

**FINAL**

**INITIAL STUDY/  
MITIGATED NEGATIVE DECLARATION**

**GOODMAN COMMERCE CENTER  
CYPRESS, CALIFORNIA**

**MARCH 2023**



**This page intentionally left blank**



## TABLE OF CONTENTS

TABLE OF CONTENTS .....	i
LIST OF ACRONYMS AND ABBREVIATIONS .....	iii
<b>1.0 INTRODUCTION .....</b>	<b>1-1</b>
1.1 Index of Comments Received.....	1-2
1.2 Format of Response to Comments .....	1-2
<b>2.0 RESPONSE TO COMMENTS .....</b>	<b>2-1</b>
2.1 State Agencies .....	2-1
<b>3.0 ERRATA .....</b>	<b>3-1</b>

## APPENDICES

- A: DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
- B: TRAFFIC MEMORANDUM (URBAN CROSSROADS, MARCH 21, 2023)
- C: UPDATED TRAFFIC IMPACT ANALYSIS (URBAN CROSSROADS, FEBRUARY 9, 2023)



**This page intentionally left blank**



## LIST OF ACRONYMS AND ABBREVIATIONS

Caltrans	California Department of Transportation
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
City	City of Cypress
IS/MND	Initial Study/Mitigated Negative Declaration
NOI	Notice of Intent
project	Goodman Commerce Center project
SCAQMD	South Coast Air Quality Management District
TRU	transport refrigeration units
VMT	vehicle miles traveled



**This page intentionally left blank**



## 1.0 INTRODUCTION

This section comprises the Final Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Goodman Commerce Center Project (project) at 5757 Plaza Drive in the City of Cypress (City), California. The purpose of this document is to respond to all comments received by the City regarding the environmental information and analyses contained in the IS/MND. It is composed of an Errata (with ~~striketrough~~ and underline text showing changes from the original text), Traffic Analysis Appendices B and C, comments received during the public review period, and responses to those comments. The Draft IS/MND and its technical appendices are included as Appendix A to this Final IS/MND.

Consistent with *State CEQA Guidelines* Section 15073 and in accordance with the City's Local California Environmental Quality Act (CEQA) Procedures, a Notice of Intent (NOI) to adopt a Mitigated Negative Declaration was sent to responsible agencies and trustee agencies in addition to various public agencies, citizen groups, and interested individuals concerned with the project. In addition, the NOI was filed with the Orange County Clerk-Recorder and the State Clearinghouse on February 6, 2023.

The Draft IS/MND was circulated for public review for a period of 21 days, from February 6, 2023, to February 27, 2023. Copies of the Draft IS/MND were made available for public review at the Cypress Civic Center (by appointment only) and on the City's website for the proposed project. Comments were accepted for a period of 21 days to ensure adequate time for residents and agencies to comment on the Draft IS/MND. Two comment letters were received during the public review period. Comments were received from State agencies.

The City is the Lead Agency under CEQA and is required to consider agency and public comments on the IS/MND. Although preparation of responses to comments on an IS/MND is not required, responses have been prepared.

Information provided in this Final IS/MND clarifies, amplifies, or makes minor modifications to the Draft IS/MND. No significant changes have been made to the information contained in the Draft IS/MND as a result of the responses to comments, and no significant new information has been added that would require recirculation of the Draft IS/MND (*State CEQA Guidelines* Section 15073.5). An Errata to the Draft IS/MND has been prepared to make minor corrections and clarifications to the document based on the discovery of an error in the trip generation estimates for the existing uses on the project site in the Traffic Analysis.

Therefore, as stated above, this Final IS/MND includes an Errata containing revisions to the Draft IS/MND (with ~~striketrough~~ and underline showing changes from the original text), Traffic Analysis Appendices B and C, comments received during the public review period, and responses to those comments.



## 1.1 INDEX OF COMMENTS RECEIVED

The following is an index list of the agencies that commented on the IS/MND prior to the close of the public comment period. Each comment letter received is indexed with an alphanumeric code below.

### Comment Letter Index

Comment Code	Signatory	Date
<b>State Agencies</b>		
S-1	South Coast Air Quality Management District (SCAQMD)	February 24, 2023
S-2	California Department of Transportation, District 12 (Caltrans)	February 27, 2023

## 1.2 FORMAT OF RESPONSE TO COMMENTS

Responses to each of the comment letters are provided on the following pages. The comment index numbers are provided in the upper right-hand corner of each comment letter, and individual points within each letter are numbered along the right-hand margin of each letter. The City's responses to each comment letter immediately follow the letter and are referenced by index numbers in the margins. As noted in some of the responses, a proposed Errata, with text revisions, has been prepared and provided as Section 3.0 of this Final IS/MND to provide corrections and clarifications to the Draft IS/MND.





