel the two boilers associated with rubber molding, and one of which contained naphthene cutting oil. Three of the USTs (tanks 1, 2, and 3) were located along the exterior south side of the project site and were removed in 1989. A fourth UST (tank 4 containing diesel) was abandoned in place in the central courtyard area in or around 1989. During the removal of tanks 1 through 3, soil samples from

beneath the tanks were tested and a release was detected; therefore, additional site investigation, excavation, and remediation work was performed in this area under the oversight of the Los Angeles County Department of Public Works. Subsequently, a No Further Action (NFA) letter was issued for Closure Permit Number 5999B by the Los Angeles County Department of Public Works, Waste Management Division (currently Environmental Programs Division) dated August 6, 1992, which pertains to the three exterior removed USTs. The abandoned-in-place UST was assigned a separate Closure Permit Number of 6000B, which was not listed on the NFA letter. However, based on preliminary conversations with Los Angeles County Department of Public Works staff, this appears to be an error in which tank 4 should have been noted, as all four USTs appear to have been closed under this NFA letter.

As summarized above and further discussed in the Phase I ESA, the findings revealed evidence of an HREC and environmental issues in connection with the project site. The Phase I ESA made a series of recommendations that the project would need to adhere to through implementation of MM-HAZ-1. Therefore, with incorporation of mitigation, long-term operational impacts associated with the use, transport, and disposal of hazardous materials would be less than significant.

MM-HAZ-1 Based on the recommendations made in the Phase I ESA prepared by Partner Engineering, the following shall occur prior to the issuance of building permits for the proposed on-site buildings and structures:

1. A limited subsurface investigation shall be conducted in order to determine the presence or absence of soil and/or soil vapor contamination due to the current and historical use of the project site.
2. A Soil Management Plan should be prepared to appropriately handle the known oil releases at the project site and any unknown releases associated with the current and former industrial use.
3. The No Further Action letter dated August 6, 1992, pertaining to the historical underground storage tanks (USTs) at the project site should be revised to clearly include Closure Permit Number 6000B for the abandoned-in-place UST to avoid confusion in the future as to whether it was officially closed.
4. An asbestos survey conducted in 1990 identified asbestos in the existing building on the project site. It is not known if the survey was conducted for all equipment and building materials at the time; therefore, an asbestos survey should be performed and known asbestos-containing materials (ACMs) should be abated or removed for safety purposes (or an operations and maintenance program should be implemented in order to safely manage the known and suspect ACMs located at the project site).

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less-than-Significant Impact with Mitigation Incorporated: Refer to response provided in Section 3.9(a).

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The nearest school to the project site is Al Gauldin Elementary School (9724 Spry Street), located approximately 0.3 miles southwest of the project site. In addition, the project would not emit hazardous air emissions or handle hazardous or acutely hazardous materials. Therefore, no impacts associated with emitting hazardous emissions or handling hazardous or acutely hazardous materials within 0.25 miles of school would occur.

d) Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less-than-Significant Impact with Mitigation Incorporated. California Government Code Section 65962.5 requires the California Environmental Protection Agency to compile a list of hazardous waste and substances sites (Cortese List). While the Cortese List is no longer maintained as a single list, the following databases provide information that meets the Cortese List requirements (refer to Appendix E):

- List of Hazardous Waste and Substances sites from DTSC EnviroStor database (DTSC 2020; Health and Safety Codes 25220, 25242, 25356, and 116395)
- List of Open, Active Leaking Underground Storage Tank Sites by County and Fiscal Year from the State Water Resources Control Board GeoTracker database (SWRCB 2020; Health and Safety Code 25295)
- List of solid waste disposal sites identified by the State Water Resources Control Board with waste constituents above hazardous waste levels outside the waste management unit (Water Code Section 13273[e]; 14 CCR 18051)
- List of "active" Cease and Desist Orders and Cleanup and Abatement Orders from the State Water Resources Control Board (Water Code Sections 13301 and 13304)
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC

As summarized above and further discussed in the Phase I ESA, the findings revealed evidence of an HREC and environmental issues in connection with the project site. A total of four steel USTs were formerly operated at the project site, three of which contained diesel to fuel the two boilers associated with rubber molding, and one of which contained naphthene cutting oil. During the removal of tanks 1 through 3, soil samples from beneath the tanks were tested and a release was detected; therefore, additional site investigation, excavation, and remediation work was performed in this area under the oversight of the Los Angeles County Department of Public Works. Subsequently, an NFA letter was issued for Closure Permit Number 5999B by the Los Angeles County Department of Public Works, Waste Management Division (currently Environmental Programs Division) dated August 6, 1992, which pertains to the three exterior removed USTs. As a result, the project site appears on the LUST [leaking underground storage tank] Cleanup Site database maintained by the Regional Water Quality Control Board (RWQCB).

The Phase I ESA made a series of recommendations that the project would need to adhere to through implementation of MM-HAZ-1. Therefore, with incorporation of mitigation, impacts associated with the

project being located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would be less than significant.

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?

Less-than-Significant Impact. The project site is not located within an airport land use plan. The closest airport to the project site is Compton/Woodley Airport, located approximately 7.2 miles southwest of the site. Therefore, impacts associated with a safety hazard or excessive noise for people residing or working in the project area would be less than significant.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less-than-Significant Impact. There are various plans at the federal, state, and local level dealing with responses to disasters and emergencies. Local emergency plans are considered extensions of the California Emergency Plan, published by the State Office of Emergency Services, which provides for authorities and responsibilities in the event of formal proclamation of emergencies. The Los Angeles County of Disaster Preparedness is responsible for coordinating the various federal, state, local, quasi-local, and private agencies involved in disaster and emergency response.

Local agencies, such as Downey, are responsible for responding to disasters and emergencies within their borders. According the City's General Plan, Safety Element, the City has an emergency operation plan, consistent with the Standards Emergency Management System – Emergency Operations Plan. During an emergency, the City would implement the Emergency Operations Plan, which includes setting up the Emergency Operation Center. In a disaster, the Emergency Operation Center would become the command post for coordinating manpower, equipment, resources and facilities. Using the communications network, the disaster coordinator would be able to assemble information in the field, assess the situation throughout the City, keep the general public informed at all times and determine proper channels to successfully allocate available resources and disaster services (City of Downey 2005).

During emergencies, Rio Hondo Golf Course and Apollo Park are designated as casualty collection points. When activated, these locations would be utilized by the county to air-evacuate the injured to medical facilities. In the event that evacuation of parts of the City are necessary, the Downey Police Department (DPD) would coordinate evacuation procedures based on possible evacuation routes (City of Downey 2005). Therefore, impacts associated with impairing of physically interfering with an adopted emergency response plan or emergency evacuation plan would be less than significant.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Less-than-Significant Impact. According to California Department of Forestry and Fire Services' (CAL FIRE'S) Fire Hazard Severity Zone Map, the project site is not located in an area identified as being susceptible to wildland fire (CAL FIRE 2007). Furthermore, the project site is surrounded by existing development in an

urbanized portion of the City away from any urban-wildland interface. Therefore, no impacts associated with wildland fire hazards would occur.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
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:				
i) result in substantial erosion or siltation on or off site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

The following analysis is based, in part, on the site-specific Low-Impact Development Plan (LID Plan) (Appendix F-1) and the Preliminary Hydrology Calculations Report (Appendix F-2), both prepared by Thienes Engineering in July 2019.

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Surface Water Quality

Less-than-Significant Impact: Construction of the project would include earthwork activities that could potentially result in erosion and sedimentation, which could subsequently degrade downstream receiving waters and violate water quality standards. Stormwater runoff during the construction phase may contain silt and debris, resulting in a short-term increase in the sediment load of the municipal storm drain system. Substances such as oils, fuels, paints, and solvents may be inadvertently spilled on the project site and subsequently conveyed via stormwater to nearby drainages, watersheds, and groundwater. To reduce the potential for downstream water quality impacts, the project would comply with Municipal Code, Section 8024 (City of Downey 2020), which states that dust, water, mud, materials of construction, or debris shall be contained on the building site. The project site is larger than 1 acre and would be subject to NPDES Construction General Permit issued by the Los Angeles RWQCB. The permit requires the implementation of stormwater controls and development of a stormwater pollution prevention plan to minimize the amount of sediment and other pollutants from being discharged in stormwater runoff during construction, as well as various temporary BMPs designed to prevent erosion and siltation, as well as the off-site conveyance of various on-site constituents. Therefore, short-term construction impacts associated with water quality standards would be less than significant.

Once operational, the project site would be developed with an approximately 44,162-square-foot industrial building, and paved parking spaces and drive aisles. Collectively, these on-site areas would reduce the potential for soils erosion and topsoil loss that could affect surface water quality. The project would be subject to the requirements of the NPDES Municipal Separate Storm Sewer Systems (MS4) permit, which regulates municipal discharges of stormwater and non-stormwater. Additionally, the project would include a LID Plan (Appendix F-1) to comply with City efforts to retain stormwater runoff generating from new construction projects. The project site must meet the requirements of the LID Standards Manual, which would help to mitigate potential impacts to water quality.

The project site would be graded so that stormwater collected via the building's roof and parking areas would be collected by concrete catchbasins and conveyed via underground pipes to an underground stormwater detention chamber and proprietary biofiltration system (Figure 13, Proposed Storm Drain System). The biofiltration system would utilize plants and soil media to treat stormwater before ultimately being discharged into the adjacent existing 36-inch public storm drain system within Washburn Road via an underdrain system and sump pump. Therefore, impacts associated with water quality standards would be less than significant.

Groundwater Quality

Less-than-Significant Impact: Similar to surface water quality, groundwater quality would be protected during project construction through BMPs required by the NPDES permit. BMPs would include spill prevention and cleanup guidelines, dewatering operations guidelines, and stormwater runoff prevention. These BMPs would protect the groundwater from contamination by construction activities.

Under existing conditions, the project site is entirely impervious surfaces. However, upon completion of construction, the project site would include 0.66 acres of pervious surfaces. The pervious surface area would be located along the landscaping fronting Woodruff Avenue. Runoff from portions of the driveways and landscaping would sheet flow to the public street without being routed to a LID BMP. However, stormwater collected via the building's roof and parking areas would be collected by concrete catchbasins and conveyed via underground pipes to an underground stormwater detention chamber and proprietary biofiltration system (Figure 13, Proposed Storm Drain System). The biofiltration system would utilize plants and soil media to treat stormwater before ultimately being discharged via an underdrain system and sump pump into the adjacent existing 36-inch public storm drain system within Washburn Road. Therefore, impacts associated with groundwater quality would be less than significant.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Groundwater Supplies

Less-than-Significant Impact: The City produces groundwater from the Central Basin. The Central Basin is located in Los Angeles County, approximately 20 miles southeast of downtown Los Angeles. Groundwater in the Central Basin provides a substantial portion of the water supply needed by residents and industries in the overlying area.

In the Central Basin Judgment of 1965 (Central Basin Judgment), the Superior Court fixed allowable withdrawals from the Central Basin at a level that was greater than the amount of water returned to the Central Basin through natural replenishment. The City was one of the original parties involved in the Central Basin Judgment and has acquired additional water rights since that time, resulting in an Allowed Pumping Allocation (APA) of 16,554 acre-feet per year (AFY). The City owns wells, twenty of which are currently operational and have a combined pumping capacity of approximately 27,575 gallons per minute, or approximately 44,500 AFY if operated continuously (City of Downey 2018).

In December 2013, the Supreme Court approved amendments to the Central Basin Judgment, which implemented a water storage program. The Amended Central Basin Judgment states that a party may store up to 50% of the party's APA in an Individual Storage Account and 150 percent of the party's APA in a Community Storage Account if space is available. In addition, the amendments allow parties to convert unused APA to stored water and revised the amount of carryover to be equal to 60% of the party's APA minus the amount of carryover water set aside for storage. The purpose of the storage program creates an added reliability in water supply from the Central Basin. In addition, the amendments allow for transfer of water between Central Basin and West Basin by permitting parties with water rights in Central Basin to increase production in Central Basin, while another party decreases production in West Basin by the corresponding amount. Under the Central Basin Judgment, water rights are fixed and do not vary year to year. Water producers cannot exceed their water rights by more than 20% or 20 acre-feet, whichever is greater, in any year and an adjustment is made the following year (City of Downey 2018).

Furthermore, as a water purveyor, the City must be able to provide for the minimum health and safety water requirements of the community at all times. Following the adoption of its Water Shortage Contingency Plan, Ordinance No. 925, the City developed a four-stage water-rationing plan to be implemented during declared water shortages. The four-stage water-rationing plan includes both voluntary and mandatory rationing,

which are to be implemented depending on the causes, severity, and anticipated duration of the water supply shortage. The four-stage water-rationing plan is designed to allow for a minimum of 50% of the City's normal supply to be available during a severe or extended water shortage. Rationing program triggering levels were established to ensure that this goal is met. Rationing stages are triggered by a supply shortage due to drought conditions, contamination of one or a combination of sources, or some other type of emergency (City of Downey 2018).

The City's 2015 Urban Water Management Plan provides multiple-dry-year supply and demand analysis for the City's domestic water service area. As shown in Table 17, the City's supplies can meet demands during multiple dry years for the next 20 years. Therefore, impacts associated with groundwater supplies would be less than significant.

Table 17. Supply and Demand Comparison – Multiple-Dry-Year Events

Scenarios	Supply and Demand	2020	2025	2030	2035	2040
Multiple-dry-year first-year supply	Supply totals	17,218	17,876	18,180	18,489	18,804
	Demand totals	17, 218	17,876	18,180	18,489	18,804
	Difference	0	0	0	0	0
Multiple-dry-year second-year supply	Supply totals	17,592	18,264	18,575	18,891	19,213
	Demand totals	17,592	18,264	18,575	18,891	19,213
	Difference	0	0	0	0	0
Multiple-dry-year third-year supply	Supply totals	17,592	18,264	18,575	18,891	19,213
	Demand totals	17,592	18,264	18,575	18,891	19,213
	Difference	0	0	0	0	0

Source: City of Downey 2018.

Groundwater Recharge

Less-than-Significant Impact: The project site overlies the boundaries of the Central Basin, which is subject to the Amended Central Basin Judgment. The Water Replenishment District of Southern California, acting as the watermaster for the Central Basin, is responsible for managing groundwater resources in this area. Under existing conditions, the 6.31-acre project site is developed and comprised entirely of impervious surfaces. Given these existing conditions and the project site's small size of 6.31 acres in relationship to the size of the Central Basin, the project site does not currently serve as a significant location for dedicated groundwater recharge.

Upon completion of construction, the project would introduce 0.66 acres of pervious surfaces to the project site as landscaping fronting Woodruff Avenue, which could potentially contribute to groundwater recharge. As such, given that the project site does not currently serve as a significant location for groundwater recharge and the project would introduce new pervious areas on site that could promote groundwater recharge, the project is not expected to directly cause a decrease in groundwater supplies or interfere substantially with groundwater recharge, and impacts are determined to be less than significant.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) result in substantial erosion or siltation on or off site;

Less-than-Significant Impact: There are no streams or rivers located on or near the project site. Project construction would involve some earth-disturbing activities, including grading, that could expose on-site soils to erosion and surface water runoff. However, inclusion of project BMPs would reduce erosion and siltation from the project site occurring from construction activities. In addition, the project site is located within a developed area, with industrial land uses surrounding the project site; as such, the development of the project would not cause a significant change to surface bodies of water in a manner that could cause siltation or erosion. Therefore, impacts associated with altering of the existing drainage patterns and erosion would be less than significant.

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;

Less-than-Significant Impact: As discussed in Section 3.10(b), the project would increase the amount of pervious surfaces on the project site by adding landscaped area. However, the majority of the project site would remain impervious surface. Pursuant to Municipal Code Section 5707, the project has prepared a LID plan to comply with City efforts to retain stormwater runoff generating from new construction projects. As described in the project's LID plan, stormwater collected via the building's roof and parking areas would be collected by concrete catchbasins and conveyed via underground pipes to an underground stormwater detention chamber and proprietary biofiltration system (Figure 13, Proposed Storm Drain System). The biofiltration system would utilize plants and soil media to treat stormwater before ultimately being discharged via an underdrain system and sump pump into the adjacent existing 36-inch public storm drain system within Washburn Road. Additionally, the Preliminary Hydraulics Calculations report analyzed hydraulic conditions in the event of a 50-year peak storm event (per Los Angeles County Department of Public Works Requirements) and determined that the project's proposed drainage patterns would not result in impacts to downstream facilities (Appendix F-2). Furthermore, the project would comply with existing local, state, and federal regulations related to drainage and runoff. Therefore, the project would not result in flooding on or off site. Therefore, impacts associated with altering the existing drainage pattern and flooding would be less than significant.

iii) 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; or

Less-than-Significant Impact: As described in the project's LID plan, stormwater collected via the building's roof and parking areas would be collected by concrete catchbasins and conveyed via underground pipes to an underground stormwater detention chamber and proprietary biofiltration system (Figure 13, Proposed Storm Drain System). The biofiltration system would utilize plants and soil media to treat stormwater before ultimately being discharged into the adjacent existing 36-inch public storm drain system within Washburn Road via an underdrain system and sump pump. Additionally, the Preliminary Hydraulics Calculations report analyzed hydraulic conditions in the

event of a 50-year peak storm event (per Los Angeles County Department of Public Works Requirements) and determined that the project's proposed drainage patterns would not result in impacts to downstream facilities (Appendix F-2). Furthermore, the project would comply with existing local, state, and federal regulations related to drainage and runoff. Furthermore, runoff from public streets would be collected into existing gutters along Woodruff Avenue. Therefore, impacts associated with stormwater drainage system capacity would be less than significant.

iv) impede or redirect flood flows?

No Impact: The project site does not contain any streams or rivers having the potential to be altered by the project. The project site has been previously graded and is located within a highly urbanized area. According to the City's General Plan, the City had been subject to periodic flooding and flood insurance requirement imposed by the Federal Emergency Management Agency (FEMA) until the U.S. Army Corps of Engineers constructed improvements in 2000. These improvements included raising levees adjacent to Rio Hondo River. As such, no properties within the City are considered by FEMA to be within a 100-year flood zone (FEMA 2020). A 100-year flood zone is one of such intensity that it has a 1% chance of occurring in any given year. However, according to FEMA, the City is located within a 500-year flood zone, which has a 0.2% chance of a flood occurring in any given year. Therefore, impacts associated with impeding or redirecting flood flows would not occur.

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

No Impact: Due to the lack of an adjacent lake or other water body, the project site would not be susceptible to seiche. Additionally, because of the site's inland location, the project would not be subject to tsunami. As addressed in Section 3.10(c)(iv), the City had been subject to periodic flooding and flood insurance requirement imposed by FEMA until the U.S. Army Corps of Engineers constructed improvements in 2000. These improvements included raising levees adjacent to Rio Hondo River. As such, no properties within the City are considered by FEMA to be within a 100-year flood zone. Therefore, no impacts associated with flood hazards, tsunami, or seiche would occur.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less-than-Significant Impact. Refer to responses provided in Sections 3.10(a) and 3.10(b).

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING – Would the project:				
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?	☐	☐	☒	☐

a) Would the project physically divide an established community?

No Impact. The physical division of an established community typically refers to the construction of a linear feature (e.g., a major highway or railroad tracks) or removal of a means of access (e.g., a local road or bridge) that would impair mobility within an existing community or between a community and outlying area.

Under the existing conditions, the project site is entirely developed and is the current location for KMC, which manufactures rubber products. As such, the project is not used as a connection between established communities. Instead connectivity within the area surrounding the project site is facilitated via local roadways. As such, the project would not impede movement within an established community, or from one established community to another. Therefore, no impacts associated with physically dividing an established community would occur.

b) Would the project 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?

Less-than-Significant Impact. The project would consist of demolishing an existing industrial building and constructing a new industrial building for truck terminal use. As shown in Table 18, the project would adhere to policies set forth in the City's General Plan to avoid and/or mitigate potential environmental impacts.

Table 18. Policy Consistency Analysis

Land Use Element Policy Number	Land Use Element Policy	Project-Applicable Component(s)	Consistency Finding
Land Use Element			
Policy 1.1.1	Maintain a balance of uses	Residential uses occupy more than half of the City's land area. However, the City also provides a mix of other land uses such as open space, commercial, and	The project would be consistent with this policy.

Table 18. Policy Consistency Analysis

Land Use Element Policy Number	Land Use Element Policy	Project-Applicable Component(s)	Consistency Finding
		manufacturing. The project includes demolition of an existing industrial building and construction of an industrial tilt-up building for truck terminal use. Therefore, because the project would not include residential uses, which is the primary land use in the City, and would maintain an industrial use, the project would continue to provide the City with a mix of uses.	
Policy 1.1.3	Provide an appropriate amount of land area for business and employment.	Under existing conditions, the project site currently contains an industrial building for a rubber manufacturing company. The project would include the demolition of the aforementioned industrial building and construction of an industrial tilt-up building for truck terminal use. The principal purpose of the project is for transferring goods and breaking down and assembling tractor-trailer transportation. The project would generate approximately 15 to 30 jobs. Therefore, the project would contribute to business and employment in the City.	The project would be consistent with this policy.
Circulation Element			
Policy 2.1.1 and Program 2.1.1.1	Maintain a street system that provides safe and efficient movement of people and goods. Maintain intersections and street segments at acceptable service levels and not worsen those intersections and street segments currently operating at unacceptable levels.	A TIA (Appendix C) was prepared for the project to assess the project's potential effects on the City's circulation system. As determined in the TIA, the project would not result in conflicts with Policy 2.1.1 or Program 2.1.1.1.	The project would be consistent with this policy.
Policy 2.3.1	Promote the safe and efficient movement of truck traffic through the City.	The project site is located on Woodruff Avenue, a City-designated truck route that provides access to other City- designated truck routes and regional highways. The project's location and proximity to these routes would allow for trucks accessing the project site to efficiently and safely navigate throughout the City.	The project would be consistent with this policy.

