



May 31, 2023

City of Santa Fe Springs  
Planning Department  
11710 E. Telegraph Road  
Santa Fe Springs, CA 90670

**Subject: Addendum to the Santa Fe Springs General Plan and Targeted Zoning Code Update Environmental Impact Report (SCH# 2021050193) (General Plan Update EIR) Comparing the impacts of the Florence & Norwalk Industrial Project (Project) impacts vs. Koontz Site commercial/business park impacts.**

Applied Planning, Inc. is pleased to present this Addendum and supporting technical analyses substantiating that the proposed Florence & Norwalk Industrial Project (Project) would not result in environmental impacts substantially greater than or different from impacts identified and addressed in *Santa Fe Springs General Plan and Targeted Zoning Code Update Environmental Impact Report (SCH# 2021050193) (General Plan Update EIR)*.

As presented at *CEQA Guidelines* Section 15164, an Addendum to a Certified EIR may be prepared if only minor technical changes or additions are necessary and none of the conditions described in Section 15162, calling for the preparation of a subsequent or supplemental EIR, have occurred. Further, Public Resources Code Section 21166 prohibits preparation of a subsequent or supplemental EIR for a Certified EIR unless substantial project changes are proposed requiring major revisions to the Certified EIR; a substantial change in circumstances has occurred requiring major revisions to the Certified EIR; or new information becomes available requiring major revisions to the Certified EIR. As supported by the information provided here, none of these conditions apply to the Project. This Addendum to the Certified EIR fulfills CEQA documentation requirements for the Project; no further environmental analysis is required.

## **1.0 OVERVIEW**

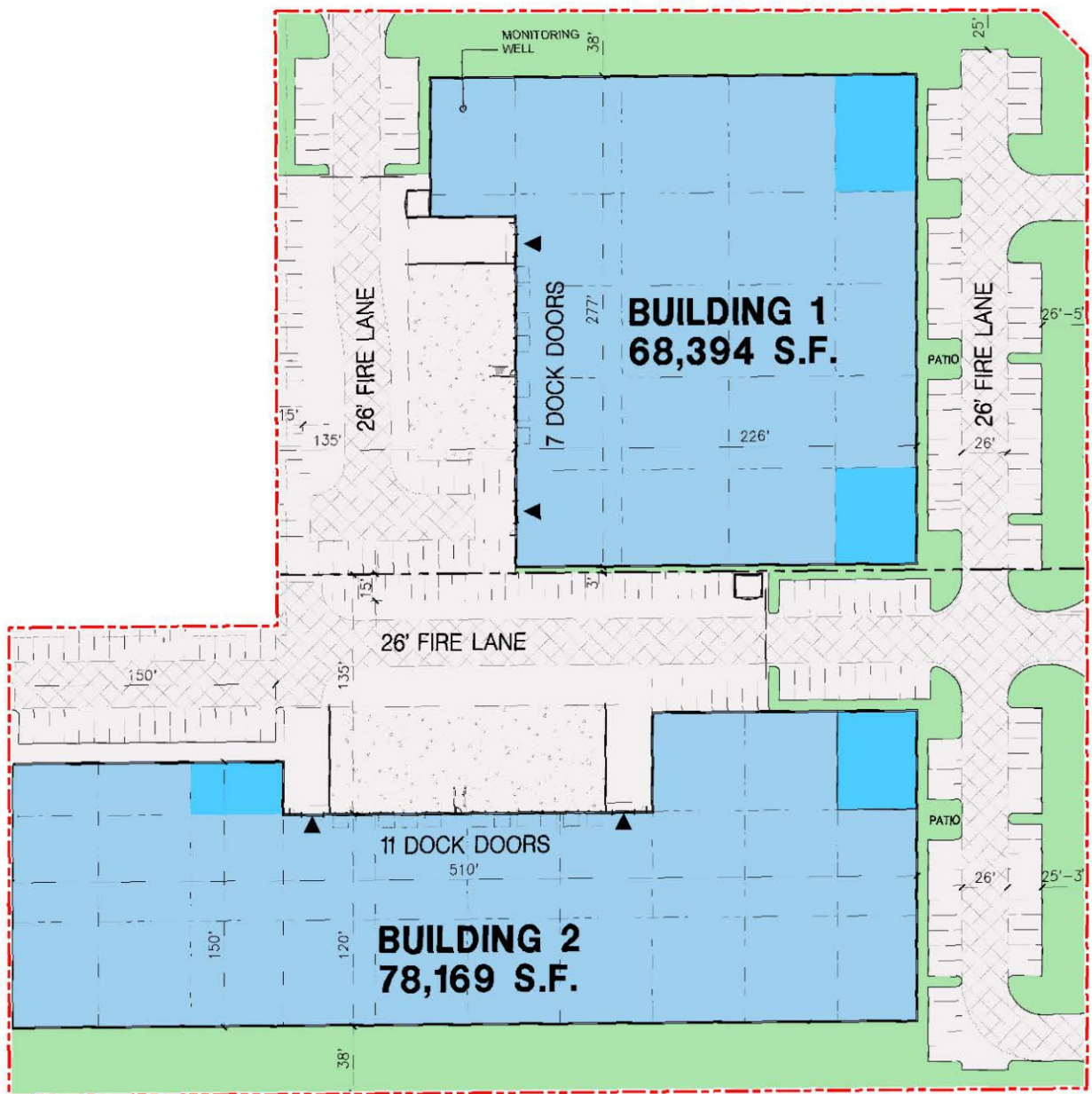
The proposed Florence & Norwalk Industrial Project (Project) comprises approximately 146,563 square feet of light industrial warehouse uses configured as two buildings within an approximately 7.26-acre Project site. The Project site is located at the southwest corner of Florence Avenue and Norwalk Boulevard in the northwest portion of the City of Santa Fe Springs. Please refer to Figure 1.1-1, *Project Location* and Figure 1.1-2, *Project Development Concept*.