## 2.0 RESPONSE TO COMMENTS

### 2.1 STATE AGENCIES



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:  
[avelasco@cypress.org](mailto:avelasco@cypress.org)

February 24, 2023

Alicia Velasco, Planning Director  
City of Cypress Community Development Department  
5275 Orange Avenue  
Cypress, California 90630

Comment Letter S-1

## Mitigated Negative Declaration (MND) for the Proposed Goodman Commerce Center Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Cypress is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revisions to the CEQA air quality impacts analysis for transport refrigeration units (TRUs), information about South Coast AQMD Rules 2305 and 316, and information about South Coast AQMD rules and permits that the Lead Agency should include in the Final MND.

S-1-1

### South Coast AQMD Staff's Summary of Project Information in the MND

Based on the MND, the Proposed Project consists of construction and operation of two warehouses totaling 390,268 square feet<sup>1</sup> on 18.6 acres<sup>2</sup>. One warehouse will total 204,909 square feet and the other warehouse will total 185,359 square feet<sup>3</sup>. The MND assumes that 50% of the warehouse space will be refrigerated and 50% of all trucks accessing the Proposed Project Site will have TRUs<sup>4</sup>. Furthermore, the Proposed Project will have a total of 50 loading docks<sup>5</sup> and is expected to involve 194 truck trips per day<sup>6</sup>. The Proposed Project site is located near the northwest corner of Plaza Drive and McDonnell Drive in the City of Cypress, Orange County. Construction of the Proposed Project is anticipated to begin in March of 2023, occur in a single phase, and last 12 months<sup>7</sup>. Operation is expected to begin in 2024<sup>8</sup>.

S-1-2

### South Coast AQMD Staff's Comments

#### *Transport Refrigeration Units (TRUs)*

In the MND the Lead Agency proposes the operation of two warehouses totaling 390,268 square feet and assumes that 50% of the warehouse space may be refrigerated<sup>9</sup>. The CalEEMod output file in Appendix A also shows that the Proposed Project was modeled using the Land Use code of

S-1-3

<sup>1</sup> MND. 2.0 Project Description. Page 2-7.

<sup>2</sup> *Ibid.* Page 2-1.

<sup>3</sup> *Ibid.* Page 2-7.

<sup>4</sup> *Ibid.*

<sup>5</sup> *Ibid.*

<sup>6</sup> Appendix F. Traffic Analysis. Page 38.

<sup>7</sup> MND. 2.0 Project Description. Page 2-12.

<sup>8</sup> Appendix F. Traffic Analysis. Page 1.

<sup>9</sup> MND. 2.0 Project Description. Page 2-7

*Refrigerated Warehouse-No Rail* for half of the warehouse space (195,130 square feet)<sup>10</sup>. The MND further states that 50% of all trucks accessing the Proposed Project Site would have TRUs<sup>11</sup>. The Lead Agency does not, however, discuss in further detail information related to the use of these TRUs, such as the number of TRU trucks and the emissions generated from these TRUs (which are separate and in addition to the truck emissions that the TRUs are installed on). The negligibility of TRU information and their associated air quality emissions leads to underestimated operational emissions. South Coast AQMD staff therefore recommends that the Lead Agency review and revise emission calculations to include the pertinent TRU information, such as the number of TRU trucks and TRU emission calculations in addition to the truck emissions, and incorporate them in the Air Quality sections of the Final MND. If the TRU information and their associated emissions are not included in the Final MND, the Lead Agency should provide reasons for not including such revisions, supported by substantial evidence in the record.

S-1-3  
cont.

#### *South Coast AQMD Rule 2305 and Rule 316*

On May 7, 2021, South Coast AQMD's Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule WAIRE Program, and Rule 316 – Fees for Rule 2305. Rules 2305 and 316 are new rules that will reduce regional and local emissions of NOx and particulate matter (PM), including diesel PM, from mobile sources that are associated with warehouse activities. These emission reductions will reduce public health impacts for communities located near warehouses. Also, the emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt in to earn Points on behalf of their tenants if they so choose because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities.

S-1-4

Since the Proposed Project consists of development of approximately 390,268 square feet of warehouse uses (with both buildings totaling more than 100,000 square feet each of indoor warehouse floor space),<sup>12</sup> the Proposed Project's warehouse owners and future operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation<sup>13</sup>. Such information should be incorporated into the Final CEQA document. South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or

<sup>10</sup> Appendix A. Goodman Commerce Center Project, Summer. Page 39.

<sup>11</sup> MND. 2.0 Project Description. Page 2-7.

<sup>12</sup> *Ibid.*

<sup>13</sup> South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>.

email at (909) 396-3140 or [waire-program@aqmd.gov](mailto:waire-program@aqmd.gov). For implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage<sup>14</sup>.

