



INITIAL STUDY FOR NEGATIVE DECLARATION OF ENVIRONMENTAL IMPACT PLN-13-00228

PROJECT NAME: AT&T Monopole @ Discovery Sports Complex

PROJECT LOCATION: 12400 Columbia Way, Downey CA 90242
(AIN 6256-004-910)

PROJECT APPLICANT: Terri Grisenti w/ Coastal Business Group
for AT&T Mobility
16150 Scientific Way
Irvine, CA 92618

LEAD AGENCY: City of Downey
Community Development Department
Planning Division
11111 Brookshire Avenue
Downey, CA 90241

Contact: David Blumenthal, Senior Planner
(562) 904-7154
dblumenthal@downeyca.org

PUBLIC REVIEW PERIOD: February 20, 2014 to March 13, 2014

This Negative Declaration and Initial Study Checklist have been prepared pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code, Section 21000, et seq.) and the State CEQA Guidelines (California Code of Regulations, Section 15000, et seq.).

Written comments regarding this Negative Declaration shall be made to the Lead Agency listed above prior to 5:00 p.m. on the last day of the Public Review Period.

SECTION I. INTRODUCTION**1. Description of project:**

The proposed project is a request by AT&T Mobility to construct and operate an unmanned wireless monopole within the Discovery Sports Complex. AT&T replace an existing 81' tall light pole, which is used to illuminate one of the soccer fields and one of the softball fields, with a new 81' tall light pole that has six tall panel antennas (three sectors, two antennas per sector) flush mounted to the pole. The panel antennas are eight feet tall, in which three of the antennas (one per sector) will have a centerline height of 61'-6" and the other three antennas (one per sector) will have a centerline height of 52'-6". In addition to the panel antennas, there will be 15 remote radio units and three surge suppressors flushed mounted to the pole below the antennas. The new light pole/cellular tower will be installed approximately ten feet east of the existing light pole.

Approximately 65' to the east of the light pole/cellular tower, AT&T will construct a new 480 square foot building, in which 240 square feet will be used by AT&T for equipment related to the cellular antennas and the remaining 240 square feet will be a storage room used by the City of Downey Parks and Recreation Department.

Since this project is within a City park, AT&T Mobility is also requesting a lease from the City of Downey. The proposed lease terms are as follows:

- \$3,000 per month (\$36,000 per year) for a ten-year initial term,
- Rental payment increases 3% per year in years 2-10,
- Mandatory fair market value analysis after the 1st term (at AT&T's expense),
- Renewable for two additional five-year terms unless 60-days' notice provided,
- Construction of storage room.

2. Description of project site (as it currently exists):

The subject site is a 12.8 acre rectangular shaped parcel that is located on the east side of Columbia Way between Imperial Hwy and Lakewood Blvd. The site has a General Plan Land Use Designation of Mixed Use and is zoned Downey Landing Specific Plan (SP 01-1). The site is improved with the Columbia Memorial Space Center (CMSC) and the Discovery Sports Complex. Specifically, the existing site improvements include:

- The Columbia Memorial Space Center – an 18,520 square foot two-story museum and learning center, which is located on the northwest corner of the site.
- Apollo Boiler Plate 12 – an unmanned, transonic abort test vehicle that was used for the first full-scale test flight of the Apollo launch escape. Boiler Plate 12 is located adjacent to the Columbia Memorial Space Center.
- Two softball fields with a public restroom building between them. The softball fields are located on the northeast corner of the site.
- Two soccer fields on the southeast corner of the site.
- A 100 space parking lot located on along the entire width of the north side of the site. Additionally, there are 35 parking spaces on the west side of the site, located within the Columbia Way right-of-way.
- General park area/future expansion area for the CMSC, which is located on the south side of the museum.

- Several light standards throughout the site. This includes lights poles that range from 69 to 81 feet tall to illuminate the softball and soccer fields, as well as shorter lights used to illuminate walkways and parking areas.

In addition to the above-ground improvements there is a 4.8 acre-foot storm water detention basin below the soccer field used to recharge ground water and a 3.2 acre-foot retention basin located near the museum used for temporary capacity increases to the City's storm water system.

3. Description of surrounding properties:

The property to the north of the subject site is an approximate 80 acre parcel that is the future home of The Promenade at Downey (currently under construction). The new mixed use development will include approximately 1.5 million square leasable feet to accommodate a variety of retailers, restaurants, a cinema, and office space. The property is within the Amended Downey Landing Specific Plan and has a General Plan Land Use Designation of Mixed Use.

The property to the east of the subject site (across Congressman Steve Horn Way) is also within the Downey Landing Specific Plan and has a General Plan Land Use Designation of Mixed Use. The property is improved with the Kaiser Downey Medical Center, which includes a 352 bed hospital, various medical office buildings, and a combination of surface parking with a parking structure.