Table 18. Policy Consistency Analysis

Land Use Element Policy Number	Land Use Element Policy	Project-Applicable Component(s)	Consistency Finding
Policy 2.3,2	Minimize negative impacts associated with truck traffic.	The project site's location along City-designated truck routes would minimize negative impacts associated with truck traffic on other land uses throughout the City, given that truck traffic would be constrained to designated truck routes. Additionally, a TIA (Appendix C) was prepared for the project to assess the project's traffic effects and their consistency with City LOS standards. The TIA concluded that the project would not be inconsistent with the LOS standards established by the City.	The project would be consistent with this policy.
Policy 2.3.3	Discourage land uses that attract high amounts of truck traffic.	The project would include the demolition of an existing industrial building and construction of an industrial tilt-up building for truck terminal use. While the project would result in an increase in truck traffic accessing the site (see Section 3.17, Transportation), the project would be located on a parcel that has been designated by the City's General Plan for industrial uses and zoned for industrial uses. Moreover, this policy is a policy that is implemented at the City level, and implementation of the project would not inhibit the City from discouraging the development of land uses that attract high amounts of truck traffic on sites that do not already attract truck traffic elsewhere throughout the City.	The project would be consistent with this policy.
Conservation			
Policy 4.3.1	Reduce the contaminant level of stormwater and urban runoff generated within Downey.	To reduce the potential for downstream water quality impacts, the project would comply with Municipal Code, Section 8024 (City of Downey 2020), which states that dust, water, mud, materials of construction, or debris shall be contained on the building site. Additionally, the project site is larger than 1 acre and would be subject to NPDES Construction General Permit issued by the Los Angeles RWQCB. The permit requires the implementation of stormwater controls and development of a stormwater pollution prevention plan to minimize the amount of sediment and other pollutants from being discharged in stormwater runoff during	The project would be consistent with this policy.

Table 18. Policy Consistency Analysis

Land Use Element Policy Number	Land Use Element Policy	Project-Applicable Component(s)	Consistency Finding
		construction, as well as various temporary BMPs designed to prevent erosion and siltation, as well as the off-site conveyance of various on-site constituents. Additionally, the project would include a LID plan to comply with City efforts to retain stormwater runoff generating from new construction projects. The project site must meet the requirements of the LID Standards Manual, which would help to mitigate potential impacts to water quality.	
Policy 4.5.1	Pursue every applicable means and opportunities to reduce air particulate and pollutants within the City and region.	Refer to Section 3.3. Air Quality. The project would result in less-than-significant air quality impacts. Additionally, development of the project would involve the development of a truck terminal use on a site that is located proximate to regional highways (I-605, I-105, and I-710), thereby reducing the need for longer distance trips that could result in additional air pollutant emissions.	The project would be consistent with this policy.
Policy 4.6.1	Promote the conservation of energy by residents and businesses to conserve energy.	The project would be subject to and would comply with, at a minimum, the California Building Energy Efficiency Standards (24 CCR, Part 6). Part 6 of Title 24 establishes energy efficiency standards for nonresidential buildings constructed in California in order to reduce energy demand and consumption. As such, the project would assist the City in its goal to promote conservation of energy by businesses.	The project would be consistent with this policy.
Safety			
Policy 5.2.1	Monitor the generation, storage, and disposal of hazardous materials.	During construction of the project, potentially hazardous materials would likely be handled on the project site. Although these materials would likely be stored on the project site, storage would be required to comply with the guidelines set forth by each product's manufacturer and with all applicable federal, state, and local regulations pertaining to the storage of hazardous materials. Consistent with federal, state, and local requirements, the transport of hazardous materials to and from the project site would be conducted by a licensed contractor. Any handling,	The project would be consistent with this policy.

Table 18. Policy Consistency Analysis

Land Use Element Policy Number	Land Use Element Policy	Project-Applicable Component(s)	Consistency Finding
		transport, use, or disposal of hazardous materials would comply with all relevant federal, state, and local agencies and regulations, including the EPA, the California DTSC, Cal/OSHA, Caltrans, the Resource Conservation and Recovery Act, the SCAQMD, and the Los Angeles County Certified Unified Program Agency. In addition, any potentially hazardous material handled on the project site during operation would be limited in both quantity and concentrations, consistent with other similar industrial uses located in the City, and any handling, transport, use, and disposal would comply with applicable federal, state, and local agencies and regulations. Further, as mandated by OSHA (OSHA n.d.), all hazardous materials stored on the project site would be accompanied by a Material Safety Data Sheet, which would inform employees and first responders as to the necessary remediation procedures in the case of accidental release	
Policy 5.5.1	Minimize damage in the event of a major earthquake.	As set forth in Section 8001 of the City's Municipal Code, the City has adopted the current California Building Code. As such, the project would be designed in accordance with all applicable design provisions established in the current 2019 edition of the California Building Code, which dictates specifications to ensure structural integrity during a seismic event. Additionally, the project would adhere to building requirements set forth in the Geotechnical Report to address potential seismic-related impacts.	The project would be consistent with this policy.
Noise			
Policy 6.1.1	Minimize noise impacts onto noise-sensitive uses.	Refer to Section 3.13, Noise. The project would result in less-than-significant impacts to noise-sensitive uses with implementation of MM-NOI-1, which involves, among other things, erection of a temporary construction noise barrier to completely interrupt the line-of-sight (and sound) from the project site to nearby noise-sensitive residences. Therefore, impact to noise-sensitive uses	The project would be consistent with this policy.

Table 18. Policy Consistency Analysis

Land Use Element Policy Number	Land Use Element Policy	Project-Applicable Component(s)	Consistency Finding
		would be minimized to the maximum extent practicable.	
Policy 6.2.1	Reduce noise generated by vehicular traffic.	This policy is a City-level policy to be implemented by the City, and the project would not affect the City's ability take steps to reduce noise generated by vehicular traffic. Additionally, as discussed in Section 3.13, Noise, the project's traffic noise contribution as a result of trucks and vehicles accessing the project site would only be 0 to 1 dBA, which is not an audible change in the context of context of community noise (i.e., outside of a controlled test environment), and off-site traffic-related noise impacts were determined to be less than significant.	The project would be consistent with this policy.

The project would be consistent with the aforementioned policies in the City's General Plan adopted for the purpose of avoiding or mitigating environmental effects. Therefore, impacts associated with land use plans, policies, and regulations would be less than significant.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – Would the project:				
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?	☐	☐	☐	☒

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. According to the City's Downey Vision 2025 Comprehensive General Plan Update Draft Environmental Impact Report, the City does not have any known mineral resource areas (City of Downey

2004). Therefore, no impacts associated with mineral resources or locally important mineral resource recovery site would occur.

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. Refer to response provided in Section 3.11(a).

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
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?	☐	☐	☐	☒

a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less-than-Significant Impact with Mitigation Incorporated. During project construction, the project would result in a temporary increase in noise levels due to the use of construction equipment. During operation, on-site employees and truck drivers would generate additional traffic on local streets. Traffic noise would be a long-term source of noise from the project. The operation of the truck terminal would also result in on-site noise from trucks entering, exiting, and maneuvering; and from air-conditioning (HVAC) equipment.

The City's General Plan Noise Element addresses land use compatibility. The Noise Element states that an exterior community noise equivalent level greater than 70 A-weighted decibels (adjusted for the frequency

response of the human ear; dBA) is normally unacceptable for residential uses, transient lodging (i.e., motels and hotels), and schools, libraries, churches, hospitals and nursing homes (City of Downey 2005).

Noise levels are regulated by the City's Municipal Code, Article IV, Chapter 6 (City of Downey 2020). The sound limits apply to noise generation from one property to an adjacent property. The sound level limits depend on the time of day, the duration of the noise, and land use. According to the City's Municipal Code, the maximum permissible sound pressure level measured at the property boundary of residential, commercial, or manufacturing land uses from any noise source not operating on a public right-of-way shall constitute a public nuisance when such noise level exceeds 5 decibels (dB) above the ambient noise level at any period during the course of a 24-hour day. However, if a noise source is of a continuous nature and cannot reasonably be discontinued for a period wherein the ambient noise level can be determined, the maximum permissible steady noise level by sound sources across the property boundary of any land use cited in Table 19 may be less than, but not greater than, the sound level limits that are listed in the table (City of Downey 2020).

The nearest sensitive receptors that would potentially be impacted by noise generated during construction and operation of the project are residential uses located approximately 200 feet southwest of the project site. As defined in Table 19, residential land uses have a daytime noise standard of 55 dBA from 7:00 a.m. to 10:00 p.m. and a nighttime noise standard of 45 dBA from 10:00 p.m. to 7:00 a.m.

Table 19. Exterior Noise Limits

Land Use Category	Noise Level (dBA)	
	Nighttime *10:00 p.m.–7:00 a.m.*	*Daytime* *7:00 a.m.–10:00 p.m.*
Residential	45	55
Commercial	65	65
Manufacturing	70	70

Source: City of Downey 2020.
Note: dBA = A-weighted decibels.

However, according to the City's Municipal Code (Section 4606.5), construction, repair, or remodeling equipment and devices and other related construction noise sources are exempted from the provisions of the City's noise ordinance, provided a valid permit for such construction, repair, or remodeling has been obtained from the City. In any circumstance other than emergency work, no repair or remodeling is permitted to take place between 9:00 p.m. of one day and 7:00 a.m. of the following day, and no repair or remodeling is permitted to exceed 85 dBA across any property boundary at any time during the course of a 24-hour day (City of Downey 2020).

Ambient Noise Monitoring

Noise measurements were conducted at noise-sensitive receivers near the project site on July 8, 2020, to characterize the existing noise levels. The measurements were made using calibrated SoftdB Piccolo integrating sound level meters. The sound level meters meet the current American National Standards Institute standard for a Type 2 (general purpose) sound level meter. The accuracy of the sound level meter

was verified using a field calibrator before and after the measurements, and the measurements were conducted with the microphone positioned approximately 5 feet above the ground.

Five short-term noise measurement locations (ST) that represent existing sensitive receivers were selected near the Project Site. These locations are depicted as receivers ST1–ST5 on Figure 16, Noise Measurement and Modeling Locations. The measured energy-averaged (L_{eq}) and maximum (L_{max}) noise levels are provided in Table 20. The primary noise sources at the sites identified in Table 20 consisted of traffic along adjacent roadways; birdsong, distant conversations, and distant construction noise represented secondary noise sources. As shown in Table 20, the measured sound levels ranged from approximately 63 dBA L_{eq} at ST2 to 72 dBA L_{eq} at ST5. Table 20 provides the location, date, and time the noise measurements were taken. The field noise data sheets are provided in Appendix G.

Table 20. Ambient Measured Noise Levels

Site	Location	Measurement Date	Measurement Time	Average Sound Level (dBA L_{eq})	Maximum Sound Level (dBA L_{max})	Noise Sources
ST1	Church; 12112 Woodruff Avenue	7/8/2020	2:00 p.m. – 2:15 p.m.	71.0	87.8	Traffic noise, birds, distant conversations
ST2	Single-family residential; 12102 Cornuta Avenue	7/8/2020	2:26 p.m. – 2:41 p.m.	62.6	83.3	Traffic noise, birds, rustling leaves
ST3	Single-family residential (mobile home park); 12265 Woodruff Avenue	7/8/2020	2:57 p.m. – 3:12 p.m.	70.2	86.2	Traffic noise, birds, distant construction noise
ST4	Single-family residential; 12448 Woodruff Avenue	7/8/2020	3:33 p.m. – 3:48 p.m.	70.9	87.4	Traffic noise, birds
ST5	Multi-family residential; 11253 1/2 Regent View Avenue	7/8/2020	4:18 p.m. – 4:33 p.m.	72.2	88.4	Traffic noise, birds, distant power-tool noise

Source: Appendix G.
Notes: dBA = A-weighted decibels; L_{eq} = time-averaged equivalent noise level.

Short-Term Construction Impacts

Less-than-Significant Impact with Mitigation Incorporated. Construction of the project would generate noise that could expose nearby receptors to elevated noise levels that may disrupt communication and routine activities. The magnitude of the impact would depend on the type of construction activity, equipment, duration of the construction, distance between the noise source and receiver, and intervening structures. The following discussion addresses the noise levels estimated to result from construction of the project at nearby sensitive receptors (i.e., residences).

CalEEMod was used to identify the construction equipment anticipated for development of the project. Based on this information, CalEEMod identified the anticipated equipment for each phase of project construction, listed in Table 21.

Table 21. Construction Equipment by Phase

Construction Phase	Equipment	Quantity
Demolition	Concrete/industrial saws	1
	Excavators	3
	Other material-handling equipment (rock crusher and batch plant)	1
	Rubber-tired dozers	2
Site Preparation	Rubber-tired dozers	3
	Tractors/loaders/backhoes	4
Grading	Excavators	1
	Graders	1
	Rubber-tired dozers	1
	Tractors/loaders/backhoes	3
Building Construction	Cranes	1
	Forklifts	3
	Generator sets	1
	Tractors/loaders/backhoes	3
	Welders	1
Paving	Pavers	2
	Paving equipment	2
	Rollers	2
Architectural Coating	Air compressors	1

Source: Appendix B.

With the construction equipment noise sources identified in Table 21, a noise analysis was performed using the Federal Highway Administration's Roadway Construction Noise Model (RCNM) (FHWA 2008). Input variables for RCNM consist of the receiver/land use types, the equipment type (e.g., backhoe, grader, paver), the number of equipment pieces, the duty cycle for each piece of equipment (i.e., percentage of time the equipment typically works in a given time period), and the distance from the noise-sensitive receiver to the construction zone. The RCNM has default duty cycle values for the various pieces of equipment, which were derived from an extensive study of typical construction activity patterns. Those default duty cycle values were utilized for this analysis. Because the direct line of sight between the project site and the nearest noise-sensitive receivers would be partially or completely blocked by intervening buildings, a nominal 5 dB of acoustical shielding was assumed for most of the construction equipment/activities.

Sensitive receptors near the project site include residential uses to the southwest and a church located to the southeast. The City's municipal code exempts noise from construction equipment and devices and other related sources provided that a valid permit for such work has been obtained from the City and that such work takes place between 7:00 a.m. and 9:00 p.m. (City of Downey 2020). The results of the

construction noise analysis using the RCNM are summarized in Table 22. As shown, the worst-case noise levels from construction are predicted to range from approximately 61 dBA L_{eq} (during the architectural coating phase) to 73 dBA L_{eq} (during the demolition phase) at the nearest noise-sensitive receivers (i.e., the residences, each located approximately 220 feet from the closest point of construction). More typically, when construction would take place at various locations throughout the project site and the typical distance[19] between the nearest residences and construction would be approximately 400 feet, noise from construction would range from approximately 51 dBA L_{eq} to 70 dBA L_{eq}. At the church located to the southeast of the project site, the nearest construction activities would result in noise levels ranging from approximately 52 dBA L_{eq} to 69 dBA L_{eq}. Typical construction noise at the church would range from approximately 48 dBA L_{eq} to 67 dBA L_{eq}. The noise levels at the nearest residences would be up to 10 dBecibels higher than the measured ambient noise level in the area (as represented by receiver ST2). Thus, construction best management practices would be required through MM-NOI-1 to avoid a potentially significant short-term construction noise impact.

Table 22. Construction Noise Model Results Summary

Construction Phase	Construction Noise at Nearest Receiver Distances (L_{eq} [dBA])			
	Residences to the Southwest		*Church to the Southeast*	
	Nearest Source/Receiver Distance (Approximately 220 feet)	*Typical Source/Receiver Distance (Approximately 400 feet)*	*Nearest Source/Receiver Distance (Approximately 350 feet)*	*Typical Source/Receiver Distance (Approximately 550 feet)*
Demolition	73	70	68	67
Site Preparation	68	62	62	60
Grading	68	63	63	60
Building Construction	63	60	59	57
Paving	64	59	58	56
Architectural Coating	61	51	52	48

Source: Appendix G.
Notes: L_{eq} = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibel.

MM-NOI-1 The following measures shall be implemented to reduce construction noise and vibration emanating from construction of the project:

1. At least 30 days prior to commencement of construction, the project applicant's contractor shall provide written notice to all residential property owners and

[19] For the purpose of estimating the construction and on-site operational noise, the "typical" distance from the nearby noise-sensitive land uses to the construction activities was used. Construction equipment would typically be operating all over the project site, both near and far from any one location in the vicinity of the project site. For example, construction near the southwestern project boundary would take place within approximately 220 feet of existing residences, but during construction of other project components, construction would be approximately 700 feet or more away from noise-sensitive receptors. Thus, the distance from the nearby receivers to the "acoustic center" (the point from which the energy sum of all construction activity noise, near and far, would be centered on an average or typical basis) is used. The acoustic center is calculated by taking the square root of the product of the nearest and farthest distances (i.e., $[D_{ac} = (D_n * D_f)^{0.5}]$, where: D_{ac} is the acoustic center distance, D_n is the nearest estimated source-receiver distance, and D_f is the farthest estimated source-receiver distance) (Caltrans 2013a).

tenants within 300 feet of the project site that proposed construction activities could affect outdoor or indoor living areas. The notice shall contain a description of the project, a construction schedule including days and hours of construction, and a description of noise-reduction measures.

2. Noise-generating construction activities (which may include preparation for construction work) shall be permitted weekdays between 7:00 a.m. and 6:00 p.m., excluding federal holidays. When a holiday falls on a Saturday or Sunday, the preceding Friday or following Monday, respectively, shall be observed as a legal holiday.
3. Prior to commencement of demolition work, and throughout major construction work up to but not including architectural coating, a temporary construction noise barrier (8 feet in height) shall be erected along the southern project site boundary, from the southwestern corner extending a distance of 75 feet to the east. This barrier would completely interrupt the line-of-sight of the project site from residences to the southwest.
4. All construction equipment powered by internal combustion engines shall be properly muffled and maintained. No internal combustion engine shall be operated on the site without a muffler. All diesel equipment shall be operated with closed engine doors and shall be equipped with factory recommended mufflers. Unnecessary idling of internal combustion engines shall be prohibited.
5. Air compressors and generators used for construction shall be surrounded by temporary acoustical shelters. Whenever feasible, electrical power shall be used to run air compressors and similar power tools.
6. The distance between construction equipment staging areas and adjacent residences shall be maximized where feasible.
7. During construction, stationary construction equipment shall be placed such that emitted noise is directed away from or shielded from sensitive receptors.
8. Stationary construction equipment that generates noise that exceeds 85 A-weighted decibels at the property boundaries shall be shielded with a barrier that meets a Sound Transmission Class rating of 25.

Effectiveness of the BMPs listed in MM-NOI-1 would vary from several decibels (which in general is a relatively small change) to 10 or more decibels (which subjectively would be perceived as a substantial change), depending upon the specific equipment and the original condition of that equipment, the specific locations of the noise sources and the receivers, etc. Installation of the temporary construction noise barrier, for example, would vary in effectiveness depending upon the degree to which the line-of-sight between the source and receiver is broken; in this case, the barrier would provide a minimum noise reduction of 6 dB. Installation of more effective silencers could range from several decibels to well over 10 dB. Reduction of idling equipment could reduce overall noise levels from barely any reduction to several decibels. Cumulatively, however, these measures would result in substantial decreases in the noise from construction. Therefore, with implementation of mitigation, short-term construction noise impacts would be less than significant.

Long-Term Operational Impacts

During operation, the project would be used to mobilize both imported and exported goods that pass through the Ports of Los Angeles and Long Beach. Consequently, potential operational noise impacts include off-site traffic noise (from additional project-related trucks and passenger vehicles) and on-site noise from vehicle movements, loading/unloading, and stationary mechanical equipment.

Off-site Traffic Noise

Less-than-Significant Impact. The project has the potential to result in significant off-site noise impacts from project-related traffic at nearby noise-sensitive land uses. Based upon information from Dudek transportation specialists (Section 3.17), during the AM peak hour, implementation of the project would result in a total of 11 passenger vehicles, 1 two-axle truck, 1 three-axle truck, and 3 four-or-more axle trucks. During the PM peak hour, implementation of the project would result in a total of 10 passenger vehicles, 1 two-axle truck, 1 three-axle truck, and 3 four-or-more axle trucks. In terms of average daily trips, the project would generate approximately 75 passenger vehicle trips, 7 two-axle truck trips, 6 three-axle truck trips, and 20 four-or-more axle truck trips. All passenger vehicle and truck trips would access and exit the project site to the east, via Woodruff Avenue, and the truck trips would be limited to City of Downey truck routes (shown on Figure 17).

Potential noise effects from vehicular traffic were assessed using the Federal Highway Administration's Traffic Noise Model Version 2.5 (FHWA 2004). Information used in the model included the Existing, Existing plus Project, Year 2022, and Year 2022 plus Project traffic volumes. Noise levels were modeled at representative noise-sensitive receivers. The receivers were modeled to be 5 feet above the local ground elevation. The six receiver locations used for the short-term noise measurements were used to represent existing off-site noise-sensitive land uses (residences and a church) (Figure 16, Noise Measurement and Modeling Locations). The measured and modeled receiver locations are presented in Table 23.