NOT TO SCALE

Source: Google Earth; Applied Planning, Inc.

Figure 1.1-1  
Project Location



NOT TO SCALE  
Source:



The Project site comprises a portion of the “Koontz Site,” a Key Opportunity Site<sup>1</sup> that was specifically evaluated as part of the General Plan Update EIR. The General Plan Update EIR provides the following summary description of existing uses within, and anticipated development of, the Koontz Site:

[The Koontz Site] is located between Lakeland Road, Norwalk Boulevard, Fulton Wells Avenue, and Florence Avenue. A conceptual design for this site evaluated the replacement of existing industrial properties with up to 156 residential units and 110,500 square feet of commercial or business park development within multiple one- to three-story buildings. Residential development will consist of tuck-under residential building types at three stories in height. Commercial development will consist of a neighborhood shopping center with retail, commercial services, and restaurants located at the property on the southwest corner of Florence Avenue and Norwalk Boulevard. The conceptual design includes a shopping center with multiple retail pads and an anchor store with a height of 25 feet assuming a C-1 zone (C-4 zone would allow up to 75 feet). The commercial use could also be a business park development depending on market conditions (General Plan Update EIR, p. 3-26).

The approximately 146,563 square feet of light industrial warehouse uses proposed by the Project would be constructed in place of the 110,500 square feet of commercial/business park development anticipated for development within the Koontz Site. The analysis provided here compares impacts of the Project with impacts of the anticipated development of the Koontz Site commercial/business park uses as presented in the General Plan Update EIR.

It is noted here, that although the Project uses at 146,563 square feet represents a relative increase in building area when compared to the Koontz Site commercial/business park uses at 110,500 square feet, the relative intensity of impacts resulting from development of the site under the Project would likely be reduced, especially given that the site was

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<sup>1</sup> The Koontz Site is one of four Key Opportunity Sites that were the subject of focused analyses in the General Plan Update EIR.

also analyzed for retail uses which have significant more trip generation. In this respect, trip generation (traffic) is a proxy that broadly correlates with relative impacts of conventional urban infill development proposals, such as the Project. More specifically, development-related trip generation is the predominant source of transportation, vehicle miles traveled (VMT), air quality, and greenhouse gas (GHG) impacts resulting from conventional urban infill projects.

As substantiated in this analysis, trip generation under the Project would be reduced when compared to trip generation of the Koontz Site commercial/business park uses. As a consequence, transportation, vehicle miles traveled (VMT), air quality, and greenhouse gas (GHG) impacts would be reduced under the Project, and other impacts would not be substantially different than or greater than those resulting from development of the Koontz Site commercial/business park uses. Further discussion in these regards is presented herein at Section 3.0, *Environmental Issues - Comparative Summaries*.

## **2.0 SUPPORTING TECHNICAL ANALYSES**

Technical analyses supporting the discussions presented here include:

- *Florence and Norwalk Air Quality & Greenhouse Gas Assessment* (Urban Crossroads, Inc.) July 14, 2022 (Project AQIA/GHGA);
- *Florence and Norwalk Noise and Vibration Impact Analysis* (Urban Crossroads, Inc.) July 18, 2022 (Project Noise Analysis); and
- *Florence and Norwalk Vehicle Miles Traveled (VMT) Screening Evaluation* (Urban Crossroads, Inc.) June 21, 2022 (Project VMT Assessment).
- *Phase I Environmental Site Assessment for 10801-10859 Norwalk Boulevard, 10819-10858 Koontz Avenue, and 12120 E. Florence Avenue, Santa Fe Springs, CA 90670* (Langan Engineering & Environmental Services, Inc.) April 7, 2022.
- *Phase II Environmental Site Investigation, 10801-10859 Norwalk Blvd, 10819-10858 Koontz Ave and 12120 Florence Ave, Santa Fe Springs, CA 90670* (Langan Engineering & Environmental Services, Inc.) April 8, 2022.

All Project technical analyses are appended to this Addendum.

### **3.0 ENVIRONMENTAL ISSUES - COMPARATIVE SUMMARIES**

The following discussions summarize and compare potential “Non-Operational” Impacts” and “Operational Impacts” resulting from the Project (the Project Scenario) with impacts that would result from buildout of the City as discussed in the General Plan Update EIR (the General Plan Update Scenario). The focus here is comparative impacts that would result from development of the Project uses vs. impacts that would result from development of the Koontz Site commercial/business park uses as reflected in the General Plan Update EIR. Addendum Attachment A presents a summary of all mitigation presented in the Certified EIR and the applicability of those measures to the Project.

