Kimley»Horn

CityofDowney

Rancho Los Amigos South Campus Specific Plan

Draft Program Environmental Impact Report

SCH # 2019029057

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DRAFT

PROGRAM ENVIRONMENTAL IMPACT REPORT

Rancho Los Amigos South Campus Specific Plan Project

State Clearinghouse No. 2019029057

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ES EXECUTIVE SUMMARY

The environmental impact report (EIR) process, as defined by the California Environmental Quality Act (CEQA), requires the preparation of an objective, full-disclosure document in order to (1) inform agency decision-makers and the general public of the direct and indirect potentially significant environmental effects of a proposed action; (2) identify feasible or potentially feasible mitigation measures to reduce or eliminate potentially significant adverse impacts; and (3) identify and evaluate reasonable alternatives to a project. In accordance with §15168 of the State CEQA Guidelines (Title 14 of the California Code of Regulations [CCR]), this is a Program EIR (PEIR) that addresses the potential environmental impacts associated with the proposed Project, known as the "Rancho Los Amigos South Campus Specific Plan Project."

This Executive Summary summarizes the requirements of the CEQA Statutes and Guidelines; provides an overview of the Project and alternatives; identifies the purpose of the Draft PEIR; outlines the potential impacts of the Project and the recommended mitigation program; and discloses areas of controversy and issues to be resolved.

ES.1 PROJECT OVERVIEW

Project Location

The Rancho Los Amigos South Campus Specific Plan Project (RLASCSP Project or proposed Project) would be developed in the City of Downey. The approximately 172-acre Specific Plan area is located at the southwest corner of the City of Downey (City) in the southern portion of Los Angeles County (County). The City of Downey is a fully urbanized and developed city with a mix of residential densities and range of commercial and light industrial land uses. The Specific Plan area currently includes a mix of newer and aging industrial and institutional structures traversed by a defined roadway network in an urban setting. Active commercial manufacturing uses occupy the northern portion of the Specific Plan area, while the southern portion, the Focus Area, is in a generally neglected state with deteriorating structures and unmaintained parcels.

Project Description Summary

The RLASCSP or Specific Plan has been prepared to promote future development of the southern portion of the Rancho Los Amigos Campus. The RLASCSP is a City-initiated Specific Plan located completely on land that is owned by the County. Multiple concurrent development projects and studies were in process during the creation of the plan and were considered when developing this Specific Plan. In accordance with the goals of the City of Downey's Vision 2025 General Plan (DGP), the RLASCSP promotes economic development with a focus on a diverse mixture of job-generating land uses. The Specific Plan also prioritizes creating more livable communities with access to both regional transit and promotes alternative transit opportunities.

Over one-half (approximately 63 percent or 109 acres) of the approximately 172-acre RLASCSP area will either remain unchanged, or is committed to other projects being planned and studied by the County and the Los Angeles Metropolitan Transportation Authority (Metro). Potential environmental impacts associated with the County and Metro projects are analyzed under separate environmental documents. Accordingly, environmental impacts associated with the County and Metro projects are not evaluated

under this PEIR. The remainder of the Specific Plan area (approximately 37 percent or 62.5 acres) comprises the Project site, referred in this PEIR as the Focus Area. The Focus Area is planned and programmed for a mix of transit-oriented residential, retail, and office uses. Accordingly, this PEIR analyzes the RLASCSP's proposed development within the Focus Area.

The overall RLASCSP area has four geographical districts: Flex Tech/Bio Medical (FTBM), Regional Public Facilities (RPF), Transit-Oriented Development (TOD), and Community Serving (CS). The Focus Area includes three of the four districts: RPF, TOD, and CS; no FTBM land is located within the Focus Area.

The Project proposes to establish a maximum allowable development of 700 dwelling units (DUs) and 1,130,000 square feet (SF) of new non-residential (commercial, retail, office, public facilities, etc.) uses in the Focus Area. **Section 2.0: Project Description**, describes the Project in greater detail.

Project Objectives

Pursuant to State CEQA Guidelines §15124(b), the EIR project description must include "[a] statement of objectives sought by the proposed project…. The statement of objectives should include the underlying purpose of the Project."

- Create a mixed-use, compact, and multi-modal environment
- Promote sustainable principles in design and development
- Enhance the pedestrian scale and function of the built environment
- Establish a complementary mix of cultural uses, public spaces, and outdoor activities
- Create stronger connections with local neighborhoods and connectivity with mobility options
- Promote a family-oriented, culturally enriched, healthy lifestyle
- Celebrate and reinforce Downey's and the Rancho Los Amigos South Campus' character and history
- Enhance economic development successes in the area
- Support a flexible variety of land uses that further regional transportation and transit planning objectives

AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

CEQA Guidelines §§15123(b)(2) and (3) require that the EIR summary identify areas of controversy known to the Lead Agency, issues raised by agencies and the public, and issues to be resolved, including the choice among alternatives and whether, or how to, mitigate the significant effects.

Based on the Lead Agency's review of available information and comments received from the general public and other public agencies in response to the Notice of Preparation and public scoping meeting the following issues may be either controversial or require further resolution.

- Cultural Resources – development in historic District of City
- Air Quality – impacts from increased traffic and development
- Noise — impacts from increased traffic and development

- Aesthetics – proposed development standards permitting higher structures and potential impacts to nearby residential uses.

The above issues have been considered in this PEIR.

SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

The Project's environmental effects are addressed in **Sections 4.1** through **4.15** of this EIR. Project implementation would result in potentially significant impacts for the following topical issues: air quality, cultural resources, and greenhouse gases. Implementation of standard conditions and requirements (SCs), and mitigation measures (MMs) would reduce these impacts to levels considered less than significant, except concerning the following impacts, as discussed below.

Air Quality

The proposed Project would obstruct with implementation of the applicable air quality plan and result in a cumulatively considerable net increase of any criteria pollutant. Implementation of mitigation would ensure that future development projects that are not exempt from CEQA have construction-related air quality impacts analyzed and feasible measures incorporated as necessary to reduce potential impacts. However, due to the unknown nature of future construction activities associated with implementation of the Specific Plan, the potential exists that SCAQMD thresholds may be exceeded. Therefore, construction-related air quality impacts would be considered significant and unavoidable due to the potential magnitude of construction that could occur from Specific Plan implementation.

Cultural Resources

While the Project does not propose any development, future development could potentially result in direct impacts through the physical demolition, destruction, or alteration of potential historical resources within the Focus Area. Future development within the Focus Area assumes the demolition of contributor and non-contributor buildings and would remove remaining features of the Historic District's original 1888 Site Plan. Several mitigation measures would be applied to the Project. However, impacts to the Historic District would remain significant and unavoidable since the Historic District would no longer be eligible for the National Register of Historic Places and would be delisted from the California Register of Historical Resources.

Greenhouse Gas Emissions

Construction-related emissions are typically site-specific and depend upon multiple variables. Quantifying individual future development's air emissions from short-term, temporary construction-related activities is not possible due to project-level variability and uncertainties concerning locations, detailed site plans, construction schedules/duration, equipment requirements, etc., among other factors, which are presently unknown. Since these parameters can vary so widely (and individual project-related construction activities would occur over time dependent upon numerous factors), quantifying precise construction-related emissions and impacts would be speculative. Future development in the Focus Area would need to be analyzed on a project-by-project basis to determine the extent of each project's potential contribution to global climate change and appropriate mitigation measures specific to each project. Due to the uncertainty of timing of future development as well as project-specific details, future development could exceed SCAQMD recommended threshold of 3,000 MT CO2e per year. Therefore, impacts are considered significant and unavoidable.

SUMMARY OF ALTERNATIVES EVALUATED

CEQA states that an EIR must address "a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." [14 Cal. Code of Reg. 15126.6(a)]. As described in **Section 6.0: Alternatives to the Proposed Project** of this PEIR, four project alternatives were identified and analyzed for relative impacts as compared to the Project:

- Alternative A: No Project/No Construction
- Alternative B: No Project/Existing Land Use Designation
- Alternative C: Adaptive Reuse/Reduced Project Alternative
- Alternative D: Modified Land Uses

No Project/No Construction Alternative

The No Project/No Construction Alternative would retain the Focus Area in its current condition. With this Alternative, the site's existing uses would remain. None of the proposed Project improvements would be implemented.

No Project/Existing Land Use Designation Alternative

In this instance, the "no project" alternative is the circumstance under which the Project would not proceed, but the existing environmental conditions would not be preserved. The Specific Plan area, inclusive of the Focus Area, is wholly within the City. The Focus Area is currently zoned Rancho Business Center Specific Plan (SP 88-1). The SP 88-1 designation is intended to provide a comprehensive framework that promotes development of a master planned, light industrial business park. No residential uses would be allowed under the existing zoning.

The Focus Area includes vacant and occupied buildings and structures, mature ornamental landscaping (trees and shrubs), weedy vegetation, and some historically significant structures identified as contributors to the recognized Rancho Los Amigos Historic District. The Focus Area could be redeveloped consistent with the underlying zoning. The "No Project/Existing Land Use Designation" Alternative assumes development of the Focus Area consistent with the SP 88-1 allowed density and intensity. This alternative assumes that the existing uses would be demolished and replaced with new commercial uses at the maximum allowable development capacity.

Adaptive Reuse/Reduced Project Alternative

The Adaptive Reuse/Reduced Project Alternative would minimize impacts to the Focus Area by reducing demolition of historical structures and avoiding construction of any new buildings, while still allowing for some (but not all) of the proposed uses.

The Adaptive Reuse/Reduced Project Alternative would minimize impacts by reducing demolition of historical structures in the Historical District and allow for some (but not all) of the proposed Project's uses. Several historical buildings within the Focus Area would be adaptively reused for this purpose and overall, a reduced development density for residential and non-residential uses would occur. Within the Focus Area, the following historic buildings, structures, and features would be retained: No. 1300

(Power Plant), No. 1301 (Water Tower), No. 1302 (Shop and Laundry), No. 1100 (Administration Building), and the Moreton Bay Fig Tree. Inclusive of buffering, this would reduce the Focus Area developable acreage from approximately 47.8 acres to approximately 44.3 acres.

Modified Land Use Alternative

The Proposed Project assumes 700 DUs and 1,130,000 sf of non-residential development. The Modified Land Use Alternative assumes development of the Focus Area with 2,100 DUs; no non-residential development is assumed.

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table ES-1: Summary of Project Impacts and Mitigation provides a summary of the potential environmental effects of the Proposed Project, the Mitigation Program recommended to ensure that Project impacts are mitigated to the extent feasible, and the expected status of effects following the implementation of the Mitigation Program. The Mitigation Program is comprised Standard Conditions and Requirements (SCs) and Mitigation Measures (MMs). The Mitigation Program will serve to prevent, reduce, and/or fully mitigate potential environmental impacts. The more detailed evaluation of these issues, as well as the full text of the Mitigation Program, is presented in PEIR **Section 4.1** through **4.15**.

Given the length of some measures and conditions, some are only summarized in the table. Each measure is identified by a number that can be used to reference the full text of the measure in the applicable PEIR section. Where a measure applies to more than one topic, it is presented (either summarized or full text) in the primary section to which it applies, and is then cross-referenced.

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Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures and Standard Conditions	Level of Significance After Mitigation
4.1 Aesthetics			
Impact 4.1-1: Would the project have a substantial adverse effect on a scenic vista?	No Impact	No mitigation is required.	No Impact
Impact 4.1-2: 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	No mitigation is required.	No Impact
Impact 4.1-3: 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 with Mitigation	MM CR-3 and CR-5 are applicable; see Section 4.3: Cultural Resources.	Less than Significant
Impact 4.1-4: Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	Less than Significant	No mitigation is required.	Less than Significant
4.2 Air Quality			
Impact 4.2-1: Would the project's construction and operations conflict with implementation of the applicable air quality plan?	Significant and Unavoidable.	**MM AQ-1:** Proposed development projects that are not exempt from CEQA shall have construction and operational air quality impacts analyzed using the latest available air emissions model, or other analytical method determined in conjunction with the SCAQMD. The results of the air quality impact analysis shall be included in the development project's CEQA documentation. To address potential localized impacts, the air quality analysis may incorporate SCAQMD's Localized Significance Threshold analysis or other appropriate analyses as determined in conjunction with South Coast AQMD. If such analyses identify potentially significant regional or local air quality impacts, the	Significant and Unavoidable.

Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures and Standard Conditions	Level of Significance After Mitigation
		City shall require the incorporation of appropriate mitigation to reduce such impacts.	
Impact 4.2-2: 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?	Significant and Unavoidable.	**SC 4.2 -1: Dust Control.** During construction of future development within the Specific Plan area, each project applicant shall require all construction contractors to comply with South Coast Air Quality Management District's (SCAQMD's) Rules 402 and 403 in order to minimize short-term emissions of dust and particulates. SCAQMD Rule 402 requires that air pollutant emissions not be a nuisance off-site. SCAQMD Rule 403 requires that fugitive dust be controlled with Best Available Control Measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. This requirement shall be included as notes on the contractor specifications. Table 1 of Rule 403 lists the Best Available Control Measures that are applicable to all construction projects. **SC 4.2-2: Architectural Coatings.** Architectural coatings shall be selected so that the VOC content of the coatings is compliant with SCAQMD Rule 1113. This requirement shall be included as notes on the contractor specifications. MM AQ-1 is applicable.	Significant and Unavoidable.
Impact 4.2-3: Would the project expose sensitive receptors to substantial pollutant concentrations?	Less than Significant with Mitigation	**MM AQ-2:** A project-specific Health Risk Assessment (HRA) shall be conducted for future residential development proposed within 500 feet of the Metrolink right-of-way, pursuant to the recommendations set forth in the CARB Air Quality and Land Use Handbook. If projects are found to exceed the SCAQMD's Health Risk Assessment thresholds, mitigation shall be incorporated to reduce impacts to below SCAQMD thresholds.	Less than Significant
Impact 4.2-4: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less than Significant	No mitigation is required.	Less than Significant

Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures and Standard Conditions	Level of Significance After Mitigation
4.3 Biological Resources			
Impact 4.3-1: Would the project have a substantial 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 of U.S. Fish and Wildlife Service?	No Impact	No mitigation is required.	No Impact
Impact 4.3-2: 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 Wildlife or U.S. Fish and Wildlife Service?	No Impact	No mitigation is required.	No Impact
Impact 4.3-3: Would the project have a substantial adverse effect on state or federally protected wetlands?	No Impact	No mitigation is required.	No Impact
Impact 4.3-4: 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?	Less than Significant with Mitigation	**MM BIO-1:** Applications for future development facilitated by the Specific Plan Project, where the City has determined a potential for impacts to a nesting birds, shall be required to comply with the following mitigation framework: a. Future project-related construction, demolition, and tree maintenance activities should occur outside of general avian breeding season (February 1 to through August 31) to the extent feasible. If project-related construction, demolition, and tree maintenance activities cannot occur outside general avian breeding season, a pre-activity nesting bird survey shall be conducted prior to the onset of the aforementioned activities, within a maximum of 14 days prior to commencement.	Less than Significant

Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures and Standard Conditions	Level of Significance After Mitigation
		b. If any active nests or sign of nesting activity (e.g., carrying nesting material or food) is observed during the pre-activity survey, a suitable buffer shall be established around the nest as determined by a qualified biologist to ensure no direct or indirect impacts occur to the nest. The buffer shall remain in place for the duration the nest is active as determined by a qualified biologist. **MM BIO-2:** Applications for future development facilitated by the Specific Plan Project, where the City has determined a potential for impacts to bats, shall be required to comply with the following mitigation framework: a. Focused roosting surveys shall be conducted throughout the Focus Area by a qualified biologist to determine if bat species are presently using the on-site structures for roosting. b. If there is evidence of established maternity bat roosts in the Focus Area, the biologist shall recommend exclusionary devices or removal efforts, as necessary based on specific species and situational criteria. c. If it is determined by the bat biologist that there is a substantial population of bats using the structures in the Focus Area, the construction of bat houses on-site may be recommended by the qualified biologist and in consultation with CDFW.	
Impact 4.3-5: Would the project conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No Impact	No mitigation is required.	No Impact
Impact 4.3-6: Would the project conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact	No mitigation is required.	No Impact

Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures and Standard Conditions	Level of Significance After Mitigation
4.4 Cultural Resources			
Impact 4.4-1: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Significant and Unavoidable	**MM CR-1: Recordation of the Historic District's Site Plan.** The buildings in the Historic District were previously recorded in a HABS report; however, one contributing component of the District was not recorded at the time: the landscape and site plan. Prior to any demolition or ground disturbing activity, the property owner shall retain a Qualified Preservation Professional to prepare a Historic American Landscape Survey (HALS) Level I Standard Format documentation of the Historic District's Site Plan and landscape setting, including hardscape and softscape elements and features from the historic period of significance, such as roadways, curbs, sidewalks, mature trees, fields, gardens, and green spaces. The HALS documentation of the Historic District's Site Plan shall record the history of the contributing elements, as well as important events or other significant contributions to the patterns and trends of history with which the property is associated. **MM CR-2: Interpretive and Commemorative Program.** The property owner shall retain a Qualified Preservation Professional to develop and implement a publicly accessible interpretive and commemorative program (Program) that captures and incorporates the important cultural history, associations, and significance of the Rancho Los Amigos Historic District for the public benefit, such that the cultural importance of the Los Angeles County Poor Farm and Rancho Los Amigos is retained for future generations. The Program's requirements shall be outlined in a technical memorandum, including the requirements for maintenance and operation of the program's elements that may include but not be limited to an on- or off-site exhibit, commemorative marker, oral history, video, or other publicly accessible media. **MM CR-3: Salvage Plan and Inventory Report.** Prior to the start of demolition, the property owner shall retain a Qualified Preservation Professional to prepare a Salvage Plan and Inventory Report outlining	Significant and Unavoidable

Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures and Standard Conditions	Level of Significance After Mitigation
		salvageable materials and reuse or disposal options. The Qualified Preservation Professional shall conduct an inventory of the Historic District contributors' key character-defining physical features (e.g., decorative features, window elements, shingling, etc.) appropriate for salvage and interpretation. The Salvage Plan and Inventory Report shall include retention of LACO No. 1301 (Water Tower) for inclusion in the interpretive program. Unsound, decayed, or toxic materials (e.g., asbestos, lead paint, etc.) need not be included in the salvage plan. Once salvageable materials are identified, the Qualified Preservation Professional shall monitor their collection by future applicants' construction contractor(s) to ensure the items are appropriately salvaged and are not damaged during removal. Salvage of materials can occur prior to the start of demolition, or concurrently with demolition, as feasible. Salvaged materials shall be stored on-site either in existing structures, or in an off-site storage facility, to limit exposure to the elements (rain/sun, vandalism, and theft). **MM CR-4: Mothballing Plan**. The property owner shall retain a Qualified Preservation Professional to prepare and implement a Mothballing Plan for LACO No. 1283 (Casa Consuelo) and LACO No. 1301 (Water Tower). The Mothballing Plan shall outline the proposed mothballing process in compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and consistent with National Park Service Preservation Brief No. 31, Mothballing Historic Buildings. The Plan shall include at a minimum: a condition assessment; measures for structural stabilization as necessary; pest control measures; weatherization efforts as necessary; and other mothballing procedures, such as securing the building, providing adequate ventilation, and developing a maintenance and monitoring plan. Once the buildings/structures have been mothballed, the Qualified Preservation Professional shall review the resulting condition of the	

Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures and Standard Conditions	Level of Significance After Mitigation
		buildings/structures and provide the City with documentation confirming that the Plan has been carried out. **MM CR-5: Avoidance and Protection of Retained Historic Resources During Construction.** Prior to the start of construction, a Qualified Preservation Professional shall be retained by the property owner to develop a plan of action for avoidance and protection of the retained historic resources in the Focus Area, the Administration Building (LACO No. 1100); the grouping of the Power Plant (LACO No. 1300); Water Tower (1301); and the Shop, Laundry and Ice Plant (LACO No. 1302), and the Moreton Bay Fig Tree in coordination with the City.	
Impact 4.4-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Less than Significant with Mitigation	**MM CR-6: Retention of a Qualified Archaeologist.** Prior to any ground-disturbing activities (i.e., demolition, pavement removal, pot-holing or augering, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the Applicant or their designee shall retain a Qualified Archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology to oversee and ensure all mitigation related to archaeological resources is implemented. **MM CR-7: Construction Worker Cultural Resources Sensitivity Training**. Prior to any ground-disturbing activities (i.e., demolition, pavement removal, pot-holing or augering, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the Qualified Archaeologist, or his/her designee, and a Native American representative (selected from this Project's California Native American Heritage Commission [NAHC] contact list), shall conduct cultural resources sensitivity training for all construction personnel. In the event construction crews are phased, additional training shall be conducted for new construction personnel. This training may be conducted in	Less than Significant

Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures and Standard Conditions	Level of Significance After Mitigation
		coordination with paleontological resources training required by MM CR-12. **MM CR-8: Cultural Resources Monitoring Program (CRMP)** Prior to any ground-disturbing activity (i.e., demolition, pavement removal, pot-holing or augering, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the Qualified Archaeologist shall prepare the CRMP based on the final City-approved Project design plans. **MM CR-9: Archaeological Monitoring.** All ground-disturbing activity (i.e., demolition, pavement removal, pot-holing or augering, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil) to a depth of 5.0 feet (depth at which archaeological sensitivity decreases) shall be monitored by an archaeological monitor(s) familiar with the types of resources that could be encountered and shall work under the Qualified Archaeologist's direct supervision. The Qualified Archaeologist shall determine the number of archaeological monitors required on-site during ground-disturbing activities based on the construction scenario, pieces of equipment operating at the same time, the distance between those pieces of equipment, and the pace at which equipment is working, with the goal of monitors being able to effectively observe soils as they are exposed.	
Impact 4.4-3: Would the project disturb any human remains, including those interred outside of dedicated cemeteries?	Less than Significant with Mitigation	**MM CR-10: Unanticipated Discovery.** In the event that human remains are discovered or unearthed, all earth-disturbing work within a 100-meter radius of the location of the human remains shall be temporarily suspended or redirected by the applicant until a forensic expert retained by the applicant has identified and evaluated the nature and significance of the find, in compliance with State CEQA Guidelines §15064.5(f). If human remains of Native American origin are discovered	Less than Significant

Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures and Standard Conditions	Level of Significance After Mitigation
		or unearthed, the applicant shall contact the consulting tribe, as detailed in **MM TCR-1**, regarding any finds and provide information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input concerning significance and treatment. After the find has been appropriately mitigated, as determined and documented by a qualified archaeologist, work in the area may resume.	
Impact 4.4-4: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less than Significant with Mitigation	**MM CR-11: Retention of a Qualified Paleontologist.** Prior to start of any ground-disturbing activities (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the property owner shall retain a Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) standards (SVP, 2010). The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the Project kick-off meeting and Project progress meetings on a regular basis, and shall report to the Project Site in the event potential paleontological resources are encountered. **MM CR-12: Construction Worker Paleontological Resources Sensitivity Training.** Prior to start of any ground-disturbing activities (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the Qualified Paleontologist, or his/her designee, shall conduct construction worker paleontological resources sensitivity training. In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. The training shall focus on the recognition of the types of paleontological resources that could be encountered within the Focus Area, the procedures to be followed if they are found, confidentiality of discoveries, and safety precautions to be taken when working with paleontological monitors.	Less than Significant

Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures and Standard Conditions	Level of Significance After Mitigation
		The property owner shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance. This training may be conducted in coordination with cultural resources training required by MM CR-7. **MM CR-13: Paleontological Resources Monitoring.** Full-time paleontological resources monitoring shall be conducted for all ground disturbing activities at or below five feet (depth at which paleontological resources sensitivity increases). The Qualified Paleontologist shall spot check the excavation on an intermittent basis and recommend whether the depth or frequency of required monitoring should be revised based on his/her observations. Paleontological resources monitoring shall be performed by a qualified paleontological monitor (meeting the standards of the SVP) under the direction of the Qualified Paleontologist. The number of paleontological monitors required to be on-site during ground disturbing activities shall be determined by the Qualified Paleontologist and shall be based on the construction scenario, specifically the number of pieces of equipment operating at the same time, the distance between these pieces of equipment, and the pace at which equipment is working, with the goal of monitors being able to effectively observe soils as they are exposed. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils in order to recover the fossil specimens. **MM CR-14: Inadvertent Discovery of Paleontological Resources.** If construction or other Project personnel discover any potential fossils during construction, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and made recommendations as to the appropriate treatment. If the find is deemed significant, it shall be salvaged following the standards of the SVP (SVP, 2010) and curated with a certified repository.	

Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures and Standard Conditions	Level of Significance After Mitigation
4.5 Energy			
Impact 4.5-1: 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	No mitigation is required.	Less than Significant
Impact 4.5-2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less than Significant	No mitigation is required.	Less than Significant
4.6 Greenhouse Gas Emissions			
Impact 4.6-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Significant and Unavoidable	No feasible mitigation measures.	Significant and Unavoidable
Impact 4.6-2: Would the project conflict with any applicable plan, policy, regulation, or recommendation of an agency adopted for the purpose of reducing the emissions of GHG?	Less than Significant	No mitigation is required.	Less than Significant
4.7 Hazards and Hazardous Materials			
Impact 4.7-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than Significant with Mitigation	**MM HAZ-1:** Prior to any renovation, or demolition, grading or building permit approval, a formal Phase I Environmental Site Assessment (ESA) shall be prepared for any vacant, commercial, and industrial properties involving hazardous materials or waste. The Phase I ESA shall be prepared in accordance with ASTM Standard Practice E 1527-13 or the Standards and Practices for All Appropriate Inquiry (AAI), prior to any land acquisition, demolition, or construction activities. The Phase I ESA would identify specific Recognized Environmental Conditions (RECs), which may require further sampling/remedial activities by a qualified hazardous materials Environmental Professional with Phase II/site characterization experience prior to land acquisition, demolition, and/or	Less than Significant

Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures and Standard Conditions	Level of Significance After Mitigation
		construction. The Environmental Professional shall identify proper remedial activities, if necessary. **MM HAZ-2:** If the contractor discovers unknown wastes or suspect materials during construction that are believed to involve hazardous waste or materials, the contractor shall: (a) Immediately cease work in the suspected contaminant's vicinity, and remove workers and the public from the area; (b) Notify the County's Project Engineer; (c) Secure the area as directed by the Project Engineer; and (d) Notify the implementing agency's Hazardous Waste/Materials Coordinator. The Hazardous Waste/Materials Coordinator shall advise the responsible party of further actions that shall be taken, if required.	
Impact 4.7-2: 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	No mitigation is required.	Less than Significant
Impact 4.7-3: 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?	Less than Significant	No mitigation is required.	Less than Significant
Impact 4.7-4: 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, could create a significant hazard to the public or the environment?	Less than Significant with Mitigation	MM HAZ-1 and MM HAZ-2 are applicable.	Less than Significant

Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures and Standard Conditions	Level of Significance After Mitigation
Impact 4.7-5: Would the project be located within an airport land use plan or within two miles of a public airport or public use airport, and as a result create a safety hazard or excessive noise for people residing or working in the project area?	No Impact.	No mitigation is required.	No Impact.
Impact 4.7-6: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than Significant	No mitigation is required.	Less than Significant
Impact 4.7-7: Would the project expose people or structure, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	No Impact.	No mitigation is required.	No Impact.
4.8 Hydrology and Water Quality			
Impact 4.8-1: Would the project violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or groundwater quality?	Less than Significant	No mitigation is required.	Less than Significant
Impact 4.8-2: 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?	Less than Significant	No mitigation is required.	Less than Significant
Impact 4.8-3: 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 surface in a manner that would: result in substantial erosion or siltation on-or off-site; substantially increase the rate or	Less than Significant	No mitigation is required.	Less than Significant

Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures and Standard Conditions	Level of Significance After Mitigation
amount of surface runoff in a manner which could result in flooding on- or off-site; or create or contribute runoff water which could exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			
Impact 4.8-4: In flood, tsunami or seiche zones, would the project risk release of pollutants due to project inundation?	Less than Significant	No mitigation is required.	Less than Significant
Impact 4.8-5: Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	No Impact	No mitigation is required.	Less than Significant
4.9 Land Use and Planning			
Impact 4.9-1: Would the project physically divide an established community?	No Impact	No mitigation is required.	No Impact
Impact 4.9-2: Would the project cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less than Significant	No mitigation is required.	Less than Significant
4.10 Noise			
Impact 4.10-1: Would the project generate a substantial temporary 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 during on-site construction activities or during project operations?	Less than Significant with Mitigation	**MM NOI-1:** To reduce construction-related noise impacts, where construction activities would exceed the standards established in DMC §4606.5 (Construction Noise), the Applicant shall require construction contractors to implement a site-specific Noise Reduction Program ongoing through demolition, grading, and/or construction. **MM NOI-2:** Prior to demolition, grading, or building permit approval, the Applicant shall submit to the Planning Division and Community	Less than Significant

Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures and Standard Conditions	Level of Significance After Mitigation
		Development Department a list of measures to respond to and track complaints pertaining to construction noise, ongoing throughout demolition, grading, and/or construction.	
Impact 4.10-2: Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?	Less than Significant with Mitigation	**MM NOI-3: Vibratory Equipment for Historic Buildings.** To avoid or minimize potential construction vibration damage to structural or finish materials on on-site historic buildings, the condition of such materials shall be documented by a qualified preservation consultant, prior to initiation of construction. During construction, the contractor shall install and maintain at least two continuously operational automated vibrational monitors on any on-site historic structures within 100 feet of active construction activity. Furthermore, once construction has been completed, a qualified preservation consultant shall conduct a final visual inspection of the on-site historic structures to determine if any damage has occurred. In the event damage occurs to historic finish materials due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant. **MM NOI-4: Vibratory Equipment for Residential Receptors.** Use of high impact, heavy-duty equipment shall be limited to the extent feasible within 25 feet of residential receptors. Where feasible, equipment or alternative techniques that would generate vibration velocities not exceeding 0.04 in/sec PPV at 25 feet shall be utilized. **MM NOI-5: Notify Residences.** Prior to large bulldozers, large loaded trucks, and vibratory compactor/rollers being operated at the Specific Plan area within 50 feet of an occupied residence, the Project Contractor(s) shall notify the affected residential property owners in writing of upcoming construction including the anticipated start and end dates and hours of operation. This restriction does not apply to trucks on a public right-of-way.	Less than significant

Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures and Standard Conditions	Level of Significance After Mitigation
Impact 4.10-3: Would the project be 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 and expose people residing or working in the project area to excess noise levels?	No Impact	No mitigation is required.	No Impact
4.11 Population and Housing			
Impact 4.11-1: Would implementation of the project induce substantial 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	No mitigation is required.	Less than Significant
Impact 4.11-2: Would implementation of the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Less than Significant	No mitigation is required.	Less than Significant
4.12 Public Services and Recreation			
Impact 4.12-1: 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 fire protection?	Less than Significant	No mitigation is required.	Less than Significant

Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures and Standard Conditions	Level of Significance After Mitigation
Impact 4.12-2: 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 police protection?	Less than Significant	No mitigation is required.	Less than Significant
Impact 4.12-3: 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 schools?	Less than Significant	No mitigation is required.	Less than Significant
Impact 4.12-4: 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 library services?	Less than Significant	No mitigation is required.	Less than Significant
Impact 4.12-5: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or	Less than Significant	No mitigation is required.	Less than Significant

Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures and Standard Conditions	Level of Significance After Mitigation
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 parks?			
Impact 4.12-6: 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	No mitigation is required.	Less than Significant
Impact 4.12-7: 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	No mitigation is required.	Less than Significant
4.13 Transportation			
Impact 4.13-1: Would implementation of the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less than Significant	No mitigation is required.	Less than Significant
Impact 4.13-2: Would the project would not conflict or be inconsistent with CEQA Guidelines §15064.3?	Less than Significant	No mitigation is required.	Less than Significant
Impact 4.13-3: Would implementation of the project substantially increase hazards due to a geometric design feature?	Less than Significant	No mitigation is required.	Less than Significant
Impact 4.13-4: Would the project result in inadequate emergency access?	Less than Significant	No mitigation is required.	Less than Significant

Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures and Standard Conditions	Level of Significance After Mitigation
4.14 Tribal Cultural Resources			
Impact 4.14-1: 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?	Less than Significant with Mitigation	**MM TCR-1: Inadvertent Discovery of Archaeological Resources.** In the event that archaeological resources are encountered during ground-disturbing activities, all activity within a 100-foot radius of the find shall cease and the CRMP protocols and procedures for discoveries shall be implemented (see MM CR-8). The Qualified Archaeologist shall evaluate the discovery for potential significance. If the Qualified Archaeologist determines that the resource may be significant (i.e., meets the definition for historical resource in CEQA Guidelines §15064.5(a) or unique archaeological resource in PRC §21083.2(g)), the Qualified Archaeologist shall develop an appropriate treatment plan for the resource in accordance with the CRMP. When assessing significance and developing treatment for resources that are Native American in origin, the Qualified Archaeologist and the City shall consult with the appropriate Native American representatives. The Qualified Archaeologist shall also determine if work may proceed in other parts of the Project Site while treatment for cultural resources is being carried out. **MM TCR-2: Native American Monitoring.** In the event the Qualified Archaeologist determines that an archaeological discovery is Native American in origin, the Applicant or their designee shall retain a qualified Native American monitor to provide monitoring during testing and data recovery efforts of the discovered resource in accordance with CRMP protocols and procedures (see MM CR-8). The Native American monitor shall be selected from a Tribe that is culturally and geographically affiliated with the Specific Plan area (according to this Project's NAHC contact list). In the event of a discovery, the City shall also determine if Native American monitoring of any future ground-disturbing activities is warranted.	Less than Significant

Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures and Standard Conditions	Level of Significance After Mitigation
4.15 Utilities and Service Systems			
Impact 4.15-1: 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	No mitigation is required.	Less than Significant
Impact 4.15-2: 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	No mitigation is required.	Less than Significant
Impact 4.15-3: 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	No mitigation is required.	Less than Significant
Impact 4.15-4: Would the project generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure?	Less than Significant	No mitigation is required.	Less than Significant
Impact 4.15-5: Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less than Significant	No mitigation is required.	Less than Significant

1.0 INTRODUCTION

The City of Downey (City) is the Lead Agency under the California Environmental Quality Act (CEQA) and has determined that a Program Environmental Impact Report (PEIR) is required to assess the potential environmental impacts associated with the Rancho Los Amigos South Campus Specific Plan Project (Project or RLASCSP). This PEIR has been prepared in accordance with CEQA (California Public Resources Code [PRC] §21000 et seq.); State CEQA Guidelines (California Code of Regulations [CCR], Title 14, §15000 et seq.); and the rules, regulations, and procedures for implementation of CEQA, as adopted by the City. An EIR is the most comprehensive form of environmental documentation identified in CEQA and the CEQA Guidelines, and provides the information needed to assess the environmental consequences of a proposed project to the extent feasible. EIRs are intended to provide an objective, factually supported, full-disclosure analysis of the environmental consequences associated with a project that may have the potential to result in significant adverse environmental impacts.

The Focus Area (Project site) of the RLASCSP area is in the southwest part of the City. The Specific Plan area encompasses an approximately 171.85-acre area, generally bordered by Imperial Highway to the north, Gardendale Street to the south, Rives Avenue to the east, and Old River School Road to the west. For more detailed information regarding the Project, please refer to **Section 2.0: Project Description**.

1.1 PURPOSE OF THIS ENVIRONMENTAL IMPACT REPORT

As explained in State CEQA Guidelines §15121, an EIR is a public informational document used in the planning and decision-making process to inform public agency decision-makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to a project. This PEIR analyzes the potential environmental impacts associated with Project implementation. The City of Downey Planning Commission and City Council will consider the information in this PEIR, including the public comments and staff response to those comments, during the public review and hearing process. As a legislative action, the final decision would be made by the City Council, who may approve, conditionally approve, or deny the Project.

The purpose of an EIR is to identify:

- The significant potential impacts of the project on the environment and indicate the manner in which those significant impacts can be avoided or mitigated;
- Any unavoidable adverse impacts that cannot be mitigated; and
- Reasonable and feasible alternatives to the project that would eliminate any significant adverse environmental impacts or reduce the impacts to a less than significant level.

An EIR also discloses potential growth-inducing impacts; impacts found not to be significant; and significant cumulative impacts of the project when taken into consideration with past, present, and reasonably anticipated future projects.

CEQA requires an EIR to reflect the Lead Agency's independent judgment. A Draft EIR is circulated to responsible and trustee agencies with resources affected by a project, and to interested agencies, groups, and individuals. Draft EIR reviewers are requested to focus on the sufficiency of the document in

identifying and analyzing a project's possible environmental impacts and ways in which those might be avoided or mitigated.

1.2 TYPE OF ENVIRONMENTAL IMPACT REPORT

This EIR is being prepared as a PEIR in accordance with State CEQA Guidelines Section §15168, which states the following:

a) General. A Program EIR is an EIR, which may be prepared on a series of actions that can be characterized as one large project and are related either:

1) Geographically,

2) As logical parts in the chain of contemplated actions,

3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or

4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

b) Advantages. Use of a Program EIR can provide the following advantages. The Program EIR can:

1) Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action,

2) Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis,

3) Avoid duplicative reconsideration of basic policy considerations,

4) Allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts, and

5) Allow reduction in paperwork.

c) Use with Later Activities. Subsequent activities in the program must be examined in the light of the Program EIR to determine whether an additional environmental document must be prepared.

1) If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration.

2) If the agency finds that pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required.

3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into subsequent actions in the program.

4) Where the subsequent activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were covered in the program EIR.

5) A program EIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed analysis of the program, many subsequent activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.

This PEIR is intended to serve as the primary environmental document for all entitlements associated with the Project, including all discretionary approvals requested or required to implement the Project. The City of Downey, as Lead Agency, can approve subsequent actions without additional environmental documentation unless otherwise required by CEQA Statutes §21166 of the and State CEQA Guidelines §15162. CEQA Statue §21166 states that:

> When an environmental impact report has been prepared for a project pursuant to this division, no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency, unless one or more of the following events occurs:
>
> (a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report.
>
> (b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.
>
> (c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

1.3 STANDARDS OF ADEQUACY UNDER CEQA

While State CEQA Guidelines §§15120 to 15132 generally describe the content of an EIR, CEQA does not contain specific, detailed, quantified standards for the content of environmental documents. State CEQA Guidelines §15151 states:

> An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision that intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR

inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have not looked for perfection but for adequacy, and a good faith effort at full disclosure.

1.4 RESPONSIBILITIES OF THE LEAD AGENCY

The City of Downey is the Lead Agency under CEQA for purposes of RLASCSP implementation. Public agencies are required to make appropriate findings for each potentially significant environmental impact identified in an EIR if it decides to approve a project. If an EIR identifies significant environmental impacts that cannot be mitigated to a less than significant level through adoption of mitigation measures or alternatives, the Lead Agency (and responsible agencies using this CEQA document for their respective permits or approvals) must decide whether a project's benefits outweigh any identified significant environmental effects that cannot be mitigated to below a threshold of significance. If the agency (Lead Agency or Responsible Agency) decides that the overriding considerations, including Project benefits, outweigh the unavoidable impacts, then the agency is required to adopt a Statement of Overriding Considerations, which states the reasons that support its actions.

The Lead Agency's actions involved in Project implementation are described in **Section 3.0: Project Description**. Other agencies that may have discretionary approval over the Project, or components thereof, including responsible and trustee agencies, are also described in the **Section 3.0**.

1.4.1 Notice of Preparation, Scoping, and Opportunities for Public Input

CEQA encourages lead agencies to solicit and consider input from other interested agencies, citizen groups, and individual members of the public as early as possible in the EIR process. CEQA also requires a project to be monitored after it has been approved to ensure that mitigation measures are carried out. CEQA requires the Lead Agency to provide the public with a full disclosure of the expected environmental consequences of a proposed project and with an opportunity to provide comments.

The following process was used to obtain input regarding the Project, and in accordance with CEQA, the PEIR. Throughout the preparation of the RLASCSP and PEIR, the City engaged with and collected input from community residents and stakeholders through various community outreach activities.

- On November 16, 2017, the City held a Community Workshop for the Project. Attendees learned about the planning process, Project goals and objectives, and the overall Project overview. Workshop attendees also participated in an interactive Post-It note "brainstorming" exercise to identify treasures, challenges, and visions of the RLASCSP area. Participants had the opportunity to provide their thoughts, concerns, and hopes for the future of this corner of the City.
- On April 30, 2018, the City held a Land Use Workshop that focused on specific uses and interrelationship of existing and planned land uses within the RLASCSP area.
- The City prepared and distributed a Notice of Preparation (NOP) that was available for public review between February 14, 2019 and March 15, 2019. Responses received on the NOP have been considered in this EIR, as described further below.

Pursuant to State CEQA Guidelines §15206, the Lead Agency is required to conduct at least one scoping meeting for all projects of statewide, regional, or area-wide significance. The scoping meeting is for

jurisdictional agencies and interested persons or groups to provide comments regarding, but not limited to, the range of actions, alternatives, mitigation measures, and environmental effects to be analyzed. The City of Downey hosted a scoping meeting on February 25, 2019, in the Barbara J. Riley Community Center, Downey, California. The meeting was attended by 31 individuals, City staff, and consultants. Environmental issues raised included transportation, air quality, roadway capacity, local/common wildlife and feral cat population, public safety, and hazardous materials (related to demolition).

Table 1-1: Summary of Written Comments on Notice of Preparation, summarizes the comments received from agencies/persons during the NOP process and provides a reference, as applicable, to the PEIR section(s where the issues are addressed. The NOP and all comment letters are provided in **Appendix A: Notice of Preparation and Comment Letters**.

Table 1-1: Summary of Written Comments on Notice of Preparation

Commenter (Date of Letter)	Summary of Comment and Where Addressed
Federal Agencies	No federal agencies submitted comments in response to the NOP.
State Agencies	
State of California Native American Heritage Commission (March 6, 2019)	**Archaeological Resources** – Follow procedure; contact all tribes traditionally and culturally affiliated with geographic area *See* **Section 4.4, Cultural Resources**
State of California Department of Toxic Substances Control (March 11, 2019)	**Hazards and Hazardous Materials** – Identify and determine whether current or historic onsite uses have resulted in release of hazardous wastes/substances – Identify known or potentially contaminated sites within Project area – For identified sites, evaluate whether conditions pose threat to human health or the environment – Outline health and safety procedures to implement if soil contamination is suspected during Project construction *See Section 4.7, Hazards and Hazardous Materials*
State of California Department of Transportation (Caltrans) (March 13, 2019)	**Transportation** – Include the following items in transportation analysis: ○ Assignment of direct and cumulative trips to state facilities from Project vicinity[1] ○ Inbound and outbound trip generation ○ Intersections on State Route (SR) 105 and SR-710 proximate to Project site[1] ○ Capacity analysis at SR-105 and SR-710 proximate to Project site[1] ○ Consider move towards Vehicle Miles Travelled (VMT) in place of Level of Service (LOS) *See Section 4.13, Transportation*
Local Agencies, Special Districts	
Los Angeles County Metropolitan Transportation Authority (letters dated August 3, 2018 and March 15, 2019)	**Aesthetics** – Integrate art and culture into public spaces *See Section 4.1, Aesthetics*

Table 1-1: Summary of Written Comments on Notice of Preparation

Commenter (Date of Letter)	Summary of Comment and Where Addressed
	Population and Housing – Identify different population groups to understand social dynamics and any possible social equity concerns in the study area – Describe how different land uses and vision was established – Job opportunities that will be offered through the Flex Tech/Bio-Medical Sub-District – Residential uses for affordable housing through the study area *See Section 4.11, Population and Housing* **Transportation** – Parking strategies and public transit for employees – Safe access for vehicles, cyclists and pedestrians will be planned for connectivity within the four districts – Opportunities for non-motorized transportation within the RLASCSP area – Impacts on non-motorized transportation modes and access *See Section 4.13, Transportation*
Interested Parties	
Renee Acero, City of South Gate Resident (March 12, 2019)	**Aesthetics** – Visual impact of proposed County of Los Angeles parking structure[1] *See Section 4.1, Aesthetics* **Air Quality** – Air quality impacts resulting from increased traffic and rail transit *See Section 4.2, Air Quality* **Public Safety** – Jurisdictional boundaries and service ratios for police protection services *See Section 4.12 Public Services* **Traffic** – Congestion impacts on Gardendale Avenue – Maintenance of roadway infrastructure – Traffic generated by the project *See Section 4.13, Transportation* **Neighboring Communities** – Effects of implementation on the Hollydale Neighborhood *See Section 2.0, Cumulative Impacts*
Andrea Paulino, Hollydale Resident (March 11, 2019)	– Future plans for current County of Los Angeles Probation Department property on Imperial Highway[2]

Notes:

[1] Trip (direct and cumulative) assignment, intersections, and roadway capacity are part of the level of service (LOS) analysis. Senate Bill 743 (SB 743) (Steinberg, 2013) updated the way transportation impacts are measured in California. Specifically, automobile delay, as measured by LOS and other similar metrics, generally no longer constitute a significant environmental effect under CEQA. (PRC §21099, subd. (b)(3).) Because these LOS-based analyses are no longer required under CEQA, they are not addressed in this PEIR.

[2] The parking structure is part of the County of Los Angeles Project and is not within the Project's scope. No further analysis is required.

[3] Future plans for the Probation Department are not within the Project's scope. No further analysis is required.

1.4.2 Scope of Environmental Analysis

This PEIR assesses the potential environmental impacts that could occur with Project implementation. Potentially significant environmental impacts including issues raised in public comments received in response to the NOP and at the public scoping meetings are evaluated in this PEIR.

The scoping process has determined that the Project could result in significant environmental impacts concerning the following resources, which are addressed in this PEIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services and Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

1.4.3 Report Organization

Pursuant to the State CEQA Guidelines, §15120(c), this PEIR contains the information and analysis required by State CEQA Guidelines §§15122 through 15131. Each of the required elements is covered in one of the PEIR chapters and appendices, and organized as follows.

- **Executive Summary**. A summary description of the proposed Project, the alternatives, their respective environmental impacts, and the Environmentally Superior Alternative.
- **Introduction**. A discussion of the Project background, purpose, and need, briefly describing the proposed Project, and outlining the public agency use of the PEIR.
- **Basis of Cumulative Impacts.** A description of the approach to cumulative impacts analysis.
- **Project Description**. This section identifies the project location, objectives, and key characteristics and includes a list of anticipated discretionary actions.
- **Environmental Analysis**. A comprehensive analysis and assessment of impacts and mitigation measures for the proposed Project. This chapter is divided into separate chapters for each environmental resource area and contains the environmental settings and Project impacts. A description of the approach to cumulative impacts analysis is presented in Section 3.0, and cumulative impacts are analyzed at the end of each environmental resource area section.
- **Additional CEQA Considerations**. A discussion of growth-inducing effects, long-term implications of the proposed Project, and significant environmental effects which cannot be avoided if the proposed Project is implemented.
- **Alternatives to the Proposed Project**. This chapter provides a description of the alternatives evaluation process, as well as a description of alternatives considered but eliminated from further

analysis and the rationale thereof. This chapter also includes an analysis and assessment of impacts for alternatives retained, including the No Project Alternative and the Environmentally Superior Alternative.

- **Effects Found Not to be Significant.** A discussion about the issues identified as "no impact" in the NOP.
- **List of Preparers.** Identifies Lead Agency, Project applicant, and CEQA consultants.
- **Appendices.** The appendices include the Draft PEIR NOP, comments received in response to the NOP and the City's scoping activities, and background technical studies prepared for the Project.

1.5 INCORPORATION BY REFERENCE

Pertinent documents relating to this PEIR have been cited in accordance with State CEQA Guidelines §15148 or have been incorporated by reference in accordance with State CEQA Guidelines §15150, which encourage incorporation by reference as a means of reducing redundancy and the length of environmental reports. The following documents are hereby incorporated by reference into this PEIR and are available for review at the City of Downey Community Development Department, 1111 Brookshire Avenue, Downey, California 90241, and on the City's website at https://www.downeyca.org/our-city/departments/community-development/planning/. Information contained within these documents has been used for various sections of this PEIR.

City of Downey Vision 2025 General Plan. The City of Downey adopted the Vision 2025 General Plan (DGP) in 2005. The General Plan constitutes the City's overall plans, goals, and objectives for land use within the City's jurisdiction. The General Plan addresses a broad range of issues relating to the community's physical, economic, and social development. It contains an evaluation of existing conditions and provides the long-term goals and policies necessary to guide growth and development in the direction that the community desires. Through the Goals, Objectives, Policies, and Programs it contains, the General Plan serves as a decision-making tool to guide future growth and development decisions. The DGP has the following nine chapters:

- Land Use
- Circulation
- Housing
- Conservation
- Safety
- Noise
- Open Space
- Design
- Economic Development

The DGP was used throughout this PEIR where it provides information, policies, and regulations relevant to the proposed Project.

City of Downey Vision 2025 General Plan Environmental Impact Report (State Clearinghouse [SCH] No. 200431159). The DGP EIR analyzed the potential environmental impacts associated with DGP implementation. The General Plan EIR was prepared as a programmatic EIR and addresses the scope of a series of actions and approvals that may be considered as one large project, and are related either geographically or as logical parts in the chain of contemplated actions. The GP EIR estimates the forecast capacity at the City's buildout as 36,915 dwelling units and a population of 121,063 persons. Buildout was

estimated to occur over 20 years. The GGP FEIR concluded significant and unavoidable impacts concerning Air Quality, Noise, and Traffic and Circulation (DGP EIR page 2-3). The DGP EIR was used in this PEIR as a source of baseline data and cumulative impacts for buildout of the City.

City of Downey Municipal Code. The City of Downey Municipal Code (DMC) regulates land use and activities within the City's jurisdiction including, zoning regulations (codified in DMC §9102). Downey Municipal Code Chapters one through eight of Article IX are referred to as The Comprehensive Zoning Ordinance of the City of Downey (Zoning Ordinance) and is the primary tool for implementing the Downey General Plan's plans, goals, and objectives. The DMC is referenced throughout this PEIR to establish the Project's minimum requirements according to DMC regulations. The DMC can be accessed online at: http://qcode.us/codes/downey/?view=desktop.

Rancho Los Amigos South Campus Specific Plan. The Rancho Los Amigos South Campus Specific Plan (Kimley-Horn, 2021) is a pertinent document related to the subject of this Draft PEIR. It has been cited and incorporated by reference in accordance with State CEQA Guidelines §15150 as a means of reducing the redundancy and length of this PEIR.

Rancho Los Amigos South Campus Project Final Environmental Impact Report (SCH No. 2017081017). The County prepared the Rancho Los Amigos South Campus Project EIR (County Project EIR) to evaluate potential environmental impacts associated with proposed County facilities on 74 acres of County-owned land within the project site's boundaries. As the separate but parallel County Project and the City RLASCSP Project planning and environmental documents make their way through the local government review and entitlement processing, the City recognizes the need for consistency between the documents. To ensure consistency between documents, this PEIR incorporates portions of the County Project EIR findings where appropriate and applicable. The County Project EIR was certified and a project approved on June 23, 2020, and is available for reference at: https://ceqanet.opr.ca.gov/Project/2017081017.

1.6 AVAILABILITY OF THE DRAFT PEIR

The City will file a Notice of Completion (NOC) with the State Clearinghouse, indicating that this Draft PEIR has been completed and is available for review and comment. This Draft PEIR will be available for review by the public and interested parties, agencies, and organizations for a review period of at least 45 days, as required by California law. During this period, public agencies and members of the public may provide written comments on the Draft PEIR analysis and content. To elicit a written response for inclusion within the Final PEIR, all comments on this Draft DEIR must be received within the public review period. Comments should be submitted in writing during the public review period to:

City of Downey
11111 Brookshire Avenue
Downey, California 90241
Contact: Mr. Guillermo Arreola
(562) 904-7154
garreola@downeyca.org

Pursuant to state law (PRC §21091(d)(3)), the City will accept email comments in lieu of mailed or hand-delivered comments; however, reviewers are encouraged to follow up any email comments with letters.

In reviewing a Draft EIR, readers should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and on ways in which the significant effects of the Project might be avoided or mitigated.

There will be a public hearing before the Planning Commission during the 45-day public review and comment period for this PEIR to solicit comments on the adequacy and accuracy of information presented in this Draft PEIR.

The Draft PEIR and the full administrative record for the Project, including all studies, is available for review during normal business hours Monday through Friday, 8:00 AM to 5:00 PM, at the City of Downey Community Development Department, located at 11111 Brookshire Avenue.

Additionally, copies of the Draft PEIR and technical appendices are available at the reference desk of the following libraries and on the City's website.

City of Downey Library, 11121 Brookshire Avenue, Downey CA 90241

The Draft PEIR and technical appendices can also be accessed at the City's website: www.downeyca.org/our-city/departments/community-development/planning/environmental-planning.

The City will subsequently respond to each comment on the Draft PEIR received in writing during the public review period through a Responses to Comments document for the Final PEIR. All persons who commented on the Draft PEIR will also be notified of the availability of the Final PEIR and the date of public hearings before the City of Downey.

1.7 FINAL PEIR PROCESS

Following the close of the Draft PEIR public review and comment period, a Final PEIR will be prepared to respond to all substantive comments related to environmental issues surrounding the content of the Draft PEIR. Pursuant to State CEQA Guidelines §15088.5(f)(2), the City will request that reviewers limit their comments to the content of the Draft PEIR and will respond to all comments related to the disposition of environmental effects made during the Draft PEIR public review period. The Final PEIR will be available prior to Planning Commission and City Council public hearings to consider this Draft PEIR along with the actions within the City's review and discretion to approve; see **Section 2.0, Project Description**.

The City is expected to hold public hearings on the Final PEIR in the fall of 2021. All interested parties are invited to attend the public hearings to provide either verbal or written comments on the Final PEIR. The time and location of the public hearings will be noticed in accordance with applicable noticing requirements and procedures.

2.0 PROJECT DESCRIPTION

2.1 PURPOSE

The purpose of the Project Description is to describe the Rancho Los Amigos South Campus Specific Plan Project (RLASCSP Project or proposed Project) to allow for meaningful review by reviewing agencies, decision-makers, and interested parties. State California Environmental Quality Act (CEQA) Guidelines §15124 (14 California Code of Regulations §15124) requires that an environmental impact report's (EIR) project description contain (1) the precise location and boundaries of a project site; (2) a statement of objectives sought by a project including the underlying purpose of the Project; (3) a general description of a project's characteristics; and (4) a statement briefly describing the intended uses of the EIR, including a list of the agencies that are expected to use the EIR in their decision making, a list of the permits and other approvals required to implement the Project, and a list of related environmental review and consultation requirements required by federal, state, or local laws, regulations, or policies. An adequate project description need not be exhaustive, but should supply the detail necessary for project evaluation.

2.2 PROJECT OVERVIEW

The Draft Rancho Los Amigos South Campus Specific Plan (RLASCSP or Specific Plan) has been prepared to promote future development of the southern portion of the Rancho Los Amigos Campus. The RLASCSP is a City-initiated Specific Plan located completely on land that is owned by the County of Los Angeles (County). Multiple concurrent development projects and studies were in process during the creation of the plan and were considered when developing this Specific Plan. In accordance with the goals of the City of Downey's Vision 2025 General Plan (DGP), the RLASCSP promotes economic development with a focus on a diverse mixture of job-generating land uses. The Specific Plan also prioritizes creating more livable communities with access to both regional transit and promotes alternative transit opportunities. The RLASCSP contains the following chapters: (1) Executive Summary, (2) Project Area Environs, (3) Specific Plan Policy Context, (4) Development Plan, (5) Land Use and Development Standards, (6) Design Guidelines, (7) Implementation and Administration, and (8) Appendices.

Over one-half (approximately 63 percent or 109 acres) of the approximately 172-acre RLASCSP area (RLASCSP area or Specific Plan area), will either remain unchanged, or is committed to other projects being planned and studied by the County[1] and the Los Angeles Metropolitan Transportation Authority (Metro)[2]; see also **Section 2.5.2: Concurrent Studies and Development**. Potential environmental impacts associated with the County and Metro projects are analyzed under separate environmental documents. The County's Rancho Los Amigos South Campus Project (County Project) has been approved and the EIR is incorporated by reference herein; see **Section 1.0: Introduction**. Accordingly, environmental impacts associated with the County and Metro projects are not considered under this Program EIR (PEIR). The remainder of the Specific Plan area (approximately 37 percent or 62.5 acres) comprises the Project site, referred in this PEIR as the Focus Area. The Focus Area is planned and programmed for a mix of transit-oriented residential,

[1] Rancho Los Amigos South Campus Project" (County Project) addressed in Rancho Los Amigos South Campus Project Final EIR (SCH No. 201708017) (Environmental Science Associates, June 2020).

[2] "West Santa Ana Branch Transit Corridor Project" (Metro Project). Notice of Preparation of an EIR (SCH No. 2017061007). (Metro, July 2018).

retail, and office uses. Accordingly, this PEIR analyzes the RLASCSP's proposed development within the Focus Area.

The overall RLASCSP area has four geographical districts: Flex Tech/Bio Medical (FTBM), Regional Public Facilities (RPF), Transit-Oriented Development (TOD), and Community Serving (CS). The Focus Area includes three of the four districts: RPF, TOD, and CS; no FTBM land is located within the Focus Area.

Within the Focus Area, the RLASCSP would allow a maximum development of 700 dwelling units (DUs) and approximately 1,130,000 square feet (SF) of new, non-residential (commercial, retail, office, public facilities, etc.) land uses. The RLASCSP is described in greater detail in **Section 2.7: Project Characteristics**.

2.3 PROJECT LOCATION

The approximately 172-acre Specific Plan area is located at the southwest corner of the City of Downey (City) in the southern portion of Los Angeles County (County). **Exhibit 2-1: Regional Vicinity** depicts the Specific Plan area in a regional context. The Specific Plan area is approximately nine miles southeast of downtown Los Angeles and ten miles northwest of the County of Orange. Regional access is provided via the following freeways: Interstate 5 (I-5), the San Gabriel Freeway (I-605), Interstate 105 (I-105), and Interstate 710 (I-710).

Exhibit 2-2: Local Vicinity depicts the Specific Plan area in a local context. The 62.5-acre Focus Area comprises the southern portion of the Specific Plan area. The Focus Area's southwest corner is bisected by the Union Pacific Railroad (UPRR) corridor, facilitating transit-oriented development in its vicinity. The UPRR corridor limits vehicular access between the RLASCSP's southwest corner and the remainder of the RLASCSP area. **Exhibit 2-3: Specific Plan Area Boundary** identifies the boundaries of the Specific Plan, Focus Area, and ongoing project areas within the Specific Plan area.

Locally, primary vehicular access to the Specific Plan area from the north and south is provided via Imperial Highway and Gardendale Street, respectively. Garfield Avenue is a primary arterial that traverses the southwestern portion of the Specific Plan area in an east-west orientation but provides limited access due to the barrier created by the UPRR corridor. Access to the Specific Plan area from the east and west is limited by the local streets in the surrounding residential neighborhoods, which end in cul-de-sacs. Limited access to the Specific Plan area from the east and west is provided via Laurel Avenue, Erickson Avenue, Dahlia Avenue, and Consuelo Street. Erickson Avenue is the primary local arterial that bisects the Specific Plan area in a north-south orientation, from Gardendale Street to Imperial Highway.

Metro bus lines are currently the only form of public transit in and around the RLASCSP area. Three Metro bus lines (117, 120, and 258) run through or adjacent to the Specific Plan area, with two of those lines (117 and 120) making stops at the Rancho Los Amigos Medical Center from Monday to Friday, 7:30 a.m. to 6:30 p.m. There are existing bicycle lanes along the southern border of the Specific Plan area on Gardendale Street, between Paramount Boulevard and Garfield Avenue.

Exhibit 2-1: Regional Vicinity Map

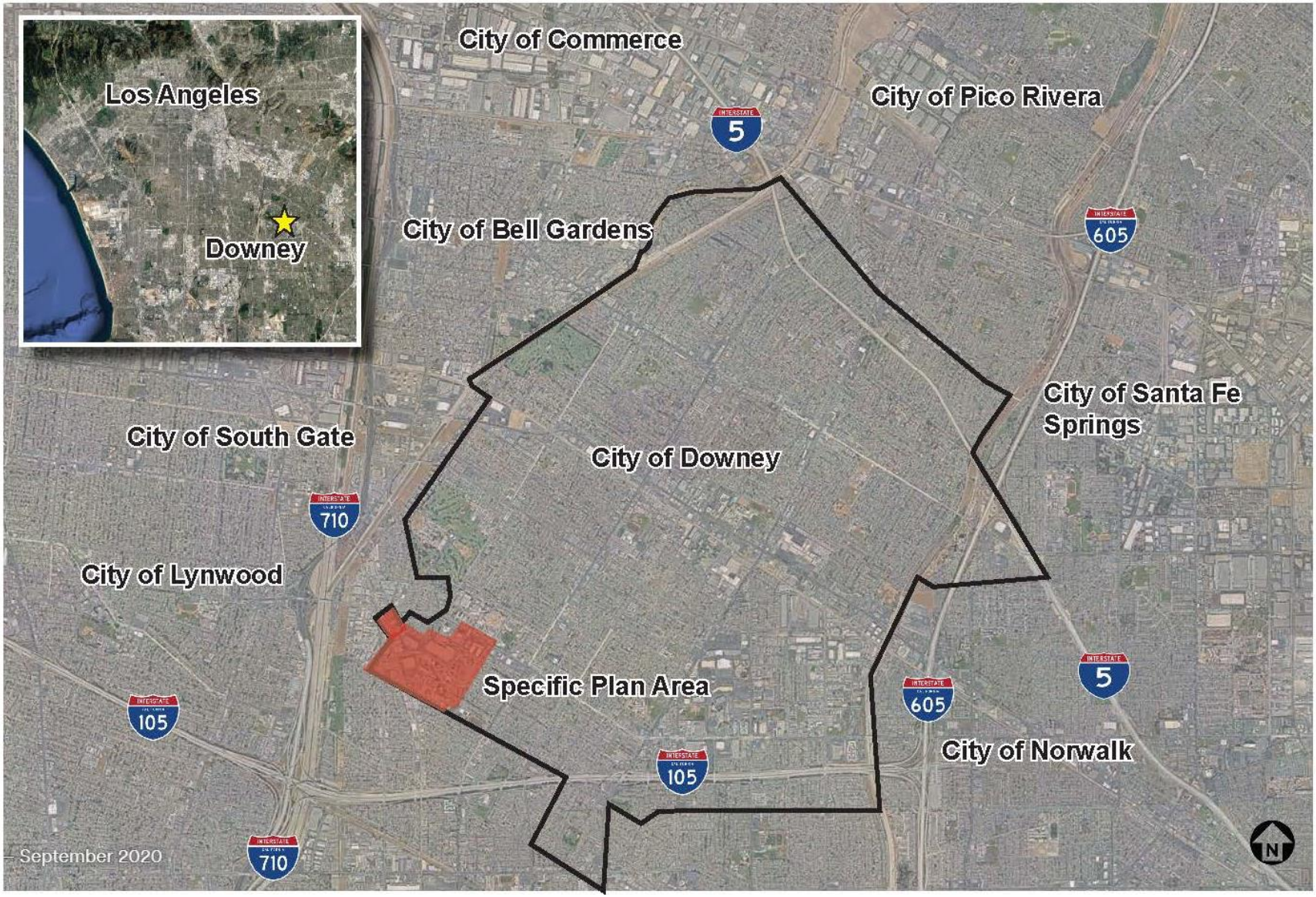


Exhibit 2-2: Local Vicinity Map

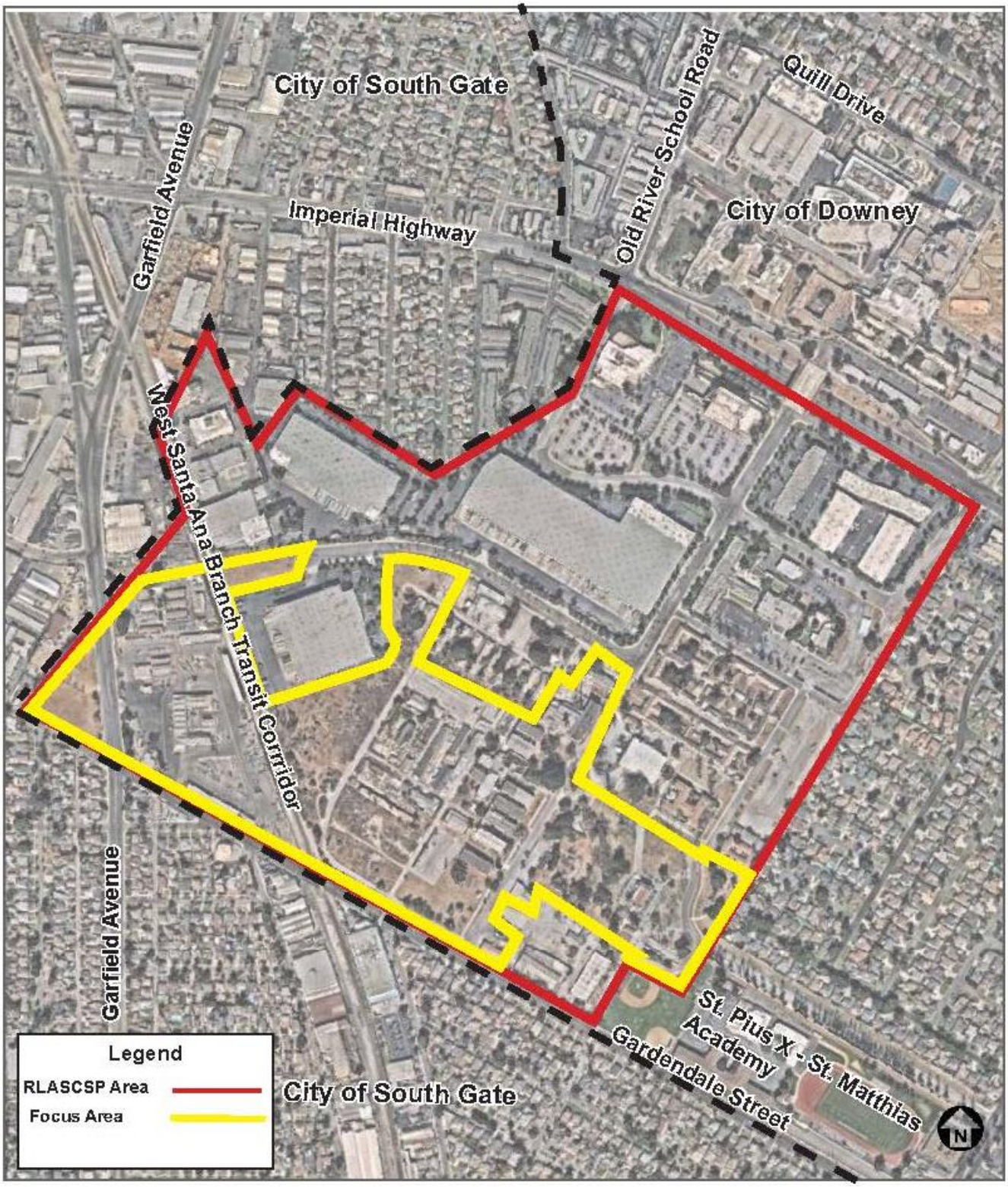
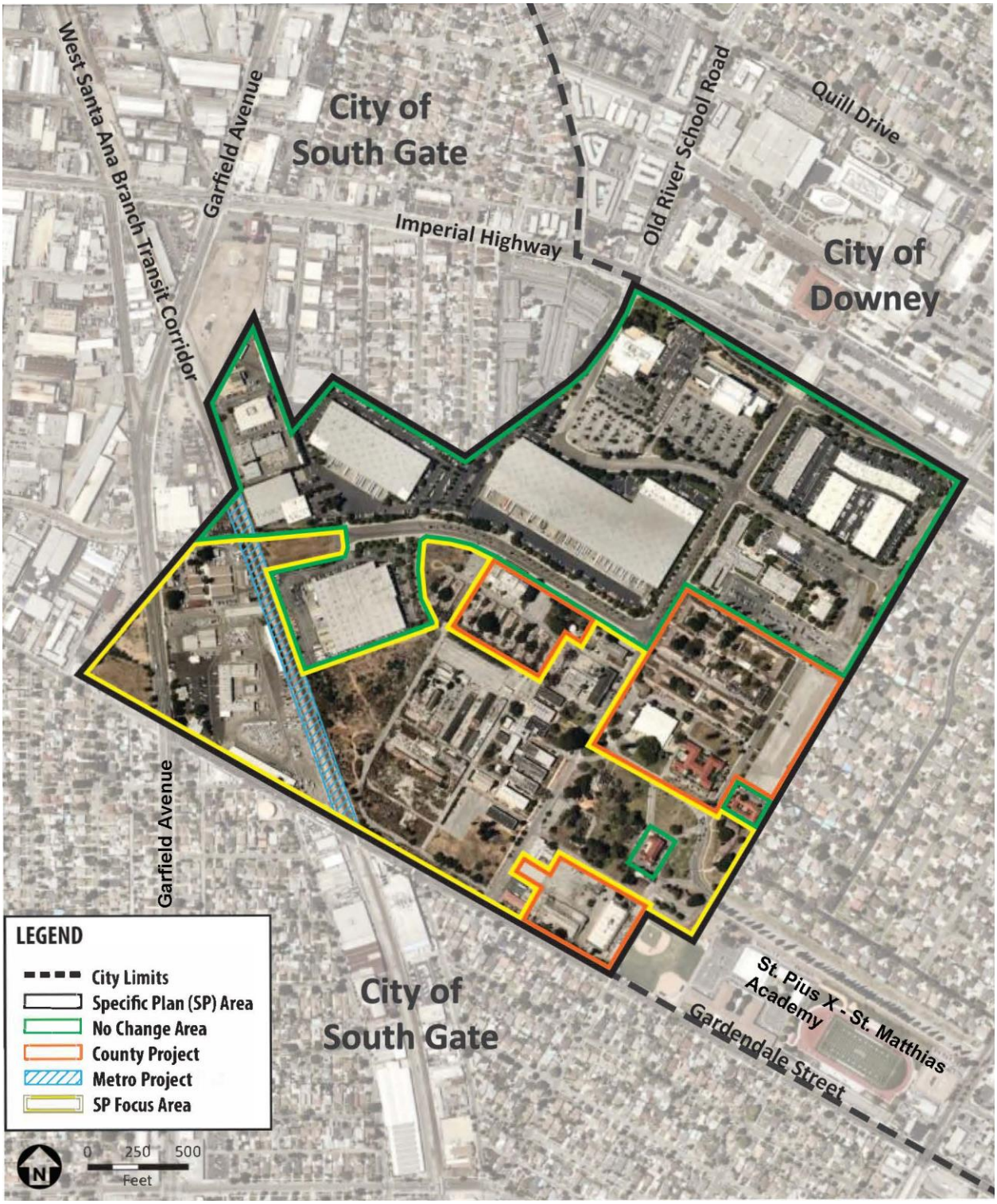


Exhibit 2-3: Specific Plan Area Boundary



2.4 ENVIRONMENTAL SETTING

2.4.1 Historical Context and Setting

The RLASCSP area has a long history of agricultural, medical-related, and social support uses. In 1888, the Los Angeles County Poor Farm (Poor Farm) opened in the Specific Plan area. The area was primarily agricultural in nature and consisted of facilities that provided work opportunities, housing, and medical care for those that were poor or needy. Throughout the first half of the 20th century, the Poor Farm continued to grow in population and was widely recognized as a highly successful agricultural practice within the region.

An emphasis on regional-serving medical facilities became the property's primary use through the development of Rancho Los Amigos National Rehabilitation Center and establishment of the Long-Term Care Facility in 1933.

Consolidation of many of the administrative and primary hospital uses in the 1950s to the present-day Rancho Los Amigos National Rehabilitation Center located north of Imperial Highway signaled the phasing out of many of the facilities in the southern portion of the Rancho Los Amigos Campus. To this day, many of the RLASCSP structures remain vacant and dilapidated but also define the area's environmental setting. **Exhibit 2-4: Existing Historic Structures** shows the historic structures or groupings of structures located within the Specific Plan area. **Section 4.4: Cultural Resources** provides further details on the Specific Plan area's history.

2.4.2 Existing Setting

The City's proximity to both downtown Los Angeles and Orange County uniquely positions it between two major regional employment areas. In addition to convenient access to I-5, I-605, I-105, and I-710, future rail opportunities will further open up Downey residents' access to opportunities throughout the region.

As depicted in Exhibit 2-3, the Specific Plan area is bordered by the following land uses:

- North: Imperial Highway forms the Specific Plan area's northern boundary; Rancho Los Amigos National Rehabilitation Center is north of Imperial Highway
- South: Gardendale Street to the south; single-family residential uses south of Gardendale Street
- East: Single-family residential neighborhood and St. Pius X – St. Matthias Academy
- West: Industrial facilities and single- and multi-family neighborhoods in the City of South Gate

The Specific Plan area currently includes a mix of newer and aging industrial and institutional structures traversed by a defined roadway network in an urban setting. Active commercial manufacturing uses occupy the northern portion of the Specific Plan area, while the southern portion, the Focus Area, is in a generally neglected state with deteriorating structures and unmaintained parcels. The Specific Plan area contains significant areas of impervious surfaces, may contain hazardous materials from past uses and building materials, and is subject to high noise levels from mobile sources (i.e., major roadways and the UPRR corridor) and stationary sources (industrial land uses).

Exhibit 2-4: Existing Historic Structures

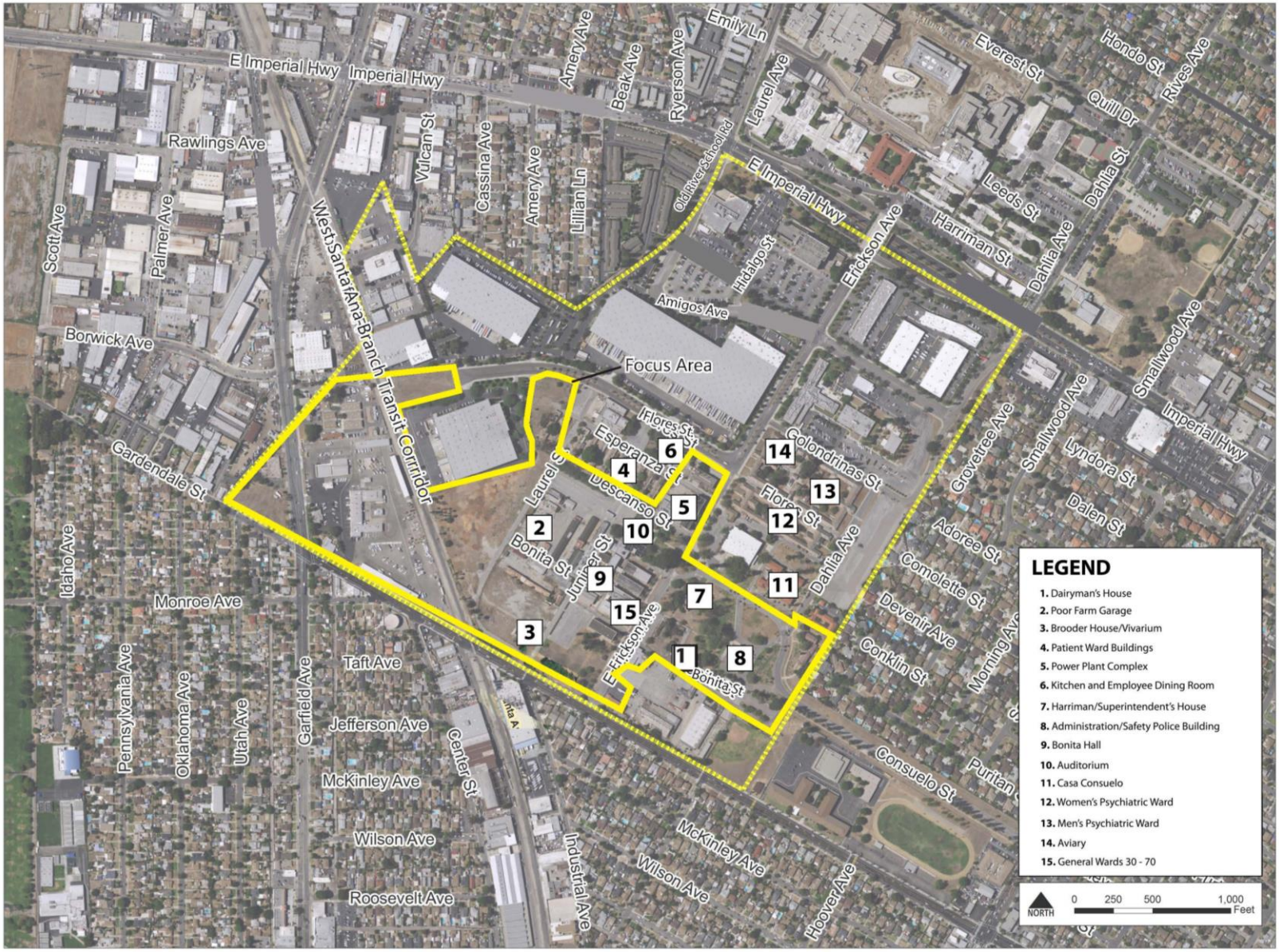


Exhibit 2-5: Existing Land Uses identifies existing land uses. **Table 2-1: Existing Land Use** summarizes the overall Specific Plan area's and Focus Area's existing land use types, acreages, and building square footage. As indicated in **Table 2-1**, most of the Specific Plan area is comprised of industrial uses.

Table 2-1: Existing Land Uses

Land Use Type	Acreage	Building (Square Feet)
Specific Plan Area		
Industrial	40.96	892,340
Institutional	112.64	286,842
Office	12.15	186,450
Vacant	1.07	-
Total	**171.85**	**1,365,632**
Focus Area Only		
Institutional	62.5	286,842
Total	**62.5**	**286,842**

As part of the County's Project, the County approved demolition of all but the following buildings, structures, and features: the Administration Building/Office of Public Safety (LACO No. 1100; Exhibit 2-4, No. 8); Casa Consuelo (LACO No. 1238; Exhibit 2-4, No. 11); Power Plant (LACO No. 1300; Exhibit 2-4, No. 5); the Water Tower (LACO No. 1301; Exhibit 2-4, No. 5); the Shop, Laundry, and Ice Plant (LACO No. 1302; Exhibit 2-4, No. 5); and, the Moreton Bay Fig Tree (south of No. 5). As depicted on Exhibit 2-4, Casa Consuelo (identified as No. 11 on the exhibit) is within the proposed City's Specific Plan area but is outside the boundaries of the Focus Area. These buildings and structures were identified as individually eligible for listing in the National Register of Historic Places. The Moreton Bay Fig Tree was identified as a contributing feature to the Historic District[3]

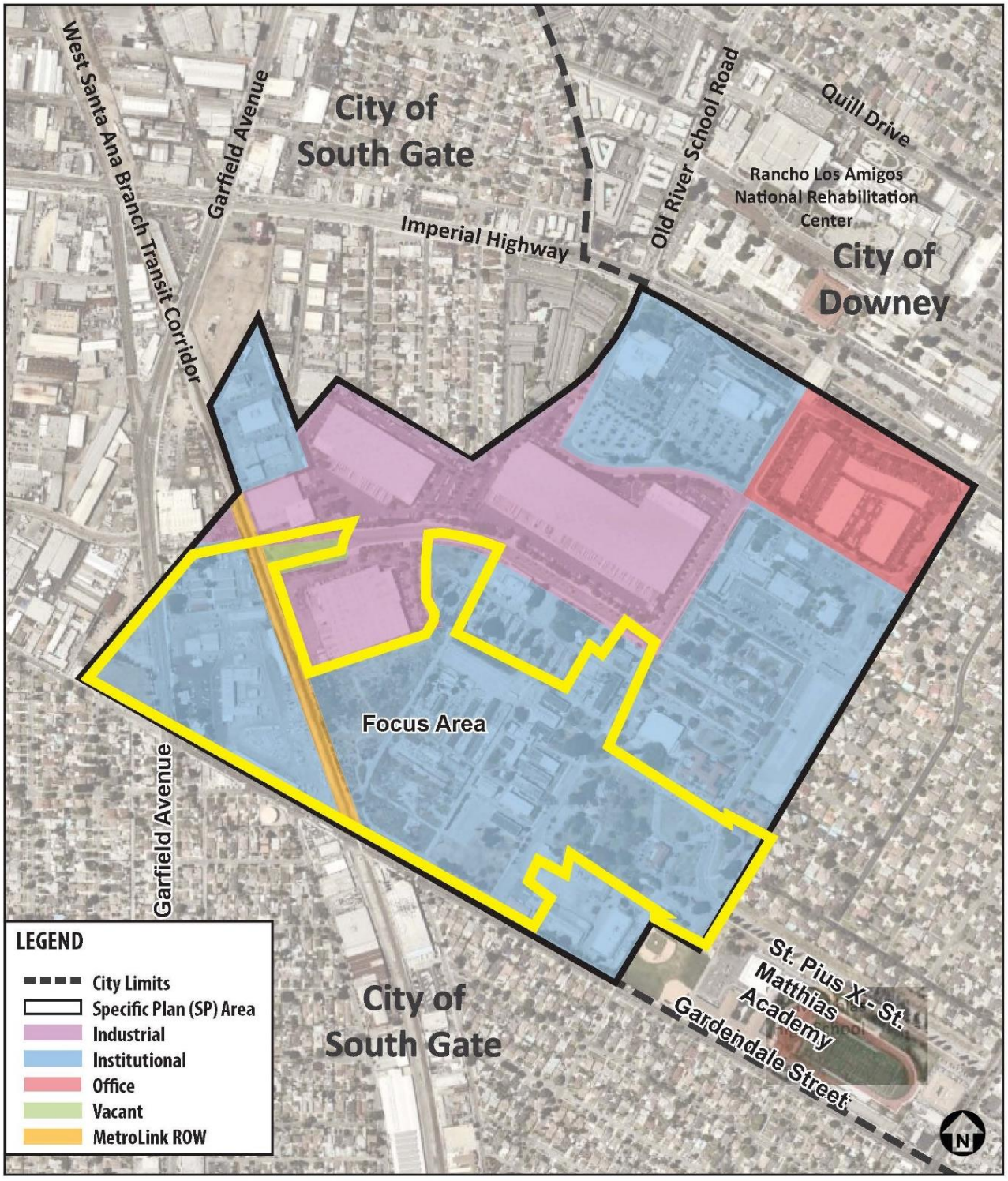
Within the RLASCSP area, the Focus Area is bordered by the following land uses:

- North: Consuelo Street curves through the Focus Area and runs east to west and north to south. Descanso Street runs generally northeast to southwest, and Flores Street generally runs southeast to west along the Focus Area's northern boundary. Existing industrial use buildings and historic structures within the Specific Plan area are located north of these roadways.
- South: Gardendale Street to the south; single-family residential uses south of Gardendale Street
- East: Single-family residential neighborhoods and St. Pius X – St. Matthias Academy
- West: Industrial facilities and single- and multi-family neighborhoods in the City of South Gate

The Focus Area's visual character is influenced by blighted areas, mature ornamental landscaping (trees and shrubs), weedy vegetation, and some historically significant structures identified as contributors to the recognized Rancho Los Amigos Historic District. As depicted in **Exhibit 2-5** and provided in **Table 2-1**, the 62.5-acre Focus Area consists entirely of institutional land uses, with approximately 286,842 SF of existing buildings. Approximately 193,900 SF feet of the existing buildings are vacant and 93,900 SF of existing buildings are occupied.

[3] Environmental Science Associates (October 2019). *Rancho Los Amigos South Campus Project EIR (SCH# 201708017).*

Exhibit 2-5: Existing Land Uses



Most of the Focus Area's vacant buildings are historic structures (Exhibit 2-4). These buildings were formerly used as administrative, patient ward, dining/social, and utility facilities. Occupied Focus Area institutional buildings include a Los Angeles County Public Works facility and storage yard and Los Angeles County Animal Shelter buildings located to the southwest, beyond the UPRR corridor.

2.4.3 Existing Land Use Designations and Zoning

Exhibit 2-6: Existing General Plan Designations depicts the existing onsite and surrounding land use designations. All of the RLASCSP area is designated Commercial Manufacturing (CM), which is intended for the following uses:[4]

> The Commercial Manufacturing designation is intended to provide greater flexibility for providing land uses that generate employment, such as shopping centers, major offices, and light industrial. The intensity of the Commercial Manufacturing designation should fall within a range of floor area ratio between 0.5:1 and 0.6:1.

Exhibit 2-7: Existing Zoning Designations depicts the existing onsite and surrounding zoning. The RLASCSP area is zoned Single-Family Residential (R-1 5,000), Rancho Business Center Specific Plan (SP 88-1), and Rancho Los Amigos Specific Plan (SP 85-1) , with the vast majority defined by the existing Specific Plans, as described below:[5]

- **R-1 5,000** provides for development of single-family residential areas. This zone is further intended to provide a basis for the planning of related amenities, such as parks, schools, public utilities, streets and highways, and other community facilities. "R-1 5000" is a sub-zone within the R-1 designation that requires a minimum lot size of 5,000 SF.[6]
- **SP 88-1** encompasses approximately 121 acres of the RLASCSP. The SP 88-1 designation is intended to provide a comprehensive framework that promotes development of a master planned, light industrial business park.
- **SP 85-1** encompasses approximately 14 acres at the RLASCSP area's northwest corner. The SP 85-1 designation is intended to serve as the first step for future development of light manufacturing within the entire Rancho Los Amigos area.

2.4.4 Infrastructure and Public Services

POTABLE WATER SYSTEM

Water utility service to the RLASCSP area, inclusive of the Focus Area, is provided by the City of Downey Public Works Department - Utilities Division. The City overlies and pumps groundwater from the Central Basin to meet its potable water demand. Recycled water is used to meet demands for non-potable water. While groundwater and recycled water are the City's primary sources of water, the City maintains connections to the Central Basin Municipal Water District (CBMWD) imported water system for emergency purposes.

[4] City of Downey. (2012). *General Plan Land Use Map. Re*trieved from https://www.downeyca.org/home/showpublisheddocument?id=152

[5] Full text for SP 88-1 and 85-1 can be found on the City of Downey's website under Special Zoning.

[6] City of Downey. (2020). *Downey Municipal Code Article IX, Section 3, Section 9312.02*. Retrieved from http://qcode.us/codes/downey/?topic=ix&frames=on.

