

# Prologis Stewart and Gray Road Warehouse Project

Initial Study

March 2022 | 04967.00001.001

*Submitted to:*

**City of Downey**

11111 Brookshire Avenue  
Downey, CA 90241

*Prepared for:*

**Prologis, Inc.**

2141 Rosecrans Avenue  
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*Prepared by:*

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# ACRONYMS AND ABBREVIATIONS

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AB	Assembly Bill
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
amsl	above mean sea level
APZ	Accident Potential Zone
AQMP	Air Quality Management Plan
BMPs	best management practices
CAL FIRE	California Department of Forestry and Fire Protection
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CBC	California Building Code
CBMWD	Central Basin Municipal Water District
City	City of Downey
CIWMP	County Integrated Waste Management Plan
County	County of Los Angeles
CWA	Clean Water Act
DOC	California Department of Conservation
DTSC	California Department of Toxic Substances Control
DWR	California Department of Water Resources
EIC	Eastern Information Center
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FMMP	Farmland Mapping and Monitoring Program
GHGs	greenhouse gases
GSP	Groundwater Sustainability Plan
HELIX	HELIX Environmental Planning, Inc.
HRA	Health Risk Assessment
IBC	International Building Code
ICC	International Code Council
LACSD	Los Angeles County Sanitation District
MHFP	Multi-Hazard Functional Plan
MLD	Most Likely Descendant
MRZ	mineral resource zone

## ACRONYMS AND ABBREVIATIONS (cont.)

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MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
OHP	Office of Historic Preservation
RWQCB	Regional Water Quality Control Board
SB	State Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SEA	Sensitive Ecological Area
sf	square foot/feet
SGMA	Sustainable Groundwater Management Act
SR	State Route
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCR	Tribal Cultural Resource
UBC	Uniform Building Code
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zone
WQMP	Water Quality Management Plan

# 1.0 Introduction

## 1.1 Initial Study Information Sheet

1. Project title: Prologis Stewart and Gray Road Warehouse Project
2. Lead agency name and address: City of Downey; 11111 Brookshire Avenue, Downey, CA 90241
3. Contact person and phone number: Alfonso Hernandez, Senior Planner  
(562) 904-7154
4. Project location: 9300, 9350, and 9400 Hall Road and 9301, 9333, and 9399 Stewart and Gray Road, in Downey, CA
5. Project sponsor's name and address: Prologis, Inc.; 2141 Rosecrans Avenue, Suite 1151, El Segundo, CA 90245
6. General plan designation: GM – General Manufacturing
7. Zoning: M-2 – General Manufacturing Zone
8. Surrounding land uses and setting:

The Prologis Stewart and Gray Road Warehouse Project (Project) is located in the City of Downey (City), in Los Angeles County, at the northwest corner of the intersection of Stewart and Gray Road and Woodruff Ave (see Figure 1, *Regional Location*, and Figure 2, *Aerial Photograph*). The 29.16-acre Project site consists of five parcels (APN's: 6284-019-013, 6284-019-014, 6284-019-015, 6284-019-017, and 6284-019-016), located at 9300, 9350, and 9400 Hall Road and 9301, 9333, and 9399 Stewart and Gray Road. The Project site is currently improved with five industrial buildings located along Stewart and Gray Road to the south and Hall Road to the north, totaling approximately 433,000 square feet (sf).

The five existing industrial buildings and related improvements are currently utilized by the following industrial tenants: EJ Lauren (Furniture Manufacturing), 88 Logistics/88 Transportation (Biotechnology/Pharmaceutical Logistics), Western Pacific Pulp & Paper (Paper Recycler), OmniTeam (Commercial Kitchen Manufacturer) and Duray (Commercial Kitchen Manufacturer). The existing improvements were likely developed in the mid-1970s. The Project site currently has two driveway entrances off Stewart and Gray Road and three driveway entrances off Hall Road that lead to private internal roads, which connect around the separate buildings. These internal roads provide parking for employees, parking for trailers and containers, recycling equipment and storage of heavy operation equipment.

The site is currently zoned M-2 (General Manufacturing Zone). The Project site has a General Plan Land Use Designation of GM (General Manufacturing). The Project site is bordered by industrial uses to the east, west and south, and commercial uses to the north. Residential uses are present further to the west and northwest but are buffered by other industrial sites bordering the Project site.

9. Description of project:

The proposed Project would include the demolition of the existing five buildings (totaling approximately 433,000 sf) and the construction of an approximately 510,110-sf industrial concrete tilt-up building for warehouse/logistics uses, and a 25,000-sf ancillary truck workshop facility, together totaling 535,110 sf (see Figure 3, *Site Plan*). The Project would include 614 auto parking spaces, 215 trailer and/or container parking spaces and 109 dock loading doors. The warehouse would have a 40-foot interior clear height and maximum building height of 55 feet above grade.

The new industrial building is intended to be used for logistics and distribution purposes, and specifically as a fulfillment center and for cold storage. The facility will also include an office and mezzanine area. On-site activities will include the following: general industrial/warehouse with refrigeration and cold storage component for the purposes of receiving, storing, shipping of food and/or beverage products, storage, distribution, and/or consolidation of manufactured goods, and last-mile fulfillment and delivery. The office space is intended to be used for office uses ancillary to the warehouse operations. The 25,000-sf truck workshop building would be ancillary to the warehouse/distribution/logistics operation for purposes of maintaining a truck or van fleet, trailers, and associated equipment operating the facility. The proposed facility is intended to operate 24 hours a day, 7 days a week.

The building would include concrete tilt up panels on all sides of the building. The southeast and/or southwest side of the building would be the entrance to the office component and would include glazed windows, metal side paneling, enhanced exterior building materials and building modulation. All exterior and interior glazing would be tempered with vision glass and spandrel glass at the main entryways and around the perimeter of the building. In addition, the Project would include enhanced exterior building materials, landscaping totaling 10.2 percent of the site area, and a perimeter screen wall.

Construction of the Project would begin in Fall 2022 and would involve demolition and removal of all existing on-site structures, paving, and other improvements, which would occur for approximately five months. Following demolition and site preparation, construction of the proposed new buildings would begin in Spring 2023 and continue for approximately 10 months, with completion of the construction activities in late 2023.