#### **3.1 “Non-Operational” Impacts**

Non-operational impacts broadly encompass impacts that derive primarily from the location or context of a given project, rather than that project’s design, occupancy, or operational features. CEQA considerations that can be typically characterized as non-operational topics include:

- Agriculture and Forestry Resources;
- Biological Resources;
- Historic and Cultural and Tribal Cultural Resources;
- Geology and Soils;
- Land Use and Planning;
- Mineral Resources;
- Wildfire.

The Project and General Plan Update development scenarios would affect the same site, and both scenarios are qualitatively comparable, representing permitted or conditionally urban development of similar intensity in varying configurations.

For non-operational environmental considerations, the General Plan Update EIR determined that buildout of the City, including buildout of the City’s Key Opportunity

Sites, would have no impact, or impacts would be less-than-significant. For non-operational environmental considerations, site and context of the Project scenario is not substantially different than conditions evaluated under the General Plan Update EIR. Analysis of the Project's effects would therefore yield little or no differentiation in non-operational environmental impacts when compared to impacts identified in the General Plan Update EIR. On this basis, under the topics listed below, the Project and General Plan Update scenarios would result in comparable environmental impacts. Under the listed topics, the Project scenario and the General Plan Update Scenario would have no discernible environmental impact, or impacts would be less-than-significant.

- Agriculture and Forestry Resources;
- Biological Resources;
- Historic and Cultural and Tribal Cultural Resources;
- Geology and Soils;
- Land Use and Planning;
- Mineral Resources;
- Wildfire.

### **3.2 Operational Impacts**

In contrast to the non-operational impacts evaluated above, "operational impacts" are dependent on a given project's design, occupancy, and/or operational features. CEQA considerations that can be typically characterized as "operational" topics include:

- Aesthetics;
- Air Quality;
- Energy;
- Greenhouse Gas Emissions;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality;
- Noise;
- Population and Housing;
- Public Services;
- Recreation;



- Transportation; and
- Utilities and Service Systems.

Design, occupancies, and operational aspects of the Project scenario and the General Plan Update scenario vary to some degree, and could result in varying operational environmental impacts. For each of the CEQA “operational topics” listed above, the following discussions summarize potential differences in impacts that would result from the Project scenario, and the General Plan Update Scenario.

### **3.2.1 Aesthetics**

An analysis of potential aesthetic impacts is provided at General Plan Update EIR Section 4.1, *Aesthetics*. The General Plan Update EIR concluded that buildout of the City, including development of the City’s Key Opportunity Sites, would have no impacts or less-than-significant impacts related to aesthetics/light and glare. The Project would implement allowed contemporary industrial park uses that would conform to City design and development standards, and does not propose or require uses or activities that would substantially alter any of the conclusions of the General Plan Update EIR.

When compared to the General Plan Update EIR analyses, no new or substantially increased aesthetic/light and glare impacts would occur under the Project. No further analysis is required for the Project.

### **3.2.2 Air Quality**

Potential air quality impacts are addressed at General Plan Update EIR Section 4.3, *Air Quality*. The General Plan Update EIR determined that buildout of the City including development of the City’s Key Opportunity Sites, would result in significant and unavoidable impacts concerning conflict with applicable Air Quality Management Plan (AQMP); cumulatively considerable increases to non-attainment conditions; exposure of sensitive receptors to substantial pollutant concentrations; and substantial adverse cumulative air quality impacts generally (General Plan Update EIR, pp. 2-11 – 2-15).<sup>2</sup>

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<sup>2</sup> The City of Santa Fe Springs has previously adopted Findings of Fact and Statement of Overriding Considerations addressing these significant impacts. See: *General Plan and Targeted Zoning Code Update*

As substantiated in the Project AQIA/GHGA (Attachment B), the Project uses would result in a net reduction in air pollutant emissions when compared to emissions that would be generated by commercial/business park development of the Koontz Site as envisioned under the General Plan Update EIR. The Project AQIA/GHGA discussions substantiate further that the Project uses would not result in exceedance of applicable South Coast Air Quality Management District (SCAQMD) criteria pollutant emissions significance thresholds. A summary comparison of air pollutant emissions that would be generated by the Project and air pollutant emissions that would be generated by the development of the Koontz Site as envisioned under the General Plan Update EIR is presented at Table 3.2-1.

**Table 3.2-1**  
**Comparative Air Pollutant Emissions**  
**Project Uses vs. Koontz Site Commercial/Business Park Uses**

Source	Emissions (lbs/day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Summer</b>						
Project	11.79	4.12	56.18	0.07	2.24	0.49
Koontz Site Commercial/Business Park Uses	23.44	15.42	169.95	0.34	11.72	2.29
Net Emissions (Proposed – Current)	-11.65	-11.30	-113.77	-0.27	-9.48	-1.80
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
<b>Winter</b>						
Project	9.70	4.31	40.94	0.07	2.22	0.47
Koontz Site Commercial/Business Park Uses	22.36	16.88	153.15	0.33	11.71	2.28
Net Emissions (Project – Current)	-12.66	-12.57	-112.21	-0.26	-9.49	-1.81
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

**Source:** *Florence and Norwalk Air Quality & Greenhouse Gas Assessment* (Urban Crossroads, Inc.) July 14, 2022.

When compared to the air pollutant emissions that would be generated by the Koontz Site uses reflected in the General Plan Update EIR analyses, no new or substantially increased air quality impacts would occur under the Project. Moreover, air quality impacts would be diminished under the Project. None of the significant air quality impacts noted in the General Plan Update EIR would occur under the Project. No further analysis is required for the Project.