SANITARY SEWER SYSTEM

Sanitary sewer service to the RLASCSP area is provided by the City of Downey Public Works Department – Utilities Division. The City's sewer system is composed of approximately 200 miles of sewer collection mains, 4,300 manholes, 2 lift stations, and other associated facilities. The sanitary sewer system within the RLASCSP area is a combination of trunk sewer lines owned and maintained by Los Angeles County Sanitation District (LACSD) and collection mains owned and maintained by the Los Angeles County Department of Public Works. Additionally, the City owns and maintains collection mains on the streets adjacent to the RLASCSP area.

LACSD provides wastewater conveyance with approximately 27 miles of trunk sewers and wastewater treatment services through its Joint Water Pollution Control Plant (JWPCP), located at 24501 S. Figueroa Street in the City of Carson. The JWPCP treats approximately 260 million gallons of wastewater per day (mgd).

STORM DRAIN SYSTEM

Storm drainage facilities within the RLASCSP area are owned and maintained by the Los Angeles County Flood Control District (LACFCD) and the Los Angeles County Public Works. The City's storm drain system is comprised of approximately 33 miles of storm drains, 570 manholes, 2 lift stations, 710 catch basins, and other associated facilities.

SCHOOLS

The RLASCSP area is within the Downey Unified School District (DUSD). DUSD facilities include 13 elementary schools (grades K to 5), 4 middle schools (grades 6 to 8), 3 high schools (grades 9 to 12), and an adult school, among other facilities. There are no school facilities located within the RLASCSP area.

2.5 BACKGROUND

2.5.1 Project History

In February 2015, the City received a grant from Metro's TOD Planning Grant Program. The grant's purpose was to assist in funding a Specific Plan for the RLASC area surrounding the future Metro project (see Section 2.5.2). Multiple concurrent development projects and studies were in process during the RLASCSP's preparation and have been considered and acknowledged within this PEIR.

The 172-acre RLASCSP has been prepared to promote future development of the southern portion of the Rancho Los Amigos Campus, which has sat mostly vacant since the consolidation of the Rancho Los Amigos National Rehabilitation Center in the 1980s. The RLASCSP is unique in that it is a City-initiated planning effort located completely on land that is owned by the County.

Exhibit 2-6: Existing General Plan Designations

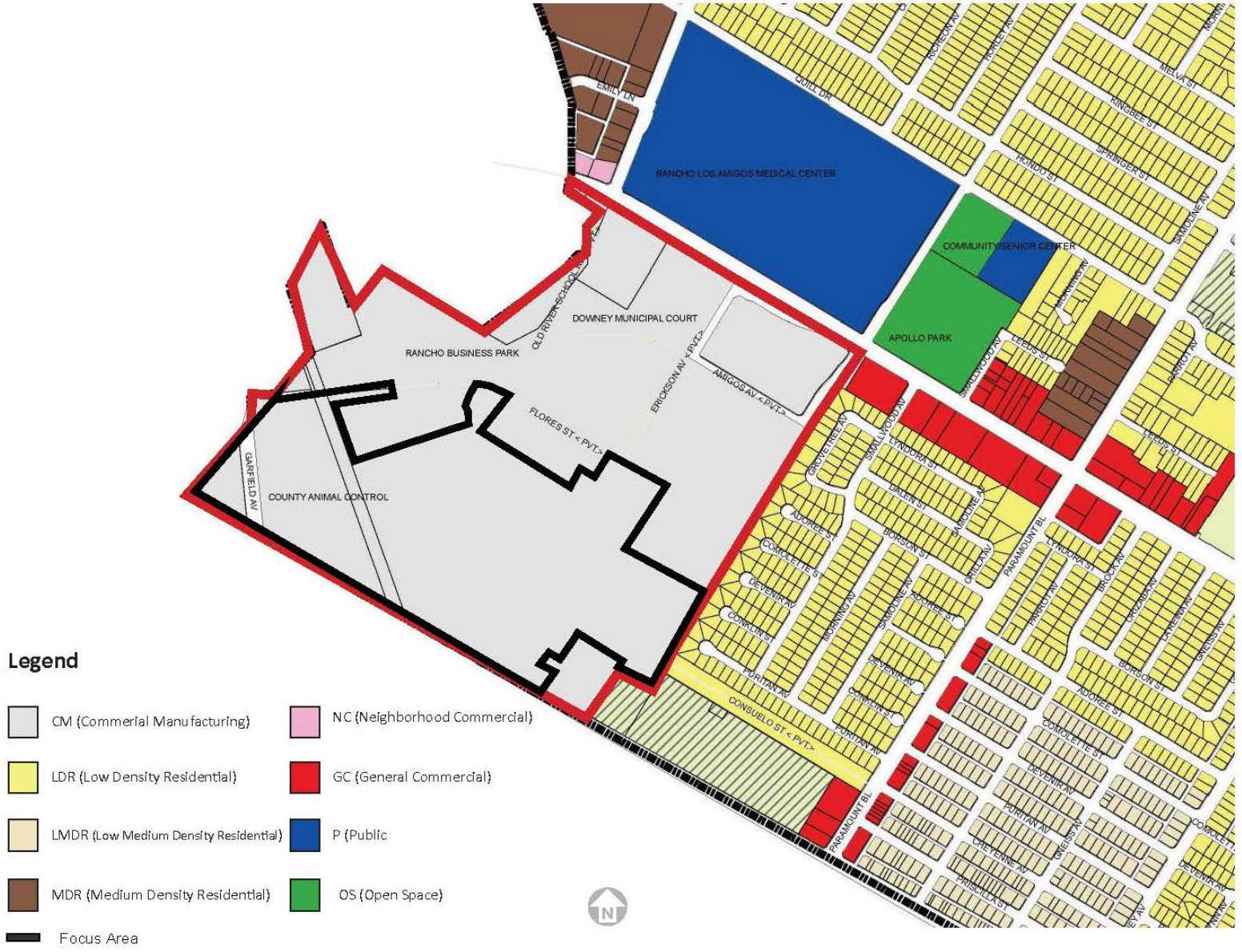
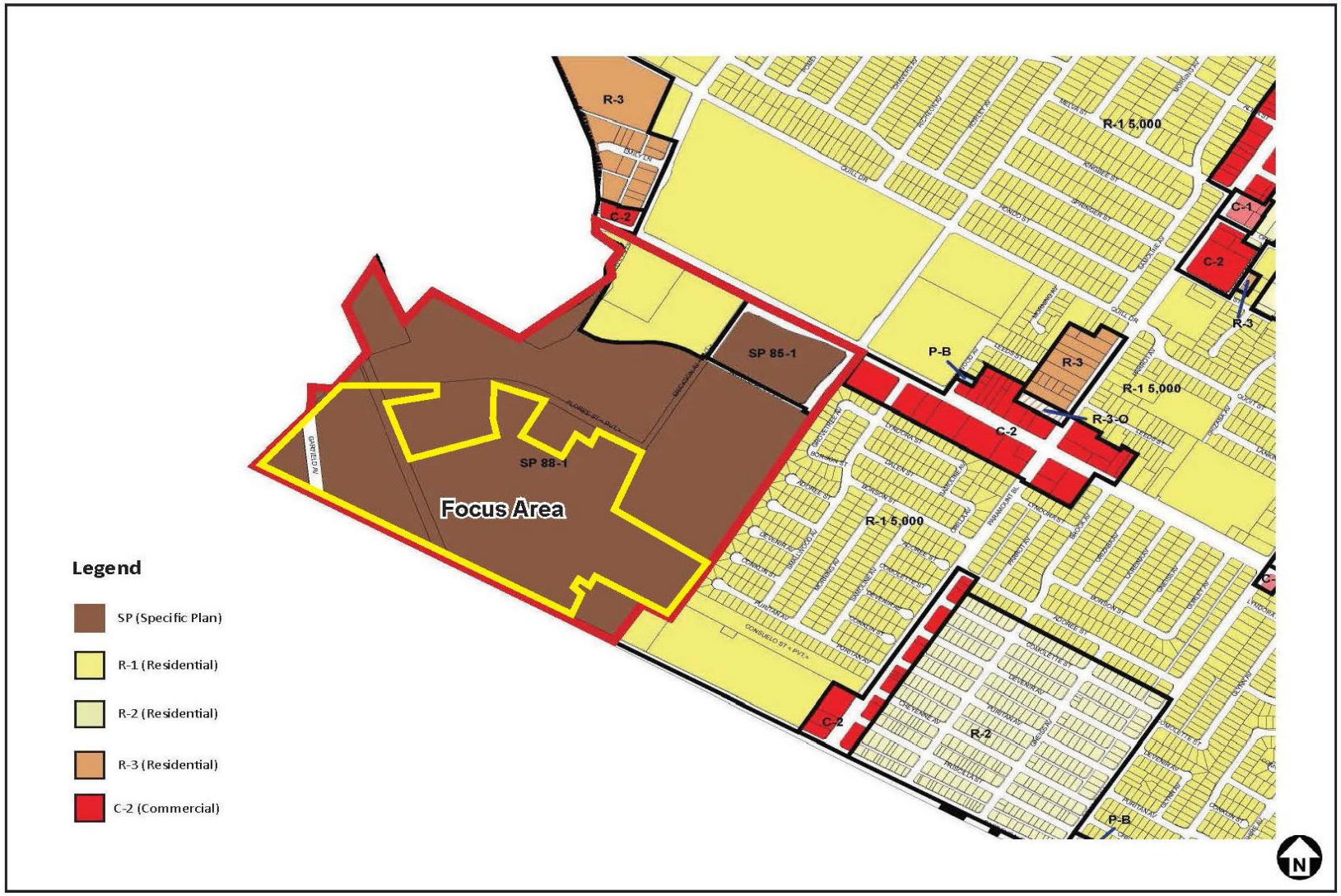


Exhibit 2-7: Existing Zoning Designations



The RLASCSP envisions a TOD with a composition of uses that complement the medical facilities north of Imperial Highway (North Campus), while allowing for the planning and expansion of County regional facilities. The Specific Plan also establishes how to best develop transit-supportive uses around the proposed Metro project, to be located along the southern border of the Specific Plan area. Additional complimentary uses, such as neighborhood commercial and open space nodes and linkages, are included in the Specific Plan. The Specific Plan is proposed to facilitate and encourage enhanced commercial, retail, and mixed-use opportunities, residential development, public spaces and open spaces, an improved pedestrian environment, and a variety of transportation choices to enhance the potential for a multi-modal transportation center.

2.5.2 Concurrent Studies and Development

The Specific Plan area is the subject of a number of current studies and future development plans being planned in a relatively compact geographic area, by different agencies. The following are known efforts in various stages of planning or construction as of the preparation of this EIR:

- **County of Los Angeles, Rancho Los Amigos South Campus Project.** All land within the RLASCSP area is owned by the County. Much of the planning area is currently in use for various County facilities, including the Library Administrative Office, the Public Health Laboratory, a County Public Works facility and maintenance yard, and other County offices. The County's 74-acre South Campus proposes new County facilities on 35 acres of the 74-acre area. Future development plans for the area include an Internal Services Department Headquarters, Probation Headquarters, and County Administrative Offices near the center of Specific Plan area. The final configuration of these buildings totals approximately 650,000 SF, supporting approximately 3,000 County-budgeted positions, the majority of which are currently at other existing County facilities in the region. Additionally, the approved Project retains buildings, structures, and features that were identified as eligible for adaptive reuse or rehabilitation. They are, as referenced in the County Project EIR: Buildings No. 1238 (Casa Consuelo), No. 1300 (Power Plant), No. 1301 (Water Tower), No. 1302 (Shop and Laundry), and No. 1100 (Administration Building), as well as the Moreton Bay Fig Tree. The Final EIR was certified and the Project was approved in June 2020.
- **Metro West Santa Ana Branch (WSAB)/Metro Project**. Metro is developing a new light rail transit line that will potentially connect southeast Los Angeles County with downtown Los Angeles. One of the potential transit stop locations along the alignment is the proposed Gardendale Transit Station to be located along the southern border of the planning area, just north of where the existing rail line meets Gardendale Street. This line would open the planning area and surrounding areas to multiple opportunities in downtown Los Angeles, including employment, leisure, and travel. It is anticipated that TOD compatible uses, such as high-density residential, neighborhood commercial, open space, and job-creating uses will potentially develop around the transit station to take advantage of the increased transit opportunities. A Notice of Preparation of a joint EIR/EIS for the Metro project was published in July 2018; the EIR/EIS is expected to be released for public review in Summer 2021.
- **Downey Sports Complex**. The County and City have approved development of several local multi-use sports fields on approximately five acres in the southern portion of the Focus Area. Facility construction began in March 2021 and completion is anticipated in November 2021. These fields

will be used by local youth recreational leagues as well as the community as an open space asset to the area.

The RLASCSP Project and this PEIR considered these studies and development projects in the context of the site's future uses, cumulative effects, and coordinated planning. The relative acreage of these concurrent planning efforts within the Specific Plan boundaries is shown in **Table 2-2**. This information demonstrates that the majority of the Specific Plan area is accounted for by existing development and other independent projects, resulting in approximately 62.5 acres of Focus Area that are the subject of this proposed Project. This PEIR recognizes that portions of the County's project area overlap with the City's RLASCSP Focus Area.

Table 2-2: Relative Acreage of Concurrent Planning Efforts Within the RLASCSP Boundaries

Description	Unoccupied	Occupied	Open Space/ Other	Total
County Project	-	16.80	5.00	21.80
"No Change" Area	-	84.39	-	84.39
Metro Project	-	-	3.13	3.13
Focus Area	47.75	13.11	1.66	62.52
Total	**47.75**	**114.30**	**9.79**	**171.84**

2.6 PROJECT OBJECTIVES

The following goals were developed for the RLASCSP through extensive community input and focused discussions with all stakeholders and reflect the intentions of the DGP.

- Create a mixed-use, compact, and multi-modal environment
- Promote sustainable principles in design and development
- Enhance the pedestrian scale and function of the built environment
- Establish a complementary mix of cultural uses, public spaces, and outdoor activities
- Create stronger connections with local neighborhoods and connectivity with mobility options
- Promote a family-oriented, culturally enriched, healthy lifestyle
- Celebrate and reinforce Downey's and the Rancho Los Amigos South Campus' character and history
- Enhance economic development successes in the area
- Support a flexible variety of land uses that further regional transportation and transit planning objectives

2.7 PROJECT CHARACTERISTICS

2.7.1 Land Use Plan

In accordance with DGP goals, the RLASCSP Project is intended to promote economic development and revitalization to enhance the City's attractiveness to the local and regional marketplace. The RLASCSP is

anticipated to remove regulatory obstacles to the reuse of existing structures and promote infill development of currently vacant and underutilized properties.

The RLASCSP is intended to provide a complementary mix of commercial, office, residential, and open space uses in a cohesive, friendly environment. The RLASCSP would expand and enhance commercial opportunities to serve a local and regional customer base, allow for and complement the expansion of County regional facilities, and provide opportunities for TOD adjacent to the proposed WSAB Gardendale Transit Station. The RLASCSP is also intended to provide additional public recreational facilities and incorporate adjacent open space, and complement the medical facilities in the North Campus that is located across Imperial Highway. Primary objectives of the RLASCSP are to promote economic development with a diverse mix of job-generating land uses and provide opportunities for more livable communities with access to regional and alternative transportation. The proposed land uses of the Specific Plan are illustrated in **Exhibit 2-8: Proposed Land Uses.**

2.7.2 Sub-Districts

The Land Use Plan for the RLASCSP Area provides for the development and continued planning of four Sub-Districts:

- **Flex Tech/Bio-Medical (FTBM) Sub-District**, intended to promote job-creating uses in fields related to surrounding industries;
- **Regional Public Facilities (RPF) Sub-District,** intended to compliment regionally serving Los Angeles County facilities that are currently under planning and development;
- **Transit-Oriented Development (TOD) Sub-District**, intended to create transit-supportive uses around the future Metro Gardendale Transit Station; and
- **Community Serving (CS) Sub-District**, intended to provide community open space and recreational uses accessible to the surrounding sub-districts and adjacent established neighborhoods.

The Specific Plan area is approximately 172 acres (including rights-of-way). **Exhibit 2-9: Specific Plan Sub-Districts,** depicts the general boundaries for each sub-district within the Specific Plan area. Each sub-district is intended to identify the general emphasis of land use in these geographic areas of the RLASCSP. The Focus Area contains land designated as RPF, TOD, and CS. However, no land is designated as FTBM in the Focus Area. **Table 2-3** summarizes the development standards for each sub-district.

Table 2-3: Development Plan Land Use Summary

Specific Plan Development Standards				
Sub-District	**Minimum Lot Area (SF)**	**Maximum Height (ft)**	**Maximum Density (du/ac)**	**Maximum Intensity (FAR)**
Flex Tech/Bio-Medical (FTBM)	25,000	75 ft/6 stories	60	2.5
Regional Public Facilities (RPF)	25,000	75 ft/6 stories	60	2.5
Transit-Oriented Development (TOD)	25,000	75 ft/6 stories	100	2.5
Community Serving (CS)	10,000	30 ft/2 stories	60	0.5

Exhibit 2-8: Proposed Land Uses

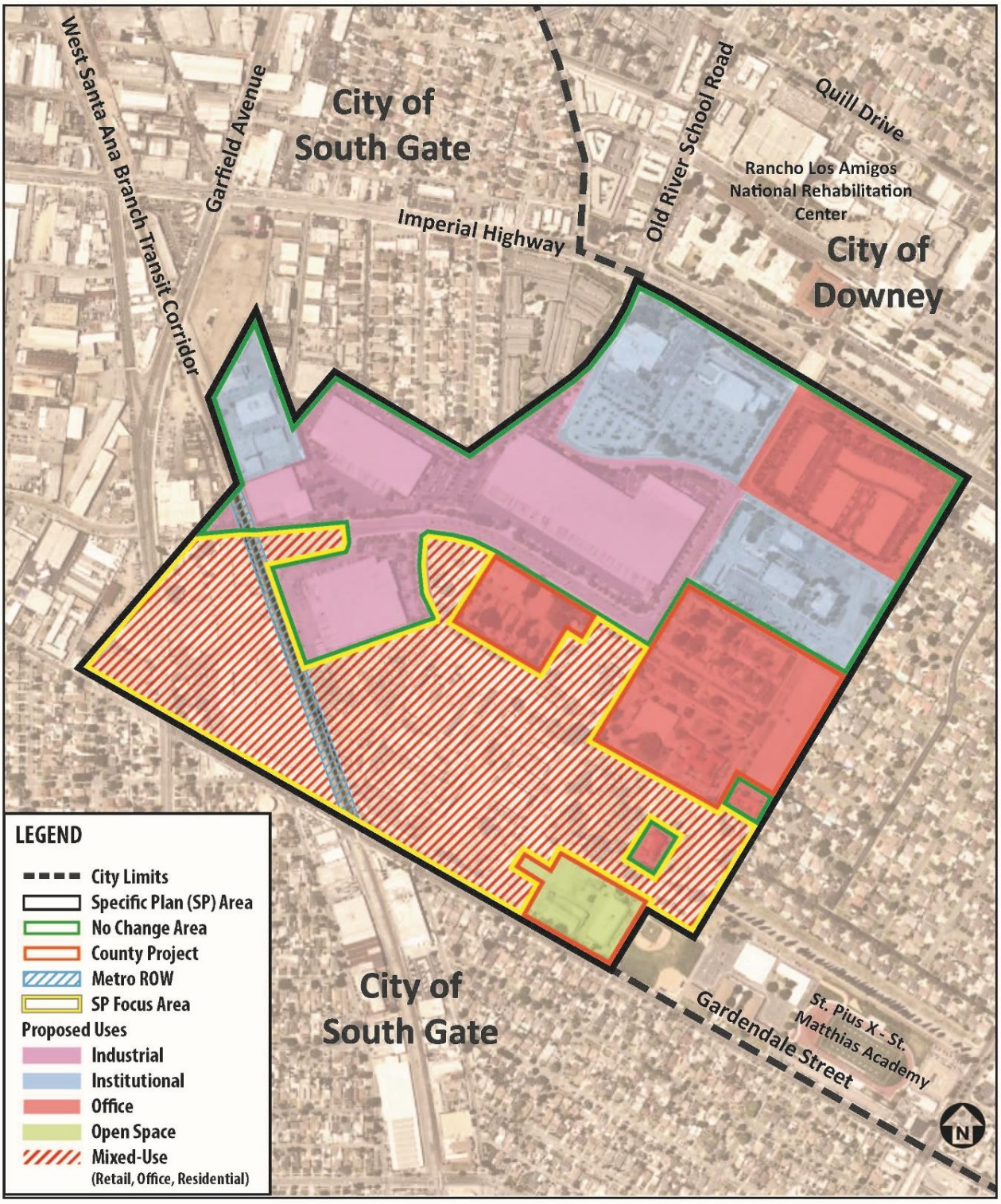
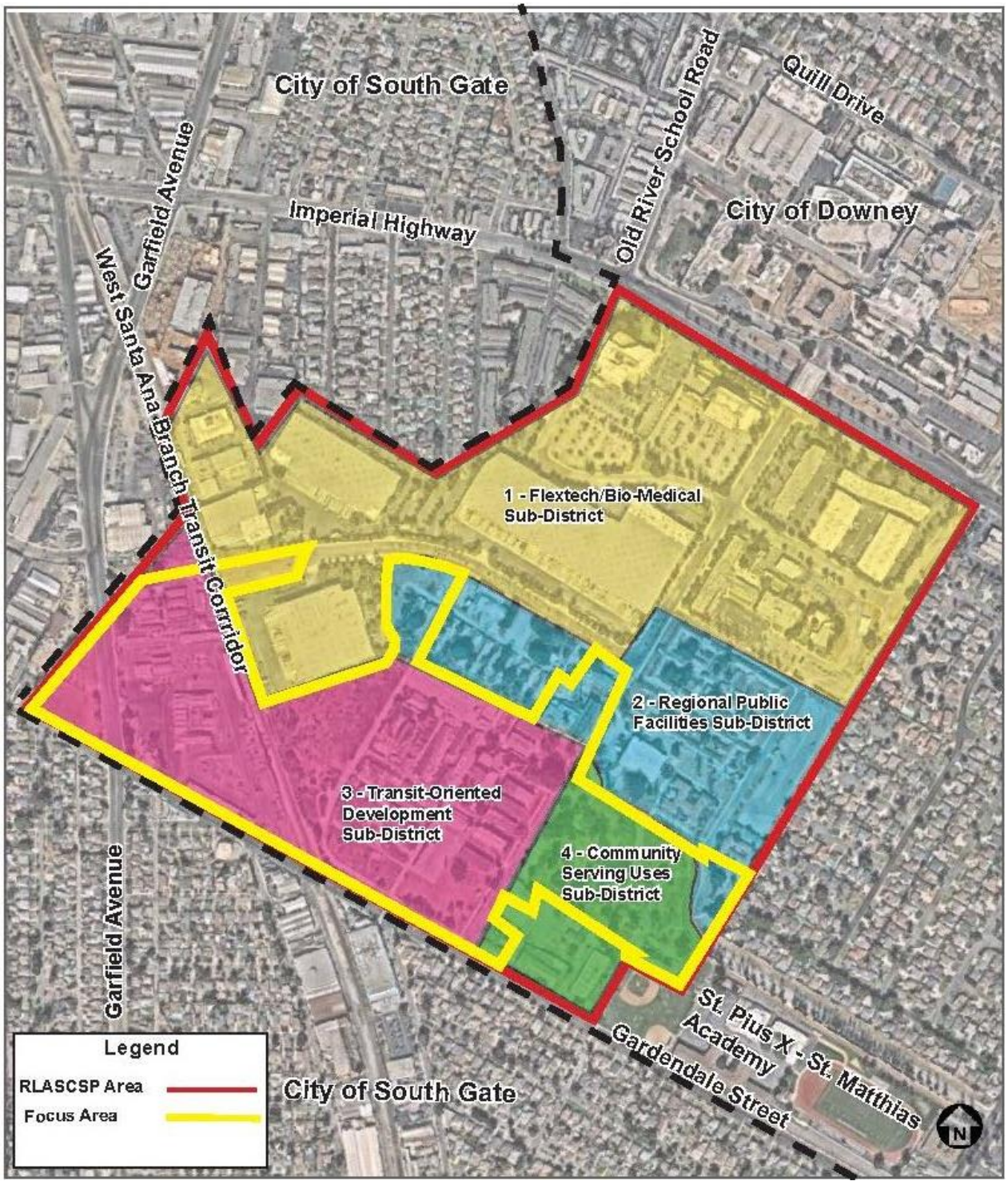


Exhibit 2-9: Proposed Specific Plan Sub-Districts



The Focus Area represents the largest opportunity for new development within the RLASCSP area as it is largely vacant. The Focus Area has a net developable area of 47.8 acres assuming a 20 percent allowance for the circulation system and a 7 percent allowance for landscaping. Accordingly, the Focus Area could accommodate a maximum of 700 DU and 1,130,000 SF of new non-residential (commercial, retail, office, public facilities, etc.) uses.

FLEX TECH/BIO-MEDICAL (FTBM) SUB-DISTRICT

The intent of the FTBM sub-district is to promote job-creating uses in fields related to surrounding industries. The sub-district seeks to complement the Rancho Los Amigos Rehabilitation Center to the north with office/medical office uses that can provide supportive services to one of the largest medical facilities in the region. The FTBM sub-district would integrate existing uses and plan for the long-term potential redevelopment of the large industrial facilities currently in use. This sub-district encourages grouping a range of light industrial, office, and research uses together to create an innovation hub in Downey. The Focus Area does not include this sub-district.

Characteristics

- Existing light industrial/retail and office uses
- Large amounts of surface parking
- North entrance to the RLASCSP area
- Adjacent to the Rancho Los Amigos National Rehabilitation Center

Existing Uses

- L.A. County Public Health Laboratory
- L.A. County Public Library Administrative Office
- Downey Courthouse
- Long-term Industrial facilities

REGIONAL PUBLIC FACILITIES (RPF) SUB-DISTRICT

The intent of the RPF sub-district is to complement regionally serving County facilities that are currently under development. While all sub-districts would accommodate the potential for public uses, the RPF sub-district encompasses the facilities currently under development, including an Internal Services Department Headquarters, Probation Headquarters, and County Administrative Offices.

Characteristics

- Primarily vacant/underutilized buildings
- Some historically significant structures
- Central core of the RLASCSP area
- Future County Administrative Offices

Existing Uses

- Primarily vacant/underutilized buildings

TRANSIT-ORIENTED DEVELOPMENT (TOD) CORRIDOR SUB-DISTRICT

The intent of the TOD sub-district is to create transit-supportive uses around the future Metro Gardendale Transit Station. The future development of this district will be focused around facilitating access to the station, whether through adjacent higher density residential or connective complete street improvements in and around the RLASCSP. Targeted neighborhood serving commercial uses will help support residents and grow the district into a desirable place for professionals who will have the ability to access a large portion of the region for job opportunities.

Characteristics

- Primarily vacant/underutilized buildings
- Bisected by Metro Rail corridor
- Adjacent to some single-family neighborhoods south of Gardendale Street
- Connectivity broken up by Metro Rail Corridor and Garfield Avenue
- Southern entrance to the RLASCSP area

Existing Uses

- Primarily vacant/underutilized buildings
- L.A. County Public Works facility
- L.A. County Animal Shelter
- Primarily vacant/underutilized buildings
- Metro Rail corridor

COMMUNITY SERVING (CS) USES SUB-DISTRICT

The intent of the CS sub-district is to provide community open space and recreational uses accessible to the surrounding sub-districts and adjacent established neighborhoods. The future athletic complex will serve as an anchor for the area, with mature trees and existing landscaped areas.

Characteristics

- Natural open space
- Historically significant buildings (1 still in use currently)
- Vacant/damaged structures
- Future Sports Fields (under construction)
- Adjacent to St. Pius X – St. Matthias Academy
- Southern entrance to the RLASCSP area

Existing Uses

- L.A. County Services Building
- Downey Rose Float

2.7.3 Circulation/Roadway Improvements

LOCAL ROADWAYS

The DGP Circulation Element identifies different roadway classifications for the streets within the City, each with varying sizes, composition, and purposes. The circulation for the Specific Plan will be consistent with existing City roadway classifications, and for efficiency and purposes of historic preservation, will largely use the existing roadway network for internal access and connections to adjacent facilities.

TRANSIT

Metro bus lines are currently the only form of public transit in and around the Specific Plan area. The RLASCSP proposes the future Gardendale Metro Station stop to be located in the Focus Area, along the southern boundary of the Specific Plan area where the rail line meets Gardendale Street. The Gardendale Station would be one of 13 proposed stops along the WSAB Transit Corridor, which is a 20-mile long light rail transit line connecting downtown Los Angeles to southeast Los Angeles County.

Exhibit 2-10: Existing and Future Public Transit, illustrates the existing Metro bus lines and stop locations, along with the proposed WSAB Transit Corridor and proposed Gardendale Metro Station.

BICYCLE FACILITIES

In July 2015, the City adopted its Bicycle Master Plan which identified the following Planned Bicycle Facilities in and around the Specific Plan area.

- Bike Lane with Road Diet (Class II) on Old River School Road north of Imperial Highway;
- Bike Lane with Road Diet (Class II) on Gardendale Street between Hollydale Regional Park and Paramount Boulevard;
- Bike Route (Class III) on Quill Drive between Los Padrinos Drive and Paramount Boulevard;
- Bike Route (Class III) on Rives Avenue north of Imperial Highway;
- Phase II Bicycle Improvements on Old River School Road between Gardendale Street and Imperial Highway (Connects two Class II bike lanes to the future Gardendale Transit Station); and
- Phase II Bicycle Improvements on Rives Avenue between Gardendale Street and Imperial Highway (Connects two Class II bike lanes to the future Gardendale Transit Station).

As public and private projects occur within the Focus Area, planned bicycle facilities will be implemented consistent with existing DGP Circulation Element policies and the Downey Bicycle Master Plan, which encourages road diets (where possible), requiring short term and long term bike racks/lockers/facilities at new residential, commercial and industrial developments, including the addition of the following Class II (on-street striped lanes) bike lanes:

- Imperial Hwy to Gardendale Street adjacent to the east Specific Plan boundary
- Imperial Hwy to Gardendale Street adjacent to the west Specific Plan boundary

These facilities have been considered and incorporated into the Specific Plan. Planned improvements are conceptual in nature and the exact location of facilities will consider future development, design and placement of improvements in the Specific Plan and Focus area.

PEDESTRIAN FACILITIES

Sidewalks currently exist on most streets in the Specific Plan area, although some are narrow or substandard in quality. Sidewalks would be improved as new development occurs, and through the landscaping provisions contained in the RLASCSP. Recommended improvements include:

- Augmented, widened or improved sidewalks along Erickson Avenue and Flores Street
- Installation of improved pedestrian-scaled street lighting.
- Installation of wider sidewalks where feasible as development occurs (e.g., along Consuelo Street and adjacent to future crossing adjacent to Flores Street and Garfield Avenue).
- Add high visibility crosswalks at ingress/egress intersections along Gardendale Street
- Improve pedestrian crossings at Erickson Avenue and Imperial Highway
- Add sidewalk bulb-outs and extensions, or reducing curb returns, on intersection corners where feasible.

Exhibit 2-10: Existing and Future Public Transit

2.7.4 Utility Service

Future development within the Focus Area would necessitate upgrades to existing wet and dry utility systems (i.e., water, wastewater, stormwater, electricity, natural gas and telecommunications). New development would connect to existing City systems adjacent to the RLASCSP area. Fire flow, sewer service, storm drainage, and stormwater quality requirements would be addressed on a project-by-project basis for individual Focus Area projects; see **Section 4.7: Hydrology and Water Quality** and **Section 4.14: Utilities and Service Systems** of this EIR.

2.8 PROJECT PHASING AND CONSTRUCTION

2.8.1 Phasing

The concurrent projects being planned and entitled by the County are proceeding through the environmental review and permit approval process. It is anticipated that the County projects will be implemented in the near term and in advance of new development within the RLASCSP Focus Area.

The Metro station and mixed-use TOD projects would be coordinated to maximize transit opportunities between the new station and new development. As a long range planning document with no specific development proposed within the Focus Area, development phasing will be dictated by future parcelization and market conditions.

2.8.2 Construction

Initial Focus Area construction phases would require strategic demolition and removal of structures, site clearing, potential remediation work, and establishment of staging areas. It is anticipated that construction equipment and materials would be stored at the construction work areas, as development progresses over time.

Given the level site and existing pavement, removal of trees or vegetation for purposes of construction staging is not anticipated. Heavy machinery would not be operated in the staging areas and only motion-censored night-time security construction lighting is proposed.

For purposes of impact analysis, this PEIR assumes construction beginning in late 2021 and buildout by 2035.

2.9 INTENDED USES OF THIS PEIR

Pursuant to State CEQA Guidelines §15121, an EIR is primarily an informational document intended to inform the public agency decision-makers and the public of the potentially significant environmental effects of a project.

2.9.1 List of Agencies

The Lead Agency is the public agency with the primary responsibility for approving a project. Responsible Agencies (public agencies that have a level of discretionary approval over some component of a project) may rely upon the EIR prepared by the Lead Agency (14 CCR §15096). As set forth in State CEQA Guidelines §15124(d), the City of Downey is the Lead Agency, and the responsible and trustee agencies are expected to use the information in this PEIR for consideration of approvals related to and involved in implementing

the RLASCSP. Permits and other approvals required to implement the RLASCSP are identified below. As noted above, this PEIR is intended to be used by agencies in their consideration of approval of required subsequent permits and actions.

Project approval is subject to actions set forth by the City. Adoption of the proposed General Plan Amendments/Zone Changes/Zoning Map Amendments/Community Design Guidelines are subject to review and/or approval by the following agencies:

- City of Downey Planning Commission
- City of Downey City Council
- California Office of Historic Preservation
- California Department of Forestry and Fire Protection (CALFIRE)
- Los Angeles Regional Water Quality Control Board
- California Department of Transportation (Caltrans) District 7
- South Coast Air Quality Management District

2.9.2 List of Permits and Other Approvals

The City of Downey will be responsible for Final PEIR certification, as set forth in State CEQA Guidelines §15090 based on the standards of adequacy for an EIR (State CEQA Guidelines §15151). Final PEIR certification would precede consideration of the following discretionary actions by the City:

- Adoption of the Rancho Los Amigos South Campus Specific Plan: to provide updated community design guidelines and policies.
- General Plan Amendment No. PLN-21-00063: The DGP will be amended concurrent with adoption of the RLASCSP to provide consistency between both documents. The following DGP amendments would occur:
    - Amend the Land Use Map to show the RLASCSP boundaries.
    - Amend the General Plan Land Use Element and Housing Element, and other related conforming General Plan exhibits to ensure that the Specific Plan and General Plan, as amended, are internally consistent.
    - Rescind and replace SP 85-1 and SP 88-1 with the Rancho Los Amigos South Campus Specific Plan area.
- Zoning Text Amendment No. PLN-21-00063: The RLASCSP will be adopted by Ordinance and will become the zoning for the properties within it. This will be accomplished by a zoning map amendment to the "Rancho Los Amigos South Campus Specific Plan" zone and a text amendment to provide a reference to the adopted Specific Plan.
- All consolidations or divisions of land within the Specific Plan area will be processed in accordance with the Downey Municipal Code (DMC) regarding subdivision and parcelization of land as well as the State of California Subdivision Map Act.

Subsequent activities would be examined in light of the Final PEIR to determine whether additional CEQA documentation would be required pursuant to the requirements of CEQA §21166 (i.e., PRC §2116) and State CEQA Guidelines §15162 and §15168 (i.e., 14 CCR) for subsequent approvals including but not limited to the following:

- Site Plans
- Conditional Use Permits
- Tentative Parcel or Tract Maps and Master Plans
- Grading Permits
- Building Permits
- Encroachment Permits

The Final PEIR would also provide environmental information to responsible agencies, trustee agencies, and other public agencies which may be required to grant approvals and permits or coordinate with the City as part of the RLASCSP implementation.

2.9.3 Implementation and Financing

New economic development strategies are necessary to respond to changes in environmental regulation, technology, and lifestyle preferences, and cities will need assistance from the private sector to create further jobs, tax revenue, and housing. To that end, the following post-Redevelopment economic development strategies may be considered to facilitate public-private projects and promote development in the Rancho Los Amigos South Campus Specific Plan area:

- Enhanced Infrastructure Financing Districts (EIFDs)
- Public-private partnerships (P3) project delivery methods
- Development and Disposition Agreements (DDAs)
- Special districts (Business Improvement Districts BIDs)
- Property Assessed Clean Energy Finance Program (PACE)
- Greenhouse Gas Reduction Funds (GGRF)
- Grants/State/Federal Funding Sources (U.S. Economic Development Administration "EDA" Grants, Community Development Block Grants "CDBG," Cap and Trade Funds)

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3.0 BASIS FOR CUMULATIVE ANALYSIS

3.1 INTRODUCTION

State CEQA Guidelines §15355 provides the following definition of cumulative impacts:

Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

a. The individual effects may be changes resulting from a single project or a number of separate projects.

b. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

State CEQA Guidelines §15130 further addresses the discussion of cumulative impacts, as follows:

- An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR.
- If the combined cumulative impact associated with the project's incremental effect and the effects of other projects is not significant, the EIR should briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR.
- If the combined cumulative impact associated with the project's incremental effect and the effects of other projects is significant, the EIR must determine whether the project's contribution is cumulatively considerable.
- The EIR may conclude the project's contribution to a significant cumulative impact is less than cumulatively considerable and thus is not significant, if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact.

Pursuant to State CEQA Guidelines §15130(b), the discussion of cumulative impacts shall be guided by the standards of practicality and reasonableness, and should include the following elements:

1. Either:

   A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the Agency, or

   A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projects may be supplemented with additional

information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

2. When utilizing a list, as suggested in paragraph (1) of subdivision (b), factors to consider when determining whether to include a related project should include the nature of each environmental resource being examined, the location of the project and its type. Location may be important, for example, when water quality impacts are at issue since projects outside the watershed would probably not contribute to a cumulative effect. Project type may be important, for example, when the impact is specialized, such as a particular air pollutant or mode of traffic.
3. Lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used.
4. A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available.
5. A reasonable analysis of the cumulative impacts of the relevant projects, including examination of reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.

To determine the Project's potential cumulative impacts, this EIR uses a list of past, present, and probable future projects producing related or cumulative impacts; see **Section 3.2: Cumulative Projects**. The cumulative impacts analyses are provided in **Sections 4.1** through **4.15**. These analyses describe the potential environmental changes to the existing physical conditions that may occur as a result of the proposed Project together with past, present, and probable future projects within its vicinity.

3.2 CUMULATIVE PROJECTS

The related projects and other possible development in the area determined as having the potential to interact with the proposed Project, to the extent that a significant cumulative effect may occur, are outlined in **Table 3-1: Cumulative Projects** and depicted on **Exhibit 3-1: Cumulative Project Locations**. As indicated in the table, the cumulative projects involve approximately 1,033 dwelling units (DU) and approximately 2,459,000 square feet (SF) of non-residential land uses.

The cumulative projects list provided in the table was derived as follows:

- City of Downey (29 projects): Project data provided by the City;
- Other jurisdictions (12 projects): City of Paramount and City of South Gate environmental documents for projects in the respective jurisdictions, which was the most comprehensive published information available, as of this writing.

The geographic areas, and hence the cumulative projects, considered for the cumulative impact analyses vary according to environmental issue area and were determined based upon the Project's scope and the anticipated area in which the Project could contribute to an incremental increase in cumulatively considerable impacts (as discussed in Section 4.1 through Section 4.15). Implementation of each related

project identified in **Table 3-1** was determined to be reasonably foreseeable by the City of Downey. In addition, the cumulative projects could result in a similar range of impacts as the proposed Project, because most represent infill development projects within urbanized areas.

Table 3-1: Cumulative Projects

No.	Name	Location	Dwelling Units	Building Area (Square Feet)	Status
City of Downey					
1	West Santa Ana Branch Transit Corridor	Rancho Los Amigos South Campus	-	-	Environmental Review
2	Rancho Los Amigos National Rehabilitation Center Consolidation Project	Rancho Los Amigos North Campus	-	178,000	Under Construction
3	Downey Recuperative Care Center	Rancho Los Amigos North Campus	-	78,000	Under Construction
4	Downey Sports Center	Rancho Los Amigos South Campus	-	3,500	Under Construction
5	Rancho Los Amigos South Campus	Rancho Los Amigos South Campus	-	650,000	EIR Certified
6	Burlington Coat Factory	8955 Apollo Way	-	34,000	Complete
7	The Promenade	9080 Apollo Way	-	21,000	Complete
8	Fontana Townhomes	8435 Fontana Street	-	-	Withdrawn
9	Olson Downtown Housing	8150 3rd Street	28	-	Complete
10	8117 Second Street Apartments	8117 2nd Street	50	-	Complete
11	8028 Third Street Medical Office Building	8028 3rd Street	-	3,750	Complete
12	Kaiser Permanente Downey Medical Center	9343 Imperial Highway	-	141,364	Complete
13	Downey Medical Office	9041 Imperial Highway	-	12,000	Complete
14	Stewart and Grey Condos	8104 Stewart Road	7	-	Under Construction
15	Marriott Springhill Suites	9066 Firestone Boulevard	-	88,850	Under Construction
16	Centerpointe	10720 Paramount Boulevard	117	-	Complete
17	Avenue Theater	11022 Downey Avenue	-	-	Under Construction
18	28-Unit Residential	12850 Woodruff Avenue	28	-	Planning Review
19	Western Avenue Townhome	10345 Western Avenue	8	-	Under Construction
20	Habitat for Humanity	9303 Elm Vista	6	-	Complete
21	Downey Oasis	9553 Firestone Boulevard	24	-	Complete
22	12120 Woodruff Avenue Industrial	12120 Woodruff Avenue	-	20,000	Permits Issued
23	Starbucks	7966 Florence Avenue	-	1,785	Complete
24	47-Unit Residential	10361 Foster Road	-	47	Planning Review
25	Warehouse Building	9350 Hall Road	-	544,110	Planning Review
26	Commercial Development	7201 Firestone Boulevard	-	60,000	Planning Review

Table 3-1: Cumulative Projects

No.	Name	Location	Dwelling Units	Building Area (Square Feet)	Status
27	Starbucks	9002 Firestone Boulevard	-	1,698	Building Plan Check
28	Medical Office Building	9432 Telegraph Road	-	7,800	Building Plan Check
29	Warehouse/Truck Terminal	12021 Woodruff Avenue	-	43,905	Building Plan Check
City of Paramount					
24	15015-15029 Indiana Avenue Residential	15015-15029 Indiana Avenue	8	-	Under Construction
25	Drs. Henein and Kamel	15158-15302 Orange Avenue	11	-	Complete
26	Echemendia	15301-15309 Gundry Avenue	4	-	Complete
27	Gold Key Development	7203-7215 Somerset Boulevard	12	-	Complete
28	8009 Alondra Boulevard Restaurant	8009 Alondra Boulevard	-	5,799	Complete
29	7755 Madison Street Industrial	7755 Madison Street	-	7,200	Complete
30	7518 Somerset Boulevard Industrial	7518 Somerset Boulevard	-	7,049	Under Construction
City of South Gate					
31	Jefferson on Imperial	10920 Garfield Avenue	244	-	Complete
32	PATH Villas at South Gate	5610 Imperial Highway	60	-	Complete
33	Gateway Plaza	13700 Paramount Avenue	48	10,000	Environmental Review
34	South Gate Plaza	9923 Atlantic Avenue	91	85,547	Environmental Review
35	AltaMed Medical Center	8627 Atlantic Avenue	-	28,961	Environmental Review
		Total	**1,049**	**2,034,365**	

4.0 ENVIRONMENTAL ANALYSIS

The EIR sections outlined below contain a detailed environmental analysis of the existing/baseline conditions, Project impacts, recommended mitigation measures, and unavoidable significant impacts. **Sections 4.1** through **4.15** analyze those environmental resource areas where potentially significant impacts could occur, as stated in **Appendix A: Notice of Preparation and Comments Received**.

This EIR examines environmental issues outlined in State CEQA Guidelines Appendix G*, Environmental Checklist Form*, as follows:

- 4.1: Aesthetics
- 4.2: Air Quality
- 4.3: Biological Resources
- 4.4: Cultural Resources
- 4.5: Energy
- 4.6: Greenhouse Gas Emissions
- 4.7: Hazards and Hazardous Materials
- 4.8: Hydrology and Water Quality
- 4.9: Land Use and Planning
- 4.10: Noise
- 4.11: Population and Housing
- 4.12: Public Services and Recreation
- 4.13: Transportation
- 4.14: Tribal Cultural Resources
- 4.15: Utilities and Service Systems

Based on the Notice of Preparation (refer to **Appendix A**) and existing conditions within the Specific Plan area and surrounding area, no impacts associated with the following environmental issue areas would occur and are therefore not evaluated in this PEIR:

- Agriculture and Forestry Resources
- Geology and Soils
- Mineral Resources
- Wildfires

Therefore, these issue areas are addressed in **Section 7.0: Effects Found Not to be Significant**.

Each potentially significant environmental issue area is addressed in a separate EIR section (4.1 through 4.15) and is organized into the following subsections:

- Introduction
- Affected Environment
- Regulatory Framework
- Significance Criteria and Thresholds
- Impacts and Mitigation Measures
- Cumulative Impacts
- Significant Unavoidable Impacts
- References

Introduction discusses the section's intent and purpose, identifies the primary sources of data used in the analysis, and summarizes the issues raised during the public scoping period.

Affected Environments describes the physical conditions that exist at the time the Notice of Preparation was released, and that may influence or affect the issue under investigation.

Regulatory Setting lists and discusses the laws, ordinances, regulations, and standards applicable to the Project.

Significance Criteria and Thresholds provides the thresholds that are the basis of conclusions of significance, which are primarily the criteria in State CEQA Guidelines Appendix G (California Code of Regulations, §§15000 – 15387).

The primary sources used in identifying the criteria include the State CEQA Guidelines; local, state, federal, or other standards applicable to an impact category; and officially established significance thresholds. "…An ironclad definition of significant effect is not possible because the significance of any activity may vary with the setting" (State CEQA Guidelines §15064[b]). Principally, "…a substantial, or potentially substantial, adverse change in any of the physical conditions within an area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance" constitutes a significant impact (State CEQA Guidelines §15382).

Impacts and Mitigation Measures. Concerning impacts, this section describes potential environmental changes to the existing physical conditions that may occur if the Project is implemented. Evidence, based on factual and scientific data, is presented to show the cause and effect relationship between the Project and the potential environmental changes. The exact magnitude, duration, extent, frequency, range, or other parameters of a potential impact are ascertained, to the extent possible, to determine whether impacts may be significant; all of the potential direct and reasonably foreseeable indirect effects are considered.

Impacts analyzed under CEQA must be related to a physical change. Impacts are:

- Direct or primary impacts that would be caused by a proposed project and would occur at the same time and place; or
- Indirect or secondary impacts that would be caused by a proposed project and would be later in time or farther removed in distance but would still be reasonably foreseeable. Indirect or secondary impacts may include growth-inducing impacts and other effects related to induced changes in the pattern of land use; population density or growth rate; and related effects on air and water and other natural systems.
- The California Supreme Court ruled that the environment's impact on a project fall outside the scope of CEQA except to the extent that impacts from a project exacerbate such impacts. This PEIR includes the environment's impacts on a project for informational purposes, and to address the exacerbation component of the Court's decision.

"Significant impact on the environment" means a substantial, or potentially substantial, adverse change in any of the physical conditions in the area affected by a proposed project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. An economic or social change by itself is not considered a significant impact on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

"Cumulative Impacts" are two or more individual impacts that, when considered together, are considerable or that compound or increase other environmental impacts. Cumulative impacts may also occur as a result of the Project together with all other reasonably foreseeable, planned, and approved future projects producing related or cumulative impacts. The following statements also apply when considering cumulative impacts:

- The individual impacts may be changes resulting from a single project or separate projects.
- The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over time.

This PEIR uses terms in accordance with CEQA to describe the level of significance of adverse impacts. These terms are defined as follows:

- ***No Impact.*** The proposed Project would not have any measurable impact on the environment.
- ***Less than Significant Impact.*** An impact that is adverse but that does not exceed the defined thresholds of significance. Less than significant impacts do not require mitigation.
- ***Less than Significant with Mitigation Incorporated.*** An impact that exceeds the defined thresholds of significance and would or could cause a substantial adverse change in the environment. Standard Conditions and Requirements, and Mitigation Measures are recommended to prevent the impact, eliminate the impact, or reduce it to a level that is considered less than significant.
- ***Significant and Unavoidable***. An impact that exceeds the defined thresholds of significance and cannot be eliminated or reduced to a less than significant level through the implementation of the Mitigation Program.

  To approve a project with unavoidable significant impacts, the lead agency must adopt a Statement of Overriding Considerations. In adopting such a statement, the lead agency is required to balance the benefits of a project against its unavoidable environmental impacts in determining whether to approve the project. If a project's benefits are found to outweigh the unavoidable adverse environmental effects, the adverse effects may be considered "acceptable" (State CEQA Guidelines §15093(a)).

Concerning mitigation measures, this section describes measures that would be required of the Project to avoid a significant adverse impact; to minimize a significant adverse impact; to rectify a significant adverse impact by restoration; to reduce or eliminate a significant adverse impact over time by preservation and maintenance operations; or to compensate for the impact by replacing or providing substitute resources or environment.

The PEIR includes a Mitigation Program to avoid or substantially reduce the Project's significant environmental impacts by:

- Avoiding the impact altogether by not taking a certain action or parts of an action;
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation;
- Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or
- Compensating for the impact by replacing or providing substitute resources or environments.

The Mitigation Program includes Standard Conditions and Requirements (SCs) and Mitigation Measures (MMs). The components of the Mitigation Program are described below.

- ***Standard Conditions and Requirements.*** Existing requirements and standard conditions are based on local, State, or federal regulations or laws that are frequently required independently of CEQA review and serve to offset or prevent specific impacts. Typical SCs include compliance with the provisions of the *California Building Code*, South Coast Air Quality Management District rules, local agency requirements, and other regulations and standards. The City may impose additional conditions including those that are standard to all projects, typical to a project of a particular nature, or specific to the Project during the approval process, as appropriate.
- ***Mitigation Measures.*** Where a potentially significant environmental effect has been identified and is not reduced to a level considered less than significant through the application of SCs, mitigation measures are recommended.

Modifications to the Mitigation Program may be made by the City subject to one of the following findings, documented by evidence included in the administrative record:

- The SC or MM included in the Final EIR and MMRP is no longer required because the significant environmental impact identified in the Final EIR has been found not to exist, or to occur at a level which makes the impact less than significant as a result of changes in the Project, changes in conditions of the environment, or other factors; or
- The modified or substitute SC or MM to be included in the MMRP provides a level of environmental protection equal to, or greater than that afforded by the SC or MM included in the Final EIR and the MMRP; or
- The modified or substitute SC or MM does not have significant adverse effects on the environment in addition to, or greater than that which was considered by the responsible hearing bodies in their decisions on the Final EIR and the Project; and
- The modified or substitute SC or MM is feasible, and the City, through measures included in the MMRP or other City procedures, can ensure its implementation.

The City of Downey, in conjunction with any appropriate agencies or City departments, shall determine the adequacy of any proposed "environmental equivalent/timing" and, if determined necessary, may refer said determination to the Planning Commission. Findings and related documentation supporting the findings involving modifications to any SC and/or MM shall be maintained in the Project file with the MMRP and shall be made available to the public upon request.

To assist reviewers in understanding this PEIR, the following terms are defined. The **Table of Contents** includes a list of acronyms used in the PEIR.

Project means the whole of an action that has the potential for resulting in a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.

Environment means the physical conditions that exist in the area and which would be affected by a project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. The area involved is where significant direct or indirect impacts would occur as a result of the project. The environment includes both natural and man-made (artificial) conditions.

4.1 AESTHETICS

4.1.1 INTRODUCTION

This section describes the aesthetic and other visual resources present on the Project site (referred herein as the Focus Area) and its surroundings and evaluates whether the proposed Project would adversely impact such resources. Aesthetic and other visual resources include both the natural and built-up environments. The data presented in this section was obtained from available public resources including the Downey General Plan (DGP), Downey Municipal Plan (DMC), and Draft Rancho Los Amigos South Campus Specific Plan (RLASCSP or Specific Plan).

VISUAL RESOURCE TERMINOLOGY AND CONCEPTS

When viewing the same landscape, people may have different responses to that landscape and any proposed visual changes, based upon their values, familiarity, concern, or expectations for that landscape and its scenic quality. Since each person's attachment to and value for a particular landscape is unique, visual changes to that landscape inherently affect viewers differently. However, generalizations can be made about viewer sensitivity to scenic quality and visual changes. Recreational users (e.g., hikers, equestrians, tourists, and people driving for pleasure) are expected to have high concern for scenery and landscape character. People who are commuting daily through the same landscape generally have a moderate concern for scenery, while people working at industrial sites generally have a lower concern for scenic quality or changes to existing landscape character. The visual sensitivity of a landscape is affected by the viewing distances at which it is seen, such as close-up or far away. The visual sensitivity of a landscape also is affected by the travel speed at which a person is viewing the landscape (high speeds on a highway, low speeds on a hiking trail, or stationary at a residence).

The same feature of a project can be perceived differently by people depending on the distance between the observer and the viewed object. When a viewer is closer to a viewed object in the landscape, more detail can be seen, and there is greater potential influence of the object on visual quality because of its form or scale (relative size of the object in relation to the viewer). When the same object is viewed at background distances, details may be imperceptible but overall forms of terrain and vegetation are evident, and the horizon and skyline are dominant. In the middle-ground, some detail is evident (e.g., the foreground), and landscape elements are seen in context with landforms and vegetation patterns (e.g., the background).

The following terms and concepts are in this PEIR section:

- **Scenic vista.** An area that is designated, signed, and accessible to the public for the express purposes of viewing and sightseeing. This includes any such areas designated by a federal, state, or local agency.
- **Scenic highway.** Any stretch of public roadway that is designated as a scenic corridor by a federal, state, or local agency.
- **Sensitive receptors**. Viewer responses to visual settings are inferred from a variety of factors, including distance, viewing angle, types of viewers, number of viewers, duration of view, and viewer activities. The viewer type and associated viewer sensitivity are distinguished among

project viewers in recreational, residential, commercial, military, and industrial areas. Viewer activities can range from a circumstance that encourages a viewer to observe the surroundings more closely (such as recreational activities) to one that discourages close observation (such as commuting in heavy traffic). Viewers in recreational areas are considered to have high sensitivity to visual resources. Residential viewers generally have moderate sensitivity but extended viewing periods. Viewers in commercial, military, and industrial areas are considered to have low sensitivity.

- **Viewshed**. The viewshed for a project is defined as the surrounding geographic area from which the project is likely to be seen, based on topography, atmospheric conditions, land use patterns, and roadway orientations. "Project viewshed" is used to describe the area surrounding a project site where a person standing on the ground or driving a vehicle can view the project site.
- **Visual character** typically consists of the landforms, vegetation, water features, and cultural modifications that impart an overall visual impression of an area's landscape. Scenic areas typically include open space, landscaped corridors, and viewsheds. Visual character is influenced by many different landscape attributes including color contrasts, landform prominence, repetition of geometric forms, and uniqueness of textures among other characteristics.
- **Light and Glare.** Lighting effects are associated with the use of artificial light during the evening and nighttime hours. There are two primary sources of light: light emanating from building interiors passing through windows and light from exterior sources (i.e., street lighting, building illumination, security lighting, parking lot lighting, landscape lighting, and signage). Light introduction can be a nuisance. Uses such as residences and hotels are considered light-sensitive, since occupants have expectations of privacy during evening hours and may be subject to disturbance by bright light sources. Light spill is typically defined as the presence of unwanted light on properties adjacent to the property being illuminated. With respect to lighting, the degree of illumination may vary widely depending on the amount of light generated, height of the light source, presence of barriers or obstructions, type of light source, and weather conditions.

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light on highly polished surfaces such as window glass or reflective materials and, to a lesser degree, from broad expanses of light-colored surfaces. Perceived glare is the unwanted and potentially objectionable sensation as observed by a person as they look directly into the light source of a luminaire. Daytime glare generation is common in urban areas and is typically associated with buildings with exterior facades largely or entirely comprised of highly reflective glass. Glare can also be produced during evening and nighttime hours by the reflection of artificial light sources such as automobile headlights. Glare generation is typically related to either moving vehicles or sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the year. Glare-sensitive uses include residences, hotels, transportation corridors, and aircraft landing corridors.

4.1.2 AFFECTED ENVIRONMENT

The City of Downey (City) is located in a relatively flat area of the greater southeast Los Angeles area, and is bordered by existing development in the cities of South Gate, Commerce, Pico Rivera, Santa Fe Springs, Norwalk, Bellflower, Paramount, and Bell Gardens. The San Gabriel Mountains are located approximately

20 miles to the north and the City of Long Beach and the Pacific Ocean are approximately 12 miles to the south. Because the City and the surrounding communities are dense urban environments with very little topographic variation, there are very limited opportunities for any elevated or expansive views. With no distinguishable topography, there are no identifiable scenic vistas in the City, except those that may be afforded by two golf courses to the west side.

Other features that contribute to the visual and aesthetic character of the City include public parks and open space, the density and distribution of existing development, architecture, its history of orange orchards, and resources associated with the City's role within the aerospace industry. Currently, the City is home to the Rancho Los Amigos National Rehabilitation Center, located north of the Specific Plan area. The Rancho Los Amigos National Rehabilitation Center is one of the largest comprehensive medical rehabilitation centers in the United States providing services to a wide range of individuals with catastrophic illnesses and injuries.

SCENIC VISTAS

The DGP does not identify any scenic vistas within the City.

SCENIC HIGHWAY

There are no state designated scenic highways in the City.

VISUAL CHARACTER

The northern portion of the 172-acre RLASCSP area primarily consists of active industrial warehouses and technology and medical companies. The southern portion, including the Focus Area, is comprised of primarily aging institutional buildings (mostly vacant). Overgrown trees and bushes are situated throughout the Specific Plan area, inclusive of the Focus Area. Additional uses throughout the Specific Plan area include surface parking and roadways, limited active civic and commercial buildings, a small area of open space, and the Union Pacific Railroad (UPRR) Corridor. Of the 172-acre Specific Plan area, approximately 109 acres would remain unchanged or is committed to other projects being planned and studied by County of Los Angeles (County) and Los Angeles Metropolitan Transportation Authority (Metro). These concurrent projects have not yet changed the visual character within the Specific Plan area, but will do so to varying degrees upon implementation.

Generally, the visual character of the Focus Area is dominated by a range of institutional buildings that date from 1888 through the 1930s. The Historic District Evaluation Report prepared for the County's Rancho Los Amigos South Campus Project EIR (County Project EIR) (see County Project EIR Appendix D-1) describes the historical significance and characteristics of the Rancho Los Amigos Historic District (Historic District), which is inclusive of the Focus Area. The analysis in the County Project EIR included a portion of the Focus Area and is representative of general site conditions and sensitivity throughout the South Campus. The notable architectural styles define the visual character of the Historic District and multiple buildings represent the functions under which they were registered as historically significant. The architectural styles include the Craftsman Architecture (1905 to 1930), Neoclassical Revival Architecture (1885-1930), Renaissance Revival and Brick Vernacular (1895 to 1935), and Spanish Colonial Revival (1915-1940).

Buildings, structures, and features within the Focus Area are depicted on **Exhibit 2-4** in **Section 2: Project Description** of this PEIR. They include individually-eligible historic structures: Administration Building/ Office of Public Safety (LACO No. 1100; Exhibit 2-4, No. 8); the grouping of the Power Plant (LACO No. 1300; Exhibit 2-4, No. 5), Water Tower (LACO No. 1301; Exhibit 2-4, No. 5), the Shop, Laundry and Ice Plant complex (LACO No. 1302; Exhibit 2-4; No. 5), and the Moreton Bay Fig Tree (Exhibit 2-4, south of No. 5). These buildings and structures represent distinctive examples of architecture, and are visually dominant on the Focus Area. These resources would be retained as a part of the Project.

Additional buildings within the Focus area contain architectural elements that contribute to the Focus Area's historic character. Existing structures such as the restored Administrative Building/Office of Public Safety Building represent early Los Angeles Art Deco and Spanish colonial design. However, a majority of existing buildings are fenced with chain link and barbed wire for safety and security purposes. Additionally, some buildings have been damaged by fires of suspicious origin and vandalism has resulted in boarding up of windows. Existing site conditions are provided in Section 3.1 of the County Project EIR.

Interspersed among the buildings are landscaped areas, courtyards, and other open spaces, and numerous trees, which are characteristic of the park-like South Campus. Courtyards are both internal to existing building groups and along the primary circulation networks throughout the Focus Area, namely along Consuelo Street and around the Administrative Building/Office of Public Safety.

Limited views of the Focus Area are provided from surrounding public thoroughfares and business park uses in the northern portion of the Specific Plan area. Due to existing fencing and safety features, aesthetic value of existing structures is limited.

LIGHT AND GLARE

Light and glare in the Specific Plan area is typical of that found in urban environments with active businesses. Sources of light and glare include adjacent public, residential, commercial, and industrial land uses. Stationary source lighting in the area is generated from building interiors and exterior sources (i.e., building illumination, security lighting, parking lot lighting, and landscape lighting) associated with existing land uses. The area is also influenced by light and glare from vehicle headlights, streetlights, and signage at existing structures. As discussed above, the Focus Area primarily contains vacant buildings with boarded up windows that do not contribute to light and glare. Active uses include the County Public Works Facility and the County Animal Shelter located in the southwestern portion of the Focus Area. These uses are outside of the Historic District and surrounded by active urban uses which contribute to light and glare in the surrounding area.

4.1.3 REGULATORY SETTING

STATE

California State Scenic Highways (Streets and Highways Code §§260 to 263)

The California Department of Transportation (Caltrans) manages the California Scenic Highway Program, which is intended to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to highways. State laws governing the Scenic Highway Program are found in Streets and Highways Code §§260 to 263. A highway may be designated as scenic based on certain criteria, including how much of the natural landscape can be seen by travelers, the landscape's scenic

quality, and the extent to which development intrudes on the traveler's scenic view enjoyment. The Program's Scenic Highway System List identifies scenic highways that are either eligible for designation or have already been designated as such.

REGIONAL AND LOCAL

City of Downey Vision 2025 General Plan

The City of Downey Vision 2025 General Plan (DGP) was adopted on January 25, 2005. The DGP provides a long-range policy guide to address changes to the City. Two specific chapters provide policies and regulations related to the topic of aesthetics:

Open Space Element

Chapter 7, Open Space, provides guidance on preserving and providing open space areas for the City. The following goals and policies are applicable to the Project and potential aesthetic impacts:

- **Goal 7.3:** Increase the amount of park acreage.
    - **Policy 7.3.1:** Promote the expansion of the existing park system.

Design Element

Chapter 8, Design, provides guidance on the visual appearance of the City. The following goals and policies are applicable to the Project and potential aesthetic impacts:

- **Goal 8.1:** Promote quality design for new, expanded, and remodeled construction.
    - **Policy 8.1.1:** Promote architectural design of the highest quality.
- **Goal 8.3:** Promote the enhancement of the streetscape.
    - **Policy 8.3.1:** Enhance the views of property from public streets to exhibit a positive image.
    - **Policy 8.3.3:** Promote the installation of new trees.
- **Goal 8.4:** Enhance Downey's cultural resources.
    - **Policy 8.4.2:** Preserve the city's cultural resources.

City of Downey Municipal Code §8950

DMC §8950, also known as the City of Downey's Art in Public Places Program, aims to provide a collection of permanent artwork and access to facilities where public art is displayed. The Art in Public Places Program is designed to present the community with a wide range of artwork styles, themes and media, all of the highest quality. All pieces must be of monumental scale in proportion to the size of the buildings. Balance and variety are qualities to strive for as the program grows.

The Art in Public Places Policy Manual was adopted by Resolution No. 05-6882 on November 22, 2005 and has been amended through 2012. The manual describes the program policies, guidelines and application process.

City of Downey Municipal Code §9322.02

Pertaining to the Open Space Zone, this ordinance is intended to prevent "incompatible development in areas that should be preserved or regulated for scenic, recreational, conservation, aesthetic, or health and safety purposes."

City of Downey Municipal Code §9520

DMC §9520 establishes landscaping, lighting, and walls regulations that are intended to create an atmosphere of orderly development and uniformly pleasant and attractive surroundings in the City to enhance, conserve, and stabilize property values. Further, the section aims to reduce the amount of heat, noise, and glare generated by development; and minimize the impact of all forms of physical and visual pollution; screening incompatible uses; preserving and enhancing the visual appearance of the City; and enhancing pedestrian, bicycle, and vehicular traffic safety.

City of Downey Municipal Code §9624

DMC §9624 outlines lighting and design standards for signage to prevent glare onto abutting properties or the public rights-of-way.

4.1.4 SIGNIFICANCE CRITERIA AND THRESHOLDS

The following significance criteria are from Appendix G of the State CEQA Guidelines. Project implementation would result in a significant impact if it would:

- Have a substantial adverse effect on a scenic vista (see Impact 4.1-1);
- Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway (see Impact 4.1-2);
- 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, impacts may be significant if the Project conflicts with applicable zoning and other regulations governing scenic quality (see Impact 4.1-3); and/or
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area (see Impact 4.1-4).

METHODOLOGY AND ASSUMPTIONS

The proposed Project and associated RLASCSC Design Guidelines were evaluated against the aforementioned significance criteria/thresholds, as the basis for determining the impact's level of significance concerning aesthetics. In addition to the design characteristics of future development, this analysis considers the existing regulatory framework (i.e., laws, ordinances, regulations, and standards) that avoid or reduce the potentially significant environmental impact. Where significant impacts remain despite compliance with the regulatory framework, feasible mitigation measures are recommended, to avoid or reduce the Project's potentially significant environmental impacts.

This analysis of impacts on aesthetic resources examines the Project's temporary (i.e., construction) and permanent (i.e., operational) effects-based significance criteria/threshold's application. For each criterion, the analyses address both construction and operational impacts, as applicable. Each criterion is

discussed in the context of Project components that share similar characteristics/geography. The impact conclusions consider the potential for changes in environmental conditions, as well as compliance with the regulatory framework enacted to protect the environment.

The baseline conditions and impact analyses are based on field observations conducted by Kimley-Horn, RLASCSP design guidelines and development standards, aerial surveys, historic imagery review, and review of various data available in public records. The determination that a Project component would or would not result in "substantial" adverse or beneficial effects on scenic resources or visual character considers the site's aesthetic resource value and the Project's individual component's visual impact (e.g., the nature and duration of the impact). For example, a Project component resulting in a substantial change on a site with a low aesthetic resource value could result in a less than significant impact concerning scenic or visual character. In other words, new conspicuous structures or visual changes in areas with a low aesthetic resource value may not necessarily result in substantial adverse effects on visual resources and could result in a beneficial effect.

Visual sensitivity can be described as viewer awareness of visual changes in the environment and is based on the viewers' perspective while engaging in activities from public areas near a project site. The project site is visible to various users, primarily from local roadways and businesses. The sensitivity of those users to changes within a project site varies with the type of use, length of time that the viewer would be within a project site's zone of visual influence, and the viewer's distance from a project site. Viewers of a project site typically include nearby residents, and recreational users, travelers, and commuters.

4.1.5 IMPACTS AND MITIGATION

Impact 4.1-1: Would the project have a substantial adverse effect on a scenic vista?

No Impact. There are no scenic vistas identified within the DGP and no areas of expansive views or vistas to or from the Specific Plan area, inclusive of the Focus Area due to the City's flat topography. The proposed Project would not result in direct construction of residential or non-residential uses, but would facilitate and provide a policy framework for future development within the Focus Area. Future projects would be subject to development review process and zoning requirements which would consider integration with the surrounding environment. Therefore, the Project would have no impact on a scenic vista. No mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.1-2: 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. There are no state designated scenic highways within the City. According to the Scenic Highway System List, a segment of Interstate 5 is eligible; however, this segment is located in northern Los Angeles County and not yet officially designated.[1] As previously noted, the Project would not result in direct construction but would facilitate future development within the Focus Area. All future projects would

[1] California Department of Transportation. (2018). *Scenic Highway System List*. Retrieved from http://www.dot.ca.gov/design/lap/livability/scenic highways/index.html.

be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including those intended to protect scenic resources. Therefore, project implementation would not substantially damage scenic resources within a State Scenic Highway. No impact would occur. No mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.1-3: 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 with Mitigation. The Focus Area includes visible remnants of the prior historic uses such as the County Poor Farm and medical facilities, and includes mature trees, buildings and roadways. The Rancho Los Amigos Historic District includes the buildings, structures, and landscape features that represent the evolution of the property from the agricultural-based Poor Farm to a rehabilitative institution, and ultimately into a medical hospital for the mentally and physically infirm. These features comprise a landscape that includes several architectural styles constructed over the decades of the site's operation, but which are now in structural disrepair. While the poor condition of the structures and landscape detract from the visual quality of these resources, the features contribute the character of the area and help define the history of the site.

As previously noted, the Project would not result in direct construction, but would facilitate future development within the Focus Area. Future development within the Focus Area would alter the existing character of the Focus Area through the removal of the majority of existing structures. Future development would be required to comply with the RLASCSP Plan Design Guidelines which ensure thoughtful, high-quality, and cohesive design. The RLASCSP aims to, "Create a cohesive and vibrant mixed-use district that blends the diverse collection of uses anticipated for the Specific Plan area." Redevelopment of the site would have beneficial impacts by removing blighted structures and associated security fencing, and allowing economic development that can be used for selective preservation efforts (see **Section 4.3: Cultural Resources** for a discussion of historic preservation). However, while future development would not degrade the existing visual quality of the site, it would affect and change the remaining visual landscape of the Historic District and Focus Area from local roadways.

As discussed above and in Section 4.3 of this PEIR, the Historic American Buildings Survey prepared by the National Park Service (HABS CA-2800) identified a number of remaining structures that were identified as "significant" in a 2004 survey and "contributing" to the historic district in the 2007-2008 survey. Removal of these structures would result in potential impacts to visual character of the site. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including those intended to protect visual character. Additionally, projects would be required to implement **MM CR-3 and CR-5** concerning historic structures (see **Section 4.3: Cultural Resources**). Accordingly, a less than significant impact would occur concerning visual character following compliance with the established regulatory framework and implementation of **MM CR-3** and **MM CR-5**.

Mitigation Measures

MM CR-3 and CR-5; see **Section 4.3: Cultural Resources.**

Impact 4.1-4: Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Less than Significant. Project implementation would facilitate development of transit-oriented mixed-uses within the Focus Area. Future development within the Focus Area would introduce new sources of nighttime lighting and potential glare and glint from reflective surfaces. These effects and sources of lighting are consistent with surrounding developed areas and typical of the local urban environment. Future development would be subject to the development review process and required to demonstrate consistency with applicable policies and requirements. Lighting design would be governed by the RLASCSP Design Guidelines and DMC §9520 and §9624, which are intended to control new sources of exterior lighting and to avoid nuisance effects. Following compliance with the established regulatory framework, the Project would have a less than significant impact concerning light or glare. No mitigation is required.

Mitigation Measures

No mitigation is required.

4.1.6 CUMULATIVE IMPACTS

When evaluating cumulative aesthetic impacts, several factors must be considered. The cumulative study area for aesthetic impacts is the viewshed that includes the Focus Area and its surrounding areas. The combination of the proposed Project together with related present and reasonably foreseeable future projects, as provided in **Table 3-1: Cumulative Projects List**, could involve actions with the potential to result in adverse aesthetic impacts. As previously stated, the Project does not propose development but would facilitate future development with a maximum buildout capacity of 700 dwelling units (DUs) and 1,130,000 square feet (SF) of non-residential land uses within the Focus Area.

The context in which a project is being viewed will influence the significance of the aesthetic impact. The contrast a project has with its surrounding environment may be reduced by the presence of other cumulative projects. If most of an area is or is becoming more urbanized, the contrast of a project with the natural surrounding may be less since it would not stand out in contrast as much. In order for a cumulative aesthetic impact to occur, the proposed elements of the cumulative projects would need to be seen together or in proximity to each other. If the projects were not near each other, the viewer would not perceive them in the same scene.

Potential impacts of future development within the Focus Area would require project-level evaluation prior to approval of permits when future development is proposed. Each development in the Focus Area would be required to comply with policies and regulations set out by the proposed Specific Plan's Design Guidelines and Development Standards, and applicable policies and programs. Compliance with these policies, plans, and regulations would ensure that proposed future development would be compatible. Where significant or potentially significant impacts are identified, implementation of all feasible mitigation will be required to reduce or preclude significant aesthetic impacts. Therefore, the Project's contribution toward cumulative impacts is not otherwise considered to be cumulatively considerable.

With respect to nighttime illumination, nighttime lighting effects may be considered in a regional context because of the potential for night glow that would extend beyond the boundaries of a site. Therefore, with respect to night lighting, the Project is considered in context to the forecasted growth for the area that may contribute to the increased nighttime lighting. Because the City and the Specific Plan area are predominately developed and are bordered by existing development, have existing nighttime lighting, and would comply with applicable design standards and ordinances, the Specific Plan's contribution to nighttime lighting would be less than cumulatively considerable.

4.1.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable aesthetic impacts have been identified.

4.1.8 REFERENCES

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4.2 AIR QUALITY

4.2.1 INTRODUCTION

This section analyzes the potential effects on air quality associated with air emissions generated by the construction and operation of the proposed uses in the Rancho Los Amigos South Campus Specific Plan (RLASCSP)'s Focus Area. The analysis also addresses the consistency of the Project with the air quality policies set forth within the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP) and the City of Downey General Plan Vision 2025 (DGP). The analysis of Project-generated air emissions focuses on whether the Project would cause exceedance of an ambient air quality standard or SCAQMD significance threshold.

As addressed in **Section 1: Introduction**, this PEIR section relies upon and incorporates by reference in its entirety County of Los Angeles Rancho Los Amigos South Campus Project EIR (County Project EIR) Section 3.2, Air Quality, prepared October 2019. The analysis conducted for the County Project EIR is representative of general site conditions and sensitivity throughout the South Campus . The County Project EIR and the detailed studies therein adequately address the air quality, and applicable mitigation strategies.

4.2.2 AFFECTED ENVIRONMENT

REGIONAL CONDITIONS

Air Basin

The Specific Plan area, inclusive of the Focus Area, is located within the South Coast Air Basin (Air Basin). The Air Basin is an approximately 6,745-square-mile area bordered by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Air Basin consists of Orange County, Los Angeles County (excluding the Antelope Valley portion), and the western, non-desert portions of San Bernardino and Riverside counties, in addition to the San Gorgonio Pass area in Riverside County. The terrain and geographical location determine the distinctive climate of the Air Basin, as it is a coastal plain with connecting broad valleys and low hills.

The Air Basin lies in the semi-permanent high-pressure zone of the eastern Pacific Ocean. The usually mild climatological pattern is interrupted by periods of hot weather, winter storms, or Santa Ana winds. The extent and severity of criteria pollutant concentrations in the Air Basin is a function of the area's natural physical characteristics (weather and topography) and man-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and dispersion of pollutants throughout the Air Basin, making it an area of high pollution potential. The Air Basin's meteorological conditions, in combination with regional topography, are particularly conducive to the formation and retention of O_3, which is a secondary pollutant that forms through photochemical reactions in the atmosphere. Thus, the greatest air pollution impacts throughout the Air Basin typically occur from June through September. This condition is generally attributed to the emissions occurring in the Air Basin, light winds, and shallow vertical atmospheric mixing. These factors reduce the potential for pollutant dispersion causing elevated air pollutant levels. Pollutant concentrations in the Air Basin vary with location, season, and time of day. Concentrations of O_3, for

example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Air Basin and adjacent desert.

Air Pollutants of Concern

The air pollutants emitted into the ambient air by stationary and mobile sources are regulated by state and federal laws. These regulated air pollutants are known as "criteria air pollutants" and are categorized into primary and secondary pollutants.

Primary air pollutants are emitted directly from sources. Carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxide (NO_X), sulfur dioxide (SO_2), coarse particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), and lead are primary air pollutants. Of these, CO, NO_X, SO_2, PM_{10}, and $PM_{2.5}$ are criteria pollutants. ROG and NO_X are criteria pollutant precursors and form secondary criteria pollutants through chemical and photochemical reactions in the atmosphere. For example, the criteria pollutant O_3 is formed by a chemical reaction between ROG and NO_X in the presence of sunlight. O_3 and nitrogen dioxide (NO_2) are the principal secondary pollutants. Sources and health effects commonly associated with criteria pollutants are summarized in **Table 4.2 1: Air Contaminants and Associated Public Health Concerns**.

Toxic Air Contaminants

Toxic air contaminants (TACs) are airborne substances that can cause short-term (acute) or long-term (i.e., chronic, carcinogenic or cancer-causing) adverse human health effects (i.e., injury or illness). TACs include both organic and inorganic chemical substances. They may be emitted from a variety of common sources including gasoline stations, automobiles, dry cleaners, industrial operations, and painting operations. The current California list of TACs includes more than 200 compounds, including particulate emissions from diesel-fueled engines.

CARB identified diesel particulate matter (DPM) as a toxic air contaminant. DPM differs from other TACs in that it is not a single substance but rather a complex mixture of hundreds of substances. Diesel exhaust is a complex mixture of particles and gases produced when an engine burns diesel fuel. DPM is a concern because it causes lung cancer; many compounds found in diesel exhaust are carcinogenic. DPM includes the particle-phase constituents in diesel exhaust. The chemical composition and particle sizes of DPM vary between different engine types (heavy-duty, light-duty), engine operating conditions (idle, accelerate, decelerate), fuel formulations (high/low sulfur fuel), and the year of the engine. Some short-term (acute) effects of diesel exhaust include eye, nose, throat, and lung irritation, and diesel exhaust can cause coughs, headaches, light-headedness, and nausea. DPM poses the greatest health risk among the TACs. Almost all diesel exhaust particle mass is 10 microns or less in diameter. Due to their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.

Ambient Air Quality

The SCAQMD maintains a network of air quality monitoring stations located throughout the Air Basin to measure ambient pollutant concentrations. The monitoring station most representative of the Focus Area is the Southeast Los Angeles County Monitoring Station. There is no monitoring data for Southeast Los Angeles County. The next most representative station is the South-Central Los Angeles County monitoring station. Criteria pollutants monitored at this station include CO, O_3, NO_2, $PM_{2.5}$, and lead. The next most representative station is the Central Los Angeles County Monitoring Station. Criteria pollutants monitored at this station include SO_2 and PM_{10}.

Table 2.2-1: Air Contaminants and Associated Public Health Concerns		
Pollutant	**Major Man-Made Sources**	**Human Health Effects**
Particulate Matter (PM_{10} and $PM_{2.5}$)	Power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles and others.	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; asthma; chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility.
Ozone (O_3)	Formed by a chemical reaction between reactive organic gases/volatile organic compounds (ROG or VOC)[1] and nitrogen oxides (NO_X) in the presence of sunlight. Motor vehicle exhaust industrial emissions, gasoline storage and transport, solvents, paints and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield.
Sulfur Dioxide (SO_2)	A colorless gas formed when fuel containing sulfur is burned and when gasoline is extracted from oil. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships.	Respiratory irritant. Aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid which can damage marble, iron and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuel is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO_2)	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include motor vehicles, electric utilities, and other sources that burn fuel.	Respiratory irritant; aggravates lung and heart problems. Precursor to O_3. Contributes to global warming and nutrient overloading which deteriorates water quality. Causes brown discoloration of the atmosphere.
Lead (Pb)	Lead is a metal found naturally in the environment as well as in manufactured products. The major sources of lead emissions have historically been motor vehicles (such as cars and trucks) and industrial sources. Due to the phase out of leaded gasoline, metals processing is the major source of lead emissions to the air today. The highest levels of lead in air are generally found near lead smelters. Other stationary sources are waste incinerators, utilities, and lead-acid battery manufacturers.	Exposure to lead occurs mainly through inhalation of air and ingestion of lead in food, water, soil, or dust. It accumulates in the blood, bones, and soft tissues and can adversely affect the kidneys, liver, nervous system, and other organs. Excessive exposure to lead may cause neurological impairments such as seizures, mental retardation, and behavioral disorders. Even at low doses, lead exposure is associated with damage to the nervous systems of fetuses and young children, resulting in learning deficits and lowered IQ.

[1] Volatile Organic Compounds (VOCs or Reactive Organic Gases [ROG]) are hydrocarbons/organic gases that are formed solely of hydrogen and carbon. There are several subsets of organic gases including ROGs and VOCs. Both ROGs and VOCs are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. The major sources of hydrocarbons are combustion engine exhaust, oil refineries, and oil-fueled power plants; other common sources are petroleum fuels, solvents, dry cleaning solutions, and paint (via evaporation).

Source: California Air Pollution Control Officers Association (CAPCOA), Health Effects, Accessed May 18, 2021.

Existing Site Emissions

The Specific Plan area currently includes a mix of newer and aging industrial and institutional structures traversed by a defined roadway network in an urban setting. Active commercial manufacturing uses occupy the northern portion of the Specific Plan area, while the southern portion, the Focus Area, is in a generally neglected state with deteriorating structures and unmaintained parcels. The Focus Area is a blighted area, with mature ornamental landscaping (trees and shrubs), weedy vegetation, and some historically significant structures identified as contributors to the recognized Rancho Los Amigos Historic District (Historic District). The Focus Area consists entirely of institutional land uses, with approximately 286,842 square feet (SF) of existing buildings. Approximately 193,900 SF of existing buildings are vacant while 93,900 SF are occupied.

Sensitive Receptors and Locations

Certain population groups, such as children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to the potential effects of air pollution than others. Sensitive land uses in close proximity to the Focus Area include the following:

- Single-family residences are located along the southeast border of the Focus Area on the south side of Gardendale Street
- The St. Pius X-St. Matthias Academy is located approximately 30 feet south of the Focus Area, northwest of the intersection of Gardendale Street at Paramount Boulevard.
- The Rancho Los Amigos KinderCare is located approximately 195 feet north of the Focus Area south of Golondrinas Street.
- Single-family residences are located approximately 315 feet southwest of the Focus Area west of Dakota Avenue.
- Single-family residences are located approximately 440 feet north of the Focus Area north of Flores Street.

4.2.3 REGULATORY SETTING

Statutes, regulations, plans, and policies have been adopted that address air quality issues. The Project is subject to air quality regulations developed and implemented at the federal, state, and local levels. This section provides a summary of the pertinent air quality regulatory framework affecting the Project at the federal, state, and local levels.

FEDERAL

Clean Air Act

The federal Clean Air Act of 1963 was the first federal legislation regarding air pollution control and has been amended numerous times in subsequent years, with the most recent amendments occurring in 1990. At the federal level, the USEPA is responsible for implementation of certain portions of the Clean Air Act including mobile source requirements. Other portions of the Clean Air Act, such as stationary source requirements, are implemented by state and local agencies.

The Clean Air Act establishes federal air quality standards, known as National Ambient Air Quality Standards (NAAQS) and specifies future dates for achieving compliance. The Clean Air Act also mandates that the state submit and implement a State Implementation Plan (SIP) for areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met. The 1990 amendments to the Clean Air Act identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones.

In addition to criteria pollutants, Title I also include air toxics provisions which require the USEPA to develop and enforce regulations to protect the public from exposure to airborne contaminants that are known to be hazardous to human health. In accordance with Section 112, the USEPA establishes National Emission Standards for Hazardous Air Pollutants (NESHAPs). The list of hazardous air pollutants (HAPs), or air toxics, includes specific compounds that are known or suspected to cause cancer or other serious health effects.

Title II requirements pertain to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline, automobile pollution control devices, and vapor recovery nozzles on gas pumps are a few of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles which have strengthened in recent years to improve air quality. For example, the standards for NO_X emissions have been lowered substantially, and the specification requirements for cleaner burning gasoline are more stringent.

The Focus Area is located within the South Coast Air Basin, which is an area designated as non-attainment because it does not currently meet NAAQS for certain pollutants regulated under the Clean Air Act. The Air Basin does not meet the NAAQS for O_3 and $PM_{2.5}$ and is classified as being in non-attainment for these pollutants. The Los Angeles County portion of the Air Basin is designated as non-attainment for the lead NAAQS; however, this was due to localized emissions from two previously operating lead-acid battery recycling facilities located in the cities of Vernon and Industry. These facilities are no longer operating and would not affect the Focus Area.

Clean Vehicles

Congress first passed the Corporate Average Fuel Economy law in 1975 to increase the fuel economy of cars and light duty trucks. The law has become more stringent over time. On May 19, 2009, President Obama put in motion a new national policy to increase fuel economy for all new cars and trucks sold in the United States. On April 1, 2010, the EPA and the Department of Transportation's Highway Traffic and Safety Administration (NHTSA) announced a joint final rule establishing a national program that would reduce greenhouse gas emissions and improve fuel economy for new cars and trucks sold in the United States.

Light Duty Vehicle GHG and Fuel Efficiency Standards. In August 2012, the USEPA and USDOT adopted standards for model year 2017 through 2025 for passenger cars and light-duty trucks. By 2020, vehicles are required to achieve a combined standard of 41.7 mpg and 213 grams of CO_2 per mile. By 2025, vehicles are required to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of CO_2 per mile. According to the USEPA, a model year 2025 vehicle would

emit one-half of the GHG emissions from a model year 2010 vehicle.[1] In 2017, the USEPA recommended no change to the GHG standards for light-duty vehicles for model years 2022-2025. On April 2, 2018, the USEPA Administrator signed the Mid-term Evaluation Final Determination that finds that the model year 2022-2025 greenhouse gas standards are not appropriate in light of the record before EPA and, therefore, should be revised. While not a final USEPA action, the Mid-term Evaluation Final Determination initiates a rulemaking process whose outcome will be the final agency action, however until that rulemaking has been completed, the current standards remain in effect.

Heavy-Duty Engines and Vehicles Fuel Efficiency Standards. On October 25, 2010, the EPA and the U.S. Department of Transportation proposed the first national standards to reduce greenhouse gas emissions and improve fuel efficiency of heavy-duty trucks and buses (also known as "Phase 1"). For combination tractors, the agencies proposed engine and vehicle standards that began in the 2014 model year and achieved up to a 20 percent reduction in carbon dioxide emissions and fuel consumption by the 2018 model year. For heavy-duty pickup trucks and vans, the agencies proposed separate gasoline and diesel truck standards, which phased in starting in the 2014 model year and achieved up to a 10 percent reduction for gasoline vehicles and up to a 15 percent reduction for diesel vehicles by 2018 model year (12 percent and 17 percent respectively if accounting for air conditioning leakage). Lastly, for vocational vehicles (includes other vehicles like buses, refuse trucks, concrete mixers; everything except for combination tractors and heavy-duty pickups and vans), the agencies proposed engine and vehicle standards starting in the 2014 model year to achieve up to a ten percent reduction in fuel consumption and carbon dioxide emissions by the 2018 model year. Building on the success of the standards, the EPA and U.S. Department of Transportation jointly finalized additional standards (called "Phase 2") for medium- and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons.