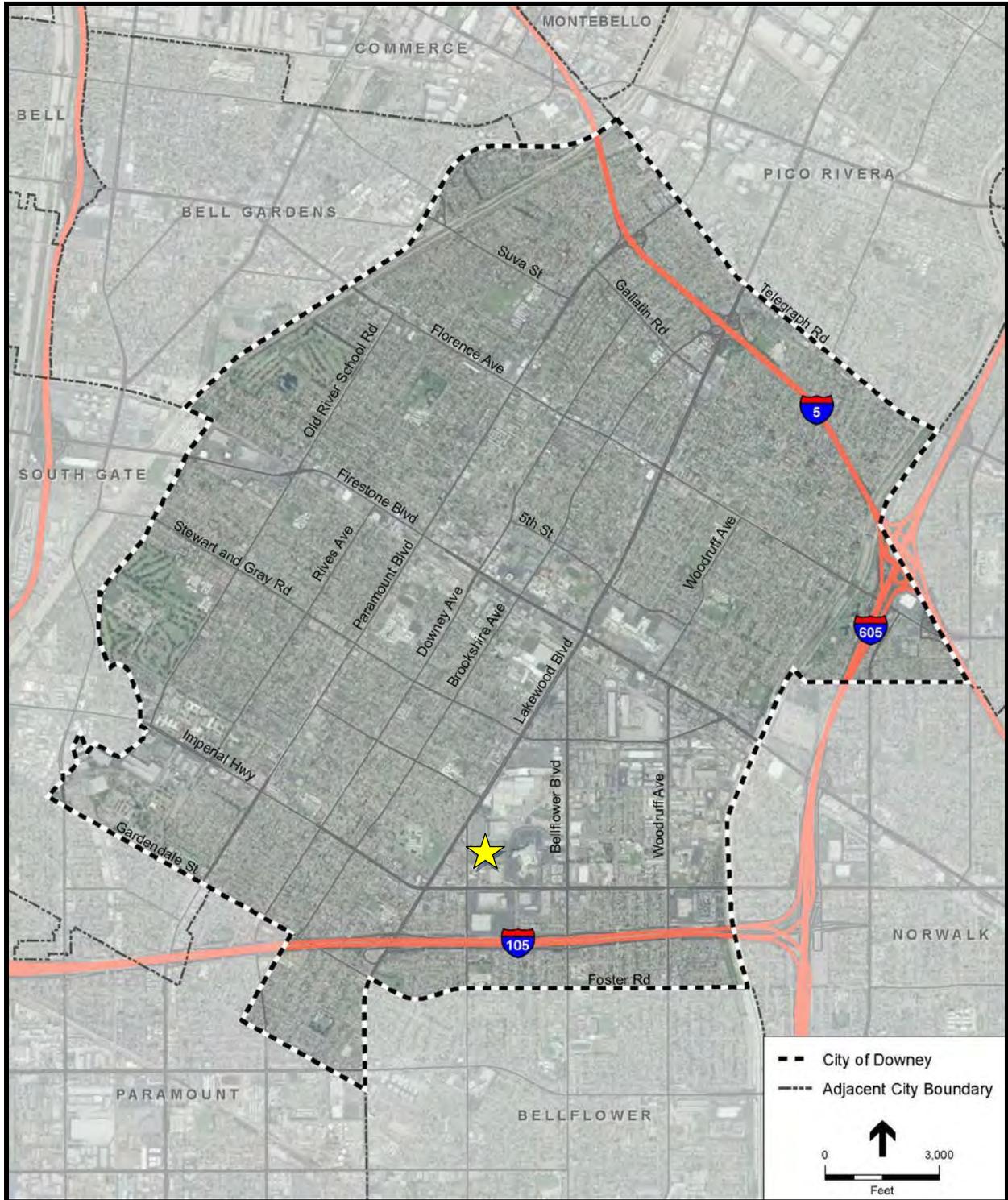
To the west of the subject site (across Columbia Way) are various properties improved with multiple family residences. These properties are within the General Commercial General Plan Land Use Designation and are zoned R-3 (Multiple Family Residential).

To the south of the subject site are multiple properties that have a General Plan Land Use Designation of Mixed Use and are zoned C-M (Commercial Manufacturing). These parcels are improved with various manufacturing businesses.

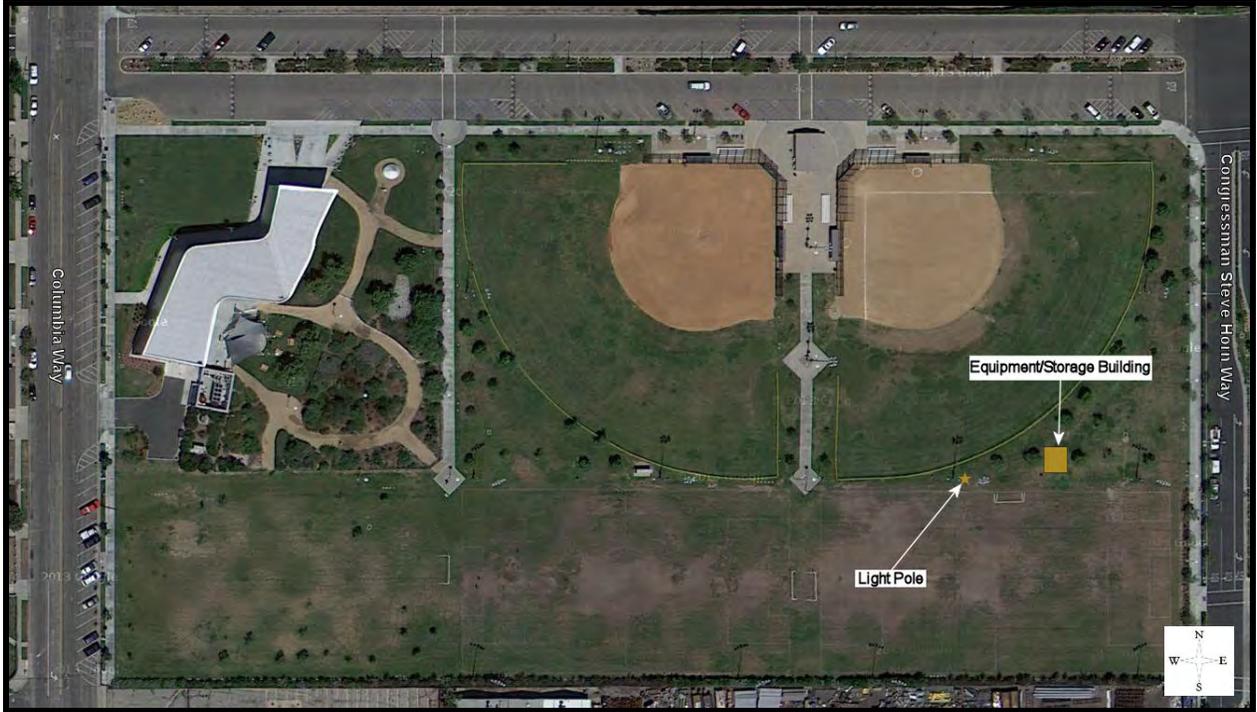
4. City Characteristics:

The City of Downey is 12.8 square mile community that is located in the southeastern part of Los Angeles County. The State of California Department of Finance estimated that City's population is 112,761, as of January 1, 2013. The City of Downey is located about 12 miles southeast of downtown Los Angeles and is bounded by: the Rio Hondo River on the west; Telegraph Road on the north; the San Gabriel River on the east; and Gardendale Street and Foster Road on the south. Cities bordering Downey include: Pico Rivera on the north and Santa Fe Springs on the northeast, Norwalk on the east, Bellflower and Paramount on the south, South Gate on the southwest and west and Commerce on the northwest.

Regional access to and from the City of Downey is provided by the Santa Ana (I-5) Freeway; Glen Anderson Freeway (I-105) Freeway; the San Gabriel River Freeway (I-605) Freeways; and the Long Beach Freeway (I-710); MTA Green Line Light Rail passenger train services at the Lakewood Boulevard station, and various Metro Bus Lines that connect throughout the City.



Project Location



Aerial of Site



Aerial of Project Area

**SECTION II. ENVIRONMENTAL FACTORS
POTENTIALLY AFFECTED**

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist in section III.

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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a significant effect(s) on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets, if the effect is a “potentially significant impact” or “potentially significant unless mitigated”. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project.

Signature: Original signed by David Blumenthal
David Blumenthal, Senior Planner
for the City of Downey

Date: February 20, 2014

SECTION III. INITIAL STUDY CHECKLIST AND ENVIRONMENTAL EVALUATION

This section analyzes the potential environmental impacts which may result from the proposed project. For the evaluation of potential impacts, the questions in the Initial Study Checklist are stated and answers are provided according to the analysis undertaken as part of the Initial Study. They outline the following issues:

- | | |
|------------------------------------|--|
| 1. Aesthetics | 10. Mineral Resources |
| 2. Agriculture Resources | 11. Noise |
| 3. Air Quality | 12. Population and Housing |
| 4. Biological Resources | 13. Public Services |
| 5. Cultural Resources | 14. Recreation |
| 6. Geology and Soils | 15. Transportation and Traffic |
| 7. Hazards and Hazardous Materials | 16. Utilities and Service Systems |
| 8. Hydrology and Water Quality | 17. Mandatory Findings of Significance |
| 9. Land Use and Planning | |

The analysis considers the project’s short-term impacts (construction-related), and its operational or day-to-day impacts. For each question, there are four possible responses. They include:

1. **No Impact.** Future development arising from the project’s implementation will not have any measurable environmental impact on the environment and no additional analysis is required.
2. **Less Than Significant Impact.** The development associated with project implementation will have the potential to impact the environment; these impacts, however, will be less than the levels or thresholds that are considered significant and no additional analysis is required.
3. **Potentially Significant Impact Unless Mitigated.** The development will have the potential to generate impacts which will have a significant effect on the environment; however, mitigation measures will be effective in reducing the impacts to levels that are less than significant.
4. **Potentially Significant Impact.** Future implementation will have impacts that are considered significant, and additional analysis is required to identify mitigation measures that could reduce these impacts to less than significant levels.

	Potentially Significant Impact - EIR Analysis Is required	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact - EIR Analysis Is required	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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Response:

(a and b): No impact. The City of Downey is an urban environment with no scenic vistas or scenic highways.

(c and d): No impact. While the proposal involves installing a new 81’ tall light standard with cellular antennas flush mounted to the side of it, there will be little impact to visual character of the area. The antennas will be flush mounted and painted to match the pole, thus having little aesthetic impact to the area. The new equipment/storage room is designed to match the existing park restroom building, thus blending it in with the site improvements. No new light or glare will be created by this project since the lights will replace an existing 81’ tall light pole.

2. AGRICULTURE RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use or a Williamson act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Response:

(a, b and e): No impact. The City of Downey is an urbanized area that is mostly built out with only infill development potential. There are no agricultural lands within the City’s boundaries. The project will have no impact on converting Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. Furthermore, agricultural uses are not permitted within the specific plan and the City’s General Plan (Vision 2025) does not include provisions for agricultural uses in the future.