### **3.2.3 Energy**

Potential energy impacts are addressed at General Plan Update EIR Section 4.6, *Energy*. The General Plan Update EIR analyses concluded that buildout of the City, including development of the City's Key Opportunity Sites, would result in less-than-significant energy impacts (General Plan Update EIR pp. 4.6-14 – 4.6-20).

The Project proposes development comparable in design and intensity to development of the Koontz Site uses as evaluated in the General Plan Update EIR. The Project does not propose or require uses or operations that would substantially increase energy consumption when compared to the Koontz Site uses as evaluated in the General Plan Update EIR. Further, the Project would reduce GHG emissions when compared to GHG emissions generated by the Koontz Site uses. This comparative reduction in GHG emission is a byproduct of comparative reductions in energy consumption that would result from the Project. Please refer to related discussions presented below at Section 3.2.4, *Greenhouse Gases*. The Project would likely reduce energy impacts when compared to energy impacts of the Koontz Site uses as evaluated in the General Plan Update EIR.

When compared to the General Plan Update EIR analyses, no new or substantially increased energy impacts would occur under the Project. Moreover, in comparison to the Koontz Site uses, energy impacts would likely be diminished under the Project. No further analysis is required for the Project.

### **3.2.4 Greenhouse Gases**

Potential greenhouse gas impacts are addressed at General Plan Update EIR Section 4.8, *Greenhouse Gases*. The General Plan Update EIR determined that buildout of the City, including development of the City's Key Opportunity Sites, would result in GHG

emissions that would directly or indirectly have a significant impact on the environment; and GHG emissions that would conflict with an plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The General Plan Update EIR concluded that these are significant and unavoidable impacts (General Plan Update EIR, pp. 2-15 – 2-19).<sup>3</sup>

As substantiated in the Project AQIA/GHGA (Attachment B), the Project uses would result in a net reduction in GHG emissions when compared to emissions that would be generated by commercial/business park development of the Koontz Site as envisioned under the General Plan Update EIR. The Project AQIA/GHGA discussions substantiate further that the Project uses would not result in exceedance of applicable SCAQMD GHG emissions significance thresholds. A summary comparison of GHG pollutant emissions that would be generated by the Project and GHG emissions that would be generated by the development of the Koontz Site as envisioned under the General Plan Update EIR is presented at Table 3.2-2.

**Table 3.2-2**  
**Comparative GHG Emissions**  
**Project Uses vs. Koontz Site Commercial/ Business Park Uses**

Development Scenario	Total MTCO <sub>2e</sub> /yr
Project	1,517.03
Koontz Site Commercial/Business Park Uses	4,998.45
(Project – Current)	-3,481.42

**Source:** *Florence and Norwalk Air Quality & Greenhouse Gas Assessment* (Urban Crossroads, Inc.) July 14, 2022.

When compared to the GHG emissions that would be generated by the Koontz Site uses reflected in the General Plan Update EIR analyses, no new or substantially increased air quality impacts would occur under the Project. Moreover, air quality impacts would be diminished under the Project. None of the significant air quality impacts noted in the General Plan Update EIR would occur under the Project. No further analysis is required for the Project.

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<sup>3</sup> The City of Santa Fe Springs has previously adopted Findings of Fact and Statement of Overriding Considerations addressing these significant impacts. See: *General Plan and Targeted Zoning Code Update Findings of Fact and Statement of Overriding Considerations*, City of Santa Fe Springs, January 24, 2022. See: <https://www.reimaginesantafesprings.org/files/managed/Document/174/FindingsofFactandSOC.pdf>

### **3.2.5 Hazards and Hazardous Materials**

Potential hazards and hazardous materials impacts are addressed at General Plan Update EIR Section 4.9, *Hazards and Hazardous Materials*. The General Plan Update EIR concluded that buildout of the City, including development of the City's Key Opportunity Sites, would result in less-than-significant impacts related to hazards or hazardous materials (General Plan Update EIR, pp. 4.9-28 – 4.9-38). The General Plan Update EIR notes however, that due to previous industrial development of the Key Opportunity Sites, there may be the potential for these sites to be affected by existing hazardous conditions. Accordingly, the General Plan Update EIR recognizes that environmental site assessments may be required to determine "if sampling and laboratory testing of onsite soils and/or groundwater is necessary" (General Plan Update EIR, p. 4.9-29)

The Project proposes development comparable in design and intensity to development of the Koontz Site uses as evaluated in the General Plan Update EIR. The Project does not propose uses or occupancies that would be considered inherently hazardous, or that would generate or require substantial use of hazardous materials.

The Koontz Site was previously occupied by industrial uses and the site may be affected by hazardous conditions associated with the site's previous industrial occupancies. Accordingly, and consistent with the General Plan Update EIR requirements noted above, a Phase I Environmental Site Assessment (ESA) and Phase II Environmental Site Investigation (ESI) have been prepared for the Project site. Findings and conclusions of the Project site Phase I ESA and Phase II ESI are summarized below, and the Phase I ESA and Phase II ESI are presented in their entirety at Addendum Attachments E1 and E2.