STATE

California Clean Air Act

The California Clean Air Act, signed into law in 1988, requires all areas of the state to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practical date. The CAAQS apply to the same criteria pollutants as the federal Clean Air Act but also include state-identified criteria pollutants, which include sulfates, visibility-reducing particles, hydrogen sulfide, and vinyl chloride. CARB has primary responsibility for ensuring the implementation of the California Clean Air Act, responding to the federal Clean Air Act planning requirements applicable to the state, and regulating emissions from motor vehicles and consumer products within the state. **Table 4.2-2: State and Federal Ambient Air Quality Standards** shows the CAAQS currently in effect for each of the criteria pollutants as well as the other pollutants recognized by the state. As shown in **Table 4.2-2**, the CAAQS include more stringent standards than the NAAQS for most of the criteria air pollutants.

[1] U.S. Environmental Protection Agency (USEPA), EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks, August 2012.

Health and Safety Code §39607(e) requires CARB to establish and periodically review area designation criteria. The Air Basin is designated as attainment for the California standards for sulfates, hydrogen sulfide, and vinyl chloride and unclassified for visibility-reducing particles.

Table 4.2-2: State and Federal Ambient Air Quality Standards

Pollutant	Averaging Time	State Standards[1]	Federal Standards[2]
Ozone (O_3) [2, 5, 7]	8 Hour	0.070 ppm (137 µg/m^3)	0.070 ppm
	1 Hour	0.09 ppm (180 µg/m^3)	NA
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)
	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)
Nitrogen Dioxide (NO_2)	1 Hour	0.18 ppm (339 µg/m^3)	0.10 ppm[11]
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)
Sulfur Dioxide (SO_2) [8]	24 Hour	0.04 ppm (105 µg/m^3)	0.14 ppm (365 µg/m^3)
	1 Hour	0.25 ppm (655 µg/m^3)	0.075 ppm (196 µg/m^3)
	Annual Arithmetic Mean	NA	0.03 ppm (80 µg/m^3)
Particulate Matter (PM_{10}) [1, 3, 6]	24-Hour	50 µg/m^3	150 µg/m^3
	Annual Arithmetic Mean	20 µg/m^3	NA
Fine Particulate Matter ($PM_{2.5}$) [3, 4, 6, 9]	24-Hour	NA	35 µg/m^3
	Annual Arithmetic Mean	12 µg/m^3	12 µg/m^3
Sulfates (SO_{4-2})	24 Hour	25 µg/m^3	NA
Lead (Pb) [10, 11]	30-Day Average	1.5 µg/m^3	NA
	Calendar Quarter	NA	1.5 µg/m^3
	Rolling 3-Month Average	NA	0.15 µg/m^3
Hydrogen Sulfide (H_2S)	1 Hour	0.03 ppm (42 µg/m^3)	NA
Vinyl Chloride (C_2H_3Cl) [10]	24 Hour	0.01 ppm (26 µg/m^3)	NA

ppm = parts per million; µg/m^3 = micrograms per cubic meter; mg/m^3 = milligrams per cubic meter; – = no information available.

[1] California standards for O_3, carbon monoxide (except Lake Tahoe), sulfur dioxide (1-hour and 24-hour), nitrogen dioxide, suspended particulate matter - PM_{10}, and visibility reducing particles are values that are not to be exceeded. The standards for sulfates, Lake Tahoe carbon monoxide, lead, hydrogen sulfide, and vinyl chloride are not to be equaled or exceeded. If the standard is for a 1-hour, 8-hour or 24-hour average (i.e., all standards except for lead and the PM_{10} annual standard), then some measurements may be excluded. Measurements are excluded that CARB determines would occur less than once per year on the average. The Lake Tahoe carbon monoxide standard is 6.0 ppm, a level one-half the national standard and two-thirds the State standard.

[2] National standards shown are the "primary standards" designed to protect public health. National standards other than for O_3, particulates and those based on annual averages are not to be exceeded more than once a year. The 1-hour O_3 standard is attained if, during the most recent three-year period, the average number of days per year with maximum hourly concentrations above the standard is equal to or less than one. The 8-hour O_3 standard is attained when the 3-year average of the 4th highest daily concentrations is 0.070 ppm or less. The 24-hour PM_{10} standard is attained when the 3-year average of the 99th percentile of monitored concentrations is less than 150 µg/m$_3$. The 24-hour $PM_{2.5}$ standard is attained when the 3-year average of 98th percentiles is less than 35 µg/m^3.

[3] Except for the national particulate standards, annual standards are met if the annual average falls below the standard at eve ry site. The national annual particulate standard for PM_{10} is met if the 3-year average falls below the standard at every site.

Table 4.2-2: State and Federal Ambient Air Quality Standards

Pollutant	Averaging Time	State Standards[1]	Federal Standards[2]

The annual $PM_{2.5}$ standard is met if the 3-year average of annual averages spatially-averaged across officially designed clusters of sites falls below the standard.

NAAQS are set by the EPA at levels determined to be protective of public health with an adequate margin of safety.

4 On October 1, 2015, the national 8-hour O_3 primary and secondary standards were lowered from 0.075 to 0.070 ppm. An area will meet the standard if the fourth-highest maximum daily 8-hour O_3 concentration per year, averaged over three years, is equal to or less than 0.070 ppm. EPA will make recommendations on attainment designations by October 1, 2016, and issue final designations October 1, 2017. Nonattainment areas will have until 2020 to late 2037 to meet the health standard, with attainment dates varying based on the O_3 level in the area.

5 The national 1-hour O_3 standard was revoked by the EPA on June 15, 2005.

6 In June 2002, CARB established new annual standards for $PM_{2.5}$ and PM_{10}.

7 The 8-hour California O_3 standard was approved by the CARB on April 28, 2005 and became effective on May 17, 2006.

8 On June 2, 2010, the EPA established a new 1-hour SO_2 standard, effective August 23, 2010, which is based on the 3-year average of the annual 99th percentile of 1-hour daily maximum concentrations. The existing 0.030 ppm annual and 0.14 ppm 24-hour SO_2 NAAQS however must continue to be used until one year following EPA initial designations of the new 1 hour SO_2 NAAQS.

9 In December 2012, EPA strengthened the annual $PM_{2.5}$ NAAQS from 15.0 to 12.0 µg/m^3. In December 2014, the EPA issued final area designations for the 2012 primary annual $PM_{2.5}$ NAAQS. Areas designated "unclassifiable/attainment" must continue to take steps to prevent their air quality from deteriorating to unhealthy levels. The effective date of this standard is April 15, 2015.

10 CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure below which there are no adverse health effects determined.

11 National lead standards, rolling 3-month average: final rule signed October 15, 2008. Final designations effective December 31, 2011.

Source: South Coast Air Quality Management District, *Air Quality Management Plan*, 2016; California Air Resources Board, *Ambient Air Quality Standards*, May 6, 2016.

California Air Resources Board Air Quality and Land Use Handbook

CARB published the Air Quality and Land Use Handbook in April 2005 to serve as a general guide for considering impacts to sensitive receptors from facilities that emit toxic air contaminant (TAC) emissions (CARB, 2005). The recommendations provided therein are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. The goal of the guidance document is to protect sensitive receptors, such as children, the elderly, acutely ill, and chronically ill persons, from exposure to TAC emissions. Some examples of CARB's siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week); and (3) avoid siting sensitive receptors within 300 feet of any dry cleaning operation using perchloroethylene and within 500 feet of operations with two or more machines.

California Air Resources Board On-Road and Off-Road Vehicle Rules

In 2004, CARB adopted an Airborne Toxic Control Measure (ATCM) to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel PM and other TACs. The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given time.

In 2008 CARB approved the Truck and Bus regulation to reduce NO_X, PM_{10}, and $PM_{2.5}$ emissions from existing diesel vehicles operating in California. The requirements were subsequently amended and apply to nearly all diesel fueled trucks and busses with a gross vehicle weight rating greater than 14,000 pounds. For the largest trucks in the fleet, those with a gross vehicle weight rating greater than 26,000 pounds, there are two methods to comply with the requirements. The first way is for the fleet owner to retrofit or replace engines, starting with the oldest engine model year, to meet 2010 engine standards, or better. This is phased over eight years, starting in 2015 and would be fully implemented by 2023, meaning that all trucks operating in the state subject to this option would meet or exceed the 2010 engine emission standards for NO_X and PM by 2023. The second option, if chosen, requires fleet owners, starting in 2012, to retrofit a portion of their fleet with diesel particulate filters achieving at least 85 percent removal efficiency, so that by January 1, 2016 their entire fleet is equipped with diesel particulate filters. However, diesel particulate filters do not typically lower NO_X emissions. Thus, fleet owners choosing the second option must still comply with the 2010 engine emission standards for their trucks and busses by 2020.

In addition to limiting exhaust from idling trucks, CARB has promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. The regulation, aims to reduce emissions by installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation is staggered based on fleet size (which is the total of all off-road horsepower under common ownership or control), with the largest fleets to begin compliance by January 1, 2014. Each fleet must demonstrate compliance through one of two methods. The first option is to calculate and maintain fleet average emissions targets, which encourages the retirement or repowering of older equipment and rewards the introduction of newer cleaner units into the fleet. The second option is to meet the Best Available Control Technology (BACT) requirements by turning over or installing Verified Diesel Emission Control Strategies (e.g., engine retrofits) on a certain percentage of its total fleet horsepower. The compliance schedule requires that BACT turnovers or retrofits be fully implemented by 2023 in all equipment in large and medium fleets and across 100 percent of small fleets by 2028.

California AB 1493, enacted on July 22, 2002, required the CARB to develop and adopt regulations that reduce emissions from passenger vehicles and light duty trucks. The standards phased in during the 2009 through 2016 model years. The near term (2009–2012) standards were expected to result in about a 22 percent reduction compared with the 2002 fleet, and the mid-term (2013–2016) standards were expected to result in about a 30 percent reduction. Several technologies stand out as providing significant reductions in emissions at favorable costs. These include discrete variable valve lift or camless valve actuation to optimize valve operation rather than relying on fixed valve timing and lift as has historically been done; turbocharging to boost power and allow for engine downsizing; improved multi-speed transmissions; and improved air conditioning systems that operate optimally, leak less, and/or use an alternative refrigerant.

In January 2012, CARB approved the Advanced Clean Cars program, a new emissions-control program for model years 2015 through 2025. The program includes components to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars. The zero-emissions vehicle (ZEV) program will act as the focused technology of the Advanced Clean Cars program by requiring

manufacturers to produce increasing numbers of ZEVs and plug-in hybrid electric vehicles (PHEV) in the 2018 to 2025 model years.

In May 2016, CARB released the updated Mobile Source Strategy that demonstrates how the state can simultaneously meet air quality standards, achieve GHG emission reduction targets, decrease health risk from transportation emissions, and reduce petroleum consumption over the next fifteen years, through a transition to zero-emission vehicles (ZEVs), cleaner transit systems and reduction of vehicle miles traveled. The Mobile Source Strategy calls for 1.5 million ZEVs (including plug-in hybrid electric, battery-electric, and hydrogen fuel cell vehicles) by 2025 and 4.2 million ZEVs by 2030. It also calls for more stringent GHG requirements for light-duty vehicles beyond 2025 as well as GHG reductions from medium-duty and heavy-duty vehicles and increased deployment of zero-emission trucks primarily for class 3 – 7 "last mile" delivery trucks in California. Statewide, the Mobile Source Strategy would result in a 45 percent reduction in GHG emissions, and a 50 percent reduction in the consumption of petroleum-based fuels.

REGIONAL

South Coast Air Quality Management District

The SCAQMD is responsible for air quality planning in the Air Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles. All projects are subject to SCAQMD rules and regulations in effect at the time of construction.

The SCAQMD is also the lead agency in charge of developing the AQMP, with input from the Southern California Association of Governments (SCAG) and CARB. The AQMP is a comprehensive plan that includes control strategies for stationary and area sources, as well as for on-road and off-road mobile sources. SCAG has the primary responsibility for providing future growth projections and the development and implementation of transportation control measures. CARB, in coordination with federal agencies, provides the control element for mobile sources.

The 2016 AQMP was adopted by the SCAQMD Governing Board on March 3, 2017. The purpose of the AQMP is to set forth a comprehensive and integrated program that would lead the SCAG into compliance with the federal 24-hour Fine Particulate Matter ($PM_{2.5}$) air quality standard, and to provide an update to the SCAQMD's commitments towards meeting the federal 8-hour Ozone (O_3) standards. The AQMP incorporates the latest scientific and technological information and planning assumptions, including the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and updated emission inventory methodologies for various source categories.

The SCAQMD has published the CEQA Air Quality Handbook (approved by the SCAQMD Governing Board in 1993 and augmented with guidance for Local Significance Thresholds [LST] in 2008). The SCAQMD guidance helps local government agencies and consultants to develop environmental documents required by CEQA and provides identification of suggested thresholds of significance for criteria pollutants for both construction and operation. With the help of the CEQA Air Quality Handbook and associated guidance, local land use planners and consultants are able to analyze and document how proposed and existing

projects affect air quality in order to meet the requirements of the CEQA review process. The SCAQMD periodically provides supplemental guidance and updates to the handbook on their website.

LOCAL

City of Downey General Plan, Vision 2025

The Safety Element of the General Plan establishes the City's approach to ensure a safe environment for its residents, visitors, and businesses. The Safety Element establishes goals policies and implementation programs to guide and direct local government decision-making in safety related matters for the City of Downey. The City of Downey outlines goals and policies within the Conservation Chapter of Downey Vision 2025 that are applicable to the proposed Project as follows, and other goals and policies that are applicable to the various environmental topics addressed in the respective chapters of this PEIR:

- **Goal 4.5**. Encourage activities that improve air quality.
    - **Policy 4.5.1:** Pursue available means and opportunities to reduce air particulate and pollutants within the city and region.
        - **Program 4.5.1.4:** Encourage alternative modes of travel, such as walking and cycling, to vehicle use and alternative modes of employment, such as telecommuting and home-based businesses, to reduce emissions associated with vehicle use.
        - **Program 4.5.1.5:** Promote the use of alternative fuel vehicles, including clean diesel, compressed natural gas, hydrogen, that result in reduced emissions, including in instances involving City operations.
        - **Program 4.5.1.7:** Pursue means to prohibit unnecessary operation of engines.

City of Downey Municipal Code §3313

Chapter 1 – Downey Building Code, §3313. Construction Site Operations and Controls. Dust, water, mud, materials of construction, or debris shall be contained on the building site. No spray painting, demolition, maintenance, or other building construction operations shall be carried on in a manner that will be detrimental or injurious to the public or adjacent property or pedestrians or vehicles using streets or sidewalks in the vicinity of the operation.

City of Downey Municipal Code §6901

Article 6, Chapter 9 – Mobile Source Air Pollution Reduction Fees, §6901. Intent and Purpose. This chapter is intended to support the South Coast Air Quality Management District's imposition and distribution of a vehicle registration fee as authorized by §§ 44220 through 44247 of the Health and Safety Code. It is further intended to bring the City into compliance with requirements set forth in said sections in order to receive fee revenues for the purpose of implementing programs to reduce air pollution from motor vehicles.

City of Downey Municipal Code §2417

Chapter 4 — Departments, Boards and Commissions of the City, §2417. Duties. The duties of said Public Works Committee shall be advisory in nature, including review and making recommendations to the City Council regarding parking and traffic; solid waste and recycling; wastewater collection and

disposal; air quality; hazardous waste; public utilities; transportation and mobility; water supply; energy consumption and conservation; urban runoff and water quality; urban blight and streetscape; other matters affecting a healthy and safe environment; and any other matters specifically requested to be reviewed by the City Council.

4.2.4 SIGNIFICANCE CRITERIA AND THRESHOLDS

The State CEQA Guidelines Initial Study Checklist have been used as significance criteria in this section. A project would result in a significant impact related to air quality if it would:

- Conflict with or obstruct implementation of the applicable air quality plan (see Impact 4.2-1);
- 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 (see Impact 4.2-2);
- Expose sensitive receptors to substantial pollutant concentrations (see Impact 4.2-3); and/or
- Result in other emissions such as those leading to odors adversely affecting a substantial number of people (see Impact 4.2-4).

SCAQMD Thresholds. The significance criteria established by SCAQMD may be relied upon to make the above determinations. According to the SCAQMD, an air quality impact is considered significant if the Project would violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has established thresholds of significance for air quality during construction and operational activities of land use development projects, as shown in **Table 4.2 3: South Coast Air Quality Management District Emissions Thresholds.**

Table 4.2-3: South Coast Air Quality Management District Emissions Thresholds

Criteria Air Pollutants and Precursors	Construction-Related	Operational-Related
Reactive Organic Gases (ROG)	75	55
Carbon Monoxide (CO)	550	550
Nitrogen Oxides (NO_X)	100	55
Sulfur Oxides (SO_X)	150	150
Coarse Particulates (PM_{10})	150	150
Fine Particulates ($PM_{2.5}$)	55	55

Source: South Coast Air Quality Management District, *SCAQMD Air Quality Significance Thresholds,* April 2019.

Localized Carbon Monoxide. In addition to the daily thresholds listed above, development associated with the Project would also be subject to the ambient air quality standards. These are addressed through an analysis of localized CO impacts. The significance of localized impacts depends on whether ambient CO levels near the project site are above the state and federal CO standards (the more stringent California standards are 20 ppm for 1-hour and 9 ppm for 8-hour). The Air Basin has been designated as in attainment under the 1-hour and 8-hour standards.

METHODOLOGY AND ASSUMPTIONS

The proposed Project would be evaluated against the aforementioned significance criteria/thresholds, as the basis for determining the impact's level of significance concerning air quality. In addition to the design characteristics of future development, this analysis considers the existing regulatory framework (i.e., laws, ordinances, regulations, and standards) that avoid or reduce the potentially significant environmental impact. Where significant impacts remain despite compliance with the regulatory framework, feasible mitigation measures are recommended, to avoid or reduce the Project's potentially significant environmental impacts.

This analysis of potential impacts to air quality emissions examines the Project's temporary (i.e., construction) and permanent (i.e., operational) effects-based significance criteria/threshold's application. For each criterion, the analyses address both temporary (construction) and long-term (operational) impacts, as applicable. The impact conclusions consider the potential for changes in environmental conditions, as well as compliance with the regulatory framework enacted to protect the environment.

Consistency with Air Quality Plan

The SCAQMD is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment of the NAAQS (e.g., ozone and $PM_{2.5}$). The SCAQMD's 2016 AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving the NAAQS. These strategies are developed, in part, based on regional growth projections prepared by the SCAG. SCAG has the responsibility of preparing and approving portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is required by law to ensure that transportation activities conform to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS. The RTP/SCS includes transportation programs, measures, and strategies generally designed to reduce VMT, which are contained in the AQMP. SCAQMD combines its portion of the AQMP with those prepared by SCAG.

As part of its air quality planning, SCAG has prepared the Regional Comprehensive Plan and Guide and the Connect SoCal –2020-2045 RTP/SCS. On September 3, 2020, SCAG's Regional Council adopted the 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS was determined to conform to the federally mandated SIP for the attainment and maintenance of the NAAQS. On October 30, 2020, CARB also accepted SCAG's determination that the RTP/SCS met the applicable state GHG emissions targets. The 2020-2045 RTP/SCS will be incorporated into the forthcoming 2022 AQMP. Both the Regional Comprehensive Plan and AQMP are based, in part, on projections originating with county and city general plans.

The 2016 AQMP was prepared to accommodate growth, reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, return clean air to the region, and minimize the impact on the economy. Projects that are consistent with the assumptions used in the AQMP do not interfere with attainment because the growth is included in the projections utilized in the formulation of the AQMP. Thus, projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's numeric indicators.

Construction Emissions

Future construction associated with implementation of the Specific Plan has the potential to generate temporary criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and forklifts, and through vehicle trips generated from workers and haul trucks traveling to and from the Focus Area. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. During the finishing phase of building construction, paving operations and the application of architectural coatings and other building materials would potentially release VOCs. The assessment of construction air quality impacts considers each of these potential sources. Mobile source emissions, primarily NO_X, would result from the use of construction equipment such as dozers and loaders. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions. Quantifying individual future development's air emissions from short-term, temporary construction-related activities is not possible due to project-level variability and uncertainties concerning locations, detailed site plans, construction schedules/duration, equipment requirements, etc., among other factors, which are presently unknown. Since these parameters can vary so widely (and individual project-related construction activities would occur over time dependent upon numerous factors), quantifying precise construction-related emissions and impacts would be speculative.

Operational Emissions

Operation of the Project would generate criteria pollutant emissions from Project-generated vehicle trips traveling to and from the Focus Area, energy sources on the site such as natural gas combustion, area sources such as landscaping equipment and the use of consumer products. However, no specific development projects are proposed at this time. In order to quantify the level of emissions associated with individual development projects and compare emissions to established project-level SCAQMD thresholds, specific information regarding the size and type of development would be needed.

Cumulative Impacts

The SCAQMD CEQA Air Quality Handbook states that the "Handbook is intended to provide local governments, project proponents, and consultants who prepare environmental documents with guidance for analyzing and mitigating air quality impacts of projects."[2] The SCAQMD CEQA Air Quality Handbook also states that "[f]rom an air quality perspective, the impact of a project is determined by examining the types and levels of emissions generated by the project and its impact on factors that affect air quality. As such, projects should be evaluated in terms of air pollution thresholds established by the District." The SCAQMD has also provided guidance on an acceptable approach to addressing the cumulative impacts issue for air quality as discussed below.[3]

> As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR… Projects that exceed the Project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and

[2] South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993.

[3] South Coast Air Quality Management District, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, Appendix D, August 2003.

cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.

Therefore, consistent with accepted and established SCAQMD cumulative impact evaluation methodologies, the potential for the Project to result in cumulative impacts from regional emissions is assessed based on the SCAQMD thresholds.

4.2.5 IMPACTS AND MITIGATION MEASURES

Impact 4.2-1: Would the project's construction and operations conflict with implementation of the applicable air quality plan?

Significant and Unavoidable. The current plan is the 2016 AQMP adopted on March 3, 2017. The 2016 AQMP is designed to meet the state and federal Clean Air Act planning requirements and focuses on federal ozone and ultra-fine particulate matter ($PM_{2.5}$) standards. The SCAQMD's AQMP was prepared to: accommodate growth; reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD; and attain clean air within the region. Projects that are considered consistent with the AQMP would not interfere with attainment because this growth is included in the projections used to formulate the AQMP.

The SCAQMD's CEQA Handbook identifies two key indicators of consistency with the AQMP:

1. Whether a project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
2. Whether a project will exceed the assumptions in the AQMP based on the year of project buildout and phase.

Concerning the first criterion, construction activities associated with individual development projects facilitated by the RLASCSP could potentially exceed AQMD significance thresholds. Construction activity that would occur over the next 14 years in accordance with the RLASCSP would cause temporary, short-term emissions of various air pollutants. NO_X and CO would be emitted by the operation of construction equipment, while fugitive dust (PM_{10}) would be emitted by activities that disturb the soil, such as grading and excavation, road construction and building demolition and construction.

Information regarding specific development projects, construction phase timing, earthwork volumes, and the locations of receptors would be needed in order to quantify the level of impact associated with construction activity. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements. Additionally, at a programmatic level, due to the size of the Project, operational emissions would exceed thresholds and impacts would be potentially significant. As discussed in Impact 4.2-2 below, impacts would be significant and unavoidable as future projects facilitated by the RLASCSP may increase the frequency or severity of existing air quality violations.

Concerning the second criterion, the 2016 AQMP, the most recent AQMP adopted by the SCAQMD, incorporates local municipalities' general plans and SCAG's Connect SoCal – 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy socioeconomic forecast projections of regional

population, housing and employment growth. **Table 4.2-4: Los Angeles County and Downey Regional Growth Estimates**, shows the SCAG regional growth projections.

Table 4.2-4: Los Angeles County and Downey Regional Growth Estimates

	2016		2045	
	County of Los Angeles	City of Downey	County of Los Angeles	City of Downey
Population	10,111,000	113,300	11,677,000	119,200
Households	3,319,000	32,600	4,125,000	34,100
Jobs	4,838,000	42,900	5,382,000	45,800

Source: SCAG Connect SoCal RTP/SCS.

The RLASCSP would expand and enhance commercial opportunities to serve a local and regional customer base, allow for and complement expansion of County regional facilities, and provide opportunities for TOD adjacent to the proposed Metro West Santa Ana Branch (WSAB) Transit Corridor Project (Gardendale Transit Station). Accordingly, the Focus Area could accommodate 700 dwelling units (DUs) and 1,130,000 square feet (SF) of new non-residential (commercial, retail, office, public facilities, etc.) uses. According to the California Department of Finance (DOF) 2020 housing estimates, the average household size for the City of Downey is 3.29 persons per household. Assuming 3.29 per dwelling unit, the RLASCSP has the potential to generate 2,303 additional residents. According to the California DOF, the City has an estimated current population of 112,186. The estimated population increase of 2,303 new residents is within the forecasted population increase by SCAG for the City of Downey of 5,900 residents between 2016 and 2045. Assuming no change in the average household size and no other changes to the number of housing units in Downey, implementation of the Specific Plan could increase the City population to 114,489 over the course of Specific Plan buildout, an increase of 2 percent. This population increase would not result in a total population that exceeds SCAG's forecasted population for the City of 119,200.

According to SCAG's employment density study, the employment density factor for non-residential commercial/retail development in Los Angeles County is 585 SF per employee. Therefore, the non-residential component of the Specific Plan would yield 1,932 new permanent employment opportunities which could include both full-time and part-time employment positions with varying salaries including minimum wage positions. The 1,932 jobs represent approximately 66 percent of the City's total forecasted increase in employment between 2016 and 2045. As this employment increase would be within SCAG's and the City of Downey's forecasted 2045 employment growth for the City, employment growth generated by the Specific Plan would be consistent with the AQMP.

As described above, the population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on local City plans and policies; these are used by SCAG in all phases of implementation and review. Additionally, the SCAQMD has incorporated these same projections into the 2016 AQMP. Implementation of the Specific Plan would not exceed the population growth forecasted in the RTP/SCS, on which the 2016 AQMP is based. The RLASCSP, which encourages transit-oriented development, infill development with access to alternative transportation, is consistent with regional policies established in the 2020 Connect SoCal RTP/SCS that promote alternative modes of transport and "livable corridors" to reduce air quality impacts from vehicle emissions. In addition, Specific Plan implementation would improve the job-housing balance in the City, which reduces vehicle miles traveled by residents to employment opportunities outside the City. The Specific Plan is consistent with the goals

of the RTP/SCS to reduce vehicle miles traveled and associated air pollutant emissions. Future projects within the Specific Plan area would be required to demonstrate consistency with the AQMP. As such, the Project would not result in substantial unplanned growth or unaccounted for growth in the General Plan or job growth projections used by the SCAQMD to develop the AQMP.

However, as discussed below, the development potential of the Specific Plan would potentially exceed SCAQMD thresholds and implementation of all SCAQMD rules, regulations, and control measures may not be feasible for future development projects. As such, impacts in this regard would be significant and unavoidable despite the fact that the Specific Plan would be consistent with the growth forecasts utilized in the development of the AQMP.

Mitigation Measures

Refer to Mitigation Measure AQ-1. No additional feasible mitigation measures are proposed at the programmatic level to reduce future construction and operational emissions associated with development facilitated by the RLASCSP. Future construction and operational emissions would conflict with implementation of the AQMP. Impacts remain significant and unavoidable.

Impact 4.2-2: 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?

Significant and Unavoidable.

CONSTRUCTION

The RLASCSP would allow for 700 DUs and 1,130,000 SF of new non-residential (commercial, retail, office, public facilities, etc.). Construction activities associated with Specific Plan implementation would result in fugitive dust and exhaust emissions. As described below, grading and hauling tend to generate the greatest fugitive dust and exhaust emissions. Additionally, demolition of buildings with asbestos containing materials could occur. It is noted that although the RLASCSP identifies future land uses, it does not contain specific development proposals.

Fugitive Dust. Construction activities are a source of fugitive dust (PM_{10} and $PM_{2.5}$) emissions that may have a substantial, temporary impact on local air quality. Fugitive dust emissions vary substantially from day to day, depending on the level of activity, specific operations, and weather conditions. Fugitive dust (PM_{10}) poses a serious health hazard alone or in combination with other pollutants. Fine Particulate Matter ($PM_{2.5}$) is mostly derived from combustion sources, such as automobiles, trucks, and other vehicle exhaust, as well as from stationary sources. These particles are either directly emitted or are formed in the atmosphere from the combustion of gases such as NO_X and SO_X combining with ammonia. $PM_{2.5}$ components from material in the earth's crust, such as dust, are also present, with the amount varying in different locations.

Exhaust. Exhaust emissions would be generated by vehicles and equipment operations on future construction sites, such as tractors, dozers, scrapers, backhoes, cranes, and trucks. The majority of construction equipment and vehicles would be diesel powered, which tends to be more efficient than gasoline-powered equipment. Diesel-powered equipment produces lower CO and hydrocarbon emissions than gasoline equipment, but produces greater amounts of NO_X, SO_X, and particulates per hour of activity.

The transportation of equipment and materials to and from project sites, as well as construction workers traveling to and from the sites, would also generate vehicle emissions during construction.

Grading/Hauling. Depending on the amount of over-excavation and re-compaction that may be necessary to create a suitable building pad, future development facilitated may require the import and export of fill material. Although these activities may create additional dust and PM_{10} and $PM_{2.5}$, as well as truck-related emissions, they would be mitigated to less than significant levels through implementation of standard dust control practices required as part of the grading permit (periodic site watering, covering laden trucks with tarps, and periodic street sweeping).

Asbestos. It is possible that asbestos-containing materials may be present within existing buildings that may be modified or demolished within the Specific Plan area. Standard practice includes conducting an asbestos assessment for candidate buildings to determine the presence of asbestos. If identified, an asbestos abatement contractor would be retained to develop an abatement plan and remove the asbestos containing materials, in accordance with local, state, and Federal requirements. After removal, demolition may proceed without significant concern to the release of asbestos fibers into the air.

As the Project identifies future land uses and does not contain specific development proposals, construction-related emissions that may occur at any one time are speculative and cannot be accurately determined at this stage of the planning process. Construction activities associated with future development would occur in incremental phases over time based upon numerous factors, including market demand, and economic and planning considerations. Construction activities would consist of grading, demolition, excavation, cut-and-fill, paving, building construction, and application of architectural coatings. In addition, construction worker vehicle trips, building material deliveries, soil hauling, etc., would occur during construction. Construction-related emissions are typically site-specific and depend upon multiple variables. Quantifying individual future development's air emissions from short-term, temporary construction-related activities is not possible due to project-level variability and uncertainties concerning locations, detailed site plans, construction schedules/duration, equipment requirements, etc., among other factors, which are presently unknown. Since these parameters can vary so widely (and individual project-related construction activities would occur over time dependent upon numerous factors), quantifying precise construction-related emissions and impacts would be speculative.

Project implementation would facilitate development throughout the City to create a mixed-use, compact, and multi-modal environment; promote sustainable principles in design and development; and support land uses that further regional transportation and transit planning objectives. Future development would re-capture and re-use underutilized land area in the City. As described above, such development would result in new temporary construction emissions being generated. Unlike an individual project for which project-specific construction information is available, it is infeasible to quantify the individual projects that would contribute incrementally to construction emissions throughout the City. As specific development projects are unknown at this time, quantifying individual future development's air emissions from short-term, temporary construction-related activities is not possible due to project-level variability and uncertainties concerning locations, detailed site plans, construction schedules/duration, equipment requirements, etc., among other factors, which are presently unknown. However, generally speaking, construction equipment emits criteria pollutants, and construction activities such as grading generate fugitive dust emissions including PM_{10} and $PM_{2.5}$.

Depending on how development proceeds, construction-related emissions associated with future development could exceed SCAQMD thresholds of significance. In addition to site-specific mitigation that would be determined on a project-by-project basis compliance with existing and SCAQMD practices would be required. Standard Condition (SC) 4.2-1 requires adherence to SCAQMD Rule 403 (Fugitive Dust) would reduce fugitive dust emissions generated at future construction sites by requiring dust abatement measures. State Vehicle Code §23114 requires all trucks hauling excavated or graded material to the prevention of such material spilling onto public streets. SC 4.2-2 requires future construction contractors to adhere to SCAQMD Rule 1113 (Architectural Coatings) to limit volatile organic compounds from architectural coatings. Additionally, all building demolition activities would be required to adhere to SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). Additionally, **Mitigation Measure (MM) AQ-1** is required to ensure that future development projects that are not exempt from CEQA have construction-related air quality impacts analyzed and feasible mitigation incorporated as necessary to reduce potential impacts. However, due to the unknown nature of future construction activities associated with implementation of the Specific Plan, the potential exists that SCAQMD thresholds may be exceeded. Therefore, construction-related air quality impacts would be considered significant and unavoidable due to the potential magnitude of construction that could occur from Specific Plan implementation.

OPERATIONAL EMISSIONS

The majority of the Specific Plan-related operational emissions would be due to vehicle trips to, from, and within the Specific Plan area and local region. Specific data for the types and amounts of future development were entered into CalEEMod to determine the pollutant emissions anticipated at full Project buildout (i.e., 700 DUs and 1,130,000 SF of new non-residential uses). Where project-specific data was not available, CalEEMod defaults were used.

Mobile and stationary source operational emissions would result from normal daily activities after occupancy of individual development projects. Mobile source emissions would be generated by the motor vehicles traveling to and from their respective sites. Stationary area source emissions would be generated by natural gas consumption for space and water heating devices, landscape maintenance equipment operations, and use of consumer products. Stationary energy emissions would result from energy consumption associated with the future development. The estimated operational emissions associated with each of these sources are presented in **Table 4.2-5: Operational Air Emissions**. The table shows that the total emissions from future development would exceed the SCAQMD thresholds for ROG, NO_X, and CO. While some of the individual development projects may be able to incorporate design and reduction features that would reduce emissions to below SCAQMD thresholds, the overall Project must be evaluated for significance consideration.

Operations associated with buildout of the Specific Plan's full development capacity would occur in incremental phases over time based upon numerous factors, including market demand, and economic and planning considerations. Quantifying future development's individual operational air emissions is not possible due to project-level variability and uncertainties concerning locations, detailed site plans, etc., among other factors, which are presently unknown. Since these factors can vary so widely (and individual project-related operations would occur over time dependent upon numerous factors), quantifying precise operational emissions and impacts would be impractical. Depending on how development proceeds,

operational emissions associated with future development could exceed SCAQMD thresholds of significance.

Table 4.2-5: Operational Air Emissions

Source	Pollutant (Maximum Pounds per Day)					
	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Sulfur Dioxide SO_2)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
Area Source Emissions	43.21	10.54	62.08	0.07	1.12	1.12
Energy Emissions	0.67	5.93	3.82	0.04	0.46	0.46
Mobile Emissions	50.88	56.59	521.93	1.14	116.44	31.55
Total Emissions	**94.76**	**73.06**	**587.83**	**1.25**	**118.03**	**33.14**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Exceeds Threshold?	**Yes**	**Yes**	**Yes**	**No**	**No**	**No**

Source: CalEEMod version 2020.4.0. Refer to Appendix B for model outputs.

Although project-generated emissions would be expected to exceed SCAQMD recommended thresholds, no specific development projects are proposed at this time. In order to quantify the level of emissions associated with individual development projects and compare emissions to established project-level SCAQMD thresholds, specific information regarding the size and type of development would be needed. Although overall operational emissions associated with the Specific Plan would exceed applicable SCAQMD thresholds for criteria pollutants, any project proposed within the RLASCSP area would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, which may include subsequent CEQA documentation or technical analyses. Projects would also be required to demonstrate consistency with DGP policies and DMC requirements, including those intended to protect public health from air quality impacts. The SCAQMD's significance thresholds would be relied upon to determine the significance level of a future project's operational impact. In addition, individual development projects would be required to comply with energy performance and water efficiency building code requirements established under State Title 24 Energy Regulations, which would further reduce criteria air pollutant emissions. While some of the individual development projects may be able to incorporate design and reduction features that would reduce emissions to below SCAQMD thresholds, the overall project must be evaluated for significance consideration.

Given the general nature of the RLASCSP and the long buildout potential, it is not possible to quantify the exact reduction in emissions that would be provided by typical air quality mitigation measures. At a programmatic level, the proposed Project may not meet the performance standard for annual emissions reductions and could result in a cumulatively considerable net increase of one or more criteria pollutants for which the project region is in nonattainment under an applicable federal or state ambient air quality standard. The thresholds of significance recommended by the SCAQMD were established for individual development projects and are based on the SCAQMD's New Source Review emissions standards for individual sources of new emissions, such as boilers and generators. They do not apply to cumulative development or multiple projects. Project-related air quality emissions would be regional and not confined to the limits of the Specific Plan area. The destinations of motor vehicles, which are the primary

contributors to air pollution, would vary widely and cross many jurisdictional boundaries. Future development projects facilitated by the RLASCSP would occur throughout the buildout period and be subject to comply with SCAQMD standards. **MM AQ-1** requires future site-specific development proposals that are subject to discretionary review to be evaluated for potential air emissions once development details have been determined and are available. Individual development projects may not result in significant air quality emissions. However, at a programmatic level, due to the size of the Project, operational emissions would exceed thresholds and impacts would be potentially significant.

Standard Conditions

SC 4.2 -1 **Dust Control.** During construction of future development within the Specific Plan area, each project applicant shall require all construction contractors to comply with South Coast Air Quality Management District's (SCAQMD's) Rules 402 and 403 in order to minimize short-term emissions of dust and particulates. SCAQMD Rule 402 requires that air pollutant emissions not be a nuisance off-site. SCAQMD Rule 403 requires that fugitive dust be controlled with Best Available Control Measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. This requirement shall be included as notes on the contractor specifications. Table 1 of Rule 403 lists the Best Available Control Measures that are applicable to all construction projects. The measures include, but are not limited to, the following:

- ***Clearing and grubbing:*** Apply water in sufficient quantity to prevent generation of dust plumes.
- ***Cut and fill:*** Pre-water soils prior to cut and fill activities and stabilize soil during and after cut and fill activities.
- ***Earth-moving activities*****:** Pre-apply water to depth of proposed cuts; re-apply water as necessary to maintain soils in a damp condition and to ensure that visible emissions do not exceed 100 feet in any direction; and stabilize soils once earth-moving activities are complete.
- ***Importing/exporting of bulk materials:*** Stabilize material while loading to reduce fugitive dust emissions; maintain at least six inches of freeboard on haul vehicles; and stabilize material while transporting to reduce fugitive dust emissions.
- ***Stockpiles/bulk material handling:*** Stabilize stockpiled materials; stockpiles within 100 yards of off-site occupied buildings must not be greater than 8 feet in height, must have a road bladed to the top[4] to allow water truck access, or must have an operational water irrigation system that is capable of complete stockpile coverage.
- ***Traffic areas for construction activities:*** Stabilize all off-road traffic and parking areas; stabilize all haul routes; and direct construction traffic over established haul routes.

Rule 403 defines large operations as projects with 50 or more acres of grading or with a daily earth-moving volume of 5,000 cubic yards at least 3 times in 1 year. Future development within the Specific Plan would potentially be considered a large operation.

[4] Refers to a road to the top of the pile.

Large operations are required to implement additional dust-control measures (as specified in Tables 2 and 3 of Rule 403); provide additional notifications, signage, and reporting; and appoint a Dust Control Supervisor.

The Dust Control Supervisor is required to:

- Be employed by or contracted with the Property Owner or Developer;
- Be on the site or available on-site within 30 minutes during working hours;
- Have the authority to expeditiously employ sufficient dust mitigation measures to ensure compliance with all Rule 403 requirements; and
- Have completed the AQMD Fugitive Dust Control Class and have been issued a valid Certificate of Completion for the class.

SC 4.2-2 **Architectural Coatings.** Architectural coatings shall be selected so that the VOC content of the coatings is compliant with SCAQMD Rule 1113. This requirement shall be included as notes on the contractor specifications.

Mitigation Measures

MM AQ-1 Proposed development projects that are not exempt from CEQA shall have construction and operational air quality impacts analyzed using the latest available air emissions model, or other analytical method determined in conjunction with the SCAQMD. The results of the air quality impact analysis shall be included in the development project's CEQA documentation. To address potential localized impacts, the air quality analysis may incorporate SCAQMD's Localized Significance Threshold analysis or other appropriate analyses as determined in conjunction with South Coast AQMD. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts.

Impact 4.2-3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Less than Significant with Mitigation Incorporated. RLASCSP implementation could expose sensitive receptors to elevated pollutant concentrations during construction or operational activities if it would cause or contribute significantly to elevated levels. Exposure to pollutant concentrations in exceedance of the NAAQS or CAAQS are generally considered substantial.

CARBON MONOXIDE HOTSPOTS

The SCAQMD defines typical sensitive receptors as residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. When evaluating potential air quality impacts to sensitive receptors, the SCAQMD is primarily concerned with high localized concentrations of CO. Motor vehicles, and traffic-congested roadways and intersections are the primary source of high localized CO concentrations. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed CO "hotspots."

It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the

last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined. The Air Basin was re-designated as attainment in 2007 and is no longer addressed in the SCAQMD's AQMP.

Additionally, SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Air Basin: (1) Wilshire Boulevard and Veteran Avenue; (2) Sunset Boulevard and Highland Avenue; (3) La Cienega Boulevard and Century Boulevard; and (4) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of approximately 100,000 vehicles per day. This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (one-hour average) and 3.2 (eight-hour average) at Wilshire Boulevard and Veteran Avenue. When added to the existing background CO concentrations, the screening values would be 6.8 ppm (one-hour average) and 4.5 ppm (eight-hour average).

Given that the RLASCSP included a Transit Oriented Development (TOD) Sub-District, specifically with the future Metro WSAB Gardendale Transit Station, Project traffic volumes are not anticipated to exceed 100,000 vehicles per day or generate a CO hotspot. Therefore, CO hotspots are not an environmental impact of concern for the proposed Project. Localized air quality impacts related to mobile-source emissions would therefore be less than significant. As a result, no significant impacts would occur, and no additional mitigation measures are required.

TOXIC AIR CONTAMINANTS: CONSTRUCTION AND OPERATIONS

Project construction would involve demolition of multiple structures within the Specific Plan area. If it is determined that the existing structures contain asbestos-containing materials, the Project would limit asbestos emissions by implementing the appropriate procedures and practices in accordance with SCAQMD Rule 1403.

Construction equipment and associated heavy-duty truck traffic generate diesel exhaust, which is a known toxic air contaminants (TAC). Construction would result in the generation of diesel particulate matter (DPM) emissions from the use of off-road diesel equipment required for grading and excavation, paving, and other construction activities. For construction activity, DPM is the primary toxic air contaminant of concern. On-road diesel-powered haul trucks traveling to and from the construction area to deliver materials and equipment are less of a concern because they would not stay on the site for long durations. Diesel exhaust from construction equipment operating at the site poses a health risk to nearby sensitive receptors. There are existing sensitive receptors throughout the perimeter boundaries of the RLASCSP, notably the single-family residences to the east, north, and west as well as the St. Pius X – St. Matthias Academy.

The Project would not be considered a source of TACs that would pose a possible risk to off-site uses. The Project involves the future development of 700 DUs of residential land uses and 1,130,000 sf of non-residential commercial retail uses. The Project would not include stationary sources that emit TACs

and would not generate a significant amount of heavy-duty truck trips (a source of diesel particulate matter [DPM]). Therefore, no impacts to surrounding receptors associated with TACs would occur.

CARB's Air Quality and Land Use Handbook: A Community Health Perspective recommends against siting sensitive receptors within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day. The primary concern with respect to heavy-traffic roadway adjacency is the long-term effect of TACs, such as diesel exhaust particulates, on sensitive receptors. The primary source of diesel exhaust particulates is heavy-duty trucks on freeways and high-volume arterial roadways. The future Metro WSAB Gardendale Transit Station bisects a portion of the western RLASCSP area. Residential units could be constructed within 500 feet of the railroad right-of-way. The Project would not result in direct construction of residential or non-residential uses, but would facilitate and provide a policy framework for future development within the Project area. While the Project does not propose any development, it can be assumed that future development could potentially result in direct impacts through construction and operation of residential land uses within TAC emitters within the Focus Area. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, which may require additional studies for future projects.

Therefore, implementation of MM AQ-2 is required to ensure a project-specific Health Risk Assessment (HRA) is conducted for future residential uses located within 500 feet of the Metrolink right-of-way. Implementation of MM AQ-2 would reduce exposure of sensitive receptors to substantial pollutant concentrations to a less than significant level.

Criteria Pollutant Health Effects

In December 2018, the California Supreme Court issued its decision in *Sierra Club* v. *County of Fresno* (6 Cal. 5th 502) (hereafter referred to as the Friant Ranch Decision). The case reviewed the long-term, regional air quality analysis contained in the PEIR for the proposed Friant Ranch development. The Friant Ranch project is a 942-acre master-plan development in unincorporated Fresno County within the San Joaquin Valley Air Basin, an air basin currently in nonattainment for the ozone and $PM_{2.5}$ NAAQS and CAAQS. The Court found that the air quality analysis was inadequate because it failed to provide enough detail "for the public to translate the bare [criteria pollutant emissions] numbers provided into adverse health impacts or to understand why such a translation is not possible at this time." The Court's decision clarifies that environmental documents must connect a project's air quality impacts to specific health effects or explain why it is not technically feasible to perform such an analysis.

NO_X and ROG are precursor emissions that form ozone in the atmosphere in the presence of sunlight where the pollutants undergo complex chemical reactions. It takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources. Breathing ground-level ozone can result health effects that include: reduced lung function, inflammation of airways, throat irritation, pain, burning, or discomfort in the chest when taking a deep breath, chest tightness, wheezing, or shortness of breath. In addition to these effects, evidence from observational studies strongly indicates that higher daily ozone concentrations are associated with increased asthma attacks, increased hospital admissions, increased daily mortality, and other markers of morbidity. The consistency and coherence of the evidence for effects upon asthmatics suggests that ozone can make asthma symptoms worse and can increase sensitivity to asthma triggers.

All criteria pollutants that would be generated by the Project are associated with some form of health risk (e.g., asthma). The potential for pollutants to affect public health depends on a multitude of variables, including how they are dispersed and transported in the atmosphere. As discussed above, both construction and operation of the RLASCSP would most likely exceed thresholds and generate regional ozone precursors (ROG and NO_X) and PM emissions.

Adverse health effects induced by regional criteria pollutant emissions generated by the Project (ozone precursors and PM) are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, the number and character of exposed individuals [e.g., age, gender]). For these reasons, ozone precursors (ROG and NO_X) contribute to the formation of ground-borne ozone on a regional scale, where emissions of ROG and NO_X generated in one area may not equate to a specific ozone concentration in that same area. Similarly, some types of particulate pollutants may be transported over long distances or formed through atmospheric reactions. As such, the magnitude and locations of specific health effects from exposure to increased ozone or regional particulate matter concentrations are the product of emissions generated by numerous sources throughout a region, as opposed to a single individual project.

Technical limitations of existing models to correlate project-level regional emissions to specific health consequences are recognized by air quality management districts throughout the state, including the San Joaquin Valley Air Pollution Control District (SJVAPCD) and SCAQMD, who provided *amici curiae* briefs for the Friant Ranch legal proceedings. In its brief, the SJVAPCD acknowledges that although health risk assessments for localized air toxics, such as DPM, are commonly prepared, "it is not feasible to conduct a similar analysis for criteria air pollutants because currently available computer modeling tools are not equipped for this task." SJVAPCD further notes that "[modeling of] 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," and that any such information would not be "accurate when applied at the local level."

The SCAQMD Amicus Curiae Brief in the Friant Ranch case (April 6, 2015) presents similar information, stating that "it takes a large amount of additional precursor emissions to cause a modeled increase in ambient ozone levels."[5] The SCAQMD also acknowledges that a project emitting NO_X or ROG below their threshold of 10 tons per year "is small enough that its regional impact on ambient ozone levels may not be detected in the regional air quality models" and it would "not be feasible to directly correlate project emissions of VOC or NO_X with specific health impacts from ozone." The State CEQA Guidelines also state that the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the determinations above.

Under California law, the local and regional districts are primarily responsible for controlling air pollution from all sources except motor vehicles. CARB (a branch of the California EPA) is primarily responsible for controlling pollution from motor vehicles. The air districts must adopt rules to achieve and maintain the

[5] For example, SCAQMD's analysis of their 2012 Air Quality Attainment Plan showed that modeled NOx and ROG reductions of 432 and 187 tons per day, respectively, only reduced ozone levels by 9 parts per billion. Analysis of SCAQMD's Rule 1315 showed that emissions of NOx and ROG of 6,620 pounds (3.46 tons) per day and 89,180 pounds (44.59 tons) per day, respectively, contributed to 20 premature deaths per year and 89,947 school absences (South Coast Air Quality Management District 2015).

state and federal AAQS within their jurisdictions. Mobile emissions from vehicles will continue to decrease over time given evolving clean air technology requirements and the increase in use of electric vehicles.

Neither the SJVAPCD nor any other air district currently have methodologies or thresholds that would provide Lead Agencies and CEQA practitioners with a consistent, reliable, and meaningful analysis to correlate specific health impacts that may result from the proposed project's mass emissions. As noted by the SJVAPCD, it would be extremely difficult, if not impossible to quantify health impacts of criteria pollutants for various reasons, including modeling limitations, as well as where in the atmosphere air pollutants interact and form for a development as small as the proposed project. Furthermore, the SJVPCD has acknowledged that currently available modeling tools are not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts. The SJVAPCD notes, "…the Air District is simply not equipped to analyze and to what extent the criteria pollutant emissions of an individual CEQA project directly impact human health in a particular area…even for projects with relatively high levels of emissions of criteria pollutant precursor emissions."

Information on health impacts related to exposure to ozone and particulate matter emissions published by the U.S. EPA and CARB have been summarized above and discussed in the Regulatory Framework section. Health studies are used by these agencies to set the federal and state AAQS. None of the health-related information can be directly correlated to the pounds/day or tons/year of emissions estimated from a single project. For this reason, the discussion above explains in detail why a numerical analysis would not be reliable or meaningful and why health-based impacts are anticipated to be less than significant.

Mitigation Measures

MM AQ-2 A project-specific Health Risk Assessment (HRA) shall be conducted for future residential development proposed within 500 feet of the Metrolink right-of-way, pursuant to the recommendations set forth in the CARB Air Quality and Land Use Handbook. The HRA shall evaluate a project per the following SCAQMD thresholds:

- Carcinogens: Maximally Exposed Individual risk equals or exceeds 10 in one million.
- Non-Carcinogens: Emit toxic contaminants that equal or exceed 1 for the Maximally Exposed Individual.

The SCAQMD has also established non-carcinogenic risk parameters for use in HRAs. Noncarcinogenic risks are quantified by calculating a "hazard index," expressed as the ratio between the ambient pollutant concentration and its toxicity or Reference Exposure Level (REL). An REL is a concentration at or below which health effects are not likely to occur. A hazard index less of than one (1.0) means that adverse health effects are not expected. If projects are found to exceed the SCAQMD's Health Risk Assessment thresholds, mitigation shall be incorporated to reduce impacts to below SCAQMD thresholds.

Impact 4.2-4: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant.

CONSTRUCTION

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. SCAQMD Rule 1113 limits the allowable amount of VOCs from architectural coatings and solvents. Since compliance with SCAQMD Rules governing these compounds is mandatory, no construction activities or materials are proposed that would create objectionable odors adversely affecting a substantial number of people. Therefore, no significant impact would occur, and no mitigation is required.

OPERATION

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Long-term Project operations would not introduce new sources of odors and would not create objectionable odors that could adversely affect a substantial number of people. The Project does not include any uses identified by the SCAQMD as being typically associated with objectionable or nuisance odors. Waste collection areas and disposal for the Project would be covered and situated away from the property line and sensitive off-site uses. Therefore, potential odor impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation is required.

4.2.6 CUMULATIVE IMPACTS

As previously concluded above, the future development construction facilitated by the RLASCSP would not be consistent with applicable air quality plan. **MM AQ-1** is required to ensure that future development projects that are not exempt from CEQA have construction related air quality impacts analyzed and feasible mitigation incorporated as necessary to reduce potential impacts. Despite compliance with **MM AQ-1**, and applicable SCAQMD rules and regulations, construction, operational, and localized pollutant concentration emissions have the potential remain significant and unavoidable at the programmatic level due to the Project's scope, scale, and overall buildout projections.

Regarding air quality plan consistency, implementation of the Specific Plan would not exceed the population growth forecasted in the 2016 AQMP. The Specific Plan Project, which encourages transit-oriented development, infill development with access to alternative transportation, is consistent with regional policies established in the 2020 Connect SoCal RTP/SCS that promote alternative modes of transport and "livable corridors" to reduce air quality impacts from vehicle emissions. In addition, Specific Plan implementation would improve the job-housing balance in the City, which reduces vehicle miles traveled by residents to employment opportunities outside the City. The Specific Plan is consistent with the goals of the RTP/SCS to reduce vehicle miles traveled and associated air pollutant emissions. Therefore, future projects within the Specific Plan area would be consistent with the AQMP and the

Project would not result in substantial unplanned growth or unaccounted for growth in the General Plan or job growth projections used by the SCAQMD to develop the AQMP. Although the Project would be consistent with AQMP growth projections, future project construction and operational emissions are unknown at this time. Future construction and operational emissions may exceed SCAQMD thresholds, ultimately conflicting with the 2016 AQMP, which is intended to bring the air basin into attainment for all criteria pollutants. Therefore, the Project's contribution to regional pollutant concentrations would be cumulatively considerable despite the fact that the Specific Plan would be consistent with the growth forecasts utilized in the development of the AQMP. (Threshold 4.2-1)

The Project would facilitate the development of up to 700 DUs and 1,130,000 sf of non-residential uses. Future projects facilitated by the RLASCSP would likely have temporary air impacts due to construction emissions that exceed thresholds. Quantifying individual future development's air emissions from short-term, temporary construction-related activities is not possible due to project-level variability and uncertainties. Due to the size of the Focus Area, certain larger projects may have temporary air impacts due to construction that exceed thresholds. As such, the Project's contribution to cumulative impacts related to air would remain cumulatively significant.

With respect to the Specific Plan's air quality emissions and cumulative basin-wide conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the 2016 AQMP pursuant to Federal Clean Air Act mandates. As such, the Project would comply with SCAQMD Rule 403 requirements. In addition, the Specific Plan would comply with adopted 2016 AQMP emissions control measures. Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on construction projects throughout the air basin, which would include related projects.

Given the general nature of the RLASCSP and the long build out potential, it is not possible to quantify the exact reduction in emissions that would be provided by typical air quality mitigation measures. Therefore, the proposed Project may not meet the performance standard for annual emissions reductions and could result in a cumulatively considerable net increase of one or more criteria pollutants for which the project region is in nonattainment under an applicable federal or state ambient air quality standard, and this impact would be significant. (Threshold 4.2-2)

As concluded above, the Project would not 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, nor would it expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the federal Clean Air Act mandates. The analysis assumed fugitive dust controls would be used during construction, including frequent water applications. Cumulative projects would also be required to comply with SCAQMD rules and regulations. Therefore, project-related construction emissions, combined with those from other projects in the area, would not substantially deteriorate local air quality significant given compliance with the established regulatory framework would be required. (Threshold 4.2-3)

As concluded above, the Project would not generate odors. Therefore, no cumulative impact concerning odors would occur. (Threshold 4.2-4)

4.2.7 SIGNIFICANT UNAVOIDABLE IMPACTS

The Project would result in a significant and unavoidable impact related to implementation of an air quality plan and cumulatively considerable net increase of criteria pollutants.

4.2.8 REFERENCES

City of Downey. January 2005. *Vision 2025 General Plan*. Available at https://www.downeyca.org/home/showpublisheddocument/154/636977201799600000. Accessed May 15, 2021.

San Joaquin Valley Air Pollution Control District (SJVAPCD), 2015. Application for Leave to File Amicus Curiae Brief of SJVAPCD in Support of Defendant and Respondent, County of Fresno and Real Party in Interest and Respondent, Friant Ranch, L.P. April 13, 2015.

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South Coast Air Quality Management District (SCAQMD). March 2017. *2016 Air Quality Management Plan*. Available at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp. Accessed April 16, 2021.

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4.3 BIOLOGICAL RESOURCES

4.3.1 INTRODUCTION

This section describes and evaluates potential impacts to biological resources that could result from implementation of the Rancho Los Amigos South Campus Project (RLASCSP or proposed Project). Existing biological conditions at the Focus Area within the Specific Plan area (Focus Area or Project site), applicable policies, ordinances and regulations, potential environmental impacts, and mitigation measures are described.

As addressed in **Section 1: Introduction**, this PEIR section relies upon and incorporates by reference in its entirety the County of Los Angeles Rancho Los Amigos South Campus Project EIR (County Project EIR) Section 3.3: Biological Resources. The resource surveys conducted for the County Project EIR included a portion of the Focus Area and are representative of general site conditions and sensitivity throughout the South Campus. That EIR and the detailed studies therein adequately address the potentially occurring species present within the County Project area and the proposed Project's Focus Area, and applicable mitigation strategies.

4.3.2 AFFECTED ENVIRONMENTS

The Specific Plan area, inclusive of the Focus Area is located within a highly urbanized area where development has removed native vegetation communities, surficial natural soils, topography, and hydrology. The nearest natural open space is located in La Puente Hills, approximately eight miles to the northeast. The Focus Area is approximately 0.75 mile east of the confluence of the Los Angeles River and Rio Hondo and approximately 2.5 miles west of the San Gabriel River. This feature is a concrete-lined channel that contains no riparian habitat and has low habitat value to wildlife.

The 172-acre RLASCSP contains a mix of occupied businesses, landscaped areas, and vacant lots that support nonnative plant species typical of urban areas in the region. There are approximately 113 buildings and structures within the RLASCP, that are in various stages of abandonment and deterioration. The Focus Area (see **Section 2.0: Project Description**) is developed with buildings, impervious surfaces, and landscaped areas. The largest undeveloped area in the Focus Area is located in the southwest corner, which was previously used for agricultural practices for many years and now supports non-native plant species.

VEGETATION

There are no native vegetation communities in the Focus Area. Maintained landscaped areas are found associated with existing developed land uses, and there are trees of varying species, size, and condition. An inventory survey of existing trees was prepared for the County Project EIR (County Project EIR Appendix C), which identified, mapped, and assessed 598 trees. Of these 598 trees, there are 371 trees in the Focus Area. County Project EIR Appendix C lists existing trees with an identification number that corresponds to a location depicted in the Rancho Los Amigos – South Campus Tree Works Location Exhibit. Identification numbers for trees in the Focus Area include Nos. 132–152, 218–533, 552–566, and 582–595. Of these 371 trees, there are three coast live oak (Nos. 244, 245, and 385) with the most common species being the Mexican Fam Palm (*Washingtonia Robustta*), Southern Magnolia (*Magnolia Grandiflora*),

Brazilian Pepper (*Schinus Terebinthifolius*), Jacaranda (*Jacaranda Mimosifolia*), and Italian Cypress (*Cupressus Sempervirens*).

The County Project EIR Section 3.3: Biological Resources Table 3.3-1 identifies special-status plants that have recorded occurrences within 15 miles, including 10 species listed under the state or federal Endangered Species Acts. The County Project EIR notes that none were found due to the existing development and non-native vegetation within the boundaries of the County's study area. Due to overlapping boundaries and the same vegetative conditions in the Focus Area, these findings are applicable to the proposed Project.

"Special-status" species include plants and animals that are listed under the California Endangered Species Act (CESA) or Federal Endangered Species Act (FESA) that are considered sufficiently rare or sensitive under CEQA, and species protected under other regulations. Special-status species include the following:

- Species listed or proposed for listing as threatened or endangered, or are candidates for possible future listing as threatened or endangered, under CESA or FESA;
- Species that meet the definitions of rare or endangered under CEQA;
- Plants listed as rare under the California Native Plant Protection Act (NPPA) (Fish and Game Code §1900 et seq.);
- Plants considered by the CNPS) to be rare, threatened, or endangered in California (California Rare Plant Rank [CRPR] 1,2 and 4);
- Species covered under an adopted Natural Community Conservation Plan/Habitat Conservation Plan;
- California Department of Fish and Wildlife (CDFW) wildlife species of special concern;
- Wildlife fully protected in California (Fish and Game Code §3511, 4700, and 5050); and/or,
- Avian species protected by the Migratory Bird Treaty Act (MBTA).

WILDLIFE

A biological resources reconnaissance survey for the County Project EIR's was conducted on July 17, 2017. The County EIR concluded that potential resident wildlife species were observed during the site survey or are expected to occur. include species that are commonly found in urban environments. These species include rock pigeon (*Columba livia*), band-tailed pigeon (*Patagioenas fasciata*), Eurasian collared-dove (*Streptopelia decaocto*), mourning dove (*Zenaida macroura*), Anna's hummingbird (*Calypte anna*), red-tailed hawk (*Buteo jamaicensis*), California scrub-jay (*Aphelocoma californica*), American crow (*Corvus brachyrhynchos*), northern mockingbird (*Mimus polyglottos*), European starling (*Sturnus vulgaris*), house sparrow (*Passer domesticus*), house finch (*Haemorhous mexicanus*), Virginia opossum *(Didelphis virginiana*), eastern fox squirrel (*Sciurus niger*), Botta's pocket gopher (*Thomomys bottae*), house mouse (*Mus musculus*), Norway rat (*Rattus norvegicus*), black rat (*Rattus rattus*), coyote (*Canis latrans*), raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), and feral cat (*Felis catus*). Due to the developed nature of the Focus Area, the findings of the County Project EIR are applicable to the Focus Area. It is noted that birds including common urban bird species, may nest in the Focus Area, primarily within the ornamental landscaping.

The County Project EIR included a focused bat survey conducted in June 2017. The survey was conducted during the summer when bats are most active and nursing their young. Bat detectors recorded 1,444 bat passes belonging to two species: Mexican free-tailed bat and the hoary bat. This high number of bat passes corresponds to a high level of bat activity in the area, but does not indicate the exact number of individual bats as a single bat can record multiple passes. Although no bats were observed emerging from any buildings nor were there any other visible indicators of roosting such as guano, the high amount of bat activity on the adjacent site could indicate the presence of roosting bats in the area. The County Project EIR concluded that no special-status bat species were detected during the focused bat survey. No special-status animal species are expected to occur within the Focus Area.

4.3.3 REGULATORY SETTING

FEDERAL

Endangered Species Act (USC, Title 16, Sections 1531 through 1543)

FESA and subsequent amendments provide guidance for the conservation of endangered and threatened species and the ecosystems upon which they depend. In addition, the FESA defines species as threatened or endangered and provides regulatory protection for listed species. The FESA also provides a program for the conservation and recovery of threatened and endangered species as well as the conservation of designated critical habitat that U.S. Fish and Wildlife Service (USFWS) determines is required for the survival and recovery of these listed species.

FESA Section 7 requires federal agencies, in consultation with and assistance from the Secretary of the Interior or the Secretary of Commerce, as appropriate, to ensure that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of threatened or endangered species or result in the destruction or adverse modification of critical habitat for these species. The USFWS and National Marine Fisheries Service (NMFS) share responsibilities for administering the FESA. Regulations governing interagency cooperation under Section 7 are found in California Code of Regulations (CCR) Title 50, Part 402. The opinion issued at the conclusion of consultation will include a statement authorizing "take" (i.e., to harass, harm, pursue, hunt, wound, kill, etc.) that may occur incidental to an otherwise legal activity.

Section 9 lists those actions that are prohibited under the FESA. Although take of a listed species is prohibited, it is allowed when it is incidental to an otherwise legal activity. Section 9 prohibits take of listed species of fish, wildlife, and plants without special exemption. The definition of "harm" includes significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns related to breeding, feeding, or shelter. "Harass" is defined as actions that create the likelihood of injury to listed species by disrupting normal behavioral patterns related to breeding, feeding, and shelter significantly.

Section 10 provides a means whereby a nonfederal action with the potential to result in take of a listed species can be allowed under an incidental take permit. Application procedures are found at 50 Code of Federal Regulations (CFR) 13 and 17 for species under the jurisdiction of USFWS and 50 CFR 217, 220, and 222 for species under the jurisdiction of NMFS.

Migratory Bird Treaty Act (16 USC §§703 through 711)

MBTA is the domestic law that affirms, or implements, a commitment by the U.S. to four international conventions (with Canada, Mexico, Japan, and Russia) for the protection of a shared migratory bird resource. The MBTA makes it unlawful at any time, by any means, or in any manner to pursue, hunt, take, capture, or kill migratory birds. The law also applies to the removal of nests occupied by migratory birds during the breeding season. The MBTA makes it unlawful to take, pursue, molest, or disturb these species, their nests, or their eggs anywhere in the U.S.

STATE

California Endangered Species Act (California Fish and Game Code §2050 et seq.)

CESA establishes the state policy to conserve, protect, restore, and enhance threatened or endangered species and their habitats. The CESA mandates that state agencies should not approve projects that would jeopardize the continued existence of threatened or endangered species if reasonable and prudent alternatives are available that would avoid jeopardy. There are no state agency consultation procedures under the CESA. For projects that would affect a listed species under both the CESA and the FESA, compliance with the FESA would satisfy the CESA if CDFW determines that the federal incidental take authorization is "consistent" with the CESA under California Fish and Game Code §2080.1. For projects that would result in take of a species listed under the CESA only, the project operator would have to apply for a take permit under §2081(b).

California State Fish and Game Code §§Sections 3503, 3503.5, and 3513

Under the California Fish and Game Code, the project operator is not allowed to conduct activities that would result in the taking, possessing, or destroying of any birds of prey; the taking or possessing of any migratory nongame bird as designated in the federal MBTA; the taking, possessing, or needlessly destroying nest or eggs of any raptors or nongame birds protected by the MBTA; or the taking of any nongame bird pursuant to California Fish and Game Code §3800.

Native Plant Protection Act (California Fish and Game Code §§1900 through 1913)

California's NPPA requires all state agencies to use their authority to carry out programs to conserve endangered and rare native plants. The NPPA prohibits the taking of listed plants from the wild and require notification of CDFW at least 10 days in advance of any change in land use. This allows CDFW to salvage listed plant species that would otherwise be destroyed. The project operator is required to conduct botanical inventories and consult with CDFW during project planning to comply with the provisions of this act and sections of CEQA that apply to rare or endangered plants.

California Environmental Quality Act Guidelines, §15380

Although threatened and endangered species are protected by specific federal and state statutes, CEQA Guidelines §15380(b) provides that a species not listed on the federal or state list of protected species may be considered rare or endangered if the species can be shown to meet certain specified criteria. These criteria have been modeled after the definition in FESA and the California Fish and Game Code section dealing with rare or endangered plants or animals. This section was included in CEQA primarily to deal with situations in which a public agency is reviewing a project that may have a significant effect on, for example, a candidate species that has not been listed by either USFWS or CDFW. Thus, CEQA provides

an agency with the ability to protect a species from the potential impacts of a project until the respective government agencies have an opportunity to designate the species as protected, if warranted. CEQA also calls for the protection of other locally or regionally significant resources, including natural communities. Although natural communities do not at present have legal protection of any kind, CEQA calls for an assessment of whether any such resources would be affected and requires findings of significance if there would be substantial losses. Natural communities listed by CNDDB as sensitive are considered by CDFW to be significant resources and fall under the State CEQA Guidelines for addressing impacts. Local planning documents such as general plans often identify these resources as well.

LOCAL

City of Downey

City of Downey Vision 2025 General Plan: Conservation Element

The City of Downey Vision 2025 General Plan (DGP) was adopted on January 25, 2005. The DGP provides a long-range policy guide to address changes to the City. The DGP discusses tree preservation noting that the "removal of trees may have a negative impact on the quality of life in the City."[1] The following goals and policies are applicable to the proposed Project:

- **Goal 4.4**. Preserve trees wherever possible.
    - **Policy 4.4.1:** Preserve trees on private and public property.
        - **Program 4.5.1.4:** Encourage alternative modes of travel, such as walking and cycling, to vehicle use and alternative modes of employment, such as telecommuting and home-based businesses, to reduce emissions associated with vehicle use.
        - **Program 4.5.1.5:** Promote the use of alternative fuel vehicles, including clean diesel, compressed natural gas, hydrogen, that result in reduced emissions, including in instances involving City operations.
        - **Program 4.5.1.7:** Pursue means to prohibit unnecessary operation of engines.

City Of Downey Municipal Code §9502

Chapter 5 – Supplemental Regulations, §9520.04. Landscaping requirements.

Requirements. Landscaping and required planting areas shall be installed in accordance with the standards and requirements of this section for all zones. All front and street side setbacks within all zones, excluding approved walkways and driveways, shall be landscaped.

Development Regulations. Required planting areas shall be permanently maintained. As used in this section, "maintained" includes proper watering, pruning, mowing of lawns, weed abatement, removal of litter, fertilizing, and replacement of plants and other landscape materials when necessary.

- Existing mature landscaping shall be preserved to the maximum extent possible.
- Landscape material shall not be located such that at maturity the landscaping:

[1] City of Downey. Vision 2025 General Plan, Chapter 4. Conservation, Tree Preservation. 2005.

a. Interferes with safe sight distances for vehicular, bicycle, or pedestrian traffic;

b. Conflicts with overhead utility lines, overhead lights, or walkway lights; or

c. Blocks pedestrian and bicycle ways.

- All landscaping and trees shall be approved and installed prior to the issuance of a certificate of occupancy.
- Trees shall be planted in the parkway or in approved tree wells as required by the Department of Public Works. Property owners shall maintain trees and landscaping in parkways.
- Except in the R-1 and R-2 zones, the total number of trees required shall be as follows:

  a. One (1) tree for every five (5) parking spaces; and

  b. One (1) tree for every twenty (20) linear feet of street (including street side) frontage.
- Except in the R-1 and R-2 zones, the size of trees, at time of planting, shall be as required in Table 9.5.4.

Landscaping Plan. A landscaping plan showing the location of all turf, plant materials, and irrigation systems shall be required for all uses that include landscaping projects. Landscaping plans for projects within the R-1, R-2, and R-3 Zones shall be reviewed by the City Planner. In lieu of City inspections, the installer shall sign a self-certification certificate. Landscaping projects for all other zones shall be approved by the Planning Commission during Site Plan Review. Plans submitted for the issuance of a building permit or a site plan may be used in lieu of a landscaping plan provided that compliance with all of the requirements of a landscaping plan is achieved to the satisfaction of the Commission during Site Plan Review. The Commission may reject such plans if they determine that they are not consistent with the purpose of this chapter. Landscaping plans shall demonstrate a recognizable pattern or theme for the overall development through conformance with the following:

- Plant materials shall be selected for energy efficiency and drought tolerance and adaptability and relationship to the City's environment. A minimum of seventy-five (75) percent of non-turf material shall be drought resistant. All drought tolerant plant materials shall comply with the list provided by the Planning Division.
- Plant materials shall be sized and spaced to achieve immediate effect. Approved non-turf areas, such as shrub beds, shall be top-dressed with bark chip mulch mixed into the topsoil or other approved alternative. Dressing material shall be maintained within planter areas and shall not be allowed to migrate onto hard surfaces, such as sidewalks and parking lots.
- Excluding the street setbacks, turf shall be limited to no more than twenty-five (25) percent of the total landscaping area. No turf shall be permitted on slopes exceeding ten (10) percent.

All plantings other than trees shall provide a screen of not less than one and one-half (1½) feet to three (3) feet at full growth, shall not be thorny or spiked, and shall not project over the sidewalk

4.3.4 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G (2021) contains the Initial Study Checklist, which includes questions concerning biological resources. The questions presented in the Initial Study Checklist have been used as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

- 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. (Impact 4.3-1)
- 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. (Impact 4.3-2)
- 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. (Impact 4.3-3)
- Interfere substantially with the movement of any native resident, migratory fish or wildlife species, established native resident, migratory wildlife corridors, or impede the use of native wildlife nursery sites. (Impact 4.3-4)
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. (Impact 4.3-5)
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. (Impact 4.3-6)

METHODOLOGY AND ASSUMPTIONS

A literature and database review was conducted that included a review of the County EIR Section 3.3: Biological Resources, and the detailed studies therein and aerial photographs (Near Map, 2021) of the Focus Area and surrounding vicinity were evaluated against the significance criteria, as the basis for determining the level of impact related to biological resources. In addition, this analysis considers the existing regulatory framework (i.e., laws, ordinances, regulations, and standards) that avoid or reduce the potentially significant environmental impact. Where significant impacts remain despite compliance with the regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project's potentially significant environmental impacts.

4.3.5 IMPACTS AND MITIGATION MEASURES

Impact 4.3-1: Would the project have a substantial 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 of U.S. Fish and Wildlife Service?

No Impact. The Project does not propose construction of development; rather, it provides capacity for future development within the Focus Area. Should the Specific Plan Project be approved, future development would be required to meet mandatory federal and state biological resource requirements in effect at the time of development aimed at protecting biological resources. No special-status plant and animal species are associated with specific native vegetation communities and micro-habitats are found in the Focus Area due to the existing development and non-native vegetation. No special-status animal or plant species are expected to occur in the Focus Area.

Site-specific evaluation would be required upon submittal of a development permit application. In its review, the City would determine if any circumstance had changed such that a site-specific development project could have an effect on wildlife and plant species. No impact to rare, threatened, and endangered species would be expected associated future project's construction, temporary demolition of additional structures on the South Campus, or long-term operation.

Mitigation Measures

No mitigation is required.

Impact 4.3-2: 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 Wildlife or U.S. Fish and Wildlife Service?

No Impact. The Project does not propose construction of development; rather, it provides capacity for future development within the Focus Area. As previously discussed, since site-specific field surveys were not conducted for the Project, this analysis is based on programmatic sources such as the County Project EIR and DGP. The Focus Area's natural vegetation and hydrology has been removed by the existing development and previous land uses. The Focus Area consists of structures, impervious surfaces (e.g., concrete sidewalks and asphalt parking lots), landscaped areas, and areas where structures have been removed and are now vacant lots. Water flow from precipitation events is directed into an existing stormwater drain system that is connected to the City's stormwater system. As such, there would be no impacts to riparian habitat or other sensitive natural communities during future development, temporary demolition of additional structures in the Focus Area, and long-term operation of the proposed Project.

Mitigation Measures

No mitigation is required.

Impact 4.3-3: Would the project have a substantial adverse effect on state or federally protected wetlands?

No Impact. The Project does not propose construction of development; rather, it provides capacity for future development within the Focus Area. As previously discussed, since site-specific field surveys were

not conducted for the Project, this analysis is based on programmatic sources such as the County Project EIR and the DGP. No state or federally protected wetlands or other hydrological features are found on or immediately adjacent to the Specific Plan Area, including the Focus Area. The Focus Area's natural hydrology has been removed by the existing development and previous land uses. As such, there would be no direct or indirect impacts to state or federally protected wetlands during future construction of the proposed Project, temporary demolition of additional structures in the Focus Area and long-term operation of the proposed Project.

Mitigation Measures

No mitigation is required.

Impact 4.3-4: 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?

Less than Significant with Mitigation. There are no wildlife corridors or habitat connectivity between the RLASCSP, including the Focus Area and any natural areas in the region that might support the movement of native wildlife. Existing land use surrounding the Focus Area consists of residential, light industrial, and commercial development, as well as parks and recreational facilities, which have low habitat value to most wildlife. However, trees and development on the Focus Area do provide suitable nesting habitat for bird species and roosting bat sites, respectively. While there is no suitable habitat for any special-status wildlife species on the Focus Area, some of the existing trees could provide nesting habitat for native birds. Nesting birds are protected under the federal Migratory Bird Treaty Act *(16 USC* §703 et seq.) and the California Fish and Game Code (§3503 et. seq.). Federal regulations prohibit any person to "pursue, hunt, take, capture, kill, attempt to take, capture, or kill, possess, offer for sale, sell, offer to barter, barter, offer to purchase, [or] purchase" any migratory bird, including parts of birds, as well as eggs and nests. The California Fish and Game Code §§3503, 3503.5 and 3512 also prohibit the take of birds and active nests. The County Project EIR concluded that there is a high amount of bat activity in the area, suggesting the presence of roosting bats. As with nesting birds, roosting bats are protected under the Migratory Bird Treaty Act and California Fish and Game Code. Applications for future development facilitated by the Project, where it has been determined that there is a potential for native bird and bat impacts, applicants shall be required to comply with the mitigation framework included in **Mitigation Measure (MM) BIO-1** and **MM BIO-2**. **MM BIO-1** requires a preconstruction survey for nesting birds with procedures should nesting birds be discovered. **MM BIO-1-2** requires require site-specific surveys to be conducted for future development permit applications in order to verify the presence of roosting bats, determine the extent of any potential impacts, and provide mitigation. Implementation of mitigation measures would reduce potential impacts to a less than significant level.

Mitigation Measures

MM BIO-1 Applications for future development facilitated by the Specific Plan Project, where the City has determined a potential for impacts to a nesting birds, shall be required to comply with the following mitigation framework:

a. Future project-related construction, demolition, and tree maintenance activities should occur outside of general avian breeding season (February 1 to through

August 31) to the extent feasible. If project-related construction, demolition, and tree maintenance activities cannot occur outside general avian breeding season, a pre-activity nesting bird survey shall be conducted prior to the onset of the aforementioned activities, within a maximum of 14 days prior to commencement. The survey shall be conducted by a qualified biologist. The survey shall be conducted within all suitable nesting habitat located within the area of activity, which includes a 250-foot survey buffer around the activity site to account for all potentially nesting birds on and in the immediate vicinity. If no nesting birds are found, the project-related activities may commence without potential impacts to nesting birds.

b. If any active nests or sign of nesting activity (e.g., carrying nesting material or food) is observed during the pre-activity survey, a suitable buffer shall be established around the nest as determined by a qualified biologist to ensure no direct or indirect impacts occur to the nest. Many avian species that would nest in the area are accustomed to urban environments and human activities; therefore, the buffer distance shall be determined based on the location of the nest as well as the species tolerance to human presence. A qualified biologist shall monitor the nesting activity after the buffer is delineated and during typical project-related noises to verify that the buffer is adequately placed and to confirm that breeding is not compromised by the project. Any excessive noise or lighting that could potentially impact the nest shall be directed away from the nest to the greatest extent feasible. The buffer shall remain in place for the duration the nest is active as determined by a qualified biologist.

MM BIO-2 Applications for future development facilitated by the Specific Plan Project, where the City has determined a potential for impacts to bats, shall be required to comply with the following mitigation framework:

a. Focused roosting surveys shall be conducted throughout the Focus Area by a qualified biologist to determine if bat species are presently using the on-site structures for roosting. The survey shall focus on the buildings with the highest potential of supporting roosting bats — those with large enough opening for bats to enter and exit — and it will be conducted at dusk when bats would be exiting their roosts. Exit counts shall be conducted so that no visible light shines on the roost area or openings. Noise and other disturbance must be minimized or eliminated, so that bats will emerge normally from roosts.

b. If there is evidence of established maternity bat roosts in the Focus Area, the biologist shall recommend exclusionary devices or removal efforts, as necessary based on specific species and situational criteria. Exclusionary devices shall not be installed at the entrance to the roosts between April and August, during which time the immature bats are unable to leave the roost. Exclusion devices, if needed, will be installed in late August, after maternity season.

c. If it is determined by the bat biologist that there is a substantial population of bats using the structures in the Focus Area, the construction of bat houses on-site may be recommended by the qualified biologist and in consultation with CDFW. The houses would be constructed prior to any exclusionary actions and would be based upon

CDFW-approved designs. If determined necessary by CDFW, post-construction monitoring shall occur seasonally (four times/year) for up to three years, or until the mitigation can be considered successful. Success would be defined as the mitigation roost or roosts being occupied by comparable numbers of bats belonging to the same species as were present pre-construction.

Impact 4.3-5: Would the project conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The City does not have a tree preservation ordinance. However, the General Plan encourages the preservation of trees on public and private property. The 62.5-acre Focus Area has a net developable area of 47.8 acres assuming a 7 percent allowance for landscaping. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including DMC §9520.04, Landscaping Requirements. Additionally, the removal of trees or vegetation for the purpose of future development's construction staging is not anticipated. Therefore, future development facilitated by the proposed Project would not impact or conflict with the provisions of a local policies or ordinances. Therefore, no impact would occur.

Mitigation Measures

No mitigation is required.

Impact 4.3-6: Would the project conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Focus Area is not identified in a habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. The refore, future development facilitated by the proposed Project would not impact or conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan, therefore there would be no conflicts and no impact attributable to a conflict.

Mitigation Measures

No mitigation is required.

4.3.6 CUMULATIVE IMPACTS

When evaluating cumulative biological resource impacts, several factors must be considered. As previously stated, the Project does not propose development but would facilitate future development with a maximum buildout capacity of 700 DUs and 1,130,000 SF of non-residential land uses within the Focus Area. The combination of the proposed Project together with related present and reasonably foreseeable future projects is provided in Table 3-1: Cumulative Projects List.

Present and reasonably foreseeable future projects are required to implement measures, as set forth in their respective CEQA documents, consistent with federal, state, and local regulations to avoid adverse

effects to existing biological resources or to mitigate for significant impacts to these resources. The types of measures required for projects impacting protected habitat, species, and regulated resources can include avoidance, project design features, regulatory approvals, best management practices, and mitigation measures. The proposed Project would not cause a significant impact to biological resources. The Focus Area is in an urban setting where there would be no change to biological resources. The Focus Area does not contain riparian habitat or any other water resources. Additionally, the site does not contain waters, including wetland waters, that are subject to federal jurisdiction under Section 404 of the Clean Water Act. The site is not located within a designated habitat area, which may support species and habitats that are sensitive and rare within the region or may function as a migration corridor for wildlife. Therefore, the Project would not contribute to a cumulatively considerable impact on biological resources including sensitive species, protected habitat, or wetland resources.

4.3.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable biological resource impacts have been identified.

4.3.8 REFERENCES

City of Downey. January 2005. *Vision 2025 General Plan*. Available at https://www.downeyca.org/home/showpublisheddocument/154/636977201799600000. Accessed May 15, 2021.

ESA. June 2020. *Rancho Los Amigos South Campus Project Final EIR, SCH No. 2017081017*.

City of Downey. 2020. *Downey Municipal Code*. Available at http://qcode.us/codes/downey/?topic=ix&frames=on. Accessed May 21, 2021.

4.4 CULTURAL RESOURCES

4.4.1 INTRODUCTION

This section of the PEIR provides contextual background on the area's prehistoric and historical setting and existing cultural resources. This section analyzes potential impacts on cultural resources resulting from implementation of the Rancho Los Amigos South Campus Specific Plan (RLASCSP) and identifies mitigation measures to reduce or avoid potential impacts.

State CEQA Guidelines §16064.5 refers to "historical resources" as being a resource listed in or eligible for listing as a significant resource in state or local registers of historical resources, or by determination of a lead agency which is supported by substantial evidence. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to California Public Resources Code [PRC] §5020.1(k), or identified in an historical resources survey (meeting the criteria in PRC §5024.1(g) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC §5020.1(j) or §5024.1.

Tribal cultural resources as defined in PRC §21074 (sites, features, places, cultural landscapes, sacred places, and objectives with cultural value to a California Native American tribe) are addressed in **Section 4.14, Tribal Cultural Resources**, of this PEIR. With the exception of paleontological resources, the topic of Geology and Soils was determined to be less than significant and was therefore not evaluated in this PEIR; see **Section 7.0: Effects Found Not To Be Significant**. Therefore, paleontological resources are addressed in this section of the PEIR.

The data and analysis presented below is based on information from the Downey General Plan (DGP), DGP EIR, and County of Los Angeles Rancho Los Amigos South Campus Project EIR (County Project EIR). Cultural resource impact analysis for the County Project was based on *Rancho Los Amigos Historic District Analysis Report* (County Project EIR, Appendix D-1) and the *Rancho Los Amigos South Campus Project: Archaeological Resources Assessment Report* which include confidential files on record with the County. The cultural evaluations were conducted in compliance with the California Public Resources Code (PRC) §5024.1 to recognize archeological or historical resources in an area of potential effect (APE) and analyzed the County project site's impact area, inclusive of the Focus Area analyzed under this PEIR. The resource surveys conducted for the County Project EIR included a portion of the Focus Area and is representative of general site conditions and sensitivity throughout the South Campus.

CULTURAL RESOURCES TERMINOLOGY AND CONCEPTS

Key terms and concepts used in this section to describe and assess the potential cultural resource impacts are defined below:

- **Archeological Site.** A site is defined by the National Register of Historic Places (National Register) as the place or places where the remnants of a past culture survive in a physical context that allows for the interpretation of these remains. Archeological remains usually take the form of artifacts (e.g., fragments of tools, vestiges of utilitarian or non-utilitarian objects), features (e.g., remnants of walls, cooking hearths, or midden deposits), and ecological evidence (e.g., pollen remaining from plants that were in the area when the activates occurred). Prehistoric

archaeological sites generally represent the material remains of Native American groups and their activities dating to the period before European contact. In some cases, prehistoric sites may contain evidence of trade contact with Europeans. Ethnohistoric archaeological sites are defined as Native American settlements occupied after the arrival of European settlers in California. Historic archaeological sites reflect the activities of non-native populations during the Historic period.