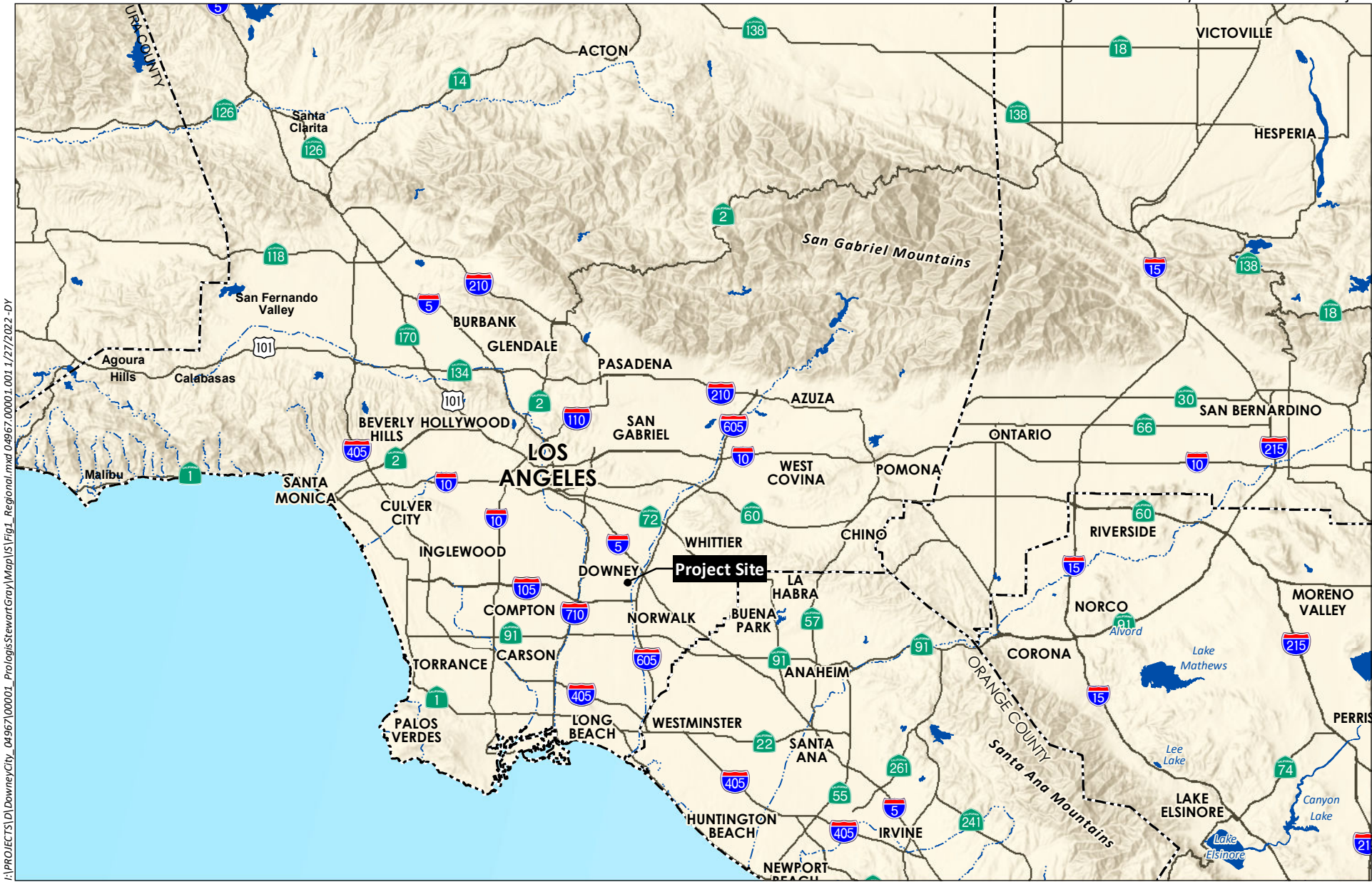
10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

None

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

As part of the CEQA process, the City will solicit consultation requests from potentially affected tribal governments in the area pursuant to Assembly Bill (AB) 52.





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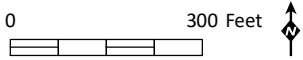


Source: Base Map Layers (ESRI, 2013)

 Project Site

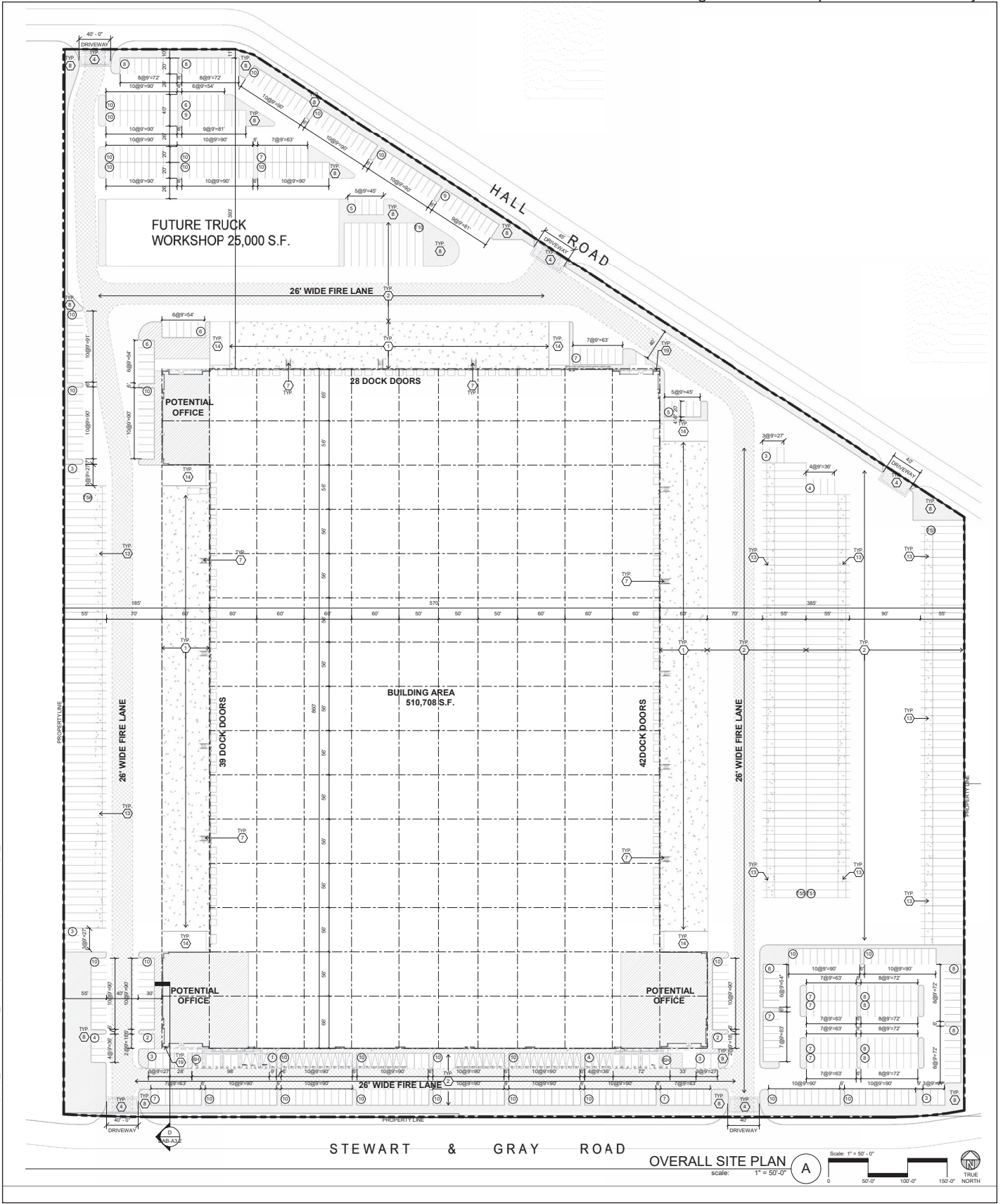


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Source: Aerial (Maxar, 2020)

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Source: HPA Architecture 2022

## 1.2 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a “Potentially Significant Impact” or “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

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

### 1.3 Determination

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that, although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that, although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

  
\_\_\_\_\_  
Signature

3/23/22  
\_\_\_\_\_  
Date

Alfonso S. Hernandez  
\_\_\_\_\_  
Printed name

City of Downey  
\_\_\_\_\_  
For

## 2.0 Environmental Initial Study Checklist

The lead agency has defined the column headings in the environmental checklist as follows:

- A. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- B. “Less Than Significant with Mitigation Incorporated” applies where the inclusion of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” All mitigation measures are described, including a brief explanation of how the measures reduce the effect to a less than significant level. Mitigation measures from earlier analyses may be cross-referenced.
- C. “Less Than Significant Impact” applies where the project does not create an impact that exceeds a stated significance threshold.
- D. “No Impact” applies where a project does not create an impact in that category. “No Impact” answers do not require an explanation if they are adequately supported by the information sources cited by the lead agency which show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project specific screening analysis).