S-1-4  
cont.

*South Coast AQMD Permits and Responsible Agency*

If implementation of the Proposed Project would require the use of new stationary equipment including but not limited to emergency generators, fire water pumps, boilers, etc., permits from South Coast AQMD are required. The Final MND should include a discussion on stationary equipment that will require South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used for the stationary sources in the Final MND will also be used as the basis for the permit conditions and limits for the Proposed Project. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

S-1-5

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Evelyn Aguilar, Air Quality Specialist, at [eaguilar@aqmd.gov](mailto:eaguilar@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development and Implementation

SW:EA  
ORC230207-05  
Control Number

---

<sup>14</sup> South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.



### 2.1.1 South Coast Air Quality Management District (SCAQMD) (S-1)

**Letter Code:** S-1

**Commenter:** Sam Wang, Program Supervisor, CEQA IGR. Planning, Rule Development, and Implementation

**Date:** February 24, 2023

#### Response to Comment S-1-1

This comment is introductory and provides a brief outline of the comments that are discussed later in the comment letter. No response is necessary.

#### Response to Comment S-1-2

This comment provides a brief summary of project-related information contained in the IS/MND. No response is necessary.

#### Response to Comment S-1-3

This comment states that the negligibility of transport refrigeration units (TRU) information and their associated air quality emissions leads to underestimated operational emissions and recommends that the IS/MND be revised to include TRU information, such as the number of TRU trucks and TRU emission calculations in addition to the truck emissions, and incorporate them into the Air Quality sections of the Final MND.

The air quality analysis assumed the trucks accessing the project site would idle using their main engines rather than an auxiliary power unit or plugging in to on-site electrical hookups throughout their time at the project site. This is a conservative assumption, as the loading docks are required to have electrical hookups and the trucks to have the ability to run their accessories from that electricity source during any extended period of idling, so it is likely that the trucks would only briefly operate on their own power when maneuvering on site. It was also assumed that any refrigerated trucks would use the electrical hookups to power the TRUs rather than operate their onboard diesel engines. Additionally, the California Air Resources Board (CARB) has developed a technical advisory<sup>1</sup> to transition to near-zero-emission technologies and ultimately zero-emission technologies. These technologies will be phased in over time, possibly beginning in the 2020s and extending out to 2050. As such, because TRU trucks would be required to plug in, any increase in emissions associated with TRUs would be minimal and would not result in a significant increase in emissions. Therefore, no revisions to the analysis in the Draft IS/MND are warranted.

#### Response to Comment S-1-4

This comments states that the proposed project's warehouse owners and future operators would be required to comply with SCAQMD's Rule 2305 and Rule 316 once the warehouse is occupied. The City of Cypress (City) acknowledges that the proposed project's future owners and operators would be required to comply with SCAQMD's Rule 2305 and Rule 316 and all other applicable air quality

<sup>1</sup> California Air Resources Board (CARB). 2017. *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways Technical Advisory*. April. Website: [https://ww2.arb.ca.gov/sites/default/files/2017-10/rd\\_technical\\_advisory\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf) (accessed February 2023).



regulations. Given the speculative nature of the proposed project (an operator has not yet been identified) and the fact that compliance with Rules 2305 and Rule 316 can be attained through a variety of emission reduction strategies that are selected by an individual warehouse operator, no changes to the Draft IS/MND are warranted.

#### **Response to Comment S-1-5**

This comment notes that the SCAQMD serves as a Responsible Agency under CEQA if the implementation of the proposed project requires permits from the agency related to the use of new stationary equipment. The comment also provides concluding remarks and agency contact information. The City of Cypress thanks the SCAQMD for its participation in the CEQA review process for the Goodman Commerce Center Project. At this time, a specific operator has not yet been identified for the proposed project. Therefore, it is not possible to determine which on-site equipment would be used on the project site and whether permits from SCAQMD would be required. Nevertheless, the Draft IS/MND presents a conservative analysis of the proposed project's air quality emissions based on available information. No further response is necessary.

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 12  
 1750 EAST 4<sup>TH</sup> STREET, SUITE 100  
 SANTA ANA, CA 92705  
 PHONE (657) 328-6000  
 FAX (657) 328-6522  
 TTY 711  
[www.dot.ca.gov/caltrans-near-me/district12](http://www.dot.ca.gov/caltrans-near-me/district12)



*Making Conservation  
 a California Way of Life.*

**Comment Letter S-2**

February 27, 2023

Ms. Alicia Velasco  
 Planning Director  
 City of Cypress  
 5275 Orange Ave.  
 Cypress, CA. 90630

File: LDR/CEQA  
 SCH: 2023010204  
 12-ORA-2023-02209  
 I-605, PM 1.408  
 SR-22, PM 0.932  
 I-405, PM 20.553  
 SR-39, PM 10.649