- **Artifact.** An object that has been made, modified, or used by a human being.
- **Cultural Resource.** A cultural resource is a location of human activity, occupation, or use identifiable through field inventory, historical documentation, or oral evidence. Cultural resources include archaeological resources and built environment resources (sometimes known as historic architectural resources), and may include sites, structures, buildings, objects, artifacts, works of art, architecture, and natural features that were important in past human events. They may consist of physical remains or areas where significant human events occurred, even though evidence of the events no longer remains. Cultural resources also include places that are of traditional, cultural, or religious importance to social or cultural groups.
- **Cultural resources study area (or study area).** All areas of potential permanent and temporary impacts for a reasonable worst-case development within a project site and off-site impact areas, including a fifteen-foot buffer around construction areas.
- **Ecofact.** An object found at an archaeological site that has an archaeological significance but has not been technologically altered, such as seeds, pollens, or shells.
- **Ethnographic**. Relating to the study of human cultures. "Ethnographic resources" represent the heritage resource of an ethnic or cultural group, such as Native Americans or African, European, Latino, or Asian immigrants. They include traditional resource-collecting areas, ceremonial sites, value-imbued landscape features, cemeteries, shrines, or ethnic neighborhoods.
- **Historic Period.** The period that begins with the arrival of the first non-native population and thus varies by area.
- **Historical Resource.** This term is used for the purposes of CEQA and is defined in the State CEQA Guidelines (14 California Code of Regulations [CCR] §15064.5) as: (1) a resource listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) a resource included in a local register of historical resources, as defined in PRC §5020.1(k) or identified as significant in a historical resource survey meeting the requirements which a lead agency determines to by historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Historical resources may also include Tribal Cultural Resources including sites, features, places, cultural landscapes, sacred places, objects, and/or archeological resources with value to a California Native American Tribe per PRC §21074.
- **Isolate**. An isolated artifact or small group of artifacts that appear to reflect a single event, loci, or activity. Isolates typically lack identifiable context and thus have little interpretative or research

value. Isolates are not considered to be significant under CEQA and do not require avoidance mitigation (CEQA Statute §21083.2 and State CEQA Guidelines §15064.5). All isolates located during the field effort, however, are recorded and the data are transmitted to the appropriate California Historical Resources Information System (CHRIS) Information Center.

- **Native American Sacred Site.** An area that has been, or continues to be, of religious significance to Native American peoples, such as an area where religious ceremonies are practiced or an area that is central to their origins as a people.
- **Prehistoric Period.** The era prior to 1772. The later part of the prehistoric period (post-1542) is also referring to as the protohistoric period in some areas, which marks a transitional period during which native populations began to be influenced by European presence resulting in gradual changes to their lifeways.
- **Tribal Cultural Resource.** This term refers to a site, feature, place, cultural landscape, sacred place, object, or archaeological resource with cultural value to a California Native American tribe that is listed or eligible for listing in national, California, or local registers. A lead agency also has the discretion to determine that a resource is a Tribal Cultural Resource if the determination is supported by substantial evidence.
- **Unique Archeological Resource**. This term is used for the purposes of CEQA and is defined in Public Resources Code §21083.2(g) as an archaeological artifact, object, or site, about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it either contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information; has a special and particular quality such as being the oldest of its type or the best available examples of its type; or, is directly associated with a scientifically recognized important prehistoric or historic event or person.
- **Paleontological Resource.** Paleontological resources are the fossilized remains or traces of muti-cellular invertebrate and vertebrate animals and multi-cellular plants. Fossil remains, such as bones, teeth, and shells are found in geologic deposits.

4.4.2 AFFECTED ENVIRONMENT

NATURAL SETTING

The Specific Plan area is located within the Los Angeles – Santa Ana Coastal Plain, which is generally bordered by Cahuenga Peak to the north, Topanga Canyon to the northwest, Aliso Creek to the southeast, and the Pacific coastline to the south. The Specific Plan area is located on the alluvial plain between the Los Angeles and San Gabriel rivers, and is approximately 0.75 mile east of the confluence of the Los Angeles River and Rio Hondo and approximately 2.5 miles west of the San Gabriel River. Historically, the Rio Hondo flowed immediately northwest of the Specific Plan area.

Under existing conditions, the Focus Area consists of buildings/structures, impervious surfaces (e.g., concrete sidewalks and asphalt parking lots), landscaping, and previously disturbed undeveloped areas within an urbanized area of the City. There are no natural water features or native vegetation communities in the Focus Area.

PREHISTORIC SETTING

The chronology of Southern California is typically divided into three general time periods: the Early Holocene (9,600 B.C. to 5,600 B.C.), the Middle Holocene (5,600 B.C. to 1,650 B.C.), and the Late Holocene (1,650 B.C. to A.D. 1769). This chronology is manifested in the archaeological record by particular artifacts and burial practices that indicate specific technologies, economic systems, trade networks, and other aspects of culture.

While it is not certain when humans first came to California, their presence in Southern California by about 9,600 B.C. has been well documented. At Daisy Cave, on San Miguel Island, cultural remains have been radiocarbon dated to between 9,150 and 9,000 B.C. During the Early Holocene (9,600 B.C. to 5,600 B.C.), the climate of Southern California became warmer and more arid and the human populations, who were represented by small hunter-gathers until this point and resided mainly in coastal or inland desert areas, began exploiting a wider range of plant and animal resources.

During the Late Holocene (1,650 B.C. to A.D. 1769), many aspects of Millingstone culture persisted, but a number of socioeconomic changes occurred. The native populations of Southern California were becoming less mobile and populations began to gather in small sedentary villages with satellite resource-gathering camps. Increasing population size necessitated the intensified use of existing terrestrial and marine resources. Evidence indicates that the overexploitation of larger, high-ranked food resources may have led to a shift in subsistence, towards a focus on acquiring greater amounts of smaller resources, such as shellfish and small-seeded plants. Between about A.D. 800 and A.D. 1350, there was an episode of sustained drought, known as the Medieval Climatic Anomaly. While this climatic event did not appear to reduce the human population, it did lead to a change in subsistence strategies in order to deal with the substantial stress on resources.

Given the increasing sedentism and growing populations during the Late Holocene, territorial conscription and competition became acute. Primary settlements or village sites were typically established in areas with available freshwater, and where two or more ecological zones intersected. This strategic placement of living space provided a degree of security in that when subsistence resources associated with one ecological zone failed, the resources of another could be exploited. Villages typically claimed and carefully defended fixed territories that may have averaged 30 square miles encompassing a variety of ecological zones that could be exploited for subsistence resources.

The Late Holocene marks a period in which specialization in labor emerged, trading networks became an increasingly important means by which both utilitarian and non-utilitarian materials were acquired, and travel routes were extended. Trade during this period reached its zenith as asphaltum (tar), seashells, and steatite were traded from Catalina Island (Pimu or Pimugna) and coastal Southern California to the Great Basin. Major technological changes appeared as well, particularly with the advent of the bow and arrow sometime after A.D. 500, which largely replaced the use of the dart and atlatl.

HISTORIC SETTING

Spanish Period (1769–1821)

Although Spanish explorers made brief visits to the region in 1542 and 1602, sustained European exploration of Southern California began in 1769, when Gaspar de Portolá and a small Spanish contingent began their exploratory journey along the California coast from San Diego to Monterey. This was followed

in 1776 by the expedition of Father Francisco Garcés. In the late 18th century, the Spanish began establishing missions in California and forcibly relocating and converting native peoples. In 1771, Father Junipero Serra founded the Mission San Gabriel Arcángel, located approximately 11 miles north of the Specific Plan area. Disease and hard labor took a toll on the native population in California; by 1900, the Native Californian population had declined by as much as 90 percent. In addition, native economies were disrupted, trade routes were interrupted, and native ways of life were significantly altered.

In an effort to promote Spanish settlement of Alta California, Spain granted several large land concessions from 1784 to 1821. At this time, unless certain requirements were met, Spain retained title to the land.

Mexican Period (1821–1846)

The Mexican Period began when Mexico won its independence from Spain in 1821. Mexico continued to promote settlement of California with the issuance of land grants. In 1833, Mexico began the process of secularizing the missions, reclaiming the majority of mission lands and redistributing them as land grants. According to the terms of the Secularization Law of 1833 and Regulations of 1834, at least a portion of the lands would be returned to the Native populations, but this did not always occur.

Many ranchos continued to be used for cattle grazing by settlers during the Mexican Period. Hides and tallow from cattle became a major export for Californios, many of whom became wealthy and prominent members of society. The Californios led generally easy lives, leaving the hard work to vaqueros and Indian laborers.

American Period (1846–present)

In 1846, the Mexican-American War broke out. Mexican forces were eventually defeated in 1847 and Mexico ceded California to the United States as part of the Treaty of Guadalupe Hildalgo in 1848. California officially became one of the United States in 1850. While the treaty recognized right of Mexican citizens to retain ownership of land granted to them by Spanish or Mexican authorities, the claimant was required to prove their right to the land before a patent was given.

The process was lengthy and generally resulted in the claimant losing at least a portion of their land to attorney's fees and other costs associated with proving ownership. When the discovery of gold in northern California was announced in 1848, a huge influx of people from other parts of North America flooded into California. The increased population provided an additional outlet for the Californios' cattle. As demand increased, the price of beef skyrocketed and Californios reaped the benefits. However, a devastating flood in 1861, followed by droughts in 1862 and 1864, led to a rapid decline of the cattle industry; over 70 percent of cattle perished during these droughts. This event, coupled with the burden of proving ownership of their lands, caused many Californios to lose their lands during this period. Former ranchos were subsequently subdivided and sold for agriculture and residential settlement.

SPECIFIC PLAN SITE SETTING

The Specific Plan area was once part of Spanish-era 300,000-acre Rancho Los Nietos awarded to José Manuel Nieto in 1784. Nieto died in 1804, leaving the property to his four children. In 1834, Nieto's heirs divided Rancho Los Nietos into six smaller properties, resulting in the formation of Rancho Santa Gertrudes, within which the Focus Area is located. Rancho Santa Gertrudes was awarded to the widow of Nieto's son Antonio, Josefa Cota Nieto, who then sold it to an Anglo named Lemuel Carpenter that same year. Using his land as collateral, Carpenter drifted deep into debt in an attempt to maintain his lavish

lifestyle. In 1859, Rancho Santa Gertrudes was auctioned to repay Carpenter's creditors and purchased by John Gately Downey and James McFarland. Both McFarland and Downey would play a vital role in Los Angeles' health care industry. In 1855, Downey and Abel Stearns, another of Los Angeles' wealthy landowners and Anglo pioneers, helped establish the City's first hospital with the aid of the Sisters of Charity of St. Vincent de Paul. Downey would go on to become the first elected governor of California in 1860. The purchase of Rancho Santa Gertrudes in 1859 began Downey's foray into the soon-to-be booming real estate market. The City of Downey began to take shape as the railroad arrived in 1874, constructing a station in the Santa Gertrudes area.

In 1887, the Los Angeles County Board of Supervisors purchased approximately 124 acres of land near the community of Downey and established the Los Angeles County Poor Farm (Poor Farm), a facility that provided work and medical care for the indigent (known at that time as "inmates"). In 1888, architectural firm Kysor, Morgan, and Walls designed the site plan and most of the original core of the Poor Farm. The earliest facilities included an Administration Building, North Ward, and South Ward, as well as a water well, windmill, and barn. The North Ward was originally intended for female patients but was soon reassigned to indigent men whose numbers were steadily increasing. The Poor Farm's agricultural lands included orchards, vineyards, and a poultry yard intended to keep the inmates active. In addition to providing activities for the inmates, the agricultural fields allowed for the potential of self-sustainability, which would dramatically reduce the economic burden caused by the indigent upon the county.

By 1900, the Poor Farm's agricultural programs were beginning to turn a significant profit, prompting the County Board of Supervisors to reevaluate the institution's management structure, separating the responsibilities of the superintendent and chief physician into two distinct positions. During the early 20th century, the property struggled with its identity as it experienced changes leading it in the direction of becoming a long-term healthcare facility. Various structures were added to the Poor Farm, as needed, including, a windmill, barn, and aviary. Other improvements included a laundry and water pumping plant, electric lighting, and a blacksmith shop.

Research suggests that the Poor Farm's transition to Rancho Los Amigos was not formally planned; rather, development occurred over time in response to specific needs. Under the leadership of Superintendent Charles Manning (1911-1915) the Poor Farm experienced significant growth adding a new dining room and kitchen, hospital wards, water tower, and horse stable, in 1913. By 1915, the population of the Poor Farm included 500 patients and 45 staff. During World War I, the Poor Farm transitioned away from an agricultural facility to more of an infirmary. Overcrowding in the County Hospital, which was established in 1858 by the Sisters of Charity in downtown Los Angeles, was forcefully converting the property into a healthcare facility by relocating patients with minor illnesses to the County Farm. By this time, William Ruddy Harriman had taken over as the Poor Farm's superintendent.

Harriman would become the institution's longest-tenured superintendent, overseeing nearly 40 years of improvements resulting in its transition from a poor farm into a long-term healthcare facility. By 1925, the Poor Farm facilities included a research department, morgue, pharmacy, dental department, psychopathic wards, and physical therapy department.

During Harriman's tenure, the administrative center shifted from the area around the intersection of Erickson Avenue at Consuelo Street to a new Administration Building built in 1926 on the south side of Consuelo Street: LACO No. 1100. In 1929, the original Administration Building, built in 1887-88, was

demolished and a large 51-foot-long fish pond installed in its place (between the existing Auditorium [LACO No. 1261], North Ward [demolished] and South Ward [demolished]). The fish pond and Moreton Bay Fig Tree were prominent landscape features until the fish pond was backfilled (sometime prior to 1938 based on a review of historic aerial photographs); the Moreton Bay Fig Tree is still extant.

In the early years of the Poor Farm's existence, when inmates died, they were buried in a cemetery at the southwest corner of the property. Approximately 100 individuals were interred in the cemetery grounds from 1888 to 1914. In 1914, a flood devastated the Poor Farm and a number of pine coffins surfaced. As a result, the deceased were no longer buried in the cemetery but were cremated instead. In 1946, the County abandoned the cemetery, and the remains were exhumed and cremated. The Poor Farm's cemetery was located at the former American Legion site in the southwest portion of the Focus Area.

During the Great Depression, the patient population doubled, as upper to middle-class individuals became destitute. By the 1930s, there was an increase in disabled patients that were confined to wheelchairs. In 1932, the name of the facility was changed from the Los Angeles County Poor Farm to Rancho Los Amigos in recognition of the increasing medical mission of the facility. Beginning with the construction of a new patient ward in 1930 (Harriman Building, Rancho Los Amigos North Campus), the long-term healthcare facility began to spread north of Imperial Highway. While construction at Rancho Los Amigos was focused on its growing North Campus, the old farm had experienced very little development as far as physical construction of new buildings was concerned.

Expansion of the Rancho Los Amigos North Campus continued after World War II, with the addition of multiple patient wards to house patients associated with new programs that included treatment of paralysis and polio. By 1951, Rancho Los Amigos had fully developed into a long-term healthcare facility, providing geriatric, medical and nursing care, treatment for those suffering from chronic illness, and care for patients recovering from medical or surgical conditions. The County continued to focus on development of the new North Campus, while selling off former agricultural fields surrounding the facility. In 1952, the large fields east of the Poor Farm were subdivided for residential development. In 1957, the County officially reported the discontinuation of all agricultural activities.

Beginning in 1957, the mental wards were phased out and rehabilitation programs accelerated throughout the 1960s. In 1969, Rancho Los Amigos became formally affiliated with the University of Southern California's School of Medicine with programs focused on rehabilitation and physical therapy. As the focused shifted from treatment of the chronically ill to rehabilitation, there was a need to upgrade the facilities to accommodate the severely disabled. However, the 1971 Sylmar Earthquake and deterioration of funding sources halted any plans to modernize the campus. In the 1980s, the facility became a Regional Spinal Injury Center, and in 1984 the name was changed to Rancho Los Amigos Medical Center. The Administration Building (LACO No. 1100) was restored in 1980 and is currently occupied by the Los Angeles County Sheriff Department.

As the focus shifted to newer facilities on the North Campus, many buildings on the South Campus were converted to offices and other non-medical uses, and by the early 1990s most of the buildings on the South Campus had been abandoned or were used solely for storage. Many buildings have been boarded up since 1991 and are not readily accessible to the public. There are approximately 113 buildings and structures within the South Campus that are in various stages of abandonment and deterioration. Several

buildings have been damaged by recent fires of suspicious origin, prompting the County to install chain-link fencing, increase security patrols, and add security lighting.

Historic Resources

The South Campus has been previously identified as a part of the Rancho Los Amigos Historic District (Historic District), and contains specific buildings that have been previously identified as individually eligible for listing in the National Register. Records searches through the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) identify the Historic District as Resource P-19-189330. The Historic District includes facilities related to the Poor Farm established in 1888 and renamed the Los Angeles County Farm in 1915 and Rancho Los Amigos in 1932. Two historic architectural resources (P-19-186110 [Union Pacific Railroad] and P-19-189330 [Rancho Los Amigos Historic District]) have been previously recorded within a 0.25-mile radius of the Focus Area.

Resource P-19-186110 was originally recorded in 1999 and consists of a standard gauge railroad (with associated features including railroad stations, sidings, spurs, and railyards) that was part of the development of the early transcontinental railroad system in the last three decades of the nineteenth century. The railroad is composed of smaller lines, such as the Pacific Electric, the Los Angeles and San Pedro Railroad, and the Los Angeles and Salt Lake Railroad, which were absorbed by the Southern Pacific in the 1880s. In the 1990s, the Union Pacific Railroad acquired the holdings of the Southern Pacific. This resource was previously recommended eligible for the National Register under Criterion A for its association with the development of Los Angeles as a major business center and under Criterion B for its association with important historical figures, including the Big Four (Mark Hopkins, Collis P. Huntington, Leland Stanford, and Charles Crocker). This resource is located in the southwestern portion of the Focus Area and is the proposed site of the Metro West Santa Ana Branch Corridor project (which is not a part of the proposed Project).

Resource P-19-189330 is the Historic District. The Historic District is located within the Focus Area and includes facilities related to the County of Los Angeles Poor Farm and Rancho Los Amigos. The Historic District was originally recorded in 1995 by Historic Resources Group. At that time, the Historic District was determined eligible for listing in the National Register under Criterion A by the Federal Emergency Management Agency (FEMA) through consensus with the California State Historic Preservation Officer (SHPO) and was listed in the California Register of Historical Resources (California Register) under Criterion 1 for its association with the early health care of the County's indigent population and later treatment of patients with chronic illnesses or mental disorders. The Historic District was resurveyed in 2004 by Post/Hazeltine Associates and recommended ineligible due to a lack of integrity. It was resurveyed again in 2007-2011 by Sapphos Environmental, Inc., who concurred with the original eligibility determination and identified 68 contributors within the Historic District. The Historic District is within the Focus Area and would be impacted by future development facilitated by the proposed Project.

As part of the County Project EIR, a historic resources survey update of the South Campus was conducted from June 19, 2017 to June 23, 2017 to account for changed circumstances or further documentation. The survey update documented the current conditions of all existing buildings, structures, and features and documenting the overall landscape through digital photography and hand-written notes. The intensive level pedestrian survey documented 109 buildings, structures, and features. Out of the 109 buildings structures, and features surveyed, 61 were identified as contributors and 48 were identified as non-

contributors. Within the City's RLASCSP area, there are 27 Historic District contributor buildings and 24 Historic District non-contributors.

Within the RLASCSP area, there are five buildings and structures that were identified as eligible for individual listing: the Administration Building (LACO No. 1100); Casa Consuelo (LACO No. 1283); the grouping of the Power Plant (LACO No. 1300), Water Tower (1301), and the Shop, Laundry and Ice Plant (LACO No. 1302). With the exception of Casa Consuelo, the buildings and structures are within the Focus Area. Refer to the *Rancho Los Amigos Historic District Analysis Report* (Appendix D-1 of the County Project EIR) for a detailed description of the Historic District, contributors, and individually eligible buildings, as well as the full eligibility re-evaluation.

The approved County Project assumes the demolition of 57 contributing and 46 non-contributing structures; see County Project EIR Table 3.4-3. Individually eligible buildings would be retained as part of the County Project. Accordingly, the County Project would remove 94 percent of the Historic District's contributing structures. Removal of the majority of the Historic District's contributors would materially alter the Historic District in an adverse manner, resulting in a loss of all seven aspects of integrity (location, design, setting, materials, workmanship, feeling, and association), and the physical characteristics that allow the Historic District to convey its historical significance (i.e., the buildings, structures, features present during its period of significance) would, with few exceptions, no longer be extant. The County Project EIR determined that after project completion, the District would no longer convey its historical significance and it would no longer be eligible for listing in the National Register and would no longer be eligible for the California Register. The County Project EIR identified this change as a significant unavoidable impact.

Paleontological Resources

The County Project EIR noted that the surface of the South Campus is covered with undivided Young Alluvium (Qya). These sediments consist of poorly consolidated, poorly sorted floodplain deposits of soft clay, silt, ad loose to moderately dense sand and silty sand that date from the Holocene to late Pleistocene period. At the surface, these sediments are relatively recent in age and are not old enough to contain fossil remains. However, these sediments increase in age with depth, such that while the surficial sediments are too young to preserve fossils, the underlying sediments may exceed 5,000 years in age (early Holocene or older) and therefore may preserve fossil resources.

Prior geotechnical studies referenced in the County Project EIR note the transition between loose sands (which may correlate with younger alluvium) and medium-dense to dense sandy silts (which may correlate with older alluvium) occurring as shallow as 5 to 10 feet below ground surface. Alluvial sediments that date to the early Holocene or beyond have a rich fossil history in Southern California. The most common fossils include the bones of mammoth, bison, horse, lion, cheetah, wolf, camel, antelope, peccary, mastodon, capybara, and giant ground sloth, as well as small animals such as rodents and lizards.

The County Project EIR notes that a database search was conducted by the Los Angeles County Museum in 2017. The purpose of the database search was to: (1) determine whether any previously recorded fossil localities occur at the South Campus and assess the potential for disturbance of these localities during construction, and (2) identify fossil localities in the vicinity of the site from similar deposits that underlie the area to evaluate paleontological sensitivity. The database search returned no known localities at the

South Campus. Vertebrate fossil localities are noted in Los Angeles County from sedimentary deposits similar to those present at similar depths as the South Campus.

The County Project EIR concluded that surficial sediments are too young to preserve fossil resources, but deeper units have the potential to preserve significant fossil resources. The area is considered to have low-to-high paleontological sensitivity, increasing with depth.

4.4.3 REGULATORY SETTING

FEDERAL

National Historic Preservation Act of 1966 (NHPA)

Pursuant to the National Historic Preservation Act of 1966 (NHPA), the federal government, acting through the U.S. Department of the Interior's National Park Service, maintains an inventory of properties and structures that have been determined to meet certain criteria as significant historic resources commonly referred to as the National Register of Historic Places. Eligibility for the National Register is determined by the U.S. Department of the Interior in a formal review process in which a resource is proposed for listing

Title 36 CFR §60.4 provide the criteria for evaluation of National Register eligibility. The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and:

- Criterion A: Associated with events that have made a significant contribution to the broad patterns of our history
- Criterion B: Associated with the lives of persons significant in our past
- Criterion C: Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values, represent a significant and distinguishable entity whose components may lack individual distinction
- Criterion D: Have yielded, or may be likely to yield, information important in prehistory or history

Establishing National Register eligibility also depends on integrity of location, design, setting, materials, workmanship, feeling, and association. Sites that meet one or more National Register eligibility criteria, but do not retain integrity are not eligible for the National Register. Guidance regarding "integrity of location, design, setting materials, workmanship feeling and association is provided by National Register Bulletin 15 (National Register, 2002).

Section 106 of the NHPA requires federal agencies to consider the effects of projects they carry out, approve, or fund on historic properties. For purposes of Section 106 of the NHPA, any property listed on or deemed eligible for listing on the National Register is considered historic. While ordinarily the NHPA does not apply to projects sponsored by private parties on private land, Section 106 of the NHPA may apply if the project is on federal land, is using federal money, or requires a federal permit (e.g., a Section 404 permit under the Clean Water Act from the U.S. Army Corps of Engineers [USACE]). Under Section 106, a historic property is a prehistoric or historic district, site, building, structure, or object included in or eligible for inclusion in the National Register. The term also includes properties of traditional religious and

cultural importance to an Indian tribe so long as that property also meets the criteria for listing in the National Register.

An undertaking would have adverse effect if it may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. If the undertaking is a type of activity that does not have the potential to cause effects on historic properties, assuming such historic properties were present, there is no further obligation under Section 106 (Title 36 CFR §800.3).

STATE

California Environmental Quality Act (CEQA)

California public agencies must consider the effects of their actions on both "historical resources" and "unique archaeological resources." Pursuant to PRC §21084.1, a "project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." Section 21083.2 additionally requires agencies to determine whether proposed projects would have effects on "unique archaeological resources."

"Historical resource" is a term with a defined statutory meaning. Under the State CEQA Guidelines §15064.5 (a) "historical resource" includes the following:

- A resource listed in or determined to be eligible by the State Historical Resources Commission (SHRC), for listing in the California Register (PRC §5024.1, Title 14 CCR, Section 4850 et seq.).
- A resource included in a local register of historical resources, as defined in §5020.1(k) of the PRC or identified as significant in an historical resource survey meeting the requirements §5024.1(g) of the PRC, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register (PRC §5024.1, Title 14 CCR, Section 4852) including the following:
    A. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
    B. Is associated with lives of persons important in our past;
    C. 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; or
    D. Has yielded, or may be likely to yield, information important in prehistory or history.

CEQA addresses significant impacts to historical resources. "A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (CEQA Guidelines §15064.5(b)(1)).

CEQA also requires agencies to consider whether projects will affect "unique archaeological resources." PRC §21083.2(g), states that "'unique archaeological resources' means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.

2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.

3) Is directly associated with a scientifically recognized, important prehistoric or historic event or person."

The CEQA threshold of significance for a significant impact to paleontological resources is reached when a project is determined to "directly or indirectly destroy a significant paleontological resource or unique geologic feature." In general, for projects that are underlain by paleontologically sensitive geologic units, the greater the amount of ground disturbance, the higher the potential for significant impacts to paleontological resources. For projects that are directly underlain by geologic units with no paleontological sensitivity, there is no potential for impacts on paleontological resources unless sensitive geologic units which underlie the non-sensitive unit are also affected.

California Register of Historical Resources

The California Register of Historical Resources (California Register), created in 1992 and implemented in 1998, is "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC §5024.1). Certain properties, including those listed in or formally determined eligible for listing in the National Register and California Historical Landmarks (CHL) numbered 770 and higher, are automatically included in the California Register. Other properties recognized under the California Points of Historical Interest program, identified as significant in historical resources surveys or designated by local landmarks programs, may be nominated for inclusion in the California Register. A resource, either an individual property or a contributor to a historic district, may be listed in the California Register if the SHRC determines that it meets one or more of the following criteria, which are modeled on National Register criteria:

- Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- Criterion 2: It is associated with the lives of persons important in our past.

- Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.
- Criterion 4: It has yielded, or may be likely to yield, information important in history or prehistory.

Under PRC §5024.1 and 14 CCR §4852(c), a cultural resource must retain integrity to be considered eligible for the California Register. Specifically, it must retain sufficient character or appearance to be recognizable as a historical resource and convey reasons of significance. Integrity is evaluated with regard to retention of such factors as location, design, setting, materials, workmanship, feeling, and association.

Typically, a prehistoric archaeological site in California is recommended eligible for listing in the California Register based on its potential to yield information important in prehistory or history (Criterion 4). Important information includes chronological markers such as projectile point styles or obsidian artifacts that can be subjected to dating methods or undisturbed deposits that retain their stratigraphic integrity. Sites such as these have the ability to address research questions.

California Historical Landmarks

California Historical Landmarks (CHLs) are buildings, structures, sites, or places that have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value and that have been determined to have statewide historical significance by meeting at least one of the criteria listed below. The resource also must have written consent of the property owner; be recommended by the SHRC; and be officially designated by the Director of California State Parks. The specific standards now in use were first applied in the designation of CHL No770. CHLs No770 and above are automatically listed in the California Register.

To be eligible for designation as a CHL, a resource must meet at least one of the following criteria:

- It is the first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California);
- It is associated with an individual or group having a profound influence on the history of California; or
- It is a prototype of, or an outstanding example of, a period, style, architectural movement, or construction or is one of the more notable works or the best surviving work in a region of a pioneer architect, designer, or master builder.

California Points of Historical Interests

California Points of Historical Interest are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Points of Historical Interest designated after December 1997 and recommended by the SHRC are also listed in the California Register. No historic resource may be designated as both a landmark and a point. If a point is later granted status as a landmark, the point designation is retired. In practice, the point designation program is most often used in localities that do not have a locally enacted cultural heritage or preservation ordinance.

To be eligible for designation as a Point of Historical Interest, a resource must meet at least one of the following criteria: (1) it is the first, last, only, or most significant of its type within the local geographic region (city or county); (2) it is associated with an individual or group having a profound influence on the history of the local area; or (3) it is a prototype of, or an outstanding example of, a period, style, architectural movement, or construction or is one of the more notable works or the best surviving work in the local region of a pioneer architect, designer, or master builder.

California Historical Resource (CHR) Status Codes

A resource must meet at least one of the above-listed criteria and retain enough integrity to support its period of significant and association within a historical context. A resource is assigned a CHR status code following evaluation, which identifies its significant level.

The status codes and descriptions are listed below:

1. Properties listed in the National Register or the California Register.
2. Properties determined eligible for listing in the National Register or California Register.
3. Appears eligible for the National Register or California Register through survey evaluation.
4. Appears eligible for the National Register or California Register through other evaluation.
5. Properties recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated for the National Register or California Register or needs re-evaluation

California Historic Building Code

The California Historic Building Code (CHBC) provides guidelines for the preservation, restoration, rehabilitation, relocation, and reconstruction of buildings or structures designated as qualified historical buildings or properties by a local, State, or Federal jurisdiction, as defined by CHBC §8-218. The CHBC provides guidelines for long-term preservation efforts of qualified historical buildings or properties in order to allow owners to make improvements for access for persons with disabilities; to provide a cost-effective approach to preservation; and, to ensure overall safety of affected occupants or users.

As defined by the CHBC, a "qualified historical building" is "any building, site, structure, object, district, or collection of structures, and their associated sites, deemed of importance to the history, architecture, or culture of an area by an appropriate local, state, or federal governmental jurisdiction. This includes designated buildings or properties on, or determined eligible for, official national, state, or local historical registers or official inventories, such as the National Register, California Register, State Historical Landmark, State Points of Historical Interest, and officially adopted city or county registers, inventories, or surveys of historical or architecturally significant sites, places, or landmarks."[1]

[1] California Historic Building Code (§§18950 to 18961 of Division 13, Part 2.7 of California Health and Safety Code).

Public Resources Code §5097.5 and §30244

PRC §5097.5 and §30244 prohibit the removal of any paleontological site or feature from public lands without permission of the jurisdictional agency, define the removal of paleontological sites or features as a misdemeanor, and require reasonable mitigation of adverse impacts to paleontological resources from developments on public (state, county, city, district) lands.

4.4.4 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, *Environmental Checklist Form*, includes questions concerning cultural resources. The issues presented in the Environmental Checklist have been used as thresholds of significance in this section. Accordingly, the Project would have a significant adverse environmental impact if it would:

- Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 (see Impact 4.4-1);
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 (see Impact 4.4-2);
- Disturb any human remains, including those interred outside of formal cemeteries (see Impact 4.4-3); and/or
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature (see Impact 4.4-4).

METHODOLOGY AND ASSUMPTIONS

The Project is evaluated against the aforementioned significance criteria/thresholds for determining the impact's level of significance concerning cultural and paleontological resources. The impact conclusions consider the potential for changes in environmental conditions, as well as compliance with the existing regulatory framework (i.e., laws, ordinances, regulations, and standards that avoid or reduce the potentially significant environmental impacts. Where significant impacts remain despite compliance with the regulatory framework, feasible mitigation measure (MMs) are recommended to avoid or reduce the Project's potentially significant environmental impacts. The determination that the Project would or would not result in "substantial" adverse effects on historical and archaeological resources and human remains considers the existing site's historical resource value and the severity of the Project implementation on resources that may be considered historical.

An impact to paleontological resources would be considered a significant impact if the Project results in the direct or indirect destruction of a unique or important paleontological resource or site. A Focus Area is deemed paleontologically sensitive if (1) it has fossils that have previously been recovered from a particular geologic unit; (2) there are recorded fossil localities within the same geologic units as occur within the project area; and (3) the types of fossil materials that have been recovered from the geologic unit are unique or important.

This section of the EIR relies upon 3.4, Cultural Resources, of the County Project EIR. That EIR and the detailed studies therein adequately address the cultural, historic, and paleontological resources present within the Specific Plan area, inclusive of the Focus Area.

4.4.5 IMPACTS AND MITIGATION

Impact 4.4-1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Significant Unavoidable Impact. The proposed Project would not result in direct construction but would facilitate and provide a policy framework for future development within the Focus Area. While the Project does not propose any development, future development could potentially result in direct impacts through the physical demolition, destruction, or alteration of potential historical resources within the Focus Area. As discussed above, the Focus Area is located within the Rancho Los Amigos Historic District and contains 27 contributor buildings, 24 non-contributors buildings, and 4 individually eligible buildings. The individually eligible buildings would be retained and would not be impacted by Project implementation. The Historic District has been determined to be eligible for listing on the National Register and is listed on the California Register as a Historic District.

Future development within the Focus Area assumes the demolition of contributor and non-contributor buildings and would remove remaining features of the Historic District's original 1888 Site Plan. The 1888 Site Plan is a contributing feature that consists of the Historic District's circulation paths, landscaping, and spatial relationships between the contributing buildings. Unless avoided, removal of contributing buildings, structures, and features and substantial alteration of the 1888 Site Plan would affect the integrity and historical significance of the Historic District, while removal of non-contributing buildings, structures, and features would not impact the Historic District's integrity or historical significance.

As discussed above, the approved County Project would remove 94 percent of Historic District contributors, resulting in ineligibility for the National Register and de-listing in the California Register. This was determined to constitute a significant and unavoidable impact. Like the proposed Project, the five individually eligible buildings within the Historic District would be retained as a part of the County Project. As of the date of publishing of this PEIR, no buildings within the Historic District have been demolished by the County, with project schedules that are subject to change. Accordingly, there is a potential that future development facilitated by the proposed Project would occur prior to County Project implementation. This development would necessitate removal of existing contributor and non-contributor buildings within the Focus Area.

Potential future removal of Historic District contributors would materially alter the Historic District in an adverse manner, resulting in a loss of all seven aspects of integrity (location, design, setting, materials, workmanship, feeling, and association) outlined by *National Register Bulletin 15* to retain a historic district's integrity. As such, the Project would result in a significant impact to the Historic District, a qualified historical resource that has been determined eligible for the National Register and is listed in the California Register. The removal of the contributing resources would be expected to remove the area from eligibility for the National Register and require delisting from the California Register.

Implementation of **MM CR-1** through **MM CR-3** would reduce the impacts of future development facilitated by the Project on the Historic District. **MM CR-1** requires a Historic American Landscape Survey (HALS) Standard Format documentation of the District's contributing Site Plan, which has been identified as a District contributor. **MM CR-2** requires implementation of an interpretive and commemorative

program documenting the historical significance of Rancho Los Amigos and the Los Angeles County Poor Farm. The program will feature a variety of informational programming that may include an on-site interpretation program, artifacts, documentary film, and/or commemorative plaques to educate the public on the importance of the site. **MM CR-3** requires preparation of an inventory of Historic District contributors that will be demolished and identification of their key character-defining physical features appropriate for salvage and interpretation. Salvageable material would then be collected and made available for use in restoration or rehabilitation projects in the Specific Plan area, or in the interpretive program to be developed under **MM CR-2**.

Even with the implementation of these measures, impacts to the Historic District would remain significant and unavoidable since the District would no longer exist and there is no feasible mitigation to reduce this impact to less than significant.

There are five individually eligible buildings and structures in the RLASCSP area; four are within the Focus Area. All five buildings and structures would be retained, construction activities associated with future development in the Focus Area would have the potential for inadvertent material damage or indirect effects from vibration. Additional impacts could occur from structural deterioration from improper maintenance, neglect, and vandalism. Implementation of **MM CR-4** and **MM CR-5** would serve to reduce the impacts of future development facilitated by the Project. **MM CR-4** requires implementation of a Mothballing Plan by a qualified preservation professional in accordance with National Park Service guidelines that would ensure historic structures are stabilized and preserved for potential future use. **MM CR-5** requires installation of protective barriers around historical resources to prevent trespassing and off-site impacts during future project construction. Implementation of **MM CR-4** and **MM CR-5** would reduce potential impacts to individually eligible historic structures to a less than significant level.

Notwithstanding, while this PEIR recommends documentation as mitigation to reduce the impact to the Historic District, the impact would be considered significant and unavoidable. Future development facilitated by the proposed Project would remove contributor buildings and remove identifying characteristics of the Historic District's 1888 Site Plan. This determination is consistent with the findings of the County Project EIR, which finds the loss of contributors to the Historic District to be a significant and unavoidable impact.

Mitigation Measures

MM CR-1 **Recordation of the Historic District's Site Plan.** The buildings in the Historic District were previously recorded in a HABS report; however, one contributing component of the District was not recorded at the time: the landscape and site plan. Prior to any demolition or ground disturbing activity, the property owner shall retain a Qualified Preservation Professional to prepare a Historic American Landscape Survey (HALS) Level I Standard Format documentation of the Historic District's Site Plan and landscape setting, including hardscape and softscape elements and features from the historic period of significance, such as roadways, curbs, sidewalks, mature trees, fields, gardens, and green spaces. The HALS documentation of the Historic District's Site Plan shall record the history of the contributing elements, as well as important events or other significant contributions to the patterns and trends of history with which the property is associated.

The HALS documentation of the District's Site Plan shall include measured and interpretive drawings, large-format black and white photographs, and written histories documenting the District's evolution over time. Field photographs and notes shall also be included. All documentation components shall be completed in accordance with the Secretary of the Interior's Standards and Guidelines for Historic American Landscape Survey (HALS standards).

The Qualified Preservation Professional shall submit the HALS documentation to the National Park Service for transmittal to the Library of Congress, and archival copies shall be sent to Rancho Los Amigos, County of Los Angles Natural History Museum, Rancho Los Amigos Archives at University of Southern California, and Downey History Center. The Qualified Preservation Professional shall submit proof of submittal to the City no less than 30 days prior to the start of demolition of District contributing buildings, structures, and features.

MM CR-2 **Interpretive and Commemorative Program.** The property owner shall retain a Qualified Preservation Professional to develop and implement a publicly accessible interpretive and commemorative program (Program) that captures and incorporates the important cultural history, associations, and significance of the Rancho Los Amigos Historic District for the public benefit, such that the cultural importance of the Los Angeles County Poor Farm and Rancho Los Amigos is retained for future generations. The Program's requirements shall be outlined in a technical memorandum, including the requirements for maintenance and operation of the program's elements that may include but not be limited to an on- or off-site exhibit, commemorative marker, oral history, video, or other publicly accessible media. The interpretive and commemorative program shall be aimed at actively illustrating the following:

- The growth and development of the Los Angeles County Poor Farm and Rancho Los Amigos during the late 19th and early 20th centuries.
- How the activities and events that occurred within the District were associated with changing attitudes toward healthcare throughout the County, State, and Nation.

The technical memorandum detailing the Program's requirements and implementation schedule shall be prepared by a Qualified Preservation Professional and reviewed by interested parties such as the Los Angeles Conservancy prior to commencement of demolition and construction activities. The Qualified Preservation Professional shall submit quarterly reports (i.e., January, April, July, and October) to the City documenting the progress of the Program's implementation. The Qualified Preservation Professional shall submit documentation illustrating full implementation of the Program to the City within three years of completion of construction.

MM CR-3 **Salvage Plan and Inventory Report.** Prior to the start of demolition, the property owner shall retain a Qualified Preservation Professional to prepare a Salvage Plan and Inventory Report outlining salvageable materials and reuse or disposal options. The Qualified Preservation Professional shall conduct an inventory of the Historic District contributors' key character-defining physical features (e.g., decorative features, window elements,

shingling, etc.) appropriate for salvage and interpretation. The Salvage Plan and Inventory Report shall include retention of LACO No. 1301 (Water Tower) for inclusion in the interpretive program. Unsound, decayed, or toxic materials (e.g., asbestos, lead paint, etc.) need not be included in the salvage plan. Once salvageable materials are identified, the Qualified Preservation Professional shall monitor their collection by future applicants' construction contractor(s) to ensure the items are appropriately salvaged and are not damaged during removal. Salvage of materials can occur prior to the start of demolition, or concurrently with demolition, as feasible. Salvaged materials shall be stored on-site either in existing structures, or in an off-site storage facility, to limit exposure to the elements (rain/sun, vandalism, and theft).

Salvaged materials shall first be made available for use in the interpretive program to be developed under **MM CR-2** or for use in any potential future restoration/rehabilitation projects on the Focus Area. Salvaged materials that are not re-used on-site or in the interpretative program shall be offered for donation to local historical societies, preservation organizations, or the like, for curatorial and/or educational purposes, or to the general public for reuse in rehabilitation of historic structures. Salvaged materials offered for donation shall be advertised for a period of not less than 30 days on the County's website and in historic preservation websites, such as Preservationdirectory.com and Oldhouseonline.com, and the Los Angeles Times, as well as by posting in the Specific Plan area itself and by other means as deemed appropriate.

The Qualified Preservation Professional shall document these efforts in writing, to include salvage methods, an inventory of salvaged materials, and a summary of all measures taken to encourage receipt of salvaged materials by local historical societies, preservation organizations, and the public.

Copies of notices and evidence of publication of such notices, along with a summary of results from the publicity efforts, a list of materials that were donated (if any) and to whom, and an explanation of why materials were not or could not be accepted, shall be included in a salvage summary document to be submitted to the City within 15 days of the close of the 30-day (or more) notice period. Salvaged materials that are not re-used on-site or in the interpretative program, or accepted for donation, may be disposed of by the City upon receipt of the salvage summary document.

MM CR-4 **Mothballing Plan**. The property owner shall retain a Qualified Preservation Professional to prepare and implement a Mothballing Plan for LACO No. 1283 (Casa Consuelo) and LACO No. 1301 (Water Tower). The Mothballing Plan shall outline the proposed mothballing process in compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and consistent with National Park Service Preservation Brief No. 31, Mothballing Historic Buildings. The Plan shall include at a minimum: a condition assessment; measures for structural stabilization as necessary; pest control measures; weatherization efforts as necessary; and other mothballing procedures, such as securing the building, providing adequate ventilation, and developing a maintenance and monitoring plan. Once the buildings/structures have been mothballed, the Qualified

Preservation Professional shall review the resulting condition of the buildings/structures and provide the City with documentation confirming that the Plan has been carried out.

Mothballing shall be completed within one year of the initiation of construction activities (construction and mothballing can occur simultaneous). Future applicants shall carry out the Plan's maintenance and monitoring procedures until such time as rehabilitation and/or reuse of the buildings/structures occurs. While there is currently no proposed use for these buildings/structures, any future rehabilitation project will be evaluated for conformance with the Secretary of Interior's Standards. Conditions of the mothballed buildings/structures shall be reassessed and documented every five years by a Qualified Preservation Professional and recommendations for necessary maintenance/structural repairs shall be completed by the property owner within six months of every reassessment.

MM CR-5 **Avoidance and Protection of Retained Historic Resources During Construction.** Prior to the start of construction, a Qualified Preservation Professional shall be retained by the property owner to develop a plan of action for avoidance and protection of the retained historic resources in the Focus Area, the Administration Building (LACO No. 1100); the grouping of the Power Plant (LACO No. 1300); Water Tower (1301); and the Shop, Laundry and Ice Plant (LACO No. 1302), and the Moreton Bay Fig Tree in coordination with the City. The plan shall include at a minimum:

1. Notation of the building/structure/feature on construction plans.
2. Pre-construction survey to document the existing physical condition of the building/structure/feature.
3. Procedures and timing for the placement and removal of a protective barrier(s), such as protective wood boards, bracing or framing to protect fragile fenestration and other exposed architecture features and materials, protective fencing and/or concrete or water-filled plastic K-rails around each retained building/ structure/feature.
4. Monitoring of the installation and removal of protective barriers by the Qualified Preservation Professional, or his or her designee.
5. Monitoring of the condition of the building/structure/feature at regular intervals during the duration of demolition and construction including vibration monitoring and visual inspections by a qualified Preservation Professional.
6. Post-construction survey to document the condition of the building/ structure/feature after completion of the Project.
7. Preparation of a technical memorandum documenting the pre-construction and post-construction conditions of historic structures and compliance with protective measures outlined in this mitigation measure.

The plan shall comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) and shall be memorialized in a technical memorandum, which shall be submitted to City for review and approval. The final approved plan shall be

submitted to City no later than 30 days prior to the start of construction including any staging or demolition activities. The plan shall be provided to each construction manager/foreman at the Project kick-off meeting for each phase of work. The technical memorandum documenting the pre-construction and post-construction conditions shall be submitted to the City within 30 days of completion of the Project and removal of the protective barriers.

In addition, prior to the start of construction, future project applicants shall inform construction personnel of the location and significance of the retained historic resources, and of the avoidance and protective measures that shall be implemented. If work crews are phased, the City shall ensure that each crew is provided with this information, video, or other publicly accessible media. The interpretive and commemorative program shall be aimed at actively illustrating the following:

- The growth and development of the Los Angeles County Poor Farm and Rancho Los Amigos during the late 19th and early 20th centuries.
- How the activities and events that occurred within the District were associated with changing attitudes toward healthcare throughout the County, state, and Nation.

The technical memorandum detailing the Program's requirements and implementation schedule shall be prepared by a Qualified Preservation Professional and reviewed by interested parties such as the Los Angeles Conservancy and approved by the City prior to commencement of demolition and construction activities. The Qualified Preservation Professional shall submit quarterly reports (i.e., January, April, July, and October) to the City documenting the progress of the Program's implementation. The Qualified Preservation Professional shall submit documentation illustrating full implementation of the Program to the City within three years of completion of construction.

Impact 4.4-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less than Significant with Mitigation. The archaeological resources survey conducted for the County Project EIR included a portion of the Focus Area and is representative of general site conditions and sensitivity throughout the South Campus. No archaeological resources were identified as a result of the survey. Further, no archaeological sites have been previously recovered within the Specific Plan area.

While the Project does not propose any development or ground-disturbing activities such as grading or excavation, it can be assumed that future development within the Focus Area could impact archaeological resources through such activities. The likelihood of encountering archeological resources on undeveloped sites is greatest on sites that have been minimally excavated in the past (e.g., undeveloped parcels). Previously excavated areas are generally considered to have a lower potential for archeological resources since the previously graded areas may have already removed or disturbed the soil that may have previously contained resources.

Notwithstanding, the Focus Area is considered to have a high sensitivity for the presence of buried archaeological sites based upon the following factors: the Holocene to late Pleistocene age of soil parent material; the historic proximity of the Focus Area to perennial sources of water including to the confluence

of the Los Angeles River and the Rio Hondo; depositional processes given the proximity to the rivers; the gentle slopes within the area; the proximity to documented Gabrieleno villages and their associated territories; the limited nature of previous subsurface disturbances based on the type and age of extant development on the Focus Area; and the limited native ground surface visibility during the County Project archaeological survey.

A significant impact would occur if future grading and construction activities would result in a substantial adverse change in the significance of an archaeological resource determined to be "historic" or "unique." As defined in PRC §21083.2, a "unique" archaeological resource is an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Although the Project proposes no development or construction, future development facilitated by the RLASCSP has the potential to disturb and potentially destroy subsurface prehistoric/historic archaeological resources through grading and development. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including all federal, state and local requirements for protecting archeological resources. In the likelihood that future development would impact archeological resources, **MM CR-6** through **MM CR-9** would be required. Implementation of these measures would reduce potential future impacts to a less than significant level.

Mitigation Measures

MM CR-6 **Retention of a Qualified Archaeologist.** Prior to any ground-disturbing activities (i.e., demolition, pavement removal, pot-holing or augering, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the Applicant or their designee shall retain a Qualified Archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology to oversee and ensure all mitigation related to archaeological resources is implemented.

MM CR-7 **Construction Worker Cultural Resources Sensitivity Training**. Prior to any ground-disturbing activities (i.e., demolition, pavement removal, pot-holing or augering, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the Qualified Archaeologist, or his/her designee, and a Native American representative (selected from this Project's California Native American Heritage Commission [NAHC] contact list), shall conduct cultural resources sensitivity training for all construction personnel. In the event construction crews are phased, additional training shall be

conducted for new construction personnel. Construction personnel shall be informed of the types of archaeological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains (see **MM CR-10**), confidentiality of discoveries, and safety precautions to be taken when working with cultural resources monitors. The contractor shall ensure and document that construction personnel are made available for and attend the training and retain documentation demonstrating attendance. This training may be conducted in coordination with paleontological resources training required by **MM CR-12**.

MM CR-8 **Cultural Resources Monitoring Program (CRMP)** Prior to any ground-disturbing activity (i.e., demolition, pavement removal, pot-holing or augering, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the Qualified Archaeologist shall prepare the CRMP based on the final City-approved Project design plans. The CRMP shall include:

1. *Provisions for Archaeological Monitoring.* Full-time archaeological monitoring shall be required for all construction-related ground-disturbing activity up to a depth of five feet (depth at which archaeological sensitivity decreases). The CRMP shall outline the archaeological monitor(s) responsibilities and requirements (**MM CR-4**).

2. *Procedures for Discovery of Archaeological Resources.* Procedures to be implemented if an archaeological resource is discovered shall be fully defined in the CRMP, including stop-work and protective measures, notification protocols, procedures for significance assessments, and appropriate treatment measures. The CRMP shall state that avoidance or preservation in place is the preferred manner of mitigating impacts to archaeological resources, but shall provide procedures to follow should the City determine that avoidance is infeasible.

   If, based on the Qualified Archaeologist's recommendation, it is determined that the discovered archaeological resource constitutes a historical resource or unique archaeological resource pursuant to CEQA, avoidance and preservation in place shall be the preferred manner of mitigating impacts to such a resource. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. If the City determines that preservation in place is infeasible and data recovery through excavation is the only feasible mitigation available, the Qualified Archaeologist in coordination with the City shall prepare and implement an Archaeological Resources Data Recovery and Treatment Plan that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resource. The City shall consult with appropriate Native American representatives in determining treatment of resources that are Native American in origin to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered.

3. *Reporting Requirements.* The CRMP shall outline provisions for weekly, monthly, and final reporting. The Qualified Archaeologist shall prepare weekly status reports detailing activities and locations observed (with maps) and summarizing any discoveries for the duration of monitoring to be submitted to the City via email for each week in which monitoring activities occur. Monthly progress reports summarizing monitoring efforts shall be prepared and submitted to the City for the duration of ground-disturbing activity. The Qualified Archaeologist shall prepare a draft CRMP and submit it to the City within 30 days of completion, or within 120 days of completion of treatment for significant discoveries if treatment extends beyond the cessation of monitoring. The final Archaeological Resources Monitoring Report shall be submitted to the City within 15 days of receipt of City comments. The Qualified Archaeologist shall also submit the final Archaeological Resources Monitoring Report to the South Central Coastal Information Center. If human remains are encountered, a confidential report documenting all activities shall be submitted to the NAHC within 90 days of completion of any treatment.

4. *Curation Requirements.* Any historic-period archaeological materials that are not Native American in origin shall be curated at an American Association of Museums accredited repository that meets 36 Code of Federal Regulations (CFR) 79.9 standards. If no accredited repository accepts the collection, then it may be curated at a non-accredited repository as long as it meets the minimum 36 CFR 79.9 standards. If neither an accredited nor a non-accredited repository accepts the collection, then it may be offered to a public, non-profit institution with a research interest in the materials, or donated to a local school or historical society in the area for educational purposes, to be determined by the Qualified Archaeologist in consultation with the City. Disposition of Native American archaeological materials shall be determined through consultation between Native American representatives, the Qualified Archaeologist, and the City.

5. *Protocols for Native American Input.* The CRMP shall outline the role and responsibilities of Native American Tribal representatives. It shall include communication protocols, an opportunity and timelines for review of cultural resources documents related to archaeological discoveries that are Native American in origin, and provisions for Native American monitoring in the event of archaeological discoveries that are Native American in origin. The CRMP shall include provisions for Native American monitoring during testing and data recovery efforts for discovered resources that are Native American in origin.

MM CR-9 **Archaeological Monitoring.** All ground-disturbing activity (i.e., demolition, pavement removal, pot-holing or augering, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil) to a depth of 5.0 feet (depth at which archaeological sensitivity decreases) shall be monitored by an archaeological monitor(s) familiar with the types of resources that could be encountered and shall work under the Qualified Archaeologist's direct supervision. The Qualified Archaeologist shall determine the number of archaeological monitors required on-site during ground-disturbing activities based on the

construction scenario, pieces of equipment operating at the same time, the distance between those pieces of equipment, and the pace at which equipment is working, with the goal of monitors being able to effectively observe soils as they are exposed. The archaeological monitor(s) shall keep daily logs detailing the types of activities and soils observed, and any discoveries. Archaeological monitor(s) shall have the authority to halt and re-direct ground-disturbing activities in the event of a discovery until it has been assessed for significance and treatment implemented, if necessary, based on the Qualified Archaeologist's recommendations in coordination with the City, and the Native American representatives if the resource is Native American in origin, and in accordance with the CRMP protocols and procedures (see **MM CR-5**).

Impact 4.4-3: Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant with Mitigation. The archaeological records search and field survey conducted for the County Project did not reveal any resources known to contain human remains within or near the South Campus. The Project area is considered sensitive for archaeological resources. It is possible that future development facilitated by the RLASCSP would have the potential to reveal unknown human remains. If human remains are found, those remains would require proper treatment in accordance with applicable laws, including Health and Safety Code (HSC) §§7050.5-7055 and PRC §5097.98 and §5097.99. HSC §§7050.5-7055 describe the general provisions for treatment of human remains. Specifically, HSC §7050.5 prescribes the requirements for the treatment of any human remains that are accidentally discovered during excavation of a site. HSC §7050.5 also requires that all activities cease immediately, and a qualified archaeologist and Native American monitor be contacted immediately. As required by state law, the procedures set forth in PRC §5087.98 would be implemented, including evaluation by the County Coroner and notification of the NAHC. The NAHC would then designate the Most Likely Descendant (MLD) of the unearthed human remains.

If human remains are found during excavation, excavation would be halted in the vicinity of the find and any area that is reasonably suspected to overlay adjacent remains shall remain undisturbed until the County Coroner has investigated, and appropriate recommendations have been made for the treatment and disposition of the remains. Compliance with the established regulatory framework (i.e., HSC §§7050.5-7055 and PRC §5097.98 and §5097.99) would ensure Project impacts concerning human remains are reduced to a less than significant level. Compliance with **MM CR-10** would further minimize potential impacts to human remains.

Mitigation Measures

MM CR-10 **Unanticipated Discovery.** In the event that human remains are discovered or unearthed, all earth-disturbing work within a 100-meter radius of the location of the human remains shall be temporarily suspended or redirected by the applicant until a forensic expert retained by the applicant has identified and evaluated the nature and significance of the find, in compliance with State CEQA Guidelines §15064.5(f). If human remains of Native American origin are discovered or unearthed, the applicant shall contact the consulting tribe, as detailed in **MM TCR-1**, regarding any finds and provide information after the archaeologist makes his/her initial assessment of the nature of the find, so as to

provide Tribal input concerning significance and treatment. After the find has been appropriately mitigated, as determined and documented by a qualified archaeologist, work in the area may resume.

Impact 4.4-4: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant with Mitigation. As evaluated in the County Project EIR, the surficial sediments, identified as Young Alluvium (Qya), are too young to preserve fossils and, therefore, have low paleontological sensitivity. However, older alluvial sediments are present in the subsurface and have high paleontological sensitivity. No development is proposed as a part of Project. However, future developments in the Focus Area could include excavation in previously undisturbed sediments with a high sensitivity for fossils. Therefore, the proposed Project could significantly impact unknown unique paleontological resources which may occur at depths of five feet or greater below the ground surface.

With implementation of **MM CR-11** through **MM CR-14**, which require retention of a qualified paleontologist to oversee implementation of paleontological resources mitigation, construction worker paleontological resources sensitivity training, paleontological resources monitoring, and procedures to follow in the event of paleontological resources discoveries, impacts to unique paleontological resources or sites would be less than significant.

MM CR-11 **Retention of a Qualified Paleontologist.** Prior to start of any ground-disturbing activities (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the property owner shall retain a Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) standards (SVP, 2010). The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the Project kick-off meeting and Project progress meetings on a regular basis, and shall report to the Project Site in the event potential paleontological resources are encountered.

MM CR-12 **Construction Worker Paleontological Resources Sensitivity Training.** Prior to start of any ground-disturbing activities (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the Qualified Paleontologist, or his/her designee, shall conduct construction worker paleontological resources sensitivity training. In the event construction crews are phased, additional training shall be conducted for new construction personnel. The training shall focus on the recognition of the types of paleontological resources that could be encountered within the Focus Area, the procedures to be followed if they are found, confidentiality of discoveries, and safety precautions to be taken when working with paleontological monitors. The property owner shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance. This training may be conducted in coordination with cultural resources training required by **MM CR-7**.

MM CR-13 **Paleontological Resources Monitoring.** Full-time paleontological resources monitoring shall be conducted for all ground disturbing activities at or below five feet (depth at which paleontological resources sensitivity increases). The Qualified Paleontologist shall spot check the excavation on an intermittent basis and recommend whether the depth or frequency of required monitoring should be revised based on his/her observations. Paleontological resources monitoring shall be performed by a qualified paleontological monitor (meeting the standards of the SVP) under the direction of the Qualified Paleontologist. The number of paleontological monitors required to be on-site during ground disturbing activities shall be determined by the Qualified Paleontologist and shall be based on the construction scenario, specifically the number of pieces of equipment operating at the same time, the distance between these pieces of equipment, and the pace at which equipment is working, with the goal of monitors being able to effectively observe soils as they are exposed. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils in order to recover the fossil specimens.

Any significant fossils collected during project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. Monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries. The Qualified Paleontologist shall prepare weekly status reports detailing activities and locations observed (with maps) and summarizing any discoveries for the duration of monitoring to be submitted to the City of Downey via email for each week in which monitoring activities occur. Monthly progress reports summarizing monitoring efforts shall be prepared and submitted to the City for the duration of ground disturbance. The Qualified Paleontologist shall prepare a draft Paleontological Resources Monitoring Report and submit it to the City within 30 days of completion of the monitoring program, or within 120 days of completion of treatment for significant discoveries should treatment extend beyond the cessation of monitoring. The final Paleontological Resources Monitoring Report shall be submitted to the City within 15 days of receipt of City comments. If significant fossils are recovered, the final report shall also be filed with the Natural History Museum of Los Angeles County and the certified repository.

MM CR-14 **Inadvertent Discovery of Paleontological Resources.** If construction or other Project personnel discover any potential fossils during construction, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and made recommendations as to the appropriate treatment. If the find is deemed significant, it shall be salvaged following the standards of the SVP (SVP, 2010) and curated with a certified repository.

4.4.6 CUMULATIVE IMPACTS

This section presents an analysis of the cumulative effects of the proposed Project in combination with other past, present, and reasonably foreseeable future projects that could cause cumulatively considerable impacts. Related projects in the vicinity of the proposed Project are provided in **Section 3.0: Cumulative Impacts.**

Historical Resources. Cumulative impacts to historical resources evaluate whether impacts of the Project and related projects, when taken as a whole, substantially diminish the number of historical resources within the same or similar context or property type. Although impacts to historical resources, if any, tend to be site specific, cumulative impacts may involve resources that are examples of the same style or property type as those within a project site. Cumulative impacts would also occur if the Project and related projects cumulatively affect historical resources in the immediate vicinity.

As stated previously, the Project would directly result in significant unavoidable impact on the District, rendering it no longer eligible. However, the Project would retain individually eligible buildings located on the South Campus. The cumulative impacts on these eligible historical resources in combination with nearby related projects are assessed in the following section. Five of the cumulative projects may have historical resources located on the same site or may impact views of historical resources in the immediate Specific Plan area, as described below.

The West Santa Ana Branch Transit Corridor proposes a new light rail transit line, running from Union Station in the north towards the Los Angeles/Orange County line in the south, passing through the southwest portion of the Focus Area. The project includes a proposed Gardendale Station in the southwest part of the Focus Area. No historical resources are being removed or altered as a part of this project that would cumulatively contribute to the Project's impacts to historical resources.

The Rancho Los Amigos National Rehabilitation Center Consolidation Project includes the construction of a new 109,000-square-foot (SF) outpatient building, a 12,000-SF wellness center, a 44,000-SF addition to the Jaquelin Perry Institute, a 13,000-SF warehouse building, renovations to the Support Services Annex and Harriman Building, infrastructure improvements, and the demolition of vacant structures. The project is located on the Rancho Los Amigos North Campus, approximately 0.4 mile (2,200 feet) north of the Focus Area. In 2004, a survey of the North Campus conducted by Kaplan Chen Kaplan identified the Harriman Building (LACO No. 1180) as eligible for the National Register. According to the EIR for this project, renovation of the Harriman Building would be consistent with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. This Project will alter a historical resource that is associated with the same historical context as the District and remaining individually eligible historical resources within the Focus Area. While the alterations proposed by this cumulative project would result in a less than significant impact to LACO No. 1180 because they are consistent with Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, the removal of the Historic District would cumulatively contribute by diminishing the number of historical resources within the historical context of Rancho Los Amigos.

The Downey Recuperative Care Center is a 78,000-SF building located within the Rancho Los Amigos National Rehabilitation Center Campus. The project will convert the existing acute care building into a recuperative care facility. The project is located approximately 0.4 mile (2,200 feet) north of the Focus Area. No historical resources are being removed or altered as a part of this project. Therefore, no cumulative impacts to the historical resources are anticipated.

The Downey Sports Center is located in the southern portion of the Specific Plan area. It will include multi-use, lighted sports fields and a one-story building on the five-acre site. New facilities include public restrooms and concession and storage space. As part of the prior evaluation for this project, it was assumed that LACO Nos. 1283, 1286, and 1287 would be mothballed, as they were each identified in

previous evaluations as contributors to the Historic District. Since the time of its approval, LACO No. 1287 suffered fire damage and was completely destroyed. LACO No. 1286 was identified as a non-contributor in the updated Historic District evaluation and is proposed for demolition. LACO No. 1283, a contributor to the Historic District, is proposed for demolition. Once construction of the Sports Center is complete, there would be no impacts to the Historic District, as LACO No. 1283 will no longer remain. The removal of the District and introduction of new construction proposed by the Project and the Sports Center would alter the setting of the remaining individually eligible buildings. However, as previously stated in the Project's indirect impacts analysis, the setting has already been altered over time and does not contribute significantly to the eligibility of the remaining resources. Therefore, the cumulative impact of the Project and the Sports Center on the remaining individually eligible historical resources would be less than significant because the resources would retain their eligibility.

The Rancho Los Amigos South Campus Project (County Project), is adjacent to the northern and southwestern boundaries of the Focus Area. The project would develop three new County administrative buildings totaling up to approximately 650,000 SF of uses. The County Project EIR and associated cultural resource studies have been incorporated by reference herein (see **Section 1.0: Introduction**). As discussed above, project implementation would result in significant and unavoidable impacts to the Historic District.

The incremental effects on related historical resources caused by the Project and related projects are cumulatively considerable, diminishing the number of resources associated with the Rancho Los Amigos historical context. When considered in combination with the impacts of these noted projects in the cumulative scenario, the Project would contribute incrementally to significant impacts on historical resources. **MM CR-1** through **MM CR-5** would avoid, minimize, rectify, reduce, or compensate for the significance of the impacts to the degree feasible. However, they would not mitigate impacts below the level of significance. Therefore, no feasible mitigation exists that would reduce the Project's contribution to less than considerable. Impacts of the Project would combine with impacts from past, present, and reasonably foreseeable projects, and the Project's contribution toward cumulative effects on historical resources associated with Rancho Los Amigos would be cumulatively considerable.

Archaeological Resources. Multiple projects, mostly development within urban settings, are proposed throughout the geographic scope of analysis. Cumulative impacts to archaeological resources could occur if any of these projects, in conjunction with the proposed Project, would have impacts on resources that, when considered together, would be significant; however, the proposed Project would not affect known archaeological resources. Further, while there is the potential for impacts to unknown archaeological resources, such as those that might be discovered during ground-disturbing activities, construction and demolition associated with future development facilitated by the proposed Project, **MM CR-6** through **MM CR-9**, which provide for retention of a qualified archaeologist, cultural resources sensitivity training, development of a cultural resources monitoring and mitigation plan, archaeological monitoring, Native American coordination, and treatment of unanticipated discoveries, would ensure that impacts are reduced to a less-than-significant level. Taken together, implementation of these mitigation measures would ensure that the Project would not have an impact on archaeological resources. Therefore, the cumulative effects to archaeological resources from this Project are considered less than significant.

Paleontological Resources. Development of the Focus Area, in combination with other projects in the region where a parcel is underlain by early Holocene or older alluvial sediment could contribute to the progressive loss of fossil-bearing strata in either rock unit that could uncover fossil remains and

unrecorded fossil sites. The proposed Project would cumulatively contribute to a potentially significant impact without mitigation. Given that mitigation measures would be imposed and enforced, the contribution of potential impacts from the cumulative loss of paleontological resources throughout the area would not be cumulatively considerable, and would therefore be less than significant.

4.4.7 SIGNIFICANT UNAVOIDABLE IMPACTS

With implementation of mitigation, potential impacts to prehistoric archaeological resources, human remains, and paleontological resources would be reduced to a level considered less than significant. The demolition of a historic building is an adverse impact to the resource. Yet in situations where relocation is the only feasible alternative to demolition, the relocation of a building may mitigate the adverse impacts to below a level of significance provided that the new location is compatible with the original character and use of the historic resource and the resource retains its integrity for listing. Because the feasibility of relocation of individually eligible and contributing structures to the Historic District to retain the integrity of the Historic District cannot be determined at this time, the impact would remain significant and unavoidable.

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4.5 ENERGY

4.5.1 INTRODUCTION

This section analyzes impacts on energy resources due to construction and operation of the proposed Project. This section provides a summary of the Project's anticipated energy needs, impacts, and conservation measures.

This PEIR section relies upon and incorporates by reference in its entirety the County of Los Angeles Rancho Los Amigos South Campus Project EIR (County Project EIR) Section 3.5: Energy. The analysis conducted for the County Project EIR included a portion of the Focus Area and is representative of general site conditions throughout the South Campus. That EIR and the detailed studies therein adequately address the potentially occurring and existing energy components, and all mitigation strategies are applicable.

4.5.2 AFFECTED ENVIRONMENT

EXISTING ELECTRICITY SALES

Southern California Edison (SCE) is the electricity provider for the City of Downey. SCE provides electrical services to approximately 15 million people, 180 incorporated cities, 15 counties, 5,000 large businesses, and 280,000 small businesses throughout its 50,000-square-mile service area.[1]

SCE produces and purchases energy from a mix of conventional and renewable generating sources. **Table 4.5-1: SCE Power Content Level** shows the electric power mix that was delivered to retail customers for SCE compared to the statewide power mix for 2019, the most recent year in which data is available.

SCE is required to commit to the use of renewable energy sources for compliance with the Renewables Portfolio Standard (RPS). Specifically, SCE is required to meet the requirement to procure at least 33 percent of its energy portfolio from renewable sources by 2020 through the procurement of energy from eligible renewable resources, to be implemented as fiscal constraints, renewable energy pricing, system integration limits, and transmission constraints permit. SB 350 (Chapter 547, Statutes of 2015) further increased the RPS to 50 percent by 2030 and included interim targets of 40 percent by 2024 and 45 percent by 2027. Eligible renewable resources are defined in the RPS to include biodiesel; biomass; hydroelectric and small hydro (30 Mega Watts [MW] or less); aqueduct hydropower plants; digester gas; fuel cells; geothermal; landfill gas; municipal solid waste; ocean thermal, ocean wave, and tidal current technologies; renewable derived biogas; multi-fuel facilities using renewable fuels; solar photovoltaic (PV); solar thermal electric; wind; and other renewables that may be defined later. SB 100 (Chapter 312, Statutes of 2018) further increases the RPS to 50 percent by December 31, 2026 and to achieve 60 percent by December 31, 2030. SB 100 also states that eligible renewable energy sources and zero-carbon resources supply 100 percent of retail sales of electricity and 100 percent of electricity procured to serve state agencies by December 31, 2045. According to the 2019 Edison International Sustainability Report, SCE provided approximately 48 percent of its 2019 electric supply from renewable power.[2]

[1] Southern California Edison (SCE). 2021. *About Us.* Available at: Who We Are | About Us | Home - SCE, Accessed May 25, 2021.
[2] Edison International, Energy for What's Ahead: Edison International and Southern California Edison 2020 Annual Report. Available at 2020-eix-sce-annual-report.pdf (edison.com). Accessed April 28, 2021.

Table 4.5-1: SCE Power Content Level

Energy Resources	SCE Power Mix	SCE Green Rate 50% Option	SCE Green Rate 100% Option	2019 CA Power Mix
Eligible Renewables	35.1 %	67.5 %	100 %	31.7 %
Biomass and Biowaste	0.6 %	0.3 %	0.0 %	2.4 %
Geothermal	5.9 %	2.9 %	0.0 %	4.8 %
Eligible Hydroelectric	1.0 %	0.5 %	0.0 %	2.0 %
Solar	16.0 %	58.0 %	100.0 %	12.3 %
Wind	11.5 %	5.7 %	0.0 %	10.2 %
Coal	0.0 %	0.0 %	0.0 %	3.0 %
Large Hydroelectric	7.9 %	4.0 %	0.0 %	14.6 %
Natural Gas	16.1 %	8.1 %	0.0 %	34.2 %
Nuclear	8.2 %	4.1 %	0.0 %	9.0 %
Other	0.1 %	0.1 %	0.0 %	0.2 %
Unspecified Sources of Power[1]	32.6 %	16.3 %	0.0 %	7.3 %
TOTAL	100 %	100 %	100 %	100 %
Percentage of Retail Sales Covered by Retired Unbundled RECs[2]	2.9	1.4	0.0	

[1] Unspecified power is electricity that has been purchased through open market transactions and is not traceable to a specific generation source.

[2] Renewable energy credits (RECs) are tracking instruments issued for renewable generation. Unbundled renewable energy credits (RECs) represent renewable generation that was not delivered to serve retail sales. Unbundled RECs are not reflected in the power mix or GHG emissions intensities above.

Source: SCE, 2019 Power Content Label, October 2020.

EXISTING NATURAL GAS SUPPLY

Natural gas is used for cooking, space heating, water heating, electricity generation, and as an alternative transportation fuel. Southern California Gas Company (SoCalGas) is responsible for providing natural gas supply to the region and is regulated by the California Public Utilities Commission (CPUC) and other state agencies. The annual natural gas demand in 2017 was approximately 946 billion kilo British thermal units (kBtu).[3]

EXISTING PROJECT SITE

Approximately 193,900 square feet (SF) of the existing buildings are vacant, and 93,900 SF of the existing buildings are occupied. The occupied Focus Area buildings include a Los Angeles County Public Works facility and storage yard and Los Angeles County Animal Shelter buildings located beyond the Union Pacific Railroad corridor. The proposed Project assumes energy demand to be all net new demand, and no credit taken from the existing onsite land uses.

[3] California Gas and Electric Utilities, 2018. California Gas Report. Available online at https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf. Accessed March 12, 2021.

4.5.3 REGULATORY SETTING

FEDERAL

Energy Policy Act of 2005

The Energy Policy Act of 2005 seeks to reduce reliance on non-renewable energy resources and provide incentives to reduce current demand for these resources. For example, under this act, consumers and businesses can obtain federal tax credits for purchasing fuel-efficient appliances and products, including buying hybrid vehicles, building energy-efficient buildings, and improving the energy efficiency of commercial buildings. Additionally, tax credits are available for the installation of qualified fuel cells, stationary microturbine power plants, and solar power equipment.

STATE

State of California Integrated Energy Policy

In 2002, the Legislature passed Senate Bill 1389, which required the CEC to develop an integrated energy plan every two years for electricity, natural gas, and transportation fuels, for the California Energy Policy Report. The plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for Zero-Emission Vehicles and their infrastructure needs, and encouragement of urban designs that reduce vehicle miles traveled and accommodate pedestrian and bicycle access.

The CEC has adopted the 2021 Integrated Energy Policy Report Update, which assesses major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources, protect the environment, ensure reliable, secure, and diverse energy supplies, enhance the state's economy, and protect public health and safety. The 2021 Integrated Energy Policy Report Update covers a broad range of topics, including energy efficiency, building energy efficiency standards, achieving 50 percent renewables by 2030, and the California Energy Demand Forecast.

Title 24, Building Standards Code and California Green Building Standards (CALGreen) Code

The CEC first adopted the Energy Efficiency Standards for Residential and Non-residential Buildings (California Code of Regulations (CCR), Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the state. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods. The California Building Standards Commission (CBSC) adopted Part 11 of the Title 24 Building Energy Efficiency Standards, referred to as the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." The CALGreen Code establishes mandatory measures for new residential and non-residential buildings, which include requirements for energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The CALGreen Code was

most recently updated in 2019 to include new mandatory measures for residential as well as non-residential uses. The new measures took effect on January 1, 2020. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance.

Energy Sector

On April 12, 2011, then-Governor Jerry Brown signed SB X1-2 to increase California's Renewables Portfolio Standard to 33 percent by 2020. SB 350 (Chapter 547, Statues of 2015) further increased the Renewables Portfolio Standard to 50 percent by 2030. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027.

On September 2018, Governor Jerry Brown signed SB 100, which is now known as the 100 Percent Clean Energy Act of 2018. The Act declares that California Air Resources Board (CARB) should plan for 100 percent total retail sales of electricity in California come from eligible renewable energy resources and zero-carbon resources by December 31, 2045. SB 100 also set interim goals, accelerating the RPS, to 50 percent from renewable energy sources by 2026 and 60 percent by 2030.

2017 Climate Change Scoping Plan

CARB adopted the 2017 Climate Change Scoping Plan at a public meeting held in December 2017.[4] The 2017 Scoping Plan outlines the strategies the state will implement to achieve the 2030 GHG reduction target of 40 percent below 1990 levels by 2030 established by SB 32. The 2017 Scoping Plan is also intended to "substantially advance" toward the EO S-3-05 2050 climate goal to reduce GHG emissions by 80 percent below 1990 levels by 2050.

The 2017 Scoping Plan builds on the Cap-and-Trade Regulation, the Low Carbon Fuel Standard (LCFS), improved vehicle, truck and freight movement emissions standards, increasing renewable energy, and strategies to reduce methane emissions from agricultural and other wastes by using it to meet our energy needs. The 2017 Scoping Plan also comprehensively addresses GHG emissions from natural and working lands of California, including the agriculture and forestry sectors. The 2017 Scoping Plan considered a number of different alternatives to achieve the 2030 GHG reduction goal. The "Scoping Plan Scenario" was ultimately adopted and relies on the continuation of ongoing and statutorily required programs and continuation of the Cap-and-Trade Program. The Scoping Plan Scenario was modified from the January 2017 Proposed Scoping Plan to reflect AB 398, including removal of the 20 percent GHG reduction measure for refineries.[5]

CARB states that the Scoping Plan Scenario "is the best choice to achieve the state's climate and clean air goals."[6] Under the Scoping Plan Scenario, the majority of the reductions would result from continuation of the Cap-and-Trade regulation. Additional reductions are achieved from electricity sector standards (i.e., utility providers to supply 50 percent renewable electricity by 2030), doubling the energy efficiency savings at end uses, additional reductions from the LCFS, implementing the short-lived climate pollutant

[4] CARB, 2017. EMFAC2017: An update to California On-road Mobile Source Emission Inventory. June 1, 2017. Available at: https://ww3.arb.ca.gov/msei/downloads/emfac2017_workshop_june_1_2017_final.pdf. Accessed May 3, 2021.

[5] CARB, 2017b. The Advanced Clean Cars Program. Available online at: https://www.arb.ca.gov/msprog/acc/acc.htm. Accessed on June 24, 2019.

[6] Ibid.

strategy (e.g., hydrofluorocarbons), and implementing the mobile source strategy and sustainable freight action plan.

In the 2017 Climate Change Scoping Plan Update, CARB provides the estimated projected statewide 2030 emissions and the level of reductions necessary to achieve the 2030 target of 40 percent below 1990 levels. CARB's projected statewide 2030 emissions take into account 2020 GHG reduction policies and programs.

REGIONAL AND LOCAL

Connect SoCal: Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS)

On September 3, 2020, SCAG's Regional Council unanimously voted to approve and fully adopt the Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy). This long-range vision plan balances future mobility and housing needs with economic, environmental, and public health goals. The 2020 RTP/SCS aims at reducing GHG emissions per capita by 19 percent by 2035. Additionally, daily per capita vehicle miles traveled (VMT) in the SCAG region is projected to decrease in 2045 from 21.8 miles under the Baseline to 20.7 miles with Connect SoCal RTP/SCS.

City of Downey General Plan, Vision 2025

The Downey Vision 2025, the General Plan Update (DGP) from the City's 1992 General Plan, was adopted on January 25, 2005. Downey Vision 2025 provides a long-range policy guide to address changes to the City. The City of Downey policies do apply to the RLASCSP despite being County owned land. The City of Downey outlines building design considerations within the Conservation Chapter of Downey Vision 2025 that are applicable to the proposed Project as follows:

- Advanced programmable thermostat.
- Windows with high-performance, low-emission, double-pane glazing
- Ductwork installed inside the conditioned space to reduce cooling and heating losses to the exterior.
- A fluorescent-lighting system.
- High-efficiency appliances.
- A solar hot water pre-heating system.

Future development facilitated by the RLASCSP would incorporate design features to reduce emissions and contribute to energy efficiencies include the use of glass/window areas for ventilation and daylight accessibility, use of high-efficiency light bulbs and lighting fixtures, use of recyclable materials for flooring and devisable partitions in limited amounts, low albedo (high reflectivity) color paving to reduce heat island effect, and use of materials and finishes that emit low quantities of volatile organic compounds (VOCs). Other potential strategies include such items as stormwater retention, installation of heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants, installation of architectural building shading devices and/or plant shading, and green roofs, and include pre-wiring for solar photovoltaics.

4.5.4 SIGNIFICANCE CRITERIA AND THRESHOLDS

Appendix F of the CEQA Guidelines provides guidance for assessing energy impacts of projects. The appendix provides three goals:

- Decreasing overall per capita energy consumption;
- Decreasing reliance on natural gas and oil; and
- Increasing reliance on renewable energy sources.

State CEQA Guidelines Appendix G contains the Initial Study Checklist, which includes questions concerning energy. The questions presented in the Initial Study Checklist have been used as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation (Impact 4.5-1); or
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency. (Impact 4.5-2).

METHODOLOGY AND ASSUMPTIONS

The evaluation of potential impacts related to energy usage that may result from the construction and long-term operations of the Project has been conducted as described below.

Construction

This analysis of impacts on energy resources qualitatively discusses the future development projects facilitated by the RLASCSP temporary (i.e., construction) and permanent (i.e., operational) effects-based significance criteria/threshold's application, outlined above. The impact conclusions consider the potential for changes in environmental conditions, as well as compliance with the regulatory framework enacted to protect the environment.

Construction energy consumption would result primarily from transportation fuels (e.g., diesel and gasoline) used for haul trucks, heavy-duty construction equipment, and construction workers traveling to and from the Focus Area. Construction activities can vary substantially from day to day, depending on the specific type of construction activity and the number of workers and vendors traveling to the Focus Area. This analysis considers these factors and provides the estimated maximum construction energy consumption for the purposes of evaluating the associated impacts on energy resources.

Operations

Project operational activities would require energy in the form of electricity and natural gas for building heating, cooling, cooking, lighting, water demand and wastewater treatment, consumer electronics, and other energy needs, and transportation fuels, primarily gasoline, for vehicles traveling to and from the Focus Area.

The energy usage required for Project operations and routine and incidental maintenance activities is estimated based on the increase in energy demand from the new buildings. The energy usage would be

required to comply with building energy standards pursuant to the Title 24 Building Standards Code and CALGreen Code.

4.5.5 IMPACTS AND MITIGATION MEASURES

Impact 4.5-1: Would the project cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation?

Less than Significant.

CONSTRUCTION

Construction-related energy consumption associated with future developments facilitated by the RLASCSP would be subject to approval of permits prior to construction. Energy use during future construction would primarily occur in association with fuel use by vehicles and other equipment to conduct construction activities. Energy use would also occur from the burning of fuel by vehicles used by workers commuting to and from the future construction sites. Although the exact details of the future developments that could be constructed are presently unknown, there are no known conditions within the Focus Area that would require nonstandard equipment or construction practices that would be less energy-efficient than at comparable construction sites in the region or the state.

During construction, some incidental energy conservation would occur through compliance with state requirements that construction equipment not in use for more than five minutes be turned off. Construction equipment would also be required to comply with the latest Environmental Protection Agency and CARB engine emissions standards. These engines use highly efficient combustion engines to minimize unnecessary fuel consumption. Project-related construction activities would consume energy, primarily in the form of diesel fuel (e.g., mobile construction equipment) and electricity (e.g., power tools). Construction of any new housing development would be required to follow the City's Construction and Demolition Waste (C&D) Recycling Ordinance. Any future development facilitated by the RLASCSP and subject to CalGreen regulations is required to divert 65 percent of waste generated during construction from landfills. Recycling construction and demolition waste not only keeps it from being transported to the landfill, but also reduces the "upstream" energy consumption from the manufacturing of virgin material.

Future construction activities associated with future development would also be required to monitor air quality emissions using applicable regulatory guidance such as the South Coast AQMD CEQA Guidelines. This requirement indirectly relates to construction energy conservation because when air pollutant emissions are reduced as a result of monitoring and the efficient use of equipment and materials, this results in reduced energy consumption. There are no aspects of the RLASCSP that would foreseeably result in the inefficient, wasteful, or unnecessary consumption of energy during construction activities of future developments.

As discussed above, there are no unusual characteristics that would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or state. Therefore, it is expected that construction fuel consumption associated with the RLASCSP would not be any more inefficient, wasteful, or unnecessary than other similar projects of this nature. Therefore, impacts to energy resources associated with the future developments' construction activities would be less than significant, and no mitigation is required.

Transportation Energy Use

All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirement. Operational-related energy consumption associated with future residential and non-residential development would include building electricity, water, and natural gas usage, as well as fuel usage from on-road vehicles. Trips by individuals traveling to and from future development facilitated by the RLASCSP is anticipated to occur by walking, biking or through the use of passenger vehicles or public transit, especially in the TOD sub-district.

Passenger vehicles would be mostly powered by gasoline, with some fueled by diesel or electricity. Public transit would be powered by diesel or natural gas and could potentially be fueled by electricity. Any future development in the TOD district would have walking, bicycle, and public transit options that can reduce VMT.

When evaluating a long-range planning project such as the RLASCSP, it is speculative and not feasible to forecast the travel methods and gasoline use of future development. Rather, the more appropriate measure of estimating transportation-related energy use is to consider the distance traveled by vehicles associated with a proposed project. Therefore, this analysis is centered on the overall VMT associated with future development facilitated by the RLASCSP, which would be subject to the City's development review process, as detailed in Chapter 5 of the RLASCSP and would be required to demonstrate consistency with DGP policies and DMC requirements.

The RLASCSP aims to promote residential and commercial development with easy and accessible public transportation. The RLASCSP's facilitation of opportunities for access to alternative transportation modes would help reduce vehicle trips and automobile reliance, thereby reducing the transportation energy demand associated with the RLASCSP. Any future development facilitated by the RLASCSP would be required to comply with state and regional fuel efficiency requirements, including SB 32's Scoping Plan that includes a 50 percent reduction in petroleum use in vehicles and the 2020 Connect SoCal RTP/SCS provides strategies to reduce energy use and GHG emissions.

Therefore, RLASCSP implementation would not result in a substantial increase in transportation-related energy uses, such that it would result in a wasteful, inefficient, or unnecessary consumption of energy resources. Impacts concerning construction- and operations-related energy usage associated with future developments facilitated by the RLASCSP would not substantially affect existing energy or fuel supplies or resources. Impacts would be less than significant, and no mitigation is required.

Electricity and Natural Gas Usage

As future development facilitated by the RLASCSP occurs, future occupants of new buildings would use electricity and potentially natural gas to run various appliances and equipment, including water heaters, air conditioning and heating systems, ventilation equipment, lights, and numerous other devices. Generally, electricity use is higher in the warmer months due to increased air conditioning needs, and natural gas use is highest when the weather is colder because of high heating demand.

California's Energy Efficiency Standards for Residential Buildings create uniform building codes to reduce the state's energy consumption and provide energy efficiency standards for residential buildings. These standards are incorporated within the California Building Code and would be expected to substantially

reduce the growth in electricity and natural gas use. For example, requirements for energy-efficient lighting, heating and cooling systems and green building materials are expected to save additional electricity and natural gas. These savings are cumulative, doubling as years go by.

The California Public Utilities Commission adopted California's first Long-Term Energy Efficiency Strategic Plan, which reiterates the following four specific programmatic goals known as the "Big Bold Energy Efficiency Strategies" that were established by the CPUC in Decisions D.07-10-032 and D.07-12-051:

- All new residential construction will be ZNE by 2020.
- All new commercial construction will be ZNE by 2030.
- 50 percent of commercial buildings will be retrofit to ZNE by 2030.
- 50 percent of new major renovations of state buildings will be ZNE by 2025

In addition, the City of Downey has numerous policies and implementation programs that are focused on improving the sustainability of the City such as Downey Municipal Code Section 8150.02 which provides expedited solar permitting process for timely and cost-effective installations of small residential rooftop solar energy systems and Downey Municipal Code Section 8990 which adopted by reference the 2019 California Green Building Standards Code.

In addition to complying with federal, state, and local standards regulating energy consumption, any future development facilitated by the RLASCSP is also required to comply with Appendix F, Energy Conservation, of the State CEQA Guidelines. Specifically, Appendix F requires that EIRs include a discussion of potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. See below for RLASCSP Comparison to State CEQA Guidelines Appendix F.

Appendix F Consideration 1: The Project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.

Consistency: Energy use during construction of future facilitated by the RLASCSP would primarily involve gasoline and diesel fuel and would represent a short-term use of readily available resources. Potential construction impacts associated with any future development facilitated by the RLASCSP would be less than significant, and no mitigation is required. Operational energy demand of future development facilitated by the RLASCSP includes natural gas and electricity. Future development facilitated by the RLASCSP would result in additional electricity and natural gas use. That development would be required to meet or exceed the provisions included in the California Energy Code Building Energy Efficiency Standards (CCR Title 24, Part 6) and the CALGreen Code (CCR Title 24, Part 11). Additionally, because future development facilitated by the RLASCSP has not been designed or proposed at this time, site-specific details related to energy and natural gas facilities would be identified and evaluated at the time future developments are considered. Therefore, with adherence to Title 24 regulations and the policies included in the City's General Plan, the RLASCSP would be considered consistent with this requirement for consideration of future energy use and efficiencies.