## I. Aesthetics

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**No Impact.** Scenic vistas are generally defined as public viewpoints that provide expansive or notable views of a highly valued landscape and are typically identified in planning documents, such as a general plan, but can also include locally known areas or locations where high-quality public views are available. The City’s General Plan does not identify or otherwise designate scenic vistas or protected viewsheds (City 2005). The Project site is currently developed and surrounded by other industrial or commercial developments that prevent expansive views that could be considered scenic vistas. No impacts to scenic vistas would occur and no further analysis is required in the EIR.

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

**No Impact.** The Project site does not currently contain scenic resources such as trees, rock outcroppings, or historic buildings. There are no eligible or designated state scenic highways in the City or surrounding cities. Given that the Project site is not visible from an officially designated state scenic highway and no unique scenic resources exist on-site, the Project would not result in an impact to scenic resources within a state scenic highway. No impacts would occur, and no further analysis is required in the EIR.

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

**Potentially Significant Impact.** Public Resources Code 21071 defines the term “urbanized area” for the purpose of CEQA to mean an incorporated city that has a population of at least 100,000 persons or has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons. U.S. Bureau of the Census (U.S. Census Bureau) data from 2020 indicates that the City has a population of 114,355 and is therefore an urbanized area that should be evaluated relative to applicable zoning and other regulations governing scenic quality (U.S. Census Bureau 2020). The Project site parcels are zoned as M-2 (General Manufacturing Zone) and subject to the zoning regulations outlined in Municipal Code Section 9318.06.

The applicable Municipal Code sections include standards regulating building height, setbacks, landscaping, and other building components that address scenic quality. The proposed Project would comply with the setback, landscaping, and other development standards, but would exceed the 45-foot height limit for the zoning district. The Project aims to develop the Project site with buildings that will enhance the look and feel of this a dated manufacturing commercial corridor with both enhanced exterior building materials, landscaping treatments and a perimeter screen wall. However, given potential conflicts with existing zoning standards regarding building height and changes to the visual character of the site relative to existing conditions, impacts are potentially significant and will be further discussed in the EIR.

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

**Potentially Significant Impact.** The Project site is in a developed area surrounded primarily by commercial and industrial uses. The proposed building would include concrete tilt up panels on all sides and would include glazed windows. All exterior and interior glazing would be tempered with vision glass and spandrel glass at the main entryways and around the perimeter of the building. Section 9520.06 of the Municipal Code provides further specifics for outdoor lighting standards, such as height, direction, and intensities. The Project may create a new source of substantial light or glare that would adversely affect the area. Impacts are potentially significant and will be analyzed further in the EIR.

## II. Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non- forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**No Impact.** The Farmland Mapping and Monitoring Program (FMMP) is a statewide program that designates farmland among several categories, including Prime Farmland, Unique Farmland, and Farmland of Statewide Importance. The FMMP is maintained by the California Department of Conservation (DOC), the agency responsible for overseeing farmland classification throughout the state. According to the FMMP online mapping database, the Project site is classified as Urban and Built-Up Land (DOC 2018). Furthermore, the Project site is not used for agricultural production and would not convert existing farmland to a non-agricultural use. No impact would occur, and no further analysis is required in the EIR.

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

**No Impact.** The Williamson Act, also known as the California Land Conservation Act of 1965, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use; in return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value. The Williamson Act is only applicable to parcels within an established agricultural preserve consisting of at least 20 acres of Prime Farmland, or at least 40 acres of land not designated as Prime Farmland. As stated above, the Project site is already classified as Urban and Built-Up Land where no active farmland nor agricultural resources are present and would not be eligible for a Williamson Act contract. The Project would have no impact in relation to zoning for agricultural use or a Williamson Act contract, and no further analysis is required in the EIR.

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

**No Impact.** Public Resources Code Section 12220(g) defines “forest land” as land that can support 10 percent native cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Based on this definition, no forest land occurs within or adjacent to the Project site. There is no concentration of trees within the site that would constitute a forest. Moreover, there is no land zoned as forest land or timberland that exists within the Project site or within its vicinity (City 2012). Therefore, the proposed Project would not conflict with existing zoning for forest land or timberland. No impact would occur in relation to this issue and no further analysis is required in the EIR.

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

**No Impact.** As stated in Item II.c, there is no concentration of trees on the site that would constitute a forest. The site has not been historically and is not currently used or planned to be used for forest land. As such, implementation of the proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact would occur in relation to this issue and no further analysis is required in the EIR.

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

**No Impact.** As stated in Items II.a-d, the Project site is located in an area classified as Urban and Built-Up land where no agricultural resources or forest land are present. Therefore, implementation of the Project would not result in the conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. No impact would occur in relation to this issue and no further analysis is required in the EIR.

### III. Air Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>

a) Conflict with or obstruct implementation of the applicable air quality plan?

**Potentially Significant Impact.** Air quality at the Project site is regulated by the South Coast Air Quality Management District’s (SCAQMD’s) Air Quality Management Plan (AQMP). The SCAQMD develops rules and regulations; establishes permitting requirements for stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary. The Southern California Association of Governments (SCAG) has prepared the Regional Transportation Plan/ Sustainable Communities Strategy, a long-range transportation plan based on growth forecasts, which forms the basis for land use and transportation control portions of the AQMP. Air quality impacts for the project will be detailed in the Air Quality and Greenhouse Gas Report that will be prepared for the Project. Impacts related to the air quality plans are potentially significant and will require further analysis in the EIR.

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

**Potentially Significant Impact.** In accordance with CEQA Guidelines Section 15064(h)(3), the SCAQMD’s approach for assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. If a project is not consistent with the AQMP, which is intended to bring the SCAB into attainment for all criteria pollutants, that project can be considered cumulatively considerable. Additionally, if the mass regional emissions calculated for a project exceed the applicable SCAQMD daily significance thresholds that are designed to assist the region in attaining the applicable state and national ambient air quality standards, that project can be considered cumulatively considerable. The Project has the potential to result in a significant impact related to SCAQMD criteria air pollutant emissions thresholds. An Air Quality and Greenhouse Gas Report and a Health Risk Assessment (HRA) will be prepared for the Project to determine if there would be any impacts related to this issue. Impacts are potentially significant and will be further analyzed in the EIR.

c) Expose sensitive receptors to substantial pollutant concentrations?

**Potentially Significant Impact.** Impacts to sensitive receptors would have the potential to occur because criteria pollutant and toxic air contaminant (TAC) emissions would be generated during Project construction and operation. An Air Quality and Greenhouse Gas Technical Report and HRA will be

prepared to determine if there would be impacts to sensitive receptors. Impacts are potentially significant and will be further analyzed in the EIR.