(c): No impact. The City of Downey is an urbanized area that is mostly built out with only infill development potential. There are no forest or timberland lands within the City’s boundaries. Therefore the project will not conflict with existing zoning for, or cause rezoning of, forest land,¹ timberland,² or timberland zoned Timberland

¹ As defined in Public Resource Code 12220(g)

² As defined in Public Resource Code 4526

	Potentially Significant Impact - EIR Analysis Is required	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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Production.³

(d): No impact. The City of Downey is an urbanized area that is mostly built out with only infill development potential. There are no forest lands within the City’s boundaries. Therefore the project will thus not result in the loss of forest land or conversion of forest land to non-forest use.

3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Response:

(a): No impact. Construction and improvements are not anticipated to conflict with or obstruct implementation of the applicable air quality plan. The proposed project site is located in the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is the regional agency responsible for air quality regulations within the SCAB including enforcing the California Ambient Air Quality Standards (CAAQS) and implementing strategies to improve air quality and to mitigate effects from new growth. The SCAQMD, in association with the California Air Resources Board (CARB) and the Southern California Association of Governments (SCAG), is responsible for preparing the Air Quality Management Plan (AQMP) that details how the region intends to attain or maintain the state and federal ambient air quality standards. The Final 2007 AQMP describes the SCAQMD’s plan to attain the federal fine particulate matter less than or equal to 2.5 microns (µm) in diameter (PM_{2.5}) and 8-hour ozone (O₃) standards. Although the SCAQMD cannot directly regulate mobile source emissions, the Final 2007 AQMP requires the use of cleaner (as compared to "baseline") in-use (i.e., existing) off-road (i.e., non-highway) equipment. In 2007, CARB adopted a regulation to reduce diesel particulate matter and nitrogen oxides (NO_x) emissions from in-use (existing) off-road heavy-duty diesel vehicles. Consistency with the 2007 AQMP is determined when a project: (1) does not increase the frequency or severity of an air quality standards violation or cause a new violation; (2) is consistent with the growth assumptions in the AQMP; and (3) does not conflict with the implementation of any of the control measures or strategies adopted in the AQMP. The purpose of the AQMP is to bring an area into compliance with the requirements of Federal and State air quality standards. The consistency review is as follows:

1. The project will result in short-term construction related pollutant emissions less than the CEQA significance emissions thresholds established by the SCAQMD, as determined in Response No. 3(b)

³ As defined in Government Code Section 51104(g)

Potentially Significant Impact - EIR Analysis Is required	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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below. Therefore, the project will not result in an increase in the frequency or severity of an air quality standards violation and will not cause a new air quality standard violation.

2. The project does not include a residential component that would result in any population growth and is consistent with the mixed use land use designation. Therefore, the project is consistent with the growth assumptions utilized in the AQMP.

3. The pollution control strategies of the 2007 AQMP are mainly concerned with technologically based means of reducing emissions from mobile and stationary sources. Many of the control strategies are plans to develop regulations and rules that will specify future requirements for activities to reduce pollutant emissions. Example control strategies include increased industrial PM emissions control through baghouses, wet scrubbers, and other devices, volatile organic compounds (VOC) reductions in lubricants, and the light- and medium-duty vehicle high-emitters identification program to reduce NO_x, and VOC emissions. There are no control strategies that are applicable to the project.

Based on this consistency analysis, no impact is anticipated relating to conflicts with the Air Quality Management Plan.

(b and c): Less than significant impact. Short-term air quality impacts may occur from construction activities, although should they occur the proposed project does not anticipate violating any air quality standard or contribute substantially to an existing or projected air quality violation. All construction equipment is required to comply with CARB regulations, and construction activity is subject to the SCAQMD regulations. The California Clean Air Act, signed into law in 1988, established the CAAQS; all areas of the state are required to achieve and maintain the CAAQS by the earliest practicable date. Regions of the state that have not met one or more of the CAAQS are known as nonattainment areas, while regions that meet the CAAQS are known as attainment areas. The proposed project is located in the Los Angeles County sub-area of the SCAB. Los Angeles County is designated as a state nonattainment area for O₃, PM_{2.5}, inhalable particulate matter less than or equal to 10 μm in diameter (PM₁₀), nitrogen dioxide (NO₂), and lead; and an attainment or unclassified area for carbon monoxide (CO), sulfur dioxide (SO₂), sulfates, hydrogen sulfide, and visibility reducing particles. The SCAQMD publishes thresholds of significance for these pollutants.⁴ Due to the small nature of the construction project, it is not anticipated that the equipment used will exceed the thresholds of significance. Furthermore, the General Plan EIR contains several mitigations measures that are meant to reduce any impacts to a level below significance.⁵

(d): Less than significant impact. Sensitive receptors include day care centers (adult & child), schools, hospitals, churches, rehabilitation centers, and long-term care facilities (i.e. assisted living facilities). While there are several sensitive receptors within the vicinity of the project (i.e. Kaiser Downey), long term impacts are not anticipated since operation of the cellular antennas do not generate emissions or require frequent vehicle trips. Notwithstanding this, as noted in Response No. 3(b and c) above, there could be short-term impacts during construction, but these impacts are either below the threshold of significance and/or have been previously mitigated.

(e): Less than significant impact. During construction there would be minimal emissions as described in Response No. 3(b and c) above; however because this is short term in nature it is considered to be less than significant.

⁴ South Coast Air Quality Management District, Air Quality Significance Thresholds, March 2011

⁵ City of Downey, Downey Vision 2025 – Comprehensive General Plan Update EIR Mitigation Monitoring Program, January 2005 p. 4-3 et. seq.