The information provided from this modeling, along with the results from ambient noise survey measurements, was compared to the noise impact significance criteria to assess whether project-related traffic noise would cause a significant impact and, if so, where these impacts would occur. The results of the comparisons for the off-site noise-sensitive land uses are summarized in Table 23.

Table 23. Summary of Off-Site Existing and Future (Year 2022) Unmitigated Traffic Noise Levels (dBA CNEL)

Modeled Receptor	Existing	Existing plus Project	Future (Year 2022)	Future (Year 2022) plus Project	Maximum Project-Related Noise Level Increase (dB)
ST1 - Church; 12112 Woodruff Avenue	67	67	68	68	0
ST2 - Single-family residential; 12102 Cornuta Avenue	64	64	64	64	0

Table 23. Summary of Off-Site Existing and Future (Year 2022) Unmitigated Traffic Noise Levels (dBA CNEL)

Modeled Receptor	Existing	Existing plus Project	Future (Year 2022)	Future (Year 2022) plus Project	Maximum Project-Related Noise Level Increase (dB)
ST3 - Single-family residential (mobile home park); 12265 Woodruff Avenue	69	69	69	69	0
ST4 - Single-family residential; 12448 Woodruff Avenue	69	70	70	70	1
ST5 - Multi-family residential; 11253 1/2 Regent View Avenue	70	70	70	71	1

Source: Appendix G.
Notes: dBA = A-weighted decibel; CNEL = Community Noise Equivalent Level; dB = decibel.
Traffic noise levels are rounded to the nearest whole numbers.

As shown in Table 23, the project would increase the traffic noise levels along the nearby arterial roadways by 0 dBA to 1 dBA (when rounded to whole numbers). A change (either an increase or a decrease) of 1 dB or less is not an audible change in the context of community noise (i.e., outside of a controlled test environment). In addition, the project would not cause noise levels to exceed applicable City noise standards. The project is not anticipated to result in significant traffic noise increases or cause an exceedance of applicable traffic noise standards. Therefore, impacts associated with off-site traffic noise would be less than significant.

On-Site Operational Noise

Less-than-Significant Impact. The principal use of the project would be for storage of and/or consolidation of manufactured goods before the distribution to retail locations or other warehouses. Other than truck parking and storage, all activities will occur within the industrial building. The project would include office space uses ancillary to the warehouse operation.

Although the site currently is occupied by an industrial land use, implementation of the project would result in changes to existing noise levels on the project site by developing new stationary sources of noise, including outdoor HVAC equipment, and vehicle parking lot and truck loading dock activities. These sources may affect noise-sensitive land uses in the vicinity of the project site. The following analysis evaluates noise from exterior mechanical equipment and activities associated with vehicle parking lots and truck loading docks.

Outdoor Mechanical Equipment

The proposed warehouse space within the warehouse/office building would not be served by heating or air conditioning equipment. However, the proposed office area would be equipped with single-packaged rooftop HVAC units with air-handling capacity of 20 to 60 nominal tons. For the analysis of noise from HVAC equipment operation, a Carrier WeatherMaker A HVAC unit was used as a reference.

Noise level data provided by the manufacturer was used to determine the noise levels that would be generated by the HVAC equipment. Based on the warehouse/office building's roof design, there will be a 6-foot-high parapet extending along the perimeter of the office roof. Assuming that the HVAC equipment is operating for a minimum period of 1 hour, the worst-case calculated noise levels at the nearest residential property line (to the southwest) and the project sites' northern, southern, eastern, and western property boundaries are presented in Table 24. The calculation was performed at the worst-case location of each of the project boundary lines—that is, the closest distance between the potential office location and the adjacent property lines, to ensure that the shortest distance from equipment to property line was examined. The maximum hourly noise level for the HVAC equipment operating at each examined point along the property would range from approximately 26 dBA L_{eq} at the nearest residences to the southwest to 31 dBA L_{eq} at the projects' northern, southern, and eastern property boundaries. These levels are less than the City's noise standards for manufacturing (70 dBA L_{eq} daytime or nighttime) and residential (55 dBA L_{eq} daytime [7:00 a.m. to 10:00 p.m.], 45 dBA L_{eq} nighttime [10:00 p.m. to 7:00 a.m.]) and are well below the measured ambient noise levels in the project area.

Table 24. Mechanical Equipment (HVAC) Noise

Receiver Location	Noise Level at Noise-Sensitive Use or Property Boundary	
	Noise Source	*Average Noise Level (dBA L_{eq})*
Residences to southwest	HVAC Equipment	26
Northern property boundary	HVAC Equipment	31
Southern property boundary	HVAC Equipment	31
Eastern property boundary	HVAC Equipment	31
Western property boundary	HVAC Equipment	27

Source: Appendix G.
Note: dBA = A-weighted decibel; L_{eq} = equivalent continuous sound level; HVAC = heating, ventilation and air conditioning.

The results of the mechanical equipment operations noise analysis indicate that the project would comply with the City's noise ordinance. Mechanical equipment operation would result in noise at the project site property boundaries/nearest noise-sensitive receiver boundaries that are less than the applicable noise standards. Therefore, impacts associated with on-site HVAC noise would be less than significant.

Parking Lot Activity

A comprehensive study of noise levels associated with surface parking lots was published in the Journal of Environmental Engineering and Landscape Management (Baltrënas et al. 2004). The study found that average noise levels during the peak period of use of the parking lot (generally in the morning with arrival of commuters, and in the evening with the departure of commuters), was 47 dBA at 1 meter (3.28 feet) from the outside boundary of the parking lot. The parking area would function as a point source for noise, which means that noise would attenuate at a rate of 6 dBA with each doubling of distance. The employee parking lot is proposed to be situated on the east side of the warehouse/office building, adjacent to Woodruff Avenue. The acoustic center of the parking area would be no closer than 40 feet from the eastern property line of the project site (and approximately 470 feet from the nearest noise-sensitive land use, the church to the southeast). At a distance of 40 feet, parking lot noise levels would be no greater than 25 dBA L_{eq} at the eastern property line, and approximately 4 dBA L_{eq} at the nearest noise-sensitive land use. These

noise levels are well below applicable City of Downey noise standards. Therefore, impacts associated with parking lot noise would be less than significant.

Truck Loading Dock/Truck Yard Activity

The aforementioned parking lot study (Baltrënas et al. 2004) also examined noise levels associated with cargo truck delivery activity. The study concluded that average noise levels from truck loading/unloading areas was 96 dBA at 1 meter (3.28 feet) from the boundary of the truck activity area. The acoustic center of truck loading dock activities would be located approximately 300 feet from the nearest residential property line (located to the southwest), 95 feet from the northern and southern property boundaries, 150 feet from the western property boundary, and 310 feet from the eastern property boundary. Using the outdoor attenuation rate of 6 dBA with each doubling of distance, truck loading activity at the residences to the southwest would produce noise levels of approximately 56 dBA L_{eq}. However, the existing intervening buildings just south of the project site would provide a substantial amount of noise reduction by blocking the direct line-of-sight between the truck loading dock area and the residences to the southwest. Because of the height and size of the building, it is estimated that the noise from loading dock activities would be reduced by approximately 14 dB or more. Thus, the loading dock noise at the nearest residences would be approximately 42 dBA L_{eq}, which would be below the City's residential exposure limits of 55 dBA L_{eq} daytime (7:00 a.m. to 10:00 p.m.) and 45 dBA L_{eq} nighttime (10:00 p.m. to 7:00 a.m.). The loading dock area noise levels along the nearest property boundaries from truck loading activity (the northern and southern boundaries) would average 67 dBA L_{eq}; the noise levels at the other property boundaries would be lower because of the greater distances. These levels are less than the City's noise standards for manufacturing (70 dBA L_{eq} daytime or nighttime). Therefore, impacts associated with truck loading docks and truck yard noise would be less than significant.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less-than-Significant Impact. Construction activities have the potential to expose persons to excessive ground-borne vibration or ground-borne noise. Caltrans has collected ground-borne vibration information related to construction activities indicating that continuous vibrations with a peak particle velocity of approximately 0.1 inches/second begin to annoy people.[20] The heavier pieces of construction equipment, such as an excavator, would have peak particle velocities of approximately 0.089 inches/second or less at a distance of 25 feet.[21] Ground-borne vibration is typically attenuated over short distances. At the distance from the nearest vibration-sensitive uses (i.e., residences) to the project site (approximately 220 feet), and with the anticipated construction equipment, the peak particle velocity vibration level would be approximately 0.003 inches/second. This vibration level would be well below the vibration threshold of potential annoyance of 0.1 inches/second.

The major concern with regard to construction vibration is related to building damage. Construction vibration as a result of the project would not result in structural building damage, which typically occurs at vibration levels of 0.5 inches/second or greater for buildings of reinforced-concrete, steel, or timber construction. The heavier pieces of construction equipment used would include typical construction

[20] Caltrans. 2013b. Transportation and Construction Vibration Guidance Manual. Division of Environmental Analysis, Environmental Engineering, Hazardous Waste, Air, Noise, Paleontology Office. September, 2013

[21] DOT (U.S. Department of Transportation). 2018. Transit Noise and Vibration Impact Assessment Manual. DOT, Federal Transit Administration. September 2018.

equipment for this type of project, such as backhoes, front-end loaders, and flatbed trucks. Pile driving, blasting, and other special construction techniques would not be used for construction of the project; therefore, excessive ground-borne vibration and ground-borne noise would not be generated. Vibration levels from project construction would be less than the thresholds of annoyance and potential for structural damage. Furthermore, there would be no operational activities associated with the project. Therefore, groundborne vibration impacts would be less than significant.

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?

No Impact. The closest public airport to the Project site is Compton/Woodley Airport, which is located approximately 7.2 miles west/southwest of the project site in the City of Compton. The next-nearest airport is Long Beach Municipal Airport, located approximately 7.4 miles to the south. According to the Los Angeles County Airport Land Use Plan (ALUC 2014), the project site is not in proximity to the planning boundary or airport influence area of any airports. No private airstrips are located within the vicinity of the project site (AirNav 2019). Thus, air traffic noise associated with airports would not expose construction workers, staff, or students to excessive noise levels. Therefore, no impacts associated with airport noise would occur.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the project:				
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) Would the project 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)?

Less-than-Significant Impact. The project would include the demolition of an existing, 74,662-square-foot industrial building and construction of an approximately 44,162-square-foot industrial tilt-up building (industrial building) for truck terminal use. No residential use or other land uses typically associated with directly inducing population growth are included as part of the project.

It is anticipated that construction workers would come from the local labor force, and given the temporary nature of the construction work, it is unlikely construction workers would relocate to the area as a result of the project. However, because the project is not a nonresidential use that typically induces substantial population growth (i.e., universities, large business centers, or other uses that result in substantial relocation of employees or stimulate substantial growth of the area through economic means), it is assumed that the project would not likely induce substantial population growth through employees relocating to the area.

SCAG is a metropolitan planning organization that represents the Counties of Ventura, Los Angeles, San Bernardino, Orange, Riverside, and Imperial. As part of the 2016–2040 RTP/SCS, SCAG has prepared population, household, and employee projections for the region. Table 25 shows the employee projections from 2012 to 2040 for the City of Downey.

Table 25. Employment Growth for the City of Downey

	2012	2040
Employment	47,500	53,000

Source: SCAG 2016.

The proposed industrial building would introduce 15 to 30 new employees to the City of Downey. This increase would be 0.2% to 0.5% of SCAG's overall projected growth of 5,500 employees for the City from 2012 to 2040. As such, employee growth as a result of the project is well within SCAG's overall growth projections for the City and would not result in a substantial increase in population.

Furthermore, the project would connect to existing utilities and infrastructure already located in the project area and would not construct new or extend existing utilities or infrastructure into areas not currently served by such improvements. Therefore, impacts associated with both direct and indirect population growth inducement would be less than significant.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The project site is currently developed with an existing industrial building. There are no existing residential uses on the project site, and the project would not displace any existing housing or population. Therefore, no impacts associated with displacing substantial numbers of existing people or housing would occur.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. 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:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

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:

Fire protection?

Less-than-Significant Impact: Fire services in the City are provided by the Downey Fire Department (DFD), except for properties owned by the County of Los Angeles in the southwest part of the City, which are patrolled by the Los Angeles County Fire Department. DFD has four stations in four corresponding fire districts. The first-alarm response to structure fires in the City consists of three engine companies, one ladder truck, a paramedic squad and a Battalion Chief (totaling 16 personnel). The project site would be served by Fire Station 2 (9556 Imperial Highway), located approximately 0.6 miles southwest of the project site. The estimated response times to service calls for DFD is 3 to 4 minutes. Additionally, DFD has automatic aid agreements with the Cities of Santa Fe Springs and Montebello and the County of Los Angeles. The agreement provides coverage at fires by the nearest unit regardless of the jurisdictional boundary (City of Downey 2005).

The project site is already within the DFD service area, and once operational, the project would continue to be served by DFD. As previously discussed in Section 3.14, Population and Housing, the project would not induce substantial population growth in the City. Because the project site currently supports existing industrial operations, calls for service to the project site in comparison to the existing conditions would be similar to the baseline conditions. Overall, it is anticipated that the project would be adequately served by existing DFD facilities, equipment, and personnel. Therefore, impacts associated with the construction or expansion of fire protection facilities would be less than significant.

Police protection?

Less-than-Significant Impact: Police services in the City are provided by the DPD, except for properties owned by the County of Los Angeles in the southwest part of the City, which are patrolled by the Los Angeles County Sheriff's Department. DPD (10911 Brookshire Avenue) would service the project site and is located approximately 1 mile northwest of the project site. The estimated response times to service calls for DPD are 1 to 2 minutes for emergency calls and 5 to 8 minutes for nonemergency calls. DPD has 138 sworn officers and responds to an average of 1,000 service calls per month. Additionally, DPD has mutual aid agreements with all cities in Los Angeles County, with the exception of the City of Los Angeles. The agreement establishes a reciprocal law enforcement status between other cities and the City of Downey (City of Downey 2005).

The project site is already within the DPD service area, and once operational, the project would continue to be served by DPD. As previously discussed in Section 3.14, Population and Housing, the project would not induce substantial population growth in the City. Because the project site currently supports existing industrial operations, calls for service to the project site in comparison to the existing conditions would be similar to the baseline conditions. Overall, it is anticipated that the project would be adequately served by existing DPD facilities, equipment, and personnel. Therefore, impacts associated with the construction or expansion of police protection facilities would be less than significant.

Schools?

Less-than-Significant Impact: Elementary through high school education in the City is provided by the Downey Unified School District. As previously mentioned, the project would not induce substantial population growth in the City. As such, a significant increase in school-age children requiring public education is not expected to occur, and there would be no need for the development of additional schools. Therefore, impacts associated with the construction or expansion of school facilities would be less than significant.

Parks?

Less-than-Significant Impact: Refer to response provide in Section 3.16(a).

Other public facilities?

Less-than-Significant Impact: As previously mentioned, the project would not induce substantial population growth in the City. Employee growth as a result of the project is well within SCAG's overall growth projections for the City and would not result in a substantial increase in population. As such, a substantial increase in patronage at libraries, community centers, and other public facilities is not expected. Therefore, impacts associated with other public facilities would be less than significant.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
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) 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?

Less-than-Significant Impact: As previously discussed in Section 3.14(a), Population and Housing, no residential use or other land uses typically associated with directly inducing population growth are included as part of the project. Additionally, the project is industrial in nature and does not include recreational facilities. However, construction and operation of the project would generate temporary and permanent employees. It is anticipated that construction workers would come from the local labor force, and given the temporary nature of the construction work, it is unlikely construction workers would relocate to the area as a result of the project. However, this analysis conservatively assumes that all 15 to 30 new permanent, employees would relocate to the area. However, employee growth as a result of the project is well within SCAG's overall growth projections for the City and would not result in a substantial increase in population. As such, an increase in patronage at park facilities is not expected.

State law (the Quimby Act) authorizes cities to require developers to either dedicate land for parks and/or provide a fee in lieu of land dedication. The City developed a fee amount charged for new housing units constructed and has collected a significant amount used towards park maintenance. As part of a move towards recovering costs associated with new developments, there is an opportunity to expand the fees charged for development to fund park maintenance and upgrade (City of Downey 2005).

Therefore, because the project would not propose any recreational facilities, the number of permanent employees would be well within SCAG's overall growth projections for the City, and the City would continue to maintain and upgrade existing parks; impacts associated with parks would be less than significant.

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?

Less-than-Significant Impact: Refer to response provide in Section 3.16(a).

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
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 section 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?	☐	☐	☐	☒

This section analyzes the impacts of the project based on CEQA Guidelines Section 15064.3(b), which focuses on newly adopted criteria (vehicle miles traveled, or VMT) pursuant to SB 743 for determining the significance of transportation impacts. Pursuant to SB 743, the focus of transportation analysis changed from LOS or vehicle delay to VMT. The related updates to the CEQA Guidelines required under SB 743 were approved on December 28, 2018.

Accordingly, for CEQA purposes, this section analyzes the project-related impacts pertaining to VMT.

A congestion-based (LOS) analysis has been prepared and is provided for informational purposes only in Appendix C.

a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less-Than-Significant Impact. The study area intersections analyzed in the TIA, Appendix C, with exception of the I-605 freeway ramp intersections with Firestone Boulevard, are located within the jurisdiction of the City of Downey, therefore, the following consistency requirements would apply.

Downey Vision 2025 Circulation Chapter

This analysis uses the LOS threshold provided in the Downey Vision 2025 Circulation Element of the current General Plan (City of Downey 2005) for the intersections located within the City of Downey. The Circulation Element defines acceptable LOS as "A," "B," "C," or "D," along with the following applicable policy and program:

Policy 2.1.1. Maintain a street system that provides safe and efficient movement of people and goods.

- **Program 2.1.1.1.** Maintain intersections and street segments at acceptable service levels and not worsen those intersections and street segments currently operating at unacceptable levels.

For the purposes of this analysis, an intersection or street segment would be found inconsistent with the City's Circulation Chapter if project traffic causes a roadway to go from an acceptable LOS to a deficient LOS. For intersections and roadway segments already operating at an unacceptable LOS, any increase in the volume-to-capacity ratio for intersections and street segments would be found inconsistent with the City's Circulation Chapter. As shown in the TIA (Appendix C), the study area intersections located within the City of Downey would not be inconsistent with the LOS D standard as defined in the Circulation Chapter, and as set forth by Program 2.1.1.1 under Policy 2.1.1 noted above. Impacts related to applicable General Plan policies/programs related to traffic would be less-than-significant.

Transit Facilities

Currently, the City of Downey is served by the Los Angeles County Metropolitan Transportation Authority (Metro). Metrolink service in the City is provided via the Green Line at the Lakewood Boulevard Station, located approximately 1.5 miles southwest of the project site, as well as the Norwalk Station, located approximately 1 mile southeast of the project site (Metro 2018).

Additionally, the following Metro bus lines are located within 0.5 miles of the project site:

- **Line 115** operates between Playa Del Rey and the Norwalk Metrolink Station with a peak service frequency of 15 minutes. Line 115 primarily operates along Firestone Boulevard within the City of Downey (Metro 2020a).
- **Line 127** operates between Compton Station/MLK Jr. Transit Center and the Downey Deport Transit Center with a peak service frequency of 60 minutes. Line 127 primarily operates along Bellflower Boulevard within the City of Downey (Metro 2020b).

The nearest bus stops are located at Bellflower Boulevard/Washburn Road, serving Line 127, and Firestone Boulevard/Steward and Gray Road, serving Line 115. Development of the project would not conflict with the existing bus routes or bus stops. Impacts to transit would be less-than-significant.

Pedestrian and Bicycle Facilities

There are currently no designated bicycle facilities within the City of Downey, aside from the San Gabriel River Trail, as shown in Figure 18, City of Downey Transit and Bicycle Facilities. The Southern California Regional Bikeway shapefile identifies potential bicycle routes within the City, also identified in Figure 18. Additionally, the Downey Bike Master Plan Implementation Phase 1 Downtown/Transit project under

Capital Improvement Program 19-14 would include installation of Class II bicycle facilities on nine roadway segments, bicycle parking facilities, and way-finding signs (City of Downey 2020b).

Woodruff Avenue, which runs adjacent to the eastern boundary of the project site, is generally built with paved sidewalks and pedestrian facilities along both sides of the street. Additionally, the Woodruff Avenue Pavement Rehabilitation project under Capital Improvement Project 14-14 would not only include rehabilitation of asphalt pavement on the roadway but would also include miscellaneous repairs of existing concrete sidewalks, curb and gutter, driveway approaches, and Americans with Disabilities Act-compliant curb access ramps. Development of the project would not conflict with the existing pedestrian or bicycle facilities and would include frontage improvements to pedestrian facilities around the project site. Impacts to pedestrian or bicycle facilities would be less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less-Than-Significant Impact. CEQA Guidelines Section 15064.3(b) focuses on VMT for determining the significance of transportation impacts. As shown in the analysis below, the project's impact due to conflict or inconsistency with Section 15064.3(b) would be less than significant.

