
**GENERAL PLAN AND TARGETED ZONING CODE UPDATE
FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS
CITY OF SANTA FE SPRINGS
DRAFT
JANUARY 24, 2022**

1 OVERVIEW AND INTRODUCTION

This statement of Findings of Fact (Findings) addresses the potential environmental effects associated with the City of Santa Fe Springs' General Plan and Targeted Zoning Code Update (GPTZCU), as described in the Draft Program Environmental Impact Report (DEIR) for the GPTZCU. These Findings are made pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] Section 21000 et seq.), specifically PRC Sections 21081, 21081.5, and 21081.6, and the CEQA Guidelines (14 CCR 15000 et seq.), specifically Sections 15091 and 15093. The DEIR examines the full range of potential effects of construction and operation of the GPTZCU and identifies mitigation measures that could be employed to reduce, minimize, or avoid those potential effects.

PRC Section 21081, and CEQA Guidelines Section 15091 require that the lead agency, in this case the City of Santa Fe Springs (City), prepare written findings for identified significant effects, accompanied by a brief explanation of the rationale for each finding. Specifically, CEQA Guidelines Section 15091 states, in part, that:

- a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
 - 1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
 - 2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
 - 3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

In accordance with PRC Section 21081, and CEQA Guidelines Section 15093, whenever significant effects cannot be mitigated to below a level of significance, the decision-making agency is required to balance, as applicable, the benefits of the project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of a project outweigh the unavoidable adverse environmental effects, the adverse effects may be considered "acceptable." In that case, the decision-making agency may prepare and adopt a Statement of Overriding Considerations, pursuant to the CEQA Guidelines.

Section 15093 of the CEQA Guidelines states the following:

- a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.”
- b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the Final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.
- c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

The Final EIR for the GPTZCU identified potentially significant effects that could result from the proposed GPTZCU. The City finds that the inclusion of certain mitigation measures as part of the approval of the proposed GPTZCU would reduce most, but not all, of those effects to less-than-significant levels. Those impacts that are not reduced to less-than-significant levels are identified and overridden due to specific benefits of the GPTZCU (see Section 6, Statement of Overriding Considerations). As required by CEQA, the City, in adopting these Findings, also adopts a Mitigation Monitoring and Reporting Program (MMRP) for the proposed GPTZCU. The City finds that the MMRP, which is incorporated by reference and made part of these Findings, meets the requirements of PRC Section 21081.6 by providing for the implementation and monitoring of measures intended to mitigate potentially significant effects of the proposed GPTZCU.

In accordance with the CEQA Statutes and Guidelines, the City adopts these Findings for the proposed GPTZCU. Pursuant to PRC Section 21082.1(c)(3), these Findings reflect the City's independent judgment as the Lead Agency for the proposed GPTZCU.

2 PROJECT DESCRIPTION

The General Plan and Targeted Zoning Code Update (GPTZCU) is intended to achieve the land use, transportation, housing, and other goals of the City that reflect the community’s growth over the long-term. Table 1 (General Plan Update: Comparison of 2020 and 2040) (identical to Table 3-2 in the Project Description) compares existing 2020 conditions with the projected growth for the 2040 horizon year and includes the City of Santa Fe Springs and its Sphere of Influence (Planning Area). The 2040 planning horizon for the Planning Area is estimated at approximately 16,724 total dwelling units, 60,808 total residents, 79,573,800 total building square feet of non-residential uses, and 60,858 total jobs. The 2040 planning horizon for the Planning Area is estimated to result in increases of approximately 4,572 dwelling units, 364,000 square feet of office space, 383,500 square feet of industrial space, and a reduction of 80,000 square feet of commercial space. An estimated increase of approximately 13,890 residents and 4,788 jobs is also projected for the 2040 horizon year.

**Table 1
General Plan Update: Comparison of 2020 and 2040**

Development Indicators	Existing Conditions (2020)			Future Buildout Conditions (2040)		
	City	SOI	Total	City	SOI	Total
Dwelling Units	5,513	6,639	12,152	9,421	7,303	16,724
Population	18,292	28,626	46,918	30,351	30,457	60,808
Non-Residential Square Feet	76,790,900	1,293,600	78,084,500	78,273,600	1,300,200	79,573,800
Commercial	3,922,700	382,400	4,305,100	3,841,900	382,400	4,224,300
Office	3,203,800	30,900	3,234,700	3,564,200	34,500	3,598,700
Hotels/Motels (SF)	140,000	26,500	166,500	553,900	26,500	580,400
Rooms	150	120	270	900	120	1,020
Industrial	67,743,600	92,500	67,836,100	68,537,100	92,500	68,219,600
Public Facilities/ Institutional	1,780,800	761,300	2,542,100	1,776,600	761,300	2,537,900
Employees	54,716	1,354	56,070	59,321	1,536	60,858
Students	5,446	4,049	9,495	6,638	4,914	11,552

Source: City of Santa Fe Springs, Los Angeles County Assessor’s Data, and General Plan Update GIS data, 2020.

The General Plan Update is intended to achieve the land use, transportation, housing, and other goals of the City that reflect the community’s growth over the long-term. The City of Santa Fe Springs General Plan update succeeds the last comprehensive general plan adopted in 1993 and 1994. The General Plan Update incorporates statutory requirements for general plans and guidance provided in the 2017 General Plan Guidelines; coordinates future development and policies with regional planning efforts and serves as the city’s fundamental guide in developing strategies to address greenhouse gas reduction, climate change, and climate planning.

The EIR incorporates the goals, policies, and objectives of the following Elements from the updated General Plan:

- Land Use Element
- Circulation Element
- Housing Element (2021-2029)
- Open Space and Conservation Element
- Noise Element

- Safety Element
- Environmental Justice Element
- Economic Development Element

These goals, objectives, and policies are intended to maintain various potential environmental effects of the GPTZCU at levels that are less than significant and are considered when evaluating the potential environmental impacts of implementing the General Plan. The Housing Element is updated for the 6th cycle and planned developments identified in the Land Use Element accommodates the Regional Housing Needs Allocation goal of 952 housing units, which represents a 17.3% increase from the existing number of housing units.

The GPTZCU also includes Amendments to Chapter 155 (Zoning) of the Santa Fe Springs Municipal Code (Zoning Map and Zoning Text Amendments) to implement the Land Use Element's Land Use Plan.

In addition to the General Plan and Zoning updates, four Key Opportunity Sites are included in the EIR evaluation. The following describes the possible scenarios for development that could be built within each site.

Washington Boulevard/Norwalk Boulevard Transit-Oriented Development (TOD). This site is located within the triangular blocks between Washington Boulevard, Norwalk Boulevard, and Broadway Avenue bordering the City of Santa Fe Springs and the Los Angeles County unincorporated area of West Whittier-Los Nietos. The area, on the southside of Washington Boulevard, consists of older vehicle-oriented commercial properties and restaurants. A planned Metro Eastside Transit Corridor Phase 2 light rail station (Metro L line) is planned for this segment of Washington Boulevard. The line will connect the current terminus in East Los Angeles to the City of Whittier at Lambert Avenue. The proposed Washington Boulevard Avenue/Norwalk Boulevard Transit-Oriented Development project would allow construction of up to 422 residential units and 38,300 square feet of non-residential building area within multiple buildings with a maximum height of six stories. The ground floor would include pedestrian-oriented commercial uses, such as retail and restaurants, and residential lobbies where residents and guests can access the residences on the upper floors. The project would also include ground floor open space, including a public plaza with seating, landscaping, outdoor dining, and widened sidewalks.

Metrolink Transit-Oriented Development (TOD). This site is located at the northeast corner of Imperial Highway and Bloomfield Avenue bordering the City of Norwalk and across the street from the Norwalk/Santa Fe Springs Transportation Center and Metrolink Station. The project would replace existing commercial, business park, and industrial properties. The proposed Metrolink Transit-Oriented Development project would allow construction of up to 582 residential units and 70,400 square feet of non-residential building area within multiple buildings with a maximum height of six stories. The ground floor would include pedestrian-oriented commercial uses, such as retail and restaurants, and as residential lobbies where residents and guests can access the residences on the upper floors. The project would also include ground floor open space, including a public plaza with seating, landscaping, and widened sidewalks.

MC&C Site. This site is located at the southeast corner of Telegraph Road and Bloomfield Avenue on vacant properties that include active, plugged, idle, and abandoned oil wells and associated pipelines. The proposed MC&C Site project would allow construction of up to 306 residential units and 55,500 square feet of non-residential building area within multiple buildings with a maximum height of four stories. Along Telegraph Road, the ground floor would include commercial uses, such as retail and restaurants and the upper floors will include residential units. Along Bloomfield

Avenue, development would allow standalone residential development and live-work units directly fronting the street. Several oil wells will remain active and will continue to have access for maintenance, but will also be buffered from residential and commercial buildings with walls, fences, berms, etc. as appropriate.

Koontz Site. This site is located between Lakeland Road, Norwalk Boulevard, Fulton Wells Avenue, and Florence Avenue. The project would replace existing industrial properties with up to 156 residential units and 110,500 square feet of commercial or business park development within multiple one- to three-story buildings in height. Residential development will consist of tuck-under residential building types at three stories in height. Commercial development will consist of a neighborhood shopping center with retail, commercial services, and restaurants located at the property on the southwest corner of Florence Avenue and Norwalk Boulevard. The shopping center will include multiple retail pads and an anchor store with a maximum height limit of 25 feet. The commercial use could also be a business park depending on market conditions.

3 RECORD OF PROCEEDINGS

The record of proceedings for the proposed GPTZCU consists of those items listed in CEQA Section 21167.6(e), along with other items contained within the City's files that are relevant to the consideration of the proposed GPTZCU. The record of proceedings for the City's decision on the proposed GPTZCU consists of the following documents, at a minimum and without limitation, which are incorporated by reference and made part of the record supporting these Findings:

- The Notice of Preparation, Notice of Availability, and all other public notices issued by the City in conjunction with the proposed GPTZCU.
- The Draft EIR for the proposed GPTZCU and all technical appendices and documents relied upon or incorporated by reference.
- All written comments submitted by agencies, organizations, and members of the public during the public review comment period on the Draft EIR, and the City's responses to those comments.
- The Final EIR for the proposed GPTZCU.
- The MMRP for the proposed GPTZCU.
- All reports, studies, memoranda, maps, staff reports, and other planning documents relating to the proposed GPTZCU prepared by the City or consultants to the City with respect to the City's compliance with the requirements of CEQA and with respect to the City's action on the proposed GPTZCU.
- All documents submitted to the City by other public agencies and members of the public in connection with the Draft EIR.
- Minutes and verbatim transcripts of all information sessions, public meetings, and public hearings held by the City in connection with the proposed GPTZCU.
- Documentary or other evidence submitted to the City at such information sessions, public meetings, and public hearings.
- All resolutions adopted by the City regarding the proposed GPTZCU, and all staff reports, analyses, and summaries related to the adoption of those resolutions.
- Matters of common knowledge related to the proposed GPTZCU, including, but not limited to, federal, state, and local laws and regulations.
- Any documents expressly cited in these Findings, in addition to those cited above, and any other materials required for the Record of Proceedings by CEQA Section 21167.6(e).