	Potentially Significant Impact - EIR Analysis Is required	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
4. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources? (i.e. tree preservation ordinance).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Response:

(a): No impact. According to the Environmental Impact Report prepared for the City of Downey General Plan⁶, and the Environmental Impact Report prepared for the Tierra Luna Project⁷ (now known as The Promenade) there are no species identified as a candidate, sensitive, or special species in local, regional, state, or federal documents within the City of Downey. Even though the project will take place within a City park, it is not anticipated to require the remove of any trees or shrubs, thus no impact is expected.

(b): No impact. This portion of the project site is used for sports fields (soccer and softball). There are no riparian habitats or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Moreover, the three river channels that are located within the boundaries of the City of Downey (Rio Hondo Channel, Los Angeles River, and San Gabriel River) are cement- or riprap-lined and support limited vegetation. These rivers are separated from the project site by miles of residential, industrial, and commercial developments.

⁶ City of Downey, Downey Vision 2025 – Comprehensive General Plan Update EIR Initial Study, March 2004 p. C-18

⁷ City of Downey, Tierra Luna EIR, April 2009 p. IV A-2

Potentially Significant Impact - EIR Analysis Is required	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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(c): No Impact. Based on a June 2008 review of the National Wetlands Inventory, the Tierra Luna EIR found that there were no protected wetlands in the immediate area of the Promenade project site.⁸ However, a review of the National Wetlands Inventory in February 2014 showed that there was a fresh water pond and a freshwater emergent wetland on the site.⁹ Prior to the City constructing the park and museum, the area was used as a parking lot for the former aerospace plant at the site. Since closure of the plant, the City graded the site to allow stormwater to sheet flow from the site. Given these facts, it is believed that the inventory is incorrectly showing the wetlands area on the map. Nevertheless, the proposed light pole/cellular site and storage/equipment building are located outside of the areas showing as protected wetlands. The construction and operation will not impact these areas.

(d): No Impact. The movement of any native resident or migratory fish or wildlife species or established native resident migratory wildlife corridors, or the uses of native wildlife nursery sites have not been identified in the City of Downey.¹⁰ Accordingly, the project would not impact the movement of any native resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors. No impact would occur.

(e): No Impact. The City of Downey does not have any local ordinance to protect biological resources. No impact would occur.

(f): No Impact. There is no adopted Habitat Conservation Plan, Natural Community Plan or other habitat conservation plan. No impact would occur.

5. CULTURAL RESOURCES. Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines 5064.85? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines 5064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Disturb any human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Response:

(a). No impact. The subject site is a park and museum that was opened in 2009. While there are several artifacts within the museum, none of them are in the project area. There are no other historical resources on the site.

(b): No impact. The project site is previously disturbed, and there are no known archeological resources on the site. The project will have no impact on the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. Notwithstanding this, should any be discovered on the site, the applicant is required to comply with the provisions set forth in CEQA Guidelines Section 15064.5 regarding archaeological sites.

⁸ City of Downey, Tierra Luna EIR, April 2009 p. IV A-2

⁹ Verified on U.S. Fish and Wildlife Services National Wetlands Inventory Map (<http://www.fws.gov/wetlands/Wetlands-Mapper.html>) on February 19, 2014

¹⁰ City of Downey, Downey Vision 2025 – Comprehensive General Plan Update Draft EIR Initial Study. March 2004. p. C-19.

Potentially Significant Impact - EIR Analysis Is required	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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(c): No impact. The project site is previously disturbed, and there are no known paleontological resources on the site. The proposed sign would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Notwithstanding this, should any be discovered on the site, the applicant is required to comply with the provisions set forth in CEQA Guidelines Section 15064.5 regarding paleontological sites.

(d): No impact. The project is not expected to disturb any human remains “since all burials in the City have occurred in the Downey Cemetery since the late 1880s”.¹¹ Thus, the project will not disturb any human remains, including those interred outside of formal cemeteries. Notwithstanding this, should any be discovered on the site, the applicant is required to comply with the provisions set forth in CEQA Guidelines Section 15064.5 regarding human remains sites).

6. GEOLOGY AND SOILS. Would the project:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| 1) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2) Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3) Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4) Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

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

d. Be located on expansive soil, as defined in Table 18-1-B of the California Building Code, creating substantial risks to life or property?

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

Response:

(a1 though a3 and c): Less than significant impact. The City of Downey is not located within an Alquist-Priolo Earthquake Fault Zone, as indicated on the zone map issued by the State Geologist for the area, nor is it expected to involve strong seismic ground shaking or seismic-related ground failure, including liquefaction. Construction on the site will not involve significant changes in topography. Nonetheless, the City of Downey is located in an area considered to be seismically active, as is most of Southern California. Major active fault zones are located southwest and northeast of the City, with the fault with the greatest potential to impact the

¹¹ City of Downey, Downey Vision 2025 – Comprehensive General Plan Update Draft EIR. July 2004 p. 8-2

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project site being the Whittier Fault, which is located approximately 4-5 miles northeast of the project site and is capable of a maximum moment magnitude of 6.8.¹² Since the site is not located within the boundaries of an Earthquake Fault Zone and no faults are known to pass through the property, surface fault rupture within the site is considered unlikely. Construction of the proposed project would comply with current California Building Code, as amended by the City of Downey, requirements that would ensure a less than significant impact from exposure of people or structures to risk associated with rupture of a known earthquake fault.