Dear Ms. Velasco,

Thank you for including the California Department of Transportation (Caltrans) in the review of the Mitigated Negative Declaration (MND) for the Goodman Commerce Center Project. The Developer proposes to construct the proposed project on an approximately 18.6-acre site located at 5757 Plaza Drive in the City of Cypress. The proposed project includes demolition of the existing building on the project site and the construction of two new warehouse buildings totaling approximately 390,268 square feet in size. The project site is currently developed with an approximately 336,643-square-foot two-story warehouse and office building. The existing building would be demolished and replaced with two new warehouse buildings. Building 1, which would be located on the eastern half of the project site and would be approximately 204,909 square feet in size, and Building 2, which would be located on the western half of the site and approximately 185,359 square feet in size. Both warehouses would include 10,000 square feet of office space that would be evenly split between the first and second floors. Both buildings would be two stories and a maximum of approximately 47 feet, 6 inches in height. Each building would include 25 loading docks that would face the interior of the project site. The proposed project would also include the installation of a sidewalk along the Plaza Drive frontage.

The project site is located north of the intersection of Plaza Drive and McDonnell Drive in the southern part of the City. Local access to the project site is 5757 Plaza Drive, Cypress, California and is approximately 2.2 miles west of State Route

**S-2-1**

39 (SR-39), approximately 2.8 miles east of Interstate 605 (I-605), and approximately 2.2 miles north of State Route 22 (SR-22) and Interstate 405 (I-405). State Routes 39 and 22, as well as Interstates 605 and 405 are owned and operated by Caltrans. Therefore, Caltrans is a responsible agency on this project, and has the following comments:

S-2-1  
cont.

### **Transportation and System Planning**

1. Please consider providing adequate wayfinding signage to nearby transit stops within the proposed project. Connectivity of first and last mile mobility options and transit services help integrate a complete multimodal transportation network.
2. Please Consider encouraging or incentivizing the use of transit among both construction workers of the proposed development and future employees. Increasing multimodal transportation will lead to a reduction to congestion, Vehicle Miles Traveled, and improve air quality.
3. Please consider the installation of a Class II or Class IV bike lane around the warehousing facility. Applicant should work with City of Cypress to enhance the bicycle and pedestrian environment, specifically on Katella Ave and Valley View street, where there is no bicycle facility at present.

S-2-2

S-2-3

S-2-4

### **Freight Operations and Planning**

4. According to the Traffic Report, “the Project is anticipated to generate 930 fewer two-way trips per day with a net reduction of 167 AM peak hour trips and net reduction of 168 PM peak hour trips (in PCE).” (Pg. 1.1-9). Please explain how this reduction was calculated, despite the project resulting in a net increase in warehousing space of 141,645 sq. ft. (390,268 sq. ft. (new) – 248,623 sq. ft. (old)). (See below)

S-2-5



**TABLE 5: TRIP GENERATION COMPARISON**

Land Use	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	
<b>Proposed Project</b>							
Passenger Cars:	25	3	28	8	27	35	498
Total Truck Trips (PCE):	10	15	25	9	10	19	458
<b>Total Trips (PCE)</b>	<b>35</b>	<b>18</b>	<b>53</b>	<b>17</b>	<b>37</b>	<b>54</b>	<b>956</b>
<b>Fully Occupied Existing Use</b>							
Passenger Cars:	148	23	171	31	134	165	1,230
Total Truck Trips (PCE):	37	12	49	18	39	57	656
<b>Total Trips (PCE)</b>	<b>185</b>	<b>35</b>	<b>220</b>	<b>49</b>	<b>173</b>	<b>222</b>	<b>1,886</b>
<b>Variance</b>							
Passenger Cars:	-123	-20	-143	-23	-107	-130	-732
Total Truck Trips (PCE):	-27	3	-24	-9	-29	-38	-198
<b>Total Trips (PCE)</b>	<b>-150</b>	<b>-17</b>	<b>-167</b>	<b>-32</b>	<b>-136</b>	<b>-168</b>	<b>-930</b>

S-2-5  
cont.

5. Please provide electric charging stations for trucks. Electric charging infrastructure provides trucks or transport refrigeration units access to power without running their engines, thus reducing greenhouse and heat emissions. In addition, the project would be preparing for the inevitable shift to alternative energy-fueled vehicles, per the governor's executive order N-79-20, which phases out sales of gas-powered trucks by 2035.
6. Please ensure that the project does not worsen truck parking shortages in the region. Potential options include providing on-site parking or contributing to a regional truck parking solution.
7. Please consider on-site truck parking facilities for drivers such as restrooms, lighting, trash facilities, drinking water, showers, and food or vending machines.
8. The number of parking spaces should be based on peak operating time of the development.