Public Resources Code Section 21081.6(a)(2) requires that the City, as the Lead Agency, specify the location and custodian of the documents of other materials that constitute the record of proceedings upon which its decision has been based. The following location is where review of the record may be performed: Santa Fe Springs Planning Department, 11710 East Telegraph Road, Santa Fe Springs, California 90670.

4 FINDINGS OF FACT

CEQA requires a lead agency to do the following:

- Independently review and analyze the EIR
- Circulate draft documents that reflect its independent judgement
- As part of the certification of an EIR, find that the EIR reflects the independent judgment of the lead agency; and
- Submit copies of the draft EIR to the State Clearinghouse for review and comment by state agencies, if there is a state agency involved or if the proposed project is of sufficient statewide, regional, or areawide environmental significance. (Public Resources Code Section 21082.1[c])

The City of Santa Fe Springs (City) has exercised independent judgment in accordance with the provisions of CEQA Section 21082.1(c) in retaining its own environmental consultant in the preparation of the EIR, as well as reviewing, analyzing, and revising material prepared by the consultant. Having received, reviewed, and considered the information in the EIR, as well as any and all other information in the record, the City hereby makes findings pursuant to and in accordance with CEQA Sections 21081, 21081.5, and 21081.6.

4.1 Effects Determined to Have No Impact or a Less than Significant Impact

The evaluation prepared in the GPTZCU EIR found and provided substantial evidence that certain impacts of the GPTZCU would have no impact or have impacts that are less than significant. The City Council agrees with the characterization of the FEIR with respect to all of the GPTZCU impacts identified as “resulting in no impact” or “less than significant” impacts and finds that those impacts have been described and analyzed accurately and are supported by substantial evidence as described in the FEIR, including the Draft EIR. Reference should be made to the DEIR and FEIR for a more complete description of the findings regarding these impacts. This finding applies to the evaluation of the potential impacts for the following items as further described in the DEIR, that the project will not:

Aesthetics

- Have a substantial adverse effect on a scenic vista.
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within view from a state scenic highway.
- Conflict with applicable zoning and other regulations governing scenic quality.
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Agricultural Resources

- 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.

- Conflict with existing zoning for agricultural use, or a Williamson act contract.
- Conflict with existing zoning for, or cause rezoning of, forest (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)).
- Result in loss of forest land or conversion of forest land to non-forest use.
- 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.

Air Quality

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

Biological Resources

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service.
- 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.
- 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.
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Cultural and Tribal Cultural Resources

- Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5.
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.
- Disturb any human remains, including those interred outside of dedicated cemeteries.

Energy

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

Geology and Soils

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - 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.
 - Strong seismic ground shaking.
 - Seismic-related ground failure, including liquefaction.
 - Landslides.
- Result in substantial soil erosion or the loss of topsoil.
- 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.
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial direct or indirect risks to life or property.
- 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.
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Hazardous and Hazardous Materials

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- 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.
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- 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.
- 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, result in a safety hazard or excessive noise for people residing or working in the Project area.

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Hydrology and Water Quality

- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water supply.
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:
 - result in substantial erosion or siltation on- or off-site.
 - substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.
 - create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.
 - impede or redirect flood flows.
- In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.
- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Land Use and Planning

- Physically divide an established community.
- Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Mineral Resources

- 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.
- 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.

Noise

- 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.
- Generation of excessive groundborne vibration or groundborne noise levels.

- 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.

Population and Housing

- 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).
- Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Public Services

- 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 would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:
 - Fire protection
 - Police protection
 - Schools
 - Parks
 - Other public facilities.

Recreation

- 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.
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Transportation

- Conflict with a program plan, ordinance or policy addressing the circulation system including transit, roadway, bicycle and pedestrian facilities.
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- Result in inadequate emergency access.

Tribal Cultural Resources

- 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 Cultural Native American tribe, and that is:

- Listed or eligible for listing in the California Register of Historical resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Utilities and Service Systems

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

In addition, the DEIR determined that potential impacts with respect to growth-inducing effects and irreversible environmental changes would be less than significant.

4.2 Impacts Determined to Be Less than Significant with Mitigation Incorporated

The Final EIR (including the Draft EIR) identifies the following significant environmental impacts associated with the Project. Based on the environmental analysis of the Project and the identification of feasible mitigation measures, potentially significant impacts have been determined by the City to be reduced to a level of less than significant, and the City has found in accordance with Public Resources Code Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1) that *"changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment."* The descriptions of the impacts in these findings are summary statements. Mitigation Measures are numbered to correspond to listings in the Draft EIR and Final EIR. Reference should be made to the Draft EIR and Final EIR for a more complete description. Based on substantial evidence, the City finds that adoption of the mitigation measures set forth in this section would reduce the identified significant impacts to less than significant.

Hydrology and Water Quality

Section 4.10 (Hydrology and Water Quality) of the EIR identifies potential significant impacts pertaining to groundwater supply but concludes that impacts can be mitigated to less than significant levels.

Impact HYD-2: *Would the GPTZCU substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management for the basin?*

According to the City's Urban Water Management Plan (UWMP), the City provides water service to an area with a 2015 population of about 14,700. The UWMP also estimated the City was projected to have a population of approximately 18,000 by 2040 (note the actual 2020 population is already estimated at 18,292 persons). The estimated future population for the City's service area was based on projections obtained from the Southern California Association of Governments (SCAG). The SCAG data incorporates demographic trends, existing land use, general plan land use policies, and input and projections from the Department of Finance (DOF) and the US Census Bureau at the time those documents were prepared (circa 2015). The UWMP indicated these population estimates were used to prepare its water consumption estimates (p. 3-5, CSFS 2017). Table 3-2 in Section 3, Project Description, of the DEIR provides a comparison of existing City characteristics from 2020 and those estimated for 2040. Table 3-2 estimates the City's population will increase to 30,351 by 2040 which is far in excess of that estimated in the UWMP to adequately supply future growth. In addition, Table 3-2 estimates the total population of the Planning Area will be on the order of 60,808 persons by 2040. Since most of the City's water supply comes from groundwater sources, the growth represented by the proposed GPTZCU exceeds that upon which the UWMP was developed. Therefore, groundwater supply is a potentially significant impact.

Since the last UWMP update in 2015, Southern California's urban water demand has been largely shaped by water conservation efforts to comply with the SBx7-7. This law requires all California retail urban water suppliers serving more than 3,000 acre-feet per year (AFY) or 3,000 service connections to achieve a 20 percent water demand reduction (from a historical baseline) by 2020. The City has been actively engaged in efforts to reduce water use in its service area to meet the 2015 interim 10 percent reduction and the 2020 final water use target. Meeting this target is critical to ensure the City's eligibility to receive future state water grants and loans.

In April 2015 Governor Brown issued an Emergency Drought Mandate as a result of one of the most severe droughts in California's history, requiring a collective reduction in statewide urban water use of 25 percent by February 2016, with each agency in the state given a specific reduction target by DWR. Even with recent water conservation efforts, long-term local groundwater supply is a potentially significant impact.

In addition to overall groundwater supply, there is also a plume of groundwater contamination of PCE and TCE beneath the City that has significantly affected groundwater quality (i.e., the City had to cease operation of its potable water wells). Since local wells are not being used for potable water service, this further restricts the amount of readily available local groundwater that can be used by the City. Future development within the Planning Area under the GPTZCU may also result in increased runoff and pollutant contributions to local groundwater supplies. As stated above, the 1994 General Plan did not contain any specific policies relating to actions to avoid substantially degrading groundwater supply. However, the 1994 General Plan did reference the continuation of several other regulatory/agency mechanisms by which the surface and groundwater are protected by law and policy (See Section 4.10.2). Since 1994, many of these laws and policies have been updated or given additional support to provide more stringent measures to protect surface and groundwater supplies given the historic droughts that have occurred in California since the last City General Plan. One of the most specific laws regarding groundwater, is the Sustainable Groundwater Management Act signed into law in 2014.

Future development under the GPTZCU will comply with the following: General Plan goals and policies regarding water supply and quality; state and regional regulatory requirements; the City's development review process; and City Municipal Code requirements. Even with this compliance, long-term local groundwater supply is a potentially significant impact.

Mitigation Measures

UTL-1 **Water Demand Management.** New developments under the GPTZCU that will be served by local water utility providers will not be approved if they increase water use in excess of what is identified for supply in 2040 under the most recent Urban Water Management Plan for the involved local water providers.

Findings per CEQA Guidelines

With the inclusion of Mitigation Measure UTL-1, the impact would be reduced to a less than significant level.

Facts in Support of Findings Related to Hydrology and Water Quality

By helping remediate existing groundwater contamination, the City will help secure its groundwater supply in the future. The Open Space and Conservation Element of the proposed GPTZCU contains Goal COS-4 which strives to achieve clean groundwater supplies. In support of that goal, Policy COS-4.1 focuses on helping clean up the groundwater contamination plume currently beneath the City, while Policies COS-4.2 and COS-4.3 address cleaning up contaminated soils and regulating future land uses to help improve future groundwater quality. Policy COS-4.4 requires that new development incorporate water quality features into site drainage plans that reduce impermeable surface area, increase surface water infiltration, and minimize surface water runoff during storm events which will also help improve groundwater quality. In addition, the Infrastructure portion of the Circulation Element contains Goal C-12 and its supporting Policy C-12.7 which requires the City to update its Urban Water Management Plan consistent with the California Urban Water Management Planning Act. Other policies under this goal encourage various methods of conservation to help reduce overall water consumption and reduce potential urban contamination that reaches the groundwater. With implementation of Mitigation Measure UTL-1 and these General Plan goals and policies, and continued regulatory compliance with state and regional water quality standards, development within the Planning Area under the GPTZCU, including the key opportunity sites, will result in less than significant impacts related to groundwater supply.

Utilities and Service Systems

Section 4.19 (Utilities and Service Systems) of the EIR identifies potential significant impacts pertaining to expanded water facilities, water supplies, and cumulative impacts but concludes that impacts can be mitigated to less than significant levels.

Impact UTIL-1: Would the GPTZCU 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?

The implementation of the GPTZCU would likely result in both new and expanded water supply and distribution facilities. The City's water supply comes from five different water purveyors which include both groundwater and imported surface water supplies. The City of Santa Fe Springs Water Utility Authority serves the largest number of City residents.

According to the City's Urban Water Management Plan (UWMP), the City provides water service to an area with a 2015 population of about 14,700. The UWMP also estimated the City was projected to have a population of approximately 18,000 by 2040 (note the actual 2020 population is already estimated at 18,292 persons). The SCAG data incorporates demographic trends, existing land use, general plan land use policies, and input and projections from the Department of Finance (DOF) and the US Census Bureau at the time those documents were prepared (circa 2015). The UWMP indicated these population estimates were used to prepare its water consumption estimates (p. 3-5, CSFS 2017).