- d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

**Less Than Significant Impact.** Land uses generally associated with odor complaints include the following: agricultural uses (livestock and farming); wastewater treatment plants; food processing plants; chemical plants; composting operations; refineries; landfills; dairies; and fiberglass molding facilities. The Project would not involve these land uses typically associated with emitting objectionable odors. Other potential odor sources associated with the Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the Project’s (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City’s solid waste regulations. The Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the Project construction and operations are not expected to result in adverse effects. Impacts would be less than significant, and no further analysis is required in the EIR.

#### IV. Biological Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**No Impact.** The Project site and its surroundings consist of numerous structures and paved lots associated with industrial land uses. No native vegetation exists onsite, and any remaining vegetation due to landscaping is ornamental and not a special status species. Given the lack of habitat and industrial site use, no wildlife species are expected to occur at the Project site. As such, no direct impact would occur and there would be no potential for habitat modification. No impacts would occur to candidate, sensitive, or special status species, and no further analysis in the EIR is required.

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

**No Impact.** The Project includes the construction and operation of a warehouse and truck workshop as a replacement to existing industrial operations with no native habitat onsite. No riparian or other sensitive habitat is located at the site or its immediate surroundings. As such, the Project would not have adverse effects on riparian or other sensitive vegetation communities. No impact would occur, and no further analysis is required in the EIR.

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

**Less than Significant Impact.** The Project site is developed and paved. No wetlands or protected waters are located at the Project site. The riverine habitat 0.5 mile southwest of the Project is the nearest habitat identified in the National Wetlands Inventory (USFWS 2021). As discussed further in section VII, the Project would be subject to BMPs and permit conditions to prevent potentially adverse indirect effects due to grading and construction. No direct impacts would occur, as there are no wetlands at the Project site. Impacts would be less than significant, and no further analysis is required in the EIR.

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

**Less than Significant Impact.** Los Angeles County designates land as Significant Ecological Areas (SEAs) where important habitat linkages and wildlife corridors can be maintained by limiting development. No SEA is located within the City of Downey, and thus the Project site is not in or near a SEA. The Project site and its surroundings are disturbed and developed with little to no natural habitat that could be utilized by migratory or nesting wildlife. Implementation of the Project would involve demolition of multiple industrial buildings and construction of a new, larger warehouse, which would maintain similar biological conditions as the existing site. The Project would not interfere with wildlife movement, established corridors, or nursery sites. Impacts would be less than significant, and no further analysis in the EIR is required.

- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

**No Impact.** The City’s tree protection ordinances apply only to City-owned trees on public streets and do not regulate trees on private property. The General Plan’s Conservation Chapter encourages the preservation of mature landscaping on private property but does not regulate it (City 2005). The Project site contains very few trees and conditions would be improved by the landscaping of the proposed Project, which would cover 10.2 percent of the site. The Project would not conflict with any local policies or ordinances protecting existing biological resources, as the trees are located on private property. No impact would occur, and no further analysis is required in the EIR.

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

**No Impact.** There are no Habitat Conservation Plans, Natural Community Conservation Plans, or otherwise applicable habitat conservation plans in the City of Downey and therefore the Project site. The Project site is disturbed and urbanized, as is most of the City. No impact would occur in relation to conservation plans and no further analysis is required in the EIR.

## V. Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** Implementation of the Project could cause ground disturbance that has the potential to cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5. A Cultural Resources Report will be prepared for the proposed Project. The Cultural Resources Report will include a records search, Sacred Lands File search, Native American outreach, a review of historic aerial photographs and maps, and a pedestrian survey of the Project site. A review of the directories maintained by the California Historical Resources, the state Office of Historic Preservation (OHP), and the National Register of Historic Places (NRHP) will also be conducted to determine the presence or absence of historic resources in the Project area. Impacts are potentially significant and will be analyzed further in the EIR.

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

**Potentially Significant Impact.** As stated above, a Cultural Resources Report will be prepared for the proposed Project. Since there is the potential for buried cultural remains/resources to be present within the Project site boundaries, ground-disturbing activities could affect such resources. Therefore, the Project could result in a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines. Impacts are potentially significant and further analysis of this issue will be provided in the EIR.

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

**Potentially Significant Impact.** The Project site is not located within or near a formal cemetery and is not known to be located on a burial ground. However, there is the potential for unknown buried human remains to be present within the Project area and ground-disturbing activities could disturb human remains. Impacts are potentially significant and further analysis of this issue will be provided in the EIR.

## VI. Energy

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

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

**Potentially Significant Impact.** The construction and operation of the proposed Project would involve the consumption of energy for lighting, heating, cooling, and other Project needs. An Air Quality and Greenhouse Gas Report will be prepared to determine if the Project would have significant impacts related to energy consumption. The report will include projections for increases in energy use for construction and operation. Impacts are potentially significant and will be analyzed further in the EIR.

- b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

**Potentially Significant Impact.** Several levels of government have implemented regulatory programs in response to reducing GHG emissions, which consequently serve to increase energy efficiency. Many of the measures these programs are beyond the ability of any future development to implement and are implemented at the utility provider or the manufacturer level. The Project would comply with CCR Title 24, as required to further assure energy efficiency. Title 24 regulates green building practices and includes standards for planning and design, water efficiency, material conservation and resource efficiency, and environmental quality. Regulations for non-residential development set forth the standards for bicycle parking, light pollution reduction, electric vehicle charging spaces, low flow faucets, and toilets, irrigation, and weather protection; all with the goal of increasing energy efficiency. Further discussion of the Project’s consistency with state and local plans will be included in the Air Quality and Greenhouse Gas Report and EIR. Impacts are potentially significant and will be further analyzed in the EIR.

## VII. Geology and Soils

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	■
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	■

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

**Less Than Significant Impact.** The City, like the rest of southern California, is located within a seismically active region as a result of being located near the active margin between the North American and Pacific tectonic plates. The Alquist-Priolo Earthquake Fault Zoning Act requires the State Geologist to identify earthquake fault zones along traces of both recently and potentially active major faults. Cities and counties that contain such zones must inform the public regarding the location of these zones, which are usually one-quarter mile or less in width. Proposed development plans within these earthquake fault zones must be accompanied by a geotechnical report prepared by a qualified geologist describing the likelihood of surface rupture. The Project site is not within an Alquist-Priolo Fault Zone. The La Habra Fault Zone is the nearest Alquist-Priolo Earthquake Fault Zone and is located approximately 7.5 miles east of the Project site. Due to this distance, it is unlikely that the Project would be subjected to fault rupture associated with the La Habra Fault Zone. Impacts would be less than significant, and no further analysis is required in the EIR.

- ii. Strong seismic ground shaking?

**Potentially Significant Impact.** The Project site is located within the seismically active southern California region and would be expected to experience effects related to earthquakes, such as ground shaking. A Geotechnical Report will be prepared in order to assess the potential for the Project to have adverse effects during strong seismic ground shaking. Impacts are potentially significant and will be analyzed further in the EIR.

iii. Seismic-related ground failure, including liquefaction?