S-2-6

S-2-7

S-2-8

S-2-9

9. Coordination with short haul railroad operators to transport between distribution centers and warehouses, or ports and railyards can assist in creative solutions and efficiencies that can reduce air and/or noise pollution or parking/congestion concerns.

S-2-10

Caltrans' mission is to provide a safe, sustainable, equitable, integrated, and efficient transportation system to enhance California's economy and livability. Please continue to coordinate with Caltrans for any future developments that could potentially impact State transportation facilities. If you have any questions, please do not hesitate to contact Julie Lugaro at [Julie.lugaro@dot.ca.gov](mailto:Julie.lugaro@dot.ca.gov).

Sincerely,



Scott Shelley  
Branch Chief, Regional-IGR-Transit Planning  
Caltrans, District 12



### 2.1.2 California Department of Transportation (Caltrans) (S-2)

**Letter Code:** S-2

**Commenter:** Scott Shelley, Branch Chief, Regional-IGR-Transit Planning. Caltrans, District 12

**Date:** February 27, 2023

#### Response to Comment S-2-1

This comment is introductory and provides a brief overview of project-related information contained in the Draft IS/MND. No response is necessary.

#### Response to Comment S-2-2

This comment recommends the installation of wayfinding signage to nearby transit stops. This comment does not relate to the adequacy of the analysis contained in the Draft IS/MND. No response is necessary.

#### Response to Comment S-2-3

This comment recommends encouraging or incentivizing the use of transit to reduce congestion and vehicle miles traveled (VMT) and improve air quality. Potential impacts related to transportation, including congestion and VMT, are discussed in Section 4.17, Transportation, of the IS/MND. As discussed in Section 4.17, the proposed project would not result in any significant impacts related to congestion or VMT, and no mitigation measures are required. Potential impacts related to air quality are discussed in Section 4.3, Air Quality, of the IS/MND. As discussed in Section 4.3, all potential air quality impacts, including those related to transportation, would be less than significant without mitigation. Therefore, no revisions to the analysis in the Draft IS/MND are warranted.

#### Response to Comment S-2-4

This comment requests the installation of a Class II or Class IV bicycle lane around the proposed warehouse buildings and that the applicant work with the City of Cypress (City) to enhance the bicycle and pedestrian environment along Katella Avenue and Valley View Street. As described on page 4.17-3 of the Draft IS/MND, the proposed project would include the installation of sidewalks on the project site's frontage along Plaza Drive, which would provide a pedestrian connection to nearby bus stops on Katella Avenue. Therefore, the proposed project would be consistent with the City's General Plan circulation policies, and no mitigation measures would be required.

#### Response to Comment S-2-5

This comment requests clarification on how the net reduction of 167 AM and 168 PM net peak hour trips was calculated despite the proposed project resulting in an increase in approximately 141,645 square feet of warehousing space. As described on page 33 of the *Goodman Commerce Center Traffic Analysis* (Traffic Analysis) (Urban Crossroads, January 2023), which was included as Appendix F to the Draft IS/MND, the proposed project would replace an existing building that consists of 248,623 square feet of warehousing use and 88,020 square feet of office use. As shown in Table 4-2 of the Traffic Analysis, these existing uses are estimated to generate 220 AM peak hour trips and 222 PM peak hour trips, which includes 134 and 127 trips from the office use, respectively. Therefore, although the proposed project would result in an increase in warehouse space, it would



also result in a decrease in office space, thereby resulting in an overall decrease in vehicle trips. Therefore, no revisions to the analysis in the Draft IS/MND are warranted.

#### **Response to Comment S-2-6**

This comment requests that electric charging stations for trucks be provided. Please refer to Response S-1-3, above. As stated in that response, the proposed project's loading docks would be required to have electrical hookups and the trucks would be required to have the ability to run their accessories from that electricity source. Therefore, no revisions to the analysis in the Draft IS/MND are warranted.

#### **Response to Comment S-2-7**

This comment requests that the proposed project either include on-site parking or contribute to a regional truck parking solution. This comment does not relate to the adequacy of the analysis contained in the Draft IS/MND. No response is necessary.

#### **Response to Comment S-2-8**

This comment requests that on-site truck parking facilities, such as restrooms, lighting, trash facilities, drinking water, showers, and food or vending machines, be provided. This comment does not relate to the adequacy of the analysis contained in the Draft IS/MND. No response is necessary.

#### **Response to Comment S-2-9**

This comment states that the number of parking spaces should be based on peak operating time of the development. At this time, a specific operator has not yet been identified for the proposed project. Therefore, it is not possible to determine when the peak operating time would be. Further, parking-related impacts, such as insufficient parking supply to meet demand, are not considered impacts under CEQA.<sup>1</sup> This comment does not relate to the adequacy of the analysis contained in the Draft IS/MND. No response is necessary.