Table 3-2 in Section 3, Project Description, of the DEIR provides a comparison of existing City characteristics from 2020 and those estimated for 2040. Table 3-2 estimates the City's population will increase to 30,351 by 2040 which is far in excess of that estimated in the 2015 UWMP to adequately supply future growth. In addition, Table 3-2 estimates the total population of the Planning Area will be 60,808 persons by 2040. Since most of the City's water supply comes from groundwater sources, the growth represented by the proposed GPTZCU exceeds that upon which the UWMP was developed. Therefore, groundwater supply is a potentially significant impact.

Since the last UWMP update in 2015, southern California's urban water demand has been largely shaped by water conservation efforts to comply with SBx7-7. This law requires all California retail urban water suppliers serving more than 3,000 acre-feet per year (AFY) or 3,000 service connections to achieve a 20 percent water demand reduction (from a historical baseline) by 2020. The City had been actively engaged in efforts to reduce water use in its service area to meet the 2015 interim 10 percent reduction and the 2020 final water use target. Meeting this target is critical to ensure the City's eligibility to receive future state water grants and loans.

In April 2015 Governor Brown issued an Emergency Drought Mandate as a result of one of the most severe droughts in California's history, requiring a collective reduction in statewide urban water use of 25 percent by February 2016, with each agency in the state given a specific reduction target by DWR. However, even with recent water conservation efforts, long-term local groundwater supply is a potentially significant impact.

In addition to overall groundwater supply, there is also a plume of groundwater contamination of PCE and TCE beneath the region including the City that has significantly affected local groundwater quality (i.e., the City had to cease operation of its potable water wells). Since local wells are not being used for potable water service, this further restricts the amount of readily available local groundwater that can be used by the City. Future development within the Planning Area under the GPTZCU may also result in increased runoff and pollutant contributions to local groundwater supplies. The 1994 General Plan did not contain any specific policies relating to actions to avoid substantially degrading groundwater supply. However, the 1994 General Plan did reference the continuation of several other regulatory/agency mechanisms by which the surface and groundwater are protected by law and policy (See Section 4.10.2 of the DEIR). Since 1994, many of these laws and policies have been updated or given additional support to provide more stringent measures to protect surface and groundwater supplies given the historic droughts that have occurred in California since the last City General Plan.

Future development under the GPTZCU will comply with the following: General Plan goals and policies regarding water supply and quality; state and regional regulatory requirements; the City's development review process; and City Municipal Code requirements. Even with this compliance, long-term local groundwater supply is a potentially significant impact due to the expected level of growth by 2040.

Impact UTIL-2: *Would there be sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?*

The availability of water supplies is discussed in Impact UTL-1. The GPTZCU is expected to require more water than is currently identified in the most recent UWMP. The implementation of the GPTZCU would likely result in both new and expanded water supply and distribution facilities. Future development under the GPTZCU will comply with the following: General Plan goals and policies regarding water supply and quality; state and regional regulatory requirements; the City's development review process; and City Municipal Code requirements. Even with this compliance, long-term local water supply is a potentially significant impact that requires mitigation. Therefore, the impacts with respect to water supplies are potentially significant and require mitigation.

Mitigation Measures

UTL-1 **Water Demand Management.** New developments under the GPTZCU that will be served by local water utility providers will not be approved if they increase water use in excess of what is identified for supply in 2040 under the most recent Urban Water Management Plan for the involved local water providers.

Findings per CEQA Guidelines

With the inclusion of Mitigation Measure UTL-1, the impact to the water supply would be reduced to a less than significant level.

Facts in Support of Findings Related to Utilities and Service Systems

The infrastructure portion of the Circulation Element contains Goal C-12 which indicates the City's desire for a sustainable and reliable water supply. Policy C-12.1 emphasizes maintaining an adequate water supply including resilience against climate change conditions. Policies C-12.2 and 12.9 encourage water conservation, while Policy C-12-7 supports updating local UWMPs as needed to accommodate planned growth. Policy C-12-3 focuses on expanding the use of reclaimed water to free up potable supplies, and Policies C-12.6 and 12.8 require the City to maintain and upgrade its water infrastructure as necessary for future growth. Water conservation helps reduce overall water consumption and reduce potential urban contamination that reaches the groundwater. By helping remediate existing groundwater contamination, the City will help secure its groundwater supply in the future. The Open Space and Conservation Element of the proposed GPTZCU contains Goal COS-4 which strives to achieve clean groundwater supplies. In support of that goal, Policy COS-4.1 focuses on helping clean up the groundwater contamination plume currently beneath the City, while Policies COS-4.2 and COS-4.3 address cleaning up contaminated soils and regulating future land uses to help improve future groundwater quality. Policy COS-4.4 requires that new development incorporate water quality features into site drainage plans that reduce impermeable surface area, increase surface water infiltration, and minimize surface water runoff during storm events which will also help improve groundwater quality. Safety Element Goal S-1 and its supporting Policy S-1.7 indicates the City

will strive to maintain its utility infrastructure including its water lines. With implementation of Mitigation Measure UTL-1 and these General Plan goals and policies, and continued regulatory compliance with state and regional water quality standards, development within the Planning Area under the GPTZCU, including the key opportunity sites, will not result in significant impacts related to groundwater supply.

4.3 Impacts Determined to be Significant and Unavoidable

As presented in the GPTZCU EIR, the City finds that impacts pertaining to criteria pollutant emissions, generation of significant GHG emissions, and vehicle miles travelled (VMT) cannot be mitigated to a less than significant level because no feasible mitigation is available.

Air Quality

Section 4.3 (Air Quality) of the EIR identifies potentially significant impacts pertaining to the emission of criteria pollutants and concludes that these impacts cannot be mitigated to less than significant levels.

IMPACT AIR-1: Implementation of the proposed GPTZCU would generate construction and operational emissions such that the project would conflict with the applicable air quality plan.

As described in Section 4.3.1 of the DEIR, the proposed GPTZCU is within the South Coast Air Basin, which is under the jurisdiction of the SCAQMD. Pursuant to the methodology provided in Chapter 12 of the SCAQMD *CEQA Air Quality Handbook*, consistency with the AQMP is affirmed if the project:

- 1) Is consistent with the growth assumptions of the AQMP; and
- 2) Does not increase the frequency or severity of an air quality standards violation, or cause a new one.

As shown in Table 4.3-6 of the DEIR, the anticipated population growth under the implementation of the proposed GPTZCU would exceed SCAG's growth potential by more than twice the amount accounted for by the 2016 RTP/SCS, while the new employment would not. Therefore, from a population growth standpoint, the proposed GPTZCU would be inconsistent with the AQMP. In addition, as shown in Table 4.3-7 of the DEIR, maximum daily operational emissions associated with potential 2040 growth under the GPTZCU would exceed the SCAQMD's recommended regional pollutant thresholds for ROG and NO_x. As described in Section 4.3.1, the South Coast Air Basin is designated nonattainment for national and state ozone standards, and NO_x is an ozone precursor pollutant and the project exceedance of these thresholds would conflict with the AQMP because it hinders attainment for ROG and NO_x. This conflict with the AQMP is considered a potentially significant impact and the EIR includes the mitigation measures listed below to reduce ROG and NO_x emissions.

Mitigation Measures

AQ-2A Require a Project-level Air Quality Assessment for Conditional Uses and New Discretionary Development Projects

Applicants shall submit a quantitative project-level criteria air pollutant and toxic air contaminant emissions analysis for conditional uses and new discretionary

development projects. The project-level assessment shall address both construction and operational emissions. The estimated criteria air pollutant and toxic air contaminant emissions shall be compared against the thresholds of significance maintained by the South Coast Air Quality Management District (SCAQMD) and, if emissions are shown to be above SCAQMD thresholds, the City shall require the implementation of mitigation to reduce emissions. The project-level assessment, and identification of necessary mitigation, shall be prepared prior to discretionary project approval. Mitigation measures to reduce emissions could include, but are not limited to:

- Selection of specific construction equipment (e.g., specialized pieces of equipment with smaller engines or equipment that will be more efficient and reduce engine runtime);
- Requiring equipment to use alternative fuel sources (e.g., electric-powered and liquefied or compressed natural gas), meet cleaner emission standards (e.g., U.S. EPA Tier IV Final emissions standards for equipment greater than 50-horsepower), and/or utilizing added exhaust devices (e.g., Level 3 Diesel Particulate Filter);
- Minimizing the idling time of diesel-powered construction equipment to two minutes; and
- Application of Low-VOC paints to interior and/or exterior surfaces (e.g., paints that meet SCAQMD Rule 1113 “Low-VOC” or “Super-Compliant” requirements).

AQ-2B Prohibit the Installation of Natural Gas Hearths in New Residential Development

The City shall prohibit the installation of new natural gas hearths/fireplaces in new residential development. Natural gas hearths/fireplaces may be incorporated into remodels / redevelopment if the existing structure(s) proposed for remodel / redevelopment featured natural gas hearths/fireplaces; however, the number of natural gas hearths/fireplaces provided by the new structure(s) may not exceed that present prior to the remodel / redevelopment and must meet the most recent U.S. EPA, CARB, and/or SCAQMD emissions standards in effect at the time of building permit issuance.

AQ-2C Residential Electric Vehicle and Bicycle Parking Requirements

The following Residential and Non-Residential Voluntary Measures from the CalGreen Code (Appendix A4) shall apply and be required for new residential (or residential mixed-use) development projects located in the City:

- New one and two-family dwellings and townhomes shall include electric vehicle infrastructure consistent with Section A4.106.8.1 of the CalGreen Code.
- New multi-family dwellings with 17 or more units shall provide electric vehicle charging spaces capable of supporting electric vehicle supply equipment pursuant to Section A4.106.8.2.
- New multi-family dwelling units shall provide bicycle parking pursuant to Section A4.106.9.2.

AQ-2D Non-Residential Electric Vehicle and Bicycle Parking Requirements

The following Non-Residential Voluntary Measures from the CalGreen Code (Appendix A5) shall apply and be required for new non-residential (or mixed-use) development projects located in the City:

- New non-residential development with more than 10 tenant-occupants shall provide changing/shower facilities for tenant-occupants in accordance with Table A5.106.4.3 of the CalGreen code.
- New non-residential development shall provide designated parking for any combination of low-emitting, fuel-efficient, and carpool/van pool vehicles pursuant to the Tier 1 requirements of Table A5.106.5.1.1 of the CalGreen code. Such parking spaces shall be marked pursuant to Section A5.106.5.1.3 of the CalGreen code.
- New non-residential development shall provide electric vehicle charging spaces capable of supporting electric vehicle supply equipment pursuant to the Tier 1 requirements of Section A5.106.5.3.1 of the CalGreen code. Such spaces shall be marked pursuant to Section A5.106.5.3.3 of the CalGreen code.

AQ-2E Transportation Demand Management

The City shall require all new residential and non-residential development that meets the following criteria incorporate measures to meet vehicle trip generation rates that are twenty percent lower than the standard rates as established in the most recent edition of the Institute of Transportation Engineers (ITE) trip generation manual:

- New multi-unit development of ten units or more;
- New non-residential development of ten thousand square feet or more;
- Additions to non-residential buildings that are ten thousand square feet or more in size that expand existing gross floor area by ten percent or more; and
- Establishment of a new use, change of use, or change in operational characteristics in a building that is ten thousand square feet or more in size that results in an average daily trip increase of more than ten percent of the current use, based on the most recent Institute of Traffic Engineers (ITE) trip generation rates.