**Potentially Significant Impact.** Liquefaction is a phenomenon that occurs when soil undergoes transformation from a solid state to a liquefied condition when subjected to high intensity ground shaking. This typically occurs where susceptible soils (particularly the medium sand to silt range) are located over a high groundwater table (within 50 feet of the surface). Affected soils lose all strength during liquefaction and foundation failure can occur. The City's General Plan Safety Chapter and the DOC's Earthquake Hazards Map indicate that the combination of a susceptible soil type and high groundwater table makes the City, including the Project site, vulnerable to liquefaction (City 2005; DOC 2021). A Geotechnical Report will be prepared in order to further assess the potential for impacts related to liquefaction to occur. Impacts are potentially significant and will be analyzed further in the EIR.

iv. Landslides?

**No Impact.** The Project site is relatively flat and there are no hillsides or steep topographic features at the site or in surrounding areas that could contribute to landslides. According to the DOC's Earthquake Hazards Map the Project site is not located in a landslide zone (DOC 2021). No impacts related to landslides would occur and no further analysis is required in the EIR.

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

**Less Than Significant Impact.** The Project site has previously been altered by grading and construction, however soil exposed by construction activities could be subject to erosion if exposed to heavy rain, winds, or other storm events. Compliance with the SCAQMD Rule 403 (Fugitive Dust) would include implementation of soil stabilization measures, such as daily watering, and compliance with the National Pollution Discharge Elimination System (NPDES) General Construction Permit would include implementation of BMPs deemed applicable to the Project's construction activities. The CBC requires an erosion control and grading plans prior to issuance of a grading permit as a means to minimize soil erosion to the extent practicable during both construction and operational phases. Once operational the Project would consist of paved surfaces that would not expose soils to conditions that contribute to erosion. Compliance with the various permits and plans would reduce Project impacts to less than significant in relation to this issue and no further evaluation is required in the EIR.

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

**Potentially Significant Impact.** As discussed in section VII.a.iii-iv, the Project site is not likely to experience landslides, but is in a liquefaction hazard zone. A Geotechnical Report will be prepared in order to further assess the potential for impacts related to the geologic unit and soil at the Project site. Impacts are potentially significant and will be analyzed further in the EIR.

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

**Potentially Significant Impact.** Expansive soils are those that have greater potential for shrinking and swelling when exposed to dry or wet conditions. Soil testing that will be conducted as part of the geological and soils report will indicate the expansion potential of the Project site's soils and any design

features necessary to accommodate such soils. Impacts are potentially significant and will be analyzed further in the EIR.

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

**No Impact.** The proposed Project does not include the implementation of septic tanks or alternative wastewater disposal systems. No impacts would occur, and no further analysis is required in the EIR.

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

**No Impact.** The City’s General Plan EIR indicates that no impacts related to paleontological resources are expected in the City due to its lack of undisturbed land and no history of finding paleontological resources (City 2004). The Project site has been previously graded and is currently paved land, making it unlikely that construction activities would uncover paleontological resources. No impacts to paleontological resources would occur and no further analysis is required in the EIR.

### VIII. Greenhouse Gas Emissions

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

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

**Potentially Significant Impacts.** The Project has the potential to generate greenhouse gas emissions, both directly and indirectly, that may have a significant impact on the environment. An Air Quality and Greenhouse Gas Report will be prepared to determine if the Project would have significant impacts related to greenhouse gas emissions. Impacts are potentially significant and will be analyzed further in the EIR.

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

**Potentially Significant Impacts.** The Project has the potential to conflict with a plan, policy, or regulation adopted to reduce emissions of greenhouse gases. An Air Quality and Greenhouse Gas Report will be prepared to determine if the Project would have significant impacts related to greenhouse gas reduction policies. Impacts are potentially significant and will be analyzed further in the EIR.

## IX. Hazards and Hazardous Materials

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

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

**Less Than Significant Impact.** Small amounts of potentially hazardous materials (e.g., fuel, lubricants, and solvents) may be used during construction activities. Hazardous materials used during Project construction would be transported, used, and stored in accordance with state and federal regulations regarding hazardous materials. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be in the Project area during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the Project than would occur on any other similar construction site. Construction

contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the United States Environmental Protection Agency (USEPA), the California Department of Toxic Substances Control (DTSC), SCAQMD, and the Los Angeles Regional Water Quality Control Board (RWQCB). With mandatory compliance to applicable hazardous materials regulations, the Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase.

The new industrial building is intended to be used for logistics and distribution purposes, specifically as a fulfillment center and for cold storage. Operation would involve the use of materials common to urban development that are labeled hazardous (e.g., solvents and commercial cleansers; petroleum products; and pesticides, fertilizers, and other landscape maintenance materials). There is the potential for routine use, storage, or transport of other hazardous materials; however, the precise materials are not known, as the tenants are not yet defined. If hazardous materials, other than those common materials described above, are associated with future warehouse operations, the hazardous materials would only be stored and transported to and from the building sites. Manufacturing and other chemical processing would not occur within the proposed warehouse uses.

Exposure of people or the environment to hazardous materials during operation of the Project may result from (1) the improper handling or use of hazardous substances; (2) transportation accidents; or (3) an unforeseen event (e.g., fire, flood, or earthquake). The severity of any such exposure is dependent upon the type and amount of the hazardous material involved; the timing, location, and nature of the event; and the sensitivity of the individuals or environment affected. As previously discussed, the U.S. Department of Transportation prescribes strict regulations for hazardous materials transport, as described in Title 49 of the Code of Federal Regulations (i.e., the Hazardous Materials Transportation Act); these are implemented by Title 13 of the California Code of Regulations. It is possible that vendors may transport hazardous materials to and from the Project; and the drivers of the transport vehicles must comply with the Hazardous Materials Transportation Act. Hazardous materials or wastes stored on site are subject to requirements associated with accumulation time limits, amounts, and proper storage locations and containers, and proper labeling. The number of materials that would be handled at any one time for the proposed warehouse operations would be relatively small. Additionally, for removal of hazardous waste from the site, hazardous waste generators are required to use a certified hazardous waste transportation company which must ship hazardous waste to a permitted facility for treatment, storage, recycling, or disposal. With compliance with applicable regulations, operation of the Project would not result in a significant risk to the public or the environment through the potential routine transport, use, or disposal of hazardous materials. Impacts would be less than significant, and no further evaluation is required in the EIR.

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

**Potentially Significant Impact.** Hazardous materials releases can occur if there are existing hazardous materials at the Project site that would be disturbed by Project construction or operation, or if future Project construction or operation activities involve the handling of substantial amounts of hazardous materials with a potential to result in upset and accident conditions. As discussed above, the Project does not propose handling substantial amounts of hazardous materials in the future. However, there are hazardous materials onsite that could be disturbed by the Project. A Phase I Environmental Site

Assessment and Phase II Investigation Report were conducted at the Project site in 2017 and indicated the existence of contamination onsite (SCS 2017a; SCS 2017b). Mitigation measures and regular monitoring of the site have been occurring since the site became a Cleanup Program Site under RWQCB in 2018. The impacts of the proposed Project with respect to exposing the public or the environment to hazardous materials through upset and accident conditions are potentially significant and will be analyzed further in the EIR.

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

**No Impact.** The Project site is not located within one-quarter mile of a school, as the school nearest to the Project site, A.L. Gauldin Elementary School, is approximately 0.7 mile south of the Project site. No impact related to the handling of hazardous materials within one-quarter mile of a school would occur and no further evaluation is required in the EIR.