#### **3.2.5.1 Phase I Environmental Site Assessment**

The Project site Phase I ESA (Phase I ESA) was completed in April 2022. The objective of the Phase I ESA was to identify the presence or likely presence, use, or release of hazardous substances or petroleum products that could adversely affect development on

the subject property. The Phase I ESA concluded that the Project site is affected or potentially affected by the following Recognized Environmental Conditions (RECs)<sup>4</sup>:

- **On-site abandoned oil pipelines.** Historic records indicate the presence of abandoned oil lines in the northwest portion of the Project site. There is no record of the removal or assessment of these oil lines. The potential presence of the abandoned oil lines at the northwest portion of the Project site and lack of documentation documenting the status of the oil lines constitutes a REC (Phase I ESA, p. 2).
- **Chlorinated solvent plume up-gradient from the Project site.** A solvent plume which contains trichloroethylene (TCE), tetrachloroethylene (PCE), and other chlorinated solvents was delineated in the northwest portion of the Project site. The known presence of a chlorinated solvent plume beneath Project site is considered a REC (Phase I ESA, p. 3). It appears this chlorinated solvent plume is from off-site sources and not from an onsite source.
- **Current and Historical Operations at the Project site.** The database listings for the Site document a history of industrial operations that involved the use, storage, and disposal of hazardous substances and petroleum products. Given the long history of industrial activity in the area, undocumented releases are likely to have occurred, and have the potential to impact development and occupancy of the Project site. Therefore, the current and historical industrial activity at the Project site, as indicated in the regulatory listings, is considered a REC (Phase I ESA, p. 3).
- **Staining observed during Project site reconnaissance.** During Project site reconnaissance, abundant oil-like staining was observed throughout. Additionally, open containers of waste oil were observed throughout the property.

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<sup>4</sup> American Society for Testing and Materials (ASTM) standard 1527-21 states that RECs comprise “(1) the presence of *hazardous substances* or *petroleum products* in, on, or at the *subject property* due to a *release to the environment*; (2) the likely presence of *hazardous substances* or *petroleum products* in, on, or at the *subject property* due to a *release or likely release to the environment*; or (3) the presence of *hazardous substances* or *petroleum products* in, on, or at the *subject property* under conditions that pose a *material threat of a future release to the environment*.”



The concrete pavement was observed cracked and weathered in multiple areas of the Project site. The proximity of staining on/near cracked concrete could lead to potential impacts to the soil and groundwater, and is therefore considered a REC (Phase I ESA, p. 3).

The Phase I ESA also identifies one Controlled REC<sup>5</sup>, and four Business Environmental Risks (BERs)<sup>6</sup> affecting the Project site:

### **CREC**

- **Former LUST at northeast corner of Project site.** The Phase I ESA identified a petroleum release originating from an underground storage tank (LUST) that was previously located at the northeast corner of the Project site.<sup>7</sup> Total petroleum hydrocarbons (TPH) concentrations from this petroleum release were measured as part of the Phase I ESA. Certain of the measured TPH concentrations exceeded regulatory screening levels. TPH concentrations exceeding regulatory screening levels are considered a CREC (Phase I ESA, p. 3) because no additional remediation is required.

### **BERs**

- **Historic agricultural use at the Site.** Review of site aerial photographs indicates the Project site was used for agricultural purposes from the mid 1890's to the 1950's. As a result of these past activities, the Project site soils may contain residual

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<sup>5</sup> Per ASTM standard 1527-21, a Controlled REC (CREC) is defined as follows:

"A recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls)."

<sup>6</sup> Per ASTM standard 1527-21, a Business Environmental Risk (BER) is defined as follows: "A risk that can have a material environmental or environmental-driven impact on business associated with the current or planned use of a parcel of commercial real estate."

<sup>7</sup> The LUST was removed in 1998, and the facility received a closure letter from the Santa Fe Fire Department (Phase I ESA, p. 3).

pesticides, herbicides, and heavy metals such as lead and arsenic or other chemicals result. This potential soils contamination comprises a BER (Phase I ESA, p. 3).

- **Possible Lead Based Paint (LBP) and Asbestos Containing Material (ACM) at the Site:** Review of site aerial photographs indicates existing vacant buildings within the Project site were constructed in the 1960's and 1970's. Due to the age of these buildings, there is a possible presence of lead-based paint (LBP) and asbestos containing material (ACM) throughout the Project site. Potential presence LBP and ACM at the Project site comprises a BER.
- **Two abandoned oil production wells located at the Project site:** California Geologic Energy Management Division's (CalGEM) online mapping indicates two abandoned oil production wells. One abandoned oil production well is located at the southeastern portion of the Project site, and the other well is located at the northwestern portion of the Project site. Both wells are listed as plugged and abandoned. However, residual hydrocarbon could remain in the soil from previous oil and gas production activities, making this a BER. Additionally, the wells were abandoned in 1974 and 2000 respectively under the standards in place at that time, and may be required to be re-abandoned according to current well abandonment standards.
- **Santa Fe Springs Methane Zone Designation:** The City of Santa Fe Springs Methane Zone Map indicates that the Project site is within 500 feet of an oil/natural gas well, and therefore within a Methane Zone. Methane Zones represent areas of potential methane accumulation under buildings. Per City of Santa Fe Springs Municipal Code § 117.131 *Requirement for a Soils Gas Study or Methane Mitigation System*, any property within a Methane Zone is subject to a soil gas investigation when there is a change in ownership or when new construction is planned. The location of the Project site within a methane zone is identified as a BER.