Findings per CEQA Guidelines

Despite inclusion of Mitigation Measures AQ-2A through AQ-2E, the identified impacts related to air quality would remain significant and unavoidable.

Facts in Support of Findings Related to Air Quality

The population growth that could occur under the GPTZCU by 2040 would be inconsistent with the 2016 RTP/SCS growth forecast. As discussed under Impact AQ-2, the project would implement Mitigation Measure AQ-2A, which would require the preparation of a project-specific air quality study prior to future development activities and mitigation incorporated into the project if emissions are shown to be above SCAQMD-recommended CEQA significance thresholds. Nonetheless, because it cannot be definitively known or stated at this time that construction emissions would be able to be mitigated such that all criteria air pollutant emissions would be

below SCAQMD-recommended thresholds of significance, implementation of the proposed GPTZCU could still increase the frequency and/or severity of air quality violations in the Basin or otherwise impede attainment of air quality standards in the Basin. Furthermore, operational ROG emissions would continue to exceed SCAQMD thresholds, even after the incorporation of Mitigation Measures AQ-2B through AQ-2E. For these reasons, the proposed GPTZCU would be inconsistent with the AQMP. Therefore, this impact is considered a significant and unavoidable.

IMPACT AIR-2: Implementation of the proposed GPTZCU would result in a cumulatively considerable net increase in ROG and NO_x emissions during both construction and operation.

The analysis conducted under Impact AQ-2 demonstrates that the unmitigated net change in operational emissions between existing land uses and those proposed by the GPTZCU would exceed the SCAQMD's operational Reactive Organic Gases (ROG) and Nitrogen Oxides (NO_x) CEQA thresholds of significance. Construction activities would also have the potential to exceed SCAQMD-recommended thresholds of significance. Since the proposed GPTZCU could result in construction and operational emissions that exceed SCAQMD regional CEQA thresholds, the proposed GPTZCU could increase the frequency and/or severity of air quality violations in the Basin or otherwise impede attainment of air quality standards, particularly national and state ozone standards. The exceedances of SCAQMD operational thresholds for ROG and NO_x represent potentially significant impacts that require mitigation. The EIR includes Mitigation Measures AQ-2A through AQ-2E to reduce potential impacts.

Findings per CEQA Guidelines

Despite inclusion of Mitigation Measures AQ-2A through AQ-2E, the identified impacts related to air quality would remain significant and unavoidable.

Facts in Support of Findings Related to Air Quality

As discussed under Impact AQ-2, the project would implement Mitigation Measure AQ-2A, which would require the preparation of a project-specific air quality study prior to future development activities and mitigation incorporated into the project if emissions are shown to be above SCAQMD-recommended CEQA significance thresholds. Because it cannot be definitively known or stated at this time that construction emissions would be able to be mitigated such that all criteria air pollutant emissions would be below SCAQMD-recommended thresholds of significance, implementation of the proposed GPTZCU could still increase the frequency and/or severity of air quality violations in the Basin or otherwise impede attainment of air quality standards in the Basin. Furthermore, operational ROG emissions would continue to exceed SCAQMD thresholds, even after the incorporation of Mitigation Measures AQ-2B through AQ-2E. For these reasons, the proposed GPTZCU would result in a cumulatively considerable net increase of criteria pollutants. Therefore, this impact is considered a significant and unavoidable.

Greenhouse Gas Emissions

Section 4.8 (Greenhouse Gases) of the EIR identifies potentially significant impacts pertaining to the emission of greenhouse gases and concludes that these impacts cannot be mitigated to less than significant levels.

IMPACT GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

As shown in Table 4.8-4 of the DEIR, the Planning Area would emit approximately 585,021 MTCO₂e annually by 2040. The primary source of GPTZCU GHG emissions would be mobile sources, which represent approximately 58% of total annual GHG emissions occurring under 2040 growth conditions. The next highest source of GPTZCU GHG emissions would be energy sources, which would represent approximately 24% of total annual GHG emissions. Dividing through by the Planning Area's service population (121,666 residents and employees) results in an efficiency metric of 4.8 MTCO₂e/yr/SP for 2040. Although this GHG efficiency level does not meet the adjusted target for 2040 (2.6 MTCO₂e/yr/SP), it does show an appreciable reduction from existing and future baseline conditions (the GHG efficiency occurring under 2040 with the GPTZCU would be approximately 47% less than existing 2020 conditions and 13% less than 2040 conditions without the GPTZCU). Nevertheless, this impact is considered potentially significant and the mitigation measures listed below were incorporated to reduce potential impacts.

Mitigation Measures

Mitigation Measures AQ-2B, AQ-2C, AQ-2D, and AQ-2E.

GHG-1A Consider Adoption of a Zero Net Energy Ordinance. Within two years of the adoption of the GPTZCU, the City shall consider and evaluate the feasibility of adopting an ordinance that amends the City's Municipal Code to require all new residential and/or non-residential development subject to Title 24, Part 6 of the California Building Code to achieve Zero Net Energy (ZNE) standards. If the City finds ZNE technology, programs, and/or other strategies are feasible and cost-effective, the City shall adopt a ZNE ordinance as expeditiously as possible given City resources. As defined by the California Energy Commission (CEC), ZNE standards require the value of the net energy produced by project renewable energy resources equals the value of the energy consumed annually by the project, using the CEC's Time Dependent Valuation (CEC, 2015).

GHG-1B Consider the Preparation and Adoption of a Climate Action Plan. To implement General Plan Policy OSC-4.3, the City of Santa Fe Springs shall consider preparing and adopting a Climate Action Plan (CAP) within two years of adoption of the GPTZCU that:

- 1) Establishes a community-wide greenhouse gas emissions inventory for a single, historic calendar year (e.g., the current year for which the CAP is being prepared).
- 2) Quantifies greenhouse gas emissions, both existing and proposed over a specified time period. The time period forecasted shall be no less than the Year 2040. Additional, forecasted years (e.g., 2030, 2035, etc.) may be included.
- 3) Identifies annual, community-wide greenhouse gas emission reduction targets (i.e., in MTCO₂e) and/or efficiency targets (i.e., in MTCO₂e per service population and/or capita) that align the City's emissions with legislatively adopted State-wide greenhouse gas reduction targets (e.g., AB 32 and SB 32) for a specified calendar year. For a calendar year beyond that which has a legislatively adopted greenhouse gas reduction target, the greenhouse gas emissions reduction goal for 2050 outlined in EO S-3-05 shall be used as a future benchmark. The identified annual, community-wide greenhouse gas emissions target for the City may be an interpolated value based on legislatively adopted State-wide greenhouse gas reduction targets and those issued by Executive Order.

- 4) Specifies measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified annual, community-wide greenhouse gas emission reduction targets and/or efficiency targets.
- 5) Establishes a mechanism to monitor the plan's progress toward achieving its community-wide greenhouse gas emission reduction targets and/or efficiency targets, and requires amendment if the CAP is not achieving specified levels.
- 6) Be adopted in a public process following environmental review.

GHG-1C Require a Project-level Greenhouse Gas Emissions Assessment for Conditional Uses and New Discretionary Development Projects.

Applicants shall submit a project-level greenhouse gas (GHG) emissions analysis for conditional uses and new discretionary development projects. The GHG emissions analysis shall evaluate the project's consistency with adopted state-wide GHG emissions reduction goals, such as Senate Bill 32, EO S-3-05, or interpolated GHG emission reduction goal for 2040 that is based on state-wide GHG emissions reduction goals (e.g., an interpolated SCAQMD efficiency metric of 2.6 MTCO₂e/yr/SP). If the project's GHG emissions are found to be inconsistent with state-wide GHG emission reduction goals, mitigation shall be identified and implemented to reduce emissions. The project-level GHG emissions analysis shall fully address the project's GHG emissions impacts using the checklist questions contained in the CEQA Guidelines Appendix G, Item VIII, Greenhouse Gas Emissions. Mitigation measures to reduce emissions could include, but are not limited to:

- Increasing the energy efficiency of the proposed building(s) (e.g., identifying building practices that go beyond CalGreen Code standards, identifying specific energy efficient appliances, etc.);
- Incorporating on-site renewable energy generation into project-design;
- Reducing the quantity of parking provided by the proposed development; and
- Reducing indoor and outdoor potable water consumption.

Findings per CEQA Guidelines

Despite inclusion of Mitigation Measures AQ-2B through AQ-2E and GHG-1A through GHG-1C, the identified impacts related to greenhouse gas emissions would remain significant and unavoidable.

Facts in Support of Findings Related to Greenhouse Gas Emissions

The GPTZCU includes goals and policies that promote mixed-use developments, transportation demand strategies, expansion of transit service, and other actions that reduce transportation-related GHG emissions. The GPTZCU also includes goals and policies that encourage sustainable and green development that reduce energy-related GHG emissions. Although the GPTZCU contains numerous goals and policies that highlight the City's intent to grow sustainably over the next couple decades, further actions are required to reduce GHG emissions. Accordingly, the City would implement Mitigation Measures AQ-2B, AQ-2C, AQ-2D, AQ-2E, as well as GHG-1A, GHG-1B, and GHG-1C to reduce the quantity of GHG emissions generated under implementation of the GPTZCU. As shown in Table 4.8-5 of the DEIR, the mitigated GPTZCU GHG emissions estimates would continue to exceed the adjusted SCAQMD derived plan-level

efficiency metric. Although the implementation of Mitigation Measures AQ-2B through AQ-2E would reduce the GHG emissions generated in the Planning Area, the GPTZCU's effect on GHG emissions would remain significant and unavoidable for a number of reasons. First, it is unknown how many projects would be subject to Mitigation Measures AQ-2C, AQ-2D, AQ-2E, GHG-1A, GHG-1B, and GHG-1C. Second, it is uncertain at this time if the ZNE provisions called out in Mitigation Measure GHG-1A would be adopted by the City or what GHG emissions reductions would be attributable to measures identified in the Climate Action Plan (see Mitigation Measure GHG-1B). For example, with regard to adopting a ZNE ordinance, the CEC identified in its May 20, 2017 staff workshop on the 2019 building efficiency standards ZNE strategy that ZNE was not a cost-effective standard for the 2019 Title 24 Building Code update, because, as the electric grid becomes greener in the future, rooftop PVs will have diminished carbon reduction benefits. In order to achieve ZNE, the electrification of homes will have to be coupled with grid harmonization strategies, such as consumer owned storage. As of the CEC's workshop in 2017, customer owned storage was still too expensive to be cost effective for the 2019 Title 24 standards (CEC 2017). In addition, banning natural gas as an energy source may be precluded under Federal law. Finally, although Mitigation Measure GHG-1C would require a project-level evaluation for future discretionary projects proposed under implementation of the GPTZCU, it cannot be assured at this time that every single one of those projects would be able to mitigate their emissions in line with state-wide goals. Since the GHG emissions reductions attributable to Mitigation Measures AQ-2C, AQ-2D, AQ-2E, GHG-1A, GHG-1B, and GHG-1C cannot be definitively assessed at this time, and since the GHG emissions reductions associated with Mitigation Measure AQ-2B do not meet the interpolated SCAQMD efficiency metric of 2.6 MTCO₂e/yr/SP, this impact would be significant and unavoidable.