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

**Potentially Significant Impact.** Pursuant to Government Code Section 65962.5 (Cortese List) requirements, the State Water Resources Control Board (SWRCB) GeoTracker database (SWRCB 2021) and the California Department of Toxic Substances Control (DTSC) EnviroStor database (DTSC 2021) were searched for hazardous materials sites within the Project area. The adjacent parcel at 9236 E. Hall Road has an EnviroStor listing related to a tiered permit. No information or data was available on the types and concentrations of VOCs associated with the release (SCS 2017a). The Project site (Downey Industrial Center) has an active cleanup site. These listings indicate there may be a hazard to the public or environment because of a hazardous materials site. Impacts are potentially significant and further analysis will be included in the EIR.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

**No Impact.** The Project site is not within the planning area for any airport land use plan (LA County 2022). The nearest airport to the project site is the Compton Woodley Airport, located 11.3 miles southwest of the Project site. No impacts related to a safety hazard or excessive noise from an airport would occur and no further analysis in the EIR is required.

- f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

**Potentially Significant Impact.** The City's General Plan Safety Chapter outlines emergency response plans that are coordinated at the federal, state, and local level to ensure adequate emergency response. The City maintains an Emergency Operation Plan for local emergencies and is a member of mutual aid agreements with nearby cities, as coordinated by the Los Angeles County Office of Disaster Preparedness (City 2005). The casualty collection points during emergencies would be the Rio Hondo Golf Course and Apollo Park, which are located 3 miles northwest and 3 miles west of the Project site, respectively. The Project would not physically interfere with these evacuation plans. To determine the Project's potential impacts on emergency access during operation, a Traffic Impact Analysis will be

prepared for the proposed Project. Impacts are potentially significant and will be further analyzed in the EIR.

- g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

**Less Than Significant Impact.** According to the Very High Fire Hazard Severity Zones (VHFHSZ) in LRA Map prepared by California Department of Forestry and Fire Protection (CAL FIRE) for Los Angeles County, the Project site is not in a VHFHSZ (CAL FIRE 2011). The City’s Safety Chapter of the General Plan recognizes structure fires as the main threat in the City due to the lack of undeveloped land with vegetation (City 2005). There are no wildland areas adjacent to the Project that would contribute to a wildland fire. The proposed Project would comply with the fire code in Municipal Code Article III Chapter 3, including adopting the latest CBC standards, and the California Fire Code to minimize impacts related to wildland fires. The proposed Project is not anticipated to expose people or structures to wildland fires. Impacts would be less than significant, and no further evaluation is required in the EIR.

## X. Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off- site?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

**Potentially Significant Impact.** The Los Angeles Regional Water Quality Control Board sets water quality standards for all ground and surface waters within the Project’s region. Activities associated with the construction of the proposed Project would include grading, which may have the potential to release pollutants (e.g., oil from construction equipment, cleaning solvents, paint) and silt off-site which could impact water quality. The Project would prepare a Water Quality Management Plan (WQMP) to illustrate how low impact development Best Management Practices (BMPs) have been incorporated into Project construction and design. The WQMP would incorporate BMPs in accordance with the California Stormwater BMPs Handbook and the City’s BMP Design Manual to control erosion and protect the quality of surface water runoff.

As required under the NPDES, a SWPPP would be created specifically for construction of the proposed Project. The plan would address erosion control measures that would be implemented to avoid or minimize erosion impacts to exposed soil associated with construction activities. Implementation of the appropriate BMPs is expected to reduce or eliminate the discharge of potential pollutants. However, impacts are potentially significant and further analysis will be provided in the EIR.

b) 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 Impact.** The Project is located within the Central Groundwater Basin, which is recharged at the Whittier Narrows Dam, Rio Hondo Spreading Grounds, San Gabriel Coastal Spreading Grounds, Lower San Gabriel River, and Alamitos Barrier Project (CBMWD 2021). The Central Groundwater Basin is very low priority under the Sustainable Groundwater Management Act (SGMA), and therefore is not required to create a Groundwater Sustainability Plan (GSP; DWR 2020).

Groundwater is the primary supply source of water for Downey via the Central Basin Municipal Water District (CBMWD). According to the CBMWD’s Urban Water Management Plan (UWMP), there is sufficient water resources to serve the member agencies (including the City of Downey) through 2045 in normal, dry, and multiple dry years (CBMWD 2021). The Project would not substantially decrease groundwater supplies.

The Project site is currently occupied by industrial uses and consists primarily of impermeable surfaces, such as building roofs and paved internal roads. With implementation of the Project, conditions would remain mostly impermeable, but with the addition of landscaping features (covering 10.2 percent of the Project site) that could facilitate some percolation and groundwater recharge. There would not be a



substantial interference with groundwater recharge as a result of the Project. Impacts would be less than significant, and no further evaluation is required in the EIR.

- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
  - i. Result in substantial erosion or siltation on- or off-site?
  - ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off- site?
  - iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff?

**Potentially Significant Impact.** The Project has the potential to change runoff patterns through changes to impervious surfaces but does not include alteration of a stream or river. BMPs would be established to prevent substantial erosion. A Drainage Study will be prepared to determine if there would be on- or off-site flooding impacts, stormwater drainage capacity overload, or substantial polluted runoff. The WQMP, applicable BMPs, and the Drainage Study will be discussed in the EIR to determine impacts related to drainage patterns. Impacts are potentially significant and will be analyzed in the EIR.

- iv. Impede or redirect flood flows?

**Less than Significant Impact.** According to the Federal Emergency Management Agency (FEMA) Flood Map Service Center, the Project site is within Zone X (shaded; FEMA 2008). According to the FEMA glossary these “are the areas between the limits of the base flood and the 0.2-percent-annual-chance (or 500-year) flood.” The USACE raised local channel levees in 2000 such that no properties in Downey remain within the 100-year floodplain. Therefore, the Project would not significantly impede or redirect flood flows. Impacts are less than significant and will be analyzed further in the EIR.

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

**Less than Significant Impact.** As discussed above, the Project site is not within the 100-year floodplain and does not have a significant risk of flood. The Project site is located roughly 12 miles inland from the Pacific Ocean and is not at risk of inundation from a tsunami. Seiche zones require closed or semi-closed bodies of water; while an existing above-ground water tank is located on the south side of Stewart and Gray Road southwest of the Project site, failure of this facility and subsequent inundation of the Project site is not anticipated to result in the release of pollutants because any existing contamination on-site would be remediated prior to Project completion and operations. Once operational, the Project would not involve notable amounts of hazardous materials or other pollutant sources such that incidental inundation by tank failure would release substantial quantities of pollutants into the environment. The Project would not be at risk of floods, tsunamis, or seiches, and therefore would not release pollutants due to inundation. Impacts are less than significant and do not require further analysis in the EIR.

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

**Potentially Significant Impact.** As discussed in section X.a, implementation of the Project has the potential to impact water quality. However, as discussed in section X.b, there is no GSP for the Project area, so there would be no conflicts with a sustainable groundwater management plan. Water quality control plan consistency will be determined based on further information to be provided in a Hydrology/Drainage study and WQMP. Impacts regarding a water quality control plan are potentially significant and will be analyzed further in the EIR.