Appendix F Consideration 2: The degree to which the project complies with existing energy standards.

Consistency: All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including objectives and policies aimed at reducing energy consumption. Future development would also be required to meet or exceed the provisions included in the California Energy Code Building Energy Efficiency Standards (CCR Title 24, Part 6) and the CALGreen Code (CCR Title 24, Part 11). For example, future housing developments facilitated by the RLASCSP would be required to comply with the Building Energy Efficiency Standards for Residential and Non-Residential Buildings that are in place at the time new development is proposed. These standards are updated by the state every three years, with the latest update (2019) having gone into effect on January 1, 2020. Therefore, the RLASCSP is considered consistent with this item.

Conclusion

Any future housing development facilitated by the RLASCSP would be required to adhere to all federal, state, and local requirements for energy efficiency, including the latest Title 24 standards. Considering these requirements, the RLASCSP would not result in the inefficient, wasteful, or unnecessary consumption of building energy. Therefore, impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.5-2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate compliance with the CALGreen Code (CCR Title 24, Part 11) and the California Energy Code (CCR Title 24, Part 6), which includes provisions related to insulation and design aimed at minimizing energy consumption. All future projects would be required to demonstrate consistency with DGP policies and DMC requirements, including those intended to reduce energy consumption.

In addition, the RLASCSP aims to promote TOD by allowing residential and commercial land uses closer to easily accessible public transportation options. Facilitating new housing development in locations with access to alternative transportation modes would reduce vehicle trips and automobile reliance, thereby reducing the transportation energy demand in the RLASCSP area. As noted, all future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to comply with federal, state, and local regulations aimed at reducing energy consumption. In addition, the DMC adopts by reference federal and state energy regulations, such as the California Energy Code Building Energy Efficiency Standards (CCR Title 24, Part 6), the CALGreen Code (CCR Title 24, Part 11), and SB 743 transportation-related impact analysis requirements would also be imposed through the City's development review process to minimize future energy consumption. Therefore, future development facilitated by the RLASCSP would be required to be consistent with applicable federal, state, and local laws, policies, and regulations related to renewable energy and energy efficiency, and no mitigation would be required.

Mitigation Measures

No mitigation is required.

4.5.6 CUMULATIVE IMPACTS

Construction and operations associated with implementation of the Project would result in the use of energy, but not in a wasteful manner. The use of energy would not be substantial in comparison to statewide electricity, natural gas, gasoline, and diesel demand. New capacity or supplies of energy resources would not be required. Additionally, the Project would be subject to compliance with all federal, state, and local requirements for energy efficiency.

The Project and new development projects located within the cumulative study area would also be required to comply with all the same applicable federal, state, and local measures aimed at reducing fossil fuel consumption and the conservation of energy. The anticipated Project impacts, in conjunction with cumulative development in the vicinity, would increase urbanization and result in increased energy use. Potential land use impacts are site-specific and require evaluation on a case-by-case basis. As noted above, the Project would not result in significant impacts to state or local plans for renewable energy or energy efficiency. Therefore, the Project and identified cumulative projects are not anticipated to result in a significant cumulative impact. Therefore, potential impacts are considered less than cumulatively considerable.

4.5.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable energy impacts have been identified.

4.5.8 REFERENCES

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4.6 GREENHOUSE GAS EMISSIONS

4.6.1 INTRODUCTION

This section addresses greenhouse gas (GHG) emissions generated by the construction and operation of the Project inclusive of mandatory and voluntary energy and resource conservation measures that have been incorporated into the proposed Project to reduce GHG emissions and associated impacts. The analysis also addresses the consistency of the Project with applicable regulations, plans, and policies set forth by the State of California and the City to reduce GHGs. The Project's potential contributions to global climate change impacts are identified.

This PEIR section relies upon and incorporates by reference in its entirety the County of Los Angeles Rancho Los Amigos South Campus Project EIR (County Project EIR) Section 3.7 Greenhouse Gas Emissions. The analysis conducted for the County Project EIR included a portion of the Focus Area and is representative of general site conditions throughout the South Campus. That EIR and the detailed studies therein adequately address the potentially occurring GHG emissions present within the RLASP, and all mitigation strategies are applicable.

4.6.2 AFFECTED ENVIRONMENT

The Specific Plan area currently includes a mix of newer and aging industrial and institutional structures traversed by a defined roadway network in an urban setting. Approximately 193,900 square feet (SF) of existing buildings are vacant, and 93,900 SF of existing buildings are occupied. The occupied Focus Area buildings include a Los Angeles County Public Works facility and storage yard and Los Angeles County Animal Shelter buildings located beyond the Union Pacific Railroad corridor. The proposed Project assumes all construction and operational emissions are net new and no discounts from existing emissions have been taken.

Certain gases in the earth's atmosphere classified as GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the earth's surface and a smaller portion of this radiation is reflected toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

The primary GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change. Examples of fluorinated gases include chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3); however, it is noted that these gases are not associated with typical land use development. Human-caused emissions of GHGs exceeding natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the Earth's climate, known as global climate change or global warming.

GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (approximately one day), GHGs have long atmospheric lifetimes (one to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of a GHG molecule is dependent on multiple variables and cannot be pinpointed, more CO_2 is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, or other forms of carbon sequestration. Of the total annual human-caused CO_2 emissions, approximately 55 percent is sequestered through ocean and land uptakes every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO_2 emissions remains stored in the atmosphere.[1]

Scientists have established a Global Warming Potential (GWP) to gauge the potency of each GHG's ability to absorb and re-emit long-wave radiation and these GWP ratios are available from the IPCC. The GWP of a gas is determined using CO_2 as the reference gas with a GWP of 1 over 100 years. For example, a gas with a GWP of 10 is 10 times more potent than CO_2 over 100 years. The sum of each GHG multiplied by its associated GWP is referred to as carbon dioxide equivalents (CO_2e). The measurement unit CO_2e is used to report the combined potency of GHG emissions.

Carbon Dioxide (CO_2): CO_2 is the most abundant GHG in the atmosphere and is primarily generated from fossil fuel combustion from stationary and mobile sources. CO_2 is the reference gas (GWP of 1) for determining the GWPs of other GHGs.

Methane (CH_4): CH_4 is emitted from biogenic sources (i.e., resulting from the activity of living organisms), incomplete combustion in forest fires, landfills, manure management, and leaks in natural gas pipelines. The GWP of CH4 is 21 in the IPCC SAR, 25 in the IPCC AR4, and 28 in the IPCC AR5.

Nitrous Oxide (N_2O): N_2O produced by human-related sources including agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuel, adipic acid production, and nitric acid production. The GWP of N_2O is 310 in the IPCC SAR, 298 in the IPCC AR4, and 265 in the IPCC AR5.

Hydrofluorocarbons (HFCs): HFCs are fluorinated compounds consisting of hydrogen, carbon, and fluorine. They are typically used as refrigerants in both stationary refrigeration and mobile air conditioning systems. The GWPs of HFCs ranges from 140 for HFC-152a to 11,700 for HFC-23 in the IPCC SAR, 124 for HFC-152a to 14,800 for HFC-23 in the IPCC AR4, and 138 for HFC-152a to 12,400 for HFC-23 in the IPCC AR5.

Perfluorocarbons (PFCs): PFCs are fluorinated compounds consisting of carbon and fluorine. They are primarily created as a byproduct of aluminum production and semiconductor manufacturing. The GWPs of PFCs range from 6,500 to 9,200 in the IPCC SAR, 7,390 to 17,700 in the IPCC AR4, and 6,630 to 17,400 in the IPCC AR5.

Sulfur Hexafluoride (SF_6): SF6 is a fluorinated compound consisting of sulfur and fluoride. It is a colorless, odorless, nontoxic, nonflammable gas. It is most commonly used as an electrical insulator in high voltage

[1] Intergovernmental Panel on Climate Change (IPCC), *Fifth Assessment Report, Summary for Policy Makers*, pg. 15, 2013.

equipment that transmits and distributes electricity. SF_6 has a GWP of 23,900 in the IPCC SAR, 22,800 in the IPCC AR4, and 23,500 in the IPCC AR5.

The California Air Resources Board (CARB) compiles the state's GHG emissions inventory. The most updated inventory is referred to as the 2020 edition, which reports the state's GHG emissions inventory from calendar year 2018. Based on the 2018 GHG inventory data (i.e., the latest year for which data are available from CARB), California emitted 425 million metric tons of CO_2e ($MMTCO_2e$) including emissions resulting from imported electrical power. Per capita, GHG emissions in California have dropped from a 2001 peak of 14.0 metric tons per person to 10.7 metric tons per person in 2018, a 24 percent decrease. From 2000 to 2018, the carbon intensity of California's economy decreased by 43 percent while the gross domestic product (GDP) increased by 59 percent. In 2018, GDP grew 4.3 percent while the emissions per GDP declined by 0.4 percent compared to 2017.[2] According to CARB, 2018 GHG emissions from statewide emitting activities were 1.0 $MMTCO_2e$ higher than 2017 levels and 6 $MMTCO_2e$ below the 2020 GHG Limit of 431 $MMTCO_2e$. Since the peak level in 2004, California's GHG emissions have generally followed a decreasing trend. In 2016, statewide GHG emissions dropped below the 2020 GHG Limit and have remained below the Limit since that time. California met 2020 GHG reduction target codified in California Health and Safety Code (HSC), Division 25.5, also known as The Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32) as demonstrated by the declining trend coupled with implementation of the state's GHG reduction programs (such as the Renewables Portfolio Standard (RPS), Low Carbon Fuel Standard (LCFS), vehicle efficiency standards, and declining caps under the Cap and Trade Program). The transportation sector is the largest contributor to statewide GHG emissions at 40 percent in 2018.

4.6.3 REGULATORY SETTING

FEDERAL

United States Environmental Protection Agency

The U.S. Environmental Protection Agency (U.S. EPA) is responsible for implementing federal policy to address global climate change. The federal government administers a wide array of public-private partnerships to reduce the GHG intensity generated by the U.S. These programs focus on energy efficiency, renewable energy, methane and other non-CO_2 gases, agricultural practices, and implementation of technologies to achieve GHG reductions. The U.S. EPA implements several voluntary programs that substantially contribute to the reduction of GHG emissions. All of these programs play a significant role in encouraging voluntary reductions from large corporations, consumers, industrial and commercial buildings, and many major industrial sectors.

- The State Climate and Energy Partner Network that allows for the exchange of information between federal and state agencies regarding climate and energy,
- The Climate Leaders program for companies,
- The Energy Star labeling system for energy-efficient products, and
- The Green Power Partnership for organizations interested in buying green power.

[2] California Air Resources Board, *2020 Edition, California Greenhouse Gas Emission Inventory: 2000 – 2018*, 2020.

Light Duty Vehicle GHG and Fuel Efficiency Standards

In August 2012, the U.S. EPA and U.S. Department of Transportation (U.S. DOT) adopted standards for model year 2017 through 2025 for passenger cars and light-duty trucks. By 2020, vehicles are required to achieve a combined standard of 41.7 mpg and 213 grams of CO_2 per mile. By 2025, vehicles are required to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of CO_2 per mile. According to the U.S. EPA, a model year 2025 vehicle would emit one-half of the GHG emissions from a model year 2010 vehicle.3 In 2017, the U.S. EPA recommended no change to the GHG standards for light-duty vehicles for model years 2022-2025. On April 2, 2018, the U.S. EPA Administrator signed the Mid-term Evaluation Final Determination that finds that the model year 2022-2025 GHG standards are not appropriate in light of the record before EPA and, therefore, should be revised. While not a final U.S. EPA action, the Mid-term Evaluation Final Determination initiates a rulemaking process whose outcome will be the final agency action, however until that rulemaking has been completed, the current standards remain in effect.4

On August 2, 2018, U.S. EPA and the National Highway Traffic Safety Administration (NHTSA) proposed the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule to amend the existing CAFE and tailpipe CO_2 emissions standards for passenger cars and light trucks and to establish new standards covering model years 2021 through 2026. On March 31, 2020, U.S. EPA and NHTSA issued the SAFE Vehicles Rule, setting fuel economy and CO_2 standards that increase 1.5 percent in stringency each year from model years 2021 through 2026.

Heavy-Duty Engines and Vehicles Fuel Efficiency Standards

On October 25, 2010, the U.S. EPA and the U.S. DOT proposed the first national standards to reduce GHG and improve fuel efficiency of heavy-duty trucks and buses (also known as "Phase 1"). For combination tractors, the agencies proposed engine and vehicle standards that begin in the 2014 model year and achieve up to a 20 percent reduction in carbon dioxide emissions and fuel consumption by the 2018 model year. For heavy-duty pickup trucks and vans, the agencies proposed separate gasoline and diesel truck standards, which phase in starting in the 2014 model year and achieve up to a 10 percent reduction for gasoline vehicles and up to a 15 percent reduction for diesel vehicles by 2018 model year (12 percent and 17 percent, respectively, if accounting for air conditioning leakage). Lastly, for vocational vehicles (includes other vehicles like buses, refuse trucks, concrete mixers; everything except for combination tractors and heavy-duty pickups and vans), the agencies proposed engine and vehicle standards starting in the 2014 model year, which would achieve up to a 10 percent reduction in fuel consumption and carbon dioxide emissions by the 2018 model year. Building on the success of the standards, the U.S. EPA and U.S. DOT jointly finalized additional standards (called "Phase 2") for medium- and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons.

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[3] U.S. EPA, *EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks*, 2012. Available online at: https://nepis.epa.gov/Exe/ZyPDF.cgi/P100EZ7C.PDF?Dockey=P100EZ7C.PDF. Accessed May 26, 2021.

[4] U.S. EPA, *Mid-Term Evaluation of Greenhouse Gas Emissions Standards for Model Year 2022-2025 Light-Duty Vehicles, 83 Fed. Reg. 16077*, 2018. Available online at: https://www.gpo.gov/fdsys/pkg/FR-2018-04-13/pdf/2018-07364.pdf. Accessed May 26, 2021.

STATE

California Air Resources Board (CARB)

CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, CARB conducts research, sets state ambient air quality standards (California Ambient Air Quality Standards [CAAQS]), compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

In 2004, CARB adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other toxic air contaminants (Title 13 California Code of Regulations [CCR], §2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure generally does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given location with certain exemptions for equipment in which idling is a necessary function such as concrete trucks. While this measure primarily targets diesel particulate matter emissions, it has co-benefits of minimizing GHG emissions from unnecessary truck idling.

On July 26, 2007, CARB adopted emission standards for off-road diesel construction equipment of greater than 25 horsepower such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. This regulation aims to reduce emissions by installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Additionally, in 2008, CARB approved the Truck and Bus regulation to reduce particulate matter and nitrogen oxide emissions from existing diesel vehicles operating in California (13 CCR, §2025, subsection (h)). In April 2014, amendments to the Truck and Bus Regulation were approved by CARB to help ensure that the air quality benefits originally envisioned by the regulation will be achieved, by providing some additional compliance flexibility and options to vehicle owners (CARB, 2014). Refer to **Section 3.2: Air Quality** (see specifically Section 3.2.2), of this PEIR for additional details regarding these regulations. While these regulations primarily target reductions in criteria air pollutant emission, they have co-benefits of minimizing GHG emissions due to improved engine efficiencies.

Executive Order S-3-05

On June 1, 2005, Governor Arnold Schwarzenegger signed Executive Order S-3-05, which proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce snowpack in the Sierra Nevada Mountains; could further exacerbate California's air quality problems; and could potentially cause a rise in sea levels. In an effort to avoid or reduce the impacts of climate change, Executive Order S-3-05 calls for a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. Executive Orders are binding on state agencies only.

Assembly Bill 32

In 2006, the California State Legislature adopted Assembly Bill (AB) 32 (codified in the California Health and Safety Code [HSC], Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. HSC Division 25.5 defines GHGs as CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6 and represents the first enforceable statewide program to limit emissions of these GHGs from all major industries with penalties for noncompliance. The law further requires that reduction measures be technologically feasible and cost-effective. Under HSC Division 25.5, CARB has the primary responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing state actions that would achieve GHG emissions reductions equivalent to 1990 statewide levels by 2020.

2008 Climate Change Scoping Plan

A specific requirement of AB 32 was to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020 (HSC §38561 (h)). CARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap.[5] The initial scoping plan was approved in 2008, and contained a mix of recommended strategies that combined direct regulations, market-based approaches, voluntary measures, policies, and other emission reduction programs calculated to meet the 2020 statewide GHG emission limit and initiate the transformations needed to achieve the state's long-range climate objectives.[6]

2014 Scoping Plan Update

The first update to the Scoping Plan was approved by CARB in May 2014 and built upon the initial Scoping Plan with new strategies and recommendations.[7] As required by HSC Division 25.5, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions limit for 2020. CARB also updated the state's projected 2020 emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions required by regulation that were recently adopted for motor vehicles and renewable energy.

Senate Bill 32

In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197, and both were signed by then-Governor Edmund G. Brown Jr. SB 32 and AB 197 amend HSC Division 25.5, establish a new GHG reduction target of 40 percent below 1990 levels by 2030, and include provisions to ensure the benefits of state climate policies reach into disadvantaged communities.

2017 Climate Change Scoping Plan

CARB adopted the 2017 Climate Change Scoping Plan in December 2017 (CARB, 2017b). The 2017 Scoping Plan outlines the strategies the state will implement to achieve the 2030 GHG reduction target of 40 percent below 1990 levels by 2030 established by SB 32. The 2017 Scoping Plan is also intended to "substantially advance" toward the EO S-3-05 2050 climate goal to reduce GHG emissions by 80 percent below 1990 levels by 2050.

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[5] CARB, *Climate Change Scoping Plan*, 2008.

[6] Ibid.

[7] CARB, *First Update to the Climate Change Scoping Plan*, May 2014.

The 2017 Scoping Plan builds on the Cap-and-Trade Regulation, the Low Carbon Fuel Standard (LCFS), improved vehicle, truck and freight movement emissions standards, increasing renewable energy, and strategies to reduce methane emissions from agricultural and other wastes by using it to meet our energy needs. The 2017 Scoping Plan also comprehensively addresses GHG emissions from natural and working lands of California, including the agriculture and forestry sectors. The 2017 Scoping Plan considered a number of different alternatives to achieve the 2030 GHG reduction goal. The "Scoping Plan Scenario" was ultimately adopted and relies on the continuation of ongoing and statutorily required programs and continuation of the Cap-and-Trade Program. The Scoping Plan Scenario was modified from the January 2017 Proposed Scoping Plan to reflect AB 398, including removal of the 20 percent GHG reduction measure for refineries (CARB, 2017b).

CARB states that the Scoping Plan Scenario "is the best choice to achieve the state's climate and clean air goals."[8] Under the Scoping Plan Scenario, the majority of the reductions would result from continuation of the Cap-and-Trade Regulation. Additional reductions are achieved from electricity sector standards (i.e., utility providers to supply 50 percent renewable electricity by 2030), doubling the energy efficiency savings at end uses, additional reductions from the LCFS, implementing the short-lived climate pollutant strategy (e.g., hydrofluorocarbons), and implementing the mobile source strategy and sustainable freight action plan.

In the 2017 Climate Change Scoping Plan Update, CARB provides the estimated projected statewide 2030 emissions and the level of reductions necessary to achieve the 2030 target of 40 percent below 1990 levels. CARB's projected statewide 2030 emissions take into account 2020 GHG reduction policies and programs.

Cap-and-Trade Program

The Climate Change Scoping Plan identifies a Cap-and-Trade Program as a key strategy CARB will employ to help California meet its GHG reduction targets for 2020 and 2030, and ultimately achieve an 80 percent reduction from 1990 levels by 2050. Pursuant to its authority under HSC Division 25.5, CARB designed and adopted a California Cap-and-Trade Program to reduce GHG emissions from major sources (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve the state's emission-reduction mandate of returning to 1990 levels of emissions by 2020 and 40 percent below 1990 levels by 2030 (17 CCR §§95800 to 96023). Under the Cap-and-Trade Program, an overall limit is established for GHG emissions from capped sectors (e.g., electricity generation, petroleum refining, cement production, and large industrial facilities that emit more than 25,000 metric tons CO_2e per year), caps decline over time, and facilities subject to the cap can trade permits to emit GHGs. The statewide cap for GHG emissions from the capped sectors commenced in 2013 and declines over time, achieving GHG emission reductions throughout the Program's duration (17 CCR §§95800 to 96023). On July 17, 2017 the California legislature passed AB 398, extending the Cap-and-Trade program through 2030.

The Cap-and-Trade Regulation provides a firm cap, ensuring that the 2020 statewide emission limit will not be exceeded. An inherent feature of the Cap-and-Trade Program is that it does not guarantee GHG

[8] CARB, *California's 2017 Climate Change Scoping Plan*, 2017.

emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on a statewide basis.

If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. In other words, the Cap-and-Trade Program functions similarly to an insurance policy for meeting California's GHG emissions reduction mandates.

Transportation Sector

AB 1493, enacted on July 22, 2002, required the CARB to develop and adopt regulations that reduce emissions from passenger vehicles and light-duty trucks. The standards phased in during the 2009 through 2016 model years. The near term (2009–2012) standards were expected to result in about a 22 percent reduction compared with the 2002 fleet, and the mid-term (2013–2016) standards were expected to result in about a 30 percent reduction. Several technologies stand out as providing significant reductions in emissions at favorable costs. These include discrete variable valve lift or camless valve actuation to optimize valve operation rather than relying on fixed valve timing and lift as has historically been done; turbocharging to boost power and allow for engine downsizing; improved multi-speed transmissions; and improved air conditioning systems that operate optimally, leak less, and/or use an alternative refrigerant.

In January 2012, CARB approved the Advanced Clean Cars program, a new emissions-control program for model years 2015 through 2025. The program includes components to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars. The zero-emissions vehicle (ZEV) program will act as the focused technology of the Advanced Clean Cars program by requiring manufacturers to produce increasing numbers of ZEVs and plug-in hybrid electric vehicles (PHEV) in the 2018 to 2025 model years.[9]

In May 2016, CARB released the updated Mobile Source Strategy that demonstrates how the state can simultaneously meet air quality standards, achieve GHG emission reduction targets, decrease health risk from transportation emissions, and reduce petroleum consumption over the next fifteen years, through a transition to zero-emission vehicles (ZEVs), cleaner transit systems and reduction of vehicle miles traveled. The Mobile Source Strategy calls for 1.5 million ZEVs (including plug-in hybrid electric, battery-electric, and hydrogen fuel cell vehicles) by 2025 and 4.2 million ZEVs by 2030. It also calls for more stringent GHG requirements for light-duty vehicles beyond 2025 as well as GHG reductions from medium-duty and heavy-duty vehicles and increased deployment of zero-emission trucks primarily for class 3 – 7 "last mile" delivery trucks in California. Statewide, the Mobile Source Strategy would result in a 45 percent reduction in GHG emissions, and a 50 percent reduction in the consumption of petroleum-based fuels.

Low Carbon Fuel Standard (LCFS) regulations were approved by CARB in 2009 and established a reduction in the carbon intensity of transportation fuels by 10 percent by 2020 with implementation beginning on January 1, 2011. In September 2015, CARB approved the re-adoption of the LCFS, which became effective on January 1, 2016. In 2018, CARB approved amendments to the carbon intensity benchmarks through 2030, consistent with SB 32.

[9] CARB, Short-Lived Climate Pollutant Reduction Strategy, March 2017. Available online at: https://www.arb.ca.gov/cc/shortlived/meetings/03142017/final_slcp_report.pdf. Accessed May 26, 2021.

Land Use and Transportation Planning

SB 375 (Chapter 728, Statutes of 2008), which establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions, was adopted by the state on September 30, 2008. Under SB 375, CARB is required, in consultation with the state's Metropolitan Planning Organizations (MPOs), to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. In February 2011, CARB adopted the final GHG emissions reduction targets for the state's MPOs, including the Southern California Association of Governments (SCAG), which is the MPO for the region in which the City of Downey (City) is located; CARB updated these targets in 2018. Of note, the reduction targets explicitly exclude emission reductions expected from the AB 1493 and the low carbon fuel standard regulations.

SB 375 requires MPOs such as SCAG to incorporate a "sustainable communities strategy" (SCS) in their regional transportation plans (RTPs) that will achieve GHG emission reduction targets set by CARB. Certain transportation planning and programming activities would then need to be consistent with the Connect SoCal. However, SB 375 expressly provides that the SCS does not regulate the use of land, and further provides that local land use plans and policies (e.g., general plan) are not required to be consistent with either the RTP or SCS.

Energy Sector

The California Energy Commission first adopted Energy Efficiency Standards for Residential and Non-residential Buildings (CCR, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the state. Although not originally intended to reduce GHG emissions, increased energy efficiency and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and non-residential buildings subject to the standard. The standards are updated periodically (typically every three years) to allow for the consideration and inclusion of new energy efficiency technologies and methods.

Part 11 of the Title 24 Building Energy Efficiency Standards is referred to as the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality" (California Building Standards Commission, 2010). The CALGreen Code was updated in 2016 to include new mandatory measures for residential and non-residential uses including energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The new measures took effect on January 1, 2017. The CALGreen code was most recently updated in 2018, to go through final approval at the end of 2018, with new measures taking effect on January 1, 2020.

On April 12, 2011, Governor Jerry Brown signed SB X1-2 to increase California's Renewables Portfolio Standard to 33 percent by 2020. SB 350 (Chapter 547, Statues of 2015) further increased the Renewables Portfolio Standard to 50 percent by 2030. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027.

In September 2018, Governor Jerry Brown signed SB 100, which is now known as the 100 Percent Clean Energy Act of 2018. The Act declares that CARB should plan for 100 percent total retail sales of electricity in California come from eligible renewable energy resources and zero-carbon resources by December 31, 2045. SB 100 also set interim goals, accelerating the RPS, to 50 percent from renewable energy sources by 2026 and 60 percent by 2030.

Executive Order B-55-18

On September 10, 2018, then-Governor Brown signed EO B-55-18. This Executive Order sets a new statewide goal to achieve carbon neutrality no later than 2045 and achieve and maintain net negative emissions thereafter. This goal is in addition to existing statewide GHG reduction targets.

Senate Bill 1383

SB 1383 (Chapter 395, Statutes of 2016) creates goals for short-lived climate pollutant (SLCP) reductions in various industry sectors. The SLCPs included under this bill – including methane, fluorinated gases, and black carbon – are GHGs that are much more potent than carbon dioxide and can have detrimental effects on human health and climate change. SB 1383 requires the CARB to adopt a strategy to reduce methane by 40 percent, hydrofluorocarbon gases by 40 percent, and anthropogenic black carbon by 50 percent below 2013 levels by 2030. The methane emission reduction goals include a 75 percent reduction in the level of statewide disposal of organic waste from 2014 levels by 2025. In 2017, CARB adopted a SLCP Reduction Strategy to implement SB 1383.[10]

REGIONAL AND LOCAL

South Coast Air Quality Management District

The City of Downey, inclusive of the Focus Area is located in the South Coast Air Basin (Air Basin), which consists of Orange County, Los Angeles County (excluding the Antelope Valley portion), and the western, non-desert portions of San Bernardino and Riverside counties, in addition to the San Gorgonio Pass area in Riverside County. The South Coast Air Quality Management District (SCAQMD) is responsible for air quality planning in the Air Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

In 2008, the SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds[11]. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where the SCAQMD is Lead Agency. However, the SCAQMD has not adopted a GHG significance threshold for land use development projects (e.g., mixed-use/commercial projects). A GHG Significance Threshold Working Group was formed to further evaluate potential GHG significance thresholds. The aforementioned Working Group has been

[10] CARB, Short-Lived Climate Pollutant Reduction Strategy, March 2017. Available online at: https://www.arb.ca.gov/cc/shortlived/meetings/03142017/final_slcp_report.pdf. Accessed May 26, 2021.

[11] SCAQMD. 2008. *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*. Available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf

inactive since 2011 and the SCAQMD has not formally adopted any GHG significance thresholds for land use development projects.

Connect SoCal: SCAG Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, SCAG's Regional Council unanimously voted to approve and fully adopt Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy). Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It considers the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future, identifying regional transportation strategies to address mobility needs.

Connect SoCal describes how the region can exceed the GHG emission-reduction targets set by CARB by achieving an 8 percent reduction by 2020, and a 19 percent reduction by 2035 compared to the 2005 level on a per capita basis. Compliance with and implementation of Connect SoCal policies and strategies would not only reduce GHG emissions from vehicle emissions that include CO_2, CH_4 and N_2O that come as a result of burning petroleum-based fuels, but also have co-benefits of reducing per capita emissions associated with reduced per capita vehicle miles traveled (VMT).

To reach the reduction target set by CARB mentioned above, SCAG's Connect SoCal provides specific strategies for successful implementation. These strategies include supporting projects that encourage a diverse job opportunities for a variety of skills and education, recreation and cultures and a full range of shopping, entertainment and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the implementation of a "Complete Streets" policy that meets the needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, electric vehicles, movers of commercial goods, pedestrians, users of public transportation, and seniors; and supporting alternative fueled vehicles.

In addition, Connect SoCal includes new strategies to promote active transportation, supports local planning and projects that serve short trips, expand understanding and consideration of public health in the development of local plans and projects, and supports improvements in sidewalk quality, local bike networks, and neighborhood mobility areas. It also proposes increasing access to the California Coast Trail, light rail and bus stations, and promoting corridors that support biking and walking, such as through a regional greenway network and local bike networks. The Connect SoCal proposes to better align active transportation investments with land use and transportation strategies, increase competitiveness of local agencies for federal and state funding, and to expand the potential for all people to use active transportation. CARB has accepted the SCAG GHG quantification determination in the Connect SoCal.

CITY OF DOWNEY

City of Downey General Plan Vision 2025

The Downey Vision 2025 General Plan (DGP) was adopted on January 25, 2005. Downey Vision 2025 provides a long-range policy guide to address changes to the City. Building design considerations in the Conservation Chapter of the DGP that are applicable to the proposed Project are as follows:

- Advanced programmable thermostat

- Windows with high-performance, low-emission, double-pane glazing
- Ductwork installed inside the conditioned space to reduce cooling and heating losses to the exterior
- A fluorescent-lighting system
- High-efficiency appliances
- A solar hot water pre-heating system

4.6.4 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G contains the Initial Study Checklist, which includes questions concerning GHG emissions. The questions presented in the Initial Study Checklist have been used as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment (Impact 4.6-1); and/or
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases (Impact 4.6-2).

METHODOLOGY AND ASSUMPTIONS

State CEQA Guidelines §15064.4 was amended to assist lead agencies in determining the significance of the impacts of GHG emissions. Section 15064.4 gives lead agencies the discretion to determine whether to assess those emissions quantitatively and/or qualitatively. This section recommends certain factors that should be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for reduction or mitigation of GHGs). The amendments do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies, or suggested by other experts, such as CAPCOA, so long as any threshold chosen is supported by substantial evidence (see Guidelines §15064.7(c)).

The California Natural Resources Agency has also clarified that the State CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and that they should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see §15064(h)(3)).[12]

Although GHG emissions can be quantified as discussed above, the CARB, SCAQMD, and the City have not adopted quantitative project-level significance thresholds for GHG emissions that would be applicable to the Project. The Governor's Office of Planning and Research (OPR) released a Discussion Draft: CEQA and Climate Change Advisory in December 2018 to provide updates and regulatory changes to a prior 2008 climate change advisory. The discussion draft addresses project-level analyses of GHG impacts and recognizes, "lead agency discretion in determining the appropriate methodologies, thresholds, and if

[12] CNRA, *Final Statement of Reasons for Regulatory Action*, pages 11-13, 14, and 16, 2009.

necessary, mitigation measures." Furthermore, the discussion draft explains that significance thresholds may be based on efficiency metrics, compliance with state goals and percentage reduction from BAU emissions, consistency with relevant regulations, plans, policies, and regulatory programs, or an absolute numerical/quantitative threshold.[13]

Per State CEQA Guidelines §15064.4(b), "in determining the significance of a project's GHG emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions." When determining the significance of GHG impacts, lead agencies should consider the project's impact as compared to the existing environmental setting, whether the project exceeds a threshold of significance, and compliance with relevant GHG-related plans (see, e.g., State CEQA Guidelines §15064.4(b)). Regarding the latter criterion, lead agencies should consider "the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (see, e.g., State CEQA Guidelines §15183.5(b)). Per State CEQA Guidelines §15064.4(b)(3), such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of GHG emissions.

4.6.5 IMPACTS AND MITIGATION MEASURES

Impact 4.6-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Significant and Unavoidable. Because of the global nature of climate change, it is generally the case that an individual project is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. GHG impacts are recognized as cumulative impacts. Often, estimates of GHG emissions are presented in CO_2e, which weighs each gas by its global warming potential. Expressing GHG emissions in CO_2e takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted.

While the Project would not result in direct construction of residential or non-residential uses but would facilitate and provide a policy framework for future development within the Specific Plan area. Although the Project does not propose any development, it can be assumed that future development could potentially result in direct GHG impacts through the physical demolition of existing structures and construction of new buildings within the Focus Area. Future construction of development within the Focus Area would generate temporary GHG emissions primarily due to the operation of construction equipment and truck trips. Site preparation and grading typically generate the greatest amount of emissions due to the use of grading equipment and soil hauling. Future project construction would involve on-site activities and region-wide mobilization of numerous equipment and personnel. The activity would cause short-term, unavoidable increases in GHG emissions from vehicles and equipment.

[13] Office of Planning and Research. December 2018. *Discussion Draft CEQA and Climate Change Advisory*. Available at: https://opr.ca.gov/docs/20181228-Discussion_Draft_Climate_Change_Adivsory.pdf

Construction activities associated with future development would occur in incremental phases over time based upon numerous factors, including market demand, and economic and planning considerations. Construction activities would consist of grading, demolition, excavation, cut-and-fill, paving, building construction, and application of architectural coatings. In addition, construction worker vehicle trips, building material deliveries, soil hauling, etc., would occur during construction. Construction-related emissions are typically site-specific and depend upon multiple variables. Quantifying individual future development's air emissions from short-term, temporary construction-related activities is not possible due to project-level variability and uncertainties concerning locations, detailed site plans, construction schedules/duration, equipment requirements, etc., among other factors, which are presently unknown. Since these parameters can vary so widely (and individual project-related construction activities would occur over time dependent upon numerous factors), quantifying precise construction-related emissions and impacts would be speculative. For discretionary projects, project-specific analysis and mitigation may be required for future development projects within the RLASCSP.

Operational emissions related to the project include area sources, including consumer products, landscape maintenance, and architectural coatings; emissions from waste, emissions from water and wastewater use, and mobile source. Mobile sources such as total daily trips would vary depending on the type, size, and phasing of future development.

As GHG emissions will ultimately be guided by future state legislative actions, operational emissions generated by RLASCSP implementation were also qualitatively evaluated based on the potential to demonstrate compliance with the long-term state reduction targets. Development that would occur under full buildout (new development) of the Specific Plan was assessed based on the capacity to effectively reduce sources of GHG emissions from the operation of developments within the Specific Plan area.

Further, development within the Focus area would locate a mix of residential, commercial and retail uses proximate to nearby public transportation. The RLASCSP proposes the future Gardendale Metro Station stop to be located in the Focus Area, along the southern boundary of the Specific Plan area where the rail line meets Gardendale Street. The Gardendale Station would be 1 of 13 proposed stops along the West Santa Ana Branch (WSAB) Transit Corridor, which is a 20-mile long light rail transit line connecting downtown Los Angeles to southeast Los Angeles County. Increased use of public transportation, walking, and biking would help reduce mobile GHG emissions from vehicle trips.

Any future development facilitated by the RLASCSP would be required to adhere to all federal, state, and local requirements for energy efficiency, including the latest Title 24 standards. It should also be noted that the project design and materials would comply with the 2019 Building Energy Efficiency Standards, which took effect on January 1, 2020. Prior to issuance of a building permit, the City would review and verify that the project plans demonstrate compliance with the current version of the Building and Energy Efficiency Standards. The project would also be required adhere to the provisions of CALGreen, which establishes planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.

Currently, there are no specific development proposals associated with the proposed Project. Therefore, the degree and extent of future project compliance with GHG thresholds and the Project details necessary

to calculate emission reductions are not available at this time. Project implementation would facilitate development throughout the City to create a mixed-use, compact, and multi-modal environment; promote sustainable principles in design and development; and support land uses that further regional transportation and transit planning objectives. Future development would re-capture and re-use underutilized land area in the City. These objectives of the Specific Plan would reduce GHG emissions. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including those associated with GHG emission reductions. Because of the programmatic nature of the proposed Project, including the uncertainty of timing of future development, future development could exceed SCAQMD recommended threshold of 3,000 MT CO_2e per year. Therefore, impacts are considered significant and unavoidable.

Mitigation Measures

No GHG reduction measures are feasible as the reasonable and feasible on-site design features are not known at this time. Additional off-site mitigation measures would also not be feasible as the largest component for GHG emissions for the Project are from mobile emissions, which are regulated by different state and regional policies and regulations. Therefore, impacts would remain significant and unavoidable.

Impact 4.6-2: Would the project conflict with any applicable plan, policy, regulation, or recommendation of an agency adopted for the purpose of reducing the emissions of GHG?

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 GHGs, as evaluated below.

CARB'S CLIMATE CHANGE SCOPING PLAN

The 2017 Scoping Plan identifies how the state can achieve the SB 32 2030 climate target to reduce greenhouse gas (GHG) emissions by 40 percent from 1990 levels, and "substantially advance" toward the EO S-3-05 2050 climate goal to reduce GHG emissions by 80 percent below 1990 levels by 2050. The Scoping Plan incorporates, coordinates, and leverages many existing and ongoing GHG reduction efforts and identifies new policies and actions to accomplish the state's climate goals.

Table 4.6-1: Consistency with Applicable Greenhouse Gas Reduction Strategies in CARB 2017 Scoping Plan contains a list of GHG-reducing strategies that are included in the 2017 Scoping Plan and are potentially applicable to the Project. The analysis demonstrates the consistency of the Project with these strategies that support the state's strategies in the Climate Change Scoping Plan to reduce GHG emissions. The Climate Change Scoping Plan relies on a broad array of GHG reduction actions, which include direct regulations, alternative compliance mechanisms, incentives, voluntary actions, and market-based mechanisms such as the Cap-and-Trade Program. As shown below, the Project would implement project design features and incorporate characteristics to reduce energy, conserve water, reduce waste generation, and reduce vehicle travel consistent with statewide strategies and regulations. As a result, the Project would not conflict with applicable Climate Change Scoping Plan strategies and regulations to reduce GHG emissions.

Table 4.6-1: Consistency with Applicable Greenhouse Gas Reduction Strategies in CARB 2017 Scoping Plan		
Pollutant	**Description**	**Consistency**
California Renewables Portfolio Standard and SB 350	Increases the proportion of electricity from renewable sources to 33% renewable power by 2020. SB 350 requires 50 percent by 2030. It also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.	**Consistent.** Future projects facilitated by the RLASCSP would use electricity provided by SCE, which is required to meet the 2030 performance standard. Future projects facilitated by the RLASCSP would also meet or exceed the applicable energy efficiency requirements of the CALGreen Code. Future projects facilitated by the RLASCSP would incorporate energy efficiency measures as outlined in subsection 3.6.7.
SB 1383	Approve and implement Short-Lived Climate Pollutant strategy to achieve a 40% reduction in methane and hydrofluorocarbon emissions a 50% reduction in anthropogenic black carbon emissions below 2013 levels by 2030.	**Consistent.** Future projects facilitated by the RLASCSP would use facilities such as wastewater treatment plants and landfills that would be consistent with the SLCP Strategy.
CCR, Title 24	Energy Efficiency Standards for Residential and Non-residential Buildings.	**Consistent.** Future projects facilitated by the RLASCSP would meet or exceed the applicable requirements of the CALGreen Code as required by state law. Future projects may include additional efficiency components
AB 1109	The Lighting Efficiency and Toxics Reduction Act (AB 109) prohibits manufacturing specified general purpose lights that contain levels of hazardous substances prohibited by the European Union. AB 1109 also requires a reduction in average statewide electrical energy consumption by not less than 50% from the 2007 levels for indoor residential lighting and not less than 25% from the 2007 levels for indoor commercial and outdoor lighting by 2018.	**Consistent.** As discussed above, the Project would also meet or exceed the applicable requirements of the CALGreen Code. The Project would incorporate energy efficiency measures as outlined in subsection 3.6.7.
California Green Building Standards Code Requirements	All irrigation controllers must be installed with weather sensing or soil moisture sensors. Stormwater Pollution Prevention Plan (SWPPP) required. Requires a minimum of 50% recycle or reuse of nonhazardous construction and demolition debris.	**Consistent.** The Project would meet this requirement as part of its compliance with the CALGreen Code.
[1] Volatile Organic Compounds (VOCs or Reactive Organic Gases [ROG]) are hydrocarbons/organic gases that are formed solely of hydrogen and carbon. There are several subsets of organic gases including ROGs and VOCs. Both ROGs and VOCs are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. The major sources of hydrocarbons are combustion engine exhaust, oil refineries, and oil-fueled power plants; other common sources are petroleum fuels, solvents, dry cleaning solutions, and paint (via evaporation).		
Source: California Air Pollution Control Officers Association (CAPCOA), Health Effects, Accessed March 18, 2020.		

Former California Governor Jerry Brown signed into law SB 350 (Chapter 547, Statues of 2015), which increased the Renewable Portfolio Standard to 50 percent by 2030, including interim targets of 40 percent by 2024 and 45 percent by 2027, and doubled energy efficiency savings in electricity and natural gas final end uses.

While the Project itself is not subject to the Cap-and-Trade regulation, Project-related emissions associated with the buildout of the RLASCSP would decline pursuant to the regulation as utility providers and transportation fuel producers are subject to renewable energy standards, Cap-and-Trade, and the LCFS. The 2017 Scoping Plan also calls for the doubling of the energy efficiency savings, including demand-response flexibility for ten percent of residential and commercial electric space heating, water heating, air conditioning and refrigeration. The strategy is in the process of being designed specifically to accommodate existing residential and commercial uses under the California Energy Commission's Existing Building Energy Efficiency Action Plan.

SCAG'S CONNECT SOCAL

Under SB 375, the SCAG Connect SoCal sets forth transportation and land use strategies to achieve GHG reduction targets set by CARB. Consistent with SCAG's Connect SoCal integration of transportation and land use strategies, the Project would accommodate projected increases in travel demand by implementing smart land use strategies that include redeveloping the underutilized site. The Project would encourage alternative modes of transportation by facilitating development opportunities for Transit Oriented Development adjacent to the proposed WSAB Gardendale Transit Station. The Project is consistent with the Connect SoCal strategy of focusing new growth around transit because the Focus Area is served by Metro Bus routes including the 117, 120, 258 and 265, as well as the future Gardendale Station of the WSAB Transit Corridor Project light rail line. The Connect SoCal promotes reducing the reliance of vehicle trips by providing more housing and job opportunities within 0.5 mile of high-quality transit stations. The Project would be consistent with this Connect SoCal goal by providing 700 DU and 1,130,000 of commercial and retail uses within close proximity to the future WSAB Gardendale Transit Station. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including compliance with the most current CALGreen code.

City of Downey, General Plan Vision 2025

The City of Downey outlines building design considerations within the Conservation Chapter of the DGP, which include advanced programmable thermostats; windows with high-performance, low-emission, double-pane glazing; ductwork installed inside the conditioned space to reduce cooling and heating losses to the exterior; fluorescent-lighting systems; high-efficiency appliances; and solar hot water pre-heating system.

Consistency with SB 32 and Executive Orders S-3-05

SB 32 establishes the 2030 GHG emissions reduction target of 40 percent below 1990 levels, and E.O. S-3-05 establishes a 2050 GHG reduction goal of 80 percent below 1990 levels. As analyzed above in subsection 3.6.8, CARB's Climate Change Scoping Plan, the Project would be consistent with and not conflict with the CARB 2017 Scoping Plan, and therefore with the state's ability to achieve the SB 32 GHG reduction target and ultimately the EO S-3-05 2050 GHG reduction goal.

Statewide efforts are underway to facilitate the state's achievement of targets and goals, and it is reasonable to expect the Project's emissions level to decline as the regulatory initiatives identified by CARB in the 2017 Scoping Plan are developed, adopted and implemented, and other technological innovations occur. As previously noted, all future projects would be subject to the City's development

review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including compliance with the most current CALGreen code regarding building efficiency standards as well as future state environmental policy objectives.

Achievement of the 2030 and 2050 GHG reduction targets will require emission reductions in every sector and set the state on a path consistent with the Paris Agreement to limit global warming to below 2 degrees Celsius.[14] Any future development facilitated by the RLASCSP would be required to adhere to all federal, state, and local requirements for GHG emissions reductions which would be reduced over time through improvements in the energy, transportation, water, and waste management sectors. Regarding goals for 2050 under EO S-3-05, at this time it is not possible to quantify the emissions savings from future regulatory measures, as they have not yet been developed; nevertheless, it can be anticipated that operation of the Project would benefit from the implementation of current and potential future regulations (e.g., improvements in vehicle emissions, SB 100/renewable electricity portfolio improvements, CARB's Mobile Source Strategy, etc.) enacted to meet an 80 percent reduction below 1990 levels by 2050.

For the reasons described above, because the Project would be consistent with the 2017 Scoping Plan and because the Project's post-2020 emissions trajectory is expected to follow a declining trend, the Project is consistent with and would not conflict with of the state's ability to achieve the SB 32 2030 GHG reduction target and 2050 GHG reduction goal.

In summary, Impact 4.6-2 is less than significant because the Project would be consistent with, and not conflict with, GHG reduction policies, strategies, and regulations outlined in CARB's 2017 Climate Change Scoping Plan, SCAG's Connect SoCal, and the DGP, as well as the state's ability to achieve the SB 32 2030 GHG reduction target, and the EO S-3-05 2050 GHG reduction goal.

Mitigation Measures

No mitigation is required.

4.6.6 CUMULATIVE IMPACTS

Climate change is a global issue. GHGs are global pollutants, unlike criteria air pollutants and TACs, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about 1 day), GHGs have much longer atmospheric lifetimes of 1 year to several thousand years that allow them to be dispersed around the globe.

Impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. The additive effect of Project-related GHGs would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. In addition, the Project as well as other cumulative related projects would also be subject to all applicable regulatory requirements, which would further reduce GHG emissions. Although individual development projects have the potential to exceed individual project level thresholds, all future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including those related to GHG

[14] CARB, *California's 2017 Climate Change Scoping Plan*, 2017.

emission reduction. As the extent of GHG emissions from individual development projects facilitated by the RLASCSP cannot be quantified at this time, GHG emissions would be cumulatively considerable at the programmatic level.

However, although individual development projects under the Specific Plan may exceed applicable GHG thresholds, as discussed above, the overall planned development within the Specific Plan would not conflict with the Connect SoCal, the CARB Scoping Plan, or the City's General Plan. Project implementation would facilitate development throughout the City to create a mixed-use, compact, and multi-modal environment; promote sustainable principles in design and development; and support land uses that further regional transportation and transit planning objectives. Future development would re-capture and re-use underutilized land area in the City. Therefore, the Project would not conflict with GHG reduction plans and cumulative impacts in this regard would not be cumulatively considerable.

4.6.7 SIGNIFICANT UNAVOIDABLE IMPACTS

The proposed Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Due to the uncertainty of future development facilitated by the RLASCSP, project specific emissions calculations are not available or possible at the time of this writing. Therefore, the proposed Project may result in GHG emissions that may have a significant impact on the environment.

4.6.8 REFERENCES

California Air Resources Board (CARB), *2020 Edition, California Greenhouse Gas Emission Inventory: 2000 – 2018*, 2020.

CARB, *Climate Change Scoping Plan*, 2008.

CARB, *First Update to the Climate Change Scoping Plan*, May 2014.

CARB, *California's 2017 Climate Change Scoping Plan*, 2017.

CARB, Short-Lived Climate Pollutant Reduction Strategy, March 2017. Available online at: https://www.arb.ca.gov/cc/shortlived/meetings/03142017/final_slcp_report.pdf. Accessed May 26, 2021.

California Natural Resources Agency (CNRA), *Final Statement of Reasons for Regulatory Action*, pages 11-13, 14, and 16, 2009.

Intergovernmental Panel on Climate Change (IPCC), *Fifth Assessment Report, Summary for Policy Makers*, pg. 15, 2013.

U.S. EPA, *EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks*, 2012. Available online at: https://nepis.epa.gov/Exe/ZyPDF.cgi/P100EZ7C.PDF?Dockey=P100EZ7C.PDF. Accessed May 26, 2021.

U.S. EPA, *Mid-Term Evaluation of Greenhouse Gas Emissions Standards for Model Year 2022-2025 Light-Duty Vehicles, 83 Fed. Reg. 16077*, 2018. Available online at: https://www.gpo.gov/fdsys/pkg/FR-2018-04-13/pdf/2018-07364.pdf. Accessed May 26, 2021.

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4.7 HAZARDS AND HAZARDOUS MATERIALS

4.7.1 INTRODUCTION

The purpose of this section is to describe the existing regulatory setting and environmental conditions concerning potential impacts from hazards (other than geological and flood hazards) associated with the Project area, infrastructure, activities, and materials that could result from Project implementation, and as necessary, recommend mitigation to avoid or reduce the significance of impacts. The analysis in this section is based on regulatory database searches performed by Kimley-Horn and Associates, Inc (Kimley-Horn, May 2021) to identify hazardous material regulated facilities on or near the Project area.

Information in this section is based primarily on the following sources:

- Department of Toxic Substances Control (DTSC)'s Envirostor website: (http://www.envirostor.dtsc.ca.gov/public/). Accessed May 20, 2021 and May 21, 2021
- State Water Resources Control Board's Geotracker website (http://geotracker.waterboards.ca.gov/). Accessed May 20, 2021 and May 21, 2021
- Rancho Los Amigos South Campus Project Final EIR (County Project EIR), County of Los Angeles

DEFINITION OF HAZARDOUS MATERIALS

Hazardous materials, as defined by the California Code of Regulations, are substances with certain physical properties that could pose a substantial present or future hazard to human health or the environment when handled, disposed, or otherwise managed improperly. Hazardous materials are grouped into the following four categories, based on their properties:

- Toxic – causes human health effects
- Ignitable – has the ability to burn
- Corrosive – causes severe burns or damage to materials
- Reactive – causes explosions or generates toxic gases

A hazardous waste is any hazardous material that is discarded, abandoned, or slated to be recycled. The criteria that define a material as hazardous also define a waste as hazardous. If handled, disposed, or otherwise handled improperly, hazardous materials and hazardous waste can result in public health hazards if released into the soil or groundwater or through airborne releases in vapors, fumes, or dust. Soil and groundwater having concentrations of hazardous material constituents higher than specific regulatory levels must be handled and disposed of as hazardous waste when excavated or pumped from an aquifer. The California Code of Regulations, Title 22, §§66261.20-24 contain technical descriptions of toxic characteristics that could cause soil or groundwater to be classified as hazardous waste.

Because the Project does not propose the construction of development but provides capacity for future development consistent with state and local regulations, site-specific surveys to determine the presence or absence of hazardous materials at the Focus Area have not been conducted. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements. This could include a review of local, state, tribal, and federal environmental record sources, standard historical

sources, aerial photographs, fire insurance maps and physical setting sources. Future projects would also likely include a reconnaissance of individual sites to review site use and current conditions to check for the storage, use, production or disposal of hazardous or potentially hazardous materials, as well as interviews with persons knowledgeable about current and past site use.

4.7.2 AFFECTED ENVIRONMENT

The Focus Area is approximately 62.5 acres comprising the southern portion of the City's approximately 172-acre Rancho Los Amigos South Campus Specific Plan (RLASCSP) area. In 1888, the Los Angeles County Poor Farm (Poor Farm) opened in the Specific Plan area. The area was primarily agricultural in nature and consisted of facilities that provided work opportunities, housing, and medical care for those that were poor or needy. Throughout the first half of the 20th century, the Poor Farm continued to grow in population and was widely recognized as a highly successful agricultural practice within the region. An emphasis on regional-serving medical facilities became the property's primary use through the development of Rancho Los Amigos National Rehabilitation Center and establishment of the Long-Term Care Facility in 1933. Consolidation of many of the administrative and primary hospital uses in the 1950s to the present-day Rancho Los Amigos National Rehabilitation Center north of Imperial Highway signaled the phasing out of many of the facilities at the Rancho Los Amigos Campus' southern portion.

The Specific Plan area, inclusive of the Focus Area is irregularly shaped and relatively flat. On-site topography is generally flat at approximately 90 feet above mean sea level (msl). The general topographic gradient is generally to the south-southwest, toward the Los Angeles River and Pacific Ocean.

CURRENT USES OF ADJOINING PROPERTIES

An adjoining property is considered any real property or properties that share a common border or boundary with the project site, or that would share a common border or boundary but for a street or road separating them. The following land uses have been observed adjoining the Focus Area:

- North: Active commercial manufacturing uses as well as portions of the Rancho Los Amigos Specific Plan outside the Focus Area.
- South: The Focus Area is bordered by Gardendale Street to the south. The area south of Gardendale Street is developed, consisting primarily of single-family residences. Dakota Avenue runs north/south parallel to the Union Pacific Railroad (UPRR) tracks. Properties along both sides of the UPRR tracks appear to be developed for industrial uses. An above ground tank is situated on a parcel owned by Southern California Water Company in the southwest corner of Greendale Street at Dakota Avenue.
- East: St. Pius X - St. Matthias Academy, a private Catholic high school is located southeast of the Focus Area.
- West: The southwest portion of the Focus Area is bisected by Garfield Avenue. The property adjacent to and west of Garfield Avenue is undeveloped, vacant land.

PHYSICAL SETTING SOURCES

USGS 7.5 Minute Topographic Map

USGS topographic maps depict the physical setting of an area through the use of various markings and shading, indicating the presence of built or natural elements. Waterbodies such as lakes, rivers, and streams, structures, streets, and contours are all elements of a topographic map that may help identify characteristics or factors that could impact the spread of contamination. Topographic maps for the *South Gate, California* quadrangle from 1964, 1981, 2018 and the *Bell, California* quadrangle from 1923 were reviewed. The Specific Plan area is labeled "County Farm" in the 1923 topographic map and labeled as "Rancho Los Amigos Hospital" in the 1964 and 1981 topographic maps. Structures of various sizes and configurations are present on the topographic maps from 1923, 1964, and 1981. No labels associated with dumps, tanks, or oils wells were observed.

Geology and Soils

The condition and type of soil are major factors affecting infiltration and runoff. The Natural Resources Conservation Service has classified soils into four general categories for comparing infiltration and runoff rates. The categories are based on properties that influence runoff, such as water infiltration rate, texture, natural discharge, and moisture condition. The runoff potential is based on the amount storm water runoff at the end of a long duration storm that occurs after the soil is saturated.

Soil types were determined using the U.S. Department of Agriculture Web Soil Survey, which indicates underlying soils consist of Urban land – Metz-Pico complex. These soils typically consist of fill materials over mixed alluvium derived from granite and/or sedimentary rock. Soils are somewhat excessively drained, and not prone to runoff. The Web Soils Survey states site soils are generally in hydrologic soil group (HSG) type B. Soil type B are soils that have moderate infiltration rates when thoroughly wet and are typically composed of moderately well to well drained soils.

Groundwater and Water Wells

Environmental Data Resources Inc. (EDR) provided a search of the USGS Well Database, the federal Public Water System Database, and the State Well Database. According to EDR, there are ten wells or well clusters at the Focus Area or within 1/8 mile of the site. Of those, five wells or well clusters appear to be within the limits of the Focus Area. EDR identifies the wells as water wells, but they are not designated as public water supply wells. Groundwater levels were not reported in the EDR report.

According to Geotracker (accessed June 3, 2021), there are 26 monitoring wells within the Focus Area. Two monitoring wells located near Aliso Street and Erickson Avenue are associated with the Anadite facility. Groundwater was encountered in this area approximately 40 to 42 feet below ground surface. Thirteen wells are situated at the Hollydale facility, west of the UPRR tracks, east of Garfield Avenue, and north of Gardendale Street. Two additional wells are situated east of the UPRR tracks, in the same vicinity of the other thirteen wells. Groundwater was encountered at the Hollydale wells at depths of approximately 45-48 feet below ground surface. Geotracker has identified nine wells associated with the (former) Rancho Los Amigos Hospital South Campus. Groundwater for these monitoring wells was encountered approximately 32 to 43 feet below ground surface.

Flood Hazards

According to the EDR GeoCheck Report, the Specific Plan area, inclusive of the Focus Area is not located within a 100-year flood zone. The site is mapped on FEMA Flood Insurance Rate Map 06037C1820F. The FEMA map also notes the Specific Plan area is in an area with reduced flood risk due to levees.

Records Sources

As a part of the County Project EIR, the County conducted hazardous materials surveys from 2005 through 2017 of all on-site buildings and tunnels to identify the locations and concentrations of hazardous building materials. The surveys consisted of visual inspection, collection of suspect asbestos and/or lead-containing samples, and laboratory analysis. Asbestos and/or lead based paint were found in all buildings within the Focus Area except for four buildings: Buildings 1335, 1464, 2494, and 4121 (County Project EIR Figure 3.7-1).

Soil and Groundwater Investigations

Former Rancho Los Amigos Southern Campus

According to Geotracker (accessed May 19, 2021), the southern campus area is subject of an open site assessment related to a leaking underground tank (UST). Leighton Consulting, Inc. prepared an Additional Site Assessment and Remedial Action Report (Leighton, 2016). The purpose of the report was to define the limit of a light non-aqueous phase liquids (LNAPL) plume that was discovered during previous investigations. LNAPL are groundwater contaminants that are typically not soluble in water, and have a lower density of water. The plume was suspected of impacting site soils and groundwater under the campus. The County Project EIR identified one 600-gallon UST and one 800-gallon UST were removed from the vicinity of Building 1276 (Area 10 on County Project EIR Figure3.7-1) in 1985. In general, Area 10 is situated north of Bonita Street, east of Laurel Street, south of Descanso Street, and west of Eriskcon Avenue. The County Project EIR has noted the soil at Area 10 on County Project EIR Figure 3.7-1, has been tested for VOCs; TPH as gasoline, diesel, and motor oil; pesticides; and metals. Residual levels of VOCs (di-isopropyl ether [DIPE], 1,2-dichloroethane [1,2-DCA], benzene, toluene, xylenes, 1,2,4-trimethyl benzene [1,2,4-TMB], and tributyl alcohol [TBA]) and TPH in soil at concentrations below the RSLs may be present in this area. Elevated concentrations of petroleum hydrocarbons above Regional Screening Levels (RSLs) have been identified in soil; however, based on the various investigations performed to date, the lateral and vertical extent of hydrocarbon impacted soil has been adequately defined (Leighton, 2016). The County Project EIR found ongoing remedial activities to address impacted soils continue to be conducted under the oversight of the Los Angeles Regional Water Quality Control Board (Los Angeles RWQCB) to achieve regulatory closure requirements for this area.

Hollydale Yard

The County of Los Angeles Department of Public Works Hollydale Yard is a maintenance facility located within the southwestern part of the Focus Area and west of the UPRR tracks (LADPW, 2019). The Yard has the fueling facility shown on County Project EIR Figure 3.7-1 located west of the UPRR tracks and north of Gardendale Street that includes one 10,000-gallon gasoline UST and one 10,000-gallon diesel UST, both of which were installed in 1987 to replace earlier USTs. Gasoline and fuel additives were detected in soil in 2004 during facility upgrading activities and in groundwater in the subsequent 2014 investigation. The Hollydale Yard has been investigated under the jurisdiction of the County since 2004 and the Los Angeles

RWQCB since 2015. The extent of fuel in the soil is limited to the Hollydale Yard facility. However, gasoline and the fuel additives methyl tertiary butyl ether (MTBE), TBA, and tertiary amyl methyl ether (TAME) have migrated down to groundwater that is migrating to the northeast in the RLASCSCP area (referred to as Area 13 in the County Project EIR).

Groundwater monitoring has been conducted at the Hollydale Yard since 2014 to delineate the nature and extent of gasoline and its fuel additives in groundwater (LACO, 2019). The width of the gasoline plume has been delineated as fairly narrow and flowing to the northeast. The downgradient extent has not yet been delineated and it is unknown whether the plume extends to beneath Area 13. However, the depths to groundwater measured between 2014 and 2018 have been at least 39 feet, whereas the maximum depth of excavation for the proposed project is a maximum of 20 feet, as discussed in **Section 2: Project Description**. Additionally, groundwater is not used as a drinking water source. Therefore, it is not anticipated that the Hollydale groundwater plume would affect the Focus Area.

Anadite Facility

The Anadite facility, located at 10647 Garfield Avenue in the City of South Gate (approximately 0.5 mile north-northwest of the Focus Area), is subject of an open Cleanup and Abatement Order related to impacts from VOCs including Tetrachloroethylene (PCE) and Trichloroethylene (TCE). According to Geotracker (accessed May 20, 2021), the Anadite facility was historically used for industrial plating, coating, chemical milling and anodizing, and painting from the 1950s to the mid-2000s. Soil impacted with VOCs from the Anadite facility appear to be localized under the historical Anadite manufacturing. However, VOCs plumes in groundwater from the Anadite facility extend beneath the Focus Area. Monitoring wells 43, 49, 55, 57 are located within the Focus Area. Groundwater monitoring and sampling was completed in 2015 by CDH (CHD, 2015). According to the CDH report, PCE, TCE, 1,1-dichloroethene (1,1-DCE), cis-1,2- dichloroethene (cis-1,2-DCE), and 1,4-dioxane were detected in monitoring wells 42, 49, and 55. Anadite is financially responsible for cleanup activities associated with the contamination resulting from Anadite's operations. A soil vapor extraction system was installed in March 2003 at the Anadite facility to address issues with contamination in the soil vapor. In October 2018, abatement activities were halted due to funding issues. In March 2020, a grant from the State Water Board was issued to restart the soil vapor extraction efforts, continue groundwater monitoring, and complete additional investigations related to impacts on residential properties north of the Anadite facility.

Groundwater was documented by CDH to be 80 to 200 feet below ground surface in the Focus Area. According to CDH, there are no groundwater production wells threatened by impacted groundwater associated with the Anadite facility. This PEIR assumes no grading and excavation activities would reach groundwater levels. Therefore, it is not anticipated that the Anadite groundwater plume would affect the Project.

Schools

Two schools have been identified within 0.25 mile of the Focus Area.

- Rancho Los Amigos KinderCare Preschool, 7755 Golondrinas Street, located approximately 0.2 mile northeast of the Focus Area.
- St. Pius X - St. Matthias Academy, 7851 Gardendale Street, located adjacent to the southeast section of the Focus Area.

Airports

There are no airports or airstrips within two miles of the Focus Area. The nearest airport is the general aviation (non-commercial) Compton/Woodley Airport, located about five miles to the southwest.

Emergency and Disaster Routes

Disaster Routes are transportation routes designated by the County, such as freeway, highway or arterial routes, that are pre-identified for use during times of crisis. These routes are used to bring in emergency personnel, equipment, and supplies to impacted areas in order to save lives, protect property and minimize impact to the environment. During a disaster, these routes have priority for clearing, repairing and restoration over all other roads. The County states that "Disaster Routes are not Evacuation Routes. Although an emergency may warrant a road be used as both a disaster and evacuation route, they are completely different. An evacuation route is used to move the affected population out of an impacted area."[1] Evacuation routes depend on the nature and location of the emergency or disaster. Interstate 5 (I-5), I-105, I-605, and I-710 are Freeway Disaster Routes. Imperial Highway is a designated Disaster Route. None of the streets within or adjacent to the Focus Area are designated Disaster Routes (County of Los Angeles, 2008).

Wildfires

The California Department of Forestry and Fire Protection (Calfire) maps identify fire hazard severity zones in state and local responsibility areas for fire protection. The Specific Plan area, inclusive of the Focus Area is not located within an area designated as a very high fire hazard severity area (Calfire, 2019).

4.7.3 REGULATORY SETTING

The management of hazardous materials and hazardous waste is regulated by various federal, state, and local agencies. Programs are administered through federal agencies including the U.S. Environmental Protection Agency (U.S. EPA), and state agencies within the California Environmental Protection Agency (Cal EPA) including the California DTSC.

FEDERAL

Toxic Substances Control Act

This federal act regulates the introduction of new or already existing chemicals (which are mostly grandfathered in). Chemicals not on a list (the TSCA Inventory) or subject to an exemption may not be manufactured or imported into the U.S. The U.S. EPA reviews all "new" chemicals (i.e., those not on the inventory) and regulates (or bans) those found to be an "unreasonable risk to human health or the environment." The TSCA also addresses exposure to specific chemicals, or classes of chemicals, in various subchapters of the law, including: asbestos, (indoor) radon levels, lead (such as in paints and toys), dioxin, hexavalent chromium and PCBs. It also bans the use of chlorofluorocarbons in manufacturing.

[1] Los Angeles County Public Works. (2021). Accessed from https://pw.lacounty.gov/dsg/disasterroutes/

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)/Superfund Amendments and Reauthorization Act

The federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the Superfund Act, was enacted by Congress on December 11, 1980. This law (U.S. Code Title 42, Chapter 103) provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites; provides for liability of persons responsible for releases of hazardous waste at these sites; and establishes a trust fund to provide for cleanup when no responsible party can be identified. The U.S. EPA Superfund Information System does not list any hazardous or potentially hazardous sites being assessed pursuant to CERCLA within the Focus Area (U.S. EPA, 2017a).

Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS) and the National Priorities List

The U.S. EPA also maintains the Comprehensive Environmental Response Compensation (CERCLIS) and Liability Information System list. This list contains sites that are either proposed to be or on the National Priorities List (NPL), as well as sites that are in the screening and assessment phase for possible inclusion on the NPL. The NPL is a list of the worst hazardous waste sites that have been identified by Superfund. There are no NPL sites within the Focus Area.

Emergency Planning and Community Right-to-Know Act

The federal Emergency Planning and Community Right-To-Know Act (EPCRA) was enacted to inform communities and residents of chemical hazards in their area. Businesses are required to report the locations and quantities of chemicals stored on-site to both state and local agencies. EPCRA requires the U.S. EPA to maintain and publish a digital database list of toxic chemical releases and other waste management activities reported by certain industry groups and federal facilities. The Toxic Release Inventory tracks the management of certain toxic chemicals that may pose a threat to human health and environment. This database, known as the Toxic Release Inventory, gives the community more power to hold companies accountable for their chemical management.

Hazardous Materials Transportation Act

The U.S. Department of Transportation (DOT) receives authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act, as amended and codified (49 U.S.C. 5101 et seq.). The DOT is the primary regulatory authority for the interstate transport of hazardous materials and establishes regulations for safe handling procedures (i.e., packaging, marking, labeling and routing).

In California, Section 31303 of the California Vehicle Code states that any hazardous material being moved from one location to another must use the route with the least travel time. This, in practice, means major roads and highways, although secondary roads are permitted to be used for local delivery. These policies are enforced by both the California Highway Patrol and the California Department of Transportation (Caltrans).

Resource Conservation and Recovery Act (RCRA)

RCRA Subtitle C (USC Title 42, Chapter 82) addresses hazardous waste generation, handling, transportation, storage, treatment and disposal. It includes requirements for a system that uses hazardous waste manifests to track the movement of waste from its site of generation to its ultimate disposition. Amendments to RCRA in 1984 created a national priority for waste minimization. Subtitle D establishes national minimum requirements for solid waste disposal sites and practices. It requires states to develop plans for the management of wastes within their jurisdictions. Subtitle I requires monitoring and containment systems for underground storage tanks that hold hazardous materials. Owners of tanks must demonstrate financial assurance for the cleanup of a potential leaking tank. In addition to specific materials produced by industry, hazardous wastes are often generated as by-products of industrial, manufacturing, agriculture and other uses. RCRA defines a hazardous waste as any solid, liquid or contained gaseous material that is disposed, incinerated or recycled. A hazardous material may also become hazardous waste through its accidental or inadvertent release into the environment. Both hazardous materials and hazardous waste pose potential risks to health, safety and welfare in Los Angeles County if handled inappropriately. All hazardous waste must be discharged at a Class I facility (see discussion below on landfills). Small-scale hazardous waste generators are businesses that generate less than 2,205 pounds (1,000 kilograms) of hazardous waste per month (that is, 13.23 tons per year). This database describes the type of hazardous material generated and the method of disposal, either through on-site release, off-site disposal or off-site recycling.

Occupational Safety and Health Administration (OSHA)

Congress passed the Occupational and Safety Health Act (OSHA) to ensure worker and workplace safety. Their goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. In order to establish standards for workplace health and safety, the Act also created the National Institute for Occupational Safety and Health (NIOSH) as the research institution for the Occupational Safety and Health Administration (OSHA). OSHA is a division of the U.S. Department of Labor that oversees the administration of the Act and enforces standards in all 50 states. OSHA standards are listed in Title 29 CFR Part 1910.

OSHA's Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) applies to five groups of employers and their employees. This includes any employees who are exposed or potentially exposed to hazardous substances (including hazardous waste) and who are engaged clean-up operations; corrective actions; voluntary clean-up operations; operations involving hazardous wastes at treatment, storage, and disposal facilities; and emergency response operations.

Clean Water Act/SPCC Rule

The Clean Water Act (CWA) (33 U.S.C. §1251 et seq., was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and certain non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA §402). In California, NPDES permitting authority is delegated to, and administered by, the nine Regional Water Quality Control Boards (RWQCBs). The proposed Project is within the jurisdiction of the Los Angeles RWQCB.

Section 402 of the Clean Water Act authorizes the California State Water Resources Control Board (SWRCB) to issue NPDES General Construction Storm Water Permit (Water Quality Order 99-08-DWQ), referred to as the "General Construction Permit."

Construction activities can comply with and be covered under the General Construction Permit provided that they:

- Develop and implement a Storm Water Pollution Prevention Plan (SWPPP) which specifies Best Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving off-site into receiving waters
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the nation; and
- Perform inspections of all BMPs.

NPDES regulations are administered by the RWQCB. Projects that disturb one or more acres are required to obtain NPDES coverage under the Construction General Permits.

STATE

California Environmental Protection Agency

The California Environmental Protection Agency (CalEPA) is the agency with jurisdiction over hazardous materials and wastes at the state level. The DTSC is the department within CalEPA responsible for implementing and enforcing California's own hazardous waste laws, which are known collectively as the Hazardous Waste Control Law. DTSC regulates hazardous waste in California primarily under the authority of the federal RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Although similar to RCRA, the California Hazardous Waste Control Law and its associated regulations define hazardous waste more broadly and so regulate a larger number of chemicals. Hazardous wastes regulated by California but not by the U.S. EPA are called "non-RCRA hazardous wastes. Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Government Code Section 65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites, Department of Health Services lists of contaminated drinking water wells, sites listed by the State Water Resources Control Board as having underground storage tank leaks and have had a discharge of hazardous wastes or materials into the water or groundwater, and lists from local regulatory agencies of sites that have had a known migration of hazardous waste/material.

The enforcement of directives from DTSC is handled at the local level, in this case the Los Angeles County Department of Environmental Health Hazardous Materials Branch. The Los Angeles RWQCB also has the authority to implement regulations regarding the management of soil and groundwater investigation.

California Hazardous Waste Control Law

The Hazardous Waste Control Law (HWCL) (HSC, Division 20, Chapter 6.5, Article 2, §25100, et seq.) is the primary hazardous waste statute in California. The HWCL implements RCRA as a "cradle-to-grave" waste management system in the state. It specifies that generators have the primary duty to determine whether their wastes are hazardous and to ensure its proper management. The HWCL also establishes criteria for

the reuse and recycling of hazardous wastes used or reuse as raw materials. The HWCL exceeds federal requirements by mandating source reduction planning and broadening requirements for permitting facilities that treat hazardous waste. It also regulates a number of waste types and waste management activities not covered by federal law (RCRA).

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) requires the administrative consolidation of six hazardous materials and waste programs (Program Elements) under one agency, a Certified Unified Program Agency (CUPA). The Program Elements consolidated under the Unified Program are: (1) Hazardous Waste Generator and On-site Hazardous Waste Treatment Programs (Tiered Permitting); (2) Aboveground Petroleum Storage Tanks (Spill Prevention Control and Countermeasure Plan [SPCC]); (3) Underground Storage Tank (UST) Program; (4) Hazardous Materials Release Response Plans and Inventory Program (Hazardous Materials Disclosure or "Community-Right-To-Know"); (5) California Accidental Release Prevention Program (Cal ARP); and (6) Uniform Fire Code Plans and Inventory Requirements.

California Office of Emergency Services (OES)

To protect the public health and safety and the environment, the California OES is responsible for establishing and managing statewide standards for business and area plans relating to the handling and release or threatened release of hazardous materials. Basic information on hazardous materials handled, used, stored, or disposed of (including location, type, quantity, and the health risks) needs to be available to firefighters, public safety officers, and regulatory agencies. The information must be included in these institutions' business plans to prevent or mitigate the damage to the health and safety of persons and the environment from the release or threatened release of these materials into the workplace and environment.

These regulations are covered under Chapter 6.95 of the California Health and Safety Code Article 1 – Hazardous Materials Release Response and Inventory Program (§§25500 to 25520) and Article 2 – Hazardous Materials Management (§§25531 to 25543.3). CCR Title 19, Public Safety, Division 2, Office of Emergency Services, Chapter 4 – Hazardous Material Release Reporting, Inventory, and Response Plans, Article 4 (Minimum Standards for Business Plans) establishes minimum statewide standards for Hazardous Materials Business Plans (HMBP). These plans shall include the following: (1) a hazardous material inventory in accordance with Sections 2729.2 to 2729.7; (2) emergency response plans and procedures in accordance with Section 2731; and (3) training program information in accordance with Section 2732. Business plans contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of in the state. Each business shall prepare a HMBP if that business uses, handles, or stores a hazardous material or an extremely hazardous material in quantities greater than or equal to the following: 500 pounds of a solid substance, 55 gallons of a liquid, 200 cubic feet of compressed gas, a hazardous compressed gas in any amount, or hazardous waste in any quantity.

Hazardous Waste Source Reduction and Management Review Act

This 1989 act, also sometimes referred to as Senate Bill (SB) 14, requires hazardous waste generators to use source reduction as the preferred method of managing hazardous waste. Source reduction is preferable to recycling and treatment options because source reduction avoids waste generation costs

and management liability. It also provides the best protection for public health and the environment. Under SB 14, facilities generating more than 12 kilograms of hazardous waste or extremely hazardous waste are required to do source reduction planning. Hazardous waste generators subject to SB 14 are each required to prepare and implement a Source Reduction Evaluation Review and Plan, a Hazardous Waste Management Performance Report and submit annual Summary Progress Reports.

Medical Waste Management Act

This act, chaptered in HSC §§117600 through 118630, sets regulations for ensuring the safe handling, storage, processing and disposal of medical wastes within California. Among other things, it addresses medical waste generators, as well as medical waste treatment facilities, defines medical wastes, biohazards and related materials, and also requires medical waste management plans of all generators of medical waste (both "large" and "small"). It also addresses the establishment and actions of a "medical waste management program" for local agencies, such as the County of Los Angeles. Such programs encompass the issuance of "medical waste registrations," medical waste management plans, inspection of large-quantity medical waste generators, medical waste treatment facilities and medical waste haulers, as well as the investigation of violations of the HSC and enforcement of these regulations.

Tanner Act

The Tanner Act (Assembly Bill [AB] 2948) addresses the handling of hazardous materials. This legislation serves to govern the preparation of hazardous waste management plans in California, as well as address the siting of hazardous waste facilities. Local jurisdictions, in order to comply with the provisions of the Tanner Act, must create hazardous waste management plans that address their hazardous waste permitting process and the appeal process to the state available for local decisions.

California Occupational Safety and Health Administration

The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR §§337-340). The regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings.

California Building Code/California Residential Code

The 2019 California Building Code (CBC) is based on the 2018 International Building Code, which is a model building code developed by the International Code Council that sets rules specifying the minimum acceptable level of safety for building construction in the United States. The CBC is part of the California Code of Regulations (CCR), Title 24 Part 2. The California Residential Code (CRC) is part of the CCR, Title 24 Part 2.5. The CBC is updated periodically. The current version of the CBC was published on July 1, 2019 and became effective on January 1, 2020. Development projects must show compliance with the CBC and/or CRC through the City's development review process, as detailed in Chapter 5 of the RLASCSP. Building permits are submitted and reviewed for compliance prior to obtaining construction and building permits.

California Department of Forestry and Fire Protection (CAL FIRE)

The California Department of Forestry and Fire Protection (CalFire) has mapped fire threat potential throughout California. CAL FIRE ranks fire threats based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate). The rankings include no fire threat, moderate, high, and very high fire threat.

CalFire Strategic Fire Plan 2019

This plan is used by the CalFire to direct and guide its fire management activities for the State Responsibility Area (SRA) throughout California. The mission of CalFire is to serve and safeguard the people and protect the property and resources of California. CalFire responds to emergencies such as fires of all types, vehicle accidents, floods, earthquakes, hazardous material spills, and others within the SRA. CalFire provides direction for fire prevention using fire resource assessments, a variety of available data, mapping and other tools. The plan emphasizes "pre-fire" management, which is a process to assess alternatives to protect assets from unacceptable risk of wildland fire damage and focus on those actions that can be taken in advance of a wildland fire to potentially reduce the severity of the fire and ensure safety. Pre-fire management activities include prescribed burning, fuel breaks, forest health treatments and removal of hazardous vegetation.

REGIONAL AND LOCAL

City of Downey Vision 2025 General Plan

The City of Downey Vision 2025 General Plan (DGP) is a legal document, in the form of a map and accompanying text adopted by the City Council. It serves as a guide to the long-term physical development and growth of the community. In addition, the DGP prepares long-range programs to address further changes in the City. The DGP outlines goals and policies that are applicable to the proposed Project as follows:

Safety Element

- **Goal 5.2.** Protect the health, safety, and welfare of residents, workers, and visitors from the improper use, storage, handling, and disposal of hazardous materials.
    - **Policy 5.2.1.** Monitor the generation, storage, and disposal of hazardous materials.
    - **Policy 5.2.2.** Prevent contamination from hazardous materials.

City of Downey Municipal Code §3400

Chapter 4 – Hazardous Materials Code

Section 3404. Disclosure of a Hazardous Material Information

Any business, which is permitted under a Los Angeles County Certified Unified Program Facility Permit (also referred to as a "Consolidated Permit"), to handle hazardous materials, must annually by March 1st, electronically certify, or submit updated hazardous materials inventory and contingency plan information via the statewide information management system (also known as California Environmental Reporting System [CERS]).

Section 3405. Hazardous Materials Information Management and Record Releases

A) Hazardous Materials Business Plan information shall be electronically maintained on the web-based California Environmental Reporting System (CERS). The management and maintenance of CERS is the responsibility of the California Environmental Protection Agency (Cal/EPA). It will be the responsibility of the Downey Fire Department to maintain access to CERS for mandated regulatory activities.

B) Under the Emergency Planning and Community Right-to-Know Act (EPCRA) [42U.S.C. Section 11001, et seq.] the citizens of Downey, and the public at-large, have the right to know the chemical hazardous present in their community. Downey Fire Department is authorized to release information to help local communities protect public health, safety, and the environment from chemical hazards. Downey Fire's information release shall comply with the requirements set forth in the California Public Records Act [Government Code Section 6250, et seq.], Chapter 6.95 of the California Health and Safety Code Section 25512, et seq., and Title 27 of the California Code of Regulations.

4.7.4 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, *Environmental Checklist* Form, includes questions concerning hazards and hazardous materials. The questions presented in the Initial Study Checklist have been used as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. (Impact 4.7-1);
- 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. (Impact 4.7-2);
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. (Impact 4.7-3);
- Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment. (Impact 4.7-4);
- 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. (Impact 4.7-5);
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. (Impact 4.7-6); and/or
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. (Impact 4.7-7).

METHODOLOGY AND ASSUMPTIONS

Hazardous material includes any material that, because of its quantity, concentration, or physical, chemical, or biological characteristics, poses a considerable present or potential hazard to human health or safety, or to the environment. It refers generally to hazardous chemicals, radioactive materials, and biohazards materials. Hazardous waste, a subset of hazardous material, is material that is to be abandoned, discarded, or recycled, and includes chemicals, radioactive, and bio-hazardous waste (including medical waste). The primary difference between hazardous materials and hazardous wastes is that hazardous materials are produced for specific uses whereas hazardous wastes are the byproducts of various processes.

Hazardous materials are classified based on the form of hazard(s) they pose: flammable, combustible, poisonous, and/or radioactive. Hazardous wastes are classified by the U.S. EPA through a listing process. Listed wastes are those wastes that the U.S. EPA has formally found to be hazardous. Characteristic wastes are those that have not formally been listed but exhibit hazardous features. Universal wastes are common hazardous wastes that are not industry specific but can be found in many types of businesses, institutions, and households. Mixed wastes are those that are both hazardous and radioactive. Hazardous wastes are also classified by the type of hazard(s) they pose, similar to hazardous materials. Hazardous wastes may be ignitable, corrosive, reactive, toxic, or radioactive.

Hazardous material use is common in construction and operations of all types of development, including industrial, commercial, and residential areas. Hazardous materials are used in Los Angeles County for a variety of purposes including manufacturing, service industries, small businesses, agriculture, medical clinics, schools and households. Hazardous materials also pass through the County on the way to other destinations by freeway, rail, and surface street system. However, the County has no direct authority to regulate the transport of hazardous materials on state highways or rail lines. Transportation of hazardous materials by truck and rail is regulated by Caltrans. Caltrans regulations establish criteria for safe handling procedures. The California Health Services Department also regulates hazardous waste hauling.

As described in more detail below, the analysis of hazards and hazardous materials impacts in this section considers the various existing federal, state, and local LORS that apply to hazards and hazardous materials and described above in **Section 4.7.2, Regulatory Framework**.

Through compliance with the existing LORS, the County would be required to use, transport, store, and dispose of hazardous materials using procedures that would avoid hazards or reduce the potential for hazardous materials incidents. Compliance with applicable federal, state, and local LORS is assumed in this analysis, and local and state agencies would be expected to continue to enforce applicable requirements to the extent that they do so now.

4.7.5 IMPACTS AND MITIGATION MEASURES

Impact 4.7-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

The Project would not result in direct construction, but would facilitate and provide a policy framework for future development within the Project area. While the Project does not propose any development, it

can be assumed that future development could potentially result in direct impacts through the physical demolition, destruction, relocation, or alteration of buildings and structures in the Focus Area.

Asbestos-Containing Materials (ACM)

Asbestos, a natural fiber used in the manufacturing of different building materials, has been identified as a human carcinogen. Most friable (i.e., easily broken or crushed) asbestos-containing materials (ACM) were banned in building materials by 1978. By 1989, most major manufacturers had voluntarily removed non-friable ACM (i.e., flooring, roofing, and mastics/sealants) from the market. These materials, however, were not banned completely. The Focus Area includes existing development from and prior to the 1960s; therefore, the presence of ACM is likely in some structures.

Lead-Based Paint

Lead-based paint has been identified by OSHA, the U.S. EPA, and the Department of Housing and Urban Development as a potential health risk to humans, particularly children, based on its effects to the central nervous system, kidneys, and bloodstream. The risk of lead-based paint has been classified by HUD based upon the age and condition of the painted surface. The Focus Area includes existing development from and prior to the 1960s; therefore, the presence of lead-based paint is likely in some structures.

With implementation of **Mitigation Measure (MM) HAZ-1**, and compliance with applicable federal, state, and local regulatory requirements, potential impacts through accident conditions involving the release of hazardous materials (ACMs/LBPs) would be reduced to less than significant levels.

The Project would allow for new development in the Focus Area including commercial, industrial, and residential uses. The use of hazardous materials is common in all of these applications, and the transport of these materials to and from these sites during construction and operation could occur. However, applicable federal, state, and local laws and regulations would continue to apply to these activities. Hazardous materials and wastes are extensively regulated and monitored by federal and state law. The use of hazardous materials is regulated and monitored under EPCRA, RCRA, and the Hazardous Materials Disclosure Program. Transportation of hazardous materials and/or wastes is regulated under RCRA, the Hazardous Materials Transportation Act, Hazardous Wastes Control Law, and California Code of Regulations Title 22. Disposal of hazardous wastes regulated under RCRA, Hazardous Wastes Control Law, and California Code of Regulations (CCR) Title 22. Sections 2729 through 2732 of the CCR provide requirements for the reporting, inventory, and release response plans for hazardous materials. These requirements establish procedures and minimum standards for hazardous material plans, inventory reporting and submittal requirements, emergency planning/response, and training. Compliance with all applicable federal, state and regional regulations would preclude potential impacts to the public or environment.

In addition, hazardous materials conditions may exist as a result of current or historic commercial or industrial uses occurring on or adjacent to future development sites. Excavation and grading activities associated with future development could expose construction workers and the general public to unknown hazardous materials present in soil or groundwater, which would represent a significant impact. Proposed **MM HAZ-1** requires preparation of a project-specific Phase I Environmental Site Assessment (ESA) for any vacant, commercial, and industrial site currently or historically involving hazardous materials or waste. The Phase I ESA would be prepared in accordance with ASTM Standard Practice E 1527-13 or

the Standards and Practices for All Appropriate Inquiry (AAI), prior to any demolition or construction activities. The Phase I ESA would identify specific Recognized Environmental Conditions (RECs), which may require further sampling/remedial activities by a qualified hazardous materials Environmental Professional with Phase II/site characterization experience. If the Phase I ESA reveals RECs, the Environmental Professional would be charged with identifying remedial activities, which would be strictly controlled by local, state, and federal requirements. If unknown wastes or suspect materials are discovered during construction activities, proposed **MM HAZ-2** would instruct the contractor on how to identify and rectify suspected hazardous wastes if inadvertently discovered during construction. Potential impacts involving the accidental discovery of unknown wastes or suspect materials during construction would be reduced to less than significant levels following compliance with all local, state, and federal regulations.

Mitigation Measures

MM HAZ-1 Prior to any renovation, or demolition, grading or building permit approval, a formal Phase I Environmental Site Assessment (ESA) shall be prepared for any vacant, commercial, and industrial properties involving hazardous materials or waste. The Phase I ESA shall be prepared in accordance with ASTM Standard Practice E 1527-13 or the Standards and Practices for All Appropriate Inquiry (AAI), prior to any land acquisition, demolition, or construction activities. The Phase I ESA would identify specific Recognized Environmental Conditions (RECs), which may require further sampling/remedial activities by a qualified hazardous materials Environmental Professional with Phase II/site characterization experience prior to land acquisition, demolition, and/or construction. The Environmental Professional shall identify proper remedial activities, if necessary.