Vehicle Miles Traveled

The CEQA Guidelines state that "generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts" and define VMT as "the amount and distance of automobile travel attributable to a project…." It should be noted that "automobile" refers to on-road passenger vehicles, specifically cars and light trucks. Heavy-duty truck VMT could be included for modeling convenience and ease of calculation (for example, where models or data provide combined auto and heavy truck VMT). Other relevant considerations may include the effects of the project on transit and non-motorized travel. The OPR Technical Advisory (OPR 2018) provides guidance and tools to properly carry out the principles within SB 743 and how to evaluate transportation impacts in CEQA. The OPR Technical Advisory was utilized within this analysis as the primary source of analysis of VMT and transportation-related impacts.

Screening Criteria for VMT Analysis

The Technical Advisory suggests that agencies may screen out VMT impacts using project size, maps, transit availability, and provision of affordable housing.

Screening Threshold for Small Projects (110 daily trips or less). Table 26 uses trip generation rates from the Institute of Transportation Engineers (ITE) Trip Generation, 10th edition (2017) and 9th edition (2012) for land use category Intermodal Truck Terminal (ITE Code 30), and employee trip generation rate for Manufacturing use. A trip credit for the existing full on-site operational activities of the existing site was factored. After adjusting for the passenger car equivalent (PCE) factor, and using the City of Fontana Truck Trip Generation Study Truck Terminal vehicle mix and percentage splits, the project would generate approximately 232 net daily trips, 53 AM peak hour net trips (-5 inbound and 58 outbound), and 55 PM peak hour trips (41 inbound and 14 outbound).

Table 26. Project Trip Generation for 12021 Woodruff Avenue Industrial Building Project

Land Use	ITE Code	Size/Units	Daily	AM Peak Hour			PM Peak Hour		
				In	*Out*	*Total*	*In*	*Out*	*Total*
Trip Rates[1, 2]									
Intermodal Truck Terminal	30	Acres	81.90	—	—	—	—	—	—
Intermodal Truck Terminal	30	TSF	—	0.93	1.04	1.97	0.97	0.90	1.87
Manufacturing	140	Employees	2.47	0.27	0.10	0.37	0.13	0.20	0.33
Trip Generation									
Woodruff Truck Terminal	30	6.310 /Acres	517	19	27	46	18	24	41
Woodruff Truck Terminal	30	44.162/TSF	0	41	46	87	43	40	83
Existing Site	140	200/ Employees	494	55	19	74	26	40	66
Existing Site Trip Generation (w/PCE)									
Vehicle Mix[3]		***Percent[3]***							
Passenger Vehicles		69.0%	341	38	13	51	18	28	46
Two-Axle Trucks		6.8%	34	4	1	5	2	3	5
Three-Axle Trucks		5.5%	27	3	1	4	1	2	3
Four+-Axle Trucks		18.7%	92	10	4	14	5	8	13
Vehicle Mix[3]		***PCE Factor[4]***							
Passenger Vehicles		1.0	341	38	13	51	18	28	46
Two-Axle Trucks		2.0	67	7	3	10	4	5	9
Three-Axle Trucks		2.0	54	6	2	8	3	4	7
Four+-Axle Trucks		3.0	277	31	11	42	14	23	37
Existing Site Trip Generation W/PCE			*740*	*82*	*29*	*111*	*39*	*60*	*99*
Project Trip Generation (w/PCE)									
Vehicle Mix[5]		***Percent[5]***							
Passenger Vehicles		46.0%	238	19	21	40	20	18	38
Two-Axle Trucks		6.1%	32	2	3	5	3	2	5
Three-Axle Trucks		13.9%	72	6	6	12	6	6	11
Four+-Axle Trucks		34.0%	176	14	16	30	15	13	28
Vehicle Mix[5]		***PCE Factor[4]***							
Passenger Vehicles		1.0	238	19	21	40	20	18	37
Two-Axle Trucks		2.0	63	5	6	11	5	5	10
Three-Axle Trucks		2.0	144	11	13	24	12	11	23
Four+-Axle Trucks		3.0	527	42	47	89	44	40	84
Project Trip Generation W/PCE			*972*	*77*	*87*	*164*	*80*	*74*	*154*
Total Net Project Trip Generation (Project - Existing)			**232**	**-5**	**58**	**53**	**41**	**14**	**55**

Notes: ITE = Institute of Transportation Engineers; TSF = thousand square feet; PCE = passenger car equivalent.

1 ITE 2017.

2 ITE 2012.

3 SCAQMD 2014.

4 PCE factors are assumed to be 1.0 for passenger vehicles, 2.0 for medium trucks, and 3.0 for heavy trucks.

5 City of Fontana 2003.

Since the project generates more than 110 trips per day, it cannot be assumed to cause a less-than-significant transportation impact.

- **Presumption of Less-than-Significant Impact for Affordable Residential Development:** The project does not propose affordable residential units and is not a residential development.
- **Map-Based Screening for Residential and Office Projects:** This criterion applies to residential and office projects and currently, the City does not have VMT maps that can be used to identify areas with low VMT for projects.
- **Presumption of Less-than-Significant Impact Near High Quality Transit Corridor[22]:** Figure 18, Transit and Bicycle Facilities, illustrates the project's location and transit facilities around the project. Metro Bus Line 115 operates with a service frequency of 15 minutes, between Playa Del Rey and the Norwalk Metrolink Station. Since the project is within 0.5 miles of a high-quality transit corridor (i.e., a fixed route bus service with service intervals no longer than 15 minutes during peak commute hours) it can be presumed to have a less-than-significant impact. Additionally, the Norwalk Metrolink station is located approximately 1 mile southeast of the project site.

Furthermore, the presumption of less than significant does not apply if the project:

- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- Is consistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization; or
- Replaces affordable residential units with a smaller number of moderate or high-income residential units.

The project does not include more parking than required by the City of Downey, as discussed in the TIA and detailed in Section 2, Project Description. Additionally, the project use (with the exception of westernmost portion of the project site which is designated as a Parking Buffer) is consistent with the City of Downey General Plan Land use designation of General Manufacturing. Furthermore, the project does not involve a residential component. Therefore, the above items would not apply to the project, and the project can be screened out under the proximity to high quality transit corridor screening criteria.

The project's employees would have access to a high-quality transit corridor, and the project would not provide more parking for use than required by the jurisdiction. A project-level detailed VMT analysis would not be required, and the project would not be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b); therefore, the impact would be less than significant. In addition, in an abundance of caution and to further minimize an already less-than-significant impact related to VMT, the project would implement a transportation demand management plan, as described in project design feature (PDF) TRA-1:

[22] A Transit Priority Area is defined as a 0.5-mile area around an existing major transit stop or an existing stop along a high quality transit quality corridor per definition below:
California Public Resources Code, Section 21064.3 - 'Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.
California Public Resources Code, Section 21155 - For purposes of this section, a 'high-quality transit corridor' means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

PDF-TRA-1 **Transportation Demand Management Plan:** Prior to issuance of a Business License, the tenant shall prepare a Transportation Demand Management plan to discourage single-occupancy vehicle trips made by employees, and encourage them to use alternative modes of transportation such as carpooling, taking transit, walking, and biking to/from the site. Examples of trip reduction measures may include, but are not limited to:

- Transit passes
- Car-sharing programs
- Telecommuting and alternative work schedules
- Ride sharing programs

Furthermore, the project is intended to be used as a trucking terminal for distribution and logistics purposes. On-site activities will include storage of and/or consolidation of manufactured goods before the distribution to retail locations or other warehouses. Thus, the project will serve as an intermediary land use between the Ports of Los Angeles and Long Beach and the next/final destination (warehouses) of the products shipped through the trucks-trailers using the project.

There are four freeways that provide direct access to the City of Downey: I-710, I-605, I-5, and I-105. I-710 is located west of the City and accessible via three major streets: Florence Avenue, Firestone Boulevard, and Imperial Highway. Figure 17 illustrates the truck routes in the City. Firestone Boulevard, Woodruff Avenue, Stewart and Gray Road, and Bellflower Boulevard are designated truck routes that connect the City with neighboring jurisdictions. The City of Downey is located approximately 14 miles and 12 miles northeast of the Ports of Los Angeles and Long Beach, respectively.

The proximity to freeway and ports would reduce the project's trips on other roadways and facilitate tractor trailer traffic destined for pick-up/drop-off of containers. The Ports of Los Angeles and Long Beach are the two largest container ports in the United States. The growth of the ports has been steady, and it is forecast to double in the next two decades, according to its most recent forecast. The ports' growth would have a significant impact on local economy and directly or indirectly provide for more jobs in the region. Therefore, the City would benefit from developing the site as a use that benefits from its proximity to the ports.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less-Than-Significant Impact. The project would not include construction of any new roadways, modifications to any existing roadway or intersection geometry, or temporary road closures during construction. Any and all improvements required within the public right-of-way would be required to comply with standards set forth by the City to ensure that the project does not introduce an incompatible design feature that would impede operations on project-adjacent roadway facilities.

As the project is an industrial use expected to generate heavy truck traffic, a queuing analysis was completed at both driveways. Additionally, since the project has the potential to add traffic to nearby freeway facilities, a queuing analysis was conducted at freeway off-ramp intersections within the study area. Queuing was analyzed utilizing the SimTraffic software, which calculates the 95th percentile (design) queue. All queuing analysis data and SimTraffic queuing worksheets are further provided below and in the TIA.

Future Year Conditions

Both project site access and freeway off-ramp facilities were analyzed and compared plus project conditions to baseline future year conditions. For the purposes of this analysis, the baseline future year condition is the Existing plus Ambient Growth plus Cumulative Project (EAC) scenario. The EAC scenario consists of existing traffic volumes, ambient growth from the background growth of traffic within the study area, and cumulative projects. Due to the Covid-19 pandemic, existing traffic volumes were adjusted and balanced. Counts were originally obtained in July 2020 for the following signalized intersections adjacent to the project site:

- Woodruff Avenue/Washburn Road
- Woodruff Avenue/Stewart and Gray Road

Historical traffic counts and traffic volumes from the following signalized intersections were obtained and were collected during a typical weekday non-holiday period in the year listed:

- Woodruff Avenue/Stewart and Gray Road – 2015
- Firestone Boulevard/Stewart and Gray Road – 2016
- I-605 southbound ramps/Firestone Boulevard – 2016
- I-605 northbound ramps – Hoxie Avenue/Firestone Boulevard – 2016

By calculating the difference between pre-Covid conditions and historical traffic count data, it was determined that the July 2020 traffic volumes were substantially lower due to the Covid-19 pandemic. Thus, traffic volumes collected in 2020 were adjusted and balanced to reflect the conditions of the historical traffic counts. Subsequently, all traffic counts were grown 4 years (approximately 1% per year) according to the growth rates listed from the year 2015 to 2020 Downey Regional Statistical Area as described in the Los Angeles County Congestion Management Program (Metro 2010).

Once traffic counts at the signalized intersections were grown and balanced to reflect pre-Covid 2020 baseline conditions, an ambient growth rate of 0.24% per year was derived from the growth rates listed in the Downey Regional Statistical Area from the year 2020 to 2025. The growth was applied based upon the projected opening year of the project being 2022; therefore, a total growth of 0.48% was added to the 2020 baseline existing traffic volumes. Finally, the City of Downey Planning Department and the City of Norwalk Planning Department provided a list of cumulative projects within the study area. Thereafter, the Project Trip Generation as shown in Table 26 was added to the EAC scenario so that the traffic impacts of the project could be fully analyzed. The TIA provides additional detail and information for the analysis and discussion on traffic volumes.

Project Site Access

As discussed previously in Section 2, Project Description, access to the project site would be provided via two driveways. Both driveways would be provided along Woodruff Avenue and would be approximately 40 feet wide:

- Driveway 1 (North) via Woodruff Avenue: Full access for passenger cars and inbound only (right-in/left-in) for trucks (no truck exit)
- Driveway 2 (South) via Woodruff Avenue: Full access for passenger cars and outbound only (right-out/left-out) for trucks (no truck entry)

Both driveways would lead to passenger vehicle parking lots on the northeast and southeast corners of the project site. The parking lots would be connected by a north–south through-lane, which provides additional passenger vehicle parking spaces along the eastern boundary of the site. On the west side of both parking lots would be a gated driveway leading to truck courts, truck parking stalls, and loading docks. The project would include 56 parking spaces for passenger vehicles (52 standard, 2 accessible parking, and 2 van accessible parking), 76 spaces for cargo containers, and 70 loading docks (refer to Figure 8, Site Plan).

As shown in Table 27, peak 95th percentile queues are not forecast to exceed any of the storage pocket lengths at existing intersections or at either driveway. Therefore, the project will not create a significant impact to the project driveways or adjacent intersections, and hazards due to geometric design features will be less than significant.

Caltrans Freeway Off-Ramp

Due to the potential of the project to add traffic to Caltrans facilities within the study area, the following Caltrans freeway off-ramps were analyzed for queuing impacts:

- I-605 southbound ramps/Firestone Boulevard
- I-605 northbound ramps - Hoxie Avenue/Firestone Boulevard

As shown in Table 28, peak 95th percentile queues are expected to exceed the storage pocket lengths in the following intersections and lanes:

- PM Peak Hour: I-605 southbound ramps/Firestone Boulevard (southbound left-turn lane)
  - This lane extends from the intersection to the freeway mainline, and it is expected that forecasted queues would extend past the gore point and into the mainline.
- Both AM and PM Peak Hour: I-605 northbound ramps - Hoxie Avenue/Firestone Boulevard (southbound right-turn lane)
  - This is a storage lane and adjacent lanes possess queues that are not forecast to extend to the freeway mainline.

However, when comparing the EAC scenario with the addition of the project, the forecasted queues will either not change or will be slightly reduced from the baseline condition. For the I-605 southbound ramp, approximately 45 feet of queue will be reduced with the addition of the project, approximately two vehicle car lengths. For the I-605 northbound ramps, forecasted queues are expected to remain the same with the addition of the project. Therefore, the project will not create a significant impact to the Caltrans freeway off-ramps, and hazards due to geometric design features will be less than significant.

Table 27. Existing plus Ambient Growth plus Cumulative Projects plus Project Driveway and Project Access Queuing Summary

Intersection	Movement	Pocket Length[1]	Existing plus Ambient Growth plus Cumulative Projects				Existing plus Ambient Growth plus Cumulative Project plus Project				Improvement Warranted
			AM Peak Hour		*PM Peak Hour*		*AM Peak Hour*		*PM Peak Hour*		
			95th Percentile Queue[2]	*Exceeds Turn Pocket Length?*	*95th Percentile Queue[2]*	*Exceeds Turn Pocket Length?*	*95th Percentile Queue[2]*	*Exceeds Turn Pocket Length?*	*95th Percentile Queue[2]*	*Exceeds Turn Pocket Length?*	
Woodruff Avenue/Washburn Road	SBL	125	90	No	61	No	82	No	56	No	No
	SBT[3]	175	143	No	132	No	143	No	139	No	No
	SBTR[3]	175	152	No	141	No	154	No	150	No	No
Woodruff Avenue/North Project Driveway	EBLR[4]	150	—	—	—	—	18	No	0	No	No
	NBL[5]	50	—	—	—	—	0	No	12	No	No
	SBTR[6]	200	—	—	—	—	0	No	0	No	No
Woodruff Avenue/South Project Driveway	EBLR[4]	150	—	—	—	—	79	No	48	No	No
	NBL[5]	200	—	—	—	—	0	No	0	No	No
	SBTR[6]	125	—	—	—	—	48	No	45	No	No

Source: Appendix C.
Notes: SBL = southbound left lane; SBT – southbound through lane; SBTR = southbound through-right lane; EBLR = eastbound left-right lane; NBL = northbound left lane.
1 Measured in feet.
2 Based on 95th percentile (design) queue length in SimTraffic 10.
3 Length measured to approximate distance of south project driveway.
4 Length measured according to the distance as shown on the site plan from the driveway entrance to truck parking gate.
5 Length measured as available left-turn pocket or two-way left-turn lane.
6 Length measured as distance to nearest upstream driveway.

Table 28. Existing plus Ambient Growth plus Cumulative Projects plus Project Caltrans Off-Ramp Queuing Summary

Intersection	Movement	Pocket Length[1]	Existing plus Ambient Growth plus Cumulative Projects				Existing plus Ambient Growth plus Cumulative Project plus Project				Improvement Warranted
			AM Peak Hour		*PM Peak Hour*		*AM Peak Hour*		*PM Peak Hour*		
			95th Percentile Queue[2]	*Exceeds Turn Pocket Length?*	*95th Percentile Queue[2]*	*Exceeds Turn Pocket Length?*	*95th Percentile Queue[2]*	*Exceeds Turn Pocket Length?*	*95th Percentile Queue[2]*	*Exceeds Turn Pocket Length?*	
I-605 southbound ramps/Firestone Boulevard	SBL[3]	825	160	No	1,216	**Yes**	388	No	1,171	**Yes**	No
	SBR	275	229	No	241	No	254	No	237	No	No
	SBR	275	209	No	100	No	225	No	140	No	No
I-605 northbound ramps - Hoxie Avenue/Firestone Boulevard	SBL	275	60	No	210	No	69	No	208	No	No
	SBLT[3]	2,950	2,137	No	1,281	No	2,288	No	2,307	No	No
	SBT[3]	2,950	1,985	No	1,672	No	1,930	No	2,187	No	No
	SBR[4]	210	235	**Yes**	270	**Yes**	235	**Yes**	235	**Yes**	No

Source: Appendix C.
Notes: SBL = southbound left lane; SBR – southbound right lane; SBLT = southbound through-left lane; SBT = southbound through lane.
1 Measured in feet.
2 Based on 95th percentile (design) queue length in SimTraffic 10.
3 Primary off-ramp lane; approximate length measured from freeway mainline. Length measured from stop bar to gore line at mainline.
4 While queue exceeds storage lane, the total length of the off-ramp is greater than the queue, therefore queue would not impact the mainline lanes.

d) Would the project result in inadequate emergency access?

No Impact. Site access will be provided via the two driveways located along Woodruff Avenue. Emergency vehicle access will be available at all driveways and facilitated within the entirety of the project site. The project site would be accessible to emergency responders during construction and operation of the project. Therefore, no impacts associated with an emergency response plan or emergency evacuation plan would occur.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
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:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
b) 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?	☐	☒	☐	☐

CEQA was amended in 2014 through Assembly Bill 52 (AB 52), which created a new category of "tribal culture resources" (TCRs) that must be considered under CEQA and applies to all projects that file a notice of preparation, notice of negative declaration, or MND on or after July 1, 2015. AB 52 requires lead agencies to provide notice to and begin consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of a project if that tribe has requested, in writing, to be kept informed of projects by the lead agency prior to the determination of whether a negative declaration, MND, or environmental impact report will be prepared. If a tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the tribe. AB 52 also specifies mitigation measures that may be considered to avoid or minimize impacts to tribal cultural resources. Specifically, California Public Resources Code, Section 21074, provides the following guidance:

(a) Tribal Cultural Resources are either of the following:

(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

(A) Included or determined to be eligible for inclusion in the California Register of Cultural Resources.

(B) Included in a local register of cultural resources as defined in subdivision (k) of §5020.1.

(2) 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 §5024.1. In applying the criteria set forth in subdivision (c) of §5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

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)?

Less-than-Significant Impact. No previously recorded archaeological resources of Native American origin or TCRs listed in the CRHR or a local register were identified within the project site through the South Central Coastal Information Center records or Native American coordination. Additionally, no specific, designated TCRs were identified by California Native American tribes as part of the City's AB 52 notification and consultation process (see Section 3.17(b)(ii) below for a description of this process). As such, the project would not adversely affect TCRs that are listed or eligible for listing in the state or local register. Therefore, impacts associated with TCRs listed in the CRHR or a local register would be less than significant.

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?

Less-than-Significant Impact with Mitigation Incorporated. Under CEQA, an effect to a TCR is considered a "substantial adverse change," if it is shown that the change would materially impair

the significance of the historical resource. That is, a project that demolishes or materially alters in an adverse manner those physical characteristics of a historical resource conveying its historic significance would materially impair the significance of a historical resource. Therefore, such a change would constitute a "substantial adverse change" under CEQA.

As previously mentioned, no Native American or tribal cultural resources were identified within the project site as a result of the CHRIS records search. The NAHC was contacted on August 14, 2020, for a review of their Sacred Lands File (SLF) as part of the process of identifying cultural resources within or near the project site. The NAHC replied via email on September 17, 2020, stating that the results of the SLF search were negative. Because the SLF search does not include an exhaustive list of Native American cultural resources, the NAHC also suggested contacting an additional eight Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the project site. No additional tribal outreach was conducted by Dudek; however, in compliance with AB 52, the City has contacted all NAHC-listed traditionally geographically affiliated tribal representatives that have requested project notification.

Pursuant to AB 52, lead agencies are required to notify California Native American Tribal representatives (that have requested notification) who are traditionally or culturally affiliated with the geographic area of the project. The City mailed notification letters for the project to all NAHC-listed California Native American Tribal representatives that have requested project notification pursuant to AB 52 on August 31, 2020.

As a result of the notification letters, one tribe requested consulting party status: the Gabrieleno Band of Mission Indians – Kizh Nation. The response from representative Andrew Salas of the Gabrieleno Band of Mission Indians – Kizh Nation was received on September 8, 2020. However, after several unsuccessful attempts to contact the Gabrieleno Band of Mission Indians – Kizh Nation to schedule a consultation meeting, no response has been received by the City, and consultation between the City and the Gabrieleno Band of Mission Indians – Kizh Nation has not occured to date. Given this lack of response, the City considers the AB 52 consultation process completed.