#### **Response to Comment S-2-10**

This comment states that coordination with short haul railroad operators can assist in creative solutions and efficiencies that can reduce air and/or noise pollution or parking/congestion concerns. As stated above, comments related to parking on the project site do not relate to the adequacy of the analysis contained in the Draft IS/MND, and no response is necessary.

As stated in Response S-2-3, all potential air quality impacts, including those related to transportation, would be less than significant without mitigation. Additionally, potential impacts related to noise are discussed in Section 4.13, Noise, of the Draft IS/MND. As discussed in Section 4.13, all potential impacts related to noise, including those related to transportation, would be less than significant without mitigation. Therefore, no revisions to the analysis in the Draft IS/MND are warranted.

---

<sup>1</sup> *Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist.* (2013) 215 Cal.App.4th 1013.



### 3.0 ERRATA

This section of the Final IS/MND provides changes to the Draft IS/MND that have been made to clarify, correct, or add to the environmental impact analysis for the proposed Goodman Commerce Center Project (proposed project). Such changes are a result of revisions made to the Traffic Analysis prepared for the project during the public review period for the Draft IS/MND. The changes described in this section are generally minor changes that do not constitute significant new information, change the conclusions of the environmental analysis, or require recirculation of the document (*State California Environmental Quality Act [CEQA] Guidelines* Section 15073.5).

Such changes to the Draft IS/MND are indicated in this section under the appropriate Draft IS/MND section.

Deletions are shown with ~~striketrough~~ and additions are shown with underline.

#### 1) Section 4.3, Air Quality, page 4.3-7, second paragraph

Long-term operational emissions associated with the existing uses were also evaluated in CalEEMod. The project site is developed with an existing 336,643-square-foot building; however, a total of 151,486 square feet of space is currently occupied. Therefore, the existing uses analysis evaluates 151,486 square feet of existing warehouse uses. Although the project's Traffic Analysis identifies an existing trip generation of ~~1,658~~1,382 ADT associated with the total 336,643-square-foot building, this analysis assumes a scaled existing trip generation of approximately 916 ADT based on the currently occupied space.

This revision corrects an error in the Traffic Analysis related to the trip generation estimates for the existing land uses on the project site. On March 21, 2023, Urban Crossroads provided a memorandum summarizing corrections made to the trip generation estimates for the project, which were included in the updated version of the Traffic Analysis dated February 9, 2023 (Updated Traffic Analysis). The memorandum prepared by Urban Crossroads and the Updated Traffic Analysis are included as Appendix B and Appendix C to this Final IS/MND, respectively.

As described in the memorandum prepared by Urban Crossroads, an error was identified in the truck summation found on the Existing Trip Generation Summary (Table 4-2) of the January 27, 2023, version of the Traffic Analysis, which was included as Appendix F to the Draft IS/MND. Specifically, the total trucks line incorrectly referenced the total trips (passenger cars plus trucks) for the warehousing use as opposed to only the total trucks. As such, the total trips and the net change in project trip calculations found in Table 4-4 of the Traffic Analysis were also incorrect. The Updated Traffic Analysis corrects the error in Table 4-2 and the corresponding net change in vehicle trips in Table 4-4. The Updated Traffic Analysis confirms that the proposed project is still anticipated to result in a net reduction in trips in comparison to the existing uses on the project site; however, the net reduction would not be as great as previously noted in the January 27, 2023, version of the Traffic Analysis.

Upon review of the peak hour operations analyses, Urban Crossroads noted that the trip generation estimate used in the traffic modeling software was based on a separate trip generation calculation



and did not use the incorrect totals found in Table 4-2 and Table 4-4 of the Traffic Analysis. As such, no revisions were necessary to the operations analyses and the results presented in the January 27, 2023, and February 9, 2023, versions of the Traffic Analysis are identical. There were no deficiencies identified and off-site improvements were not recommended.

As described above, the air quality analysis in the Draft IS/MND assumed that the existing uses on the project site generate fewer trips than what was assumed in the Traffic Analysis. This assumption yields a more conservative air quality analysis as it assumes that the project would generate a greater net increase in emissions over existing conditions than the corrected trip generation estimate suggests. Given that this correction does not affect the validity of the air quality analysis or any of the conclusions contained in the Draft IS/MND, no further revisions to the air quality analysis are required.

## 2) Section 4.3, Air Quality, page 4.3-7, footnote 11

<sup>11</sup> Urban Crossroads. 2023. *Goodman Center Commerce Center Traffic Analysis*. January 27/February 9.

This revision has been made to reflect the date of the Updated Traffic Analysis provided by the Applicant on February 9, 2023. It should be noted that the trip generation error in the Traffic Analysis was not discovered until after the public review period for the Draft IS/MND started on February 6, 2023.