## XI. Land Use and Planning

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) Physically divide an established community?

**No Impact.** The Project would develop a new warehouse and truck repair facility on an existing industrial site. The surrounding land uses are commercial and other industrial site. Implementation of the proposed Project would maintain the existing land use and would not add any features that would physically divide an established community. No impacts would occur, and no further evaluation is required in the EIR.

- b) Cause 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?

**Potentially Significant Impact.** The Project site is zoned as M-2 (General Manufacturing Zone) and planned for the GM (General Manufacturing) land use. Warehouse and truck repair uses are permitted in the M-2 zone pursuant to Municipal Code Section 9318.04. The change in site use from industrial to a distribution center may cause significant environmental impact related to the General Plan and Zoning Code. Consistency with these policies will be discussed in the EIR. Therefore, impacts are potentially significant and will be further analyzed in the EIR.

## XII. Mineral Resources

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

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

**No Impact.** According to the City’s General Plan EIR, their review of the state of California’s mineral resource maps indicated that there are no known mineral resources located within the City (City 2004). Therefore, the Project would not 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 would occur, and no further analysis is required in the EIR.

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

**No Impact.** As stated above in Item XII.a, the City’s General Plan EIR does not recognize any mineral resource areas in the City. Additionally, the Project area is not used for mineral extraction and is not known as a locally important mineral resource recovery site. No impact would occur and no further analysis is required in the EIR.

## XIII. Noise

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**Potentially Significant Impact.** The Project’s construction and operational activities could cause significant ambient noise level impacts in the vicinity of the Project site and will be evaluated in a Noise Study. Impacts are potentially significant and will be analyzed further in the EIR.

- b) Generation of excessive groundborne vibration or groundborne noise levels?

**Potentially Significant Impact.** The Project’s construction and operational activities could result in a potentially significant vibration impact. To determine the Project’s construction and operational vibration, a Noise Study will be prepared for the proposed Project. Impacts are potentially significant and will be analyzed further in the EIR.

- c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

**No Impact.** The Project site is not within the planning area for any airport land use plan (LA County 2022). The nearest airport to the project site is the Compton Woodley Airport, located 11.3 miles southwest of the Project site. No impacts related to airport noise would occur and no further analysis in the EIR is required.

#### XIV. Population and Housing

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

**Less Than Significant Impact.** The proposed Project does not include residential development that would directly or indirectly affect the number of residents in the area and would not contribute to the creation of additional housing in the City. The proposed Project would include a warehouse building and truck workshop, which would replace existing industrial buildings with similar business uses. Once operational, the Project is expected to hire from the existing population and has no other features that would directly or indirectly induce population growth. Impacts would be less than significant in relation to this issue and no further analysis is required in the EIR.

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

**No Impact.** The proposed Project includes demolition of industrial buildings and construction of a warehouse building and truck workshop. The existing development does not contain housing; thus, the Project would not remove housing or displace people, necessitating the construction of replacement housing. No impact would occur, and no further analysis is required in the EIR.

## XV. Public Services

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Fire protection?

**Less than Significant Impact.** The Project would involve the demolition of five existing industrial buildings (totaling approximately 433,000 sf) and the construction of a new warehouse and truck workshop (totaling 535,110 sf). The Downey Fire Department operates four stations with four corresponding service districts. The Project site is in District 2 and serviced by Fire Station #2, which is located at 9556 Imperial Highway, approximately 1 mile south of the Project site. In addition to the City’s four fire stations, the City is a member of mutual aid agreements with nearby cities that assist the other jurisdictions as necessary (City 2005). The Project would not include a land use that would require unique or expanded fire protection services. The Project would require fire protection services comparable to the existing conditions at the site and would not result in an increase in services such that new facilities or resources would need to be added to the Fire Department’s capacity. Impacts are less than significant, and no further analysis is required in the EIR.

b) Police protection?

**Less than Significant Impact.** The proposed Project would include the construction and operation of a warehouse and truck workshop that would replace existing industrial facilities. The Downey Police Department would service the Project site and is headquartered at 10911 Brookshire Avenue, 1.1 miles northwest of the Project site. The Project would require police protection services however, no new uses that would increase the City’s population or would require unique police protection services would be involved. As such, the Project would not result in the need for expanded facilities. Impacts are less than significant, and no further analysis is required in the EIR.

c) Schools?

**No Impact.** The Project would involve demolition of existing industrial facilities and construction of a warehouse and truck workshop. New residents would not be introduced to the area and therefore would not require additional schools. No impact would occur, and no further analysis is required in the EIR.

d) Parks?

**No Impact.** The Project would involve demolition of existing industrial facilities and construction of a warehouse and truck workshop. It is not anticipated to result in increased use or demand on parks that would require the construction or expansion of additional park and recreational facilities. No impact would occur, and no further analysis is required in the EIR.

e) Other public facilities?

**No Impact.** Other public facilities may include libraries, senior centers, community centers, and pools, all of which are intended to serve the general public. The proposed Project involves the construction and operation of a warehouse and truck workshop site and would not result in a change of demand on these services. Therefore, there would be no need for the construction or expansion of other public facilities. Therefore, no impact would occur, and no further analysis is required in the EIR.

**XVI. Recreation**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) 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?

**No Impact.** The proposed Project consists of construction and operation of a warehouse site. The Project would not increase the use of or create the need for new parks and recreational facilities. Therefore, the proposed Project would not result in physical deterioration of an existing open space area or any recreation facilities. No impact would occur, and no further analysis is required in the EIR.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

**No Impact.** The proposed Project consists of construction and operation of a warehouse site. It would not include recreational facilities or require the construction of new recreational facilities. No impacts would occur, and no further analysis is required in the EIR.

## XVII. Transportation

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

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

**Potentially Significant Impact.** To determine the Project’s circulation system impacts, a Traffic Impact Analysis will be prepared for the proposed Project, as the Project has the potential to conflict with circulation plans. Impacts are potentially significant and will be further analyzed in the EIR.

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

**Potentially Significant Impact.** To determine the Project’s vehicle miles traveled and consistency with CEQA Guidelines section 15064.3, a Traffic Impact Analysis will be prepared. Impacts are potentially significant and will be further analyzed in the EIR.

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

**Potentially Significant Impact.** A Traffic Impact Analysis will be prepared for the proposed Project to determine if there would be any hazards or incompatible uses as a result of the Project. Impacts are potentially significant and will be further analyzed in the EIR.

- d) Result in inadequate emergency access?

**Potentially Significant Impact.** To determine the Project’s potential impacts on emergency access, a Traffic Impact Analysis will be prepared for the proposed Project. Impacts are potentially significant and will be further analyzed in the EIR.



## XVIII. Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) 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	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?				
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?				
<p><b>Potentially Significant Impact.</b> Construction and operation of the proposed Project would result in land disturbance and other activities that could result in a potentially significant impact to a tribal cultural resource. A Cultural Resources Study will be prepared for the proposed Project site. As part of the EIR preparation process, the City will offer consultation to California Native American tribes that are traditionally and culturally affiliated with the area pursuant to AB 52.</p>				

Through its implementing regulations, AB 52 requires that lead agencies consult with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the Proposed Project and who have requested in writing to be informed by the lead agency of proposed projects in the tribe’s geographic area (Public Resources Code Section 21080.3.1(b) and (d)). Pursuant to AB 52, as the CEQA Lead Agency, the City, will notify tribes of the Project and solicit consultation. The conclusion of the AB 52 process and the Cultural Resources Study will be discussed in the EIR.