There are no TCRs within the immediate vicinity of the project site that have been determined by the City to be significant pursuant to the criteria set forth in Public Resources Code Section 5024.1. However, the Gabrieleno Band of Mission Indians – Kizh Nation's initial interest in consulting on this project suggests that there is some potential for unknown subsurface TCRs to be present in the project area. In the event that unknown subsurface TCRs are uncovered during construction ground disturbance, and such resources are not identified and avoided or properly treated, a potentially significant impact could result. However, implementation of MM-TCR-1 during project construction would reduce impacts to TCRs to below a level of significance, as it would set forth steps to ensure that that if potential TCRs are unearthed, they would be appropriately treated and preserved. Therefore, impacts would be less than significant with mitigation incorporated. No further mitigation is required.

MM-TCR-1 While no tribal cultural resources (TCRs) have been identified that may be affected by the project, the following approach for the unanticipated discovery of TCRs has been prepared to reduce potential impacts to unanticipated resources. Should a potential TCR be encountered, construction

activities near the potential TCR shall be temporarily halted within 50 feet of the potential TCR and the City of Downey (City) shall be notified. The City will notify Native American tribes that have been identified by the Native American Heritage Commission (NAHC) to be traditionally and culturally affiliated with the geographic area of the project. If the unanticipated resource is archaeological in nature, appropriate management requirements shall be implemented as outlined in mitigation measure **MM-CUL-1**. If the City determines that the potential resource is a TCR (as defined by Public Resources Code, Section 21074), tribes consulting under AB 52 would be provided a reasonable period of time, typically five days from the date a new discovery is made, to conduct a site visit and make recommendations regarding future ground disturbance activities as well as the treatment and disposition of any discovered TCRs. A qualified archaeologist shall implement a plan for the treatment and disposition of any discovered TCRs based on the nature of the resource and considering the recommendations of the tribe(s). All activities shall be conducted in accordance with regulatory requirements.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction 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?	☐	☐	☒	☐

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less-than-Significant Impact: As discussed in Section 3.10(b), the project would increase the amount of pervious surfaces on the project site by adding landscaped area. However, the majority of the project site would remain impervious surface. Pursuant to the City's Municipal Code Section 5707, the project has prepared a LID plan to comply with City efforts to retain stormwater runoff generated from new construction projects. In addition, the project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, electric power, natural gas, or telecommunication facilities for the reasons discussed below.

Water Facilities

The project would include the demolition of an existing, 74,662-square-foot industrial building and construction of an approximately 44,162-square-foot industrial building for truck terminal use. No residential use or other land uses typically associated with directly inducing population growth are included as part of the project. Additionally, as is discussed below in Section 3.19(b), the project would have sufficient water supplies during normal, dry, and multiple-dry years. The City of Downey Water Department provides domestic water to the project site. The project would connect to an existing 12-inch-diameter water line in Woodruff Avenue for domestic and irrigation purposes (Figure 12, Existing Utilities). Therefore, impacts associated water facilities would be less than significant.

Wastewater Treatment Facilities

The City is located within the jurisdictional boundaries of the Sanitation Districts of Los Angeles County, District No. 2. The County Sanitation District operates 11 wastewater treatment facilities, 10 of which are classified as water reclamation plants. Wastewater generated by the City is treated at the JWPCP located in the City of Carson, which has a design capacity of 385 million gallons per day (mgd) and currently processes an average flow of 321.6 mgd, and the Los Coyotes WRP located in the City of Cerritos, which has a design capacity of 37.5 mgd and currently processes an average flow of 32 mgd (City of Downey 2004).

Under existing conditions, the project site supports an industrial building and contributes to the overall wastewater generated within the City. As such, the project site would connect to an existing 21-inch-diameter sewer line in Woodruff Avenue for sewage conveyance purposes (Figure 12, Existing Utilities). Upon completion of construction, the project would be smaller than the existing onsite building and would employee fewer workers. Thus, wastewater generated by the project is expected to be less than produced under existing conditions. Therefore, impacts associated wastewater treatment facilities would be less than significant.

Stormwater Drainage Facilities

As discussed in Section 3.10(b), the project site is developed and is composed entirely of impervious surfaces. Stormwater collected from on the existing building's roof drains towards the southwest portion of the project site and is conveyed through the site south of the project site, where it is discharged into an existing storm drain within Washburn Road via a parkway culvert. Runoff from the vehicle parking lot and the landscaped area fronting Woodruff Avenue sheet flows toward the street, where it then drains via a

parkway culvert located at the southeast portion of the site into an existing 36-inch public storm drain within Woodruff Avenue.

As part of the project, the project site would be graded so that stormwater collected via the building's roof and parking areas would be collected by concrete catchbasins and conveyed via underground pipes to an underground stormwater detention chamber and proprietary biofiltration system (Figure 13, Proposed Storm Drain System). The biofiltration system would utilize plants and soil media to treat stormwater before ultimately being discharged into the adjacent existing 36-inch public storm drain system within Washburn Road via an underdrain system and sump pump. Furthermore, because the project site is located on level or gently sloping topography and is surrounded by urban land uses, the project is not anticipated to substantially modify existing topography or runoff patterns. Therefore, impacts associated with stormwater drainage facilities would be less than significant.

Natural Gas and Electric Service

Southern California Gas Company would provide natural gas service to the project site. The project would connect to an existing 4-inch-diameter underground gas line within Woodruff Avenue (Figure 12, Existing Utilities). Therefore, impacts associated with natural gas facilities would be less than significant.

Electric Power Facilities

Southern California Edison would provide electric service. The project would connect to existing overhead electrical lines on the west side of project site by undergrounded electric lines (Figure 12, Existing Utilities). Therefore, impacts associated with electrical power facilities would be less than significant.

Telecommunications Facilities

The City of Downey is served by multiple telephone service providers. Since the project site is in an urbanized area and is surrounded by other industrial uses, there are existing telecommunication facilities that would be able to serve the project site. Furthermore, an existing overhead telephone line located within Woodruff Avenue is located adjacent to the project site (Figure 12, Existing Utilities). Once the project is completed, future employees would be able to connect to existing telecommunication services without the need for expansion or construction of new facilities. Therefore, impacts associated with telecommunications facilities would be less than significant.

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less-than-Significant Impact: As discussed in Section 3.10(b), Hydrology and Water Quality, the City produces groundwater from the Central Basin. The Central Basin is located in Los Angeles County, approximately 20 miles southeasterly of downtown Los Angeles. Groundwater in the Central Basin provides a substantial portion of the water supply needed by residents and industries in the overlying area.

In the Central Basin Judgment of 1965 (Central Basin Judgment), the Superior Court fixed allowable withdrawals from the Central Basin at a level that was greater than the amount of water returned to the Central Basin through natural replenishment. The City was one of the original parties involved in the Central Basin Judgment and has acquired additional water rights since that time, resulting in an APA of 16,554

AFY. The City owns wells, 20 of which are currently operational and have a combined pumping capacity of approximately 27,575 gallons per minute, or approximately 44,500 AFY if operated continuously (City of Downey 2018).

In December 2013, the Supreme Court approved amendments to the Central Basin Judgment which implemented a water storage program. The Amended Central Basin Judgment states, a party may store up to 50% of the party's APA in an Individual Storage Account and 150% of the party's APA in a Community Storage Account if space is available. In addition, the amendments allow parties to convert unused APA to stored water and revised the amount of carryover to be equal to 60% of the party's APA minus the amount of carryover water set aside for storage. The purpose of the storage program creates an added reliability in water supply from the Central Basin. In addition, the amendments allow for transfer of water between Central Basin and West Basin by permitting parties with water rights in Central Basin to increase production in Central Basin, while another party decreases production in West Basin by the corresponding amount. Under the Central Basin Judgment, water rights are fixed and do not vary year to year. Water producers cannot exceed their water rights by more than 20% or 20 acre-feet, whichever is greater, in any year and an adjustment is made the following year (City of Downey 2018).

Additionally, the 2014 Sustainable Groundwater Management Act directed DWR to establish initial groundwater basin priorities for the basins identified and defined in DWR's Bulletin 118. DWR finalized the basin prioritization in June 2014 through the CASGEM program. The CASGEM basin prioritization program is being used by DWR to focus resources towards implementing legislation to require all groundwater basins be monitored for seasonal and long-term groundwater elevation trends. DWR plans to evaluate the status of groundwater level monitoring in "High" or "Medium" priority groundwater basins. If DWR determines that groundwater levels in all or part of a High or Medium Priority basin are not being monitored, DWR will work cooperatively with local entities to establish a monitoring program. Compliance with DWR requirements allows the basin monitoring entities to be eligible to receive state water grants or loans (City of Downey 2018).

Furthermore, as a water purveyor, the City must be able to provide for the minimum health and safety water requirements of the community at all times. Following the adoption of its Water Shortage Contingency Plan, Ordinance No. 925, the City developed a four-stage water-rationing plan to be implemented during declared water shortages. The four-stage water-rationing plan includes both voluntary and mandatory rationing, which are to be implemented depending on the causes, severity, and anticipated duration of the water supply shortage. The four-stage water-rationing plan is designed to allow for a minimum of 50% of the City's normal supply to be available during a severe or extended water shortage. Rationing program triggering levels were established to ensure that this goal is met. Rationing stages are triggered by a supply shortage due to drought conditions, contamination of one or a combination of sources, or some other type of emergency (City of Downey 2018).

The City's 2015 Urban Water Management Plan provides normal-year, single-dry-year, and multiple-dry-year supply and demand analysis for the City's domestic water service area. Table 29 shows the supply and demand of domestic water for a normal year.

Table 29. Supply and Demand Comparison – Normal Year

	2020	2025	2030	2035	2040
Supply totals	18,715	19,430	19,761	20,097	20,439

Demand totals	18,715	19,430	19,761	20,097	20,439
Difference	0	0	0	0	0

Source: City of Downey 2018.

Table 30 shows the supply and demand of domestic water for a single-dry year.

Table 30. Supply and Demand Comparison – Single-Dry Year

	2020	2025	2030	2035	2040
Supply totals	17,218	17,876	18,180	18,489	18,804
Demand totals	17,218	17,876	18,180	18,489	18,804
Difference	0	0	0	0	0

Source: City of Downey 2018.

Table 31 shows the supply and demand of domestic water for multiple-dry-years.

Table 31. Supply and Demand Comparison – Multiple-Dry-Year Events

Scenarios	Supply and Demand	2020	2025	2030	2035	2040
Multiple-dry-year first-year supply	Supply totals	17,218	17,876	18,180	18,489	18,804
	Demand totals	17, 218	17,876	18,180	18,489	18,804
	Difference	0	0	0	0	0
Multiple-dry-year second-year supply	Supply totals	17,592	18,264	18,575	18,891	19,213
	Demand totals	17,592	18,264	18,575	18,891	19,213
	Difference	0	0	0	0	0
Multiple-dry-year third-year supply	Supply totals	17,592	18,264	18,575	18,891	19,213
	Demand totals	17,592	18,264	18,575	18,891	19,213
	Difference	0	0	0	0	0

Source: City of Downey 2018.

As shown in Tables 29, 30, and 31, the City's supplies can meet demands during normal, single-dry, and multiple-dry years for the next 20 years. Because the City's water demands can be met under normal, single-dry, and multiple-dry years, and because supply would meet projected demand due to conservation measures, the project's water demands would be served by the City's projected current and future supplies. Therefore, the project would have sufficient water supplies available during normal, single-dry, and multiple-dry years. Thus, impacts would be less than significant.

c) Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less-Than-Significant Impact: A significant impact would occur if the wastewater treatment provider indicates that a project would increase wastewater generation to such a degree that the capacity of the facilities currently serving the project site would be exceeded. Wastewater generated by the City would be treated at the JWPCP located in the City of Carson. JWPCP has a design capacity of 385 mgd and currently processes an average flow of 321.6 mgd. Additionally, wastewater would be treated by the Los Coyotes WRP located in the City of Cerritos. WRP has a design capacity of 37.5 mgd and currently processes an

average flow of 32 mgd (City of Downey 2004). Under existing conditions, the project site supports an industrial building and contributes to the overall wastewater generated within the City. Upon completion of construction, the project would be smaller than the existing on-site building and would employee fewer workers. Thus, wastewater generated by the project is expected to be less than produced under existing conditions. As such, wastewater generated by the project would be accounted for in the JWPCP and WRP average dry-weather flow capacity and average wastewater flow. Therefore, impacts associated with wastewater treatment capacity would be less than significant.

d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less-than-Significant Impact: A significant impact may occur if a project were to increase solid waste generation to such a degree that existing and projected landfill capacities would be insufficient to accommodate the additional solid waste.

The project involves the demolition of an existing, 74,662-square-foot industrial building and construction of an approximately 44,162-square-foot industrial building for truck terminal use. As such, under existing conditions, the site contributes to the overall waste generated in the City. However, upon completion of construction, the project would be smaller than the existing on-site building and would employ fewer workers. Thus, it is anticipated that waste generated by the project would be less than produced under existing conditions.

The City's residents and businesses produce approximately 80,500 tons of waste per year. Thus, the City must remain committed to waste reduction, diversion, and recycling. Large quantities of waste generated by the City have been placed in local landfills, particularly the Puente Hills landfill in the City of Whittier. With the Puente Hills landfill nearing capacity and the closure of other landfills in Los Angeles County, there is a trend to transport waste to landfills further away, particularly to the Frank R. Bowerman landfill in the City of Irvine. This trend is expected to continue as more waste would have to be transported to landfills located farther away, such as the remote areas of Riverside and San Bernardino Counties. The impact on residents, property owners, and businesses would be increased service fees to cover the costs of transporting waste longer distances.

The City has implemented programs to reduce the amount of waste generated as well as reducing the amount of wastestream sent to landfills by diverting items in the wastestream that may be recycled or reused. In 1990, the City adopted a source reduction and recycling program in conformance with state legislation (AB 1290). In 1996, Downey Area Recycling and Transfer facility was constructed as a materials recovery facility where the solid waste collected from Downey and other communities is sorted for recyclable and usable materials. Waste that cannot be reclaimed is then transported to landfills. The programs have increased the amount of solid wastestream diverted from the landfills from 20% in 1990 to 48% in 2001, but has remained constant since then. Although the diversion rate is short of the 50% target mandated by state law, the increases in the amount of materials recycled are significant. To continue efforts towards increasing the amount of wastestream that is diverted and recycled, public information is provided to continually remind residents and businesses of the importance of recycling (City of Downey 2005). Therefore, impacts associated with landfill capacity would be less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less-than-Significant Impact: All collection, transportation, and disposal of solid waste generated by the project would comply with all applicable federal, state, and local statutes and regulations. In particular, AB 939, the Integrated Waste Management Act of 1989, requires that at least 50% of solid waste generated by a jurisdiction be diverted from landfill disposal through source reduction, recycling, or composting. Regional agencies, counties, and cities are required to develop a waste management plan that would achieve a 50% diversion from landfills (California Public Resources Code, Section 40000 et seq.). Residents of the City currently use curbside recyclables and green waste containers to increase diversion (City of Downey 2004). Furthermore, as mentioned in 3.19(d), solid waste generated by the project would not generate waste in excess of state or local standards. Therefore, impacts associated with solid waste disposal regulations would be less than significant.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
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?	☐	☐	☒	☐

CAL FIRE is responsible for designating fire hazard severity zones (FHSZs) within the State Responsibility Areas throughout California. FHSZs are geographical areas with an elevated risk for wildfire hazard. The State Responsibility Areas are the areas for which the state assumes financial responsibility for fire suppression and protection. CAL FIRE

also creates recommended maps for very high FHSZs within the Local Responsibility Areas, which are then adopted, or modified and adopted, by local jurisdictions. Development within a State Responsibility Area is required to abide by specific development and design standards. A review of CAL FIRE's FHSZ maps and data revealed that the project site is not located within a State Responsibility Area or a very high FHSZ (CAL FIRE 2007).

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less-than-Significant Impact: The project site is currently developed and is located in a highly urbanized setting. The project would not be located in or near a State Responsibility Areas or lands classified as very high FHSZs. According to CAL FIRE'S Fire Hazard Severity Zone Map, the project site is not located in an area identified as being susceptible to wildland fire (CAL FIRE 2007). Furthermore, the project site is surrounded by existing development in an urbanized portion of the City away from any wildland-urban interface. Therefore, impacts, including direct and indirect impacts, associated with wildfires would be less than significant.

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

Less-than-Significant Impact: Refer to response provided in Section 3.20(a).

c) Would the project 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: Refer to response provided in Section 3.20(a).

d) Would the project 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?

Less-than-Significant Impact: Refer to response provided in Section 3.20(a).

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
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?

Less-than-Significant Impact with Mitigation Incorporated: As previously discussed in Section 3.4, Biological Resources, the project would result in no impacts to vegetation, riparian, wetland habitat, and other sensitive natural communities, jurisdictional areas, movement of any native resident or migratory fish or wildlife species, tree preservation ordinance, or habitat management plans. With implementation of MM-BIO-1, the project would result in less-than-significant impacts regarding special-status wildlife.

As further addressed in Section 3.5, Cultural Resources, impacts to historic/built environment resources would be adversely affected by the project, although potential impacts regarding inadvertent discovery of

cultural resources could occur during construction of the project. However, implementation of MM-CUL-1 would ensure that impacts would be less than significant.

As discussed in Section 3.18, Tribal Cultural Resources, the project is subject to compliance with AB 52 (California Public Resources Code, Section 21074), which requires consideration of impacts to tribal cultural resources as part of the CEQA process. AB 52 requires the City, as the lead agency responsible for CEQA compliance for the project, to notify any groups (who have requested notification) of the project who are traditionally or culturally affiliated with the geographic area of the project.

In accordance with AB 52, on August 31, 2020, the City sent notification letters to the tribal representatives that have formally requested such notice under AB 52. As discussed in Section 3.19, no tribes entered into consultation, and no TCRs were identified on the project site. Notwithstanding, implementation of MM-CUL-1 and MM-TCR-1 would ensure the protection and preservation of TCRs if they were unexpectedly discovered. Therefore, with incorporate of mitigation, impacts associated with TCRs would be less than significant.

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)?

Less-than-Significant Impact with Mitigation Incorporated: As provided in the analysis in this MND, the project would not result in significant impacts to aesthetics, agriculture and forestry resources, air quality, energy, geology and soils, GHG emissions, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, transportation, utilities and service systems, and wildfire. Mitigation measures recommended for biological resources, cultural resources, geology and soils (paleontological resources), hazards and hazardous materials, noise, and tribal cultural resources would reduce impacts to below a level of significance.

The project could incrementally contribute to cumulative impacts for projects occurring within the City. However, with incorporation of mitigation identified herein, implementation of the project would not result in any residually significant impacts that could considerably contribute to a cumulative impact. In the absence of residually significant impacts, the incremental accumulation of effects would not be cumulatively considerable, and thus, the project's contribution to cumulative impacts would be less than significant.

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

Less-than-Significant Impact with Mitigation Incorporated: The potential for adverse direct or indirect impacts to human beings was considered throughout this MND. Based on this evaluation, with incorporated of mitigation outlined herein, there is no substantial evidence that construction or operation of the project would result in a substantial adverse effect on human beings.