### **3.2.5.2 Phase II Environmental Site Investigation**

Refining findings of the Phase I ESA, a Phase II Environmental Site Investigation (Phase II ESI) was completed in April 2022. The Phase II ESI further evaluates the Recognized

Environmental Conditions (RECs) and Business Environmental Risks (BERs) identified in the prior Phase I ESA, discussed above at Section 3.2.5.1.

The Phase II ESI concluded that within the project site, certain measured levels of chlorinated solvents, petroleum hydrocarbon compounds, and metals exceeded applicable screening levels. Soil samples exceeded screening levels for petroleum compounds in one soil boring located in the northeast corner of the Project Site. Soil vapor samples throughout the Project site exceeded applicable screening levels for hydrocarbon compounds and chlorinated solvents including 1-DCA, benzene, chloroform, and ethylbenzene, PCE, TCE and vinyl chloride. The measured concentrations of these constituents of concern in soil vapor are highest in the northwest corner of the Project site and chlorinated solvents in appear to increase with depth (Phase II ESI, p. 12). These chlorinated solvents appear to have originated from offsite sources, and are more significant offsite and upgradient from this site.

Additionally, groundwater samples exceeded screening levels for hydrocarbon compounds, chlorinated solvents, and metals. Chlorinated solvents and hydrocarbon compounds exceedances were measured in groundwater samples with concentrations generally decreasing towards the southeast. The chlorinated solvents appear to have migrated onto the site from upgradient sources. Metal exceedances were observed only in monitoring wells located in the western side of the Project site (Phase II ESI, p. 12).

### **Summary and Recommendations**

Based on findings of the Phase I ESA and Phase II ESI, the Project site is considered to be affected by known or probable RECs and BERs, primarily from offsite sources. The Applicant, in consultation with the City and the California Department of Toxic Substances (DTSC) is developing a Removal Action Plan Workplan (RAW) that would address the identified RECs and BERs.

The implemented RAW as approved by the City and DTSC and would ensure that the Project site is, at a minimum, remediated to Industrial Occupancy Standards, thereby precluding potentially adverse effects associated with development and occupancy of the Project site. In so doing, the implemented RAW would address existing potentially

hazardous conditions at the site in compliance with all applicable law and be protective of the downgradient community. This is consistent with and supports General Plan Policies including:

- **Policy S-3.7: Contamination Remediation.** Consult with the U.S. Environmental Protection Agency and responsible State agencies on the ongoing remediation and cleanup of contaminated properties and groundwater, with aim to recondition sites for productive land uses.
- **Policy LU-3.7: Contaminated Land Remediation.** Encourage the proper cleanup and remediation of lands that are contaminated, prioritizing cleanup near and within disadvantaged communities.

### **Project Conditions of Approval**

To ensure timely and effective hazards remediation at the Project site, it is recommended that the City impose the following or similar Conditions of Approval:

**HAZ-1** *In consultation with the City and DTSC, the Applicant shall prepare a Removal Action Workplan addressing RECs and BERs identified in the Project site Phase I ESA and Phase II ESI. The RAW shall be reviewed and approved by the City and DTSC prior to the issuance of the first Project development permit.*

**HAZ-2** *Prior to the issuance of the first Project Certificate of Occupancy (CO), the City and DTSC shall verify successful implementation of the approved RAW.*

Implementation of Conditions of Approval HAZ-1, HAZ-2 ensure Project conformance with General Plan recommendations and policies addressing cleanup and remediation of pre-existing hazardous conditions. Implementation of Conditions of Approval HAZ-1, HAZ-2 would also ensure that the potential for the Project to result in or exacerbate hazardous conditions is maintained at levels that would be less-than-significant.

When compared to hazards and hazardous materials impacts that would result from the Koontz Site uses reflected in the General Plan Update EIR analyses, no new or

substantially increased hazards and hazardous materials impacts would result from the Project. No further analysis is required for the Project.

### **3.2.6 Hydrology and Water Quality**

Potential hydrology and water quality impacts are addressed at General Plan Update EIR Section 4.10, *Hydrology and Water Quality*. The General Plan Update EIR determined that buildout of the City, including development of the City's Key Opportunity Sites, could result in potentially significant impacts related to water supply and water supply management. Mitigation Measure UTL-1 included in the General Plan Update EIR would reduce this impact to levels that would be less-than-significant. All other potential hydrology and water quality impacts resulting from buildout of the City would be less-than-significant (General Plan Update EIR pp. 4.10-14 – 4.10-22).

The Project proposes development comparable in design and intensity to development of the Koontz Site uses evaluated in the General Plan Update EIR. Further, the Project would be required to implement and maintain stormwater management systems and facilities pursuant to an approved Water Quality Management Plan (WQMP). The implemented WQMP would effectively minimize or negate impacts on a long-term basis. The Project does not propose uses or occupancies that would result in a substantially increased or different hydrology and water quality impacts than those evaluated in the General Plan Update EIR. The Project would be required to implement General Plan Update EIR Mitigation Measure UTL-1, ensuring that potential Project impacts related to groundwater recharge and basin groundwater management would be maintained at levels that would be less-than-significant. Mitigation Measure UTL-1 is presented at Attachment A, *Mitigation Summary*.

When compared to hydrology and water quality impacts that would result from the Koontz Site uses reflected in the General Plan Update EIR analyses, no new or substantially increased hydrology and water quality impacts would result from the Project. No further analysis is required for the Project.