Liquefaction is a phenomenon where earthquake-induced ground vibrations increase the pore pressure in saturated, granular soils until it is equal to the confining, overburden pressure. When this occurs, the soil can completely lose its shear strength and enter a liquefied state. The possibility of liquefaction is dependent upon grain size, relative density, confining pressure, saturation of the soils, strength of the ground motion and duration of ground shaking. In order for liquefaction to occur, three criteria must be met: underlying loose, coarse-grained (sandy) soils; a groundwater depth of less than about 50 feet; and a nearby large magnitude earthquake. The susceptibility of soil to liquefy tends to decrease as the density of the soil increases and the intensity of ground shaking decreases. Strong ground shaking will also tend to densify loose to medium dense deposits of partially saturated granular soils and could result in seismic settlement of foundations and the ground surface at the project site. The overall potential for damaging seismically-induced settlement is considered to be low. Seismically-induced ground shaking can also cause slope-related hazards through various processes including slope failure, lateral spreading, flow liquefaction, and ground lurching. Based on the City of Downey’s Department of Public Works ground water data, historical ground water levels in the area are typically found between 75 and 100 feet. Due to the depth of ground water in the area and the distance of the nearest fault, the potential for liquefaction and/or lurching at the site is low. Nevertheless, all construction is required to comply with current California Building Code, as amended by the City of Downey to address any potential impact.

(a4): No impact. Topographically, the property is essentially planar, sloping gently at about a one to two percent grade for water runoff. Elevations in the area approximately 100 feet above sea level. Overall the City of Downey has a relatively flat topography, and the possibility of landslides is typically unlikely. The project site is not within a potential earthquake-induced landslide hazard zone, and due to the low gradient of the site, seismically induced landsliding is nil. Implementation of the proposed project would not result in the exposure of people or structures to the risk of landslides during a seismic event.

(b): No impact. The project will not result in substantial soil erosion or the loss of topsoil. The potential for soil erosion on the project site is low due to the existing planar topography of the project site. Furthermore, the disturbed area for construction is considered to be minimal and all trenched areas will be restored with grass.

(d): No impact. Expansive soils are typically composed of certain types of silts and clays that have the capacity to shrink or swell in response to changes in soil moisture content. Shrinking or swelling of foundation soils can lead to damage to foundations and engineered structures including tilting and cracking. The proposed project would comply with current City Code and CBC requirements and would not affect foundations or result in other structural or engineering modifications that could increase exposure of people or structures to risk associated with expansive soils.

(e): No impact. The City of Downey is an urban area that is served by a sanitary sewer system. New septic tanks are prohibited within the City. Nevertheless, the proposed project does not include new plumbing facilities, thus now sewer connection will be required.

¹² City of Downey, Downtown Downey Specific Plan EIR. July 2010 p. 3.10-4

	Potentially Significant Impact - EIR Analysis Is required	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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7. GREENHOUSE GAS EMISSION. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Response:

(a): Less than significant impact. Greenhouse gas (GHG) emissions contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature. It is the combination of GHG emissions from past, present, and future projects contributes substantially to the phenomenon of global climate change and its associated environmental impacts and as such is addressed only as a cumulative impact. Implementation of the proposed project would not substantially contribute to increases of GHG emissions that are associated with global climate change. Estimated GHG emissions attributable to the proposed project are minimal and would be primarily associated with increases of carbon dioxide (CO₂) from mobile sources associated with project construction.

Emissions of CO₂ typically constitute a majority of total mobile-source GHG emissions commonly associated with development projects. To a lesser extent, other GHG pollutants, such as methane (CH₄), largely generated by natural-gas combustion, and nitrous oxide (N₂O), would typically have a minor contribution to overall GHG emissions. The SCAQMD does not have an adopted threshold of significance for construction-related or for operational-related GHG emissions for nonindustrial facilities. However, as described in the Air Quality section above, the proposed project is well below the SCAQMD's screening thresholds for projects that would emit significant emissions, including CO₂. The proposed project could generate GHG emissions from vehicle exhaust (i.e., trucks, cherry picker/lift(s), and construction worker commuting) associated with the construction on the site. These impacts are short term and thus are considered to be less than significant.

(b): Less than significant impact. As discussed in Response No. 7(a) above, GHG emissions that would occur from the construction and operation of the proposed project would be less than significant. The City does not have local policies or ordinances with the purpose of reducing greenhouse gas emissions. However, the City is subject to compliance with the Global Warming Solutions Act (AB 32). Therefore, compliance with AB 32 would ensure a less than significant impact.

8. HAZARDS AND HAZARDOUS MATERIALS: Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

	Potentially Significant Impact - EIR Analysis Is required	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury or death involving wild land fires, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wild lands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Response:

(a through c): No impact. The proposed project is located at the Discovery Sports Complex, a City park. The proposal will be to construct and operate an unmanned cellular tower adjacent to the soccer field on the site. The site does not contain any maintenance or repair facilities, nor does it have any industrial uses. The park and cellular antennas are not associated with the handling, storage and/or release of potentially hazardous materials, thus no impact is anticipated.

Excavations are anticipated at the site for construction of the structures and underground cables. Nevertheless, there are no known contaminated soils or groundwater on the project site. As such, the project will not 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.

(d): No impact. The project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.¹³

(e and f): No impact. The City of Downey is not located within an airport land use plan or within two miles of a public airport or public use airport. Therefore, the project would not result in a safety hazard for people residing or working in the project area.