## 3) Section 4.6, Energy, pages 4.6-3 and 4.6-4

In addition, the proposed project would result in energy usage associated with gasoline and diesel to fuel project-related trips. Trip generation rates used in CalEEMod for the proposed project were based on the project's trip generation estimates identified in the proposed project's Traffic Analysis (provided in Appendix F of this IS/MND).<sup>25</sup> The proposed project would generate a total of 692 ADT, of which 276 ADT would be for the unrefrigerated warehouse and 416 ADT would be for the refrigerated warehouse. The total 692 ADT would include 498 passenger vehicle trips, 60 two-axle truck trips, 26 three-axle truck trips, and 126 four-axle truck trips, which was included in CalEEMod. In addition, although the project's Traffic Analysis identifies an existing trip generation of ~~1,658~~1,382 ADT associated with the 336,643-square-foot building that currently exists on the project site, this analysis assumes a scaled existing trip generation of approximately 916 ADT.

This revision corrects an error in the trip generation estimates for the existing land uses on the project site, as described in the Updated Traffic Analysis. Similar to the air quality analysis, the energy analysis in the Draft IS/MND assumed that the existing uses on the project site generate fewer trips than what was assumed in the Traffic Analysis. This assumption yields a more conservative energy analysis as it assumes that the project would require a greater net increase in energy consumption over existing conditions than the corrected trip generation estimate suggests. Given that this correction does not affect the validity of the energy analysis or any of the conclusions contained in the Draft IS/MND, no further revisions to the energy analysis are required.



**4) Section 4.6, Energy, page 4.6-3, footnote 25**

<sup>25</sup> Urban Crossroads. 2023. *Goodman Center Commerce Center Traffic Analysis*. ~~January 27~~February 9.

This revision has been made to reflect the date of the Updated Traffic Analysis provided by the Applicant on February 9, 2023.

**5) Section 4.8, Greenhouse Gas Emissions, page 4.8-3, third paragraph**

In addition, long-term operational emissions associated with the existing uses were evaluated in CalEEMod. The project site is developed with an existing 336,643-square-foot building; however, a total of 151,486 square feet of space is currently occupied. Therefore, the existing uses analysis evaluates 151,486 square feet of existing warehouse uses. Although the project's Traffic Analysis identifies an existing trip generation of ~~1,6581,382~~ ADT associated with the total 336,643-square-foot building, this analysis assumes a scaled existing trip generation of approximately 916 ADT.

This revision corrects an error in the Traffic Analysis related to the trip generation estimates for the existing land uses on the project site. Similar to the air quality and energy analyses, the greenhouse gas emissions analysis in the Draft IS/MND assumed that the existing uses on the project site generate fewer trips than what was assumed in the Traffic Analysis. This assumption yields a more conservative greenhouse gas emissions analysis as it assumes that the project would generate a greater net increase in emissions over existing conditions than the corrected trip generation estimate suggests. Given that this correction does not affect the validity of the greenhouse gas emissions analysis or any of the conclusions contained in the Draft IS/MND, no further revisions to the greenhouse gas emissions analysis are required.

**6) Section 4.8, Greenhouse Gas Emissions, page 4.8-3, footnote 31**

<sup>31</sup> Urban Crossroads. 2023. *Goodman Center Commerce Center Traffic Analysis*. ~~January 27~~February 9.

This revision has been made to reflect the date of the Updated Traffic Analysis provided by the Applicant on February 9, 2023.

**7) Section 4.13, Noise, page 4.13-12, footnote 53**

<sup>53</sup> Urban Crossroads. 2023. *Goodman Center Commerce Center Traffic Analysis*. ~~January 27~~February 9.

This revision has been made to reflect the date of the Updated Traffic Analysis provided by the Applicant on February 9, 2023. The traffic noise analysis in the Draft IS/MND concluded that any increase in noise associated with project-related traffic would be very small, ranging from 0.0 to 1.0 A-weighted decibel (dBA) along the roadway segments that were analyzed. These noise level increases would not be perceptible to the human ear. The corrections made to the trip generation estimates for the existing uses on the project site would not affect this conclusion as the traffic noise analysis already assumes the project would result in small traffic volume increases on nearby



roadway segments because the project would redevelop the existing partially vacant uses on the project site with a project that would generate additional trips over the actual existing conditions. This assumption yields a more conservative traffic noise analysis as it assumes that the project would generate a greater net increase in traffic over existing conditions than the corrected trip generation estimate suggests. Given that this correction does not affect the validity of the traffic noise analysis or any of the conclusions contained in the Draft IS/MND, no further revisions to the traffic noise analysis are required.