### 3.2.7 Noise and Vibration

Potential noise and vibration impacts are addressed at General Plan Update EIR Section 4.13, *Noise*. The General Plan Update EIR concluded that buildout of the City, including development of the City’s Key Opportunity Sites would result in less-than-significant noise and vibration impacts (General Plan Update EIR, pp. 4.13-27 – 4.13-54). The Project proposes development comparable in design and intensity to development of the Koontz Site uses evaluated in the General Plan Update EIR and on this basis the Project would result in less-than-significant noise and vibration impacts similar to those identified in the General Plan EIR. The above conclusions regarding the Project noise and vibration impacts are further substantiated in the Project Noise Analysis (Attachment C). Project Noise Analysis conclusions regarding Project noise and Project vibration impact significance are summarized at Tables 3.2-3, 3.2-4, 3.2-5. The modeled receptors locations noted in the Tables are illustrated at Figure 3.2-1.

**Table 3.2-3**  
**Project Operational-Source Noise Impacts**

Receiver Location	Project Operational Noise Levels (dBA Leq)		Noise Level Standards (dBA Leq)		Noise Level Standards Exceeded?	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	39.6	39.6	55.0	45.0	No	No
R2	35.2	35.0	55.0	45.0	No	No
R3	38.4	38.3	55.0	45.0	No	No
R4	38.5	38.3	55.0	45.0	No	No

**Source:** Florence and Norwalk Noise and Vibration Impact Analysis (Urban Crossroads, Inc.) July 18, 2022

**Notes:** Project incremental noise contributions under all circumstances would be less than 1.0 dBA, and would be imperceptible.

**Table 3.2-4**  
**Project Construction-Source Noise Impacts**

Receiver Location	Construction Noise Levels (dBA Leq)		
	Highest Construction Noise Levels	Threshold	Threshold Exceeded?
R1	61.4	80	No
R2	55.1	80	No
R3	42.3	80	No
R4	42.6	80	No

**Source:** Florence and Norwalk Noise and Vibration Impact Analysis (Urban Crossroads, Inc.) July 18, 2022

**Notes:** Project incremental noise contributions under all circumstances would be less than 1.0 dBA, and would be imperceptible.



**Table 3.2-5**  
**Project Construction-Source Vibration Impacts**

Receiver	Typical Construction Vibration Levels PPV (in/sec)					Thresholds PPV (in/sec)	Thresholds Exceeded?
	Small bulldozer	Jackhammer	Loaded Trucks	Large bulldozer	Highest Vibration Level		
R1	0.002	0.020	0.044	0.052	0.052	0.3	No
R2	0.000	0.003	0.007	0.008	0.008	0.3	No
R3	0.000	0.001	0.002	0.002	0.002	0.3	No
R4	0.000	0.000	0.001	0.001	0.001	0.3	No

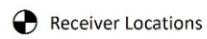
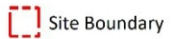
**Source:** *Florence and Norwalk Noise and Vibration Impact Analysis* (Urban Crossroads, Inc.) July 18, 2022

**Notes:** The Project does not propose or require uses or facilities that would be substantial sources of long-term vibration.

When compared to noise and vibration impacts that would result from the Koontz Site uses reflected in the General Plan Update EIR analyses, no new or substantially increased noise and vibration impacts would result from the Project. No further analysis is required for the Project.



**LEGEND:**



—●— Distance from receiver to Project site boundary (in feet)



NOT TO SCALE  
Source: Urban Crossroads, Inc.

Figure 3.2-1  
Noise Receptor Locations

### **3.2.8 Population and Housing**

Potential population and housing impacts are addressed at General Plan Update EIR Section 4.14, *Population and Housing*. The General Plan Update EIR concluded that buildout of the City, including development of the City's Key Opportunity Sites would result in less-than-significant impacts related to population and housing (General Plan Update EIR, pp. 4.14-4 – 4.14-8).

When compared to the Koontz Site uses, the Project light industrial/warehouse uses are comparable in intensity and character and would therefore not result in substantially different or substantially increased population and housing impacts. The Project would therefore not substantially alter any of the conclusions of the General Plan Update EIR regarding population and housing impacts. No further analysis is required for the Project.

### **3.2.9 Public Services**

Potential public services impacts are addressed at General Plan Update EIR Section 4.15, *Public Services*. The General Plan Update EIR concluded that buildout of the City, including development of the City's Key Opportunity Sites, would result in less-than-significant public services impacts (General Plan Update EIR, pp. 4.15-23 – 4.15-31).

When compared to the Koontz Site uses, the Project light industrial/warehouse uses are comparable in intensity and character and would therefore not result in substantially different or substantially increased public services impacts. The Project would therefore not substantially alter any of the conclusions of the General Plan Update EIR regarding public services impacts. No further analysis is required for the Project.

### **3.2.10 Recreation**

Potential recreation impacts are addressed at General Plan Update EIR Section 4.16, *Recreation*. The General Plan Update EIR concluded that buildout of the City, including development of the City's Key Opportunity Sites, would result in less-than-significant recreation impacts (General Plan Update EIR, pp. 4.16-8 – 4.16-10).

When compared to the Koontz Site uses, the Project light industrial/warehouse uses are comparable in intensity and character and would therefore not result in substantially different or substantially increased recreation impacts. The Project would therefore not substantially alter any of the conclusions of the General Plan Update EIR regarding recreation impacts. No further analysis is required for the Project.