IMPACT GHG-2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

As described under Impact GHG-1, the GPTZCU's estimated GHG efficiency level does not meet the adjusted target for 2040 (2.6 MTCO₂e/yr/SP); therefore, the Project would result in a conflict with the applicable RTP/SCS Scoping Plan and requires mitigation. Therefore, Mitigation Measures AQ-2B through AQ-2E and GHG-1A through GHG-1C were incorporated to reduce potential impacts.

Findings per CEQA Guidelines

Despite inclusion of Mitigation Measures AQ-2B through AQ-2E and GHG-1A through GHG-1C, the identified impacts related to greenhouse gas emissions would remain significant and unavoidable.

Facts in Support of Findings Related to Greenhouse Gas Emissions

The GPTZCU includes goals and policies that promote mixed-use developments, transportation demand strategies, expansion of transit service, and other actions that reduce transportation-related GHG emissions. The GPTZCU also includes goals and policies that encourage sustainable and green development that reduce energy-related GHG emissions. Although the GPTZCU contains numerous goals and policies that highlight the City's intent to grow sustainably over the next couple decades, further actions are required to reduce GHG emissions. Accordingly, the City would implement Mitigation Measures AQ-2B, AQ-2C, AQ-2D, AQ-2E, as well as GHG-1A, GHG-1B, and GHG-1C to reduce the quantity of GHG emissions generated under implementation of the GPTZCU. As shown in Table 4.8-5 of the DEIR, the mitigated GPTZCU

GHG emissions estimates would continue to exceed the adjusted SCAQMD derived plan-level efficiency metric. Although the implementation of Mitigation Measures AQ-2B through AQ-2E would reduce the GHG emissions generated in the Planning Area, the GPTZCU's effect on GHG emissions would remain significant and unavoidable for a number of reasons. First, it is unknown how many projects would be subject to Mitigation Measures AQ-2C, AQ-2D, AQ-2E, GHG-1A, GHG-1B, and GHG-1C. Second, it is uncertain at this time if the ZNE provisions called out in Mitigation Measure GHG-1A would be adopted by the City or what GHG emissions reductions would be attributable to measures identified in the Climate Action Plan (see Mitigation Measure GHG-1B). For example, with regard to adopting a ZNE ordinance, the CEC identified in its May 20, 2017 staff workshop on the 2019 building efficiency standards ZNE strategy that ZNE was not a cost-effective standard for the 2019 Title 24 Building Code update, because, as the electric grid becomes greener in the future, rooftop PVs will have diminished carbon reduction benefits. In order to achieve ZNE, the electrification of homes will have to be coupled with grid harmonization strategies, such as consumer owned storage. As of the CEC's workshop in 2017, customer owned storage was still too expensive to be cost effective for the 2019 Title 24 standards (CEC 2017). In addition, banning natural gas as an energy source may be precluded under Federal law. Finally, although Mitigation Measure GHG-1C would require a project-level evaluation for future discretionary projects proposed under implementation of the GPTZCU, it cannot be assured at this time that every single one of those projects would be able to mitigate their emissions in line with state-wide goals. Since the GHG emissions reductions attributable to Mitigation Measures AQ-2C, AQ-2D, AQ-2E, GHG-1A, GHG-1B, and GHG-1C cannot be definitively assessed at this time, and since the GHG emissions reductions associated with Mitigation Measure AQ-2B do not meet the interpolated SCAQMD efficiency metric of 2.6 MTCO_{2e}/yr/SP, this impact would be significant and unavoidable.

Transportation

IMPACT TRANS-2: Would the GPTZCU conflict or be inconsistent with CEQA guidelines section 15064.3, subdivision (b)? [regarding VMT]

Under Existing Conditions, the service population of 103,150 in the City and Sphere of Influence generates 3,414,318 vehicle miles traveled (VMT), including auto and trucks. This results in 33.1 VMT per service population, 17.2 Home-Based VMT per capita for residential land uses, and 18.1 Home-Based Work VMT per employee for employment land uses. Under Cumulative Base 2040 Conditions, the service population of 112,084 shows a decrease in total VMT to 3,294,172. This results in 29.4 VMT per service population, 15.1 VMT per resident for residential land uses, and 17.2 VMT per employee for employment land uses. Under the Cumulative Plus Project 2040 Conditions, VMT increases to reflect additional development in the City of Santa Fe Springs. The service population of 117,761, generates 3,345,193 total VMT. This results in 29.5 VMT per service population, 15.8 VMT per resident for residential land uses, and 17.3 VMT per employee for employment land uses.

Table 4.17-4 (VMT Impact Thresholds) of the DEIR shows the 15% threshold targets when applied to existing VMT levels. Overall, the analysis shows that the SCAG model predicts VMT per capita to decrease in the future due to increased development densities and transportation patterns. However, VMT per capita in California has continued to increase over the last several years and it is uncertain how much this trend will change over time. Analysis of VMT per service population provides a coarse assessment of how trips, which are not all home-based, affect reported VMT efficiency. Precise methodologies for calculating this metric in traffic impact studies are still being developed and are therefore less reliable. The per service population metric

includes all per capita trips, but also includes all trips into or out of the City, even if these do not originate from a home in the City. The per capita metric provides a measure of travel efficiency and helps depict whether people are traveling by vehicle more or less over time and can also be used to compare the VMT efficiency of different areas.

At this time, the City of Santa Fe Springs cannot demonstrate that VMT will be reduced to the degree that it meets state goals related to VMT reduction. VMT reduction depends on a variety of factors, such as demographic change, household preferences for housing types and locations, the cost of fuel, and the competitiveness of regional transit relative to driving, which relates to congestion along vehicular commute routes that are not under the City's jurisdiction, and transit provided by agencies other than the City. Further, the California Air Resources Board (CARB), who has led much of the progress towards achieving emission reductions from the transportation sector, has not gathered sufficient data to determine the effectiveness of the assumed reductions. The feasibility and effectiveness of VMT mitigation measures such as a local or regional VMT impact bank or exchange is unknown at this time. Although the findings for the Project impacts indicates the Project is beneficial for VMT efficiency and meets is expected to produce VMT at a rate that would not result in a significant impact, the model is not sensitive to many of the factors that affect VMT per person. Given that this information, and the information presented by CARB related to the trend of VMT growth across the state (going up when the regional models predict that it should be decreasing) points to the uncertainty of the model in predicting VMT, the VMT impact is considered potentially significant.

Future Project Mitigation

Future projects consistent with the Housing Element will not require further VMT analysis, pursuant to the tiering provisions of CEQA. However, the significance threshold of 24.7 VMT/service population can be used for future land use amendments or other projects not within the scope of the EIR analysis. CEQA Guidelines Section 15064.3(b) allows lead agencies discretion to determine, in the context of a particular project, whether to rely on a qualitative analysis or performance-based standards. CEQA Guidelines Section 15064.7(b) allows lead agencies the discretion to select their own thresholds and allow for differences in thresholds based on context. Lead agencies also may need to balance multiple goals, such as accommodation of housing needs that may also contribute to VMT increases. Adding more impact mitigation costs to suburban housing projects may be counter to land use diversity and adequate/affordable housing goals.

The types of mitigation that affect VMT are those that reduce the number of single-occupant vehicles generated by the project. This can be accomplished by changing the land uses being proposed or by implementing Transportation Demand Management (TDM) strategies. TDM strategies have been determined to be among the most effective VMT impact mitigators. TDM strategies are reductions available from certain types of project site modifications, programming, and operational changes. The effectiveness of identified TDM strategies is based primarily on research documented in the 2010 California Air Pollution Control Officers Association (CAPCOA) publication, Quantifying Greenhouse Gas Mitigation Measures (CAPCOA, 2010). The strategies described in Table 4.17-5 (Transportation Demand Management Strategies) of the DEIR are a sample of the options most effective in areas like the City of Santa Fe Springs.

The CAPCOA document contains detailed equations on applying these TDM reductions given the land use type and built environment context. In addition, some TDM strategies have complementary benefits on reducing VMT and need to be considered in combination and not

individually. Although SB 743 does not give guidance for assessing truck VMT and reduction strategies, Table 4.17-5 presents city-level TDM strategies that can help minimize VMT impacts. Specific VMT mitigation strategies will need to be tailored to the project characteristics and their effectiveness needs to be analyzed and documented as part of the environmental review process to determine if impacts could be mitigated or if they would remain significant and unavoidable. Given that research on the effectiveness of TDM strategies is continuing to evolve, feasible mitigation measures should be considered based on the best data available at the time a project is being considered by the City and documented accordingly in the Transportation Study Guidelines.

Mitigation Measures

There is no feasible mitigation at the programmatic level.

Findings per CEQA Guidelines

Because there is no feasible mitigation at the programmatic level, this impact is considered significant and unavoidable.

Facts in Support of Findings Related to Transportation

Goal C-8 of the Circulation Element and its policies will support the City's efforts in the future to reduce and minimize additional VMT within the City and surrounding areas. Policy C-8.1 will help integrate transportation and land use decisions to reduce vehicle miles traveled and greenhouse gas emissions. Policy C-8.2 will identify the most appropriate transportation management strategies to reduce VMT. Policy C-8.3 will encourage businesses to provide employee incentives to utilize alternatives to conventional automobile travel (i.e., carpools, vanpools, buses, cycling, and walking). In addition, Policy C-8.4 will encourage the implementation of employer transportation demand management requirements included in the South Coast Air Quality Management District's Regulations. Policy C-8.5 encourages employee work hour variability, Policy C-8.6 encourages ridesharing, and Policy C-8.7 requires the City to consult with Caltrans regarding freeway improvements that can affect City roadways and businesses. Based on the availability of non-vehicular transportation options outlined in the proposed GPTZCU Circulation Goals C-1 through C-11 and their attendant policies (shown above in Section 4.17.2), the proposed GPTZCU will help reduce VMT within the City and Planning Area to the greatest extent feasible at this time. In the future, specific mitigation implemented on specific development projects may ultimately help reduce the City's VMT to below regional thresholds. However, at this time for this programmatic CEQA level analysis, the GPTZCU will conflict and be inconsistent with CEQA guidelines section 15064.3, subdivision (b) because it will not reduce City-wide VMT below regional thresholds. For these reasons impacts are significant and unavoidable.