MM HAZ-2 If the contractor discovers unknown wastes or suspect materials during construction that are believed to involve hazardous waste or materials, the contractor shall:

- Immediately cease work in the suspected contaminant's vicinity, and remove workers and the public from the area;
- Notify the County's Project Engineer;
- Secure the area as directed by the Project Engineer; and
- Notify the implementing agency's Hazardous Waste/Materials Coordinator.

The Hazardous Waste/Materials Coordinator shall advise the responsible party of further actions that shall be taken, if required.

Impact 4.7-2: 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. Excavation and grading activities associated with future development could expose construction workers and the general public to unknown hazardous materials present in soil or groundwater, which would represent a significant impact. Therefore, implementation of **MM HAZ-1** would be required, which requires preparation of a project-specific Phase I ESA for any vacant, commercial site currently or historically involving hazardous materials or waste. The Phase I ESA would be prepared

in accordance with ASTM Standard Practice E 1527-13 or the Standards and Practices for All Appropriate Inquiry (AAI), prior to any demolition or construction activities. The Phase I ESA would identify specific Recognized Environmental Conditions (RECs), which may require further sampling/remedial activities by a qualified hazardous materials Environmental Professional with Phase II/site characterization experience. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including those intended to prevent impacts associated with hazardous materials.

Mitigation Measures

No mitigation is required.

Impact 4.7-3: 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?

Less than Significant. Two schools, a preschool and a private school, are located within 0.25 mile of the Focus Area. Any future development within the Specific Plan area would need to adhere to mandatory requirements and regulations related to the emissions or handling of hazardous materials, substances, or wastes near schools to reduce the potential for impacts to schools. Adherence to California Hazardous Waste Control Law, California Health and Safety Code, and Resource Conservation and Recovery Act (RCRA) regulations would reduce potential impacts associated with the accidental release of hazardous materials. As a result, future development within the Specific Plan area would not conflict with any state or local plan aimed at preventing emissions or handling of hazardous materials near schools. Therefore, impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.7-4: 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, could create a significant hazard to the public or the environment?

Less than Significant with Mitigation. As discussed above, portions of the Focus Area are characterized as a hazardous materials site due to soil and groundwater from USTs including a former tank location (County EIR Figure 3.7-1) and USTs at the Hollydale Yard in the southwestern portion of the Focus Area. Additionally, groundwater under the Focus Area appears to be impacted by contamination associated with the Anadite facility, located approximately 0.5 mile northwest of the Focus Area. Records available through Geotracker indicate ongoing cleanup is necessary within Area 10 and Hollydale Yard in order to close the open regulatory oversight.

Implementation of **MM HAZ-1** and **MM HAZ-2** would ensure that impacts from hazardous material such as ordnance from the former use would be investigated and remediated prior to future development on this site. Impacts are therefore less than significant with mitigation incorporated.

Mitigation Measures

See MM HAZ-1 and MM HAZ-2 above.

Impact 4.7-5: Would the project be located within an airport land use plan or within two miles of a public airport or public use airport, and as a result create a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The Focus Area is not located within two miles of a public airport or public use airport. Therefore, demolition, construction, and operational activities associated with future development associated with the Specific Plan would not result in a safety hazard or excessive noise for people in the area, and there would be no impact.

Mitigation Measures

No mitigation is required.

Impact 4.7-6: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant. The Project would not impair or physically interfere with an adopted emergency response plans or emergency evacuation plan. The City of Downey Fire Department would continue to provide fire protection services to the Focus Area. The Fire Department responds to both fire and emergency medical services incidents. Primary access to all major roads would be maintained during construction of future developments at the Focus Area. Therefore, impacts associated with adopted emergency response or evacuation plans would be less than significant. Emergency services and access is further described in **Section 4.12: Public Services and Recreation**.

Mitigation Measures

No mitigation is required.

Impact 4.7-7: Would the project expose people or structure, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Specific Plan area is not located within an area designated as a very high fire hazard severity area. Therefore, there would be no impact either directly or indirectly, to a significant loss, injury or death involving wildland fires during temporary construction of the proposed Project, temporary demolition of additional structures on the South Campus, and long-term operation of the proposed Project.

Mitigation Measures

No mitigation is required.

4.7.6 CUMULATIVE IMPACTS

Impacts associated with hazardous materials are often site-specific and localized. The PEIR evaluates Recognized Environmental Conditions (RECs), in connection with the Focus Area and surrounding area. RECs are defined under ASTM Standard Practice for Environmental Site Assessments (ESAs) as "the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substance or petroleum products into structures on the property or into the ground,

groundwater, or surface water of the property." Regarding the off-site RECs, the database search documents the findings of various governmental database searches regarding properties with known or suspected releases of hazardous materials or petroleum hydrocarbons within a search radius of up to one mile from the Focus Area and serves as the basis for defining the cumulative impacts study area.

As previously stated, the Project does not propose development but would facilitate future development with a maximum buildout capacity of 700 DU and 1,130,000 SF of non-residential land uses within the Focus Area. As discussed above, the Project could result in potentially significant impacts concerning disposal of hazardous materials during construction phases of future development. However, with implementation of the **MM HAZ-1** and **MM HAZ-2**, Project implementation would not cause a substantial adverse effects and a less than significant impact would occur. Therefore, the Project's contribution toward cumulative impacts is not otherwise considered to be cumulatively considerable.

Potential impacts of future development within the Focus Area are project-specific and would require project-level evaluation prior to approval of permits when future development is proposed. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, as well as compliance with the federal, state, and local regulatory framework. Projects would be subject to **MM HAZ-1** and **MM HAZ-2** concerning preparation of a Phase I ESA and protocol for identification of hazardous materials. Additionally, cumulative development will undergo environmental and design review on a project-by-project basis pursuant to the State CEQA Guidelines to evaluate potential impacts to hazards and hazardous materials. Where significant or potentially significant impacts are identified, implementation of all feasible mitigation will be required to reduce impacts to less than significant levels.

Therefore, the cumulative impacts to hazards and hazardous materials associated with the Project's incremental effects and those of the cumulative projects will be less than significant with mitigation incorporated.

4.7.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable hazards and hazardous waste impacts have been identified.

4.7.8 REFERENCES

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4.8 HYDROLOGY AND WATER QUALITY

4.8.1 INTRODUCTION

The purpose of this section is to identify existing surface hydrology, groundwater, water quality and drainage patterns of the area and potential effects from implementation of the proposed Rancho Los Amigos South Campus Specific Plan (RLASCSP) Project. No hydrological surveys were conducted for this analysis. The Focus Area was evaluated in this PEIR at a programmatic level based on information available to the City where reasonably foreseeable, direct, and indirect physical changes in the environment could be considered. Further analysis was not conducted, as it would be speculative to base an analysis of potential impacts resulting from future development per the RLASCSP Project.

The analysis of this section is based on the County of Los Angeles Rancho Los Amigos South Campus Project EIR (County Project EIR) Section 3.8: Hydrology and Water Quality, other recent environmental documents, as well as and applicable information from Caltrans, Los Angeles County and the Los Angeles Regional Water Quality Control Board. The analysis conducted for the County Project EIR is representative of general site conditions throughout the South Campus.

4.8.2 AFFECTED ENVIRONMENT

REGIONAL HYDROLOGY

Watershed

The Specific Plan area, inclusive of the Focus Area is within the Los Angeles River watershed. The Los Angeles River watershed encompasses approximately 824 square miles. Nearly 500 square miles of the watershed consists of developed, urbanized land. Stormwater runoff generated from the Specific Plan area is conveyed via sheet flow or underground pipe network to Reach 2 of the Los Angeles River, which is approximately 0.70 miles west of the Focus Area. The Los Angeles River ultimately discharges to the Pacific Ocean.

Storm Drain Facilities

Regional drainage facilities in the area include Hollydale Line A and Hollydale Line B, which are owned and maintained by the Los Angeles County Flood Control District.

Surface Water Quality

As noted, the Specific Plan area discharges to Reach 2 of the Los Angeles River, and ultimately to the Pacific Ocean. Intermittent beneficial uses of Los Angeles River include agricultural supply, groundwater recharge and warm freshwater habitat. Potential beneficial uses include municipal and domestic supply, industrial service supply, and wildlife habitat. The following impairments are listed on the 2014/2016 Clean Water Act 303(d) List of Impaired Waterbodies.

Los Angeles River, Reach 2

- Trash
- Ammonia
- Nutrients (Algae)
- Copper
- Lead
- Indicator Bacteria
- Oil

Los Angeles River, Reach 1

- Copper, Dissolved
- Zinc, Dissolved
- Cadmium
- Cyanide
- pH
- Ammonia
- Nutrients (Algae)
- Indicator Bacteria
- Trash

Los Angeles River Estuary

- Chlordane
- PCBs (Polychlorinated biphenyls) (sediment)
- Trash
- DDT (sediment)
- Toxicity

Pacific Ocean (San Pedro Bay Near/Off Shore Zones)

- Total DDT (sum of 4,4'- and 2,4'- isomers of DDT, DDE, and DDD)
- PCBs (Polychlorinated biphenyls)
- Chlordane
- Toxicity

EXISTING GROUNDWATER RESOURCES

A groundwater basin is generally defined as a hydrogeologic unit containing one large aquifer as well as several connected and interrelated aquifers that has reasonably well-defined boundaries and areas of recharge and discharge. The Central Basin receives natural inflows from the rainfall and snowmelt, artificial inflows from imported and recycled water, as well as groundwater underflow from adjacent basins. Surface water slowly percolates through the ground to aquifers.

As noted in the Urban Water Management Plan prepared for the City of Downey, the City's water supply sources include groundwater pumped from the Central Basin and supplemental imported water purchased from the Central Basin Municipal Water District when local demand exceeds supply. The City pumps groundwater from 20 active wells within the City.

WATER QUALITY

Urban runoff, both dry and wet weather, discharges into storm drains, and in most cases, flows directly to creeks, rivers, lakes, and the ocean. Polluted runoff can have harmful effects on drinking water, recreational water, and wildlife. Urban runoff pollution includes a wide array of environmental, storm water characteristics depend on site conditions (e.g., land use, impervious cover, and pollution prevention practices), rain events (duration, amount of rainfall, intensity, and time between events), soil type and particle sizes, the amount of vehicular traffic, and atmospheric deposition. Major pollutants typically found in runoff from urban areas include sediments, nutrients, oxygen-demanding substances, heavy metals, petroleum hydrocarbons, pathogens, and bacteria. Most urban storm water discharges are considered non-point sources.

4.8.3 REGULATORY SETTING

FEDERAL

Clean Water Act

Pursuant to Section 404 of the Clean Water Act (33 U.S. Code [USC] §1251 et seq.; CWA), the U.S. Army Corps of Engineers (USACE) is authorized to regulate any activity that would result in the discharge of dredged or fill material into waters of the United States (including wetlands), which include those waters listed in 33 Code of Federal Regulations (CFR) 328.3 (as amended at 80 Federal Register [FR] 37104, June 29, 2015). The USACE, with oversight from the U.S. Environmental Protection Agency (U.S. EPA), has the principal authority to issue CWA Section 404 permits. The USACE would require a Standard Individual Permit (SIP) for more than minimal impacts to waters of the United States as determined by the USACE. Projects with minimal individual and cumulative adverse effects on the environment may meet the conditions of an existing Nationwide Permit (NWP).

A water quality certification or waiver pursuant to Section 401 of the CWA is required for all Section 404 permitted actions. The RWQCB, a division of the State Water Resources Control Board (SWRCB), provides oversight of the 401-certification process in California. The RWQCB is required to provide "certification that there is reasonable assurance that an activity that may result in the discharge to waters of the United States will not violate water quality standards." Water Quality Certification must be based on the finding that proposed discharge will comply with applicable water quality standards.

The National Pollutant Discharge Elimination System (NPDES) is the permitting program for discharge of pollutants into surface waters of the United States under Section 402 of the CWA.

Clean Water Act Section 402 – National Pollutant Discharge Elimination System

In 1972, the CWA was amended to prohibit the discharge of pollutants to waters of the United States unless the discharge is in compliance with a NPDES permit. The NPDES permit program focuses on point source discharges from municipal wastewater plants, but also applies to industrial discharges, construction site dewatering discharges and stormwater discharges to surface waters. Municipalities, publicly owned treatment works and most industries in the U.S. are now required to obtain an NPDES permit for discharges, including stormwater runoff. NPDES permits regulate discharge of "pollutants from point sources to waters of the United States" to ensure that the discharges do not adversely affect surface water quality or beneficial uses. In addition to CWA Section 402, NPDES permits are authorized by CWC §13370 and Chapters 3 and 4 of CCR Title 23. The responsibility for issuing NPDES permits in California has been delegated to the nine Regional Water Quality Control Boards (RWQCB), subject to review and approval by the Regional Administrator (U.S. EPA Region IX, San Francisco).

Federal Emergency Management Agency (FEMA)

The Federal Emergency Management Agency's (FEMA) primary mission is to reduce the loss of life and property and protect the nation from all hazards, including flooding. FEMA is responsible for administering the National Flood Insurance Program (NFIP), which enables property owners in participating communities to purchase insurance as protection against flood losses in exchanges for state and community floodplain management regulations that reduce future flood damages. In communities that participate in the NFIP, mandatory flood insurance purchase requirements apply to all properties within

Zone A, which are communities subject to a 100-year flood event. In addition to providing flood insurance and reducing flood damages through floodplain management regulations, the NFIP identifies and maps the floodplains of Flood Insurance Rate Maps (FIRM).

STATE

Porter-Cologne Water Quality Control Act

California's Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act) grants the SWRCB and the RWQCB power to protect surface water and groundwater quality and is the primary vehicle for implementing California's responsibilities under the federal Clean Water Act. The SWRCB is divided into nine regions, each overseen by a RWQCB. The SWRCB is responsible for protecting California's surface waters and groundwater supplies. The City of Downey is included with the jurisdiction of the Los Angeles RWQCB.

Each RWQCB must formulate and adopt a Water Quality Control Plan (Basin Plan) for its region. The Basin Plan must conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its State Water Policy. The Basin Plan establishes beneficial uses for surface and groundwater in the region, and sets forth narrative and numeric water quality standards to protect those beneficial uses. Basin plans are updated every three years and provide the basis of determining waste discharge requirements, taking enforcement actions, and evaluating clean water grant proposals. The Porter-Cologne Act also states that an RWQCB may include water discharge prohibitions applicable to particular conditions, areas, or types of waste within its regional plan. The Porter-Cologne Act is also responsible for implementing Clean Water Act Sections 401 and 402 and 303(d) to SWRCB and RWQCBs.

Low Impact Development – Sustainable Storm Water Management

In 2005, the SWRCB adopted sustainability as a core value for all activities and programs carried out by the SWRCB. Low Impact Development (LID) is a sustainable practice that promotes water retention and the protection of water quality. LID design techniques include features that increase infiltration, filtration, storing of water, reduce evaporation, and detain runoff.

Water Quality Orders (SWRCB)

The SWRCB has adopted an NPDES General Permit for construction activities, known as the Construction General Permit (Construction General Permit). The current Construction General Permit became effective on July 1, 2010. Where projects would disturb one or more acres of soil, or where a project would disturb less than one acre but is a part of larger development plan that totals one or more acres, the NPDES permitting process requires coverage under the General Construction Permit. The Construction General Permit requires the development of a Storm Water Pollution Prevention Plan (SWPPP). The Construction General Permit requires the development and implementation of a SWPPP. The SWPPP must contain a site map(s) which shows the construction site perimeter, existing and proposed buildings, lots, roadways, storm water collection and discharge points, general topography both before and after construction, and drainage patterns across a project site. The SWPPP must list Best Management Practices (BMPs) that the discharger would use to protect storm water runoff and the placement of said BMPs. Additionally, the SWPPP must contain a Construction Site Monitoring Program to demonstrate that the site is in compliance with the Construction General Permit.

CCR Title 22 - Recycled Water

Under CCR Title 22, the California Department of Health Services (DHS) and the local RWQCB regulate the use and quality of recycled water. The local RWQCB is the permitting authority and DHS regulates the health standards that apply to recycled water use in the state. Chapter 4 of CCR Title 22 establishes recycled water quality standards and treatment reliability criteria dependent upon the end use of recycled water to protect public health. Both secondary- and tertiary-treated wastewater can meet Title 22 standards, dependent upon the end use of the water. Use of recycled water for groundwater recharge is reviewed by DHS on a case-by-case basis.

REGIONAL AND LOCAL

County Waste Discharge Requirements

The Los Angeles County Flood Control District, the County of Los Angeles, and the City of Downey along with 83 other incorporated cities therein (Permittees) discharge pollutants from their municipal separate storm sewer (drain) systems (MS4s). Stormwater and non-stormwater enter and are conveyed through the MS4 and discharged to Los Angeles Region surface water bodies. These discharges are regulated under countywide waste discharge requirements contained in the NPDES Permit. The MS4 Permit Order provides the revised waste discharge requirements for MS4 discharges within the Los Angeles County watersheds, which includes Gardena. The MS4 Permit Order, which became effective December 28, 2012, supersedes Order No. 01-182. Los Angeles County uses its LID Ordinance to require that projects comply with NPDES MS4 Permit water quality requirements. The MS4 Permit Order requires development and implementation of a Planning and Land Development Program for all "New Development" and "Redevelopment" projects subject to the Order.

City of Downey General Plan, Vision 2025

The City of Downey's General Plan, Downey Vision 2025 (DGP), is a long-range planning document that guides community development and growth throughout the City. The City adopted the General Plan 2025 in 2005. Goals and policies applicable to the proposed Project are as follows:

Conservation Element

The Conservation Element outlines issues, goals, policies, and programs related to water resources, as follows:

- **Goal 4.2:** Prevent the contamination of groundwater
  - **Policy 4.2.1:** Monitor and improve groundwater quality
- **Goal 4.3:** Reduce the contaminant level at beaches and oceans.
  - **Policy 4.3.1:** Reduce the contaminant level of stormwater and urban runoff generated within Downey.

Safety Element

The Safety Element outlines issues, goals, policies, and programs related to flooding hazards, as follows:

- **Goal 5.6**: Minimize potential adverse impacts from flooding.
  - **Policy 5.6.1:** Protect life and property from flooding hazards.

- **Policy 5.6.2:** Minimize the potential for flooding due to stormwater generation.

City of Downey Municipal Code §5702

Article V – Sanitation of the Downey Municipal Code contains Chapter 7 – Storm Water and Urban Runoff Pollution and Conveyance Controls, which outlines a number of requirements, related to water quality. Section 5702 identifies prohibited pollutants; they are:

1. Any water constituent found at concentrations or levels that may potentially cause a beneficial use impairment in a downstream receiving water body that has been nominated or is currently on a Los Angeles RWQCB 303(d), Monitoring, Enforceable Limit, or similar list;
2. Any sediment, settleable, or suspended solid;
3. Any living or dead animal or their biological waste products;
4. Any food, food processing or medical waste;
5. Any thermal, color, conductive, oxygen demanding, growth inducing, corrosive, or radioactive waste;
6. Any chemical waste, salt, organic compound, pesticide or metal;
7. Any hydrocarbon based fuel, oil, lubricant, fluid, or additive; and
8. Any substance designated as a pollutant by the Los Angeles RWQCB. (Added by Ord. 1036, adopted 01-28-97; amended by Ord. 1142, adopted 02-11-03; amended by Ord. 1320, adopted 11-12-13; amended by Ord. 14-1330, adopted 4-22-14).

City of Downey Municipal Code §5705

Municipal Code §5705 addresses BMP requirements for urban runoff reduction. The owner, occupant or other person in charge of daily operation or maintenance of each parcel in the City is required to comply with BMP requirements in order to prevent or reduce the discharge of pollutants to achieve water quality standards/receiving water limitations.

City of Downey Municipal Code §8700

Article VIII Building Regulations of the Downey Municipal Code contains Chapter 8 – Floodplain Management, Grading, and Paving, §8700 Floodplain Management Regulations, which outlines methods of reducing flood losses. As summarized, they are:

- Restrict or prohibit uses which are dangerous to health, safety and property due to water or erosion hazards, or which result in damaging increases in erosion or flood heights or velocities;
- Require uses vulnerable to floods be protected against flood damage at the time of construction;
- Control the alteration of natural floodplains, stream channels, and natural protective barriers;
- Control filling, grading, dredging and other development which may increase flood damage; and
- Prevent or regulating the construction of flood barriers which will unnaturally divert floodwaters or which may increase flood hazards in other areas.

4.8.4 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist, includes questions concerning geologic hazards. The questions presented in the Initial Study Checklist have been used as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

- Violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or groundwater quality.
- Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
- 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 surface in a manner that 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; and/or
  - 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.
- In flood, tsunami or seiche zones, risk release of pollutants due to project inundation.
- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

METHODOLOGY AND ASSUMPTIONS

The proposed Project and associated land uses are analyzed at a programmatic level of detail. General information regarding pre- and post-project hydrology and water quality has been reviewed and summarized from several sources, including City, County and state documents. This EIR acknowledges that existing codes and regulations will address most issues through design and performance standards as specific projects are proposed within the RLASCSP area.

4.8.5 IMPACTS AND MITIGATION MEASURES

Threshold 4.8-1:	**Would the project violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or groundwater quality?**

Less than Significant. The proposed RLASCSP Project does not propose any development and all future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including those intended to protect water quality. Future development could result in potential impacts related to water quality over three different periods:

- During the earthwork and construction phase, where the potential for erosion, siltation, and sedimentation would be the greatest;

- Following construction, before the establishment of ground cover, when the erosion potential may remain relatively high; and
- After project completion, when impacts related to sedimentation would decrease markedly but those associated with urban runoff would increase.

Urban runoff, both dry and wet weather, discharges into storm drains, and in most cases, flows directly to creeks, rivers, lakes, and the ocean. Polluted runoff can have harmful effects on drinking water, recreational water, and wildlife. Urban runoff pollution includes a wide array of environmental, storm water characteristics depend on site conditions (e.g., land use, impervious cover, and pollution prevention practices), rain events (duration, amount of rainfall, intensity, and time between events), soil type and particle sizes, the amount of vehicular traffic, and atmospheric deposition. Major pollutants typically found in runoff from urban areas include sediments, nutrients, oxygen-demanding substances, heavy metals, petroleum hydrocarbons, pathogens, and bacteria. Most urban storm water discharges are considered non-point sources.

CONSTRUCTION

Short-term impacts related to water quality can occur during the earthwork and construction phases of future development projects. During this phase, the potential for erosion, siltation, and sedimentation would be the greatest. Additionally, impacts could occur prior to the establishment of ground cover, when the erosion potential may remain relatively high. Future development projects facilitated by the RLASCSP Project would be subject to compliance with the established regulatory framework pertaining to water quality. If future developments disturb more than one acre of land surface, they would be required to obtain coverage under the NPDES storm water program. The NPDES Construction General Permit program calls for the implementation of BMPs to reduce or prevent pollutant discharge from these activities to the Maximum Extent Practicable for urban runoff and meeting the Best Available Technology Economically Achievable and Best Conventional Pollutant Control Technology standards for construction storm water. Construction activities would be required to comply with a project-specific SWPPP that identifies erosion-control and sediment-control BMPs that would meet or exceed measures required by the Construction Activity General Permit to control potential construction-related pollutants. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized.

Additionally, the future development projects facilitated by the RLASCSP would be required to comply with applicable local and regional storm water and urban runoff pollution and conveyance requirements. The purpose of these regulations is to manage storm water flows from development projects, both to prevent erosion and to protect and enhance existing water-dependent habitats. These requirements would ensure that potential impacts from construction of developments facilitated by the RLASCSP Project related to soil erosion, siltation, and sedimentation remain less than significant and avoid violation to any water quality standards or waste discharge requirements.

OPERATIONS

Future developments facilitated by the RLASCSP Project would be required to install, implement, and maintain the BMPs identified in CMC §5705 including, but not limited to erosion management; materials storage; inspection, maintenance, repair, upgrade of BMPs; and minimum BMPs specified for landscaping, property maintenance, and motor vehicle maintenance.

All new development would also be required to comply with existing water quality standards and waste discharge regulations set forth by the State Water Quality Control Board. Future developments facilitated by the RLASCSP Project would comply with these regulations and waste discharges would be connected to the public wastewater system.

Future development projects would be required to adhere to all federal, state, and local requirements for avoiding violation of water quality standards during construction and operations. Considering these requirements, future development associated with implementation of the RLASCSP Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Threshold 4.8-2:	**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?**

Less than Significant. Groundwater recharge would not be significantly impacted by the proposed Project. Downey is located in a highly urbanized setting and is mostly built out. Groundwater recharge for the Central Basin is accomplished naturally through infiltration in upstream areas, and through the import of purchased water from the Metropolitan Water District and recycled water from the Whittier and San Jose Treatment Plants to the Rio Hondo and San Gabriel River Spreading Grounds upstream of the City.

Future development facilitated by the RLASCSP Project would be required to adhere to all federal, state, and local requirements for avoiding and minimizing construction and operations impacts to groundwater supplies, including the City's Storm Water and Urban Runoff Pollution and Conveyance Controls Ordinance (DMC Chapter 5700). Considering these requirements, future development associated with the implementation of the RLASCSP Project would not decrease ground water supplies or interfere substantially with ground water recharge such that the RLASCSP Project may impede sustainable groundwater management of the basin. Therefore, impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Threshold 4.8-3:	**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 surface in a manner that would: result in substantial erosion or siltation on-or off-site; substantially increase the rate or amount of surface runoff in a manner which could result in flooding on- or off-site; or create or contribute runoff water which could exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

Less than Significant. Please see discussion and analysis in the above statements regarding the required incorporation of SWPPP measures, BMPs, and other NPDES requirements that regulate water quality.

The Specific Plan area, inclusive of the Focus Area is primarily flat and has been historically used for institutional and hospital uses that define the existing drainage pattern and infrastructure facilities in this urban environment. The Project would not alter the course of a stream or river, or significantly alter the basic drainage pattern of the site. All urban runoff is and would continue to be collected through existing or upgraded storm drain facilities, and appropriately managed prior to outfall to the Los Angeles River to the west.

Future development facilitated by the RLASCSP Project would be required to adhere to all federal, state, and local requirements for avoiding construction and operations impacts that could substantially alter the existing drainage pattern or alter the course of a stream or river, including the City's Storm Water and Urban Runoff Pollution and Conveyance Controls Ordinance (DMC Chapter 5700).

Considering these requirements, future development facilitated by implementation of the RLASCSP Project would not substantially alter the existing drainage pattern of the site or area. This includes no alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site, create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems, or provide substantial additional sources of polluted runoff, or impede or redirect flood flows. Therefore, impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Threshold 4.8-4: In flood, tsunami or seiche zones, would the project risk release of pollutants due to project inundation?

Less than Significant. The entire RLASCSP is located in FEMA Zone X (0.2% annual chance of flooding)[1], which indicates a very low flood hazard potential. The site is not in a floodplain, flood zone, nor is the area susceptible to tsunami or seiche.

Future development facilitated by the RLASCSP Project would be required to adhere to all federal, state, and local requirements for avoiding and minimizing impacts related to flood hazards, tsunami, or seiches, including the DMC standards. Considering these requirements, the future development facilitated by the RLASCSP Project would not result in significant increased risk concerning release of pollutants due to inundation, tsunami, or seiche zones. Therefore, RLASCSP Project impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Threshold 4.8-5: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant. The City's Storm Water and Urban Runoff Pollution and Conveyance Controls Ordinance (DMC Chapter 5700) aims to protect water resources and improve water quality. The ordinance

[1] FEMA Flood Insurance Rate Map.

causes use of management practices by the City and its citizens that will reduce the adverse effects of polluted runoff discharges on waters of the state and control contribution of pollutants to the City's MS4, and to ensure that the City is compliant with RWQCB Los Angeles Region Order No. R4-2012-0175 and with applicable state and federal law.

MS4 Permit conformance entails considerations such as receiving water limitations (e.g., Basin Plan criteria), waste load allocations, and numeric water quality effluent limitations. The City is a co-permittee of the regional MS4 Permit and has implemented several regulations to ensure conformance with MS4 Permit requirements. The MS4 Permit implements a regional strategy for water quality and related concerns and mandates a watershed-based approach that often encompasses multiple jurisdictions. Conforming to the permit and reducing runoff and pollutant discharges involves inter-jurisdictional planning and coordination to employ best practices, including low-impact design measures, monitoring, reporting, and enforcement.

Future developments facilitated by the RLASCSP Project would be required to prepare a stormwater management plan and incorporate stormwater standards manual requirements into design documents to minimize potential impacts to water quality. Submitted materials would be required to demonstrate how the requirements of this stormwater ordinance would be met, and the permit or approval would not be approved unless the decision-maker determines that the application complies.

Further, dischargers whose projects disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to comply with the General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ). The Construction General Permit requires the development of a SWPPP by a certified Qualified SWPPP Developer.

Future development facilitated by the RLASCSP Project would be required to adhere to all federal, state, and local requirements for avoiding and minimizing construction and operations impacts to prevent conflicts with or obstruction of implementation of a water quality control plan or sustainable groundwater management plan, including the Basin Plan. Further, future development facilitated by the RLASCSP Project would not prevent compliance with the City's Clean Water Program from ensuring that MS4 Permit and Basin Plan requirements are met. As a result, future development facilitated by the RLASCSP Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation is required.

4.8.6 CUMULATIVE IMPACTS

The City of Downey and Central Basin are the geographical area considered for cumulative impacts to hydrology and water quality. The combination of the proposed Project together with related past, present, and reasonably foreseeable future projects, as provided in **Table 3-1: Cumulative Projects List**, could involve actions with the potential to impact hydrology and water quality.

As previously stated, the Project does not propose development but would facilitate future development with a maximum buildout capacity of 700 DU and 1,130,000 SF of non-residential land uses within the Focus Area. As discussed above, potential impacts concerning hydrology and water quality would be site-specific and would require evaluation on a case-by-case basis at the project level when future development is proposed. Each project would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements to address potential hydrology and water quality impacts. Therefore, the Project's contribution toward cumulative impacts is not otherwise considered to be cumulatively considerable.

4.8.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts have been identified.

4.8.8 REFERENCES

City of Downey. January 2005. Vision 2025 General Plan. Available at https://www.downeyca.org/home/showpublisheddocument/154/636977201799600000. Accessed May 15, 2021.

Federal Emergency Management Agency (FEMA) Flood Insurance Map, Panel 06037C1820F. (2008). Retrieved from https://msc.fema.gov/portal/search?AddressQuery=downey%2C%20ca. Accessed May 20, 2021.

SWRCB. (2021). Final 2014/2016 California Integrated Report (Clean Water Act Section 303(d) List / 305(b) Report) Map. https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml.

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Stetson Engineers Inc. (2018) Final 2015 Urban Water Management Plan. Available at https://www.downeyca.org/home/showpublisheddocument/2428/636985752928000000

4.9 LAND USE AND PLANNING

4.9.1 INTRODUCTION

This section of the PEIR analyzes the potential effects on land use and planning programs that would result from implementation of the Rancho Los Amigos South Campus Specific Plan Project (proposed Project). This section evaluates consistency with the City of Downey Vision 2025 General Plan (DGP).

This PEIR section relies upon and incorporates by reference in its entirety the County of Los Angeles Rancho Los Amigos South Campus Project Final EIR (County Project EIR) Section 3.9, Land Use and Planning. The analysis conducted for the County Project EIR is representative of general site conditions and sensitivity throughout the South Campus. That EIR and the detailed studies therein adequately address the air quality present within the Specific Plan area and applicable mitigation strategies.

4.9.2 AFFECTED ENVIRONMENT

EXISTING LAND USE

The Rancho Los Amigos South Campus Specific Plan (RLASCSP) area, inclusive of the Focus Area (Project site) is located within a highly developed and urbanized area of the City of Downey (City). The Focus Area is located within the southern portion of the Rancho Los Amigos South Campus and includes the Rancho Los Amigos Historic District (Historic District). The site contains 51 buildings and structures of which 27 are identified as contributors to the Historic District. Five of the existing buildings in the RSLSCSP area: Administration Building (LACO No. 1100); Casa Consuelo (LACO No. 1238); Power Plant (LACO No. 1300); the Water Tower (LACO No. 1301); and the Shop, Laundry, and Ice Plant (LACO No. 1302) are identified as individually eligible for listing in the National Register of Historic Places (National Register).[1] All but Casa Consuelo are within the Focus Area. The Moreton Bay Fig Tree is a contributing feature to the Historic District and is within the Focus Area.

The Focus Area is comprised entirely of institutional land uses with approximately 286,842 SF of existing buildings of which 193,900 SF are vacant. The Specific Plan area is characterized by hardscape, including internal roadways, pedestrian circulation paths, building courtyards, and parklike landscaping. Certain hardscape features and landscape features, together with the spatial relationships between the contributing buildings, are remnants of the original 1888 Rancho Los Amigos Site Plan, which itself constitutes a contributor to the Historic District.

Multiple County facilities are located in and around the Focus Area including the Los Angeles County Public Health Laboratory, and Sheriff's Crime Laboratory, as well as a childcare facility to the north. Other municipal facilities within the Focus Area include the Los Angeles County Animal Shelter and Department of Public Works east of Garfield Avenue.

Table 4.9-1: Existing Land Uses provides a summary of on-site and surrounding land uses near the Focus Area.

[1] Environmental Science Associates (June 2020). *Rancho Los Amigos South Campus Project Final EIR (SCH# 201708017).*

Table 4.9-1: Existing Land Uses	
Direction	**Land Use**
Focus Area	Institutional Uses; Rancho Los Amigos Historic District
North	Consuelo Street curves through the Focus Area and runs east to west and north to south. Descanso Street runs generally northeast to southwest, and Flores Street generally runs southeast to west along the Focus Area's northern boundary. Existing industrial use buildings and historic structures within the Specific Plan area are located north of these roadways.
South	Gardendale Street is to the south, with single-family residential uses in the City of South Gate south of Gardendale Street.
East	Single-family residential neighborhoods and St. Pius X – St. Matthias Academy
West	Industrial facilities and single- and multi-family neighborhoods in the City of South Gate

EXISTING GENERAL PLAN DESIGNATIONS

Exhibit 2-6: Existing General Plan Designations (see **Section 2: Project Description**) depicts land use designations associated with the RLASCSP area. The Focus Area is designated Commercial Manufacturing (CM), which is intended for the following uses:

> The Commercial Manufacturing designation is intended to provide greater flexibility for providing land uses that generate employment, such as shopping centers, major offices, and light industrial. The intensity of the Commercial Manufacturing designation should fall within a range of floor area ratio between 0.5:1 and 0.6:1.

EXISTING ZONING DESIGNATIONS

Exhibit 2-7: Existing Zoning Designations (see **Section 2: Project Description**) depicts the zoning designations for the Project area. The Focus Area is zoned Single-Family Residential (R-1 5,000), Rancho Business Center Specific Plan (SP 88-1), and Rancho Los Amigos Specific Plan (SP 85-1), with the vast majority defined by existing Specific Plans, as described below:[2]

- **R-1 5,000** provides for development of single-family residential areas. This zone is further intended to provide a basis for the planning of related amenities, such as parks, schools, public utilities, streets and highways, and other community facilities. "R-1 5000" is a sub-zone within the R-1 designation that requires a minimum lot size of 5,000 SF.[3]
- **SP 88-1** encompasses approximately 121 acres of the RLASCSP. The SP 88-1 designation is intended to provide a comprehensive framework that promotes development of a master planned, light industrial business park.
- **SP 85-1** encompasses approximately 14 acres at the RLASCSP area's northwest corner. The SP 85-1 designation is intended to serve as the first step for future development of light manufacturing within the entire Rancho Los Amigos area.

[2] Full text for SP 88-1 and 85-1 can be found on the City of Downey's website under Special Zoning.

[3] City of Downey. (2020). *Downey Municipal Code Article IX, Section 3, Section 9312.02*. Retrieved from http://qcode.us/codes/downey/?topic=ix&frames=on.

4.9.3 REGULATORY SETTING

STATE

California Planning and Zoning Law

The legal framework in which California cities and counties exercise local planning and land use functions is set forth in the California Planning and Zoning Law, §§65000 - 66499.58. Under State of California planning law, each city and county must adopt a comprehensive, long-term general plan. State law gives cities and counties wide latitude in how a jurisdiction may create a general plan, but there are fundamental requirements that must be met. These requirements include the inclusion of seven mandatory elements described in the Government Code, including a section on land use. Each of the elements must contain text and descriptions setting forth objectives, principles, standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and mitigation measures.

Subdivision Map Act

The Subdivision Act (CGC §66410, et seq.) establishes statewide uniformity in local subdivision procedures, while giving the cities and counties the authority to regulate the design and improvement of subdivisions, require dedications of public improvements or related impacts fees and require compliance with the objectives and policies of the general plan. This includes the authority to approve and design street alignments, grades and widths, drainage and sanitary facilities, lot size and configuration, traffic access and other measures, "as may be necessary or convenient to ensure consistency with, or implementation of, the general plan or any applicable specific plan" (CGC §§66418 and 66419). Accordingly, these regulatory powers are the basis by which the City of Downey promotes and implements the various policies and procedures outlined in the DGP.

Sustainable Communities and Climate Protection Act of 2008

The Sustainable Communities Act of 2008 (Senate Bill [SB] 375, Chapter 728, Statutes of 2008) provides a means for achieving greenhouse gas (GHG) emissions goals through the reduction in greenhouse gas emissions of cars and light-duty trucks. SB 375 built on the foundation of the California Global Warming Solutions Act of 2006, also known as Assembly Bill (AB) 32, signed into law by then-Governor Arnold Schwarzenegger. AB 32 focused on reducing GHG emissions in California and requires the California Air Resources Board (CARB) to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020. SB 375 seeks to coordinate land use decisions made at the local (city and county) level with regional transportation planning. By coordinating these efforts, it is envisioned that vehicle congestion and travel can be reduced resulting in a corresponding reduction in emissions. SB 375 directed CARB to set regional targets to reduce emissions and regional plans are required to identify in their regional transportation plan/sustainable communities' strategy how they will meet these targets.

SB 375 has three major components:

- Using the regional transportation planning process to achieve reductions in emissions consistent with AB 32's goals.
- Offering California Environmental Quality Act (CEQA) incentives to encourage projects that are consistent with a regional plan that achieves emissions reductions.

- Coordinating the Regional Housing Needs Allocation Assessment (RHNA) process with the regional transportation process while maintaining local authority over land use decisions.

An SCS is a required component of the RTP. The SCS is an emissions reduction strategy for the region which, in combination with transportation policies and programs, strives to reduce emissions and, if feasible, helps meet CARB's targets for the region. An alternative planning strategy (APS) must be prepared if the SCS is unable to reduce emissions and achieve the emissions reduction targets established by CARB. Certain transportation planning and programming activities must be consistent with the SCS; however, SB 375 expressly provides that the SCS does not regulate the use of land, and further provides that local land use plans and policies (e.g., general plan) are not required to be consistent with either the RTP or SCS. CARB set the following reduction targets for SCAG: reduce per capita emissions 8 percent below 2005 levels by 2020 and 13 percent below 2005 levels by 2035.

California Office of Planning and Research (OPR) General Plan Guidelines

To assist local governments in meeting general plan requirements, the OPR is required to adopt and periodically revise guidelines for the preparation and content of general plans (Government Code §65040.2). These are advisory guidelines, not mandated requirements, and serve as a reference tool for cities and counties in the preparation of local general plans. The guidelines include information on the required contents of a general plan, sustainable development and environmental justice, formatting, public participation, and implementation.

REGIONAL AND LOCAL

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a council of governments representing Riverside, Orange, Los Angeles, Orange, San Bernardino, and Imperial counties. SCAG is the federally recognized Metropolitan Planning Organization (MPO) for this region. SCAG is a regional planning agency and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and state law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their impacts on regional planning programs. As the Southern California region's MPO, SCAG cooperates with the South Coast Air Quality Management District (SCAQMD), California Department of Transportation (Caltrans), and other agencies in preparing regional planning documents.

Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies

SCAG's Connect SoCal 2020-2045 Regional Comprehensive Plan/Sustainable Communities Strategies (RTP/SCS) provides the long-range vision of the SCAG region. Connect SoCal expands land use and transportation strategies established from previous cycles to increase mobility options and achieve a more sustainable growth pattern. It contains plans and projections for the region's future, from 2020 through the horizon year of 2045. Like other RTP/SCS publications, Connect SoCal provides a policy framework for preparing local plans and handling issues of regional significance, such as land use and housing, open space and biological habitats, water, energy, air quality, solid waste, transportation, security and emergency preparedness, economy, and education. Specifically, Connect SoCal also strives to achieve broader regional objectives, such as the preservation of natural lands, improvement of public health,

increased roadway safety, support for the region's vital goods movement industries and more efficient use of resources.

The RTP/SCS advances regional planning by incorporating an integrated approach between SCAG, state and local governments, transportation commissions, resources agencies and conservation groups, the private sector, and the general public.

City of Downey Vision 2025 General Plan

The City of Downey Vision 2025 General Plan (DGP) is a legal document, in the form of a map and accompanying text adopted by the City Council. It serves as a guide to the long-term physical development and growth of the community. In addition, the DGP prepares long-range programs to address further changes in the City. The City's first general plan was adopted in 1963. Downey Vision 2025 is the fourth general plan that was adopted in January 25, 2005. As mandated by state law, cities must update their general plans to ensure all land use decisions are to be consistent with the current zoning regulations and to reflect the needs of the community. The City of Downey General Plan Vision 2025 outlines goals and policies that are applicable to the proposed Project as follows:

Land Use Element

- **Goal 1.1:** Provide sufficient land areas for uses that serve the needs of residents, visitors, and businesses.
    - **Policy 1.1.1:** Maintain a balance of land uses.
    - **Policy 1.1.3:** Provide an appropriate amount of land area for business and employment.
- **Goal 1.2:** Advance livable community concepts.
    - **Policy 1.2.1:** Promote livable communities concepts that allow added flexibility in addressing land use needs.
- **Goal 1.3**: Address changes in land use and zoning trends.
    - **Policy 1.3.1:** Minimize or eliminate conflicts where incompatible land uses are in proximity to each other.
    - **Policy 1.3.2:** Monitor and address changes in land use trends.
- **Goal 1.4:** Protect and enhance the residential neighborhoods.
    - **Policy 1.4.1:** Promote neighborhood identity.
    - **Policy 1.4.2:** Promote residential construction that complements existing neighborhoods.
    - **Policy 1.4.3:** Promote homeownership.

Circulation Element

- **Goal 2.2:** Promote the use of alternative modes of travel, other than single-occupant vehicles, to relieve traffic congestion.
    - **Policy 2.2.1:** Promote walking as an attractive alternative to vehicular transportation.
    - **Policy 2.2.2:** Promote bicycling as an attractive alternative to vehicular transportation.

- **Policy 2.2.3:** Promote public transit as an attractive alternative to vehicular transportation.

Housing Element

- **Goal 2:** Encourage a variety of housing types to meet the existing and future needs of City residents.
  - **Policy 2.1:** Provide adequate sites and zoning to encourage and facilitate a range of housing to address the regional fair share allocation.
  - **Policy 2.2:** Encourage infill development and recycling of land to provide adequate residential sites.

4.9.4 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G contains the Initial Study Checklist, which includes questions concerning. The questions presented in the Initial Study Checklist have been used as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

- Physically divide an established community, or
- 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.

METHODOLOGY AND ASSUMPTIONS

The analysis of land use and planning consists of a summary of the regulatory framework that guides the decision-making process, a description of the existing conditions in the Focus Area, thresholds for determining if the proposed Project would result in significant impacts, anticipated impacts (direct, indirect, and cumulative), mitigation measures, and level of significance after mitigation.

4.9.5 IMPACTS AND MITIGATION

Impact 4.9-1: Would the project physically divide an established community?

No Impact. Projects that divide an established community can involve large scale linear infrastructure, such as freeways, highways, and drainage facilities, that bisect an established community or create barriers to movement within that community. "Locally undesirable land uses" such as prisons or landfills sited within economically depressed areas can also divide an established community.

The Focus Area includes underutilized and deteriorated buildings that are mostly vacant. Currently, the central portion of the Focus Area is not accessible by surrounding communities due to chain-link fencing throughout the site. The Project does not propose direct development that could divide a community, but would facilitate and provide a policy framework for future residential and non-residential development in the Focus Area. Future development facilitated by the proposed Project would be within the identified Focus Area boundaries and would include a maximum of 700 dwelling units (DUs) and 1,130,000 square feet (SF) of non-residential development. Existing institutional uses, including Los Angeles County facilities, are located in the southwestern portion of the Focus Area and would remain upon Project implementation.

The RLASCSP provides a framework for development in the South Campus that complements medical facilities in the North Campus, and allows for Los Angeles County regional facilities. The RLASCSP also lays out how to best develop transit-supportive uses around the proposed Metro West Santa Ana Branch (WSAB) Gardendale Transit Station, located in the southwestern corner of the Focus Area. Additional complementary uses, such as neighborhood commercial and open space nodes and linkages were considered.

In accordance with the DGP, the proposed Project promotes economic development with a focus on diverse job-generating mixed uses. The plan prioritizes the creation of livable communities by providing increased access to regional transit and promoting alternative transit opportunities within an underutilized, deteriorating, area of the City.

All construction, demolition and remediation activities associated with future development would be situated entirely within the Focus Area and would not divide existing surrounding communities. The construction and demolition associated with any offsite improvements (i.e., utility connections within Gardendale Street) would be temporary and within existing rights-of-way, and would therefore not divide the surrounding communities. Upon buildout, the Focus Area would be more open to the public and would and allow for employees and visitors to travel through, which is presently not available. The mixed-use character of the site would encourage stronger connections with local neighborhoods and connectivity with mobility options. As such, operation of future development would not physically divide an established community.

Further, future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements. Future development would be required to adhere to all state and local land use standards, including development standards and design guidelines provided in the RLASCSP. Project implementation would facilitate development on underutilized parcels in the City, resulting in a beneficial impact to surrounding communities. Following compliance with the established regulatory framework, no impact would occur concerning division of an established community.

Mitigation Measures

No mitigation is required.

Impact 4.9-2:	**Would the project cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

Less than Significant. The DGP provides goals and policies that assist the City to plan for and manage growth in a long-term context. The goals and policies provided in the DGP serve as a guide to the physical development of the community. While the proposed Project would not result in direct construction on-site, it would facilitate and provide a policy framework for future development within the Focus Area. RLASCSP Chapter 3: Specific Plan Policy Context outlines guiding principles and policy statements to support the vision of the community as gathered through the community outreach activities and intent of the RLASCSP. **Table 4.9-2: General Plan Consistency Analysis** summarizes RLASCSP principles and policies, development assumptions, and the RLASCSP's consistency with the DGP.

Table 4.9-2: General Plan Consistency Analysis	
General Plan Objective	**Project Consistency**
Land Use Element	
Goal 1.1: Provide sufficient land areas for uses that serve the needs of residents, visitors, and businesses.	**Consistent.** The proposed Project would facilitate development of regional and community serving uses. The Focus Area contains land zoned as Transit-Oriented Development (TOD), Regional Public Facilities (RPF), and Community Serving (CS). The TOD sub-district facilitates residential and neighborhood-supportive uses, in addition to professional offices. The RPF sub-district allows for public uses including County offices and facilities. The CS sub-district provides for community open space and recreational uses. Accordingly, Project implementation would promote balanced and diverse uses to serve residents, visitors, and businesses.
Policy 1.1.1: Maintain a balance of land uses.	**Consistent.** As discussed above, the proposed Project would facilitate development of a mix of uses within the Focus Area. Further, RLASCSP Policy LU-1 outlines the RLASCSP's goal to "Establish land use districts that provide for a complementary mix of land uses, while preserving established residential neighborhoods and historic resources." Future development facilitated by the proposed Project would be required to demonstrate consistency with RLASCSP policies. Accordingly, Project implementation would maintain a balance of land uses.
Policy 1.1.3: Provide an appropriate amount of land area for business and employment.	**Consistent.** The RLASCSP would facilitate development of up to 1,130,000 SF of non-residential development. The Focus Area contains land zoned as Transit-Oriented Development (TOD). The TOD sub-district facilitates transit-supportive uses including neighborhood-serving commercial uses and intends to grow the area, "…into a desirable place for professionals who will have the ability to access a large portion of the region for job opportunities." Accordingly, Project implementation would provide opportunities for business and employment in the City.
Policy 1.2.1: Promote livable communities concepts that allow added flexibility in addressing land use needs.	**Consistent.** The RLASCSP sub-districts and associated development standards allow for diverse mixed-uses and facilitate development of a range of residential and non-residential land uses. Future development facilitated by the proposed Project would be required to adhere to RLASCSP goals and policies which balance use types and serve community needs. Accordingly, Project implementation would promote livable communities and allow flexibility to address land use needs.
Goal 1.3: Address changes in land use and zoning trends.	**Consistent.** The Project promotes economic development with a focus on a diverse mixture of job-generating land uses. The RLASCSP prioritizes creating more livable communities with access to regional transit and alternative transit opportunities. The mixed-use, transit-oriented nature of development is consistent with development trends advised by regional planning agencies, including SCAG. Accordingly, Project implementation would address changes in land use and zoning trends.
Policy 1.3.1: Minimize or eliminate conflicts where incompatible land uses are in proximity to each other.	**Consistent.** The Focus Area is proximate to existing single-family and multi-family neighborhoods. Access from these neighborhoods to new development would enhance the ability of residents to patronize future uses. Future uses would be compatible with and complement these existing residential neighborhoods and minimize potential negative impacts. Accordingly, Project implementation would facilitate development with the potential to minimize and/or eliminate land use incompatibilities.

Table 4.9-2: General Plan Consistency Analysis	
General Plan Objective	**Project Consistency**
Policy 1.3.2: Monitor and address changes in land use trends	**Consistent.** See discussion under Goal 1.3 above.
Goal 1.4: Protect and enhance the residential neighborhoods	**Consistent.** See discussion under Policy 1.1.1 and Policy 1.3.1 above.
Policy 1.4.1: Promote neighborhood identity	**Consistent.** The RLASCSP Urban Design (UD) Policies UD-1 through UD-4 and design guidelines that are intended to guide development that is high quality, cohesive, and representative of the future vision for the RLASC. The Design Guidelines are intended to establish a high standard for design and future development, while preserving the existing historic character of the area. Future development facilitated by the proposed Project would be required to demonstrate consistency with urban design policies and guidelines. Accordingly, Project implementation would promote neighborhood identity.
Policy 1.4.2: Promote residential construction that complements existing neighborhoods	**Consistent.** A primary goal of the RLASCSP is to create stronger connections with local neighborhoods and improve mobility and access with surrounding uses. As discussed under Policy 1.3.1, future development facilitated by the proposed Project would be required to demonstrate compatibility with existing neighborhoods.
Circulation Element	
Goal 2.2: Promote the use of alternative modes of travel, other than single-occupant vehicles, to relieve traffic congestion.	**Consistent.** The RLASCSP prioritizes the creation of more livable communities with access to both regional transit and promotes alternative transit opportunities. RLASCSP Guiding Principle #8 states, "Explore multi-modal connections to other parts of the City through the proposed Active Transportation Plan (ATP), which combines bicycle with pedestrian circulation infrastructure on a citywide basis to provide an ultimate citywide blueprint for future active transportation opportunities as an alternative travel mode." Future development facilitated by the proposed Project would be required to demonstrate consistency with RLASCSP guiding principles. Accordingly, Project implementation would promote alternative modes of travel.
Policy 2.2.1: Promote walking as an attractive alternative to vehicular transportation.	**Consistent.** RLASCSP Mobility (MO) Policy MO-2 states, "Create and enhance bicycle and pedestrian connections between key community amenities and activity centers" and Policy MO-3 states, "Improve and enhance non-vehicular and vehicular circulation and connections that are pedestrian-friendly in conjunction with future development. Large, expansive parking lots will be discouraged or prohibited to further encourage transit supportive development." Future development would be required to demonstrate consistency with these policies. Accordingly, future development facilitated by the proposed Project would promote walking as an alternative to vehicular transportation.
Policy 2.2.2: Promote bicycling as an attractive alternative to vehicular transportation.	**Consistent.** RLASCSP Guiding Principle #8 states, "Explore multi-modal connections…which combines bicycle with pedestrian circulation infrastructure on a citywide basis to provide an ultimate citywide blueprint for future active transportation opportunities as an alternative travel mode." Further, Policy MO-2 requires enhanced bicycle connectivity and Policy MO-5, "Require(s) bicycle parking at key location, such as employment centers, parks, transit, schools, and commercial centers."

Table 4.9-2: General Plan Consistency Analysis	
General Plan Objective	**Project Consistency**
	Accordingly, future development facilitated by the proposed Project would promote bicycling as an alternative to vehicular transportation.
Policy 2.2.3: Promote public transit as an attractive alternative to vehicular transportation.	**Consistent.** The RLASCSP aims to establish land use regulations that support increased pedestrian and bicycle activity and transit usage. RLASCSP Policy MO-4 states, "Support improvements to public transportation infrastructure, including bus transit and potential rail facilities." Future development facilitated by the proposed Project would be required to demonstrate consistency with RLASCSP goals and policies. Accordingly, Project implementation would promote public transit as an alternative to vehicular transportation.
Housing Element	
Goal 2: Encourage a variety of housing types to meet the existing and future needs of City residents	**Consistent.** The RLASCSP allocates land for residential uses within the TOD sub-district. Project implementation would facilitate development of up to 700 DU proximate to community-serving uses, multi-modal transportation opportunities, and job opportunities. Project implementation would allow for a range of transit-oriented housing types and future residential development projects would be required to demonstrate consistency with RLASCSP goals and policies pertaining to housing. Accordingly, Project implementation would encourage a variety of housing types to meet the needs of City residents.
Policy 2.1: Provide adequate sites and zoning to encourage and facilitate a range of housing to address the regional fair share allocation.	**Consistent.** The Focus Area is designated Commercial Manufacturing by the DGP and zoned Single-Family Residential (R-1 5,000), Rancho Business Center Specific Plan (SP 88-1), and Rancho Los Amigos Specific Plan (SP 85-1). The proposed Project would change the land use DGP and zoning designations to RLASCSP, which would allow for residential development in the Focus Area. Project implementation would facilitate future development of residential uses within the Focus Area through the creation of a TOD sub-district which allows for residential uses. Project implementation would facilitate development of 700 DUs and create additional opportunities sites to make progress on RHNA allocations. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including state, regional, and local housing policies. Accordingly, Project implementation would increase residential development sites and encourage a range of housing.
Policy 2.2: Encourage infill development and recycling of land to provide adequate residential sites.	**Consistent.** The RLASCSP was prepared to promote future development of the southern portion of the Rancho Los Amigos Campus, which has sat mostly vacant since the consolidation of the Rancho Los Amigos National Rehabilitation Center in the 1980s. The Specific Plan area, inclusive of the Focus Area includes many vacant structures in varying stages of disrepair. Project implementation would facilitate redevelopment of the site and promote mixed-use development on underutilized land proximate to transit opportunities in the City. Future development facilitated by the proposed Project would include residential uses and would be located on previously developed land. Project implementation would encourage infill development and recycling of land to provide residential sites.

As shown in **Table 4.9-2**, the RLASCSP would be consistent with the goals and policies outlined in the DGP. The RLASCSP policies serve as the benchmark for the analysis of future project proposals and design concepts to determine if they are supportive of the goals and intent of the Specific Plan, and by extension, the DGP. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements. Following compliance with the established regulatory framework, a less than significant impact would occur and no mitigation is required.

Mitigation Measures

No mitigation is required.

4.9.6 CUMULATIVE IMPACTS

When evaluating cumulative land use and planning impacts, several factors must be considered. The cumulative study area for land use impacts is the City. The combination of the proposed Project together with related present and reasonably foreseeable future projects, as provided in **Table 3-1: Cumulative Projects List**, could involve actions with the potential to result in adverse land use impacts. As previously stated, the Project does not propose development but would facilitate future development with a potential buildout of 700 DUs and 1,130,000 SF of non-residential land uses within the Focus Area.

Potential impacts of future development within the Focus Area would require project-level evaluation prior to approval of permits when future development is proposed. Each development in the Focus Area would be required to comply with policies and regulations set out by the proposed Specific Plan's goals and policies and land use and development standards, in addition to the City's General Plan. Compliance with these policies, plans, and regulations would ensure that proposed future development would be compatible. Where significant or potentially significant impacts are identified, implementation of all feasible mitigation will be required to reduce or preclude significant land use impacts. Therefore, the Project's contribution toward cumulative impacts is not otherwise considered to be cumulatively considerable.

4.9.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable land use impacts have been identified.

4.9.8 REFERENCES

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4.10 NOISE

4.10.1 INTRODUCTION

This section analyzes potential noise and vibration impacts that would result from the Rancho Los Amigos South Campus Specific Plan (RLASCSP) Project (Project or proposed Project). The analysis describes the existing noise environment, estimates future noise and vibration levels at surrounding land uses resulting from construction and operation of the Project, and identifies the potential for significant impacts based on established thresholds. An evaluation of the Project's contribution to potential cumulative noise impacts is also provided.

No site-specific surveys or technical studies were conducted for this analysis. The RLASCSP Focus Area was evaluated in this PEIR at a programmatic level based on information available to the City of Downey (City) where reasonably foreseeable, direct, and indirect physical changes in the environment could be considered. Further analysis was not conducted because no specific development projects are proposed at this time and it would be speculative to base an analysis of potential impacts resulting from future development per the RLASCSP without such information.

This PEIR section relies upon and incorporates by reference in its entirety the County of Los Angeles Rancho Los Amigos South Campus Project Final EIR (County Project EIR) Section 3.10, Noise (June 2020). The analysis conducted for the County Project EIR is representative of general site conditions and sensitivity throughout the South Campus. That EIR and the detailed studies therein adequately address the noise environment, and applicable mitigation strategies.

4.10.2 AFFECTED ENVIRONMENT

NOISE CONCEPTS

Noise is generally defined as loud, unexpected, or unwanted sound typically associated with human activity. Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, or when it has adverse effects on health. The definition of noise as unwanted sound implies that it has an adverse effect on people and their environment. Sound is composed of various frequencies; however, the human ear does not respond to all frequencies, being less sensitive to very low and high frequencies than to medium frequencies that correspond with human speech.

There are three conceptual components to noise: a noise source, a receptor, and the propagation path between the two. The loudness of the noise source, obstructions, or atmospheric factors affecting the propagation path, determine the perceived sound level and noise characteristics at the receptor. Noise sources can be classified in two forms: point sources, such as individual pieces of stationary or mobile equipment (pumps, heavy construction equipment), and line sources, such as a roadway with a large number of pass-by sources (motor vehicles).

Measuring sound directly in terms of pressure would require a large range of numbers. To avoid this, the decibel (dB) scale was devised. The dB scale uses the hearing threshold of 20 micropascals (µPa) as a point of reference, defined as 0 dB. Other sound pressures are then compared to this reference pressure, and the logarithm is taken to keep the numbers in a practical range. The dB scale allows a million-fold increase in pressure to be expressed as 120 dB, and changes in levels correspond closely to human perception of relative loudness.

The dB scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Several rating scales have been developed to analyze the adverse effect of community noise on people. Because environmental noise fluctuates over time, these scales consider that the noise's effect on people is largely dependent on the noise's total acoustical energy content, as well as the time when the noise occurs. The equivalent noise level (L_{eq}) represents the equivalent continuous sound pressure level over the measurement period, while the day-night noise level (L_{dn}) and Community Equivalent Noise Level (CNEL) are measures of energy average during a 24-hour period, with dB weighted sound levels from 7:00 PM to 7:00 AM Most commonly, environmental sounds are described in terms of an average level (L_{eq}) that has the same acoustical energy as the summation of all the time-varying events.

Sound-level meters adjust for the weight the human ear gives to certain frequencies, applying a correction to each frequency range to approximate the human ear's sensitivity within each range. This is called "A-weighting" and is commonly used in measurements of community environmental noise. The A-weighted sound level (dBA) is determined to be the most appropriate unit of measure for community noise. The following noise descriptors are used in this evaluation:

- dB: The decibel (dB) scale is used to quantify sound intensity, with 0 dB corresponding roughly to the threshold of human hearing, and 120 to 140 dB corresponding to the threshold of pain.
- dBA: A-weighted decibels (dBA) are measured using a filter that de-emphasizes the frequencies below 1,000 hertz (Hz) and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to low and extremely high frequencies.
- L_{eq}: The energy-equivalent sound level (Leq) provides a single numerical value for noise measured over a specified period of time. The Leq is the noise exposure level for the given time period.
- L_{max}: The instantaneous maximum noise level (Lmax) measured during the measurement period.
- DNL: The day-night average sound level (DNL) is the average of the A-weighted sound levels occurring during a 24-hour period and accounts for the greater sensitivity of most people to noise at night. DNL "penalizes" noise occurring between 10:00 PM and 7:00 AM by adding 10 dBA to nighttime noise levels.
- CNEL: Similar to DNL, the community noise equivalent level (CNEL) treats each evening noise event as though it were three, which adds a 4.77-dB "penalty" for noise events occurring between 7:00 PM and 10:00 PM. Nighttime events are multiplied by ten, which adds a 10-dB penalty to noise events occurring between 10:00 PM and 7:00 AM.

NOISE AND VIBRATION-SENSITIVE RECEPTOR LOCATIONS

Some land uses are considered more sensitive to noise than others, due to the types of activities of the land use requiring quiet. Noise-sensitive zones are those areas having residential or semi-residential/commercial land uses, provided that conspicuous signs are displayed near the institution or facility. Existing noise-sensitive uses within 500 feet, which is the distance at which noise would not be discernable originating from the Focus Area, generally include the following:

- Single-family residences located approximately 10 feet from the Focus Area along the southeast border of the Focus Area, adjacent to the existing surface parking lot located east of Dahlia Avenue.

- The St. Pius X -St. Matthias Academy is immediately adjacent, south of the Focus Area at the corner of Gardendale Street and Paramount Boulevard.
- Single-family residences located 55 feet south of the Focus Area across Gardendale Street.
- Single-family residences located 50 feet southwest of the Focus Area across Utah Avenue.
- Single-family residences are located 440 feet north of the Focus Area across Flores Avenue.
- The Rancho Los Amigos KinderCare daycare facility located 840 feet north of the Focus Area at 7755 Golondrinas Street, across Golondrinas Street.

Ambient Noise Levels

Given that many of the buildings in the Focus Area are vacant, the primary noise sources are from the existing industrial, institutional, and manufacturing uses as well as the surrounding urban areas. The predominant existing noise source is vehicle traffic noise from Gardendale Street, Garfield Avenue, and Erickson Avenue as well as train noise from the rail corridor. Secondary noise sources include general residential- and commercial-related activities, such as landscaping and refuse service activities.

Vibration Concepts

Vibration tolerance typically depends on the structure types affected. Structural response to vibration is typically evaluated in terms of peak particle velocity (PPV). PPV is often used since it is related to the stresses experienced by the buildings. Various general standards are contained in the International Standards Organization's standards 3945, 4866, and 7626-1. Limits set by these standards indicate a low probability of structural damage occurring to common structures at a PPV of 2 inches per second (IPS). Older residential structures have a limit of 0.3 IPS to 0.5 IPS.[1] The Federal Transit Administration (FTA) identifies a vibration damage threshold criterion of 0.20 IPS for non-engineered timber and masonry buildings (i.e., fragile buildings) and 0.12 IPS for buildings extremely susceptible to vibration (i.e., fragile historic buildings).[2]

The FTA has identified the following three categories of vibration-sensitive uses:

- Category 1 – High Sensitivity Uses: Buildings where ambient vibration well below levels associated with human annoyance is essential for equipment or operations within the building. Typically uses covered in Category 1 include vibration-sensitive research and manufacturing facilities, hospitals, and university research operations.
- Category 2 – Residential Uses: Buildings where people sleep. Typical uses covered in Category 2 include residential, hotels, and hospitals.
- Category 3 – Institutional Uses: Buildings that do not have vibration-sensitive equipment, but still have the potential for activity interference. Typical uses covered in Category 3 include schools, churches, other institutions, and quiet offices.

[1] Caltrans, *Transportation and Construction Vibration Guidance Manual*, 2013.
[2] Federal Transit Administration (FTA), *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

4.10.3 REGULATORY SETTING

STATE

California Code of Regulations, §65302(f)

California Code of Regulations, §65302(f), requires local land use planning jurisdictions to prepare a general plan. The noise element is a mandatory component of the general plan. It may include general community noise guidelines developed by the California Department of Health Services and specific planning guidelines for noise/land use compatibility developed by the local jurisdiction. The state guidelines also recommend that the local jurisdiction consider adopting a local noise control ordinance.

The California Department of Health Services developed guidelines for community noise acceptability for use by local agencies. Selected relevant levels are as follows (Ldn may be considered nearly equal to CNEL):

- CNEL below 60 dBA – normally acceptable for low-density residential use
- CNEL of 55 dBA to 70 dBA – conditionally acceptable for low-density residential use
- CNEL below 65 dBA – normally acceptable for high-density residential use
- CNEL of 60 to 70 dBA – conditionally acceptable for high-density residential use, transient lodging, churches, and educational and medical facilities
- CNEL below 70 dBA – normally acceptable for playgrounds and neighborhood parks

"Normally acceptable" is defined as satisfactory for the specified land use, assuming that normal conventional construction is used in buildings. "Conditionally acceptable" may require some additional noise attenuation or special study. Under most of these land use categories, overlapping ranges of acceptability and conditionally acceptable are presented, leaving some ambiguity in areas where noise levels fall within the overlapping range.

LOCAL

City of Downey Vision 2025 General Plan: Noise Chapter

The Noise Chapter of the General Plan (DGP) is a program for establishing and maintaining various land uses in relationship to the levels of noise found in the City. The Chapter identifies goals, policies, and programs to address noise issues. The following policies and programs in the Noise Chapter are applicable to the proposed Project.

- **Policy 6.1.1:** The City shall require noise reduction measures in all new construction where necessary.
- **Program 6.1.1.2:** Require the preparation and submittal of acoustical reports by a recognized acoustical engineer for noise-sensitive land use developments that will be located in areas with an exterior noise level greater than 60 dBA CNEL. These reports shall identify appropriate noise mitigation measures to address the noise impacts.

Land use compatibility guidelines of the Noise Chapter are similar to the California Department of Health Guidelines. According to the Noise Chapter, noise-sensitive uses are "normally acceptable" in a noise environment under 60 dBA CNEL. Over 60 dBA CNEL, noise-sensitive uses would be acceptable with appropriate mitigation or insulation features. Office and commercial uses would be "normally acceptable"

in a noise environment up to 70 dBA CNEL, and office and commercial uses with modern architectural features (such as closed windows and mechanical system for full-time ventilation), such as the proposed uses, would be acceptable in noise environment up to 75 dBA CNEL. Industrial uses would be "normally acceptable" in a noise environment up to 75 dBA CNEL, or 80 dBA CNEL with appropriate insulation features.

City of Downey Municipal Code §4606

The City has adopted noise standards as part of the Downey Municipal Code (DMC Chapter 6, Unnecessary Noise). Construction noise is limited by the ordinance to between the hours of 7:00 AM to 9:00 PM and is generally limited to 85 dBA at the property line of a sensitive receptor and is not subject to the operational limits discussed below.

Standards of the ordinance for operational activities include maximum permissible noise levels for noise sources not operating in a public right-of-way (DMC §4606.3). These noise standards generally apply to sources of noise other than preempted activities, bell chimes or carillons used in conjunction with religious services, emergency energy release devices, emergency work, special events, unamplified human voice, warning systems, roadway traffic noise, and construction noise.

4.10.4 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G contains the Initial Study Checklist, which includes questions concerning noise. The questions presented in the Initial Study Checklist have been utilized as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

- Generate 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.
- Generate excessive groundborne vibration or groundborne noise levels.
- Be located within near 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, so that the project would expose people residing or working in the project area to excessive noise levels.

The thresholds presented above are qualitative and do not provide specific guidance regarding impact determination. No site-specific surveys or technical studies were conducted for this analysis. Future buildout of the Focus Area is evaluated based on information contained in this PEIR at a programmatic level, as discussed above.

METHODOLOGY AND ASSUMPTIONS

This analysis considers the State CEQA Guidelines, Appendix G thresholds, as described above, in determining whether the RLASCSP, including future development facilitated by the RLASCSP in the Focus Area, would result in a substantial temporary or permanent increase in noise or vibration, or if the RLASCSP area is within the vicinity of a private airport or airport land use plan. The evaluation was based on a review of regulations and determining their applicability to the RLASCSP.

4.10.5 IMPACTS AND MITIGATION MEASURES

Impact 4.10-1: Would the project generate a substantial temporary 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 during on-site construction activities or during project operations?

Less than Significant with Mitigation.

CONSTRUCTION NOISE

Future development facilitated by the RLASCSP would result in construction noise generated from development activities. In general, construction would typically involve the following construction sequences: (1) site preparation and/or demolition; (2) grading and utilities construction; (3) building construction; (4) paving; and (5) architectural coatings. Typical construction equipment would include backhoes, excavators, graders, loaders, compactors, cranes, trucks, pavers, pneumatic tools, generator sets, and air compressors. With exception to pile-driving activities, construction equipment with substantially higher noise-generation characteristics (such as rock drills and blasting equipment) would not be anticipated for construction of typical residential developments.

As shown in **Table 4.10-1: Construction Equipment Noise Emission Levels**, typical construction equipment generates maximum noise levels at 50 feet from the noise source ranging between 80 dBA for backhoes and loading trucks, to 85-90 dBA for graders and excavators. As shown in the table, construction noise levels would exceed the Project's significance threshold of 60 dBA at all sensitive receptor locations, except for the residential land uses northwest of the Focus Area, without mitigation.

Operating cycles for these types of construction equipment used may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). In general, construction noise can vary substantially from day to day, depending on the level of activity and the specific type of equipment in operation. Additionally, construction activities associated with future development facilitated by the RLASCSP is anticipated to occur in incremental phases over time based on market demand, economic, and planning considerations. As a result, construction-related noise would not be concentrated in any one particular area over the entire buildout of the Focus Area.

Table 4.10-1: Construction Equipment Noise Emission Levels

Type of Equipment	Acoustical Use Factor	Lmax at 50 feet (dBA)
Crane	16	81
Dozer	40	82
Excavator	40	81
Generator	50	81
Grader	40	81
Other Equipment (greater than five horsepower)	50	85
Paver	50	77
Pile Driver (impact)	20	101

Table 4.10-1: Construction Equipment Noise Emission Levels		
Type of Equipment	**Acoustical Use Factor**	**Lmax at 50 feet (dBA)**
Pile Driver (sonic)	20	96
Roller	20	80
Tractor	40	84
Truck	40	80
Welder	40	73
Source: Federal Highway Administration, Roadway Construction Noise Model (FHWA-HEP-05-054), 2006.		

All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including DMC §4606 (Noise Ordinance). According to DMC §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 PM of one day and 7:00 AM 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. Exemptions to the code requirements include noise related to emergency work or government preempted activities.

For some future developments, such as those near sensitive receptors, conditions of approvals could include measures under its development review process such as temporary sound barriers and shielding to reduce potential noise impacts on sensitive receptors. For example, acoustically designed enclosures and buildings can provide up to approximately 50 dBA of noise reduction, depending on the noise abatement treatments implemented.

OPERATIONS NOISE

Future development facilitated by the RLASCSP would result in additional housing, people, pets, and automobiles in the community. Noise is also likely to occur from stationary operation-related sources, such as heating, ventilation, and air conditioning (HVAC) units, tankless water heaters, generators, lawn maintenance equipment, and swimming pool pumps. As noted, all future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including compliance with DMC §4606 (Noise Ordinance).

Some stationary noise sources, such as mechanical HVAC units located on the ground or on rooftops of the future structures, would have the potential to generate high noise levels. However, specific information on the HVAC units (locations, sizes, manufactures, models) associated with future residential and commercial development facilitated by the RLASCSP is not known. Noise levels generated by HVAC units vary, but typically range from approximately 50 to 65 dBA at a distance of 50 feet. Noise emitted from a single point source, such as an HVAC unit, decreases by about 6 dBA for each doubling of distance. Depending on a particular development site, stationary equipment such as generators and HVAC systems with exterior fans or condensers mounted on the ground or roofs could emit noise levels that exceed the City stationary noise source standard for residential uses of 55 dBA Leq during daytime hours and 45 dBA L_{eq} for nighttime hours. While the ultimate locations and specific model types of stationary equipment are

not known, all future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including the Noise Ordinance. Compliance is typically achieved through the inclusion of acoustical enclosures around the HVAC units.

Noise is also likely to occur from line sources, such as motor vehicle traffic. Future development facilitated by the RLASCSP would result in increased traffic volumes on local city roadways, thereby increasing cumulative noise levels. Given the City's largely developed nature, implementation of a new development would not be expected to significantly increase traffic volume on local roadways. Additional average daily trips (ADT) from future development facilitated by the RLASCSP would need to more than double current ADT for there to be a discernable difference in noise levels (i.e., more than 3 dBA increase). According to the DGP Circulation Element, Gardendale Street and Imperial Highway had an ADT of 10,900 and 35,300 respectively. This traffic volume would have to double for there to be a discernable noise difference. RLASCSP buildout would occur over several years by 2035. It is unlikely that individual future development projects would double the ADT on the adjacent roadways. The Focus Area includes a proposed TOD sub-district and adjacent to the future Metro West Santa Ana Branch (WSAB)/Metro Project, which is expected to reduce dependency on vehicular trips and reduce average trip generations within the RLASCSP area. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements. This may include project-specific CEQA evaluation and preparation of technical analyses, including noise and traffic studies. Therefore, it is not anticipated that there would be a discernable noise difference that would be noticed by current or future residents.

Further, implementation of **Mitigation Measures (MM) NOI-1** and **MM NOI-2** would ensure no significant impact would occur to adjacent noise-sensitive receptors. Compliance with **MM NOI-1** would minimize construction noise associated with future development through the use of site-specific noise reduction features. Specifically, **MM NOI-1** requires the use of the best available noise control techniques, as well as alternatives to pneumatic power tools. **MM NOI-2** requires compliance with a list of measures to respond to and track complaints related to construction noise. With implementation of **MM NOI-1** and **MM NO-2**, as well as compliance with the Noise Ordinance and development review conditions, noise impacts from construction and operations of future development facilitated by the RLASCSP would be reduced to a level that is less than significant.

Mitigation Measures

MM NOI-1 To reduce construction-related noise impacts, where construction activities would exceed the standards established in DMC §4606.5 (Construction Noise), the Applicant shall require construction contractors to implement a site-specific Noise Reduction Program, which includes the following measures, ongoing through demolition, grading, and/or construction:

- Equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically-attenuating shields or shrouds), wherever feasible.

- Impact tools (e.g., jackhammers, pavement breakers, and rock drills) used for construction shall be hydraulically or electronically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler shall be used (this muffler can lower noise levels from the exhaust by up to approximately 10 dBA). External jackets on the tools themselves shall be used where feasible (this can achieve an approximately 5.0-dBA reduction. Quieter procedures shall be used, such as drills rather than impact equipment, whenever feasible.
- Stationary construction-related noise sources shall be located as far from adjacent receptors as possible, and they shall be muffled and incorporate insulation barriers, or other measures to the extent feasible.

MM NOI-2 Prior to demolition, grading, or building permit approval, the Applicant shall submit to the Planning Division and Community Development Department a list of measures to respond to and track complaints pertaining to construction noise, ongoing throughout demolition, grading, and/or construction. At minimum, these measures shall include the following:

- A procedure to the public for notifying the City's Code Compliance Officer and Police Department (during regular construction hours and off-hours);
- A requirement for a sign to be posted by the Applicant on-site specifying the permitted construction days and hours, and notification procedure, and who to notify in the event of a noise-related concern. The sign shall also include the construction contractor's telephone numbers (during regular construction hours and off-hours); and
- A requirement for a preconstruction meeting to be held with the Applicant and general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed.

Impact 4.10-2: Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant with Mitigation. Construction activities on the Focus Area have the potential to generate low levels of groundborne vibration from the operation of heavy equipment (i.e., dozer, excavator, grader, loader, scraper, and paver, etc.) that propagate through the ground and diminish in intensity with distance from the source. No high-impact activities, such as pile driving or blasting, would be used during Project construction. Single-family residential uses to the east of the existing northeastern surface parking lot by Dahlia Street are the nearest off-site buildings to the Focus Area (approximately 15 feet) that could be exposed to vibration levels generated from Project construction. Groundborne vibrations from construction activities very rarely reach the levels that can damage structures, but they may be perceived in buildings very close to a construction site.

The FTA has published standard vibration velocities for construction equipment operations. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 inch/second PPV) appears to be

conservative even for sustained pile driving. Pile driving levels often exceed 0.2 inch/second PPV at distances of 50 feet, and 0.5 inch/second PPV at 25 feet without any apparent damage to buildings.

Additionally, the Caltrans' *Transportation and Construction Vibration Guidance Manual* (April 2020) provides a vibration damage potential threshold criteria for continuous sources of vibration of 0.12 inch/second PPV for Class IV buildings typically historic and very sensitive to vibration, 0.2 inch/second PPV for Class III buildings typically with wooden ceilings and walls in masonry, 0.3 inch/second PPV for Class II buildings typically built with foundation, floors, and walls in concrete or masonry, and 0.5 inch/second PPV for Class I buildings typically built from reinforced steel or reinforced concrete.

The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 25 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. Construction activities associated with future development have the potential to generate low levels of groundborne vibration. **Table 4.10-2: Typical Vibration Levels for Construction Equipment**, identifies various vibration velocity levels for various construction equipment types.

Table 4.10-2: Typical Vibration Levels for Construction Equipment

Type Of Equipment	Approximate Peak Particle Velocity At 25 Feet	Approximate Peak Particle Velocity At 50 Feet	Approximate Peak Particle Velocity At 85 Feet
Large bulldozer	0.089	0.031	0.014
Loaded trucks	0.076	0.027	0.012
Small bulldozer	0.003	0.001	0.001
Auger/drill rigs	0.089	0.031	0.014
Jackhammer	0.035	0.012	0.006
Pile driver	0.644	0.228	0.010

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.
Notes: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018. Table 7-4. Calculated using the following formula:
PPV equip = PPVref x $(25/D)^{1.5}$
Where: PPV (equip) = the peak particle velocity in in/sec of the equipment adjusted for the distance
PPV (ref) = the reference vibration level in in/sec from FTA Transit Noise and Vibration Impact Assessment Manual, Table 7-4.
D = the distance from the equipment to the receiver

Similar to noise, groundborne vibration would attenuate with distance. The groundborne vibration generated during construction activities would primarily impact vibration-sensitive land uses (i.e., nonengineered timber and masonry buildings) located adjacent to or near the construction activity. The force of vibrations reaching an adjacent structure would depend upon several variables, including the activity generating the vibrations, the distance between the source and the existing structure, and the type of soil or pavement found between the two. Based upon the vibration velocity levels provided in

Table 4.10-2, vibration velocities from typical heavy construction equipment operations that could be used during construction activities range from 0.003 to 0.089 inch/second PPV at 25 feet from the activity source (and up to 0.644 inch/second PPV if pile driving activities were to occur). Thus, vibration velocities from typical heavy construction equipment operations at 25 feet from the activity source would not exceed the 0.2 the inch/second PPV threshold or the 0.12 inch/second PPV threshold for historic/sensitive buildings, except for pile driving activities. Vibration velocities from pile driving activities at 50 feet from the activity source would exceed the 0.2 the inch/second PPV and 0.12 inch/second PPV thresholds. Therefore, construction-related activities that involve pile driving and occur 50 feet from a vibration-sensitive land use (non-engineered timber and masonry buildings) could exceed 0.2 the inch/second PPV threshold, and expose persons or structures to, or generate excessive groundborne vibration or groundborne noise levels. **Table 4.10-2** shows that vibration levels from pile driving would be below the 0.12 inch/second PPV threshold for historic/sensitive buildings at 85 feet.

To lessen potential vibration-related impacts to adjacent sensitive uses, **MM NOI-3** requires that the preexisting condition of all buildings within a 50-foot radius of proposed construction activities that involve pile driving be evaluated during a preconstruction survey and that alternative methods be used. Additionally, **MM NOI-4** prohibits pile driving activities within 85 feet of historic buildings.

Residential uses would not be anticipated to generate excessive groundborne vibration or groundborne noise. Future development facilitated by the RLSCSP would not involve industrial or substantial heavy truck operations, and therefore would not result in vibration impacts at surrounding uses. Therefore, operational activities associated with future development would not expose persons or structures to or generate excessive groundborne vibration or groundborne noise levels. Therefore, impacts would be less than significant, and no additional mitigation is required for operational uses.

Mitigation Measures

MM NOI-3 **Vibratory Equipment for Historic Buildings.** To avoid or minimize potential construction vibration damage to structural or finish materials on on-site historic buildings, the condition of such materials shall be documented by a qualified preservation consultant, prior to initiation of construction. During construction, the contractor shall install and maintain at least two continuously operational automated vibrational monitors on any on-site historic structures within 100 feet of active construction activity. The monitors must be capable of being programmed with two predetermined vibratory velocities levels: a first-level alarm equivalent to a 0.45 inch per second at the face of the building and a regulatory alarm level equivalent to 0.5 inch per second at the face of the building. The monitoring system must produce real-time specific alarms (via text message and/or email to on-site personnel) when velocities exceed either of the predetermined levels. In the event of a first-level alarm, feasible steps to reduce vibratory levels shall be undertaken, including but not limited to halting/staggering concurrent activities and utilizing lower-vibratory techniques. In the event of an exceedance of the regulatory level, work in the vicinity shall be halted and the historic structure visually inspected for damage. Furthermore, once construction has been completed, a qualified preservation consultant shall conduct a final visual inspection of the on-site historic structures to determine if any damage has occurred.

Results of the inspections must be logged and submitted to the City. In the event damage occurs to historic finish materials due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant.

MM NOI-4 **Vibratory Equipment for Residential Receptors.** Use of high impact, heavy-duty equipment shall be limited to the extent feasible within 25 feet of residential receptors. Where feasible, equipment or alternative techniques that would generate vibration velocities not exceeding 0.04 in/sec PPV at 25 feet shall be utilized.

MM NOI-5 **Notify Residences.** Prior to large bulldozers, large loaded trucks, and vibratory compactor/rollers being operated at the Specific Plan area within 50 feet of an occupied residence, the Project Contractor(s) shall notify the affected residential property owners in writing of upcoming construction including the anticipated start and end dates and hours of operation. This restriction does not apply to trucks on a public right-of-way.

Impact 4.10-3: Would the project be 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 and expose people residing or working in the project area to excess noise levels?

No Impact. The RLASCSP area, inclusive of the Focus Area is not located within the vicinity of a private airstrip or an airport land use plan. Therefore, there would be no impact.

Mitigation Measures

No mitigation is required.

4.10.6 CUMULATIVE IMPACTS

Construction Noise. Construction activities within the project planning area as a result of the Specific Plan and cumulative projects may overlap, resulting in construction noise in the area. However, construction noise impacts primarily affect the areas immediately adjacent to the construction site. The combination of the proposed Project together with related present and reasonably foreseeable future projects, as provided in **Table 3-1: Cumulative Projects List**, could involve actions with the potential to result in noise impacts. However, construction noise impacts for each cumulative project would be mitigated through compliance with the City's standards and ordinances, and any necessary mitigation measures identified through the City's development review process. Thus, impacts would not be cumulatively considerable. The proposed Project would result in a less than significant impact regarding construction noise with implementation of **MM NOI-1** and **MM NOI-2**. Therefore, the project's contribution to cumulative noise impacts would be less than significant.

Operational Noise. As discussed above, new uses within the Focus Area as a result of the Specific Plan could generate stationary noise levels exceeding City standards. Cumulative projects in the surrounding area could also create stationary noise source impacts. However, stationary noise sources in the Specific Plan area and cumulative projects would be required to prepare an acoustical analysis and mitigation measures to reduce noise levels to comply with the City's standards. In addition, future development within the Focus Area and cumulative development projects would be required to comply with city, state and federal guidelines regarding noise abatement and insulation standards. This would ensure that noise

levels in the project planning area and surrounding areas are maintained within acceptable standards that prevent excessive disturbance, annoyance, or disruption. Additionally, future development would be subject to the development review process, which could include conditions of approval to minimize the exposure of residents to excessive noise to the furthest extent possible. Therefore, following compliance with federal, state, and local standards, the Project would result in less than significant stationary noise source impacts, and would not have a cumulatively considerable impact.

Future development facilitated by the Project and generated by cumulative projects would result in increased traffic volumes on local roadways, thereby increasing cumulative noise levels. Given the City's and surrounding communities' largely developed nature, implementation of a new development would not be expected to significantly increase traffic volume on local roadways. Additionally, the Project includes a TOD district and adjacent to the future Metro West Santa Ana Branch (WSAB)/Metro Project, which is expected to reduce dependency on vehicular trips and reduce average trip generations. Future development projects would adhere to noise regulations and comply with the development review process, which may require additional project-specific evaluation and preparation of technical studies including noise and traffic studies. Therefore, Project impacts would not be cumulatively considerable, and a less than significant impact would occur.

Vibration. As noted above, construction vibration impacts associated with Project implementation would be reduced to a less than significant level with implementation of **MM NOI-3**. In addition, long-term operational groundborne vibration impacts would be less than significant, as the land uses identified in the Specific Plan would not generate excessive groundborne vibration. Therefore, vibration impacts of the proposed project would not be cumulatively considerable, and a less than significant impact would occur.

4.10.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable noise or vibration impacts have been identified.

4.10.8 REFERENCES

City of Downey. January 2005. *Vision 2025 General Plan*. Available at https://www.downeyca.org/home/showpublisheddocument/154/636977201799600000. Accessed May 15, 2021.

Caltrans, *Transportation and Construction Vibration Guidance Manual*, 2013.

Federal Highway Administration, *Roadway Construction Noise Model (FHWA-HEP-05-054)*, 2006.

Federal Transit Administration (FTA), *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

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4.11 POPULATION AND HOUSING

4.11.1 INTRODUCTION

The purpose of this section is to describe the existing regulatory and environmental conditions related to population and housing. The Rancho Los Amigos South Campus Specific Plan (RLASCSP) area's demographics are examined in the context of existing and projected population, housing, and employment for the City of Downey (City) and the County of Los Angeles (County). This section also identifies potential impacts that could result from future development associated in the RLASCSP, and as necessary, recommends mitigation measures to avoid/reduce the significance of impacts. The population and housing issues addressed in this section are those associated with unplanned population growth and displacement of people and housing.