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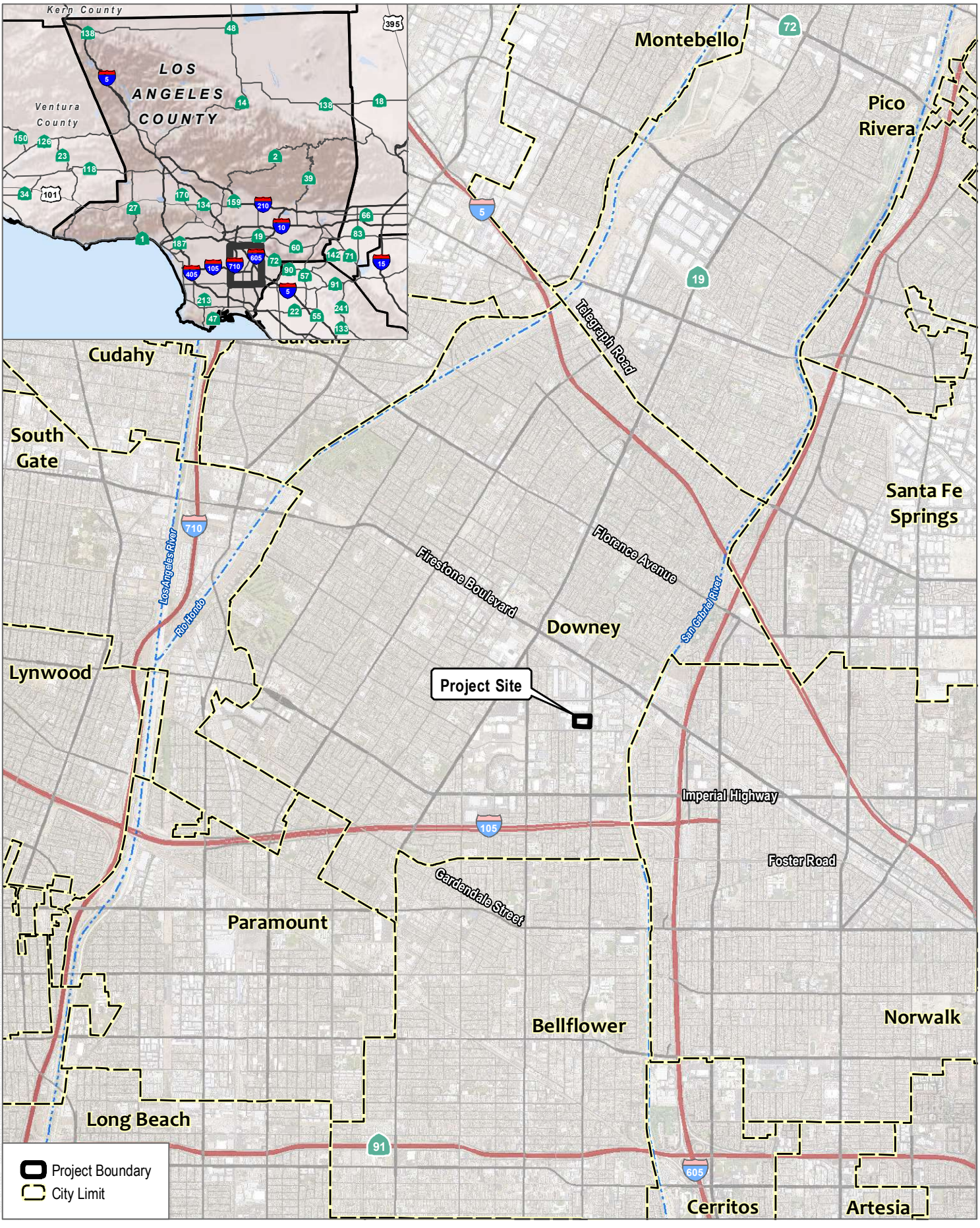
4.2 List of Preparers

City of Downey

Alfonso Hernandez, Planner

Dudek

Collin Ramsey, Project Manager
Patrick Cruz, Environmental Analyst
Lilli Martin, Environmental Analyst
Nicholas Lorenzen, Air Quality Specialist
David Larocca, Air Quality Specialist
Samantha Murray, Historic Resources Specialist
Linda Kry, Cultural Resources Specialist
Michael Greene, Acoustician
Dennis Pascua, Transportation Planner
Mladen Popovic, Transportation Planner
Carrie Kubacki, GIS and Graphics
Amy Seals, Technical Editing
Felisa Pugay, Formatting



SOURCE: USDA NAIP 2016; Open Street Map 2019; USGS NHD 2020

DUDEK

0 2,625 5,250 Feet

FIGURE 1

Project Location

12021 Woodruff Avenue Industrial Building Project

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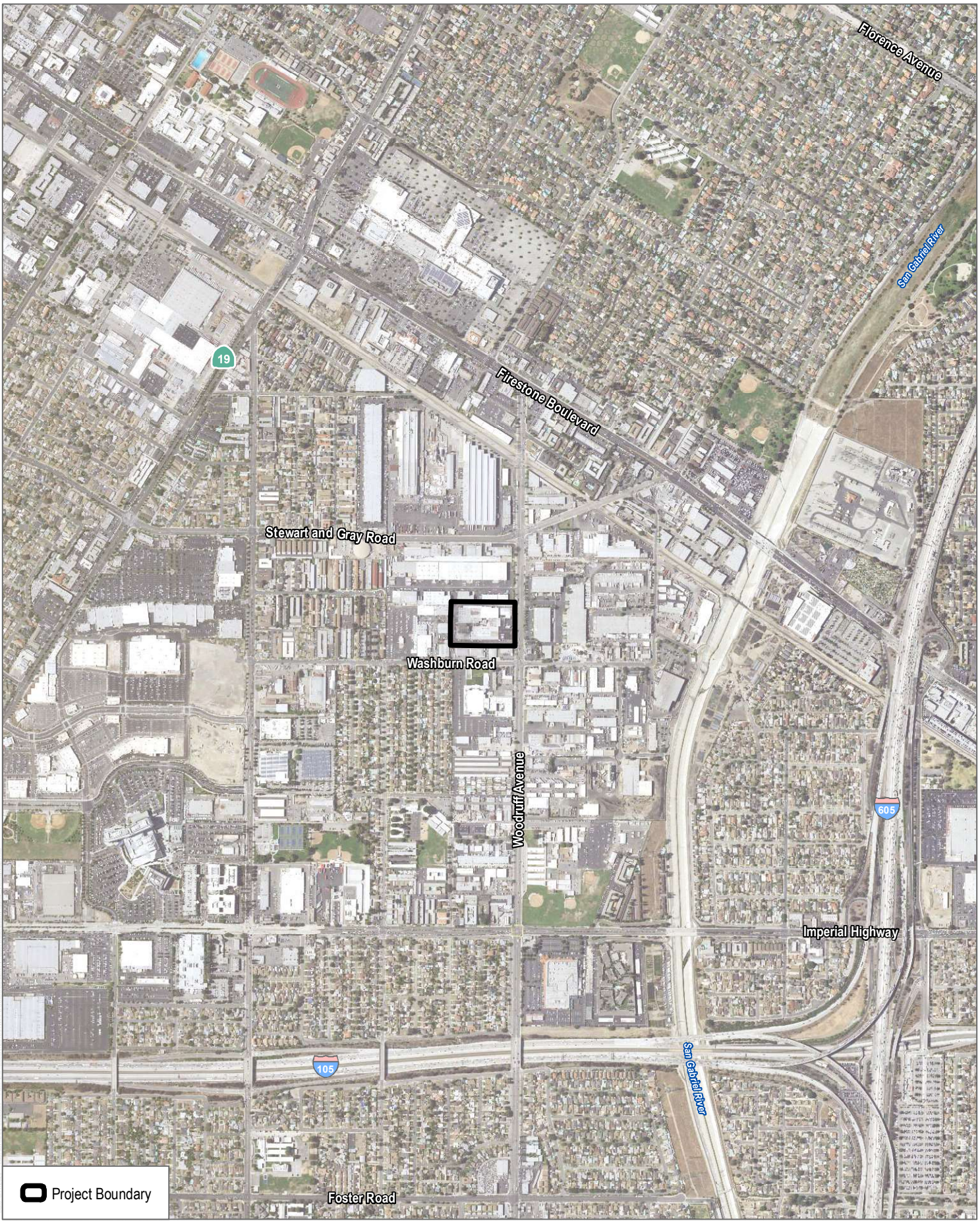

SOURCE: USDA NAIP 2016; Open Street Map 2019; USGS NHD 2020

DUDEK

0 625 1,250 Feet

FIGURE 2

Vicinity Map

12021 Woodruff Avenue Industrial Building Project

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SOURCE: Bing Maps 2020; Open Street Map 2019

DUDEK

0 50 100 Feet

FIGURE 3

Project Aerial

12021 Woodruff Avenue Industrial Building Project

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Photograph A View of the Project Site looking south from Woodruff Avenue.

Photograph B View of the Project Site looking east from Woodruff Avenue towards the front office.

Photograph C View of the Project Site looking east from Woodruff Avenue towards Driveway 1.

Photograph D View of the Project Site looking east from Woodruff Avenue towards Driveway 2.

SOURCE: Dudek 2020

FIGURE 4

Existing Site Photographs

12021 Woodruff Avenue Industrial Building Project

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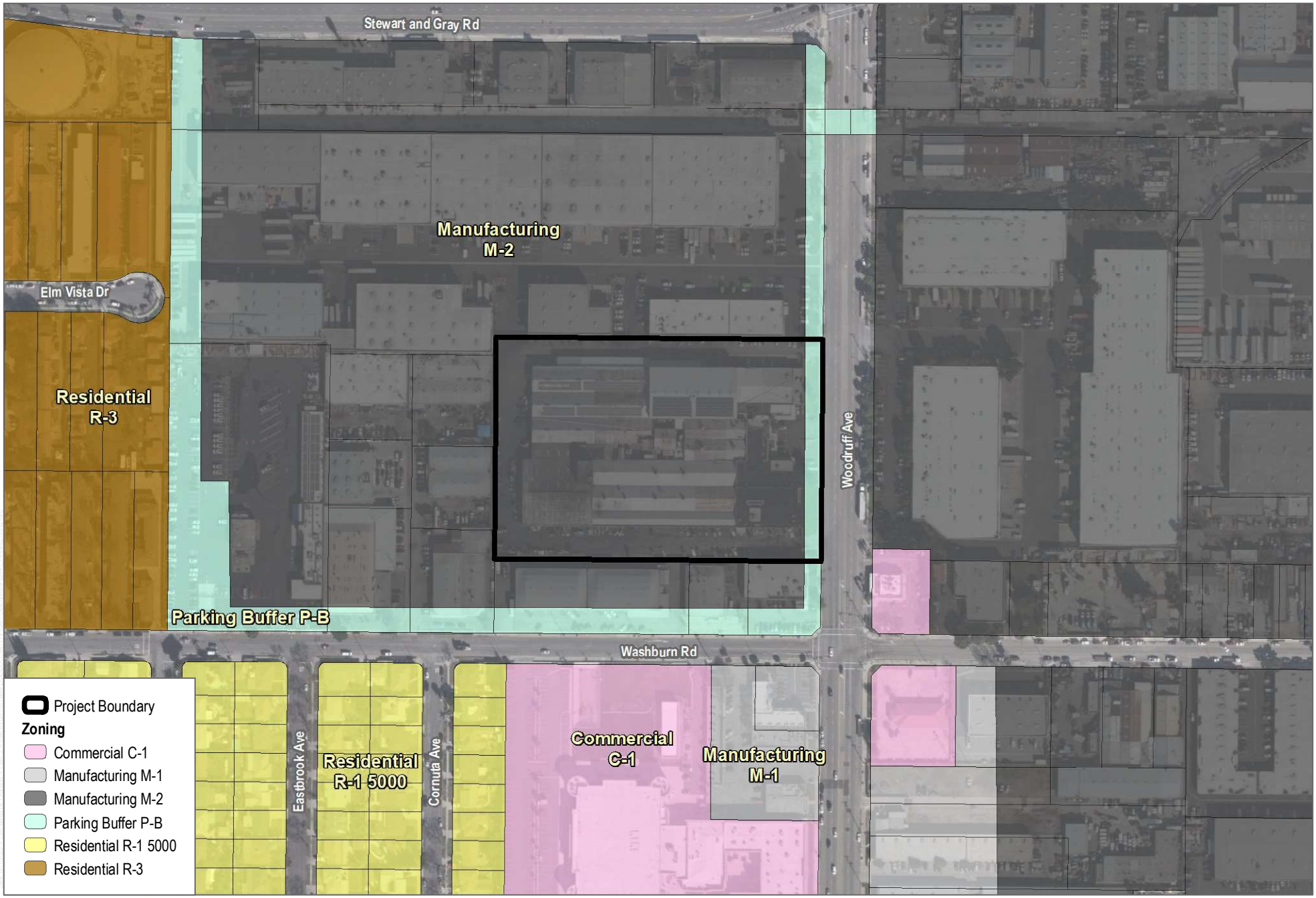

SOURCE: Bing Maps 2020; Open Street Map 2019; City of Downey 2012

DUDEK

0 125 250 Feet

FIGURE 5

Existing Zoning

12021 Woodruff Avenue Industrial Building Project

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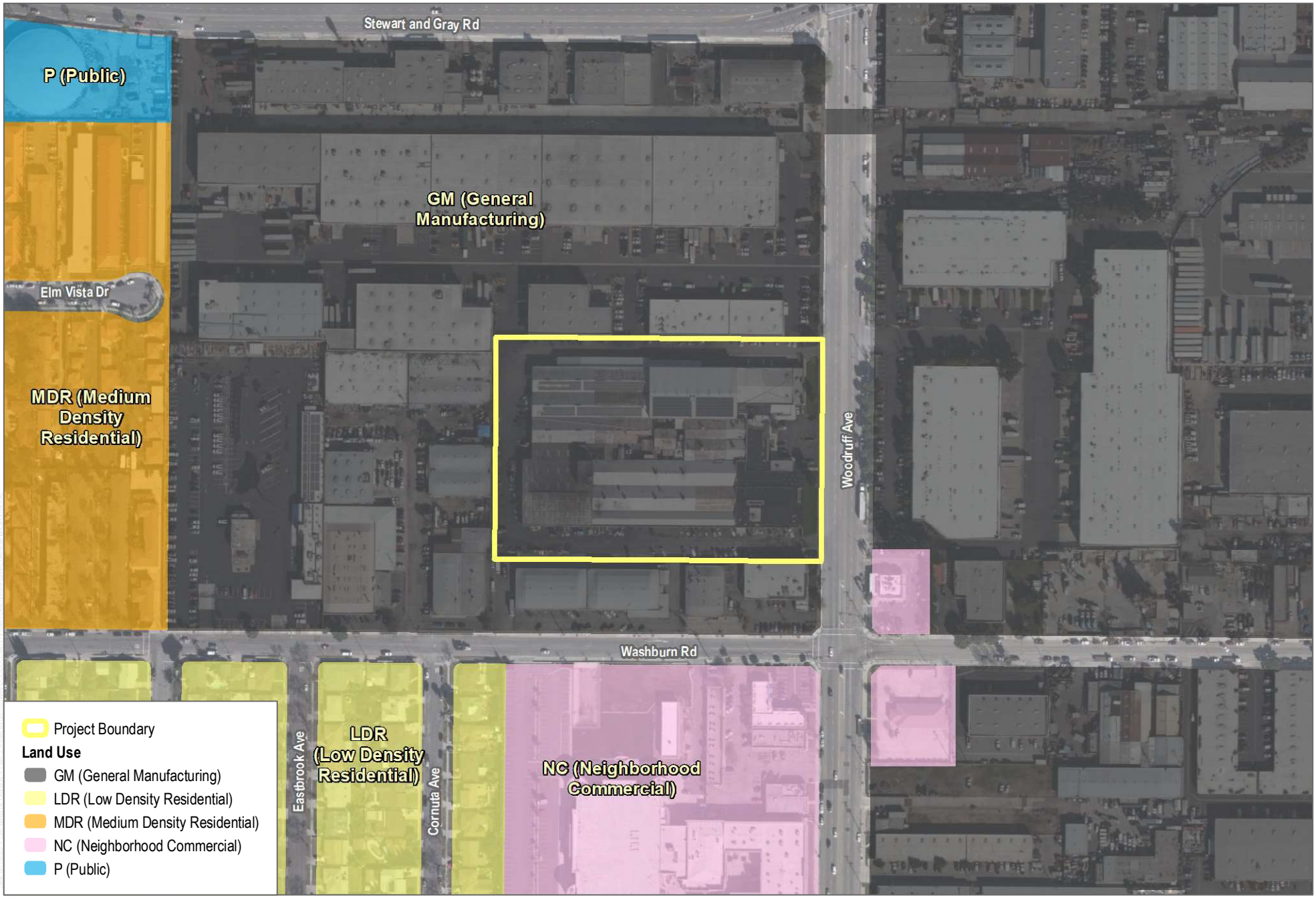

SOURCE: Bing Maps 2020; Open Street Map 2019; City of Downey 2012

DUDEK

0 125 250 Feet

FIGURE 6

General Plan Land Use Designation

12021 Woodruff Avenue Industrial Building Project

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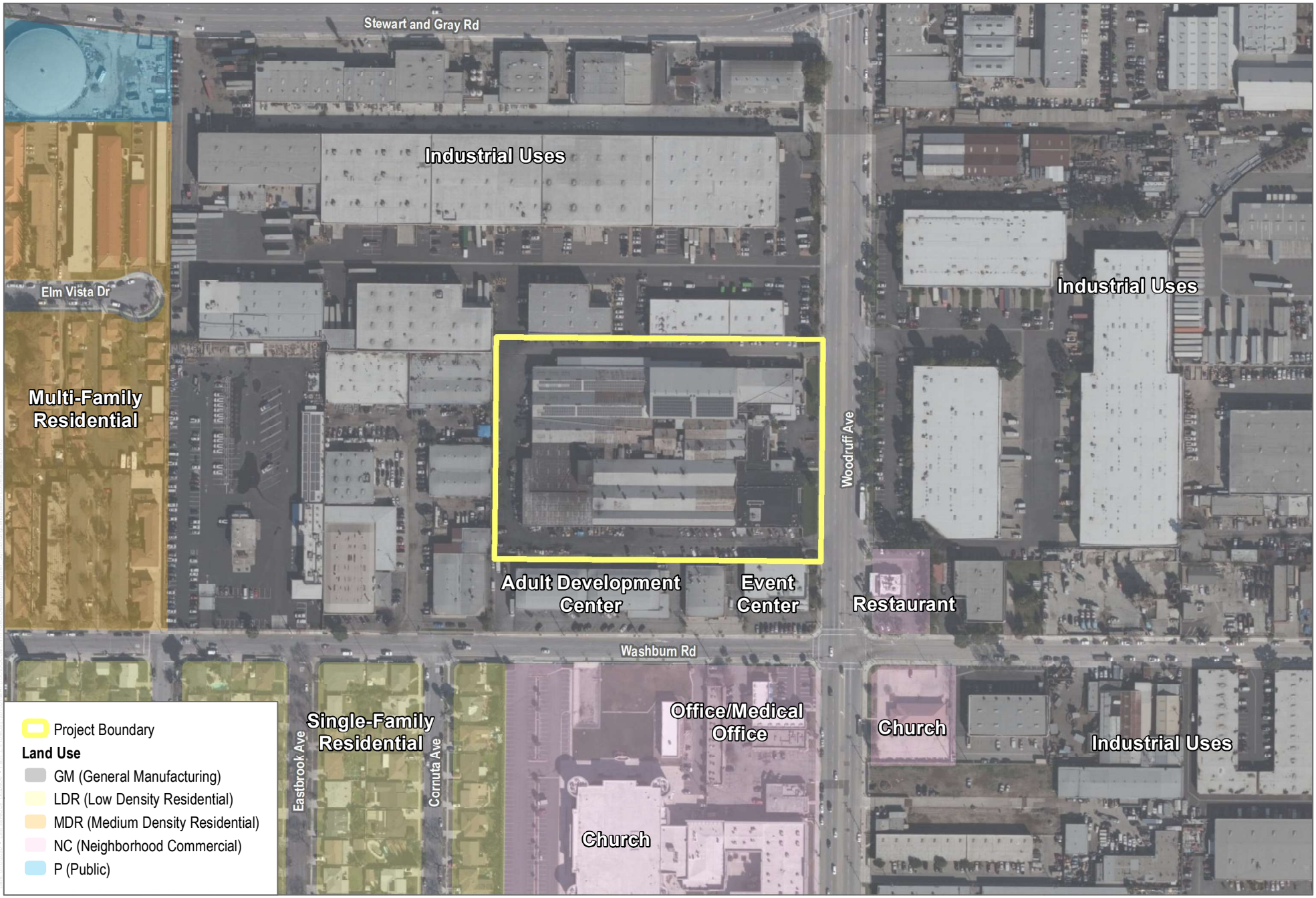

SOURCE: Bing Maps 2020; Open Street Map 2019; City of Downey 2012

DUDEK

0 125 250 Feet

FIGURE 7

Surrounding Land Uses and General Plan Land Use Designations

12021 Woodruff Avenue Industrial Building Project

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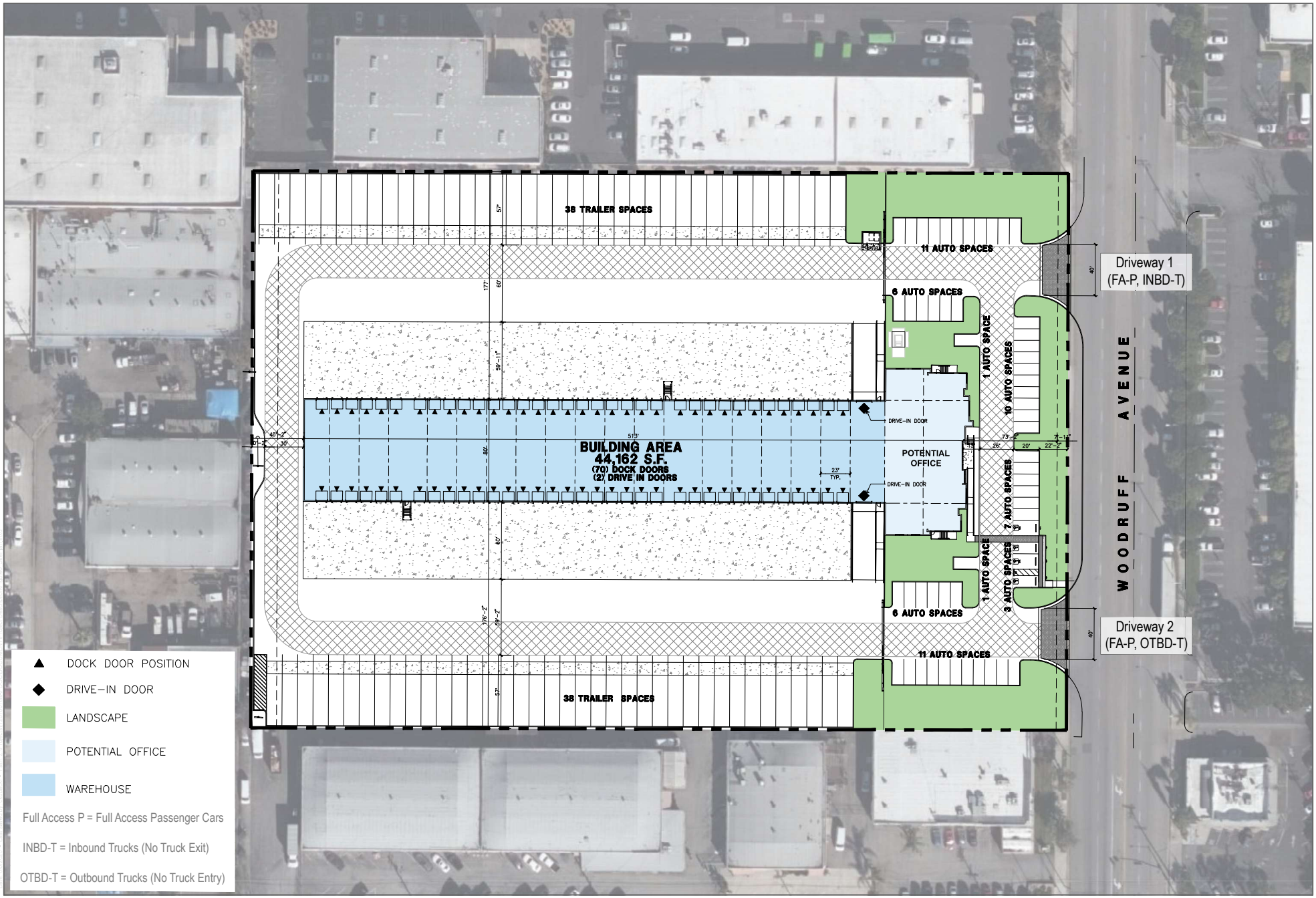