4.4 Conclusion with Respect to Impacts that Cannot be Mitigated

The City finds, based on the facts set forth in the administrative record, which include but are not limited to the facts as set forth below, those facts contained in the DEIR, and any other facts set forth in materials prepared by the City or the City's consultants, that there are no additional, feasible mitigation measures, changes, or alternative available to reduce the significant and unavoidable impacts identified above, beyond those identified in the mitigation measures adopted for the project. Therefore, as outlined in Public Resource Code Section 21081(b) and State CEQA Guidelines Section 15093, adoption of the Project will require a Statement of Overriding Considerations for impacts pertaining to emissions of criteria pollutants and greenhouse gases,

conflicts with applicable air quality and climate change plans, and excessive VMT, which is included with these Findings. As fully described in the Statement of Overriding Considerations (Section 6 herein), the City has concluded and hereby finds and declares that, based on substantial evidence, that the project's significant and unavoidable impacts are outweighed by the Project's benefits, including but not limited to the Project's significant benefits to the residents of the City of Santa Fe Springs. Accordingly, based on substantial evidence in the DEIR and the administrative record, the City finds and declares, pursuant to State CEQA Guidelines Section 15091(a)(3), that specific economic legal, social, technical or other considerations, including accomplishing the Project objectives, make infeasible any additional mitigation measures or Project alternatives identified in the DEIR.

5 FINDINGS OF PROJECT ALTERNATIVES

Section 15126.6 of the CEQA Guidelines requires an EIR to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." The section also states that "the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if those alternatives would impede to some degree the attainment of the project objectives, or would be more costly." Under Section 15126.6(a) of the CEQA Guidelines, an EIR does not need to consider alternatives that are not feasible, nor need it address every conceivable alternative to the project. The range of alternatives "is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." (CEQA Guidelines § 15126.6[f]).

The following alternatives have been evaluated in comparison to the General Plan and Targeted Zoning Code Update (Project):

- Alternative 1: No Project/Existing General Plan
- Alternative 2: Reduced Mixed-Use Alternative
- Alternative 3: Reduced Residential Alternative

In accordance with CEQA Guidelines Section 15126.6(d), the discussion of impacts associated with the alternatives is less detailed than the evaluation included in DEIR Chapters 4.1 through 4.20 of the impacts associated with implementation of the Project. The ability of each alternative to meet the basic project objectives was also described, and the "environmentally superior" alternative among the three (3) alternatives was identified, as required by the CEQA Guidelines. Table 2 (Alternatives Impacts Compared to Project Impacts) shows how impacts associated with the implementation of the alternatives compare to the impacts associated with implementation of the Project; the reader is advised to refer to the accompanying text for a fuller explanation.

**Table 2
Alternatives Impacts Compared to Project Impacts**

Impact/Resource	Alternative 1: No Project Existing General Plan	Alternative 2: Reduced (-25%) Mixed-Use Alternative	Alternative 3: Reduced (-50%) Residential Alternative
Air Quality	Similar SU	Reduced SU	Similar SU
Biological Resources	Similar LTS	Similar LTS	Similar LTS
Cultural Resources	Similar LTS	Similar LTS	Similar LTS
Energy	Similar LTS	Reduced LTS	Similar LTS
Geology and Soils	Similar LTS	Similar LTS	Similar LTS
Greenhouse Gas Emissions	Similar SU	Reduced SU	Similar SU
Hazards and Hazardous Materials	Similar LTS	Similar LTS	Similar LTS
Hydrology and Water Quality	Similar LTS	Similar LTS	Similar LTS
Land Use	Similar LTS	Similar LTS	Similar LTS
Noise	Similar LTS	Reduced LTS	Reduced LTS
Population and Housing	Reduced LTS	Reduced LTS	Similar LTS

Public Services	Similar LTS	Reduced LTS	Similar LTS
Recreation	Reduced LTS	Reduced LTS	Similar LTS
Transportation (VMT)	Similar SU	Reduced SU	Similar SU
Tribal Cultural Resources	Similar LTS	Similar LTS	Similar LTS
Utilities and Service Systems	Similar LTS	Reduced LTS	Similar LTS

Source: MIG, 2021

LTS= Less Than Significant Impact

SU= **Significant and Unavoidable Impact**

Rationale for Alternatives Selections

In accordance with CEQA Guidelines Section 15126.6(a), an EIR does not need to evaluate every conceivable alternative. A feasible range of alternatives has been evaluated that will allow decision-makers to make a reasoned choice that meets most of the project objectives. The project objectives included in Chapter 3 (Project Description) of the DEIR are:

1. **Healthy and Safe Neighborhoods.** Promote healthy and safe neighborhoods with comprehensive approaches that consider best practices around land use, mobility, housing, environmental justice, community services, and design.
2. **Economic Strength and Local Businesses.** Strengthen the City’s industrial and office sectors while increasing and diversifying commercial businesses.
3. **Diversified Economy.** Support a diversified economy with a balance of small and large businesses across a broad range of industries that provide employment, commercial, and experiential opportunities.
4. **Downtown.** Strive for a downtown that showcases our rich history, celebrates local entrepreneurship, features our civic institutions, and encourages downtown living within a vibrant gathering place for the community.
5. **Active and Diverse Transportation.** Create an interconnected, active transportation system that recognizes and responds to the critical needs of businesses to move commerce while accommodating the equally important necessity for pedestrians, cyclists, transit users, and motorists to move around the City with convenience and ease.
6. **Environmental Justice and Community Safety.** Improve environmental conditions, noise conditions, and air and water quality for all residents and people working in the City by minimizing the impacts of industrial businesses, truck and commuter traffic, and contaminated lands.
7. **Clean and Sustainable Environment.** Insist upon remediation of contaminated land and take steps to prevent pollution from the different processes involved in industrial business operations. Improve local air quality and make rational use of natural resources to support environmental responsibility and the collective health of residents, employees, and visitors.
8. **Equitable and Inclusionary.** Engage residents and stakeholders in ensuring equitable and inclusive processes, policies, investments, and service systems. Our residents in disadvantaged communities have access to healthy foods, parks, mobility options activity, public programs, and safe homes.
9. **Adaptive and Resilient Community.** Protect people, infrastructure, and community assets from evolving climate threats and vulnerabilities, and from natural and human-caused hazards.
10. **Technology.** Embrace technology and innovative practices where digital technology and intelligent design can be harnessed to create smart, sustainable cities and adaptable infrastructure systems.

In addition, although not directly included in the formal General Plan Update objectives, one of the objectives of the GPTZCU is to accommodate, within the framework of the City's General Plan, the State-mandated Regional Housing Needs Allocation (RHNA) goal for the City, which is a total of 952 dwelling units. Therefore, for each alternative, the extent to which the RHNA would be achieved (referred to as the "RHNA Objective") was also analyzed. While selecting alternatives to be considered for analysis, the City focused on analyzing those alternatives which could potentially reduce the significant unavoidable effects related to the Project and which would also achieve project objectives.

Alternatives Considered

Alternative 1: No Project/Existing 2008 General Plan

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate and analyze the impacts of a No Project Alternative. The "purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project" (14 CCR 15126.6[e][1]). When defining the No Project Alternative, the analysis must be informed by "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services" (14 CCR 15126.6(e)(2)).

Description

The No Project/Existing General Plan Alternative (No Project Alternative) assumes that development would occur within the Planning Area, but only development anticipated under the 1994 General Plan. Development assumptions for this alternative are shown in Tables 1 and 2. For this alternative, it is assumed there would be a significant reduction in residential development and a significant increase in non-residential development when compared to the Project. Additionally, no new policies, goals, or development standards associated with the Project would be implemented; the standards, goals, and policies associated with the 1994 General Plan would be applicable. This alternative would not meet the City's current Regional Housing Needs Allocation (RHNA) allocation.

Potential Impacts

The potential impacts associated with the No Project Alternative are described below.

a. *Air Quality.* The Project would result in significant unavoidable air quality impacts. While this alternative would result in a reduction in the amount of residential development compared to the Project, there would still be some additional housing units plus a significant increase in non-residential development compared to the Project. This alternative would likely not be consistent with SCAG forecasts for the City as population and housing growth exceeds the 2020-2045 RTP/SCS population and employment projections for the City (See Chapter 4.11); as such, this alternative would likely not be consistent with the SCAQMD 2016 Air Quality Management Plan (2016 AQMP) and would also exceed SCAQMD regional pollutant thresholds and thereby obstruct implementation of the AQMP. While no specific air quality modeling was undertaken for the alternative, it is likely that air quality mitigation measures needed for the Project would also be required for this alternative. The significant air quality impacts associated with the Project would be similar under this alternative.

b. *Biological Resources.* The Planning Area is completely urbanized and almost entirely built out with few vacant properties located throughout the City. As with the Project, development under this alternative would occur within urban areas that currently have existing development. Similar to the Project, this alternative would have a less-than-significant impact on biological resources.

c. *Cultural Resources.* As with the Project, development under the No Project Alternative could uncover previously unknown cultural resources or destroy/change structures that could be considered historic. As with the Project, under the No Project Alternative, the City's development requirements would include a CEQA evaluation to analyze potential impacts to historic resources, which may include mitigation measures to reduce potential impacts of future development within the Planning Area. Additionally, existing goals, policies and implementation programs within the Conservation Element ensure that significant archaeological resources are preserved and protected. Similar to the Project, this alternative would have a less-than-significant impact on cultural resources with adherence to existing regulations.

d. *Energy.* As with the Project, development associated with the No Project Alternative would require the consumption of electricity, natural gas, and vehicle fuel resources to accommodate growth. While this alternative does have a reduced level of residential development when compared to the Project, it does include an increase in non-residential development, which would consume energy. Similar to the Project, under this alternative new development and land use turnover would be required to comply with statewide mandatory energy requirements outlined in Title 24, Part 6, of the California Code of Regulations (the CALGreen Code), which would decrease estimated natural gas consumption in new and/or retrofitted structures. This alternative would have similar less-than-significant energy impacts compared to the Project.

e. *Geology and Soils.* The same geology and soils policies and regulations would be applicable to the No Project Alternative as to the Project, as the revisions to the Safety Element do not include changes to goals or policies related to geologic or seismic hazards. In addition, both the alternative and the Project would be exposed to the same existing geologic conditions within the Planning Area. As with the Project, existing building requirements would be applicable under this alternative. Additionally, all future projects would be required to be designed and constructed in compliance with all applicable City and State codes and requirements. All General Plan policies related to geology and seismic issues would be applicable to this alternative, as is the case with the Project. The No Project Alternative would have a less-than-significant geology impact, and would be considered similar to the Project.

f. *Greenhouse Gas Emissions.* The Project would result in significant unavoidable greenhouse gas (GHG) emissions impacts. This alternative would result in a reduction in residential development but a significant increase in non-residential development compared to the Project. It is likely that mitigation measures identified for the Project would also be required for this alternative. While no specific GHG modeling was undertaken for the alternative, it is likely that the No Project Alternative would result in similar significant GHG impacts associated with the Project.

g. *Hazards and Hazardous Materials.* Hazardous materials would be present during construction and operation of development associated with the No Project Alternative. The amount and use of these hazardous materials present during construction would be limited, would be in compliance with existing government regulations, and would not be considered a significant hazard. As with the Project, any future development under this alternative would be subject to the City's standard environmental review, which would include identification of any contaminated sites not already identified and implementation of appropriate cleanup and disposal procedures. The No Project Alternative would have a less-than-significant hazards and hazardous materials impact, and would be considered similar to the Project.