**8) Section 4.17, Transportation, page 4.17-1, first paragraph**

**Discussion**

The following section describes the potential transportation impacts related to the proposed project based on the *Goodman Commerce Center Traffic Analysis* prepared by Urban Crossroads, dated ~~January 27~~ February 9, 2023 (Appendix F of this IS/MND) and the Vehicle Miles Traveled (VMT) Analysis, prepared by LSA Associates, Inc., dated October 18, 2022 (Appendix G of this IS/MND).

This revision has been made to reflect the date of the Updated Traffic Analysis provided by the Applicant on February 9, 2023.

**9) Section 4.17, Transportation, page 4.17-2, fourth paragraph and Table 4.17.A**

As Table 4.17.A shows, the proposed project is anticipated to generate 930690 fewer two-way trips per day with a net reduction of 140167 a.m. peak hour trips and net reduction of 129168 p.m. peak hour trips (in actual vehicles ~~passenger car equivalents [PCE]~~).

**Table 4.17.A: Proposed Project Trip Generation Comparison**

Land Use	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
<b>Proposed Project Trip Generation</b>							
Passenger Cars	498	25	3	28	8	27	35
Total Truck Trips (actual vehicles PCE)	<u>194458</u>	<u>310</u>	<u>415</u>	<u>725</u>	<u>49</u>	<u>410</u>	<u>89</u>
<b>Total Trips (actual vehicles PCE)</b>	<b><u>692956</u></b>	<b><u>2835</u></b>	<b><u>718</u></b>	<b><u>3553</u></b>	<b><u>1217</u></b>	<b><u>3137</u></b>	<b><u>4354</u></b>
<b>Fully Occupied Existing Trip Generation</b>							
Passenger Cars	1,230	148	23	171	31	134	165
Total Truck Trips (actual vehicles PCE)	<u>152656</u>	<u>237</u>	<u>212</u>	<u>449</u>	<u>418</u>	<u>339</u>	<u>757</u>
<b>Total Trips (actual vehicles PCE)</b>	<b><u>1,3821,886</u></b>	<b><u>150185</u></b>	<b><u>2535</u></b>	<b><u>175220</u></b>	<b><u>3549</u></b>	<b><u>137173</u></b>	<b><u>172222</u></b>
<b>Net Trips (Proposed Project - Existing)</b>	<b><u>-690930</u></b>	<b><u>-122150</u></b>	<b><u>-1817</u></b>	<b><u>-140167</u></b>	<b><u>-2332</u></b>	<b><u>-106136</u></b>	<b><u>-129168</u></b>

<sup>1</sup> Trip rates from the Institute of Transportation Engineers' (ITE) *Trip Generation Manual*, 11<sup>th</sup> Edition (2021).

This revision corrects an error in the Traffic Analysis related to the trip generation estimates for the existing land uses on the project site. As discussed above, this correction does not affect the validity of the Traffic Analysis or any of the conclusions contained in the Draft IS/MND because the correct trip generation estimates were used in the Traffic Analysis. No further revisions to the Traffic Analysis are required.





**10) Chapter 8.0, References, page 8-2**

Urban Crossroads. 2023. Goodman Center Commerce Center Traffic Analysis. ~~January 27~~February 9.

This revision has been made to reflect the date of the Updated Traffic Analysis provided by the Applicant on February 9, 2023.

**11) Chapter 8.0, References, page 8-3**

Urban Crossroads. 2023. Goodman Center Commerce Center Traffic Analysis. ~~January 27~~February 9.

This revision has been made to reflect the date of the Updated Traffic Analysis provided by the Applicant on February 9, 2023.

**12) Chapter 8.0, References, page 8-4**

Urban Crossroads. 2023. Goodman Center Commerce Center Traffic Analysis. ~~January 27~~February 9.

This revision has been made to reflect the date of the Updated Traffic Analysis provided by the Applicant on February 9, 2023.

**13) Chapter 8.0, References, page 8-6**

Urban Crossroads. 2023. Goodman Center Commerce Center Traffic Analysis. ~~January 27~~February 9.

This revision has been made to reflect the date of the Updated Traffic Analysis provided by the Applicant on February 9, 2023.

**14) Chapter 8.0, References, page 8-7**

Urban Crossroads. 2023. Goodman Center Commerce Center Traffic Analysis. ~~January 27~~February 9.

This revision has been made to reflect the date of the Updated Traffic Analysis provided by the Applicant on February 9, 2023.



**This page intentionally left blank**



## APPENDIX A

# DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION



**This page intentionally left blank**



---

## APPENDIX B

### TRAFFIC MEMORANDUM (URBAN CROSSROADS, MARCH 21, 2023)



**This page intentionally left blank**



## APPENDIX C

# UPDATED TRAFFIC IMPACT ANALYSIS (URBAN CROSSROADS, FEBRUARY 9, 2023)



**This page intentionally left blank**