SOURCE: Bing Maps 2020; Open Street Map 2019; HPA Architecture 2020

DUDEK

0 50 100 Feet

FIGURE 8

Site Plan

12021 Woodruff Avenue Industrial Building Project

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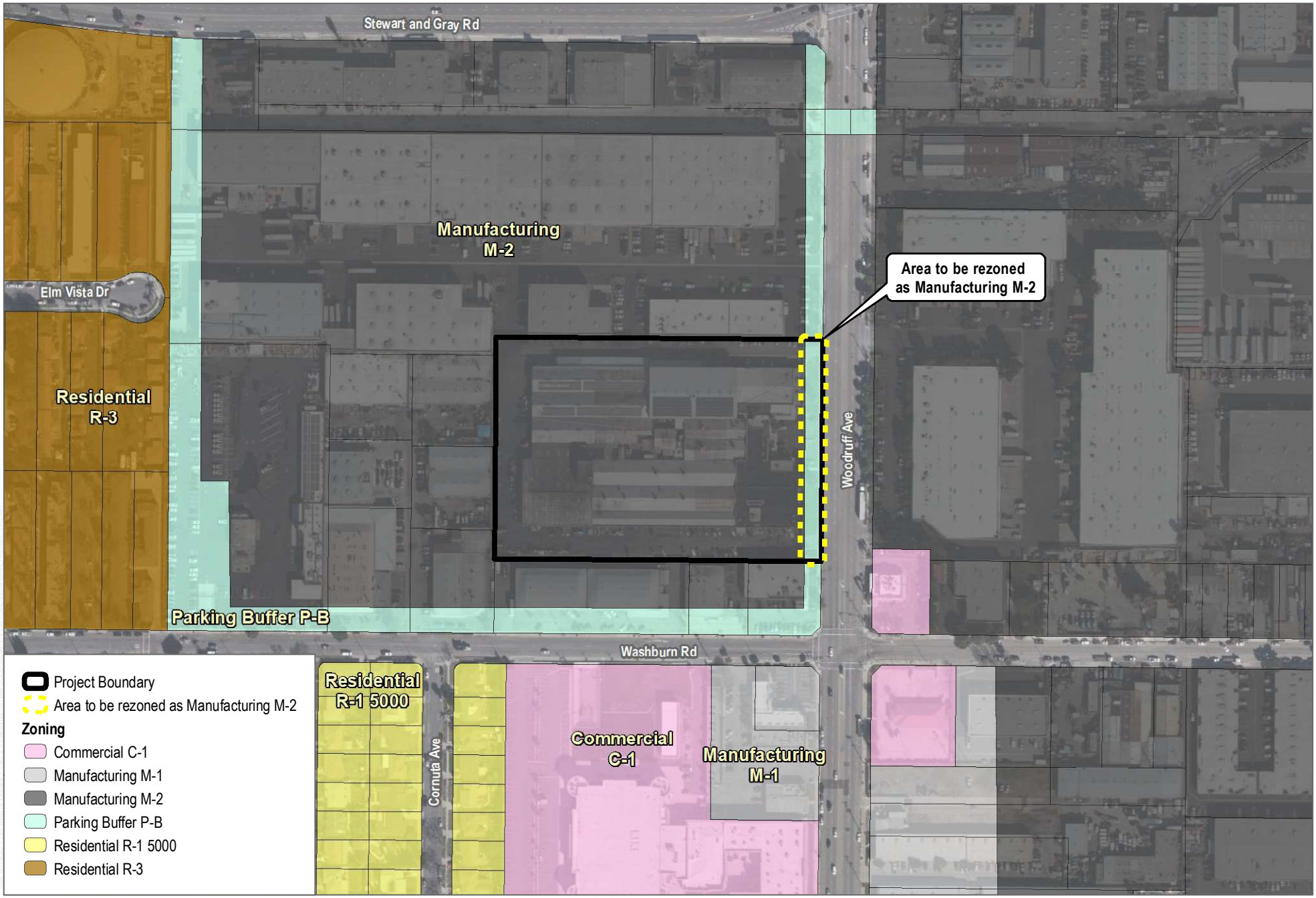

SOURCE: Bing Maps 2020; Open Street Map 2019; City of Downey 2012

DUDEK

0 125 250 Feet

FIGURE 9

Proposed Zoning

12021 Woodruff Avenue Industrial Building Project

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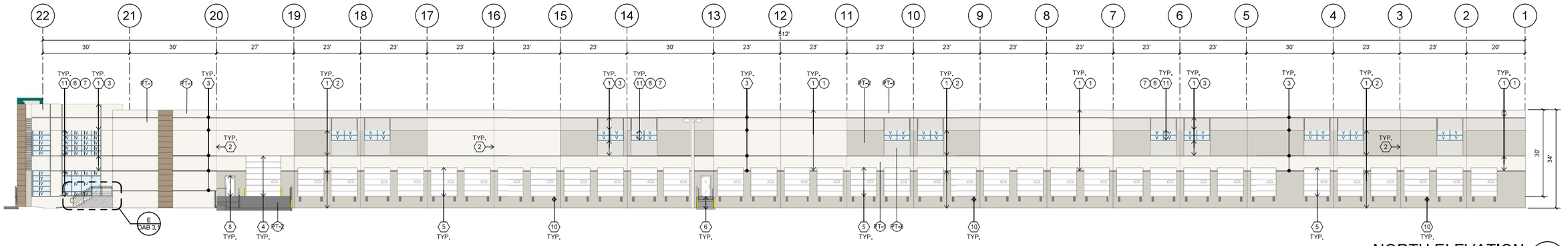
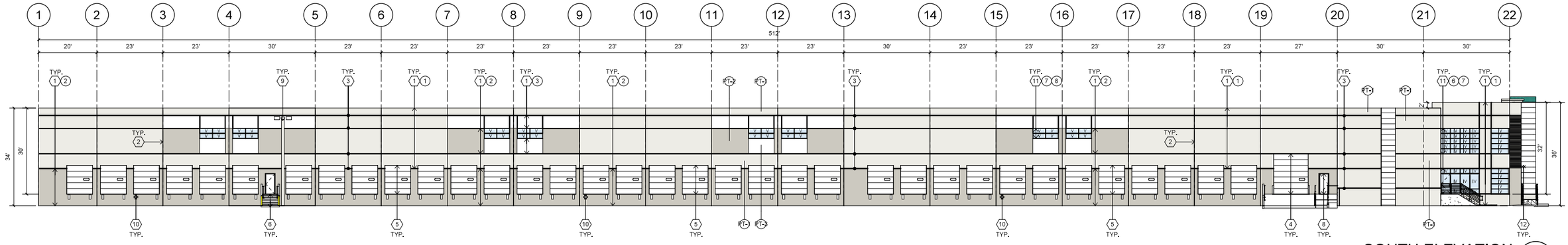


NORTH ELEVATION
scale: 1/16" = 1'-0"

A



SOUTH ELEVATION
scale: 1/16" = 1'-0"

B

SOURCE: HPA Architecture 2019

FIGURE 10A

Architectural Elevations (North and South)

12021 Woodruff Avenue Industrial Building Project

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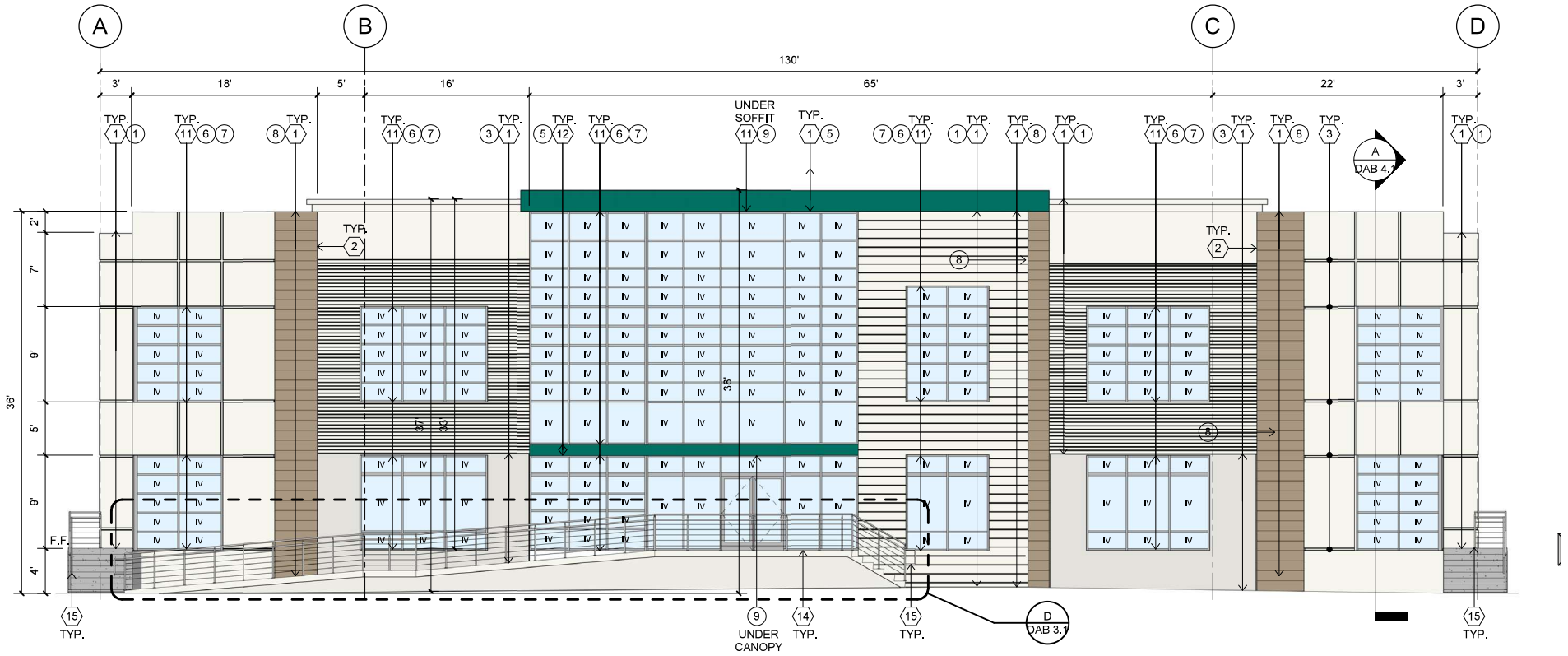

EAST ELEVATION - ENLARGED

scale: 1/8" = 1'-0"

F

SOURCE: HPA Architecture 2019

DUDEK

FIGURE 10B

Architectural Elevations (East)

12021 Woodruff Avenue Industrial Building Project

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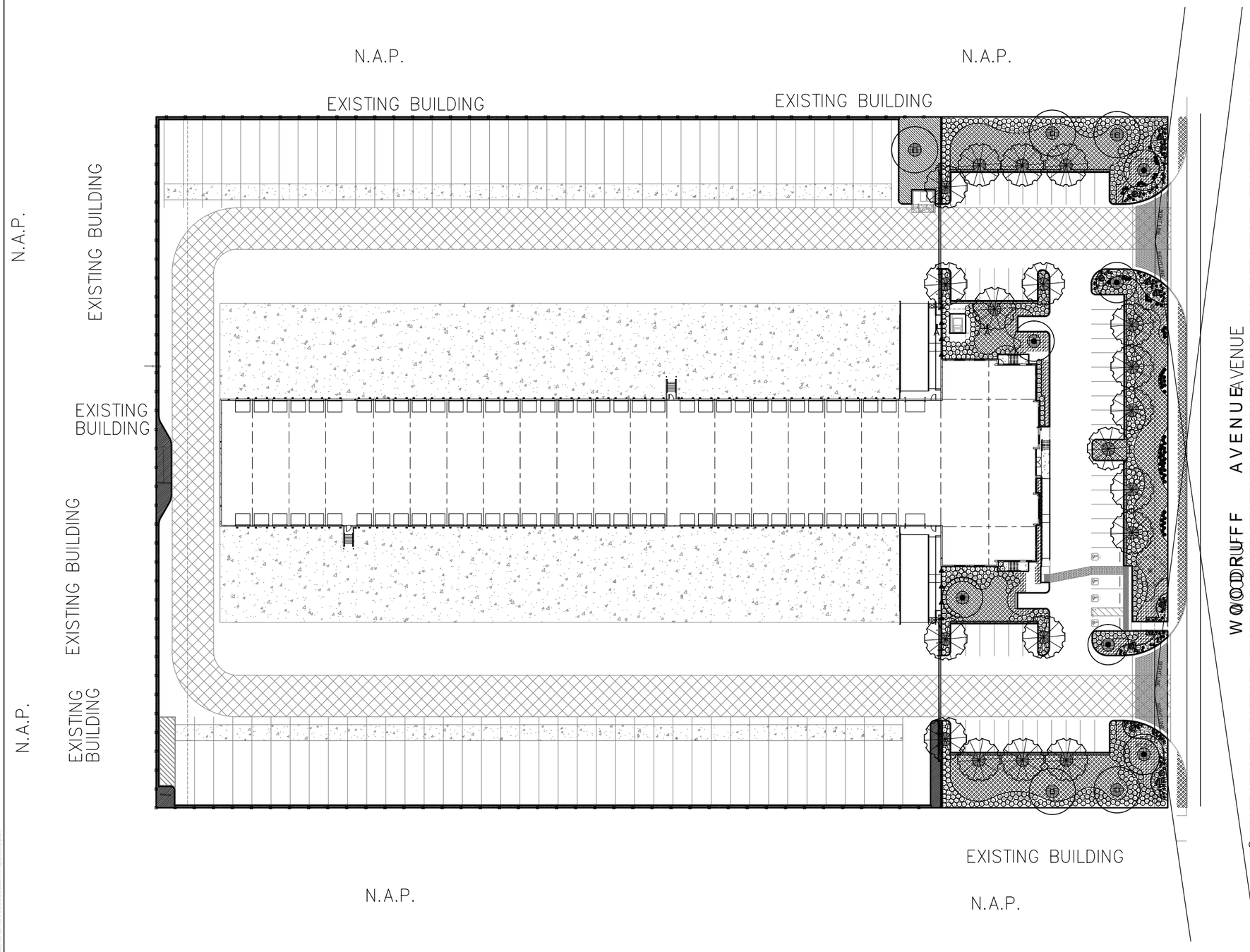


PLANTING LEGEND

TREES

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Cercidium 'Desert Museum' Blue Palo Verde	36" Box 48" Box	3 3	L	Multi
	Chitalpa tashkentensis Chitalpa	24" Box	19	L	Standard
	Rhus lancea African Sumac	15 Gal	5	L	Standard

SHRUBS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Callistemon 'Little John' Dwarf Bottle Brush	5 Gal	383	M	
	Ligustrum j. Texanum Texas Privet	5 Gal	310	M	

ACCENTS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Agave 'Blue Flame' Blue Flame Agave	5 Gal	27	L	
	Echeveria 'Afterglow' Aftergow Echeveria	1 Gal	112	L	
	Hemerocallis hybridus-Yellow Yellow Day Lily	1 Gal	65	L	

GROUNDCOVER

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Acacia redolens 'Low Boy' Dwarf Acacia	1 Gal	270	L	
	Carex pansa California Meadow Sedge	4" Pots	1,300	M	
	Carissa m. 'Green Carpet' Prostrate Natal Plum	1 Gal	728	M	

VINES

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Parthenocissus tricuspidata Boston Ivy	1 Gal	8	L	

2" layer shredded organic mulch in shrub areas, 1" layer in groundcover areas.

3/4" crushed rock decorative rock -Desert Gold. 3" layer over filter fabric.

4' boulders Desert Gold, available from Southwest Boulder. Bury ⅓ of boulder in ground. - xx total

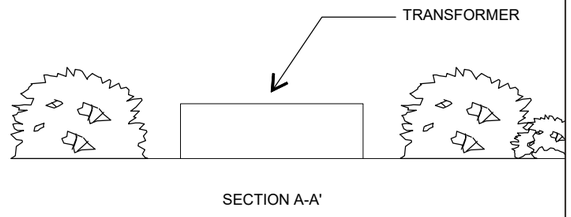
5' boulders Desert Gold, available from Southwest Boulder. Bury ⅓ of boulder in ground - xx total

Concrete mow curb, see Planting Detail sheet

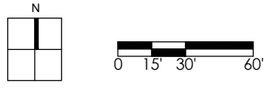
3" layer crushed rock over filter fabric.

Irrigation System will comply with standards

Total Landscape Area: 27,511 SF
Parking Area: 28,540 SF
Parking Landscape Area (Required): 2,854 SF (10%)
Parking Landscape Area (Provided): 20,804 SF (37%)



SECTION A-A'



SOURCE: Hunter Landscape 2017

FIGURE 11

Landscape Plans

12021 Woodruff Avenue Industrial Building Project

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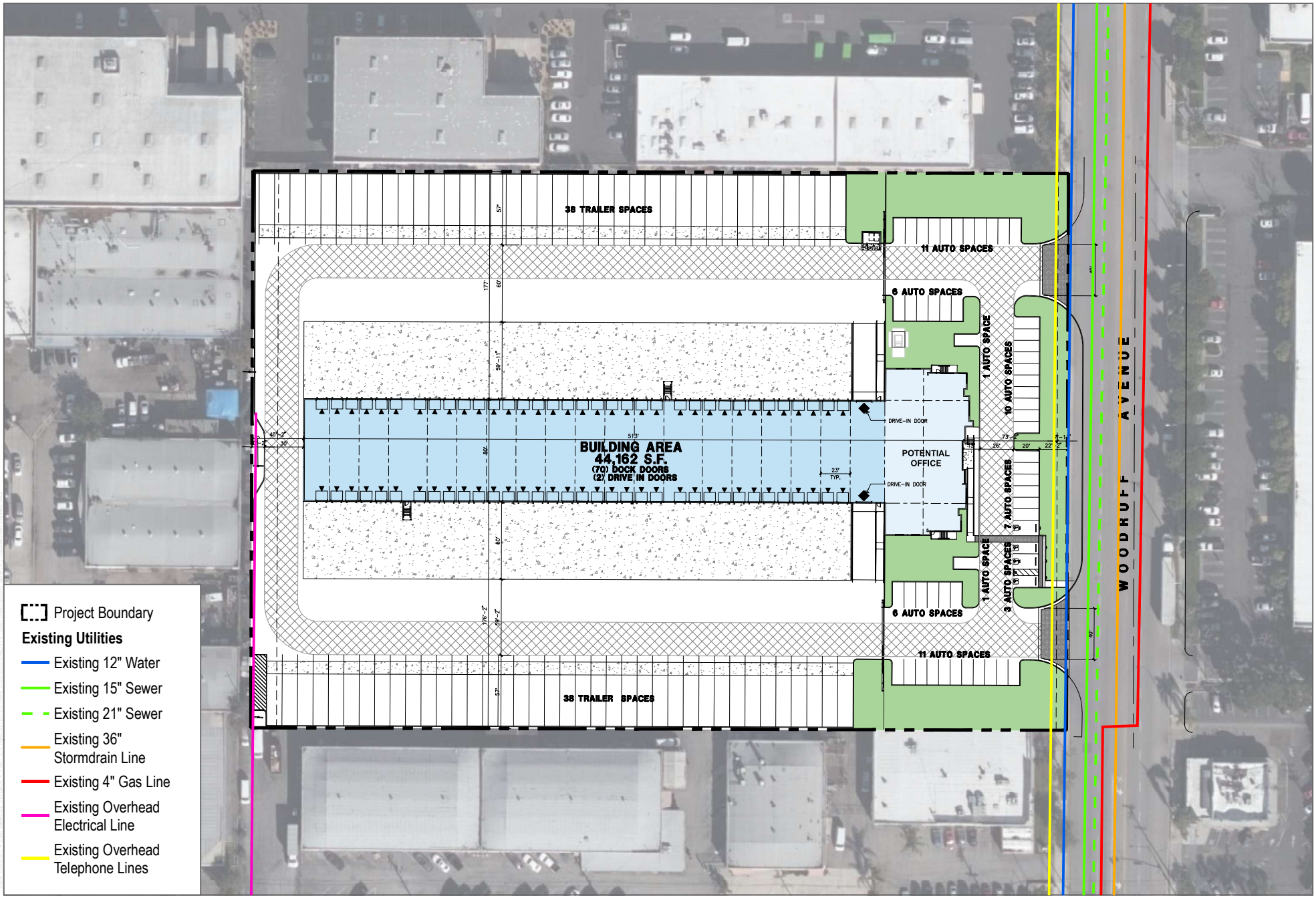