(g): No Impact. The site is not a defined staging/evacuation area. Nevertheless, the proposed project will occupy a small portion of the 12.8 acre park. It would not prevent the park from being used for staging and/or evacuations. In any case, adopted emergency response plan or emergency evacuation plans are in place and won't be impacted by the new cellular site and storage room. Therefore, no impact is expected regarding emergency plans.

¹³ Verified on Department of Toxic Substance Control website (<http://www.envirostor.dtsc.ca.gov/public>) on February 19, 2014.

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(h): No impact. The project site is located in an urbanized and industrial area of the City and is not contiguous to a designated high fire area associated with any designated wildland area. Therefore, implementation of the proposed project would not result in the exposure of people or structures to hazards associated with wildland fires.

9. HYDROLOGY AND WATER QUALITY. Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Violate any water quality standards or waste discharge requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. Otherwise substantially degrade water quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| j. Inundation by seiche, tsunami, or mudflow? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Response:

(a through f): No impact. The agency with jurisdiction over water quality within the project area is the Los Angeles Regional Water Quality Control Board (LARWQCB). The Clean Water Act (CWA) prohibits the

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discharge of pollutants to waters of the United States from any point source unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. In accordance with the CWA, the construction is required to comply with the NPDES, as such would not cause any violations associated with water quality standards or water discharge requirements.

In addition to the project specific water runoff, the subject site does contain a below ground 4.8 acre-foot storm water detention basin below the soccer field and a 3.2 acre-foot retention basin located near the museum. The proposed project, including all trenching will not interfere with these storm water systems.

(g through h): No impact. Pursuant to Flood Insurance Rate Map, Flood Zone Map No. 06037C1820F, as revised on September 26, 2008, the project site does not lie within the boundaries of 100 year flood zones. Furthermore, due to the nature of the proposed project, it would not impede or redirect flood flows within the area and does not include a housing component.

(i): No impact. The subject site is located between the Rio Hondo Channel/ Los Angeles river and the San Gabriel river. According to the Vision 2025 FEIR, these flood control channels has been designed to meet or exceed the discharge capacity for a 100-year flood.¹⁴ Due to the distance between the project site and the levees constructed for these rivers, there is no possibility for there to be an impact.

(j): No impact. The City of Downey is relatively flat and is not located near a dam, lake, or ocean, and therefore, inundation by seiche, tsunami, or mudflow is not anticipated. Moreover, tsunamis and seiches do not pose hazards due to the inland location of the site and lack of nearby bodies of standing water.

10. LAND USE AND PLANNING. Would the project:

- a. Physically divide an established community?
- b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
- c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

Response:

(a): No impact. The proposed project will be located in the middle of a public park. There is no housing on the site or other established communities. As such, there will be no impact

(b): No impact. The project will not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. The project is consistent with the current General Plan and the Specific Plan. Furthermore, the EIR for both of these plans contain mitigation measures, which are designed to protect the environment that the proposed project is still required to comply with.

(c): No impact. There is no applicable habitat conservation plan or natural community conservation plan. Therefore, the project will not conflict with any applicable habitat conservation plan or natural community conservation plan, as there are no applicable conservation plans

¹⁴ City of Downey, Downey Vision 2025 – Comprehensive General Plan Update Draft EIR. July 2004 p. 5-58

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11. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Response:

(a and b): No impact. The project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. There are no known mineral resources on the site. Therefore, the proposed project would not affect access to or the availability of valued mineral resources.

12. NOISE. Would the project result in:

a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Response:

(a, b and d): Less than significant impact. During the short period of construction of the project, there may be increased noise levels or vibration. Construction activities are regulated by the City of Downey’s Municipal Code. These impacts would be temporary and are considered less than significant. Construction and implementation of the proposed project would not result in a substantial temporary or permanent increase in ambient noise levels, nor would it expose persons to generation of noise levels in excess of standards or excessive groundborne vibration or noise. With regard to roadway noise associated with construction traffic on area roads, traffic volumes on roads with good operating conditions (i.e., Level of Service of B or better) would have to increase at more than a three-fold rate to reach the City’s threshold of significance of a 5 dBA increase

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and would need to increase even more on roads with poor operating conditions (i.e., Level of Service C or worse).

(c): No impact. Long term impacts from operation of the cell tower are not anticipated since cellular antennas do not generate noise. Minimal noise can be generated from the air conditioner for the equipment room, however modern air conditions operate within the noise limits of the Municipal Code.

(e and f): No impact. The project site is not located within an airport land use plan, within two miles of a public airport or public use airport, or within the vicinity of a private airstrip. Therefore, there is no impact in this regard.

13. POPULATION AND HOUSING. Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Response:

(a): No impact. The proposed project will induce substantial population growth in an area. The proposed project does not include residential development or increase existing long-term employment. With no increase in long-term employment, and no new homes proposed, the proposed project would not induce substantial population growth. Furthermore, the project site is located within a developed area, and no new roads or extensions of existing roads or other growth-accommodating infrastructure are proposed. Therefore, the proposed project would not directly or indirectly induce substantial population growth through extension of roads or other infrastructure. No impact would occur.

(b): No impact. There are no existing residential properties on the project site. Implementation of the proposed project would not displace housing. Therefore, no impacts on housing would occur.