The affected environment discussion is based largely on the following documentation:

- California Department of Finance. (2021). *Report E-5 Population and Housing Estimates for Cities, and Counties, and the State*
- California Economic Development Department Labor Market Information Division. (2021). *Monthly Labor Data for Cities and Census Designated Places*
- Southern California Association of Governments (SCAG) *Connect SoCal – The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy,* September 2020
- SCAG *Employment Density Study Summary Report*

Other information in this section, such as the regulatory framework, was gathered from various planning documents including the City of Downey General Plan Vision 2025 Housing Element (DGP).

4.11.2 AFFECTED ENVIRONMENT

EXISTING AND PROJECTED POPULATION

Table 4.11-1, Population Estimates (2016–2045) provides County and City population estimates in SCAG's Connect SoCal: Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal) data. Connect SoCal, which addresses population, households, and employment. SCAG's forecasts are based on jurisdictions' existing land uses and General Plan land use designations. Population projections are calculated based on household growth and household size. SCAG forecasts that the County's population will increase by approximately 22 percent and the City's population will increase by approximately 8 percent between 2016 and 2045. According to data provided by SCAG, the City's population in 2016 was 113,300 and is expected to increase to 119,200 by 2045, which equates to an approximate 5 percent increase in population. This averages to an approximate 0.17 percent increase in population per year, which is lower than the countywide growth rate for the same time period. The proposed Project would be implemented in a densely populated urban area, and would be supported by current roads and infrastructure.

The DOF identifies the current (2021) County population as 10,044,458 persons and the City population as 111,425 persons.[1] The DOF population estimates are derived by multiplying the number of occupied housing units by persons per household. The persons per household estimates are based on SCAG's Connect SoCal.

Table 4-11-1: Population Estimates (2016-2045)

Jurisdiction	2016	2045	Percent Change[1]
County of Los Angeles	9,544,000	11,674,000	22%
City of Downey	113,300	119,200	5%

[1] Percent is rounded.

Source: SCAG Connect SoCal, 2020.

HOUSEHOLDS AND HOUSING

Table 4.11-2, Housing Estimates (2016-2044), shows the County and City household estimates in the SCAG 2020 Connect SoCal from 2016 to 2045.

Table 4.11-2: Household Estimates[2] (2016-2045)

Jurisdiction	2016	2045	Percent Change[1]
County of Los Angeles	3,319,000	4,119,000	17%
City of Downey	32,600	34,100	8%

[1]Percent is rounded.
[2]SCAG provides population, household, and employment forecasts, however, no housing forecasts.

Source: SCAG Connect SoCal, 2020.

As shown in **Table 4.12-3, Housing Stock (2012-2040),** the DOF estimates that the County's housing stock totals 3,614,809 housing units with an average of 2.92 persons per household and the City's housing stock totals 35,860 housing units with an average of 3.27 persons per household. The DOF estimates housing units by adding new construction and land annexations and subtracting housing that is removed (e.g., demolition) and adjusting for units lost or gained by conversions. Annual housing unit change data are supplied to the DOF by local jurisdictions and the U.S. Census Bureau. As reported by the DOF, the vacancy rate is a measure of the availability of housing in a community. The vacancy rate also correlates the types of units available to the market demand. A low vacancy rate suggests that households may have difficulty finding housing within their price range; a high supply of vacant units may indicate either the existence of a high number of desired units or an oversupply of units. The County's and City's vacancy rates are estimated at approximately 6.4 percent and 5.5 percent, respectively.

[1] State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State — January 1, 2011-2021*. Sacramento, California, January 2021.

Table 4.11-3: Housing Stock (2021)		
Jurisdiction	**County of Los Angeles**	**City of Downey**
Single-Family Homes: Attached and Detached	1,820,149	22,051
Multi-Family Homes: Two to more than Five Units	1,585,448	13,441
Mobile Homes	58,341	368
Total Housing Units	**3,614,809**	**35,860**
Vacancy Rate	6.4%[1]	5.5%[1]
Persons per Household	2.92	3.27
Source: State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State — January 1, 2011-2021. Sacramento, California, January 2021.		

4.11.3 REGULATORY SETTING

STATE

California Housing Element Law

The Housing Element is one of the seven General Plan Elements that are mandated by the State of California (California Government Code §§65580 to 65589.8). State law requires that the Housing Element provides, "an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing" (Government Code §65580).

State law requires that each city and county identify and analyze existing and forecasted housing needs within its jurisdiction and prepare goals, policies, and programs to further the development, improvement, and preservation of housing for all economic segments of the community, commensurate with local housing needs.

California Relocation Assistance Act

The California Relocation Assistance Act (Government Code §7260 et seq.) establishes uniform policies to provide for the fair and equitable treatment of people displaced from their homes or businesses as a direct result of state and/or local government projects or programs. The California Relocation Assistance Act requires that comparable replacement housing be made available to displaced persons within a reasonable period of time prior to the displacement. Displaced persons or businesses are assured payment for their acquired property at fair market value. Relocation assistance in the form of advisory assistance and financial benefits would be provided at the local level. This includes aid in finding a new home location, payments to help cover moving costs, and additional payments for certain other costs.

Homeowners and Private Property Protection Act In 2008

California voters approved Proposition 99, the Homeowners and Private Property Protection Act, which amended Section 19 of Article 1 of the California Constitution so that local governments are prohibited from using eminent domain authority to acquire an owner-occupied residence for the purposes of conveying it to a private recipient, with limited exceptions. Proposition 99 applies only to owner-occupied

residences. Cities may still use eminent domain authority to convey multifamily and non-residential property to other private parties.

REGIONAL

The RLASCSP area's demographics are examined in the context of existing and forecasted population and housing for the City and the County as a whole. Demographic information used in this analysis include, but are not limited to, the DGP Housing Element, and demographic information from the DOF and the California Economic Development Department.

Southern California Association of Governments (SCAG)

SCAG is a Joint Powers Agency established under §6502 et seq. of the California Government Code. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO) for the six-county region of Los Angeles, Orange, Ventura, San Bernardino, Riverside, and Imperial counties. The region encompasses a population exceeding 18 million persons in an area that encompasses more than 38,000 square miles. As the designated MPO, SCAG is the responsible agency for developing and adopting regional housing, population, and employment growth forecasts for local governments.

SCAG's demographic data is developed to enable the proper planning of infrastructure and facilities to adequately meet the needs of anticipated growth in the region. In October 2020, SCAG adopted its *Connect SoCal – The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* (Connect SoCal). Major themes in Connect SoCal include integrating strategies for land use and transportation; striving for sustainability; protecting and preserving existing transportation infrastructure; increase capacity through improved systems managements; providing more transportation choices; leveraging technology; responding to demographic and housing market changes; supporting commerce, economic growth and opportunity; promoting the links between public health, environmental protection and economic opportunity; and incorporating the principles of social equity and environmental justice into the plan. Growth forecasts contained in Connect SoCal are used as the basis of analysis for housing, population, and employment forecasts in this section.

Regional Housing Needs Assessment (RHNA)

RHNA is an assessment process performed periodically as part of the General Plan Housing Element updates at the local level. The RHNA process begins with the California Department of Housing and Community Development's (HCD) projection of future statewide housing growth need, and the apportionment of this need to regional councils of governments throughout the state. SCAG is the agency responsible for developing an allocation methodology to allocation the region's assigned share of statewide need to cities and counties by income level.

This "fair share" allocation concept seeks to ensure that each jurisdiction accepts responsibility for the housing needs of its resident population, as well as the jurisdiction's projected share of regional housing growth across all income categories. Regional growth needs are defined as the number of units that would have to be added in each jurisdiction to accommodate the forecasted number of households, as well as the number of units that need to be added to compensate for anticipated demolitions and changes to achieve an ideal vacancy rate. SCAG defines a "household" as an occupied dwelling unit.

The current RHNA cycle covers the planning period from October 2021 to October 2029. The housing construction need is determined for four broad household income categories: very low (households making less than 50 percent of area median income), low (50 to 80 percent of area median income), moderate (80 to 120 percent of area median income), and above moderate (more than 120 percent of area median income). The intent of the future needs allocation by income groups is to relieve the undue concentrations of very low-income and low-income households in a single jurisdiction and to help allocate resources in a fair and equitable manner.

Los Angeles County Community Development Commission

As a means of further leveraging housing assistance, the City cooperates with the Los Angeles County Community Development Commission and Los Angeles County Housing Authority to promote resident awareness and application for County run housing assistance programs. These programs include:

- Housing Economic Recovery Ownership (HERO),
- Home Ownership Program (HOP),
- American Dream Down Payment Initiative (ADDI),
- The Single Family Grant Program (SFGP), and
- The Single Family Rehabilitation Loan Program.

The County offers a variety of housing assistance programs that can supplement the City's current housing programs. As the City has little control over how the County's programs are administered the City will be responsible for providing program information on the City's website and at City Hall.

City of Downey General Plan, Vision 2025: City of Downey General Plan Housing Element

Housing Element

- **Goal 1:** Preserve and Improve Existing Housing Continued maintenance and preservation of the existing housing stock in Downey is crucial to ensure quality neighborhoods. Housing programs focused on the achievement of this goal include rehabilitation of single- and multi-family housing units, code enforcement, and efforts to preserve assisted housing units at risk of converting to market-rate housing. Through code enforcement, neighborhood, and home improvement programs, the City is able to maintain the condition of existing housing units.
    - **Policy 1.1:** Monitor and enforce building and property maintenance code standards in residential neighborhoods.
    - **Policy 1.2:** Promote the repair, revitalization, and rehabilitation of residential structures which have fallen into disrepair.
    - **Policy 1.3:** Promote increased awareness among property owners and residents of the importance of property maintenance to long-term housing values and neighborhood quality.
    - **Policy 1.4:** Provide a high quality of services to maintain the appearance of neighborhoods and quality of life of residents.
    - **Policy 1.5:** Pursue comprehensive neighborhood preservation.

- **Program 1:** Code Enforcement
- **Program 2**: The Housing Rebate and Grant Program
- **Program 3**: Monitor and Preserve Affordable Housing

- **Goal 2:** Encourage a variety of housing types to meet the existing and future needs of City residents.
  - **Policy 2.1:** Provide adequate sites and zoning to encourage and facilitate a range of housing to address the regional fair share allocation.
  - **Policy 2.2:** Encourage infill development and recycling of land to provide adequate residential sites.
  - **Policy 2.3:** Facilitate and encourage the development of affordable housing for seniors, large families, and other identified special housing needs.
  - **Policy 2.4:** Assist private and nonprofit developers in providing affordable housing to low-income residents and special needs groups.
    - **Program 5**: Housing Opportunity Sites
    - **Program 4**: Energy Efficient Design
    - **Program 6**: Second Unit Zoning
    - **Program 7**: Senior Housing Zoning

4.11.4 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Appendix G Guidelines contains the Initial Study Checklist, which includes questions concerning population and housing. The questions presented in the Initial Study Checklist have been utilized as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

- 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) (see Impact 4.12-1); and/or
- Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere (see Impact 4.12-2).

METHODOLOGY AND ASSUMPTIONS

The proposed Project is evaluated against the aforementioned significance criteria/thresholds, as the basis for determining the impact's level of significance concerning population and housing. In addition, this analysis considers the existing regulatory framework (i.e., laws, ordinances, regulations, and standards) that avoid or reduce the potentially significant environmental impact. Where significant impacts remain despite compliance with the regulatory framework, feasible mitigation measures are recommended, to avoid or reduce the Project's potentially significant environmental impacts.

4.11.5 IMPACTS AND MITIGATION MEASURES

Impact 4.11-1: Would implementation of the project induce substantial 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. The Project does not propose any development, however, the Project proposes new residential and employment-generating land uses, which could induce direct population growth in the area. As shown in **Table 4.11-4: City of Downey Existing and Project Build out Projections,** the Focus Area could accommodate 700 dwelling units (DUs). Based on the City's persons per households factor of 3.27, Project implementation could potentially increase the City's population by approximately 2,324 new persons or approximately 2.1 percent over existing conditions**.** Project implementation would not cause SCAG's 2045 population forecasts for the City to be exceeded. Therefore, the Project's incremental effects involving population growth through residential development would not induce substantial unplanned population growth.

Table 4.11-4: City of Downey Existing and Project Build out Projections

	Existing	Proposed	Change
Population	111,425 persons	113,749 persons	+2,324 persons
Housing Units (DU)	35,860 DU	36,560 DU	+700 DU
Employment	51,100 jobs	53,432 jobs	+1,932 jobs
Source: DOF, 2021, EED, 2021.			

The Project would allow for a maximum of approximately 1,130,000 SF of new non-residential, which could generate a maximum of 1,932 new job opportunities or approximately 3.7 percent over existing conditions in the Focus Area (**Table 4.11-4**).[2] Estimating the number of future employees would be highly speculative given that the Project does not propose any development. Further, population growth attributed to the Project and cumulative development is considered unlikely. The Employment Development Department (EED) identifies 6,700 unemployed persons in the City.[3] Therefore, it is anticipated that the new positions created by future development within the Focus Area could be filled by persons who already reside in the local region. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including those concerning population growth. Therefore, the Project would not induce substantial unplanned population growth directly or indirectly, a less than significant impact would occur, and no mitigation is required.

Mitigation Measures

No mitigation is required.

[2] Southern California Association of Governments. (2001). Employment Density Study Summary Report, page 4-16. Yorba Linda, CA: The Natelson Company, Inc.

[3] State of California Employment Development Department, *Labor Force and Unemployment Rate for Cities and Census Designated Places— City of Downey*. March 2021.

Impact 4.11-2: Would implementation of the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project does not propose to remove any residences or a change in zoning that would preclude housing within the Specific Plan area. Therefore, there would be no loss of existing housing. Rather, as previously mentioned, the proposed Project would allow for an increase of up to 700 DUs. No impact would occur and no mitigation is required.

Mitigation Measures

No mitigation is required.

4.11.6 CUMULATIVE IMPACTS

The prior analysis addresses potential impacts in the context of cumulative population, housing and employment growth in the City and County. Potential impacts are assessed relative to the DGP and regional plans, including SCAG's Connect SoCal population, housing, and employment projections. SCAG regional growth projections reflect recent and past trends, key demographic and economic assumptions and include local and regional policies. Local justifications participate in the growth forecast development process. The addition of residential units would help better balance the jobs to housing ratio.

Development activity in the City and surrounding area includes residential projects (see **Table 3-1** in **Section 3.0: Cumulative Analysis**). Most of the proposed development is consistent with the applicable General Plans would therefore be expected to be consistent with SCAG's growth projections.

Additionally, the Proposed Project is an infill Project; the Project would not extend infrastructure that would induce additional population growth outside of the local area, and would therefore not combine with other related projects to contribute to a cumulative impact with respect to population growth. Infrastructure would be developed and sized to support the Project, and not future projects. Should future projects be developed in the vicinity of the RLASCSP area, additional capacity and facilities would likely need to be developed at that time. In summary, the proposed Project—when combined with past, present and reasonably foreseeable future projects—would not cumulatively contribute to significant adverse cumulative impacts to population or housing. Impacts would be less than cumulatively considerable.

4.11.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable population or housing impacts have been identified.

4.11.8 REFERENCES

California Department of Finance. (2021). *Report E-5 Population and Housing Estimates for Cities, and Counties, and the State*. Sacramento, CA: California Department of Finance.

California Economic Development Department Labor Market Information Division. (2021). *Monthly Labor Data for Cities and Census Designated Places,* Sacramento, CA: Employment Development Department.

Southern California Association of Governments Website, *Connect SoCal – The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal),* September 2020.

Southern California Association of Governments. (2001). *Employment Density Study Summary Report,* page 4-16. Yorba Linda, CA: The Natelson Company, Inc.

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4.12 PUBLIC SERVICES AND RECREATION

4.12.1 INTRODUCTION

The purpose of this section is to describe the existing regulatory and environmental conditions related to the public services provided within the Rancho Los Amigos South Campus Specific Plan (RLASCSP or Specific Plan) area, inclusive of the Focus Area (Project site). This section also identifies potential impacts that could result from implementation of the RLASCSP Project (Project or proposed Project), and as necessary, recommends mitigation measures to avoid/reduce the significance of impacts related to fire and police protection services, schools, and recreational facilities. The issues addressed in this section are whether the Project would cause the need for new or physically altered facilities that would have significant environmental impacts. The data and analysis presented below is based on information from the City of Downey General Plan, Vision 2025 (DGP and DGP EIR) and the County of Los Angeles Rancho Los Amigos South Campus Project EIR (County Project EIR).

4.12.2 AFFECTED ENVIRONMENT

FIRE SERVICES

The City of Downey Fire Department (Fire Department) would provide fire protection services to the Specific Plan area, inclusive of the Focus Area. The Fire Department responds to both fire and emergency medical services incidents. The fire incidents will receive three engine companies, one truck company, one ambulance, and one battalion chief. Fire Station No. 1 would be the primary fire and emergency medical services responder. **Table 4.12-1, Downey Fire Stations in the Project Vicinity**, identifies the Project site's proximity to City fire stations.

Table 4.12-1: Downey Fire Stations in the Project Vicinity

Description	Location	Distance
Station #1	12222 Paramount Boulevard	1.1 miles
Station #2	9556 Imperial Highway	2.9 miles
Station #3	9900 Paramount Boulevard	3.4 miles
Station #4	9349 Florence Avenue	4.7 miles

Sources: Google Maps and https://www.downeyca.org/our-city/departments/fire/station-directory.

POLICE SERVICES

The Specific Plan area, inclusive of the Focus Area would be served by the Los Angeles County Sheriff's Department (Sheriff's Department), County Services Bureau. The Sheriff's Department serves a population of over 10 million people[1] with approximately 18,000 employees.[2] As noted in the Sheriff's Department response to the County's Rancho Los Amigos South Campus Project EIR's Notice of Preparation (NOP), received on October 3, 2017, the Sheriff's Department County Services Bureau currently provides security to the proposed Project's adjacent properties on a 24-hour basis, with one

[1] Department of Finance (DOF). (2021). *E-5 Population and Housing Estimates for Cities, Counties, and the State*

[2] Los Angeles Police Department. (2021). Accessed from https://www.lasd.org/about_us.html#:~:text=It%20is%20the%20largest%20Sheriff's,world%2C%20with%20approximately%20018%2C000%20employees.

deputy and one security officer assigned to each shift (day, night, and early mornings) 7 days a week. The closest Sheriff's Department Station is approximately 4.2 miles from the Focus Area.

SCHOOLS

The Project area is served by the Downey Unified School District (DUSD). The District serves approximately 22,064 students in grades K-12 with a student-teacher ratio of 25 to 1. The DUSD includes preschool centers at 9 school locations, 13 elementary schools (K-3 and K-5), 4 middle schools (6-8), 2 comprehensive high schools (9-12), 1 continuation high school (9-12), and 1 public, alternative school (7-12). **Table 4.12-2** lists the DUSD schools within approximately 1.5 miles of the Focus Area. Additionally, Rancho Los Amigos KinderCare Preschool is located northeast of the Focus Area at 7755 Golondrinas Street.

Table 4.12-2: DUSD Schools in the Project Vicinity

Description	Distance	Grades	Enrollment
Imperial Elementary School	0.6 mile	K-3	553
Old River Elementary School	1.0 miles	4-5	662
Stauffer Middle School	1.0 miles	6-8	1,343
Sussman Middle School	1.3 miles	6-8	1,138
Warren High School	1.5 miles	9-12	3,504
Source: Ed-data (2019-2020), Google Maps			

Additionally, there are two schools within a one-mile radius of the Focus Area. Hollydale Elementary School, a part of the Paramount Unified School District, is located at 5511 Century Boulevard in the City of South Gate, approximately 0.5 mile southwest of the Focus Area. St. Pius X-St. Matthias Academy, a private school located at 7851 Gardendale Street, is located adjacent to the southeast corner of the Focus Area.

LIBRARIES

The Los Angeles County Library provides library services to over 3.4 million residents living in unincorporated areas and to residents of 49 of the 88 incorporated cities of Los Angeles County, inclusive of the City of Downey. **Table 4.12-2** lists all libraries within 2.5 miles of the Focus Area. The Hollydale Library, Lynwood Library, and Downey City Library operate under the Los Angeles County Library system.

Table 4.12-3: Libraries in the Project Vicinity

Description	Distance
Hollydale Library	0.5 mile
Health Sciences Library	0.45 mile
Little Free Library	1.3 miles
Lynwood Library	2.5 miles
Downey City Library	2.5 miles
Source: Google Maps	

PARKS

There are 106 acres of public parks in the City. Apollo Park and Hollydale Park are neighborhood parks and are respectively located approximately 0.47 mile northeast and approximately 1,000 feet east of the Focus Area, respectively. Recreational facilities and gyms in the area include the Don Knabe Wellness Center, approximately 0.4 mile northwest of the Focus Area, and Winning Image Fitness, approximately 0.32 mile south of the Focus Area. Additional recreational facilities include Furman Park, located approximately 2.5 miles northeast of the Focus Area at 10419 Rives Avenue, and the Wilderness Park, located approximately 3.5 miles northeast of the Focus Area at 10999 Little Lake Road.

4.12.3 REGULATORY FRAMEWORK

STATE AND REGIONAL

California Governor's Office of Emergency Services (Cal OES)

Created in 1943, the California Governor's Office of Emergency Services (Cal OES) provides emergency service and funding to local communities within the state. The Cal OES operates with six goals in mind:

- Anticipate and enhance prevention and detection capabilities to protect California from all hazards and threats.
- Strengthen California's ability to plan, prepare for, and provide resources to mitigate the impacts of disasters, emergencies, crimes, and terrorist events.
- Effectively respond to and recover from both human-caused and natural disasters.
- Enhance the administration and delivery of all state and federal funding and maintain fiscal and program integrity.
- Develop a united and innovative workforce that is trained, experienced, knowledgeable, and ready to adapt and respond.
- Strengthen capabilities in public safety communication services and technology enhancements.[3]

2016 California Fire Code

California Code of Regulations (CCR) Title 24, Part 9 makes up the 2016 California Fire Code (CFC). The CFC contains regulations regarding construction and maintenance of building, the management of wildland-urban interface area, and others. The code is intended to establish standards and best practices regarding hazards from fire and other dangerous conditions. The CFC also is intended to provide assistance to firefighters and other emergency responders during their operations. The CFC is updated every three years and was last updated in 2016, and adopted in 2017.[4]

[3] California Governor's Office of Emergency Services. (2019). *About Cal OES.* Retrieved from https://www.caloes.ca.gov/cal-oes-divisions/about-cal-oes.

[4] California Building Standards Commission. (2016). *2016 California Fire Code.* Page 3. Sacramento, CA: California Building Standards Commission.

School Facility Program

California's system for financing school facilities can be generally described as a cooperative effort between the state and local school districts. The state provides districts with financial support for new school construction and modernization projects through the School Facility Program (SFP). It funds the SFP through statewide, voter-approved bonds. Local school districts finance their share of school construction and modernization project costs primarily with revenue raised through local General Obligation (GO) bond elections.

California State Assembly Bill 2926: School Facilities Act of 1986

To assist in providing school facilities to serve students generated by new development, Assembly Bill (AB) 2926 was enacted in 1986 and authorizes a levy of impact fees on new residential, commercial, and industrial development. The bill was expanded and revised in 1987 through the passage of AB 1600, which added §§66000 et seq. to the Government Code. Under this statute, payment of impact fees by developers serves as CEQA mitigation to satisfy the impact of development on school facilities.

Senate Bill 50

Senate Bill (SB) 50 (1998), which is funded by Proposition 1A, limits the power of cities and counties to require mitigation of developers as a condition of approving new development and provides instead for a standardized fee. SB 50 generally provides for a 50/50 state and local school facilities match. SB 50 also provides for three levels of statutory impact fees. The application level depends on whether state funding is available; whether the school district is eligible for state funding; and whether the school district meets certain additional criteria involving bonding capacity, year-round schools, and the percentage of moveable classrooms in use.

California Government Code §§65995-65998 sets forth provisions to implement SB 50. Specifically, in accordance with §65995(h), the payment of statutory fees is "deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization…on the provision of adequate school facilities." The applicable school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

Pursuant to Government Code §65995(i), "A state or local agency may not deny or refuse to approve a legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization as defined in §56021 or 56073 on the basis of a person's refusal to provide school facilities mitigation that exceeds the amounts authorized pursuant to this section or pursuant to §65995.5 or 65995.7, as applicable."

California Education Code §17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities.

Quimby Act

The Quimby Act (Government Code §66477) provides that the legislative body of a city or county may, by ordinance, require the dedication of land or impose a requirement of the payment of fees in lieu thereof, or a combination of both, for park or recreational purposes as a condition to the approval of a tentative

map or parcel map, provided certain requirements are met. This section further states that "the dedication of land, or the payment of fees, or both, shall not exceed the proportionate amount necessary to provide three [3.0] acres of park area per 1,000 persons residing within a subdivision subject to this section."

LOCAL

City of Downey Vision 2025 General Plan

The City of Downey's Vision 2025 General Plan (DGP) lays out the City's guiding policies and goals regarding its long-term growth and planning. The SBGP is broken down into sections that each focus on a different aspect of life in the City; with topics such as land use and public facilities. The DGP is an important and useful planning tool.

Safety Element

- **Goal 5.3:** Maintain and improve fire protection services.
    - **Policy 5.3.1:** Provide adequate response to fire emergencies.
- **Program 5.3.1.1: Identify and maintain an acceptable response time for fire emergency service calls.**
- **Goal 5.4:** Promote the protection of life and property from criminal activities.
    - **Policy 5.4.1:** Prepare for adequate response to crime.
    - **Program 5.4.1.2:** Maintain an acceptable response time for police emergency service calls.

Open Space Element

- **Goal 7.2:** Optimize the use of established public parks to meet the needs of residents.
    - **Policy 7.1.1:** Upgrade existing park facilities.
    - **Policy 7.1.7:** Maintain an adequate level of recreational staffing at park facilities.

City of Downey Municipal Code

Pursuant to the Downey Municipal Code (DMC) Chapter 3, *Fire Code*, and Chapter 1, *Downey Building Code*, the City has adopted the 2019 California Fire Code, the 2019 California Building Code. All development within the City of El Segundo must comply with these standards to ensure fire safety precautions during Project demolition and construction, adequate emergency access (during demolition, construction and operation), and fire hydrant, fire sprinkler, and fire alarm system availability. DMC Chapter 5-9512.22g, *Development Impact Fees,* was adopted for the purpose of imposing mitigation fees on applicants seeking to construct development projects. The purpose of such fees is to minimize, to the greatest extent practicable, a new development's impact on the City's public services and public facilities. Toward that end, the City intends that applicants for such development projects pay their fair share of the costs of providing such public services and public facilities (including but not limited to park fees, fire fees, sanitary sewer trunk line fees, storm drain trunk line fees, street tree fees, library fees, or traffic impact fees).

4.12.4 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, *Environmental Checklist Form*, includes questions pertaining to public services. The issues presented in the Environmental Checklist have been used as thresholds of significance in this section. Accordingly, the Project would have a significant adverse environmental impact if it would:

- 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, libraries, and parks. (Impacts 4.12-1 through -6)
- 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. (Impact 4.12-6).
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. (Impact 4.12-7).

METHODOLOGY AND ASSUMPTIONS

The proposed Project is evaluated against the aforementioned significance criteria, as the basis for determining the level of impacts related to public services. The analysis considers the existing regulatory framework (i.e., laws, ordinances, regulations, and standards) that avoid or reduce the potentially significant environmental impact. Where significant impacts remain despite compliance with the regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project's potentially significant environmental impacts.

4.12.5 IMPACTS AND MITIGATION MEASURES

Impact 4.12-1: 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 fire protection?

Less than Significant. The Fire Department would provide fire protection services to the Focus Area. The Project does not propose any development. However, future development facilitated would allow for 700 dwelling units (DUs) and 1,130,000 square feet (SF) of new non-residential land uses. Future development facilitated by the Project could incrementally increase the demand for fire protection services. The site is in an urbanized location near existing infrastructure (e.g., roads and utilities) and would be located near areas already served by the Fire Department. When demand is great enough in a given region, additional fire facilities would be built. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including the most current California Fire Code and DMC Chapter 3, *Fire Code,* as well as DMC Chapter 1, *Downey Building Code*, and the 2019 California Building Code. Further, future development would be subject to compliance with fire protection development impact fees set

forth in DMC Chapter 5-9512.22g, *Development Impact Fees.* Payment of these fees would help fund and construction of new fire facilities and would minimize the Project's operational impacts to fire protection services to the greatest extent practicable. Should new fire stations be needed to ensure adequate response times, environmental impacts would be associated with their construction to the extent that their location, construction methods and operations affect the surrounding area. Compliance with state and local laws, and standard conditions would reduce physical impacts associated with the provision of new or physically altered governmental facilities to a less than significant impact, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.12-2: 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 police protection?

Less Than Significant. The Los Angeles County Sheriff's Department (Sheriff's Department) provides police protection services and law enforcement services. The Project does not propose any development. However, future development facilitated would allow for a maximum of approximately 700 DUs and 1,130,000 SF of new non-residential land uses. Future development facilitated by the Project could incrementally increase the demand for police protection services. Future development would occur in urbanized locations and would be located near areas already served by the Sheriff's Department. When demand is great enough in a given region, additional police facilities would be built as needed. Future development would be subject to police protection development impact fees set forth in DMC Chapter 5-9512.22g, *Development Impact Fees*. The Sheriff's Department's ability to support the needs of future growth is dependent upon their financial ability to hire additional deputies. In addition, a growing population would require that the Sheriff's Department secure sites for and construct new detention facilities on a timely basis. Payment of these fees would help fund and construction of new police facilities and would minimize the Project's operational impacts to police protection services to the greatest extent practicable.

Future development facilitated by the Project would only incrementally increase police service needs in any given region. These small increases would not result in a significant impact on police service response times in these areas. Where new police stations are needed to ensure adequate response times, environmental impacts would be associated with their construction to the extent that their location, construction methods and operations affect the surrounding area. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements Compliance with state and local laws would reduce physical impacts associated with the provision of new or physically altered governmental facilities to a less than significant impact, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.12-3: 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 schools?

Less Than Significant. The RLASCSP area is served by the Downey Unified School District (DUSD). Future development facilitated by the Project would generate student population growth in the DUSD which would incrementally increase the demand for school facilities and services. Any future housing development facilitated by the Project would be required to comply with SB 50 requirements, which allow school districts to collect impact fees from developers of new residential projects to offset the cost of new development. Future applicants would be subject to school developer fees from the DUSD. These fees are evaluated on a yearly basis and would be collected at the time of permit issuance. Pursuant to Government Code §65995(3)(h), "payment of statutory fees is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use or development of real property…". Payment of these fees would provide an adequate financial base to construct and equip new and existing schools. Therefore, future housing development facilitated by the Project would not result in substantial adverse physical impacts associated with the provision of new school facilities. Impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.12-4: 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 library services?

Less Than Significant. The Los Angeles County Library provides library services to the City. Future development facilitated by the Project would generate planned population growth, which could incrementally increase the demand for library services. Future development facilitated by the Project would occur in urbanized locations near existing facilities that currently provide service to these areas. Therefore, it is anticipated that the increased demand would not be substantial or such that it would warrant construction of a new facility. The County Board of Supervisors would ultimately be responsible for future modifications and or expansion to accommodate growth within its service area. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new library facilities. Impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.12-5:	**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 parks?**
Impact 4.12-6:	**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. Although the Project does not propose any development, future development facilitated by the Project would generate planned population growth (see **Section 4.11, Population and Housing**). The five-acre Rancho Los Amigos South Campus Sports Center will be located adjacent to the Focus Area, providing additional recreation area, including three multi-purpose sports fields. This addition could help satisfy any demand generated by future development facilitated by the proposed Project.

Future development would be subject to compliance with DMC Chapter 5-9512.22g, *Development Impact Fees.* Payment of these fees would help fund the acquisition and development of new or rehabilitating existing park and recreational facilities needed to accommodate added demands created by population growth. If in the future it is determined that construction of new recreational facilities is warranted, that proposal would be subject to discretionary permits and CEQA evaluation prior to approval to determine whether adverse physical effects on the environment would occur. Adherence to mandatory discretionary permit requirements and regulations for providing recreation would support the City's goals for providing sufficient recreation opportunities for residents. For these reasons, the Project and future housing development facilitated by the Project would not result in substantial physical deterioration of existing neighborhood or regional parks. Therefore, a less than significant impact would occur regarding the construction and expansion of recreational facilities and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.12-7:	**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?**

The Project does not propose any development. If in the future it is determined that construction of new recreational facilities is warranted, that proposal would be subject to discretionary permits and CEQA evaluation prior to approval to determine whether adverse physical effects on the environment would occur regarding the construction or expansion of recreational facilities. Additionally, future development facilitated by the Project would be subject to compliance with DMC Chapter 5-9512.22g, *Development Impact Fees.* Therefore, the Project would not result in an adverse physical effect on the environment concerning construction or expansion of recreational facilities. Impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation is required.

4.12.6 CUMULATIVE IMPACTS

Fire and Police Services. The Project assumes the provision of fire and police protection services is based on a combination of existing services, the use of mutual aid, and the payment of development fees. Tax-base expansion from development of the proposed Project as well as past, present, and reasonably foreseeable future projects would generate funding for services. Development projects would generate residents and businesses which could place burdens on public services potentially resulting in significant impacts to service providers. However, payment of fees and the implementation of mitigation on a project-by-project basis would reduce impacts to a less than significant level and no cumulative impacts would result.

Schools. Future applicants for development within the Specific Plan area, the sponsors of all past projects since the passage of SB 50, all present projects, and reasonably foreseeable future projects would be required to pay school impact fees established to offset potential impacts on school facilities. Payment of these fees is considered to be full and complete mitigation of school impacts. Therefore, although the Project and other cumulative development could result in additional students and the need for additional facilities, payment of the fees mandated under SB 50 is the mitigation measure prescribed by the statute, and payment of the fees is deemed full and complete mitigation.

Libraries. Based on the PEIR's significance criteria, cumulative impacts would result if the Project, in combination with past, present, and reasonably foreseeable future development, would require the construction of library facilities or the alteration of existing library facilities that could cause significant environmental impacts. The proposed Project would not create a need for new or expanded library facilities. Funding for new library facilities is provided under the guidance of the County Board of Supervisors.

Recreation. Although the proposed Project would introduce more people into the area and generate an increment increase in the demand for parks and recreational facilities, future projects in the Specific Plan area would pay development fees. Further, the five-acre Rancho Los Amigos South Campus Sports Center would be located adjacent to the Focus Area. As with all residents of and visitors to the City, future Project residents and businesses would have access to all public recreational facilities in the City and County. Increased visitation at any offsite park facilities would not be large enough to cause substantial physical deterioration; no significant physical impacts to park and recreation facilities would occur. The Project, therefore, would not combine with cumulative projects to result in a cumulatively significant impact to parks and recreational spaces.

4.12.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable aesthetic impacts have been identified.

4.13 TRANSPORTATION

4.13.1 INTRODUCTION

This section analyzes the potential transportation and traffic effects of future development in the Rancho Los Amigos South Campus Specific Plan (RLASCSP) area's Focus Area. It uses information provided in the County of Los Angeles Rancho Los Amigos South Campus Project Final EIR (County Project EIR) Section 3.11, Transportation. The analysis conducted for the County Project EIR is representative of general site conditions throughout the South Campus. That EIR and the detailed studies therein adequately addresses the transportation and traffic present within the RLASCSP.

4.13.2 AFFECTED ENVIRONMENTS

STUDY AREA ROADWAY SYSTEM

Regional Facilities

The RLASCSP is near four freeways. The site is approximately one mile north of Interstate 105 (I-105), one mile east of I-710, three miles southwest of I-5, and three miles west of I-605. Regional access to the Focus Area is provided from I-105 and I-710, with interchanges at Imperial Highway and Paramount Boulevard:

- **I-105** is an east-west freeway that extends from El Segundo to Norwalk. In the project vicinity, one high-occupancy vehicle (HOV) lane and three to four mixed-flow travel lanes are provided in each direction on I-105. Eastbound and westbound ramps are provided on I-105 at Garfield Avenue and Paramount Boulevard in the vicinity of the Focus Area.
- **I-710** is a north-south freeway that extends from the City of Alhambra to the City of Long Beach. In the project vicinity, four mixed-flow travel lanes are provided in each direction. Northbound and southbound ramps are provided on I-710 at Imperial Highway in the vicinity of the Focus Area.

Local Facilities

The RLASCSP area is served by a number of roadways that provide access to and from the Specific Plan area, inclusive of the Focus Area. Local vehicular access to the RLASCSP area from the north and south is provided from Imperial Highway and Gardendale Street, respectively. Imperial Highway is a major arterial with a general northwest to southeast orientation north of the Specific Plan area. Gardendale Street is a secondary arterial with a northwest to southeast orientation that is adjacent to the southern boundary of the Focus Area. The Union Pacific Railroad (UPRR) corridor runs generally north to south in this area and crosses Gardendale Street.

Access to the Specific Plan area from the east and west is limited by the local streets in the surrounding residential neighborhoods, which end in cul-de-sacs. Limited access from the east and west is provided via Laurel Avenue, Erickson Avenue, Dahlia Avenue, and Consuelo Street. Erickson Avenue is the primary local arterial that bisects the area in a north to south orientation, from Gardendale Street to Imperial Highway. Garfield Avenue is a primary arterial that traverses the southwest portion of the area and has a northwest to southeast orientation, but provides limited access due to the barrier created by the UPPR corridor.

Bicycle and Pedestrian Facilities

There are existing bicycle lanes along the southern border of the Specific Plan area on Gardendale Street, between Paramount Boulevard and Garfield Avenue. On-street bicycle lanes (Class II facilities) are provided in each direction. The City of Downey (City) Bicycle Master Plan, which was adopted in July 2015[1], identifies planned bicycle improvements in and around the Specific Plan area. These facilities have been considered and incorporated into the Specific Plan.

The Rio Hondo, Los Angeles River, and San Gabriel River Multi-Use Trails provide walking and bicycling facilities for regional travel to and from the RLASCSP area. Additionally, there are existing pedestrian facilities provided within the internal roadway network of the Focus Area. Additionally, there are sidewalks provided along Gardendale Street in both directions.

Transit Services

Metro bus lines are currently the only form of public transit in and around the Specific Plan area. There are existing Metro bus stations north of the Focus Area at Imperial Highway at Garfield Avenue and Imperial Highway at Amery Avenue. The following Metro lines serve the RLASCSP Area and are as follows:

- **Metro Line 117** runs in an east-west direction from LAX airport to the Lakewood Green Line Station in the southern portion of the City. Metro Line 117 has 10 bus stops (five in each westbound and eastbound direction) at Imperial Highway at Garfield Avenue, Imperial Highway at Amery Avenue, Imperial Highway at Old River School Road, Imperial Highway at Erickson Avenue, and Imperial Highway at Rives Avenue. These bus stops are adjacent to the northern RLASCSP boundary and approximately 0.30 miles north of the Focus Area.
- **Metro Line 120** runs in an east-west direction from LAX Airport to Whittwood Mall in the City of Whittier and shares the same bus stop routes as 117.
- **Metro Line 258** runs in a north-south direction from the City of South Pasadena to the City of Paramount. Metro Line 258 has two bus stops along Garfield Avenue, one north of Imperial Highway and one south, approximately 0.30 miles north of the Focus Area boundaries within the RLASCSP.

4.13.3 REGULATORY SETTING

STATE

California Department of Transportation (Caltrans)

Caltrans administers federal and state transportation funds and programming, which is the public decision-making process that sets priorities for projects envisioned in long-range transportation plans. Caltrans commits expected revenues over a multi-year period to transportation projects. The Statewide Transportation Improvement Program (STIP) is a multi-year capital improvement program of transportation projects on and off the State Highway System, funded with revenues from the State Highway Account and other sources.

[1] 2005 General Plan Annual Report for January 1, 2015 through December 31, 2015.

Senate Bill (SB) 743

On September 27, 2013, Senate Bill (SB) 743 was signed into law. SB 743 started a process that fundamentally changed transportation impact analysis as part of CEQA compliance. These changes include the elimination of auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts. SB 743 required the Governor's Office of Planning and Research (OPR) to propose revisions to the State CEQA Guidelines establishing new criteria to "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code [PRC] §21099(b)(1)).

State CEQA Guidelines §15064.3(b) was adopted in December 2018 by the California Natural Resources Agency. These revisions to the CEQA Guidelines shift the focus of CEQA transportation analyses from driver delay to reduction of greenhouse gas emissions, creation of multimodal networks, and promotion of a mix of land uses (which in turn reduces regional vehicle trips). Vehicle miles traveled (VMT) is a measure of the total number of miles driven to or from a development and can be expressed in either total VMT or as an average per person.

The newly adopted guidance provides that a lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section applied statewide. The City of Downey follows the County of Los Angeles Public Works Transportation Impact for screening criteria and guidelines for evaluating VMT impacts.

SB 743 also sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." As defined by PRC] § 21099, a TPA is an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to §450.216 or §450.322 of Title 23 of the Code of Federal Regulations. Based on this definition of a TPA, the proposed Project is within a TPA as defined above and, as it applies to this section of the PEIR, is exempt from parking impacts.

REGIONAL

Connect SoCal: SCAG Regional Transportation Plan/Sustainable Communities Strategy

SCAG's Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy was adopted in 2020. Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It considers the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future, identifying regional transportation strategies to address mobility needs.

The Connect SoCal includes new strategies to promote active transportation, supports local planning and projects that serve short trips, expand understanding and consideration of public health in the development of local plans and projects, and supports improvements in sidewalk quality, local bike networks, and neighborhood mobility areas. It also proposes increasing access to the California Coast Trail, light rail and bus stations, and promoting corridors that support biking and walking, such as through a regional greenway network and local bike networks. Connect SoCal proposes to better align active

transportation investments with land use and transportation strategies, increase competitiveness of local agencies for federal and state funding, and to expand the potential for all people to use active transportation.

Los Angeles County Metropolitan Transportation Authority

The Los Angeles County Metropolitan Transportation Authority (Metro) is responsible for programming and administering local transportation sales tax funds. The majority of Metro funding is provided from the Proposition A, C and Measure R local sales taxes. The Proposition A and C sales tax collects percentages on retail sales in the County to fund transportation purposes, including but not limited to rail development, municipal bus operations, expand bus and rail security, and construction of transit centers. Measure R authorized an additional percentage of sales tax to fund traffic relief and rail expansion. The Measure R sales tax became effective July 1, 2009 and would remain in effect for 30 years.[2]

LOCAL

City of Downey's Vision 2025 General Plan

The City of Downey has developed goals, policies, and programs containing several elements, practices, and activities aimed at reducing and eliminating adverse impacts from traffic. The Vision 2025 General Plan (DGP) Circulation Element includes six programs that are potentially relevant to the design and implementation of the proposed Project:

- **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.
- **Program 2.1.2.6.** Identify and concentrate land uses with high traffic generation near major transportation corridors and public transit facilities.
- **Program 2.2.1.1.** Promote site development design that is safe and convenient to pedestrians.
- **Program 2.2.1.2.** Provide sidewalks in new development and major remodeling consistent with sidewalk Master Plan.
- **Program 2.2.2.1.** Encourage the use of bicycling as a form of transportation for employment commuting and business purposes, in addition to recreational purposes.
- **Program 2.2.3.2.** Promote ridesharing through provision of information to the public.
- **Program 2.5.1.9.** Provide adequate on-site loading areas so that parking areas are not impacted by loading activities.

Rancho Business Center Specific Plan 88-1 (SP 88-1) Circulation Element

Specific Plan 88-1 (SP 88-1) planned for the development of 2,247,694 square feet (SF) of light industrial development on the 120.9-acre Rancho Business Center. At buildout, SP 88-1 was expected to generate 15,745 daily vehicle trips. To offset the effects of project development on traffic and circulation, SP 88-1

[2] Metro, *Proposition A & C and Measure R Sales Taxes*, Available at: https://www.metro.net/about/financebudget/taxes/#, Accessed June 2, 2021.

required the coordination of traffic improvements with the Rancho Business Center's scheduled phasing plan. Traffic improvements included:

- Construction of a "Link Road" between Erickson Avenue and Gardendale Street
- Construction of the Erickson Avenue/Imperial Highway ramp system
- Reconstruct and realign Erickson Avenue
- Offsite roadway and intersection improvements
- Planning area roadway and intersection improvements
- Intersection improvements to Garfield Avenue/Imperial Highway and the Old River School Road/Imperial Highway intersections
- Preparation of a traffic study assessing Phase II, III, and Phase IV cumulative traffic impacts that will determine the need for mitigation measures

All of the above improvements are assumed to have been implemented over the buildout of SP 88-1.

4.13.4 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G contains the Initial Study Checklist, which includes questions concerning Transportation. The questions presented in the Initial Study Checklist have been used as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities (see Impact 4.13-1);
- Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b) (see Impact 4.13-2);
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) (see Impact 4.13-3); and/or
- Result in inadequate emergency access (see Impact 4.13-4).

METHODOLOGY AND ASSUMPTIONS

This analysis considers the State CEQA Guidelines, Appendix G thresholds, as described above, in determining whether the Focus Area would result in transportation impacts. The evaluation was based on a review of regulations and determining their applicability to future development facilitated by the RLASCSP. VMT impacts per CEQA Guidelines §15064.3(b) were evaluated qualitatively based on the Los Angeles County Traffic Impact Assessment Guidelines. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements. This could include the preparation of traffic studies and VMT analyses.

4.13.5 IMPACTS AND MITIGATION MEASURES

Impact 4.13-1: Would implementation of 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. While the Project would not result in direct construction of residential or non-residential uses, it would facilitate and provide a policy framework for future development within the Specific Plan area. The RLASCSP, specifically the Focus Area, proposes a TOD sub-district to facilitate transit-supportive uses around the future Metro Gardendale Transit Station, through adjacent higher density residential or connective complete street improvements, including pedestrian access through the RLASCSP. The intent of the RLASCSP is to create a mixed-use, compact, and multi-modal environment and promote sustainable principles in design and development by reducing dependency on vehicle trips. RLASCSP buildout could accommodate a maximum of 700 dwelling units (DUs) and 1,130,000 SF of new non-residential (commercial, retail, office, public facilities, etc.) uses.

The proposed Project is consistent with DGP Circulation Element Program 2.1.2.6, which aims to concentrate high traffic-generating land uses near major transportation corridors and public transit facilities. Future residents and employees would have access to public transit opportunities provided in the Focus Area, which would reduce dependency on personal vehicles.

The Project objectives include enhancing the pedestrian scale and function of the built environment within the Focus Area, which is consistent with DGP Circulation Element Program 2.2.1.1. This Circulation Element Program which aims to promote site development design that is safe and convenient to pedestrians.

SCAG's Connect SoCal identifies the need to create sustainable, mixed-use communities conducive to public transit, walking, and biking by promoting development along major existing transit and transportation corridors. The RLASCSP is consistent with the goals of Connect SoCal.

All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements. This includes policies and regulations required to improve public access and safety for people who walk and bike, and improve the transportation system, as applicable. Further, future development within the RLASCSP would be required to adhere to all state requirements for consistency with transportation plans. As a result, future development facilitated by the RLASCSP would not conflict with an adopted program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.13-2: Would the project would not conflict or be inconsistent with CEQA Guidelines §15064.3?

Less than Significant Impact. In accordance with SB 743, State CEQA Guidelines §15064.3(b) was adopted in December 2018 by the California Natural Resources Agency. These revisions to the CEQA Guidelines criteria for determining the significance of transportation impacts are primarily focused on projects within transit priority areas, and shifts the focus from driver delay to reduction of greenhouse gas emissions, creation of multimodal networks, and promotion of a mix of land uses. Vehicle miles traveled, or VMT, is a measure of the total number of miles driven to or from a development and is sometimes expressed as an average per trip or per person.

State CEQA Guidelines §15064.3(b)(1) provides that "VMT traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within 0.5 mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact".

In December 2018, the State Office of Planning and Research (OPR) issued a Technical Advisory on evaluating transportation impacts in CEQA that provides the following screening criteria for land development projects that may result in a less than significant VMT impact:

- Local-serving retail less than 50,000 SF, including schools, daycare, student housing, etc.
- Small projects generating less than 110 trips per day
- Residential and office projects located in areas with low VMT
- Projects near transit stations or a major transit stop that is located along a high quality transit corridor
- Residential projects with a high percentage of affordable housing

In addition, the Technical Advisory describes that projects with the following may result in a VMT impact:

- Has a Floor Area Ratio (FAR) of less than 0.75
- 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 inconsistent with the applicable Sustainable Communities Strategy (as determined by the Lead Agency with input from the Metropolitan Planning Organization)

The City has adopted the Los Angeles County Public Works Transportation Impact Analysis Guidelines, which outlines the process for evaluating a project's impacts concerning VMT. The Los Angeles County Guidelines are consistent with OPR's screening criteria. Therefore, potential project-related VMT impacts have been assessed qualitatively based on guidance from the OPR Technical Advisory.

The proposed Project would not result in direct construction but would facilitate and provide a policy framework for future development within the Focus Area of the RLASCSP. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would

be required to demonstrate consistency with DGP policies and DMC requirements that address the circulation systems.

As previously noted, within the Focus Area, the RLASCSP assumes a maximum development of 700 DU and 1,130,000 SF of new, non-residential land uses. VMT is a measure of the transportation system's impact on the climate, the environment, and human health. VMT also provides an indication of the access to economic and social opportunity, with lower VMT areas requiring less driving and generally providing better access to daily destinations such as jobs and services. The proposed Project's incorporation of residential and non-residential land uses in the Focus Area in an existing urban environment provides the opportunity to reduce VMT through shorter travel distances between work and home. As a result, VMT per capita would be expected to decrease as a result of RLASCSP implementation.

Future commercial development projects within the Focus Area may qualify for the OPR screening criteria of local-serving retail less than 50,000 SF. Additionally, future development within the TOD sub-district, intended to create transit-supportive uses around the future Metro Gardendale Transit Station, would meet OPR's screening criteria for projects near transit stations or a major transit stop that is located along a high quality transit corridor. Although the Metro Project is currently in the planning and environmental review phase, it is expected to be completed prior to the RLASCSP 2035 buildout year. The Metro Project would provide transportation access between downtown Los Angeles and other suburbs in southern Los Angeles County. Providing a major transit hub within the Focus Area of the RLASCSP would also reduce VMT per capita, as future residents and employers have additional transit opportunities to major employment centers in Los Angeles County. **Table 4.13-1: Baseline VMT for South Los Angeles County** provides the baseline VMT thresholds at the time the VMT guidelines were adopted in 2020. Future projects would be subject to the baseline VMT based on the year a transportation study is prepared, if applicable and required.

Table 4.13 1: Baseline VMT for South Los Angeles County

Baseline Area	Residential VMT per Capita	Employment VMT per Employee	Total VMT per Service Population
South County	12.7	18.4	31.1

Source: Los Angeles County Public Works Transportation Impact Analysis Guidelines, July 2020.

The proposed Project is consistent with SCAG's Connect SoCal. The Project would support the Connect SoCal overall land use pattern of reinforcing the trend of locating new housing and employment in High Quality Transit Areas with the intent of reducing VMT and GHG. The proposed Project would also help increase the share of total trips that use transit. As discussed previously, there is limited transit service within the RLASCSP area. Metro provides bus service along Imperial Highway although there are no existing bus stops adjacent to the Focus Area. The TOD sub-district would provide residential and employment opportunities closer to major transit hub, which would ultimately reduce VMT per capita in the City.

All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements. Any traffic demand measures required for mitigation would be required to comply with DGP Circulation Element Program 2.1.2.6., which aims to encourage and facilitate high traffic generation land uses near public transit facilities, such as the future Metro Gardendale Transit Station. The Focus

Area is within a previously urban and developed area, and therefore future in-fill development facilitated by the RLASCSP would be expected to reduce VMT. Future housing and commercial development within the TOD sub-district of the Focus Area would provide more housing closer to employment and commercial areas, further increasing opportunities to reduce VMT and increase the ease of walking, cycling, and using public transit. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Impact 4.13-3: Would implementation of the project substantially increase hazards due to a geometric design feature?

Less than Significant Impact. The proposed Project would not result in direct construction but would facilitate future development within the Focus Area of the RLASCSP. Because future development facilitated by the RLASCSP would occur on previously developed properties within the Specific Plan area, existing roadways that are connected and adjacent to the existing transportation networks would not change, and hazards due to a geometric design feature or incompatible uses are not anticipated. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including the potential to increase hazards due to a geometric design feature. All Project site roadways and driveways would be designed to comply with City Building and Safety Division standards. Future development construction is not anticipated to require the removal or relocation of existing transit stops and would be designed and configured to avoid potential conflicts with transit services and pedestrian traffic. Future development facilitated by the RLASCSP would be required to comply with applicable building and fire safety regulations required for the design of new housing and commercial buildings (DMC §3300 – Fire Code, DMC §8000 – Downey Building Code), and emergency access; and would be required to adhere to all state and local requirements for avoiding construction and operations impacts related to design and incompatible uses. As a result, future development facilitated by the RLASCSP would not substantially increase hazards due to design features or incompatible uses. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Impact 4.13-4: Would the project result in inadequate emergency access.

Less than Significant Impact. The Project would not result in direct construction of residential or non-residential uses but would facilitate and provide a policy framework for future development within the Project area. Future projects would be required to adhere to traffic control management for construction per DMC §3123 - Permits. The City's Traffic Engineering Division Section is responsible for reviewing temporary traffic control management for construction and traffic safety analysis and mitigation programs. Future development projects facilitated by the RLASCSP would be required to adhere to DMC §9820 – Site Plan Review, which would require plan check and review of construction management plans and traffic control plans by the City's Traffic Engineering Division Section.

Future development construction is not anticipated to result in the closure of lanes on the surrounding roadway network, such as Gardendale Street and Imperial Highway. The Focus Area would be served by existing emergency response agencies and be accessible to emergency responders throughout the buildout of the RLASCSP. Therefore, a less than significant impact associated with an emergency response plan or emergency evacuation plan would occur.

Mitigation Measures

No mitigation required.

4.13.6 CUMULATIVE IMPACTS

Future development facilitated by the RLASCSP, in conjunction with cumulative development in the City, would increase development in previously developed areas and could result in transportation impacts. Future development would be subject to discretionary permits and require CEQA evaluation at the project-level. This means that each cumulative project would require separate discretionary approval and CEQA assessment, which would address potential transportation impacts and identify necessary mitigation measures, where appropriate.

Consequently, future development facilitated by the RLASCSP would not result in significant environmental transportation-related impacts, nor would future development conflict with or obstruct a state or local plan or regulation related to transportation. Therefore, the RLASCSP would not cause a cumulatively considerable transportation impact, and no mitigation measures are required.

4.13.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant and unavoidable impacts would occur.

4.13.8 REFERENCES

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4.14 TRIBAL CULTURAL RESOURCES

4.14.1 INTRODUCTION

This section of the PEIR provides contextual background information on tribal cultural resources on or near the Rancho Los Amigos South Campus Specific Plan (RLASCSP), inclusive of the Focus Area (Focus Area), including the area's prehistoric, ethnographic, and historical settings. This section also analyzes potential impacts on tribal cultural resources resulting from implementation of development facilitated by the Project and identifies mitigation measures to reduce or avoid potential impacts. The data and analysis presented below is based on information from the City of Downey General Plan Vision 2025 (DGP and DGP EIR), and the County of Los Angeles Rancho Los Amigos South Campus Project EIR (County Project EIR).

Tribal cultural resources, as defined in Public Resources Code (PRC) §21074, include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (California Register) or included in a local register of historical resources, or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant. A cultural landscape that meets these criteria is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. Historical resources, unique archaeological resources, or non-unique archaeological resources may also be tribal cultural resources if they meet these criteria.

4.14.2 AFFECTED ENVIRONMENT

ETHNOGRAPHIC SETTING

The RLASCSP (Specific Plan) area, inclusive of the Focus Area, is located in a region traditionally occupied by the Gabrielino Indians. The term "Gabrielino" is a general term that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. Prior to European colonization, the Gabrielino occupied a diverse area that included: the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina. Their neighbors included the Chumash to the north, the Juaneño to the south, and the Serrano and Cahuilla to the east. The Gabrielino are reported to have been second only to the Chumash in terms of population size and regional influence. The Gabrielino language is part of the Takic branch of the Uto-Aztecan language family.

The Gabrielino Indians were hunter-gatherers and lived in permanent communities located near the presence of stable water and food supplies. Community populations generally ranged from 50 to 100 inhabitants, although larger settlements may have existed. The Gabrielino are estimated to have had a population numbering around 5,000 in the pre-contact period.

Villages are reported to have been the most abundant in the San Fernando Valley, the Glendale Narrows area north of downtown, and around the Los Angeles River's coastal outlets. The nearest documented villages to the Specific Plan area were Chokiishnga and Naxaaw'nga. The village of Chokiishnga was located approximately three miles northeast of the Focus Area on the plain between the San Gabriel River to the east and the confluence of the Los Angeles River and the Rio Hondo to the west. Naxaaw'nga was located

on the site of the Nieto-Carpenter adobe on the east side of the San Gabriel River near the present-day community of Los Nietos, approximately five miles northwest of the Focus Area.

Subsistence consisted of hunting, fishing, and gathering. Small terrestrial game were hunted with deadfalls, rabbit drives, and by burning undergrowth, while larger game such as deer were hunted using bows and arrows. Fish were taken by hook and line, nets, traps, spears, and poison. The primary plant resources were the acorn, gathered in the fall and processed in mortars and pestles, and various seeds that were harvested in late spring and summer and ground with manos and metates. The seeds included chia and other sages, various grasses, and islay or holly-leafed cherry.

Gabrielino society was characterized by patrilineal, non-localized clans, each clan consisting of several lineages. The Gabrielino inhabited large circular, domed houses constructed of willow poles thatched with tule. These houses could sometimes hold up to 50 people. Other village structures of varying sizes served as sweathouses, ceremonial enclosures, and granaries.

At the time of Spanish contact, many Gabrielino practiced a religion that was centered around the mythological figure Chinigchinich. This religion may have been relatively new when the Spanish arrived, and was spreading at that time to other neighboring Takic groups. The Gabrielino practiced both cremation and inhumation of their dead. A wide variety of grave offerings, such as stone tools, baskets, shell beads, projectile points, bone and shell ornaments, and otter skins, were interred with the deceased.

Coming ashore on Santa Catalina Island in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino; the 1769 expedition of Portolá also passed through Gabrielino territory. Native Americans suffered severe depopulation and their traditional culture was radically altered after Spanish contact. Nonetheless, Gabrielino descendants still reside in the greater Los Angeles and Orange County areas and maintain an active interest in their heritage.

4.14.3 REGULATORY SETTING

FEDERAL

Native American Graves Protection and Repatriation Act of 1990

The Native American Graves Protection and Repatriation Act of 1990 sets provisions for the intentional removal and inadvertent discovery of human remains and other cultural items from federal and tribal lands. It clarifies the ownership of human remains and sets forth a process for repatriation of human remains and associated funerary objects and sacred religious objects to the Native American groups claiming to be lineal descendants or culturally affiliated with the remains or objects. It requires any federally funded institution housing Native American remains or artifacts to compile an inventory of all cultural items within the museum or with its agency and to provide a summary to any Native American tribe claiming affiliation.

National Register Bulletin 38

The National Park Service has prepared guidelines to assist in the documentation of traditional cultural properties (TCPs) by public entities. While it is federal guidance, it serves as the best and most recognized guidance for identifying TCPs. National Register Bulletin 38 is intended to be an aid in determining whether properties have traditional cultural significance and if they are eligible for inclusion in the National Register of Historic Places (National Register). It is also intended to assist federal agencies,

State Historic Preservation Officers (SHPOs), Certified Local Governments, tribes, and other historic preservation practitioners who need to evaluate such properties when considering their eligibility for the National Register as part of the review process prescribed by the Advisory Council on Historic Preservation (ACHP).

American Indian Religious Freedom Act

This Act became law in 1978 (Public Law 95-341, 42 USC 1996 and 1996a) in order to protect and preserve for American Indians their inherent right of freedom to believe, express and exercise their traditional religions. These religious rights extend to, but are not limited to, access to sites, use and possession of sacred objects and the freedom to worship through ceremonial and traditional rites.

Under this regulation, federal agencies and departments are charged with evaluating their policies and procedures in consultation with native traditional religious leaders in order to eliminate interference with the free exercise of native religion. Agencies must determine and make appropriate changes necessary to protect and preserve Native American religious cultural rights and practices, and to accommodate access to and use of religious sites "to the extent that the use is practicable and not inconsistent with an agency's essential functions." The intent is to protect Native Americans' First Amendment right to "free exercise" of religion.

STATE

Senate Bill 18

Senate Bill (SB) 18 (California Government Code §65352.3) incorporates the protection of or mitigation of impacts to California traditional tribal cultural places into land use planning for cities, counties, and agencies. It establishes responsibilities for local governments to contact, refer plans to, and consult with California Native American tribes as part of the adoption or amendment of any general or specific plan proposed on or after March 1, 2005. SB 18 requires public notice to be sent to tribes listed on the NAHC's SB 18 Tribal Consultation List within the geographical areas affected by the proposed changes. Tribes must respond to a local government notice within 90 days (unless a shorter time frame has been agreed upon by the tribe), indicating whether or not they want to consult with the local government. Consultations are for the purpose of preserving or mitigating impacts to places, features, and objects described in §§5097.9 and 5097.993 of the PRC that may be affected by the proposed adoption of or amendment to a general or specific plan.

Assembly Bill 52

On September 25, Governor Brown signed Assembly Bill (AB) 52, which creates a new category of environmental resources that must be considered under CEQA: "tribal cultural resources." AB 52 is applicable to a project for which a Notice of Preparation is filed on or after July 2015.

AB 52 adds tribal cultural resources to the categories of cultural resources in CEQA, which had formerly been limited to historic, archaeological, and paleontological resources. "Tribal cultural resources" are defined as either (1) "sites, features, places cultural landscapes, sacred places and objects with cultural value to a California Native American tribe" that are included in the State register of historical resources or a local register of historical resources, or that are determined to be eligible for inclusion in the State Register; or (2) resources determined by the Lead Agency, in its discretion, to be significant based on the criteria for listing in the State register.

Recognizing that tribes may have expertise with regard to their tribal history and practices, AB 52 requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if they have requested notice of projects proposed within that area. If the tribe requests consultation within 30 days upon receipt of the notice, the Lead Agency must consult with the tribe. Consultation may include discussing the type of environmental review necessary, the significance of tribal cultural resources, the significance of the project's impacts on the tribal cultural resources, and alternatives and mitigation measures recommended by the tribe.

The parties must consult in good faith, and consultation is deemed concluded when either the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource (if such a significant effect exists) or when a party concludes that mutual agreement cannot be reached.

California Native American Graves Protection and Repatriation Act of 2001

Codified in the California Health and Safety Code (HSC) §§8010–8030, the California Native American Graves Protection and Repatriation Act (Cal NAGPRA) is consistent with the federal NAGPRA. Intended to "provide a seamless and consistent state policy to ensure that all California Indian human remains and cultural items be treated with dignity and respect," Cal NAGPRA also encourages and provides a mechanism for the return of remains and cultural items to lineal descendants. Section 8025 established a Repatriation Oversight Commission to oversee this process. The Cal NAGPRA also provides a process for non-federally recognized tribes to file claims with agencies and museums for repatriation of human remains and cultural items.

Native American Heritage Commission

PRC §5097.91 established the Native American Heritage Commission (NAHC), whose duties include the inventory of places of religious or social significance to Native Americans and the identification of known graves and cemeteries of Native Americans on private lands. Under PRC §5097.9, a state policy of noninterference with the free expression or exercise of Native American religion was articulated along with a prohibition of severe or irreparable damage to Native American sanctified cemeteries, places of worship, religious or ceremonial sites, or sacred shrines located on public property. PRC §5097.98 specifies a protocol to be followed when the NAHC receives notification of a discovery of Native American human remains from a county coroner. Section 5097.5 defines as a misdemeanor the unauthorized disturbance or removal of archaeological, historic, or paleontological resources located on public lands.

Public Resources Code §5097.5

California PRC §5097.5 prohibits excavation or removal of any "vertebrate paleontological site…or any other archaeological, paleontological or historical feature, situated on public lands, except with express permission of the public agency having jurisdiction over such lands." Public lands are defined to include lands owned by or under the jurisdiction of the state or any city, county, district, authority or public corporation, or any agency thereof. Section 5097.5 states that any unauthorized disturbance or removal of archaeological, historical, or paleontological materials or sites located on public lands is a misdemeanor.

Health and Safety Code §§7050 and 7052

HSC §7050.5 declares that, in the event of the discovery of human remains outside a dedicated cemetery, all ground disturbance must cease and the county coroner must be notified. Section 7052 establishes a felony penalty for mutilating, disinterring, or otherwise disturbing human remains, except by relatives.

California Government Codes Addressing Native American Heritage

Government Code (GC) §6254(r) exempts from disclosure public records of Native American graves, cemeteries and sacred places maintained by the NAHC. Pursuant to SB 18, GC §65351 specifies how local planning agencies should provide opportunities for involvement of California Native American tribes to consult on the preparation or amendment of general plans. In particular, GC §65352 requires local planning agencies to refer proposed actions of general plan adoption or amendment to California Native American tribes on the contact list maintained by the NAHC and others, with a 45-day opportunity for comments.

Regarding historical properties, GC §25373 and §37361 allows city and county legislative bodies to acquire property for the preservation or development of a historical landmark. It also allows local legislative bodies to enact ordinances to provide special conditions or regulations for the protection or enhancement of places or objects of special historical or aesthetic interest or values.

4.14.4 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G includes questions concerning tribal cultural resources. The questions presented in the Initial Study Checklist have been used as significance criteria. Accordingly, the Project would have a significant effect on the environment if it would:

- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC §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:
    - Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC §5020.1(k), or
    - 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 PRC §5024.1. In applying the criteria set forth in subdivision (c) of PRC §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

According to the PRC §21084.2, a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. While what constitutes a "substantial adverse change" to a tribal cultural resource is not defined in the section, guidance on what constitutes a substantial adverse change under CEQA can be drawn from State CEQA Guidelines §15064.5(b). Although applicable specifically to historical resources (as defined in §15064.5(a)), an analogy can be drawn when assessing if there has been a substantial adverse change to a tribal cultural resource. State CEQA Guidelines §15064.5(b)(1) defines a substantial adverse change as the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings, resulting in material impairment of the historical resource. According to State

CEQA Guidelines §15064.5(b)(2), the significance of a historical resource is materially impaired when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to §5020.1(k) of the PRC or its identification in a historical resources survey meeting the requirements of §5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

In drawing an analogy, a substantial adverse change to a tribal cultural resource could be considered to be the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings, resulting in material impairment of the tribal cultural resource. Similarly, material impairment could include:

- Demolition or material alteration in an adverse manner those characteristics of a tribal cultural resource that justify its eligibility for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC §5020.1(k); or
- Demolition of material alteration in an adverse manner those characteristics of a tribal cultural resource that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

PRC §21084.3 provides guidance on addressing impacts to tribal cultural resources and states that:

- Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.
- If the lead agency determines that a project may cause a substantial adverse change to a tribal cultural resource, and measures are not otherwise identified in the consultation process provided in §21080.3.2, the following are examples of mitigation measures that, if feasible, may be considered to avoid or minimize the significant adverse impacts:
    - Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
    - Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
        - Protecting the cultural character and integrity of the resource.
        - Protecting the traditional use of the resource.
        - Protecting the confidentiality of the resource

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

State CEQA Guidelines §15370 provides additional guidance on the types of mitigation that may be considered, and includes: avoiding impacts altogether; minimizing impacts; rectifying impacts through repair, rehabilitation, or restoration; reducing impacts through preservation; and compensating for impacts by providing substitute resources.

PRC §21082.3(b) indicates that if a project may have a significant impact on a tribal cultural resource, the agency's environmental document shall discuss whether the proposed project has a significant impact on an identified tribal cultural resource and whether feasible alternatives or mitigation measures avoid or substantially less the impact on the identified tribal cultural resource.

PRC §21080.3.2 indicates that as part of the consultation pursuant to §21080.3.1, California Native American Tribes may propose mitigation measures, including, but not limited to, those recommended in §21084.3, capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource. Also, the lead agency may incorporate changes or additions to a project even if not legally required to do so.

METHODOLOGY AND ASSUMPTIONS

Native American Heritage Commission Sacred Lands File. A Sacred Lands File (SLF) search for the County project was requested from the NAHC on June 15, 2017. The results provided by the NAHC (Appendix I of the County project EIR), on June 21, 2017 indicated that the SLF search yielded negative results.

Native American Consultation. The City requested a Native American Contacts List from NAHC on March 20, 2019 in conformance with SB 18 and AB 52. A reply letter was received on April 5, 2019 with recommendations for consultation with California Native American tribes as well as recommended requirements for consolation during the environmental review process.

Based on the information received from the NAHC, the City provided formal notification pursuant to SB 18 on April 9, 2019 and AB 52 on June 11, 2019. Correspondence was sent to the designated contact/tribal representative for the following tribes:

- Gabrieleno Band of Mission Indians – Kizh Nation
- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrieleno/Tongva Nation
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino-Tongva Tribe
- Soboba Band of Luiseno Indians

Pursuant to SB 18 and AB 52, tribes must respond in writing and request consultation within 90-days and 30-days, respectively, of receipt of the formal notification from the City. Refer to Appendix C for copies of the correspondence.

On June 17, 2019, the City received one request for consultation from the Gabrieleno Band of Mission Indians-Kizh Nation (Kizh Nation). The City replied to the representative via email initiating formal government-to-government consultation with the Kizh Nation and a formal consultation meeting was held on January 15, 2020.

4.14.5 IMPACTS AND MITIGATION MEASURES

Impact 4.14-1: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, 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 with Mitigation. As discussed under **Section 4.3: Cultural Resources**, no tribal cultural resources were identified in the records search of a 0.5-mile radius of the South Campus conducted for the County EIR. Additionally, the SLF records search did not identify any sacred lands or sites. Notwithstanding, the Focus Area is considered to have a high sensitivity for presence of buried tribal cultural resources due to its historic proximity to perennial sources of water including to the confluence of the Los Angeles River and the Rio Hondo; depositional processes given the proximity to the rivers; and the proximity to documented Gabrielino villages and their associated territories.

During tribal consultation with the Kizh Nation, tribal representatives expressed concerns regarding subsurface activities associated with future development within the Focus Area. The Kizh Nation provided their knowledge of the Project area, including information about the natural environment and the area's general history, and known villages and trade routes in the larger area. During the consultation call and in subsequent email communication, the Kizh Nation indicated that the Focus Area has a high sensitivity for the presence of unknown, subsurface archaeological resources. The Kizh Nation provided tribal archive information to the City to identify high cultural sensitivity of the Project location and why they have concerns for subsurface ground disturbance activities that may impact tribal cultural resources.

While the Project does not propose any development or ground-disturbing activities such as grading or excavation, it can be assumed that future development within the Focus Area facilitated by the RLASCSP could directly or indirectly impact undiscovered subsurface tribal cultural resource. The likelihood of encountering tribal cultural resources on undeveloped sites is greatest on sites that have been minimally excavated in the past (e.g., undeveloped parcels). Alternately, previously excavated areas are generally considered to have a lower potential for tribal cultural resources, since the previously graded areas may have already removed or disturbed the soil that may have previously contained resources. Future

development within the Focus Area would be subject to discretionary permits and CEQA evaluation and would be required to adhere to all federal, state, and local requirements for avoiding impacts to tribal cultural resources.

Further, the Project would incorporate mitigation measures recommended by the Kizh Nation concerning potential impacts to as-yet undiscovered tribal cultural resources. The mitigation measures include requirements for procedures in the event of an unanticipated discovery of tribal cultural and archaeological resources (**MM TCR-1**), retaining a Native American Monitor/Consultant (**MM TCR-2**), construction worker cultural resources sensitivity training (**MM CR-7**), cultural resources monitoring program (**MM CR-8**), archeological monitoring (**MM CR-9**), and unanticipated discovery of human remains (**MM CR-10**). Following compliance with **MM TCR-1** and **MM TC-2**, in addition to **MM CR-7** through **MM CR-10**, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource. With mitigation, impacts would be less than significant.

Mitigation Measures

MM TCR-1 **Inadvertent Discovery of Archaeological Resources.** In the event that archaeological resources are encountered during ground-disturbing activities, all activity within a 100-foot radius of the find shall cease and the CRMP protocols and procedures for discoveries shall be implemented (see **MM CR-8**). The Qualified Archaeologist shall evaluate the discovery for potential significance. If the Qualified Archaeologist determines that the resource may be significant (i.e., meets the definition for historical resource in CEQA Guidelines §15064.5(a) or unique archaeological resource in PRC §21083.2(g)), the Qualified Archaeologist shall develop an appropriate treatment plan for the resource in accordance with the CRMP. When assessing significance and developing treatment for resources that are Native American in origin, the Qualified Archaeologist and the City shall consult with the appropriate Native American representatives. The Qualified Archaeologist shall also determine if work may proceed in other parts of the Project Site while treatment for cultural resources is being carried out.

MM TCR-2 **Native American Monitoring.** In the event the Qualified Archaeologist determines that an archaeological discovery is Native American in origin, the Applicant or their designee shall retain a qualified Native American monitor to provide monitoring during testing and data recovery efforts of the discovered resource in accordance with CRMP protocols and procedures (see **MM CR-8**). The Native American monitor shall be selected from a Tribe that is culturally and geographically affiliated with the Specific Plan area (according to this Project's NAHC contact list). In the event of a discovery, the City shall also determine if Native American monitoring of any future ground-disturbing activities is warranted.

4.14.6 CUMULATIVE IMPACTS

With respect to Native American tribal resources, the cumulative study area would include the inland areas historically used by the Gabrielinos. Projects in the cumulative study area include the West Santa Ana Branch Transit Corridor; the Rancho Los Amigos North Campus improvements; the Rancho Los Amigos South Campus Sports Center Project; and ongoing and planned office, residential, and commercial projects within the cities of Downey and Paramount. Although the Project—in conjunction with the effects of past projects, other current projects, and probable future projects—could result in the disturbance of

tribal cultural resources throughout the cumulative study area, standard conditions of approval and mitigation measures required for each project can reduce the impacts to less than significant levels. Despite the site-specific nature of the resources, mitigation required for the identification and protection of unknown or undocumented resources would reduce the potential for cumulative impacts. As a result, development of the proposed Project would not contribute to a significant cumulative impact on tribal cultural resources.

4.14.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable Native American tribal cultural resource impacts have been identified.

4.14.8 REFERENCES

ESA. June 2020. Rancho Los Amigos South Campus Project Final EIR, SCH No. 2017081017.

ESA. 2018. *Rancho Los Amigos South Campus, County of Los Angeles, City of Downey, California – Historic Resources Analysis Report.*

4.15 UTILITIES AND SERVICE SYSTEMS

4.15.1 INTRODUCTION

This section analyzes the effects of the Rancho Los Amigos South Campus Specific Plan (RLASCSP) Project's impacts related to utilities and service systems. It is based off information provided in the City of Downey General Plan Vision 2025 (DGP and DGP EIR), 2015 Urban Water Management Plan, and County of Los Angeles Rancho Los Amigos South Campus Project EIR (County Project EIR) Section 3.13: Utilities and Service Systems. The analysis conducted for the County Project EIR is representative of general site conditions throughout the South Campus. That EIR and the detailed studies therein adequately address the potentially occurring and present utilities and service systems within the RLASCSP area.

4.15.2 AFFECTED ENVIRONMENTS

Electrical and natural gas are addressed in **Section 4.5: Energy**. Stormwater drainage is addressed in more detail in **Section 4.9: Hydrology and Water Quality**.

STORMWATER DRAINAGE

The stormwater management system in the RLASCSP area, inclusive of the Focus Area is largely characterized by overland surface flows into gutters and catch basins in on-site roadways, which in turn direct flows into an underground network of storm drains. There is no active stormwater detention or treatment currently undertaken in the Focus Area.

The storm drain system discharges to three main points throughout the Focus Area. The western portion of the Focus Area discharges to a point just southwest of the intersection of Laurel Street at Aliso Street, into a Los Angeles County Flood Control District trunk line known as Hollydale Line A (KPFF Consulting Engineers, 2014; County of Los Angeles Department of Public Works, 2017). A majority of the eastern portion of the Focus Area discharges to a 12-inch vitrified clay pipe (VCP) that begins at the intersection of Consuelo Street at Bonito Street. This VCP discharges into another 12-inch VCP on Gardendale Street, which is ultimately conveyed into Hollydale Line A. The central-southern portion of the Focus Area discharges overland via surface flow south to a point near the intersection of Gardendale Street at Erickson Avenue. Drainage is then conveyed off of the site into the Los Angeles County storm drain system from gutters at Gardendale Street.

WASTEWATER

The Specific Plan area, inclusive of the Focus Area is served by the City of Downey Public Works Department – Utilities Division's sewer system. The City has a sewer system that is composed of approximately 200 miles of sewer collection mains, 4,300 manholes, 2 lift stations, and other associated facilities. Los Angeles County Sanitation District (LACSD) provides wastewater conveyance with approximately 27 miles of trunk sewers, and also provides wastewater treatment services to the City. Additionally, the City owns and maintains collection mains on the streets adjacent to the RLASCSP area.

Although the Focus Area contains an extensive network of existing sewer lines, they are largely non-operational because of the limited active land uses on the Focus Area. Sewer lines generally flow west/southwest. Sewer lines east of Erickson Avenue flow west/southwest until reaching Erickson Avenue. These sewer lines east of Erickson Avenue include sewer lines along Golondrinas Street and sewer

lines that run parallel to Flores Street, on the east side of Erickson Avenue. Sewer lines along Erickson Avenue flow in two different directions. North of Descanso Street, sewer lines along Erickson Avenue flow south until reaching Descanso Street. South of Descanso Street, sewer lines along Erickson Avenue flow north until reaching Descanso Street. The sewer line along Laurel Street flows south, and converges with another line to ultimately convey wastewater outside the Specific Plan area. Flows from Erickson Avenue generally flow to five main lines before ultimately being conveyed outside the Specific Plan area. The sewer line along Flores Street runs east-west but ultimately conveys to the south, reaching the sewer system on Esperanza Street and Hawthorne Avenue. Sewer lines along Esperanza run east-west and convey in the same direction, intersecting with Hawthorne Avenue. The sewer system along Hawthorne Avenue flows south until reaching Descanso Street. Sewer conveyance along Descanso Street flows west until reaching a conveyance line that runs southwest, intersecting with the Laurel Avenue sewer line, and ultimately being conveyed outside the Specific Plan area. All wastewater conveyed outside the Specific Plan area is connected to a LACSD trunk sewer line southwest of the Focus Area. There are several smaller sewer lines throughout the Focus Area that connect building sewer systems to the larger conveyance lines previously described.

In addition to providing wastewater conveyance services, LACSD also provides wastewater treatment services for the City. Wastewater is conveyed to the Joint Water Pollution Control Plant. The Joint Water Pollution Control Plant (JWPCP) is located at 24501 S. Figueroa Street in the City of Carson. The JWPCP treats approximately 260 million gallons of wastewater per day (mgd). The JWPCP has a maximum permitted dry-weather capacity of 400 mgd and a wet weather maximum capacity of 675 mgd.

WATER SUPPLY

The City of Downey is a water retailer and provides water supply for domestic, irrigation and fire protection use. The water service area is approximately 12.3 square miles and covers approximately 98 percent of the land within the City's municipal boundaries. The remaining portions of the City, including the area that lies east of the San Gabriel River, south of the I-5, and north of Cecilia Avenue, are currently served by other water purveyors.

The City provides water service to an area with a current population of approximately 112,400. The City's 2015 Urban Water Management Plan (UWMP) projected population of approximately 127,300 by 2040. Projected populations in the City's service area were based on projections obtained from the Southern California Association of Governments (SCAG). The SCAG data incorporates demographic trends, existing land use, general plan land use policies, and input and projections from the Department of Finance (DOF) and the U.S. Census Bureau.

In 2015, the City's Water demand was 15,030 acre-feet per year (AFY), of which 10,800 AFY was used by residential uses. The 2015 UWMP projected water use estimates a total demand of approximately 19,529 AFY by 2040, representing an increase of 29 percent. Primary demand would continue to occur from residential uses throughout the City. Accordingly, necessary improvements to water conveyance infrastructure would be planned through Capital Improvement Programs and development fees.

The City's water supply sources include groundwater pumped from the local Central Basin, supplemental imported water that can be purchased from Central Basin Municipal Water District (CBMWD) for emergencies in the event that system demands exceed the production capacity of the City's groundwater wells, and recycled water supplies provided by CBMWD. The City pumps groundwater from Central Basin

through its 20 active wells and has an Allowed Pumping Allocation of 16,553 AFY. The City's wells have a combined pumping capacity of approximately 27,575 gpm, or approximately 44,500 AFY if operated continuously.

Based on current groundwater management practices in the Central Basin, the reliability of supplemental water purchased from CBMWD for emergency use, and water conservation efforts from customers, dry year or multiple dry year scenarios do not compromise the City's ability to provide a reliable supply of water to its customers. Additionally, recycled water facilities would be expanded through the planning horizon to meet demands for non-potable water.

SOLID WASTE

CalMet Services is the City's franchised solid waste collector. Solid waste from the Focus Area would be collected and brought to the Downey Area Recycling and Transfer (DART) Facility in Downey. Non-recyclables and residual waste would primarily be trucked to the Frank R. Bowerman Sanitary Landfill (Bowerman Landfill) in Orange County, northeast of the City of Irvine. Residual waste from the City would be brought to the Bowerman Landfill, and smaller volumes of solid waste would be disposed of at the El Sobrante Landfill in the City of Corona and the Olinda Landfill in the City of Brea. In 2016, 67,716 tons of solid waste from Downey was sent to the Bowerman Landfill, which accounted for 11 percent of the total waste received at this landfill. The Bowerman Landfill receives an annual tonnage of 2,142,000 with an average of 6,865 tons per day (tpd). The permitted daily disposal at the Bowerman Landfill is 11,500 tpd, which has a remaining capacity of 106.8 million tons and a remaining lifespan of 32 years.

TELECOMMUNICATIONS

Given the dilapidated condition of many of the existing structures and infrastructure, it is assumed that none of the on-site telecommunications infrastructure can or would be reused. The proposed Project would remove all existing on-site telecommunications infrastructure and replace the telecommunications infrastructure with modern systems.

4.15.3 REGULATORY SETTING

FEDERAL

Clean Water Act

The Clean Water Act (33 United States Code §1251 et seq.) is the cornerstone of water quality protection in the United States. The statute employs a variety of regulatory and non-regulatory tools to sharply reduce direct pollutants discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted run-off. These tools are employed to achieve the broader goal of restoring and maintaining the chemical, physical, and biological integrity of the nation's waters so that they can support "the protection and propagation of fish, shellfish, and wildlife and recreation in and on the water."

Federal Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) was originally passed by Congress in 1974 to protect public health by regulating the nation's public drinking water supply. The law was amended in 1986 and 1996, and requires many actions to protect drinking water and its sources: rivers, lakes, reservoirs, springs, and ground water wells. The SDWA applies to every public water system in the United States. The SDWA authorizes the U.S. Environmental Protection Agency (U.S. EPA) to set national health-based standards

for drinking water to protect against both naturally-occurring and man-made contaminants that may be found in drinking water. The U.S. EPA, states, and water systems work together to make sure that these standards are met.

Originally, the SDWA focused primarily on treatment as the means of providing safe drinking water at the tap. The 1996 amendments greatly enhanced the existing law by recognizing source water protection, operator training, funding for water system improvements, and public information as important components of safe drinking water. This approach ensures the quality of drinking water by protecting it from source to tap.

Resource Conservation and Recovery Act of 1976

The Resource Conservation and Recovery Act of 1976 (RCRA) (Title 40 of the Code of Federal Regulations), Part 258, contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria. The federal regulations address the location, operation, design (liners, leachate collection, run-off control, etc.), groundwater monitoring, and closure of landfills.

Federal Energy Regulatory Commission

The Federal Energy Regulatory Commission duties include the regulation of the transmission and sale of electricity and natural gas in interstate commerce, licensing of hydroelectric projects, and oversight of related environmental matters. The Federal Energy Regulatory Commission is an independent agency that regulates the transmission and sale of electricity, natural gas, and oil; licenses and inspects hydropower projects; reviews proposals to build liquefied natural gas terminals; and oversees related environmental matters.

STATE

California Urban Water Management Planning Act

The Urban Water Management Planning Act of 1983 (California Water Code §§10610 et seq.) requires urban water suppliers to develop urban water management plans (UWMPs). While generally aimed at encouraging water suppliers to implement water conservation measures, it also creates long-term planning obligations to meet existing and future needs. In accordance with the CWC, urban water suppliers with 3,000 or more service connections or supplying 3,000 acre-feet (AF) or more of water per year are required to assess the reliability of its water sources over a 20-year planning horizon and to update the data in the urban water plans every 5 years.

Water Conservation Act (SB X7-7)

The Water Conservation Act of 2009 (SB X7-7, Steinberg), enacted in November 2009, includes distinct requirements related to both urban and agricultural water use. This law requires that California reduce urban per-capita water use statewide by 10 percent by the end of 2015 and 20 percent by the end of 2020. DWR is required to report on progress toward meeting these urban per-capita water use goals. In addition, agricultural water suppliers must adopt agricultural water management plans by the end of 2012 and then update the plans by the end of 2015 and every five years thereafter. Through its Agricultural Water Management Planning and Implementation Program, the DWR helps water districts develop agricultural water management plans and implement cost-effective, efficient water management practices.

Sustainable Groundwater Management Act

The California Department of Water Resources' (DWR's) 2014 Sustainable Groundwater Management Act (SGMA) requires local public agencies and Groundwater Sustainability Agencies (GSAs) in "high" and "medium" priority basins to develop and implement Groundwater Sustainability Plans (GSPs) or Alternatives to GSPs (DWR, 2019). The DWR categorizes the priority of groundwater basins. GSPs are detailed road maps for how groundwater basins will reach long term sustainability. SGMA §10720.8(a) exempts adjudicated basins from the SGMA's requirement to prepare a GSP.