## XIX. Utilities and Service Systems

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

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

**Less than Significant Impact.** The proposed Project is in a developed area with existing infrastructure related to water, wastewater, stormwater, electricity, natural gas, and telecommunications facilities. The Project site has connections to these utilities related to the existing buildings and would make connections to the utilities during construction. Connections would not require relocation or construction of the related facilities. Impacts would be less than significant, and no further analysis is required in the EIR.

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

**Less than Significant Impact.** The City's 2015 UWMP evaluates the adequacy of the City's water supply and determined that the City can meet demands during normal, single dry, and multiple dry years for the following 20 years (City 2018). The City is a retailer of water purchased from the CBMWD, which is reliant on water imported from the Metropolitan Water District of Southern California (MWD). The CBMWD's UWMP demonstrated the ability to meet the demands of their member agencies, through MWD supplies, in normal, dry, and multiple dry years through 2045 (CBMWD 2021). Water conservation regulations are also included in City Municipal Code Sections 7350 and 7353 to ensure adequate water resources are available to all customers in the City. The Project would have sufficient water supplies available given that the City's water demands can be supplied during normal, dry, and multiple dry year. Impacts would be less than significant, and no further analysis will be provided in the EIR.

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

**Less than Significant Impact.** The City of Downey does not currently have a wastewater facility within its jurisdiction, but utilizes recycled water provided by CBMWD and treated by the Los Angeles County Sanitation District (LACSD) at the Los Coyotes Water Reclamation Plant in Cerritos. According to the CBMWD UWMP, the Los Coyotes Water Reclamation Plant is operating at 50 percent below capacity. Wastewater is also currently generated by the existing facilities at the Project site and would not be expected to substantially increase with implementation of the proposed Project. Therefore, the Project would not result in a demand increase such that the wastewater treatment provider would be unable to fulfill its existing commitments. Impacts would be less than significant, and no further analysis will be required in the EIR.

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

**Less than Significant Impact.** Solid waste disposal services in the City of Downey are provided by CalMet Services, Inc, which transports waste to the Downey Area Recycling and Transfer Facility, which is owned by the County Sanitation Districts of Los Angeles County. Policies and programs listed under Utilities and Service Systems in Appendix A of the City's General Plan EIR require recycling and waste reduction, educational programs, and waste reporting (City 2004). With implementation of these programs and policies, solid waste capacity was determined to be a less than significant impact with mitigation in the City's General Plan EIR (City 2004). Information would be provided to the Project tenants by the City regarding solid waste reduction. Impacts would be less than significant, and no further analysis will be included in the EIR.

- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

**Less than Significant Impact.** Federal, State, and local statutes and regulations regarding solid waste generation, transport, and disposal are intended to decrease solid waste generation through mandatory reductions in solid waste quantities (e.g., through recycling and composting of green waste) and the safe and efficient transport of solid waste. The proposed Project would be required to comply with applicable practices enacted by the City under the California Integrated Waste Management Act of 1989

(AB 939) and any other applicable local, State, and federal solid waste management regulations. AB 939 requires all counties to prepare a County Integrated Waste Management Plan (CIWMP). The County of Los Angeles adopted its CIWMP in 1997 and is in the process of updating its Countywide Siting Element as of January 2022.

Article V, Chapter 8 (Ordinance No. 09-1252) of the Downey Municipal Code requires that 100 percent of inert debris and at least 50 percent of the remaining construction and demolition debris generated during a construction or demolition project, be diverted from landfill, unless the applicant is exempt under Section 5870. Covered applicants are required to complete a Construction and Demolition Waste Management Plan (Form A) that details anticipated diversion practices, and materials to be recycled or reused. The Waste Management Plan Compliance Report (Form B) must be submitted 30 days after the completion of the project. The proposed Project would comply with all regulatory requirements regarding solid waste. Impacts would be less than significant, and no further analysis is required in the EIR.

## XX. Wildfire

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

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

**Less than Significant Impact.** The City’s General Plan Safety Chapter outlines emergency response plans that are coordinated at the federal, state, and local level to ensure adequate emergency response. The City maintains an Emergency Operation Plan for local emergencies and is a member of mutual aid agreements with nearby cities, as coordinated by the Los Angeles County Office of Disaster Preparedness (City 2005). The casualty collection points during emergencies would be the Rio Hondo

Golf Course and Apollo Park, which are located three miles northwest and three miles west of the Project site, respectively. The Project would not physically interfere with evacuation plans.

In the event of an emergency, Project site would be accessible via the three driveways along Hall Road or the two driveways along Stewart and Gray Road. Fire lanes 26 feet wide would be available on all four sides of the building. Project impacts would be less than significant, and no further evaluation is required in the EIR.

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

**No Impact.** According to the VHFHSZ in LRA Map prepared by CAL FIRE for Los Angeles County, the Project site is not in a VHFHSZ (CAL FIRE 2011). The City's Safety Chapter of the General Plan recognizes structure fires as the main threat in the City due to the lack of undeveloped land with vegetation (City 2005). The proposed Project would comply with the fire code in Municipal Code Article III Chapter 3, including adopting the latest CBC standards, and the California Fire Code to minimize impacts related to fires. The proposed Project would not exacerbate wildfire risks due to slope, prevailing winds, or other factors, and thereby would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impacts would occur, and no further evaluation is required in the EIR.

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

**No Impact.** The proposed Project would not include the installation of infrastructure that would exacerbate fire risks. The Project would be required to comply with the California Fire Code and Municipal Code Article III, Chapter 3, which stipulate the standards for access, fire hydrants, water pressure, fire lanes, etc. Therefore, the Project would have no impact in relation to this issue. No further analysis is required in the EIR.

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

**Less Than Significant Impact.** The Project site is flat and is not identified as an area subject to landslides (City 2005). Flooding is also not likely to result, as the Project area is flat and free of slopes, such that there would be risks to structures or the environment. Impacts would be less than significant, and no further analysis is required in the EIR.

## XXI. Mandatory Findings of Significance

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

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

**Potentially Significant Impact.** The proposed Project consists of demolition of existing manufacturing and industrial uses, and the subsequent construction and operation of a new warehouse/distribution facility. As discussed in section IV, the site is developed and does not contain native habitat that is endangered or could support endangered species. As such, issues related to fish, wildlife, and sensitive or endangered plant communities are less than significant. Impacts related to history will be addressed in a Cultural Resources Study and further analyzed in the EIR. For the purposes of this Initial Study, impacts associated with these issues are identified as potentially significant.

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

**Potentially Significant Impact.** State CEQA Guidelines Section 15130 requires a discussion of the cumulative impacts of a project when the project’s incremental effect is “cumulatively considerable,” meaning that the project’s incremental effects are considerable when viewed in connection with the

effects of past, current, and probable future projects. Because the proposed Project has the potential for significant impacts to occur, cumulative impacts may also be significant. A cumulative impact analysis will be provided in the EIR.

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

**Potentially Significant Impact.** The proposed Project may cause adverse effects on humans, as identified in the potentially significant issue areas. The EIR will further analyze the necessary issue areas to determine their impact on human beings, either directly or indirectly.

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