h. *Hydrology and Water Quality.* Development associated with implementation of the No Project Alternative would be subject to all existing water quality regulations and programs. This alternative

assumes a population and housing increase that would be less than the Project; however, the mitigation measure regarding water supply (UTL-1) would still be required under this alternative. The No Project Alternative would have a less-than-significant hydrology and water quality impact, and would be considered similar to the Project.

i. Land Use and Planning. As with the Project, the No Project Alternative would not physically divide an established community. Development would be consistent with the adopted 1994 General Plan, and would not conflict with regulations adopted to avoid environmental effects. Similar to the Project, this alternative would have a less-than-significant land use and planning impact.

j. Noise. The Project would result in less than significant noise impacts. While the No Project Alternative would result in significantly less residential development than the Project, it would result in a significant increase in non-residential development. While no specific noise modeling was undertaken for this alternative, it would still likely result in a less than significant roadway noise impact similar to the Project.

k. Population and Housing. This alternative would result in less residential development and population growth compared to the Project. Given the reduction in population and housing, this alternative would result in a reduced less-than-significant impact related to population and housing compared to the Project.

l. Public Services. This alternative would result in a reduced amount of residential development and population growth, which would result in decrease in demand for schools services and park facilities when compared to the Project. While the No Project Alternative would result in reduced residential growth, there would be a significant increase in non-residential uses, which could potentially increase the demand for fire and police services compared to the Project. Overall, the No Project Alternative would likely result in similar less-than-significant public services impacts compared to the Project.

m. Recreation. This alternative would result in a reduced amount of residential development and population growth, which would result in reduced demand for recreational facilities compared to the Project. This alternative would result in a reduced less-than-significant recreation impact compared to the Project.

n. Transportation. This alternative would result in less residential development than would occur with implementation of the Project. With the reduction in residential development associated with this alternative, it is possible that vehicle miles traveled impacts associated within new residences under this alternative would also be reduced. However, this alternative does include a significant increase in the amount of non-residential development. While no transportation modeling was undertaken for this alternative, a significant and unavoidable transportation impact would likely occur. The transportation impacts associated with this alternative would likely require similar mitigation measures as the Project and would still be considered significant and unavoidable.

o. Tribal Cultural Resources. As with the Project, development under the No Project Alternative could uncover previously unknown Tribal Cultural Resources. Compliance with existing regulations regarding burial grounds and consultation with Native American tribes would ensure that potential impact would be reduced. Similar to the Project, this alternative would have a less-than-significant impact on Tribal Cultural Resources with adherence to existing regulations.

p. Utilities and Service Systems. This alternative would result in a reduced amount of residential development growth, but an increase in non-residential development within the Planning Area. While this alternative assumes a population and housing increase that would be less than the Project, the mitigation measure regarding water supply (UTL-1) would still be required under this alternative. This alternative would have a similar less-than-significant utilities and service system impact when compared to the Project.

Attainment of Objectives

The No Project Alternative assumes that development would occur within the Planning Area, but only development anticipated under the existing General Plan. The No Project Alternative would meet some of the Project objectives but not nearly to the degree as the proposed GPTZCU. However, this alternative would **not** meet the RHNA allocation of accommodating 952 dwelling units.

Finding

The City rejects the No Project Alternative because it would not meet the City's Regional Housing Needs Allocation (RHNA) objective and would not meet the objectives of the project to nearly the same degree as the GPTZCU since it would only implement the existing General Plan policies.

Alternative 2: Reduced Mixed-Use Alternative

The Reduced Mixed-Use Alternative reflects a reduced number of residential units and a reduced amount of non-residential development (both approximately 25 percent less) compared to those expected under the proposed GPTZCU. Development assumptions for this alternative are shown in Table 1. This alternative assumes that policies, goals, or development standards associated with the Project would apply to this alternative. This alternative would meet the City's current Regional Housing Needs Allocation (RHNA) goals.

Potential Impacts

The potential impacts associated with the Reduced Mixed-Use Alternative are described below.

a. Air Quality. The Project would result in significant unavoidable air quality impacts. While this alternative would result in a reduction in the amount of residential development compared to the Project, it would likely not be consistent with SCAG forecasts for Santa Fe Springs as it exceeds the 2020 RTP/SCS population projections for the City; as such, this alternative would likely not be consistent with the SCAQMD 2016 Air Quality Management Plan (2016 AQMP) and would also exceed SCAQMD regional pollutant thresholds and thereby obstruct implementation of the AQMP. While no specific air quality modeling was undertaken for the alternative, it is likely that emissions would be reduced under this alternative but that the air quality mitigation measures needed for the Project would also be required for this alternative. It is likely that air quality emission would be reduced under this alternative, but that the alternative would result in reduced significant air quality impacts compared to the Project.

b. Biological Resources. The Planning area is completely urbanized and almost entirely built out with few vacant properties located throughout the City. As with the Project, development under this alternative would occur within urban areas that currently have existing development. Similar to the Project, this alternative would have a less-than-significant impact on biological resources.

c. Cultural Resources. Development under the Reduced Mixed-Use Alternative could uncover previously unknown cultural resources or destroy/change structures that could be considered historic. As with the Project, under the Reduced Mixed Use Alternative the City's development requirements would include a CEQA evaluation to evaluate potential impacts to historic

resources, which may include mitigation measures to reduce potential impacts of future development within the Planning Area. Additionally, existing goals, policies and implementation programs within the Conservation Element ensure that significant archaeological resources are preserved and protected. Similar to the Project, this alternative would have a less-than-significant impact on cultural resources with adherence to existing regulations.

d. Energy. As with the Project, development associated with the Reduced Mixed-Use Alternative would require the consumption of electricity, natural gas, and vehicle fuel resources to accommodate growth. However, given the reduced amount of development associated with this alternative, this alternative would result in reduced energy consumption compared to the Project. Similar to the Project, under this alternative new development and land use turnover would be required to comply with statewide mandatory energy requirements outlined in Title 24, Part 6, of the California Code of Regulations (the CALGreen Code), which would decrease estimated natural gas consumption in new and/or retrofitted structures. This alternative would have a reduced less-than-significant energy impact compared to the Project.

e. Geology and Soils. Both this alternative and the Project would be exposed to the same existing geologic conditions within the Planning area, and the same geology and soils policies and regulations would be applicable to both the Project and the alternative. As with the Project, existing building requirements would be applicable under this alternative and all future projects would be required to be designed and constructed in compliance with all applicable City and State codes and requirements. All General Plan policies related to geology and seismic issues would be applicable to this alternative, as is the case with the Project. The Reduced Mixed-Use Alternative would have a less-than-significant geology impact, and would be considered similar to the Project.

f. Greenhouse Gas Emissions. The Project would result in significant unavoidable greenhouse gas (GHG) emissions impacts. This alternative would result in a reduction in residential development and associated reduction in GHG emissions, but it is likely that mitigation measures identified for the Project would also be required for this alternative. While no specific GHG modeling was undertaken for the alternative, it is likely that the Reduced Mixed-Use Alternative would result in reduced significant GHG impacts compared to the Project.

g. Hazards and Hazardous Materials. Hazardous materials would be present during construction and operation of development associated with the Reduced Mixed-Use Alternative. The amount and use of these hazardous materials present during construction would be limited, would be in compliance with existing government regulations, and would not be considered a significant hazard. As with the Project, any future development under the Reduced Mixed Use Alternative would be subject to the City's standard environmental review process, which would include identification of any contaminated sites not already identified and implementation of appropriate cleanup and disposal procedures. The Reduced Mixed-Use Alternative would have a less-than-significant hazards and hazardous materials impact, and would be considered similar to the Project.

h. Hydrology and Water Quality. Development associated with implementation of the Reduced Mixed-Use Alternative would be subject to all existing water quality regulations and programs. This alternative assumes a population and housing increase that would be less than the Project; however, the mitigation measure regarding water supply (UTL-1) would still be required under this alternative. The Reduced Mixed-Use Alternative would have a less-than-significant hydrology and water quality impact, and would be considered similar to the Project.

i. Land Use and Planning. As with the Project, the Reduced Mixed-Use Alternative would not physically divide an established community and would not conflict with regulations adopted to avoid environmental effects. Similar to the Project, this alternative would have a less-than-significant land use and planning impact.

j. Noise. The Project would result in less than significant noise impacts. The Reduced Mixed-Use Alternative would result in an approximately 25 percent reduction in units that are expected to be located along major corridors, where mixed-use development would be anticipated. Under this alternative, measures would still be required to ensure that construction noise is mitigated for projects located near sensitive receptors. While no specific noise modeling was undertaken for the alternative, it is possible that the reduced vehicle trips associated with this alternative would have a reduced roadway noise impact compared to the Project.

k. Population and Housing. This alternative would result in less residential development and population growth compared to the Project. Given the reduction in population and housing, this alternative would result in a reduced less-than-significant population and housing impact compared to the Project.

l. Public Services. This alternative would result in a reduced amount of residential development and population growth, which would result in decrease in demand for public services. The Reduced Mixed-Use Alternative would result in a reduced less-than-significant public services impact compared to the Project.

m. Recreation. This alternative would result in a reduced amount of residential development and population growth, which would result in less demand for recreational facilities compared to the Project. This alternative would result in a reduced less-than-significant recreation impact compared to the Project.

n. Transportation. This alternative would result in less residential development than would occur with implementation of the Project. Given the reduction in development associated with this alternative, it is possible that vehicle miles traveled impacts under this alternative would also be reduced. As with the Project, the uncertainty related to future fuel prices and future legislative policy could dramatically influence VMT production in the City. While no transportation modeling was undertaken for this alternative, a reduced significant and unavoidable transportation impact would likely occur under this alternative. The transportation impacts associated with this alternative would likely require similar mitigation measures as the Project and would still be considered significant and unavoidable, although the impact would be reduced when compared to the Project due to the lesser amount of development.

o. Tribal Cultural Resources. As with the Project, development under the Reduced Mixed-Use Alternative could uncover previously unknown Tribal Cultural Resources. Compliance with existing regulations regarding burial grounds and consultation with Native American tribes would ensure that potential impact would be reduced. Similar to the Project, this alternative would have a less-than-significant impact on Tribal Cultural Resources with adherence to existing regulations.

p. Utilities and Service Systems. This alternative would result in a reduced amount of residential development within the Planning Area. While this alternative assumes a population and housing increase that would be less than the Project, the mitigation measure regarding water supply (UTIL-1) would still be required under this alternative. Given the reduced amount of development associated with the Reduced Mixed-Use Alternative, it would result in a reduced less-than-significant utilities and service system impact when compared to the Project.

Attainment of Objectives

The Reduced Mixed-Use Alternative would meet most of the project objectives but not to the same degree as the proposed GPTZCU; however, it would meet the RHNA Objective of accommodating 952 additional dwelling units.

Finding

The City rejects the Alternative 2: Reduced Mixed-Use Alternative because it would meet most of the project objectives but not to the same degree as the proposed GPTZCU.