### **3.2.11 Transportation**

Potential transportation impacts are addressed at General Plan Update EIR Section 4.17, *Transportation*. The General Plan Update EIR concluded that buildout of the City, including development of the City’s Key Opportunity Sites, would result in significant and unavoidable vehicle miles traveled (VMT) impacts (General Plan Update EIR, pp. 4.17-29 – 4.17-50).<sup>8</sup>

As substantiated in the Project VMT Assessment (Attachment D), the Project uses would result in a net reduction in trip generation when compared to trips that would be generated by the Koontz Site uses. The Project would therefore presumptively result in less-than-significant VMT impacts, and no further VMT analysis is required. For ease of reference, trip generation of the Project uses and the Koontz Site uses is presented at Table 3.2-6.

**Table 3.2-6  
Comparative Trip Generation  
Project Uses vs. Koontz Site Commercial/Business Park Uses**

Land Use	Quantity	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Koontz Site Commercial/ Business Park Uses	110,500 Square Feet							
Passenger Cars:		119	73	191	169	180	349	4,476
Total Truck Trips:		0	0	0	0	0	0	0
Total Trips		119	73	191	169	180	349	4,476
Project Uses	146,563 Square Feet							

<sup>8</sup> The City of Santa Fe Springs has previously adopted Findings of Fact and Statement of Overriding Considerations addressing these significant impacts. See: *General Plan and Targeted Zoning Code Update Findings of Fact and Statement of Overriding Considerations*, City of Santa Fe Springs, January 24, 2022. See: <https://www.reimaginesantafesprings.org/files/managed/Document/174/FindingsofFactandSOC.pdf>

**Table 3.2-6**  
**Comparative Trip Generation**  
**Project Uses vs. Koontz Site Commercial/Business Park Uses**

Land Use	Quantity	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Passenger Cars:		95	12	107	13	81	94	678
Total Truck Trips:		1	0	1	0	0	0	36
Total Trips		96	12	108	13	81	94	714
<b>Net Change:</b>								
Passenger Cars:		-24	-61	-84	-156	-99	-255	-3,798
Total Truck Trips:		1	0	1	0	0	0	36
<b>Net Total Trips (Passenger Cars + Truck Trips)</b>		<b>-23</b>	<b>-61</b>	<b>-83</b>	<b>-156</b>	<b>-99</b>	<b>-255</b>	<b>-3,762</b>

Source: Florence and Norwalk Vehicle Miles Traveled (VMT) Screening Evaluation (Urban Crossroads, Inc.) June 21, 2022.

The General Plan Update EIR concluded further that other transportation impacts resulting from buildout of the City, including buildout of the City's Key Opportunity Sites, would be less-than-significant (General Plan Update EIR, pp. 4.17-27 – 4.17-29).

When compared to the Koontz Site uses, the Project light industrial/warehouse uses are comparable in intensity and character and would therefore not result in substantially different or substantially transportation impacts. The Project would therefore not substantially alter any of the conclusions of the General Plan Update EIR regarding transportation impacts. No further analysis is required for the Project.

### 3.2.12 Utilities and Service Systems

Potential utilities and service systems impacts are addressed at General Plan Update EIR Section 4.19, *Utilities and Service Systems*. The General Plan Update EIR concluded that buildout of the City, including development of the City's Key Opportunity Sites, would result in potentially significant water supply and water supply management impacts. Mitigation Measure UTL-1 included in the General Plan Update EIR would reduce this impact to levels that would be less-than-significant. All other potential utilities and service systems impacts resulting from buildout of the City would be less-than-significant (General Plan Update EIR, pp. 4.19-16 – 4.19-28).

The Project proposes development comparable in design and intensity to development of the Koontz Site uses evaluated in the General Plan Update EIR. The Project does not propose uses or occupancies that would result in a substantially increased or different utilities and service systems impacts than those evaluated in the General Plan Update EIR. The Project would be required to implement General Plan Update EIR Mitigation Measure UTL-1, ensuring that potential Project impacts related to water supply and water supply management would be maintained at levels that would be less-than-significant. Mitigation Measure UTL-1 is presented at Attachment A, *Mitigation Summary*.

When compared to utilities and service systems impacts that would result from the Koontz Site uses reflected in the General Plan Update EIR analyses, no new or substantially increased utilities and service systems impacts would result from the Project. No further analysis is required for the Project.

#### **4.0 SUMMARY AND CONCLUSION**

The approximately 146,563 square feet of light industrial warehouse uses proposed by the Project would be constructed in place of the 110,500 square feet of commercial/business park development anticipated for development within the Koontz Site. The analysis provided herein compares impacts of the Project with impacts of the anticipated development of the Koontz Site commercial/business park uses as presented in the General Plan Update EIR.

The preceding discussions and attached supporting technical analyses substantiate that the Project would not result in environmental impacts substantially greater than or different from impacts identified and addressed in the General Plan Update EIR. Moreover, under the environmental topics of air quality, greenhouse gas emissions, and transportation (VMT), the Project would result in demonstrably reduced impacts when compared to impacts resulting from development of the Koontz Site commercial/business park uses evaluated in the General Plan Update EIR. On the basis of the information presented here, no further environmental analysis is required for the Project.