SOURCE: Bing Maps 2020; Open Street Map 2019; HPA Architecture 2020

DUDEK

0 50 100 Feet

FIGURE 12

Existing Utilities

12021 Woodruff Avenue Industrial Building Project

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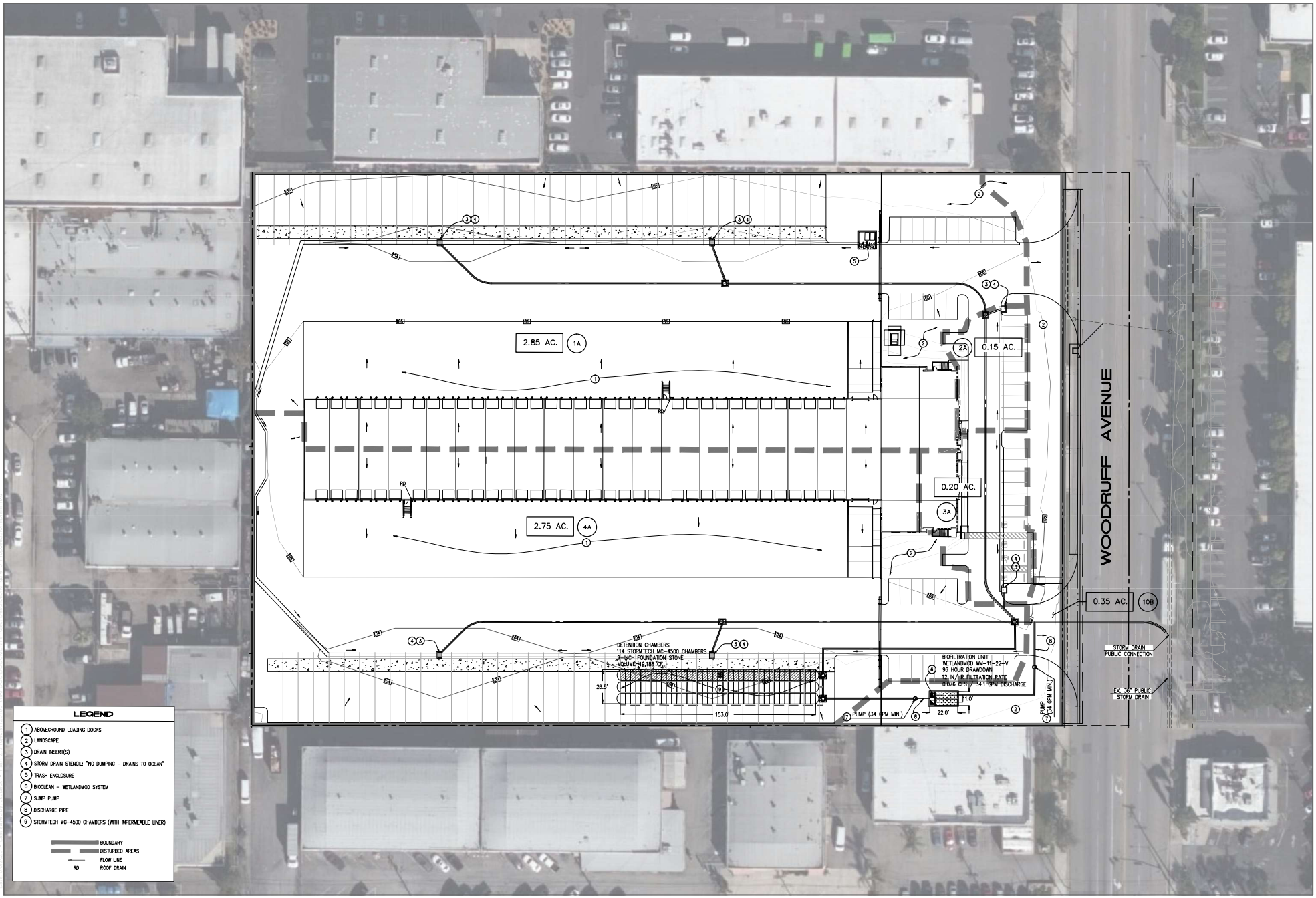

SOURCE: Bing Maps 2020; Open Street Map 2019; Thienes Engineering 2019

DUDEK

0 50 100 Feet

FIGURE 13

Proposed Storm Drain System

12021 Woodruff Avenue Industrial Building Project

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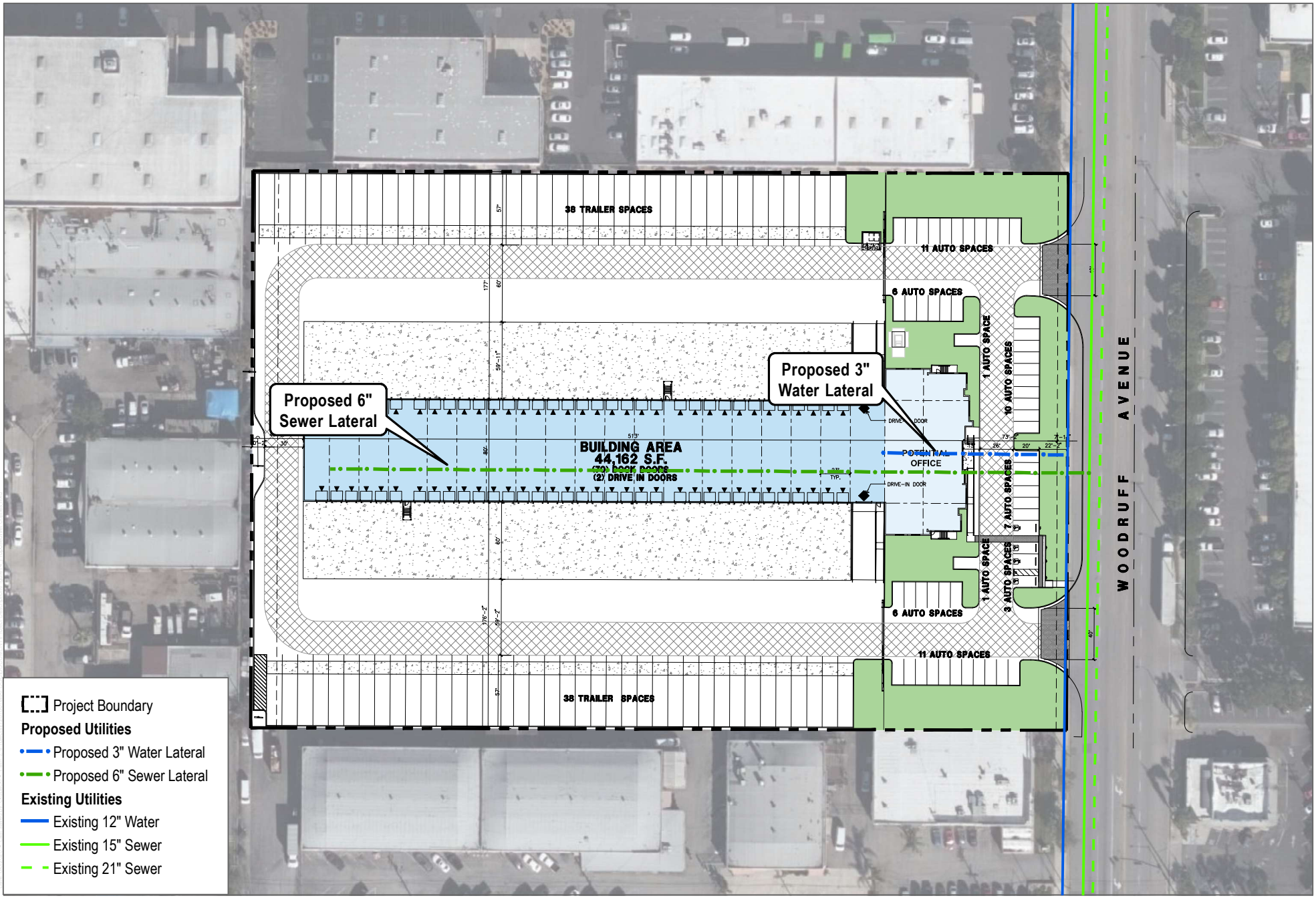

SOURCE: Bing Maps 2020; Open Street Map 2019; HPA Architecture 2020

DUDEK

0 50 100 Feet

FIGURE 14

Proposed Wet Utilities

12021 Woodruff Avenue Industrial Building Project

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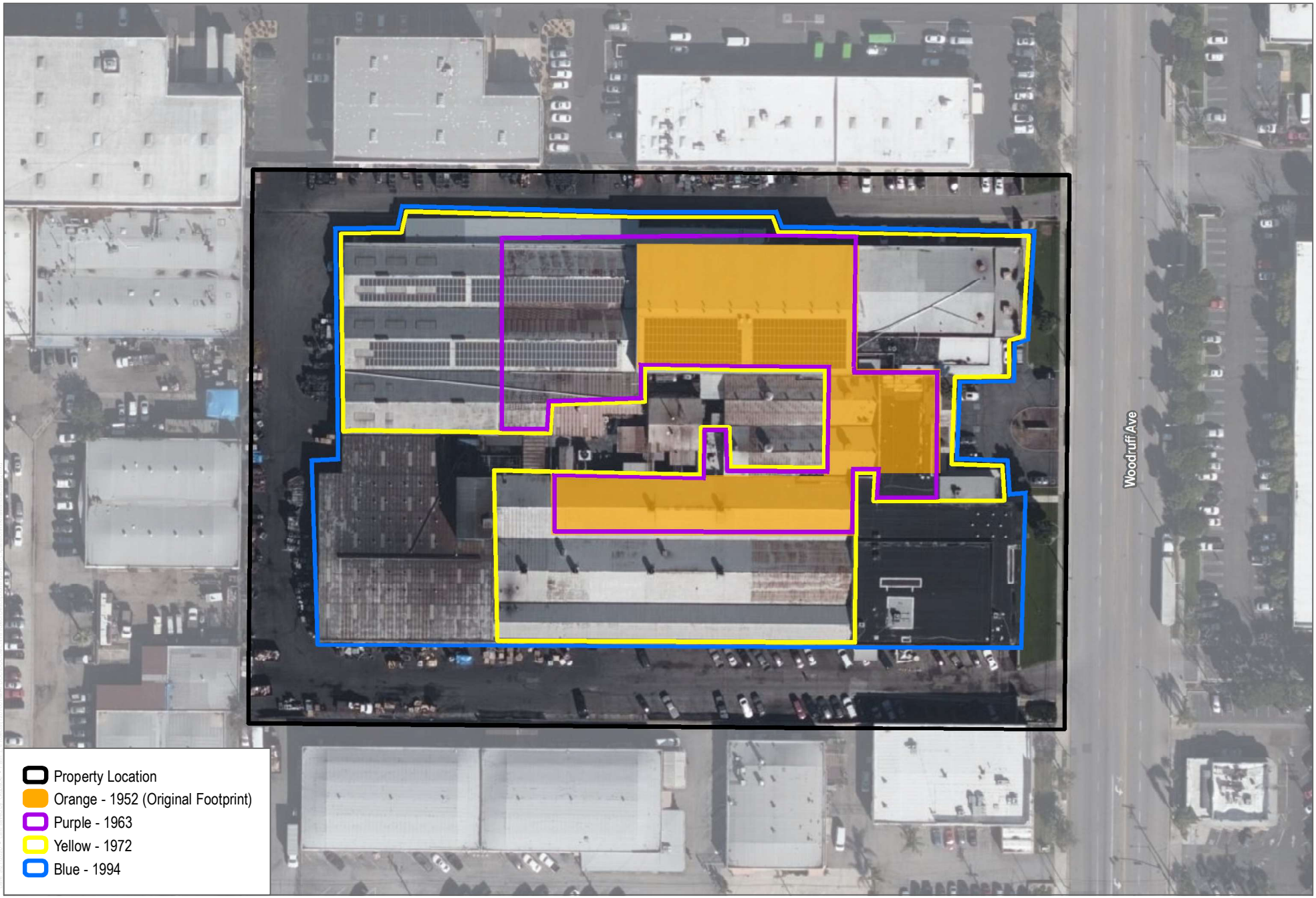

SOURCE: Bing Maps 2020; Open Street Map 2019; Data for this graphic was taken from historical aerial photographs of the Project site in 1952, 1963, 1972 and 1994 (NETR 2020; UCSB 2020)

DUDEK

0 50 100 Feet

FIGURE 15

Expansion of the Kirkhill Manufacturing Inc. Building

12021 Woodruff Avenue Industrial Building Project

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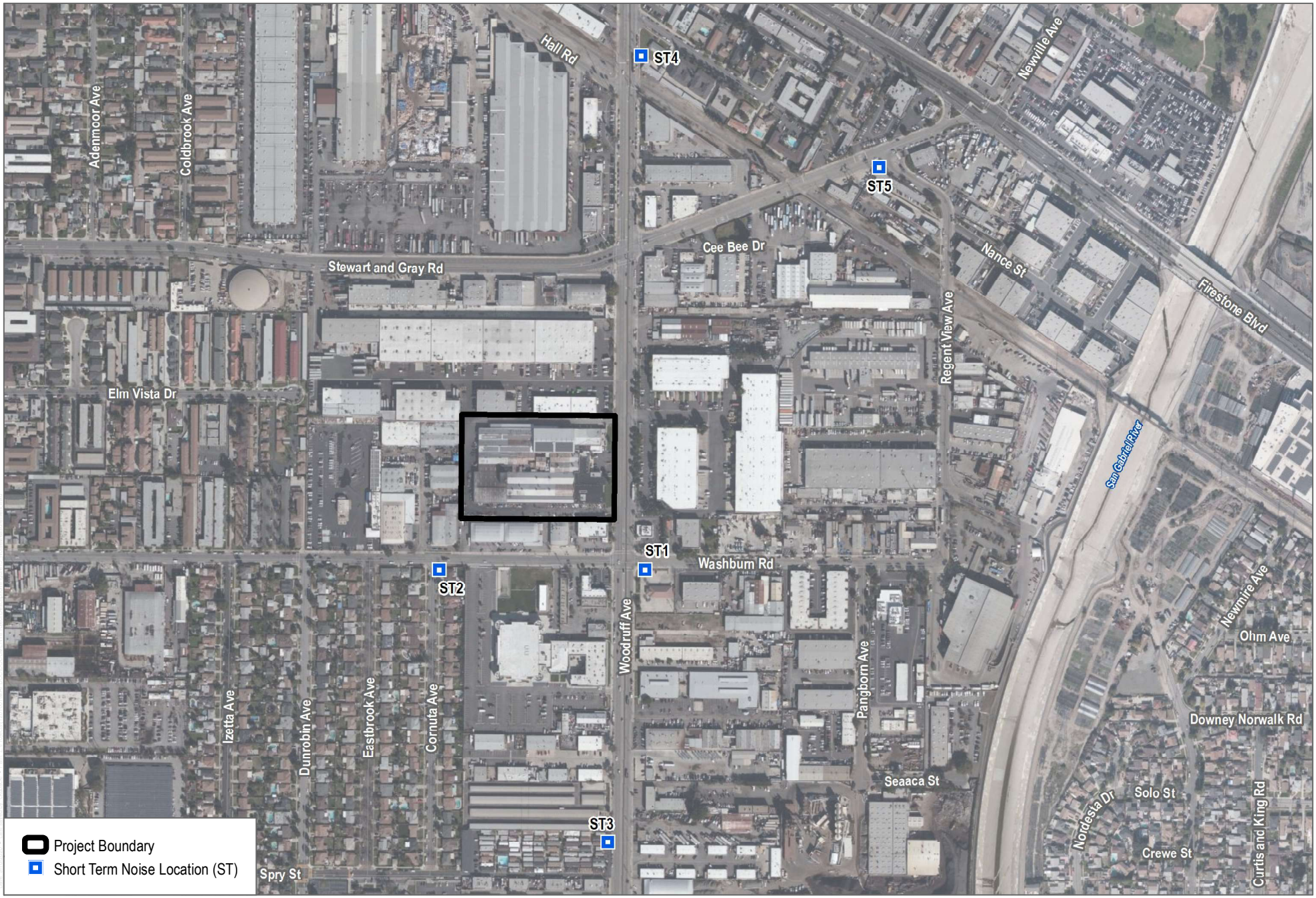

SOURCE: Bing Maps 2020; Open Street Map 2019

DUDEK

FIGURE 16

Noise Measurement and Modeling Locations

12021 Woodruff Avenue Industrial Building Project

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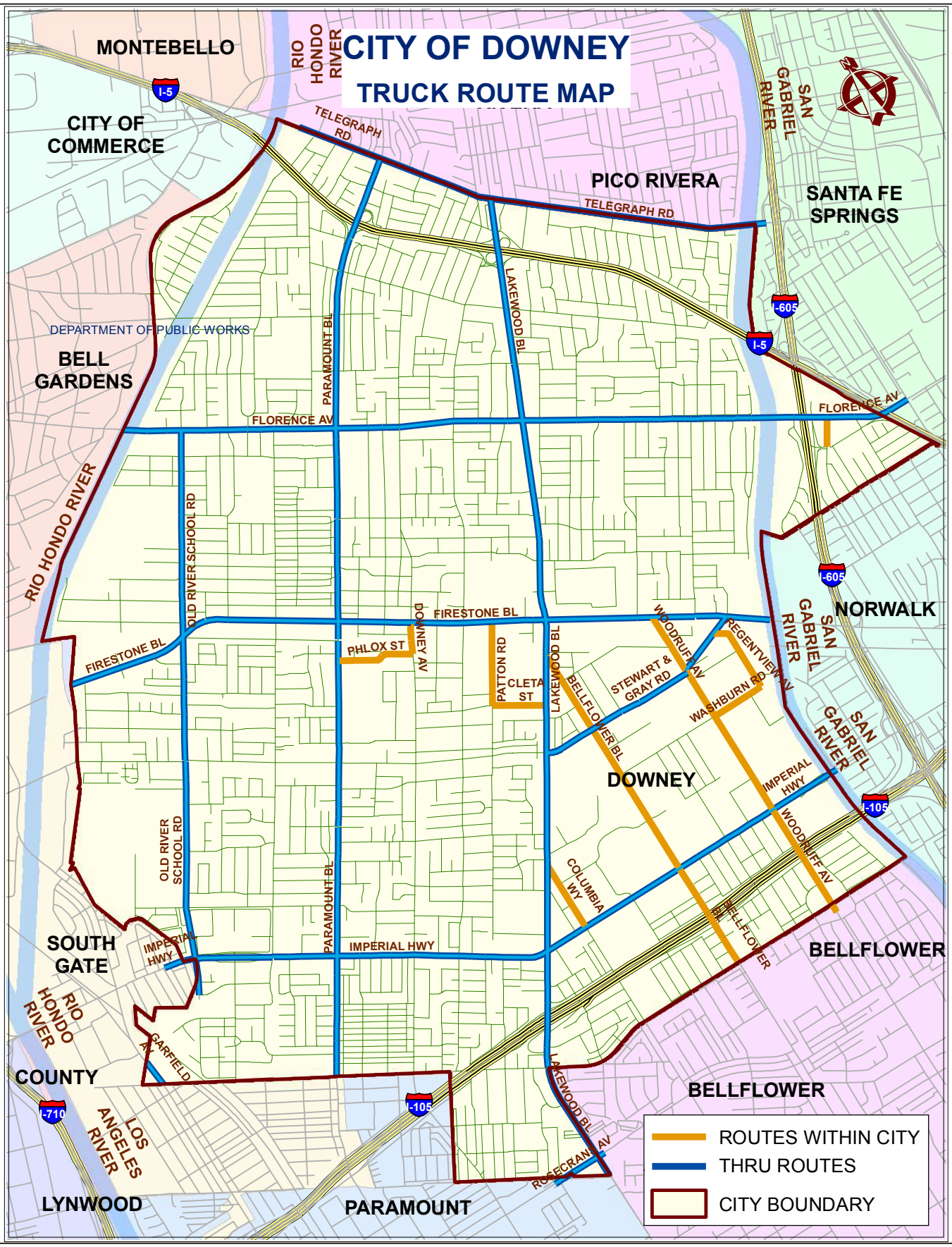

SOURCE: City of Downey 2018

FIGURE 17

City of Downey Truck Route Map

12021 Woodruff Avenue Industrial Building Project

DUDEK

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SOURCE: USDA NAIP 2016; Open Street Map 2019; USGS NHD 2020; Metro 2019; SCAG 2020

DUDEK

0 625 1,250 Feet

FIGURE 18

Transit and Bicycle Facilities

12021 Woodruff Avenue Industrial Building Project

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