Alternative 3: Reduced Residential Alternative

The Reduced Residential Alternative assumes that the total number of dwelling units under this alternative would be 50 percent less than the increase expected under the proposed GPTZCU. This alternative assumes the same amount of non-residential development as the proposed GPTZCU. This alternative assumes that policies, goals, or development standards associated with the Project would apply to this alternative. This alternative would also meet the current City's Regional Housing Needs Allocation (RHNA) goals.

Potential Impacts

The potential impacts associated with the Reduced Residential Alternative are described below.

a. Air Quality. The Project would result in significant unavoidable air quality impacts. Even though this alternative has half of the overall amount of residential development compared to the Project, it would likely not be consistent with SCAG forecasts in the 2020 RTP/SCS population projections for the City; as such, this alternative would likely not be consistent with the SCAQMD 2016 Air Quality Management Plan (2016 AQMP) and would also exceed SCAQMD regional pollutant thresholds and thereby obstruct implementation of the AQMP. While no specific air quality modeling was undertaken for the alternative, it is likely that air quality mitigation measures needed for the Project would also be required for this alternative. It is likely that the significant air quality impacts associated with the Project would be similar under this alternative.

b. Biological Resources. The Planning area is completely urbanized and almost entirely built out with few vacant properties located throughout the City. As with the Project, development under this alternative would occur within urban areas that currently have existing development. Similar to the Project, this alternative would have a less-than-significant impact on biological resources.

c. Cultural Resources. As with the Project, development under this alternative could uncover previously unknown cultural resources or destroy/change structures that could be considered historic. As with the Project, under the alternative, the City's development requirements would include a CEQA evaluation to evaluate potential impacts to historic resources, which may include mitigation measures to reduce potential impacts of future development within the Planning Area. Additionally, existing goals, policies and implementation programs within the Conservation Element ensure that significant archaeological resources are preserved and protected. Similar to the Project, this alternative would have a less-than-significant impact on cultural resources with adherence to existing regulations.

d. Energy. As with the Project, development associated with the Reduced Residential Alternative would require the consumption of electricity, natural gas, and vehicle fuel resources to accommodate growth. Similar to the Project, under this alternative new development and land use turnover would be required to comply with statewide mandatory energy requirements outlined in Title 24, Part 6, of the California Code of Regulations (the CALGreen Code), which would

decrease estimated natural gas consumption in new and/or retrofitted structures. This alternative would have similar less-than-significant energy impacts as the Project.

e. Geology and Soils. Both the alternative and the Project would be exposed to the same existing geologic conditions within the Planning Area, and the same geology and soils policies and regulations would be applicable to both the Project and the alternative. As with the Project, existing building requirements would be applicable under this alternative and all future projects would be required to be designed and constructed in compliance with all applicable City and State codes and requirements. All General Plan policies related to geology and seismic issues would be applicable to this alternative, as is the case with the Project. The Reduced Residential Alternative would have a less-than-significant geology impact, and impacts would be similar to the Project.

f. Greenhouse Gas Emissions. The Project would result in significant unavoidable greenhouse gas (GHG) emissions impacts. This alternative would result in roughly half as much new housing development as the Project. It is likely that mitigation measures identified for the Project would also be required for this alternative. While no specific GHG modeling was undertaken for the alternative, it is likely that the Reduced Residential Alternative would result in reduced but still significant GHG impacts compared to the Project.

g. Hazards and Hazardous Materials. Hazardous materials would be present during construction and operation of development associated with the Reduced Residential Alternative. The amount and use of these materials present during construction would be limited, would be in compliance with existing government regulations, and would not be considered a significant hazard. As with the Project, any future development under this alternative would be subject to the City's standard environmental review process, which would include identification of any contaminated sites not already identified and implementation of appropriate cleanup and disposal procedures. The Reduced Residential Alternative would have a less-than-significant hazards and hazardous materials impact, and would have impacts similar to the Project.

h. Hydrology and Water Quality. Development associated with implementation of the Reduced Residential Alternative would be subject to all existing water quality regulations and programs. The mitigation measure regarding water supply would still be required under this alternative. The Reduced Residential Alternative would have a less-than-significant hydrology and water quality impact, and would be considered similar to the Project.

i. Land Use and Planning. As with the Project, the Reduced Residential Alternative would not physically divide an established community and would not conflict with regulations adopted to avoid environmental effects. Similar to the Project, this alternative would have a less-than-significant land use and planning impact.

j. Noise. The Reduced Residential Alternative would result in half as much new housing within the City. Under this alternative, measures would still be required to ensure that construction noise is mitigated for projects located near sensitive receptors. While no specific roadway noise modeling was undertaken for the alternative, this alternative may have slightly less impacts although, similar to the project, noise impacts would be less than significant.

k. Population and Housing. This alternative would result in about half the number of residential units and new population growth compared to the Project. This alternative would reduce but still result in a similar less-than-significant impacts related to population and housing compared to the Project.

l. Public Services. This alternative would result in about half as many new housing units and similar reduction in population growth as the Project. This alternative would result in a similar less-than-significant public services impact compared to the Project.

m. Recreation. This alternative would result in substantially less housing development as the Project. This alternative would result in a similar but reduced less-than-significant recreation impact compared to the Project, due to the smaller number of homes that would be constructed.

n. Transportation. This alternative would result in half the number of new housing compared to implementation of the Project. Although there would be less residential development, there would be more office, commercial and industrial uses. As with the Project, the uncertainty related to future fuel prices and future legislative policy could dramatically influence VMT production in the City. While no transportation modeling was undertaken for this alternative, a significant and unavoidable transportation impact would likely occur under this alternative. The transportation impacts associated with this alternative would likely require similar mitigation measures as the Project and would still be considered significant and unavoidable.

o. Tribal Cultural Resources. As with the Project, development under the Reduced Residential Alternative could uncover previously unknown Tribal Cultural Resources. Compliance with existing regulations regarding burial grounds and consultation with Native American tribes would ensure that potential impact would be reduced. Similar to the Project, this alternative would have a less-than-significant impact on Tribal Cultural Resources with adherence to existing regulations.

p. Utilities and Service Systems. This alternative would result in half the amount of new housing development within the Planning Area as the Project, although there would be a similar amount of non-residential development. The mitigation measure regarding water supply would still be required under this alternative. This alternative would have a similar less-than-significant utilities and service system impact when compared to the Project.

Attainment of Objectives

The Reduced Residential Alternative would meet most of the project objectives but not to the same degree as the proposed GPTZCU; however, it would still meet the RHNA Objective of accommodating development of the City's 952 dwelling unit RHNA allocation.

Finding

The City rejects the Alternative 3: Reduced Residential Alternative because although this alternative would meet most of the project objectives but not to the same degree as the proposed GPTZCU.

Environmentally Superior Alternative

None of the alternatives would eliminate or reduce any of the significant impacts of the GPTZCU to less than significant levels. However, Alternative 2, the Reduced Mixed Use Alternative would reduce potential impacts to the greatest degree and would therefore be the "environmentally superior alternative." This conclusion is based on the comparative impact conclusions in Table 2 and the analysis within Chapter 5.0 (Alternatives) of the DEIR. In addition, this alternative would meet the City's Regional Housing Needs Allocation goals.

6 STATEMENT OF OVERRIDING CONSIDERATIONS

Pursuant to PRC Section 21081(b) and CEQA Guidelines Section 15093(a) and (b), the decision-making agency is required to balance, as applicable, the economic, legal, social, technological, or other benefits of a project against its unavoidable environmental risks when determining whether to approve a project. If the specific economic, legal, social, technological, or other benefits of a project outweigh the unavoidable adverse environmental effects, those effects may be considered “acceptable” (14 CCR 15093[a]). CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are not avoided or substantially lessened. Those reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record (14 CCR 15093[b]).

In accordance with the requirements of CEQA and the CEQA Guidelines, the City of Santa Fe Springs finds that the mitigation measures identified in the Final EIR and the MMRP, when implemented, will avoid or substantially lessen many of the significant effects identified in the EIR for the GPTZCU. However, certain significant impacts of the proposed GPTZCU are unavoidable even after incorporation of all feasible mitigation measures. These significant unavoidable impacts result from air quality impacts, greenhouse gas emissions, and transportation (including cumulative impacts).

The City finds that all feasible mitigation measures identified in the Final EIR that are within the purview of the City would be implemented with the proposed GPTZCU, and that those mitigation measures that may be within another agency’s discretion have been, or can and should be, adopted by that other agency. As identified below, the City further finds that the remaining significant unavoidable effects are outweighed and are found to be acceptable due to the following specific overriding economic, legal, social, technological, or other benefits based on the facts set forth above, the Final EIR, and the record.

The City finds that any one of the benefits set forth below is sufficient by itself to warrant approval of the proposed GPTZCU. This determination is based on the Findings herein and the evidence in the record. Having balanced the unavoidable adverse environmental impacts against each of the benefits, the City hereby adopts this Statement of Overriding Considerations for the following reasons:

- 1) The GPTZCU will provide long-term growth and enhancement of the community through fulfillment of the objectives stated below.
 - a) Promote healthy and safe neighborhoods with comprehensive approaches that consider best practices around land use, mobility, housing, environmental justice, community services, and design.
 - b) Strengthen the City’s industrial and office sectors while increasing and diversifying commercial businesses.
 - c) Support a diversified economy with a balance of small and large businesses across a broad range of industries that provide employment, commercial, and experiential opportunities.
 - d) Strive for a downtown that showcases our rich history, celebrates local entrepreneurship, features our civic institutions, and encourages downtown living within a vibrant gathering
 - e) Create an interconnected, active transportation system that recognizes and responds to the critical needs of businesses to move commerce while accommodating the

- equally important necessity for pedestrians, cyclists, transit users, and motorists to move around the City with convenience and ease.
- f) Improve environmental conditions, noise conditions, and air and water quality for all residents and people working in the City by minimizing the impacts of industrial businesses, truck and commuter traffic, and contaminated lands.
 - g) Insist upon remediation of contaminated land and take steps to prevent pollution from the different processes involved in industrial business operations. Improve local air quality and make rational use of natural resources to support environmental responsibility and the collective health of residents, employees, and visitors.
 - h) Engage residents and stakeholders in ensuring equitable and inclusive processes, policies, investments, and service systems. Our residents in disadvantaged communities have access to healthy foods, parks, mobility options activity, public programs, and safe homes.
 - i) Protect people, infrastructure, and community assets from evolving climate threats and vulnerabilities, and from natural and human-caused hazards.
 - j) Embrace technology and innovative practices where digital technology and intelligent design can be harnessed to create smart, sustainable cities and adaptable infrastructure systems.
- 2) The GPTZCU contains goals, policies, and programs that will provide City staff and discretionary bodies with a foundation for decisions for long-range planning related to physical development and public services that are intended to achieve the planning goals set forth in the Housing, Land Use, Circulation, Safety, Open Space and Conservation, Noise, Economic Development, and Environmental Justice elements of the City's General Plan and that will comply with applicable State law.

On balance, the City finds that there are specific economic, legal, social, technological, and other considerations associated with the proposed GPTZCU that serve to override and outweigh the significant unavoidable effects of the proposed GPTZCU, and, thus, the adverse effects are considered acceptable. Therefore, the City hereby adopts this Statement of Overriding Considerations.