AB 939 and SB 1016—California Integrated Waste Management Act and Per Capita Disposal Measurement System

In 1989, the legislature adopted the California Integrated Waste Management Act of 1989. The Act requires every city and county in the state to prepare a source reduction and recycling element in addition to a solid waste management plan to identify how the jurisdiction would meet mandatory goals of 50 percent solid waste diversion by the year 2000 and 75 percent solid waste diversion by 2010. The Act also established the framework for state inspection and enforcement of solid waste facilities and regulates safe transportation and disposal of solid waste. Projects that would have an adverse effect on waste diversion goals are required to include waste diversion mitigation measures to assist in reducing these impacts to less-than-significant levels. With the passage of SB 1016 (the Per Capita Disposal Measurement System) in 2006, only per capita disposal rates are measured to determine if a jurisdiction's efforts are meeting the intent of AB 939.

CalRecycle

This is the term the State of California uses for its Department of Resources Recycling and Recovery, formerly known as the California Integrated Waste Management Board. This state agency performs a variety of regulatory functions pursuant to CCR Title 27 and other regulations. Among other things, CalRecycle set minimum standards for the handling and disposal of solid waste designed to protect public health and safety, as well as the environment (see CCR §20050, for example). It is also the lead agency for implementing the State of California municipal solid waste program deemed adequate by the U.S. EPA for compliance with RCRA.

Mandatory Diversion and Recycling, AB 341

Approved in 2011, this Act amended the California Public Resources Code (PRC) (§42649 et seq.) to address solid waste diversion (i.e., recycling) targets to decrease the amount of wastes going to landfills and thus extend their usable lives. AB 341 requires cities and counties, including Los Angeles County, to include source reduction, recycling and composting in their integrated waste management plans (IWMP). In addition, under AB 341 counties were required to "divert 50% of all solid waste from landfill disposal or transformation [e.g., incineration] by January 1, 2000, through source reduction, recycling and composting activities." By 2020, the target rises to "not less than 75% of solid waste." The Act also requires the City to implement a commercial solid waste recycling program meeting specific elements outlined in the law. It sets new commercial solid waste recycling requirements. And, it also required "commercial or public entities" that "generate more than 4 cubic yards of commercial solid waste per week" and "multifamily residential dwelling[s] of five units or more" to source separate recyclable materials and arrange for recycling services starting July 1, 2012.

California Public Utilities Commission

Established in 1911, the California Public Utilities Commission (CPUC) regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies. The commission is organized into several advisory units, an enforcement division, and a strategic planning group. Both SCE and Southern California Gas Company (SoCalGas) are regulated by the CPUC.

The CPUC regulates privately-owned (i.e., investor-owned) electric power and natural gas utility companies in the State of California, as well as telecommunications, water, railroad, rail transit and passenger transportation utilities. AB 1890, enacted in 1996, deregulated the power generation industry, allowing customers to purchase electricity on the open market. Under deregulation, the production and distribution of power that was under the control of investor-owned utilities (e.g., Southern California Edison) was decoupled. For these utilities, the CPUC regulates the design, installation and management of California's public electric, natural gas, water, transportation, and telecommunications. The CPUC also provides consumer programs and information, such as energy efficiency, low-income programs, demand response and California solar initiative for California's energy consumers.

California Energy Commission

The CEC was created in 1974 as the state's principal energy planning organization to meet the energy challenges facing the state in response to the 1973 oil embargo. The CEC is charged with six basic responsibilities when designing state energy policy:

- Forecast statewide electricity needs
- License power plants to meet those needs
- Promote energy conservation and efficiency measures
- Develop renewable energy resources and alternative energy technologies
- Promote research, development, and demonstration
- Plan for and direct the state's response to energy emergencies

California Code of Regulations Title 24

California Building Standards Title 24 contains the energy efficiency standards related to residential and nonresidential buildings. Title 24 standards are based, in part, on a state mandate to reduce California's energy demand. These are prescriptive standards that establish maximum energy consumption levels for the heating and cooling of new buildings. The use of alternative energy applications in development projects, while encouraged, is not required as a development condition. Such applications may include installation of photovoltaic solar panels, active solar water heating systems, or integrated pool deck water heating systems, all of which serve to displace consumption of conventional energy sources. Incentives are primarily state and federal tax credits, as well as reduced energy bills. The Subdivision Map Act requires subdivisions of five or more lots, other than condominium conversions, to provide for, to the extent feasible, future passive or natural heating or cooling opportunities in the subdivision. A new development project is required to incorporate the most recent Title 24 standards in effect at the time a

building permit application is submitted.[1] The 2020 standards went into effect on January 1, 2021. California's energy efficiency standards are updated on an approximate three-year cycle.

Senate Bill 1078

California's Renewables Portfolio Standard (RPS) was established in 2002 by Senate Bill 1078. It requires the state's retail sellers of electricity (investor-owned utilities, electric service providers and community choice aggregators) to procure at least 20 percent of their retail electricity sales from eligible sources of renewable energy by 2017. California's energy agencies subsequently committed to achieving the 20 percent target by 2010, seven years earlier than the original target. This 20 percent target was codified in 2006 by the enactment of SB 107, which took effect on January 1, 2007. A higher, more ambitious goal of 33 percent renewables by 2017 was initially set by the CEC and CPUC in their joint "Energy Action Plan." However, former Governor Schwarzenegger's November 2008 Executive Order No. S-14-01 set the goal at 33 percent by 2020. In creating the RPS, the legislature underscored the importance of increasing the diversity, reliability, public health, and environmental benefits of the energy mix.

Appendix F to the State CEQA Guidelines

Pursuant to PRC §21100(b)(3), an EIR must include a "discussion of the potential energy impacts of proposed projects." State CEQA Guidelines Appendix F lists environmental impacts and mitigation measures that an EIR may include. What is required is a "discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy (see PRC §21100(b)(3))." Potential impacts that may be discussed include:

- A project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.
- The effects of a project on local and regional energy supplies and on requirements for additional capacity.
- The effects of a project on peak and base period demands for electricity and other forms of energy.
- The degree to which a project complies with existing energy standards.
- The effects of a project on energy resources.
- A project's forecasted transportation energy use requirements and its overall use of efficient transportation alternatives.

Porter-Cologne Water Quality Control Act

In California, State Water Resources Control Board (SWRCB) is responsible for ensuring the highest reasonable quality of waters of the State, while allocating those waters to achieve the optimum balance of beneficial uses. The 1969 Porter-Cologne Water Quality Control Act, codified in the California Water Code, authorizes the SWRCB to implement programs to control polluted discharges into state waters. This law essentially implements the requirements of the CWA. Pursuant to this law, the local Regional Water Quality Control Board (RWQCB) is required to establish the wastewater concentrations of a number of

[1] Please also refer to Section 4.6, Greenhouse Gas Emissions.

specific hazardous substances in treated wastewater discharge. The Los Angeles RWQCB regulates wastewater discharges and water quality in the southern/coastal portions of Los Angeles County, including the Focus Area.

On May 2, 2006, the SWRCB adopted Statewide General Waste Discharge Requirements (WDRs) and a Monitoring and Reporting Program for sanitary sewer systems. The regulations were in response to growing public concern about the water quality impacts of sanitary sewer overflows, particularly those that cause beach closures, adversely affect other bodies of water, or pose serious health and safety or nuisance problems.

LOCAL AND REGIONAL

Central Basin Municipal Water District 2015 Urban Water Management Plan

California Water Code §§10610 through 10656 requires every urban water supplier to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually to prepare, adopt, and file an Urban Water Management Plan. As discussed in the 2015 UWMP, the Gateway Regional Alliance is a group of twelve participating water retailers, including the City of Downey, that formed to develop a regional plan to achieve SBx7-7 water use reduction requirements, which are discussed above.

City of Downey 2015 Urban Water Management Plan

In adherence to the California Urban Water Management Planning Act (CWC Division 6, Part 2.6, §§10610-10656), the City of Downey prepared the 2015 UWMP (adopted in February 2018). The purpose of a UWMP is for urban water suppliers, such as the City, to evaluate the reliability of its water sources over a 20-year planning period to ensure adequate water supplies are available. According to the UWMP, the City purchases recycled water from CBMWD and re-sells it at a discounted rate to water users in the City. CBMWD water can also be purchased by the City for emergencies in the event that water system demands exceed production capacity of the City's wells. According to the table titled "Historical Water Production (A.F.)" on page 6-1 of the 2015 UWMP, recycled water makes up approximately 4.6 percent of the City's overall water demand.

4.15.4 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G contains the Initial Study Checklist, which includes questions concerning utilities. The questions presented in the Initial Study Checklist have been used as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

- Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects.
- Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.
- Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

- 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.
- Conflict with federal, state, and local management and reduction statutes and regulations related to solid waste.

METHODOLOGY AND ASSUMPTIONS

The water supply analysis is based on the regional UWMP completed by the CBMWD, the local 2015 UWMP completed by the City of Downey, and a WSA by Todd Groundwater. The wastewater capacity analysis is based on analyzing the receiving facility's capacity to receive wastewater from the proposed Project. The solid waste analysis is based on an estimated waste stream analysis from demolition, construction, and operation of the proposed Project, adherence to applicable regulations, and the remaining capacity at solid waste receiving facilities.

As previously discussed, the Focus Area is largely non-operational. Therefore, it is conservatively assumed that there is no existing wastewater, water, and solid waste. Any wastewater, water, and solid waste demand is assumed to be new to the Focus Area.

4.15.5 IMPACTS AND MITIGATION

Impact 4.15-1: 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?

WATER

Less than Significant. The City of Downey Water Department provides water resources to the Specific Plan area, inclusive of the Focus Area. The Project does not propose direct development that would result in an increased demand for water resources. However, future development facilitated by the Project would require connections to the City's existing water infrastructure. Existing water facilities within the Focus Area are largely deteriorated and would require replacement and upgrade to serve future development on the Focus Area. Water service for the new construction east of Erickson Street would connect to the water main on Erickson Avenue or Consuelo Street. Water service west of Erickson Street would connect to the water main on Descanso Street. All lines would be connected to the City's water lines to provide a public combined water system.

As discussed in **Section 4.11: Population and Housing,** the Project would have a residential buildout capacity of 700 dwelling units (D.U.s), resulting in a maximum population increase of 2,324 persons or approximately 2.1 percent over existing conditions. Additionally, the Project would allow for 1,130,000 square feet (S.F.) of new non-residential uses in the Focus area. Growth associated with Project implementation would be consistent with SCAG and DGP growth forecasts which serve as the basis for the City's UWMP. Therefore, Project implementation would not result in unplanned demand on the Water system.

Additionally, future development would be required to construct infrastructure and pipelines that are adequately sized to accommodate project-related demand. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required

to demonstrate consistency with DGP policies and DMC requirements, including those concerning water use and management. Where potentially significant adverse impacts are identified, the City shall require appropriate mitigation measures such as payment of impact fees. A less than significant impact would occur and no mitigation is required.

WASTEWATER

Less than Significant. Sanitary sewer service to the RLASCSP area is provided by the City of Downey Public Works Department - Utilities Division. The Project does not propose direct development that would result in an increased demand for wastewater treatment facilities. However, future development facilitated by the Project would require connections to the existing conveyance system and treatment at the JWPCP. The JWPCP has a dry weather capacity of 400 mgd and a wet weather maximum capacity of 675 mgd. The JWPCP currently processes an average flow of 260 mgd and has the capacity to treat up to 675 mgd of primary, secondary, and tertiary wastewater.

The Specific Plan area, inclusive of the Focus Area is located in an urbanized area and would not require or result in the relocation or construction of new or expanded wastewater facilities that could result in environmental effects. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including wastewater conveyance and treatment. Where potentially significant adverse impacts are identified, the City shall require appropriate mitigation measures such as payment of impact fees. A less than significant impact would occur and no mitigation is required.

STORMWATER DRAINAGE

Less than Significant. Storm drainage facilities within the RLASCSP area are owned and maintained by the Los Angeles County Flood Control District (LACFCD) and the Los Angeles County Public Works Department. The Focus Area is located in an urbanized area of the City and is currently characterized primarily by impervious surfaces and remnants of past development. As described in **Section 3.8, Hydrology and Water Quality**, future development facilitated by the Project would be required to minimize stormwater run-off and promote infiltration and on-site treatment. Therefore, future development would not be expected to increase the rate of storm water run-off or exacerbate the peak discharge rate from the proposed Focus Area. Proper design of landscape features and site grading, as well as implementation of BMPs, would have the potential to improve the quality of storm water run-off from the proposed Focus Area.

As noted, all future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including DMC §57: Stormwater and Urban Runoff Pollution and Conveyance Controls. Where potentially significant adverse impacts are identified concerning stormwater drainage, the City shall require appropriate development conditions such as implementation of BMPs. A less than significant impact would occur and no mitigation is required. Final design criteria and specifications for all stormwater drainage facilities would comply with all applicable City, regional and RWQCB requirements and policies, and would be subject to review and approval by the RWQCB. Following compliance with the established regulatory framework, a less than significant impact would occur and no mitigation is required.

TELECOMMUNICATIONS

Less than Significant. The Focus Area is located in a developed area of the City that is served by existing telecommunications facilities. The proposed Project does not include direct development that would require new or expanded telecommunications facilities, but would facilitate future development requiring service connections. While future development facilitated by the proposed Project would increase population within the City and increase service demand, growth projections are consistent with regional and local plans used to guide infrastructure development.

All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including DMC §9526: Public Utilities. All future development facilitated by the Project would be required to meet the mandatory requirements under the City's various programs aimed at ensuring adequate service infrastructure are available to serve the development. Considering these requirements, impacts would be less than significant and no mitigation is required.

ELECTRIC POWER AND NATURAL GAS

See **Section 4.5: Energy** for a discussion of electric power and natural gas impacts.

Mitigation Measures

No mitigation is required.

Impact 4.15-2: 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. The Project would not result in direct development that would increase water demand, but would facilitate development of up to 700 DU and 1,130,00 SF of non-residential uses. Future development facilitated by the Project would generate a demand for water services.

As discussed above, the Focus Area is located within the City of Downey Water District service area, which obtains its potable water supply from groundwater pumped from the Central Basin. The District's 2015 Final Urban Water Management Plan (UWMP) was prepared in compliance with the requirements of Water Code §§10610 through 10656 of the Urban Water Management Planning Act.

To prepare its UWMP, the District used population projections based on SCAG's Regional Growth Forecast. As documented in the UWMP, the City has sufficient water supply to accommodate the Project for normal year, single dry year, and multiple dry year conditions through 2040. Therefore, the City has sufficient water supply for existing water demands and projected water demands, including the demand of the proposed Project. Projected water demands may be less than projected with implementation of ongoing conservation measures. Additionally, the City, County, and CBMWD are working together to extend the recycled water conveyance system to this part of the City. Infrastructure to support the delivery of this future recycled water would be considered as future development is proposed.

All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements related to water management during construction and operations, including DMC §73:

Water Diversion Rates and Regulations and DMC §73.5: Water Conservation Regulations and Restrictions. Considering these requirements, the proposed Project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. Therefore, impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.15-3: 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?

The sanitary sewer system within the RLASCSP is a combination of trunk sewer lines owned and maintained by LASD and collection mains owned and maintained by the Los Angeles County Public Works. Additionally, the City owns and maintains collection mains on the streets adjacent to the RLASCSP area.

Future development facilitated by the proposed Project would result in increased demand for wastewater treatment services. The City levies connection fees for new or expanded sewer connections, including those to new development. These connection fees help fund the costs associated with providing wastewater facility capacity to both new users requiring new connections, as well as existing users requiring additional capacity. All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements related to wastewater treatment during construction and operations, including DMC §722: Sanitary Sewers and Industrial Waste and the Construction General Permit. Considering these requirements, and the available capacity discussed above, the project would not result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments. Impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.15-4: Would the project generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure?

Less than Significant. The City contracts with CalMet Services for solid waste collection. CalMet Services would be responsible for solid waste collection and hauling during both construction and operational phases of any future development projects. Solid waste generated during construction activities typically includes demolition of existing on-site structures, vegetation clearing, and grading would generate solid waste. Such waste would be source-separated on-site for reuse, recycling, or proper disposal. Bins for the various construction material waste types would typically be provided on-site by CalMet Services, who would also transport waste materials to the proper facilities for disposal. For future operations, CalMet Services would offer a variety of trash collection and recycling services.

It is anticipated solid waste from future development facilitated by the Project would be disposed of at the Bowerman Landfill in the City of Irvine. The Bowerman Landfill receives an annual tonnage of 2,142,000 with an average of 6,865 tpd and its permitted daily disposal at the Bowerman Landfill is

11,500 tpd. The Bowerman Landfill had a remaining capacity of 106.8 million tons and a remaining lifespan of 32 years. Solid waste generated by future developments would represent a nominal increase in disposal rates. Existing landfill capacity would be sufficient to serve future development within the City.

All future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including those related to solid waste reduction and recycling, including water management during construction and operations, including DMC §9528: Solid Waste. Considering these requirements, the Project implementation would not generate solid waste in excess of state or local standards, or in excess of local infrastructure's capacity. Therefore, impacts would be less than significant and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.15-5: Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. State, County, and local agencies with regulatory authority related to solid waste include the California Department of Resources Recycling and Recovery and the City. Regulations specifically applicable to the proposed project include the California Integrated Waste Management Act of 1989 (AB 939), Section 4.408 of the CalGreen Code, and SB 341, which requires multi-family residential development and commercial uses to implement recycling programs.

The Integrated Waste Management Act, which requires every City and County in the state to prepare a Source Reduction and Recycling Element (SRRE) to its Solid Waste Management Plan, identifies how each jurisdiction will meet the state's mandatory waste diversion goal of 50 percent by and after the 2000. The diversion goal has been increased to 75 percent by 2020 by SB 341. The 2016 CalGreen Code §4.408 requires preparation of a Construction Waste Management Plan that outlines ways in which the contractor would recycle and/or salvage for reuse a minimum of 65 percent of the non-hazardous construction and demolition debris.

As previously noted, all future projects would be subject to the City's development review process, as detailed in Chapter 5 of the Specific Plan, and would be required to demonstrate consistency with DGP policies and DMC requirements, including those intended to minimize solid waste generation. During the construction phase, the proposed project would comply with the CalGreen Code through the recycling and reuse of at least 65 percent of the non-hazardous construction and demolition debris from the project site. No conflict with statutes and regulations related to solid waste would occur and no mitigation is required.

4.15.6 CUMULATIVE IMPACTS

The context for assessing cumulative environmental impacts associated with utilities is primarily the service area associated with each of the water, wastewater, solid waste disposal, and telecommunications, and energy facilities that serve the Focus Area. As previously mentioned, analysis regarding electrical and natural gas facilities is included in **Section 4.5, Energy**. The cumulative impacts analysis evaluates whether the provision of utility services for the growth projected to occur in the future,

along with the currently proposed project, would exceed the capacity of existing or planned utility infrastructure, requiring the construction of new infrastructure that could cause significant environmental impacts not already addressed as part of the proposed project or otherwise anticipated in conjunction with each agency's growth plans.

Wastewater. Other cumulative projects with the City's service area could result in a cumulative increase in demand for wastewater service facilities. All new facilities proposed or necessitated by cumulative projects would be subject to applicable review, and projects would be required to comply with the other applicable laws and regulations protecting environmental resources. Adherence to the above laws and regulations would ensure that neither the proposed Project nor other cumulative projects would result in demand for wastewater treatment services that exceeds the existing entitlements and resources for wastewater services and impacts would be less than cumulatively considerable.

Water. The proposed Project would involve an increase in demand for water supplies. Past, present and reasonably foreseeable future projects also could result in water supply impacts, and incrementally increase the long-term demand for water service, similar to the proposed project. However, under the provisions of SB 610, all past, present, and future projects in the surrounding area would be required to prepare a comprehensive WSA as applicable. The WSAs for the projects that would require a WSA, in conformance with the 2015 UWMP, would evaluate the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed, on a project-by-project basis. Any new water facilities would undergo separate environmental review and require compliance with all applicable County and City water supply ordinances, laws and regulations. Each applicant also must fund the costs of the water-related infrastructure needed to serve a particular site. Therefore, cumulative impacts associated with adequate water service and supplies would be less than cumulatively considerable.

Solid Waste. Although the proposed Project and cumulative projects would result in an increase in the amount of solid waste sent to landfills, compliance with state and local waste diversion requirements would contribute to the longevity of existing and proposed landfills that would serve the projects and ensure that cumulative impacts to solid waste are less than significant. As stated above, AB 341 sets a goal of 75 percent of solid waste generated statewide to be source reduced, recycled, or composted by 2020. This would require all cumulative projects to meet a 75 percent diversion rate after 2020. Therefore, through compliance with the applicable regulations, the related projects would significantly reduce the amount of solid waste that would be generated and distributed to landfills. Cumulative impacts associated with adequate solid waste capacity in landfills would be less than cumulatively considerable.

Telecommunications. The proposed Project and cumulative projects would result in an increase in the construction of additional telecommunications equipment, all of which is readily available. The equipment would be installed on each site and would not affect surrounding sites. Similar to the proposed Project, the cumulative projects would be required to coordinate their respective projects, sites, and requirements with the service provider to ensure that connectivity is not disturbed and that proper conduits are installed relative to their respective projects. Cumulative impacts associated with adequate telecommunications capacity would be less than cumulatively considerable.

4.15.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable utility or service impacts have been identified.

4.15.8 REFERENCES

CalRecycle. 2021. *Solid Waste Information System Database – Frank R. Bowerman Sanitary Landfill.* Available at https://www2.calrecycle.ca.gov/SolidWaste/Site/Search. Accessed May 15, 2021.

City of Downey. 2020. *Downey Municipal Code.* Available at http://qcode.us/codes/downey/?view=desktop. Accessed May 15, 2021.

City of Downey. February 2018. *2015 Urban Water Management Plan.* Available at https://www.downeyca.org/home/showpublisheddocument/2428/636985752928000000. Accessed May 13, 2021.

City of Downey. January 2005. *Vision 2025 General Plan*. Available at https://www.downeyca.org/home/showpublisheddocument/154/636977201799600000. Accessed May 15, 2021.

ESA. June 2020. Rancho Los Amigos South Campus Project Final EIR, SCH No. 2017081017.

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5.0 LONG-TERM IMPLICATIONS OF THE PROPOSED PROJECT

5.1 SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE MITIGATED

State CEQA Guidelines §15126.2(b) requires that the EIR describe any significant impacts, including those that can be mitigated but not reduced to less than significant levels. The environmental effects of the proposed RLASCSP are addressed in **Sections 4.1** through **4.15** of this PEIR. Implementation of the RLASCSP (proposed Project) would result in potentially significant impacts for the following topical issues: Aesthetics, Hazards and Hazardous Materials, Noise, and Tribal Cultural Resources. Implementation of mitigation measures provided in this PEIR would reduce these impacts to levels considered less than significant with the exception of the following:

- Air Quality
- Cultural Resources
- Greenhouse Gas

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES WHICH WOULD BE CAUSED BY THE PROPOSED PROJECT SHOULD IT BE IMPLEMENTED

State CEQA Guidelines §15126.2(c) defines an irreversible impact as an impact that uses nonrenewable resources during all phases of a project. Project implementation would require the long-term commitment of natural resources and land. Project implementation would result in the commitment of land resources with mixed-uses. Implementation of the Specific Plan is expected to require infrastructure to support the proposed land uses, including utilities and streetscape improvements. Construction and long-term operation of future development in the Focus Area would require the commitment and reduction of available nonrenewable and slowly renewable resources, including petroleum fuels and natural gas (for vehicle use, construction, lighting, heating, and cooling of structures) and lumber, sand/gravel, steel, copper, lead, and other metals (for use in building construction, piping, and roadway infrastructure). Other resources that are slow to renew and/or recover from environmental stressors would also be impacted by Project implementation; examples include air quality, through the combustion of fossil fuels and production of greenhouse gases and water supply, through the increased potable water demands for drinking, cooking, cleaning, landscaping, and general maintenance needs.

5.3 GROWTH INDUCING IMPACTS OF THE PROPOSED ACTION

State CEQA Guidelines §15126.2(e) requires the evaluation of the growth-inducing impacts of a project. In assessing the growth-inducing impacts of a project, State CEQA Guidelines §15126.2(e) indicates that the lead agency is not to assume that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment. Typically, growth-inducing impacts result from the provision of urban services and the extension of infrastructure (including roadways, sewers, or water service) into an undeveloped area. Growth-inducing impacts can also result from substantial population increase, if the added population may impose new burdens on existing community service facilities, such as increasing the demand for service and utilities infrastructure and creating the need to expand or extend services, which may induce further growth.

To address this issue, potential growth-inducing effects are examined through analysis of the following questions:

- Would this Project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?
- Would this Project result in the need to expand one or more public services to maintain desired levels of service?
- Would this Project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
- Would approval of this Project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

Would this Project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?

The Project does not include extension or construction of major infrastructure to support the proposed land uses. The Specific Plan area, inclusive of the Focus Area is developed with existing infrastructure including roadways, sidewalks, utilities, and service systems that would be upgraded and improved as a part of projects associated with the long-term Project implementation. The Project proposes land use regulations which would allow for future infill development on underutilized land. Approval of the Project would redefine the nature of future growth in the Focus Area by providing goals and policies, development standards, design guidelines, infrastructure improvements, and implementation strategies for area. The Project assumes the development of 700 DUs and 1,130,000 SF of non-residential uses. Although the Project would change existing regulations pertaining to land development, the Project would not spur additional growth other than that already anticipated and would not eliminate impediments to growth. Consequently, the Project would not foster growth-inducing impacts.

Would this Project result in the need to expand one or more public services to maintain desired levels of service?

The Specific Plan area, inclusive of the Focus Area is in an urbanized area and public services are currently provided. The Project does not propose direct development and can be served by the existing fire, school, police, and library services. However, as described in **Section 4.12: Public Services and Recreation**, future development facilitated by the Project would be reviewed on a project-level to maintain desired levels of service.

Would this Project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?

The goal of the Project is to encourage and promote economic development and revitalization to enhance the RLASCSP's attractiveness to the local and regional marketplace. The Project would facilitate and encourage transit-oriented commercial, retail, and mixed-use opportunities, medium density residential development, public and open spaces, an improved pedestrian environment, and a variety of transportation choices that take advantage of future and existing public transit system.

Any future individual development project resulting from Project implementation would create construction-related jobs such as design, engineering, and construction. Although construction jobs are temporary in nature, new development can also provide long-term employment opportunities. As new residential units are developed and occupied, residents in the Specific Plan area would seek shopping, entertainment, employment, home improvement, auto maintenance and other economic opportunities in Los Angeles County, including the RLASCSP. Additionally, businesses and services would serve residents, employees, and visitors in the RLASCSP, as well as adjacent cities and Los Angeles County as a whole.

Would approval of this Project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

The Project would not involve any precedent-setting changes in land use regulations. The Project would require discretionary approvals by the City, including approval of the Project, approval of a General Plan Amendment, and approval of a zoning amendment. The RLASCSP describes the goals and policies, development standards, design guidelines, infrastructure improvements, and implementation strategies for the Focus Area. The standards and provisions contained in the Project constitute the primary land use and development standards for the area. The Project standards and provisions would be applied in addition to the provisions as set forth in the Downey Municipal Code.

A Mitigation Program has been identified requiring subsequent site-specific development projects to comply with all applicable federal, state, and local regulations, plans, policies, and ordinances such that there are no conflicts with adopted land development regulations and that environmental impacts are minimized as the Project is implemented.

It is noted that the successful establishment of new residential and non-residential development within the Specific Plan area may encourage continued development and reuse of existing properties. It would be speculative to forecast the indirect effect of the Project on development in other areas of the City and County. As noted for future projects in the Specific Plan area, the City would be responsible for the review of other development projects including the evaluation of potential environmental effects.

Project implementation would allow for site-specific development projects in the Focus Area. The Project would provide a framework for future development to promote transit-oriented mixed-uses and revitalization of the Focus Area.

5.4 MANDATORY FINDINGS OF SIGNIFICANCE

CEQA requires preparation of an EIR when certain specified impacts may result from construction or implementation of a project. An EIR has been prepared for the Project, which fully addresses all of the Mandatory Findings of Significance, as described below.

- *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?*

In practice, this is the same standard as a significant effect on the environment, which is defined in §15382 of the State CEQA Guidelines as "a substantial or potentially adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna,

ambient noise, and objects of historic or aesthetic significance." This EIR in its entirety addresses and discloses all known potential environmental effects associated with the development of the Project including direct, indirect, and cumulative impacts. A summary of all potential environmental impacts, level of significance and mitigation measures is provided in the **Executive Summary** of this PEIR.

- *Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?*

Section 5.2: Significant Irreversible Environmental Changes, of this document addresses the short-term and irretrievable commitment of natural resources to ensure that the consumption is justified on a long-term basis. As summarized under Section 5.2, Project implementation would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these resource quantities for future generations or for other uses during the Project's life. However, use of such resources would be on a relatively small scale in a regional context. Although irreversible environmental changes would result from Project implementation, such changes would not be considered significant. In addition, the **Executive Summary**, identifies all significant and unavoidable impacts that could occur that would result in a short-term impact on the environment. There would be periodic, temporary, unavoidable significant noise impacts that would cease upon completion of construction activities. Lastly, **Section 5.3: Growth-Inducing Impacts of the Proposed Action**, identifies any long-term environmental impacts associated with economic and population growth that are associated with the Project. The Project would indirectly influence population growth in the City. The Project would not include the construction or extension of major infrastructure facilities.

- *Does the project have impacts which 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, other current projects and probable future projects)?*

Cumulative impacts are addressed in Sections 4.1 through 4.15 of this PEIR.

- *Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?*

Under this standard, a change to the physical environment that might otherwise be minor must be treated as significant if people would be significantly affected. This standard relates to adverse changes to the environment of human beings generally, and not to effects on particular individuals. While changes to the environment that could directly or indirectly affect human beings would be possible in all of the CEQA issue areas previously listed, those that could directly affect human beings include aesthetics, air quality, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, land use and planning, public services and utilities, transportation/traffic, water resources, wildfire hazards, and climate change, all of which are addressed in the appropriate sections of this EIR and in the Initial Study; see Table of Contents for specific section numbers. No topic areas were determined to have a substantial adverse effect on human beings.

6.0 ALTERNATIVES TO THE PROPOSED PROJECT

6.1 CEQA REQUIREMENTS

Under CEQA, the identification and analysis of alternatives to a project is a fundamental part of the environmental review process. Public Resources Code (PRC) §21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is ... to identify alternatives to the project."

Direction regarding the definition of project alternatives is further provided in State CEQA Guidelines §15126.6(a), as follows:

> An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.

In selecting alternatives to the Rancho Los Amigos South Campus Specific Plan Project ("RLASCSP" or "proposed Project"), the City of Downey (City), as Lead Agency, is to consider alternatives that could feasibly attain most of the basic objectives of the Project and avoid or substantially lessen one or more of the significant effects. The State CEQA Guidelines emphasize that the selection of project alternatives be based primarily on the ability to reduce impacts relative to a proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."

The State CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making. The range of potential alternatives to the proposed project shall also include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. An alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative need not be considered. State CEQA Guidelines §15126.6(f)(1) states that:

> Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site...

Beyond these factors, the State CEQA Guidelines require the analysis of a "no project" alternative and an evaluation of alternative location(s) for the project, if feasible. State CEQA Guidelines §15126.6(c) also requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible and discuss the reasons for their rejection.

Based on the alternatives analysis, an environmentally superior alternative is to be designated. "If the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."

6.2 PROJECT SUMMARY

The proposed Project is a City-initiated Specific Plan for property that is owned by the County of Los Angeles (County). Multiple concurrent development projects and studies were in process and considered when developing this Specific Plan. In accordance with the goals of the City of Downey's Vision 2025 General Plan (DGP), the RLASCSP promotes economic development with a focus on a diverse mixture of job-generating land uses. The plan also prioritizes creating more livable communities with access to both regional transit and promotes alternative transit opportunities.

Over one-half (approximately 63 percent or 109 acres) of the approximately 172-acre Specific Plan area, will either remain unchanged, or is committed to other projects being planned and studied by the County[1] and the Los Angeles Metropolitan Transportation Authority (Metro)[2]. The County and Metro projects are analyzed under separate environmental documents. The County's Rancho Los Amigos South Campus Project (County Project) has been approved and the EIR is incorporated by reference herein. The remainder of the Specific Plan area (approximately 37 percent or 62.5 acres) comprises the Project site, referred in this PEIR as the Focus Area. The Focus Area is planned and programmed for a mix of transit-oriented residential, retail, and office uses. Accordingly, this PEIR analyzes the RLASCSP's proposed development within the Focus Area.

The overall RLASCSP area has four geographical districts: Flex Tech/Bio Medical (FTBM), Regional Public Facilities (RPF), Transit-Oriented Development (TOD), and Community Serving (CS). The Focus Area includes three of the four districts: RPF, TOD, and CS; no FTBM land is located within the Focus Area.

Within the Focus Area, the RLASCSP would allow a maximum development of 700 dwelling units (DUs) and approximately 1,130,000 square feet (SF) of new, non-residential (commercial, retail, office, public facilities, etc.) land uses.

PROJECT OBJECTIVES

The following goals were developed for the RLASCSP through extensive community input and focused discussions with all stakeholders and reflect the intentions of the DGP.

6.3 SIGNIFICANT PROJECT IMPACTS

6.3.1 Significant and Unavoidable Impacts

As noted, State CEQA Guidelines §15126.6(b) states that "Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these

[1] Rancho Los Amigos South Campus Project" (County project) addressed in Rancho Los Amigos South Campus Project Final EIR (SCH No. 201708017) (Environmental Science Associates, June 2020).

[2] "West Santa Ana Branch Transit Corridor Project" (Metro project). Notice of Preparation of an EIR (SCH No. 2017061007). (Metro, July 2018).

alternatives would impede to some degree the attainment of the project objectives, or would be more costly."

Therefore, the alternatives evaluated in this PEIR have been selected because they are anticipated to reduce and/or eliminate one or more significant impacts associated with the proposed Project. Potentially significant environmental impacts that would result from the Project are evaluated in **Section 4.1** through **Section 4.15** this PEIR. With implementation of the respective Standard Conditions and Requirements (SCs) and Mitigation Measures (MMs) identified for each topical issue, most of the potentially significant impacts resulting from the Project would be reduced to a level considered less than significant. The proposed Project impact listed below would remain significant and unavoidable even after mitigation.

Air Quality

- Threshold 4.2-1 – conflict with implementation of the applicable air quality plan because of construction and operation emissions. Construction activities associated with individual development projects facilitated by the RLASCSP could potentially exceed the South Coast Air Quality Management District's (SCAQMD's) significance thresholds. Construction activity that would occur over the next 14 years in accordance with the RLASCSP would cause temporary, short-term emissions of various criteria air pollutants. Additionally, at a programmatic level, due to the size of the Project, operational emissions would exceed thresholds and impacts would be potentially significant. Implementation of all SCAQMD rules, regulations, and control measures may not be feasible for future development projects. Therefore, impacts would be significant and unavoidable despite the fact that the Specific Plan would be consistent with the growth forecasts used in the development of the SCAQMD's Air Quality Management Plan (AQMP).
- Threshold 4.2-2 –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. The proposed Project would result in significant construction and operational impacts. Due to the expected exceedance of the thresholds, the proposed Project would not be consistent with the AQMP, which is intended to bring the South Coast Air Basin (Air Basin) into attainment for all criteria pollutants. Therefore, the Project's contribution to regional pollutant concentrations would be cumulatively considerable.

Cultural Resources

Threshold 4.4-1 – cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5. Future development within the Focus Area assumes the demolition of contributor and non-contributor buildings and would remove remaining features of the Historic District's original 1888 Site Plan. Even with the implementation of these measures, impacts to the Historic District would remain significant and unavoidable since the Historic District would no longer exist and there is no feasible mitigation to reduce this impact to less than significant level.

Greenhouse Gas Emissions

Threshold 4.6-1 –generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment. Future construction of development within the Focus Area would generate temporary GHG emissions primarily due to the operation of construction equipment and truck trips. These activities would cause short-term, unavoidable increases in GHG emissions.

The degree and extent of future project compliance with GHG thresholds and the Project details necessary to calculate emission reductions are not available at this time. Future development associated with implementation of the Specific Plan would need to be analyzed on a project-by-project basis to determine the extent of each project's potential contribution to global climate change and appropriate mitigation measures specific to each project. Due to the uncertainty of timing of future development as well as project-specific details, future development could exceed SCAQMD recommended threshold of 3,000 MT CO_2e per year. Operational impacts are considered significant and unavoidable.

6.3.2 Impacts Mitigated to a Less Than Significant Level

Impacts associated with the following topics would be significant without the implementation of mitigation measures, but would be reduced to a less than significant levels if the mitigation measures identified in the PEIR are implemented:

- Aesthetics – substantially degrade the existing visual character or quality of public views of the site and its surroundings: project conflict with applicable zoning and other regulations governing scenic quality
- Air Quality – expose sensitive receptors to substantial pollutant concentrations: toxic air contaminants
- Biological Resources – 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: potential effects to nesting birds and bats
- Cultural Resources: Archaeological Resources – cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 and potential disturbance to human remains including those interred outside of a dedicated cemetery.
- Cultural Resources: Paleontological Resources – directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- Hazards and Hazardous Materials – create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- Noise – generate a substantial temporary 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 during on-site construction activities or during project operations.
- Noise – generate excessive groundborne vibration or groundborne noise levels.
- Tribal Cultural Resources – cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §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.

6.3.3 Feasibility

Section 15126.6(f)(1) of the State CEQA Guidelines (14 CCR) states:

> Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553; see *Save Our Residential Environment v. City of West Hollywood* (1992) 9 Cal.App.4th 1745, 1753, fn. 1).

Each Alternative was evaluated for its feasibility, its ability to attain the proposed Project's objectives, and its ability to reduce and/or eliminate significant impacts associated with the Project.

6.3.4 Alternatives Considered and Rejected

The State CEQA Guidelines Section 15126.6(c) provides that an EIR should identify alternatives that were considered for analysis but rejected and briefly explain the reasons for their rejection. According to the State CEQA Guidelines, the following factors may be used to eliminate alternatives from detailed consideration: the Alternative's failure to meet most of the basic Project objectives, the Alternative's infeasibility, or the Alternative's inability to avoid significant environmental impacts.

As discussed in **Section 2.0: Project Description**, the RLASCSP has been prepared to promote future development of the southern portion of the Rancho Los Amigos Campus and promote economic development with a focus on a diverse mixture of job-generating land uses. The Specific Plan also prioritizes creating more livable communities with access to both regional transit and promotes alternative transit opportunities.

As noted above, CEQA requires that alternatives evaluated in an EIR be potentially feasible. Feasibility is defined in CEQA as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (PRC Section 21061.1). Finally, alternatives that would neither avoid nor substantially lessen any of the significant unavoidable environmental effects of the project need not be evaluated in an EIR. (See, e.g., *City of Maywood v. Los Angeles Unified School District* [2012] 208 Cal.App. 4th 362,419.) Such alternatives can therefore be considered infeasible.

The following Alternative has been considered and rejected as infeasible.

Offsite Location Alternative

This Alternative considers the potential for the proposed Project be relocated elsewhere in the City. The City of Downey is largely developed and built out, with few large areas remaining for large development projects. Furthermore, the Focus Area is on County-owned land and contains several County facilities. An offsite location would not meet the objective of celebrating and reinforcing Downey's and the Rancho Los Amigos South Campus' character and history. Furthermore, no other sites within the City would be situated near mass public transit (i.e., WSAB Transit Corridor and proposed Gardendale Metro Station).

An offsite alternative location would not meet the RLASCSP objective related to the creation of a mixed-use, compact, and multi-modal environment. There is no offsite location available that can meet the basic Project objectives and be feasibly constructed.

6.4 PROJECT ALTERNATIVES

6.4.1 Alternative A: No Project/No Construction

Under State CEQA Guidelines §15126.6(e), the "no project" shall also be evaluated along with its impacts. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of the proposed project with the impacts of not approving the project. The "no project" analysis is required to discuss the existing conditions (at the time the Notice of Preparation is published), as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

If the project is not a land use or regulatory plan, for example a development project on identifiable property, the "no project" alternative is the circumstance under which the project does not proceed. If the project is not a land use or regulatory plan, for example a development project on identifiable property, the "no project" alternative is the circumstance under which the project does not proceed. Under this Alternative, the discussion would compare the environmental effects of the property remaining in its existing condition against environmental effects which would occur if the project is approved.

Alternative A assumes no change associated with the RLASP area, inclusive of the Focus Area. **Table 6-1** compares the acreage assumptions for Alternative A to the proposed Project. The majority of the Specific Plan area is accounted for by existing development and other independent projects, resulting in approximately 62.5 acres for the Focus Area. This PEIR recognizes that portions of the County's project area overlap with the City's RLASCSP Focus Area.

Table 6-1: Proposed Project and Alternative Acreages Summary

Description	Proposed Project	Alternative A
County Project	21.80	21.80
"No Change" Area	84.39	146.91
Metro Project	3.13	3.13
Focus Area	62.52	0
Total	**171.84**	**171.84**

As with the proposed Project, the continued use of the Los Angeles Public Works Road Maintenance building and the Los Angeles County Animal Shelter. The vacant and deteriorating structures associated with the Rancho Los Amigos National Rehabilitation Center would remain. Under the Alternative A scenario, no improvements site would occur. This Alternative would not require an amendment to the Downey General Plan, Zoning Map Amendment, or any of the other actions associated with the Rancho Los Amigos South Campus Specific Plan Project.

COMPARATIVE ANALYSIS OF ENVIRONMENTAL IMPACTS

Aesthetics

Under the Alternative A scenario, the existing land uses would continue, and the aesthetic character of the site would not change. Separate from the Los Angeles County facilities which are still in use, the Focus Area site is characterized as a blighted property that is under significant deterioration and disrepair. Many of the existing buildings are dilapidated, and the property is inadequately maintained and devoid of maintained landscaping.

The existing sources of light and glare would continue to remain, and no new sources of light and glare would occur. Removal of the existing vertical features and sources of light and glare, and replacement with residential and non-residential land uses envisioned by the RLASCSP would not occur under Alternative A.

Lighting in the Focus Area would not increase under Alternative A. However, this is not identified as a significant impact. The existing deteriorated and dilapidated structures would remain.

Air Quality

Short-term air quality impacts from demolition, grading, and construction activities associated with the proposed Project would not occur with this Alternative because no development would occur. The Project's construction-related and operational emissions would be avoided.

Biological Resources

This Alternative would have no impacts to biological resources. Trees and other vegetation in the Focus Area that currently could be used for nesting by migratory birds protected under the Migratory Bird Treaty Act (MBTA) would remain because no existing vegetation would be removed. Roosting opportunities for bats would be retained.

Cultural Resources

The proposed Project would result in significant and unavoidable impacts to historic resources and less than significant impacts to as yet undiscovered archaeological and paleontological resources, with mitigation incorporated. Similarly, this Alternative would also avoid the Project's potential for disturbing human remains. Under this Alternative, no historical structures would be removed. The County's approved Project assumes that implementation would result in the loss of eligibility of the area as a Historic District under the Register of Historic Places (National Register) and would be delisted from the California Register of Historical Resources (California Register). The County's Project assumes the retention of five individually eligible buildings and features; four are within the Focus Area. However, if the County's Project were not constructed, Alternative A assumes that all buildings and structures would remain and impacts to the Historic District would not occur.

Energy

The existing Los Angeles County facilities would continue to operate under this Alternative. The proposed Project's energy usage during construction associated with water usage, diesel fuel consumption, and gasoline consumption would not occur with Alternative A because no construction activities would occur. Furthermore, no development would occur and energy resources would remain the same.

Greenhouse Gas Emissions

GHG emissions from demolition, grading, and construction activities and GHG emissions from operational activities associated with the proposed Project would not occur with this Alternative because no land uses would be removed and the Project's proposed development would not be constructed. The Project's GHG emissions, which would be significant, would be avoided.

Hazards and Hazardous Materials

No impacts related to the potential of increased safety risk to workers due to the transport, handling, and disposal of hazardous materials and waste, and potential accidental release of hazardous materials or waste would occur. No construction or demolition would occur under this Alternative and therefore impacts related to asbestos or lead-based paint exposure would not occur. Alternative A would be environmentally superior to the proposed Project regarding hazards and hazardous materials, since no construction or ground disturbing activities would occur, and no buildings or structures would be demolished.

Hydrology and Water Quality

Alternative A would not result in short-term water quality impacts because no construction activities would occur. The Project's less than significant short-term water quality impacts would be avoided with this Alternative. Drainage flows and groundwater supplies would remain the same. No development would occur, and therefore no changes in drainage patterns would occur. It should be noted that no infrastructure improvements would be implemented under the Alternative A scenario.

Land Use and Planning

Neither Alternative A nor the proposed Project would physically divide an established community. Because no development would occur under this alternative scenario, no land use designation changes would occur and no discretionary permits/approvals would be required. Existing uses on the site would remain. This Alternative assumes the existing vacant and dilapidated structures to remain in the Focus Area.

Noise

Because no construction would occur, there would be no noise or vibration impacts. The existing uses would continue to operate, and the existing noise environment would not change. This Alternative would be environmentally superior to the proposed Project regarding noise. All noise and vibration impacts resulting from Specific Plan implementation would be avoided.

Population and Housing

Under Alternative A, the Focus Area would remain in its present condition and future residential development facilitated by the RLASCSP would not be developed. As with the proposed Project, this Alternative would not induce substantial unplanned population growth or displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. Alternative A would not generate any new jobs, involve the development of additional housing, or cause increases in the City's resident population. No accommodation for future housing would occur, and the City would be required to find other candidate housing sites suitable to meet its Regional Housing Needs Assessment (RHNA) allocation.

Public Services and Recreation

Alternative A would not change the existing demand for public services or recreational facilities because no new development would occur. This Alternative would retain the existing land uses, with no increase in population or demand for these services and facilities.

Transportation

Under Alternative A, the existing internal roadways would remain. The existing active uses within the Focus Area would continue to generate vehicle trips. No new development would occur, therefore no change in traffic volumes on surrounding roadways, or increase in vehicles miles traveled (VMT) would occur.

Tribal Cultural Resources

Under this Alternative, no groundbreaking activities would occur and therefore any undiscovered tribal cultural resources would remain untouched. There would be no potential impacts to Native American tribal cultural resources because no ground disturbing activities would occur.

Utilities and Service Systems

Because Alternative A assumes no construction or development, there would be no increase in utility and service systems demands. Existing uses would contain to operate and be served by existing utilities.

CONCLUSION

Alternative A would have no significant impacts in comparison to the Proposed Project. Significant unavoidable impacts to historic resources, and significant unavoidable air quality and GHG emission impacts would not occur should no development occur in the Focus Area associated with the City's RLASCSP. No mitigation would be required to reduce potential significant impacts to a less than significant level associated with the topics of Aesthetics, Biological Resources, Cultural Resources: Archaeological Resources, Cultural Resources: Paleontological Resources, Hazards and Hazardous Materials, Noise, and Tribal Cultural Resources. No significant impacts are anticipated related to the remainder of the topics addressed in this PEIR.

When evaluating the desirability and feasibility of an alternative, it is important to evaluate the ability of that Alternative to meet project objectives. An alternative does not need to meet all project objectives to be considered potentially feasible. However, Alternative A would not achieve any of the objectives of the proposed Project.

6.4.2 Alternative B: No Project/Existing Land Use Designation

Under this alternative scenario, the "no project" alternative is the circumstance under which the proposed Project would not proceed but the existing environmental conditions would not be preserved. The Focus Area is wholly within County-owned land in the City of Downey. The RLASCSP area, inclusive of the Focus Area, has a General Plan designation of Commercial Manufacture (CM). The Specific Plan area is zoned Single-Family Residential (R-1 5,000), Rancho Business Center Specific Plan (SP 88-1), and Rancho Los Amigos Specific Plan (SP 85-1). The Focus Area is zoned SP 88-1. SP 88-1 reflects the CM (Commercial Manufacturing) designation's intent and purpose. SP 88-1 does not specify exact density limitations or floor to area ratios (FAR), so the Commercial Manufacturing (C-M) zoning development standards would

most likely apply. The C-M zoning has a maximum allowable 0.6 FAR for lot larger than 87,120 SF. The Focus Area developable area is 47.8 acres. Therefore, for purposes of Alternative B, the maximum allowable development in the Focus Area is 1,249,300 SF of commercial manufacturing uses. This Alternative would demolish the existing uses and, in its place, construct up to 1,249,300 SF of commercial and industrial uses.

COMPARATIVE ANALYSIS OF ENVIRONMENTAL IMPACTS

Aesthetics

Alternative B assumes redevelopment of the existing blighted area; the existing County facilities use, and associated surface parking would be removed and replaced with new commercial manufacturing land uses and ancillary improvements. Under this alternative scenario, the change to the visual character of the Focus Area would be greater because this Alternative involves proportionately more development than the proposed Project (1,130,000 SF compared to the 1,249,300 SF of C-M uses) and taller structures (RLASCSP would permit up to 75 feet, or 6 stories compared to C-M zoning which allows up to 10 stories). A new Specific Plan would not be implemented; therefore, this Alternative would conform to current development standards.

Both Alternative B and the proposed Project would introduce new sources of light. However, because this Alternative involves commercial manufacturing land uses, with potentially taller structures, there could be more sources of light. As with the proposed Project, it is anticipated that impacts could be mitigated to a less than significant level.

Air Quality

Short-term air quality impacts from demolition, grading, and construction activities associated with the proposed Project could occur with Alternative B. Since the Alternative would result in more allowable development, up to 1,249,300 SF compared to the proposed Project's 1,130,000 SF but no residential development, the Alternative would likely result in similar construction-related emissions. Given that this Alternative assumes only commercial manufacturing uses, operational emissions are likely to be higher (i.e., warehouse, delivery, logistic operations) which generate more truck trips compared to the proposed Project. Both Alternative B and the proposed Project would have significant unavoidable air quality emissions during construction and operations.

Biological Resources

This Alternative would have similar impacts to biological resources compared to the proposed Project. Trees and other vegetation on the site that currently could be used for nesting by migratory birds protected under the MBTA would be subject to removal. Bat roosting habitat could also be impacted. Impacts associated with Alternative B and the proposed Project could be mitigated to a less than significant level.

Cultural Resources

The proposed Project would result in significant and unavoidable impacts to historic resources and less than significant impacts to as yet undiscovered archaeological and paleontological resources and human remains, with mitigation incorporated. These potential Project impacts would occur also under Alternative B because site redevelopment would result in similar ground disturbing activities and demolition and removal of historical structures.

Energy

The energy usage during construction associated with water usage for dust control, diesel fuel consumption from on-road hauling trips and off-road construction diesel equipment, and gasoline consumption from on-road worker commute and vendor trips would be similar to the proposed Project. Commercial manufacturing uses would be more energy intensive compared to the proposed Project, due to heavy-duty machinery and equipment associated with manufacturing practices. Although energy use would be expected to be greater, no significant impacts are anticipated.

Greenhouse Gas Emissions

Future development facilitated by this Alternative would emit more GHG emissions compared the proposed Project. Commercial manufacturing land uses could include warehouses and manufacturing facilities, which could involve more truck trips and operate heavy machinery, which therefore emit higher GHG emissions. Both scenarios assume the GHG impacts would be significant and unavoidable.

Hazards and Hazardous Materials

The potential construction-related impacts involving increased safety risk to workers due to the transport, handling, and disposal of hazardous materials and waste, which were considered to be less than significant with mitigation incorporated, would be similar with this Alternative. Alternative B would redevelop the Focus Area and construction activities would occur. Demolition of the existing structures would occur and impacts related to release of asbestos or lead-based paint would be similar compared to the proposed Project.

A similar number of persons could be adversely affected by accidental upset or accident conditions concerning hazardous materials, because both the Alternative and the proposed Project would increase the number of persons in the Focus Area. However, risks of hazards associated with manufacturing uses permitted under this Alternative would increase, as more machinery and chemicals would be brought on-site within the Focus Area. Although the potential for operational impacts may be greater, both the proposed Project and Alternative B would mitigate impacts to a less than significant level.

Hydrology and Water Quality

Alternative B would result in short-term impacts to water quality similar to the proposed Project, as the existing uses would be demolished, and the Focus Area redeveloped. The less than significant short-term water quality impacts that would occur under the proposed Project would occur also with this Alternative.

The proposed Project would reduce the rate and amount of stormwater runoff, improve runoff quality, and decrease impervious surfaces in the Focus Area. Similarly, Alternative B would demolish existing uses, convert surfaces from pervious to impervious, and alter existing drainage patterns. However compliance with the regulatory framework would likely result in similar impacts compared to the proposed Project.

Land Use and Planning

The land use consistency issues associated with the Project's proposed uses were concluded to be less than significant. Unlike the proposed Project, Alternative B would be consistent with the existing land use designations for the Focus Area; no land use changes would be required with this Alternative. Like the proposed Project, Alternative B's impacts would be similarly less than significant. Potential impacts would be evaluated through the established City development review processes and would be subject to

compliance with the established regulatory framework, including the Downey Vision 2025 General Plan (DGP) and Downey Municipal Code (DMC) standards.

Noise

Both the proposed Project and Alternative B would generate construction-related short-term noise impacts from stationary and mobile sources and vibration impacts; both scenarios would allow for the development of over 1,000,000 SF within the Focus Area. Construction-related noise impacts would be similar for both projects and would be less than significant with mitigation. Mobile noise impacts would be more significant under this Alternative due to the potential for truck trips associated with commercial manufacturing operations. Both the proposed Project and Alternative B would result in vibration impacts during construction which would be mitigated to a less than significant level. During operations, noise impacts associated with this Alternative may be higher due to the commercial manufacturing land uses which typically include more truck trips compared to a mix of residential and commercial uses.

Population and Housing

The proposed Project would increase population through development of up to 700 DUs. Under this Alternative, this population increase would not occur; rather, this Alternative would redevelop the existing institutional uses with commercial manufacturing uses. Therefore, this Alternative would not induce population growth in the area. Because this Alternative assumes development consistent with the DGP, it would not exceed the growth forecasts from the relevant planning documents such as the Connect SoCal RTP/SCS. Therefore, as with the Project, this Alternative would result in less than significant impacts involving population growth.

Public Services and Recreation

During construction, both the proposed Project, Alternative B would temporarily increase the demand for fire, police, and medical services in and near the Focus Area due to the potential increased hazards associated with construction and demolition activities and use of materials. The Alternative would result in similar impacts as the proposed Project since both would result in redevelopment of the Focus Area.

The proposed Project would construct 700 DUs and 1,130,000 SF of non-residential uses in commercial, retail, office, public facilities, etc.) uses, which would increase demand for fire, police, medical, schools, and library services, as well as parks and recreational facilities. Alternative B would retain the existing land use designation and zoning, with no direct increase in population or corresponding demands for public services and recreational facilities. Rather, under this Alternative, commercial manufacturing development would occur with proportionately less demand for recreational facilities. Under both scenarios, no significant impacts have been identified. Since no residential development would occur and fewer people would reside within the Focus Area, demand for public services would be less compared to the proposed Project.

Transportation

Project construction would result in less than significant impacts concerning emergency access. Alternative B would result in slightly higher development capacity, but comply with the same regulations regarding traffic design and access compared to the proposed Project. Therefore, the Alternative would have similar impact emergency access during construction.

The proposed Project contains a Transit Oriented Development (TOD) sub-district, with residential and non-residential uses proximate to the future Metro West Santa Ana Branch (WSAB)/Metro Project, specifically the proposed Gardendale Transit Station. The proposed Project would likely qualify for OPR VMT screening due to proximity of future transit stations. Alternative B would redevelop the Focus Area with new commercial manufacturing development but no residential uses would be implemented. Without this mix of land uses, Alternative B may benefit from this surrounding TOD infrastructure to a lesser degree than the proposed Project. The nature of commercial manufacturing uses would involve more truck trips and deliveries, and would potentially increase VMT in the region.

Tribal Cultural Resources

Both the proposed Project and Alternative B could have significant impacts on yet undiscovered tribal cultural resources. Under both development scenarios, impacts can be mitigated to a less than significant level.

Utilities and Service Systems

Alternative B would generate temporary increased demands upon utilities and service systems during construction. Under this Alternative, the site's existing land uses would be replaced with a new commercial manufacturing use consistent with the land use designations. Increased development would result in an additional increase demand for water and wastewater use, solid waste generation, and electricity and natural gas consumption. However, this Alternative eliminates residential land use development from the Focus Area, and therefore utility demand may be similar or less than the proposed Project. Under both scenarios, impacts would be less than significant.

CONCLUSION

When compared to the proposed Project, Alternative B would not eliminate the significant unavoidable impacts. As with the proposed Project, remaining impacts could be reduced to a less than significant level with the incorporation of mitigation.

Alternative B would create a mixed-use community that provides jobs, residential, and supporting services with pedestrian-oriented amenities that facilitate walking and enhance livability. It would also provide several of the beneficial impacts of the Proposed Project, including implementing a reclaimed water system for existing and proposed uses and a first flush (storm water) water quality treatment facility on the project site.

With respect to Project objectives, Alternative B has the ability to "enhance economic success in the area" and may "promote sustainable principles in design and development." However, the remainder of the objectives would not be met including "establish a complementary mix of cultural uses, public spaces, and outdoor activities" and "support a flexible variety of land uses that further regional transportation and transit planning objectives."

6.4.3 Alternative C: Adaptive Reuse/Reduced Project

Alternative C would minimize impacts by reducing demolition of historical structures in the Historical District and allow for the proposed Project's uses. Several historical buildings within the Focus Area would be adaptively reused and overall, a reduction in residential and non-residential uses would occur.

In June 2020, the County Board of Supervisors certified the Rancho Los Amigos South Campus Project Final EIR (SCH No. 201708017) and approved Alternative 4, Scenario 2. Under the approved County Project (Alternative 4, Scenario 2), several structures were identified as primary/ individually eligible for adaptive reuse or to be mothballed: Building No. 1238 (Casa Consuelo), No. 1300 (Power Plant), No. 1301 (Water Tower), No. 1302 (Shop and Laundry), No. 1100 (Administration Building), and the Moreton Bay Fig Tree. **Table 6-2: Adaptive Reuse and Mothballed Building Summary**, identifies the square footages of each building identified in the County EIR, and which are within the proposed Project's Focus Area.

Table 6-2: Adaptive Reuse and Mothballed Building Summary

Building Number/Name	Approximate Square Feet	Use	Within Focus Area?	Approximate Buffer Area (Acres)
1238 (Casa Consuelo)	37,808	Adaptive Reuse with County Uses	No	1.5
1300 (Power Plant)	10,175	Adaptive Reuse with County Uses	Yes	1.5
1301 (Water Tower)	-	Restored, repainted, seismic upgrades	Yes	
1302 (Shop and Laundry)	12,738	Mothballed, reserved for future County use	Yes	
1100 (Administration Building)[1]	14,975	Already Restored and Used by County	Yes	1
(Moreton Bay Fig Tree)	-	Preserved	Yes	1

Notes
[1]LACO No. 1100, Administration Building currently houses the Los Angeles County Sheriff's Department (LASD) Professional Standards Division

Source: ESA. June 2020. *Rancho Los Amigos South Campus Project Final Environmental Impact Report*

Building Nos. 1100, 1265, 1300, 1301, and 1302 are in the Focus Area. Alternative C assumes an approximate 3.5-acre buffer area surrounding each of the buildings/structures listed in **Table 6-2**. Therefore, the Focus Area developable acreage would reduce from approximately 47.8 acres to approximately 44.3 acres.

As noted in the table and consistent with the County Project, only Building No. 1300 would be eligible for adaptive reuse in the Focus Area. All other buildings and structures are either currently actively in use by the County or designated for mothballing and preserved for a future County use. If the County Project does not develop to its full development capacity, or economic financial burdens prevent development of the County Project, Building No. 1302 could be used by the City for development. This Alternative assumes 10,175 SF from Building No. 1300 and 12,738 SF from Building No. 1302 to be used for commercial and retail uses only.

Assuming an equal split among the proposed residential, retail and commercial uses within the 44.3 developable acreage (14.76 acres for each land use) and the additional 22,913 SF for retail commercial uses from the adaptive reuse of Building Nos. 1300 and 1302, the total development buildout of Alternative C would be 640 DUs and approximately 1,020,000 SF of non-residential uses, as shown in **Table 6-3: Comparison Between Proposed Project and Alternative C.**

Table 6-3: Comparison Between Proposed Project and Alternative C

Description	Residential DU	Non-Residential SF	Developable Acres	Density
Proposed Project	700	1,130,000	47.8	44 DU/AC[1]
Alternative C: Adaptive Reuse/Reduced Project	640	1,020,000[2]	44.3	43 DU/AC
Difference	60	110,000	3.5	1 DU/AC
% Difference	-8.5%	-9.7%	-7.3%	-

1. Residential densities in the RLASCSP range from 40–75 DU/AC across the four sub-districts. The RLASCSP and this PEIR have assumed an average density of 44 DU/AC.
2. Assumes 1/3 split among residential, retail, and commercial uses.

Source: Kimley Horn, 2021.

COMPARATIVE ANALYSIS OF ENVIRONMENTAL IMPACTS

Aesthetics

As with the proposed Project, Alternative C would not have a substantial adverse effect on a scenic vista and would not substantially damage scenic resources, and impacts would be less than significant. In addition, similar to the proposed Project, the Alternative would not conflict with applicable zoning and other regulations governing scenic quality, and the impact would be less than significant. A majority of future development would be new with the exception of the reuse of Building No. 1300 and No. 1302. Demolition of all other existing structures would result in significant impacts to existing character. Implementation of mitigation measures, similar to the proposed Project, would reduce impacts on visual character to a less than significant level.

Consistent with the proposed Project, this Alternative would not create a significant, new source of substantial light or glare; the impact would be less than significant. Alternative C would result in 60 fewer residential DUs and a reduction of 110,000 SF in non-residential uses. Aesthetic effects would be similar and impacts can be mitigated to a less than significant level.

Air Quality

Under the Alternative C scenario, less development would occur. Therefore, there would be an incremental reduction in construction and operation air quality emissions when compared to the proposed Project. Like the proposed Project, Alternative C assumes future development would occur over a period of 14 years. Project specific details are not available and therefore, future buildout of specific projects within the Focus Area could conflict with the applicable air quality plan and result in a considerable net increase of any criteria pollutant. This impact would be similar to the proposed Project and would remain significant and unavoidable.

Biological Resources

This Alternative would have similar impacts to biological resources compared to the proposed Project. Trees and other vegetation that currently could be used for nesting by migratory birds protected under the MBTA would be subject to removal as well as roosting habitat for bats. Although less development is proposed, the potential impacts would be the same or similar. Under both scenarios, impacts can be mitigated to a less than significant level.

Cultural Resources

Although Alternative C would adaptively reuse Building No. 1300 and No. 1302, impacts to historic resources would remain significant and unavoidable. Other historical buildings within the Focus Area would be demolished and the historic significance of the area would be substantially changed due to material impairment by demolition and alteration. The Historic District would not be eligible for the National Register and would be delisted from the California Register. Under both development scenarios, impacts to historic resources would be significant and unavoidable. With respect to potential impact to undiscovered archaeological and paleontological resources and human remains, impacts can be mitigated to a less than significant level.

Energy

The energy usage during construction associated with water usage for dust control, diesel fuel consumption from on-road hauling trips and off-road construction diesel equipment, and gasoline consumption from on-road worker commute and vendor trips would be slightly less with Alternative C compared to the proposed Project because of less construction activities. Due to the reduce development under this Alternative, energy consumption during operations would be incrementally reduced. Like the proposed Project, Alternative C's energy impacts would be less than significant.

Greenhouse Gas Emissions

Project-related GHG emissions would be significant and unavoidable. Since the Alternative would have less residential and non-residential development, incrementally less GHG emissions would occur when compared to the proposed Project. However similar to the proposed Project, specific development details facilitated are unknown. Construction and operation of future projects could occur throughout the buildout period. Consistent with the findings for the proposed Project, GHG emission impacts for Alternative C would be significant and unavoidable.

Hazards and Hazardous Materials

Potential construction-related impacts involving increased safety risk to workers due to the transport, handling, and disposal of hazardous materials and waste, which were considered to be less than significant with mitigation. Impacts would be the same or slightly less with this Alternative since less development would occur. The proposed Project's potential construction-related impacts involving demolition of buildings or structures with asbestos or lead-based paint, which were considered to be less than significant with mitigation incorporated, would be the same for Alternative C. Operational impacts from transport, handling, and disposal of hazardous materials and waste would similar with this Alternative, although slightly less due to fewer residential and non-residential development. Impacts would be mitigated to a less than significant level.

Hydrology and Water Quality

Alternative C would result in short-term impacts to water quality, similar to the proposed Project. Impacts may be incrementally less since less area would be disturbed. Short-term and long-term impacts would be less than significant.

Land Use and Planning

Like the proposed Project, Alternative C would not divide an established community. This Alternative would construct 60 fewer residences and reduced non-residential uses by 110,000 SF. This Alternative would be subject to the DGP and DMC, similar to the proposed Project. Impacts under both scenarios would be less than significant.

Noise

Construction and operational noise and vibration impacts associated with the proposed Project would result in a less than significant impact with mitigation incorporated. Construction-related short-term noise impacts from stationary and mobile sources and vibration impacts would also occur with Alternative C. Because less development is proposed, this Alternative's construction and operational noise impacts would be slightly less than the proposed Project. However, it is likely that construction impacts under this Alternative would likely result in similar noise impacts compared to the proposed Project. Neither the Alternative nor the proposed Project would result in impacts related to proximity to airstrips or an airport land use plan.

Population and Housing

The proposed Project would increase population through providing 700 DUs, replacing the existing institutional uses. Under this Alternative, this population increase would be less because 60 fewer residences would be constructed. Therefore, Alternative C would result in slightly less population growth in the area. Neither the proposed Project nor this Alternative would displace existing housing as none is present in the Focus Area. Although fewer residences would be constructed, this Alternative would still assist the City in meeting its RHNA allocation. Impacts associated with both development scenarios would be less than significant.

Public Services and Recreation

Project construction-related activities would increase the demands for fire, police protection, and medical services. Similar construction activities would occur under this Alternative; therefore, there would be similar construction-related demand for these services. Alternative C would result in fewer development, resulting in proportionately less demand for these public services and recreational facilities. As with the proposed Project, impacts would be less than significant.

Transportation

Project construction would result in less than significant impacts concerning emergency access. Like the proposed Project, this Alternative would have a TOD-sub-district and would still propose residential and non-residential uses within close proximity to the future Metro West Santa Ana Branch (WSAB)/Metro Project, and proposed Gardendale Transit Station. This Alternative would likely qualify for OPR VMT screening proximity of future transit stations. Like the proposed Project, impacts would be less than significant.

Tribal Cultural Resources

Both Alternative C and the proposed Project would result in less than significant impacts to undiscovered tribal cultural resources, with mitigation incorporated.

Utilities and Service Systems

Alternative C would generate temporary increased demands upon utilities and service systems during construction, to a slightly lesser degree than the Project, given the reduced development buildout. During operations, this Alternative would result in proportionately less demand upon utilities and service systems compared to the Project. With this Alternative, there would be less demand upon utilities and service systems during construction and operations; impacts would be less than significant.

CONCLUSION

This Alternative proposes 60 fewer residences and a reduction of 110,000 SF in non-residential development (8.5 and 9.7 percent less, respectively) when compared to the Project. Impacts associated with Alternative C would be similar or slightly less than the proposed Project. However, it would not reduce the identified significant unavoidable impacts to a less than significant level but would reduce the impact to historic resources. The Alternative would meet all the RLASCSP objectives. This Alternative would allow for the same proposed uses as the proposed Project, to a slightly lesser degree. This Alternative would create a mixed-use, compact, and multi-modal environment, promote sustainable principles in design and development, enhance the pedestrian scale and function of the built environment, establish a complementary mix of cultural uses, public spaces, and outdoor activities, create stronger connections with local neighborhoods and connectivity with mobility options, promote a family-oriented, culturally enriched, healthy lifestyle, celebrate and reinforce Downey's and the Rancho Los Amigos South Campus' character and history, and enhance economic development successes in the area.

6.4.4 ALTERNATIVE D: MODIFIED LAND USE

Alternative D would change the Focus Area from a mix of residential, commercial, and retail to entirely residential uses. Alternative D would allow for 2,100 residential DUs (assuming the same 44 DU/AC density as the proposed Project) compared to 700 DUs and 1,130,000 SF of non-residential for the proposed Project. **Table 6-4: Comparison Between Proposed Project and Alternative D** shows the proposed land use changes and development changes compared to the proposed Project.

Table 6-4: Comparison Between Proposed Project and Alternative D

Description	Residential DU	Non-Residential SF	Developable Acres	Density
Proposed Project	700	1,130,000	47.8	44 DU/AC[1]
Alternative D: Modified Land Uses	2,100	0	47.8	44 DU/AC[1]
Difference	1,400	1,130,000	-	-
% Difference	+200%	-100%	-	-

1. Residential densities in the RLASCSP range from 40–75 DU/AC across the four sub-districts. The RLASCSP and this PEIR have assumed 44 DU/AC.

Source: Kimley Horn, 2021.

COMPARATIVE ANALYSIS OF ENVIRONMENTAL IMPACTS

Aesthetics

As with the proposed Project, Alternative D would not have a substantial adverse effect on a scenic vista and would not substantially damage scenic resources, and impacts would be less than significant. In addition, similar to the proposed Project, the Alternative would not conflict with applicable zoning and other regulations governing scenic quality, and the impact would be less than significant. Demolition of existing structures would result in significant impacts to the existing character. Implementation of mitigation identified for the proposed Project would reduce impacts on visual character associated with this Alternative to less than significant. Although the Focus Area would be used solely for residential use, the development footprint would remain the same as the proposed Project. Therefore, impacts related to light and glare would be similar.

Air Quality

Under this Alternative, no non-residential development would occur. Similar to the proposed Project, future development facilitated by Alternative D would occur over a period of 14 years. Project specific details are not available and therefore, future buildout of residential projects within the Focus Area could conflict with the applicable air quality plan and result in a considerable net increase of any criteria pollutant. This impact would be similar to the proposed Project. Under this Alternative, no odor impacts would occur, since residential development is not a land use that is typically associated with generation of odors. Air quality emission for the Alternative and the proposed Project are considered significant and unavoidable.

Biological Resources

Alternative B would have similar impacts to biological resources compared to the proposed Project because impacts would occur within the same development footprint area. Potential impacts to nesting birds and roosting bats can be mitigated to a less than significant level.

Cultural Resources

Although this Alternative proposes a different type of land use development, ground disturbing activities would still occur. Both Alternative D and the proposed Project would have significant and unavoidable impacts on historic resources. Even with the implementation of mitigation, impacts to the Historic District would remain significant and unavoidable. The potential for impacting undiscovered resources and human remains would be similar to the proposed Project. Impacts to undiscovered archaeological and paleontological resources and human remains would be less than significant with mitigation.

Energy

The energy usage during construction would be similar for both Alternative D and the proposed Project. The 47.8 acres of developable area within the Focus Area would be the same, therefore energy resources for construction would be similar despite the change in land. Future development would be subject to the same energy conservation regulations compared to the proposed Project. Consistent with the findings for the proposed Project, impacts associated with Alternative D would be less than significant.

Greenhouse Gas Emissions

Project-related GHG emissions would be significant and unavoidable. Similarly, Alternative D would result in significant and unavoidable impacts. The proposed Project and this Alternative would be subject to comply with the same policies and regulations related to reducing GHG emissions. Future residential projects would be subject to the CALGreen Code and Title 24 Building Code Requirements.

Hazards and Hazardous Materials

The potential construction-related impacts involving increased safety risk to workers due to the transport, handling, and disposal of hazardous materials and waste, which were considered to be less than significant with mitigation for the proposed Project, would be similar with this Alternative. The Project's potential construction-related impacts involving demolition of buildings or structures with asbestos or lead-based paint, which were considered to be less than significant with mitigation incorporated, would be the same under this Alternative since redevelopment would demolish the same structures. Although this Alternative would modify the land use plan for the Focus Area, future development would occur within the same Focus Area footprint. This Alternative would encounter similar impacts compared to the proposed Project.

Alternative D's potential operational impacts from transport, handling, and disposal of hazardous materials and waste would be less impactful compared to the proposed Project, since residential land uses typically do not transport, handle, or dispose of hazardous waste aside from typical household cleaning products and outdoor fertilizers. Under both development scenarios, impacts can be mitigated to a less than significant level.

Hydrology and Water Quality

Like the proposed Project, Alternative D would result in short-term effects on water quality. The land use change would result in similar construction and operation impacts related to the proposed Project. Surfaces would be impacted by truck hauling, mass grading, and earthwork, all of which would affect water quality and drainage patterns. Changes to hydrology and water quality impacts would be less than significant for both Alternative D and the proposed Project.

Land Use and Planning

Alternative D assumes the development of a single-use in the Focus Area. Neither the proposed Project nor this Alternative would divide an established neighborhood, as no residential neighborhoods currently exist within the Focus Area. Future development facilitated by this Alternative would be subject to comply with the DGP policies and plans and DMC standards. Impacts under both scenarios would be less than significant.

Noise

Construction and operational noise and vibration impacts with Alternative D would result in a less than significant impact with mitigation incorporated. This conclusion is consistent with the findings for the proposed Project. Neither the Alternative or the proposed Project would result in impacts related to proximity to airstrips or an airport land use plan.

Population and Housing

When compared to the proposed Project, Alternative D would provide more residences on the site: 2,100 residential DUs compared to 700 DUs. Therefore, this Alternative would result in more population growth in the area since residential development would increase by 200 percent. Neither the proposed Project nor this Alternative would displace existing housing. Under this Alternative, more residential units would be constructed, therefore, would also be in furtherance of meeting the City's RHNA allocation. Based on the number of units that would be constructed over the 14-year period, Alternative D could induce substantial population growth to the area.

Public Services and Recreation

Alternative D would increase the residential development capacity to 2,100 DUs, or 200 percent over the proposed Project. The substantial increase in residential uses would increase demand for fire, police, medical, schools, and library services, as well as parks and recreational facilities. The substantial residential growth within the Focus Area could strain those resources and future development projects facilitated by this Alternative. However, development is assumed to occur over a 14-year period and would be subject to payment of applicable fees.

Transportation

Project construction would result in less than significant impacts concerning emergency access. This Alternative would result in similar construction activities, therefore, would have similar potential to impact emergency access during construction.

Like the proposed Project, Alternative D proposes residential land uses in close proximity to the future Metro West Santa Ana Branch (WSAB)/Metro Project, specifically the proposed Gardendale Transit Station. However, given the 2,100 residential DUs expected at full buildout, this Alternative may not qualify for VMT Screening. According to the County of Los Angeles Traffic Impact Guidelines, residential projects would have a potentially significant VMT impact if residential VMT per capita would not be below the existing residential VMT per capita for the Baseline Area in which the project is located. The absence of commercial and retail land uses under this Alternative would not provide employment opportunities in the Focus Area. As a result, future residents may need to travel more miles to employment centers, therefore increasing VMT. This Alternative may result in significant impacts related to VMT when compared to the proposed Project.

Tribal Cultural Resources

Both Alternative D and the proposed Project would result in less than significant impacts to as yet undiscovered tribal cultural resources. Measures are proposed to mitigate potential impacts to a less than significant level.

Utilities and Service Systems

Both the proposed project and Alternative D would generate increased utilities and service system demands during operations. While the Alternative increases the number of residential uses, no non-residential development is proposed. Future projects facilitated by this Alternative may be required to construct new connections for utility service, or result in additional environmental impacts for utility infrastructure upgrades required to accommodate the future residential growth in the Focus Area. Under both development scenarios, no significant impacts are anticipated.

CONCLUSION

Alternative D would have similar environmental impacts as the proposed Project and would not fulfill the RLASCSP objectives. This Alternative would not create a mixed-use, compact, and multi-modal environment or establish a complementary mix of cultural uses, public spaces, and outdoor activities. This Alternative would propose a 200 percent increase in residential land uses and eliminate all non-residential land uses within the Focus Area. The absence of commercial retail land uses within the Focus Area would not support future employment opportunities, and therefore may increase regional VMT and not fulfill the purpose of the RLASP.

6.5 Environmentally Superior Alternative

According to State CEQA Guidelines §15126.6(e)(2), "No Project" Alternative, "If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." **Table 6-5**: **Comparison of Alternatives**, summarizes the comparative analyses presented above (i.e., the alternatives compared to the proposed Project). Because the environmentally superior Alternative is Alternative A: No Project/No Construction, the PEIR identifies Alternative C: Adaptive Reuse/Reduced Project is the environmentally superior Alternative.

Table 6-5: Comparison of Alternatives

Sections	Alternative A: No Project/ No Construction	Alternative B: No Project/ Existing Land Use Designation	Alternative C: Adaptive Reuse/Reduced Project	Alternative D: Modified Land Use
Aesthetics	⮟	⮝	⮟	=
Air Quality*	⮟	* =	* =	* =
Biological Resources	⮟	=	=	=
Cultural Resources*	⮟	* =	* =	* =
Energy	⮟	⮝	⮟	=
Greenhouse Gas Emissions*	⮟	* ⮝	* =	* =
Hazards and Hazardous Materials	⮟	⮝	=	=
Hydrology and Water Quality	⮟	=	=	=
Land Use and Planning	⮝	⮟	=	=
Noise	⮟	⮝	⮟	=
Population and Housing	⮟	⮟	⮝	⮝
Public Services and Recreation	⮟	⮟	⮟	⮝
Transportation	⮟	⮝	=	⮝
Tribal Cultural Resources	⮟	=	=	=
Utilities and Service Systems	⮟	⮟	⮟	=

⮝ Indicates an impact that is greater than the proposed Project (environmentally inferior).
⮟ Indicates an impact that is less than the proposed Project (environmentally superior).
= Indicates an impact that is equal to the proposed Project (neither environmentally superior nor inferior).
* Indicates a significant unavoidable impact.

7.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

The State CEQA Guidelines provide that an EIR shall focus on the significant effects on the environment, discussing the effects with emphasis in proportion to their severity and probability of occurrence. The environmental topics dismissed in an Initial Study (Environmental Checklist) as clearly insignificant and unlikely to occur need not be discussed further in the EIR unless information inconsistent with the finding of the Environmental Checklist is subsequently received.

California Public Resources Code (PRC) §21100 (c) states that an EIR shall contain a statement briefly indicating the reasons that a project's various possible significant effects were determined not to be significant and were, therefore, not discussed in detail in the Draft EIR (PRC § 21000 et. seq.). State CEQA Guidelines §15128 adds, "Such a statement may be contained in an attached copy of an Initial Study (Environmental Checklist)" (14 CCR 15000 et. seq.). The environmental topics included in the Initial Study (Environmental Checklist) prepared with the Notice of Preparation included determination of potential impact significance. The PEIR further evaluates all the Project's possible significant effects in accordance with State CEQA Guidelines.

The following section provides an analysis of potential Project impacts found to result in no impacts or less than significant impacts during the PEIR.

7.1 AGRICULTURAL AND FORESTRY RESOURCES

7.1.a Would project implementation 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 RLASCSP area, inclusive of the Focus Area is in an urban environment containing existing development as well as abandoned buildings and vacant properties. There are no agricultural uses within or immediately adjacent to the Specific Plan area, inclusive of the Focus Area. The National Resource Conservation Service has not mapped soils within the Specific Plan area; therefore, no soils in the area have been designated as agricultural soils. The California Department of Conservation's Farmland Mapping and Monitoring Program does not cover the Specific Plan area or surrounding properties; therefore, none of the land has been designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, Project implementation would not result in the conversion of Farmland and no impact would occur.

7.1.b Would project implementation conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Specific Plan area, inclusive of the Focus Area is not the subject of a Williamson Act Contract. As such, no lands under a Williamson Act contract are on or near the Focus Area. Historically, onsite agricultural uses began in the late 1880s and were moved off the site starting in 1926, and ultimately ended around 1957. Agricultural land was eventually developed and is no longer intact. Because there are no longer identified agricultural resources within the Specific Plan area, no direct or indirect impacts on agricultural resources would occur from Project implementation.

The proposed Project would not be located on land zoned by the City as forest land or timberland. The RLASCSP area is zoned Single-Family Residential (R-1 5,000), Rancho Business Center Specific Plan (SP 88-1), and Rancho Los Amigos Specific Plan (SP 85-1). As discussed, the Specific Plan area, inclusive of the Focus Area has not been designated Farmland, nor does the Project conflict with an existing Williamson Act contract. As a result of Project implementation, no land within the Focus Area would be converted to non-forest or nonagricultural use and no impact would occur.

7.1.c Would project implementation 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. As indicated, the RLASCSP area is currently zoned Single-Family Residential (R-1 5,000), Rancho Business Center Specific Plan (SP 88-1), and Rancho Los Amigos Specific Plan (SP 85-1). Therefore, Project implementation would not conflict with zoning for forestland or timberland. Additionally, there are no properties zoned as forest land, timberland, or timberland zoned Timberland Production areas (as defined in the PRC 12220(g) and PRC 4526 or Government Code 51104(g)). As a result of Project implementation, no land within the Focus Area would conflict with forest land, timberland, or timberland zoned Timberland Production and no impact would occur.

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

No Impact. Refer to Response 7.1.c above. Therefore, the Project would not impact forest land.

7.1.e Would project implementation 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. As discussed, the Specific Plan area, inclusive of the Focus Area is located within an urbanized area. As such, no Farmland or forestland is located within the Focus Area or in its immediate vicinity. Therefore, Project implementation would not involve changes in the existing environment which could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use and no impact would occur.

7.2 GEOLOGY AND SOILS

7.2.a Would project implementation 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; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; or (iv) landslides?

No Impact. The Focus Area is not located within a known Alquist-Priolo Earthquake Fault Zone and no active faults are known to cross the Focus Area. Additionally, the Focus Area is not mapped over the blind thrust plane or any other mapped fault zones. Therefore, there would be no potential for surface rupture. Future projects facilitated by Project implementation would be subject to construction plan reviews to verify compliance standard engineering practices and regulatory framework set forth in the 2019

California Building Code and through the City's development review process. Conformance with applicable regulations and building codes would ensure that risks from strong seismic ground shaking would be reduced to the maximum extent practicable, and the proposed Project would not exacerbate the likelihood of seismic events.

The RLASCSP area is approximately 20 miles inland from the Pacific Ocean and 6 miles from the Whittier Narrows Dam. Because of the distance from these locations and the presence of intervening development, the potential for tsunamis, inundation, seiches, and flooding is not a significant hazard. As a result, Project implementation would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction; or landslides and no impact would occur.

7.2.b Would project implementation result in substantial soil erosion or the loss of topsoil?

No Impact. Erosion occurs in developed, urbanized areas such as the Focus Area, mainly as a result of construction. The Project does not propose any construction, rather, it would facilitate development within the Focus Area. Prior to construction, future development, would be required to demonstrate compliance with established framework including National Pollutant Discharge Elimination System (NPDES) permits and applicable best management practices. As such, Project implementation would not result in substantial soil erosion or the loss of topsoil and no impact would occur.

7.2.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 implementation, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less than Significant. The Focus Area is not subject to landslides but is located in an area potentially subject to liquefaction. Liquefaction potential is greatest where the groundwater level if shallow and loose, fine sands, or silts occur within a depth of about 50 feet. The "modern" historic-high groundwater level is at a depth of approximately 30 feet below the existing grade. Future projects facilitated by Project implementation would be subject to construction plan reviews to verify compliance standard engineering practices and regulatory framework set forth in the 2019 California Building Code and DMC Chapter 1, *Downey Building Code*. As a result, impacts associated with on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse as a result of unstable soil would be less than significant.

7.2.d Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

No Impact. The Focus Area is not within an area of known subsidence associated with fluid withdrawal, A, therefore future development facilitated by the proposed Project would not be located on expansive soil. Future development facilitated by the proposed Project would be required to comply with regulatory framework set forth in the 2019 California Building Code and DMC Chapter 1, *Downey Building Code*. Due to the existing conditions, Project implementation would not create substantial risks to life or property and no impact would occur.

7.2.e Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Project does not propose direct development that would result in an increased demand for wastewater disposal systems. However, future development facilitated by the Project would require connections to the existing conveyance system and treatment at the JWPCP. The Specific Plan area, inclusive of the Focus Area is located in an urbanized area and would not require or result in the relocation or construction of new or expanded wastewater facilities; see **Section 4.15, Utilities and Service Systems**. All future development would be subject to the City's development review process and would be required to demonstrate consistency with DMC requirements. Therefore, no impact would occur.

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

No Impact. The Focus Area is flat with no unique geological features. Potential effects to paleontological resources are addressed in **Section 4.4, Cultural Resources**.

7.3 MINERAL RESOURCES

7.3.a Would project implementation 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. There are no known mineral resources of statewide or regional importance located within the Focus Area. There are no active mines or mining districts near the Focus Area. Therefore, the proposed Project would not be expected to result in the loss of availability of a known mineral resource. Due to the existing conditions, Project implementation would not result in the loss of availability of a locally important mineral resource recovery site and no impact would occur.

7.3.b Would project implementation 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. There are no known mineral resource recovery sites of local importance within the Focus Area. The City of Downey General Plan (DGP) does not identify the Focus Area as a locally-important mineral resource recovery site. Therefore, Project implementation would not be expected to result in the loss of availability of a locally important mineral resource recovery site as delineated on a local general plan, specific plan, or other land use plan and no impact would occur.

7.4 WILDFIRE

If located in or near state responsibility areas or land classified as very high fire hazard severity zones:

7.4.a Would project implementation substantially impair an adopted emergency response plan or emergency evacuation plan?

7.4.b Would project implementation, 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?

7.4.c Would project implementation 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

7.4.d Would project implementation expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. As discussed in **Section 4.7, Hazard and Hazardous Materials**, the Focus Area is not located within an area designated as a very high fire hazard severity area. There are no streets that are designated Disaster Routes within or adjacent to the Focus Area. The Focus Area is bordered by development in an urbanized area of the City. The future projects facilitated by Project implementation would tie into existing infrastructure that currently serves the Focus Area. Future development facilitated by the Project would be required to adhere to 2019 California Fire Code and DMC Chapter 3, *Fire Code,* as well as Chapter 1, *Downey Building Code*, as discussed in **Section 4.12, Public Services and Recreation**. Therefore, Project implementation would not interfere with emergency response or evacuation plans during wildfires, exacerbate wildfire risks, require the installation of wildfire prevention infrastructure, or expose people or structures to post-fire flooding or landslides and no impact would occur during temporary construction of the proposed Project, temporary demolition of additional structures on the South Campus, and long-term operation of the proposed Project.

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