(c): No impact. The proposed project would not displace substantial numbers of people, as it will be located on a currently unutilized portion of the civic center. No impact would occur.

14. PUBLIC SERVICES.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: | | | | |
| 1) Fire protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 2) Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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3) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Response:

(a1 through a5): No impact. The City of Downey is a urban full service community, providing its own police service, fire protection, library system, and park and recreation services. The Downey Unified School District provides all public education in the area. These services will not be impacted by construction and operation of the unmanned wireless communications facility. This project will not induce growth and will not create new jobs in the area. As such, no additional services will be required with the approval of this project.

15. RECREATION.

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Response:

(a and b): No impact. The proposed project will not create new households that could 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. The proposed project also would not increase long-term employment such that increased demand for neighborhood and regional parks or other recreational facilities would occur. Finally, adding the cellular site to the existing park will not draw additional users to the park. Therefore, the proposed project would not result in substantial physical deterioration of existing area recreational facilities or require the construction or expansion of recreational facilities.

16. TRANSPORTATION/TRAFFIC. Would the project:

a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Substantially increase hazards due to a design feature (e.g.,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Response:

(a and b): No impact. Construction of the proposed project would generate a minimal amount of traffic associated with workers traveling to and from the site. Given the limited construction and operational activities, these vehicle trips would not be sufficient to result in noticeable traffic impacts on the local roadway system or exceed any level of service standard established by the county congestion management agency for designated roads or highways. A long term traffic impact is not anticipated since the project will be unmanned and only typically requires a monthly maintenance visit.

(c): No impact. Due to the distance between the City of Downey and the airport aircraft that traverse the airspace above the City is at a sufficient altitude such that development within the City does not have the capabilities to create an impact.

(d): No impact. The proposed improvements will take place in the middle of a public park. They will not result in altering the streets or access to the site.

(e): No impact. Emergency services in the area are provided by the City of Downey Fire and Police Departments. These departments have reviewed the proposed project and have determined that the changes will not impact their operations, emergency access to the site, and/or emergency response from the site.

(f): No impact. Unmanned cellular sites do not generate additional parking demand since they only require a monthly visit for maintenance. Furthermore, the location of the cellular tower and accessory building will not alter the existing on-site parking.

(g): No impact. Due to the nature of the project and its physical location, it does not have the ability to impact alternative transportation policies.

17. UTILITIES AND SERVICE SYSTEMS. Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Have sufficient water supplies available to serve the project	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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from existing entitlements and resources, or are new or expanded entitlements needed?				
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Response:

(a and e): No impact. The City of Downey is an urban environment that is mostly built out. All utility and service systems are in place and typically have sufficient capacity to accommodate most construction that will occur in the City. The proposed project will not increase demand for water, generate new wastewater, or become a new source of solid waste. Furthermore, the construction of the new 480 square foot storage/equipment building will not result in a significant source of stormwater runoff, thus will not need additional stormwater drainage or storage.

18. MANDATORY FINDINGS OF SIGNIFICANCE.

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? “Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Response:

(a): No impact. As described throughout the preceding checklist sections, the proposed project will not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

Potentially Significant Impact - EIR Analysis Is required	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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(b): No impact. Based on the analysis contained within this Initial Study, the proposed project is not anticipated to create impacts that are individually limited, but cumulatively considerable.

(c): No impact. Based on the analysis contained within this Initial Study, the proposed project will not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly

SECTION IV. REFERENCES

1. ACRONYMS

Air Quality Management Plan	AQMP
Carbon Dioxide	CO ₂
Carbon Monoxide	CO
Best Management Practices	BMP
California Air Resources Board	CARB
California Ambient Air Quality Standards	CAAQS
California Building Code	CBC
California Department of Transportation	CALTRANS
California Environmental Quality Act	CEQA
City of Downey General Plan	VISION 2025
Clean Water Act	CWA
Conditional Use Permit	CUP
Congestion Management Plan	CMP
Environmental Impact Report	EIR
Federal Highway Administration	FHWA
Final Environmental Impact Report	FEIR
Fine Particulate Matter	PM _{2.5}
Global Warming Solutions Act	AB 32
Greenhouse gases	GHGs
Household Hazardous Wastes	HHW
Housing and Community Development	HCD
Inhalable Particulate Matter	PM ₁₀
Light Emitting Diode	LED
Los Angeles County Metropolitan Transportation Authority	METRO
Los Angeles Regional Water Quality Control Board	LARWQCB
Methane	CH ₄
Metropolitan Water District	MWD
National Pollution Discharge Elimination System	NPDES
Nitrous Oxide	N ₂ O
Ozone	O ₃
Regional Water Quality Control Board	RWQCB
South Coast Air Basin	SCAB
South Coast Air Quality Management District	SCAQMD
Southern California Association of Governments	SCAG
Sulfur Dioxide	SO ₂

2. LIST OF PREPARERS



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3. BIBLIOGRAPHY

The following documents have been references in preparing this initial study and are incorporated by reference. Copies of the documents are available for review with the project file.

California Building Code, as adopted by the City of Downey
City of Downey. Downey Vision 2025 General Plan
City of Downey. Downey Vision 2025 General Plan EIR.
City of Downey, Downtown Downey Specific Plan EIR
City of Downey, Tierra Luna EIR
City of Downey Zoning Code
South Coast Air Quality Management District. SCAQMD Air Quality Significance
Thresholds. March 2011
South Coast Air Quality Management District. Rule 403 – Fugitive Dust. June 2005