



## MEMORANDUM

**DATE:** June 25, 2024

**TO:** Alicia Velasco Director of Planning/Community Development. City of Cypress

**FROM:** Ryan Bensley, Principal, LSA

**SUBJECT:** 5665 Plaza Drive Project Scoping Summary

LSA has completed its review of the written comments submitted to the City of Cypress (City) during the public review period, from May 7, 2024, through June 5, 2024, for the Notice of Preparation (NOP) prepared for the 5665 Plaza Drive Project. The table below provides a summary of the specific issues raised by each commenter and indicates whether the comment will be addressed in the Environmental Impact Report (the City is not required to address comments that do not raise environmental issues). In some cases, the comments require action items from the team. A copy of each written NOP comment submitted to the City is also attached.

### Summary of Scoping Comments Received by the City of Cypress

Date	Commenter	General Issue(s) Raised	Specific Issue(s) Raised	Comment to be Addressed in EIR?
May 10, 2024	Native American Heritage Commission (NAHC)	Tribal Cultural Resources	Outlined the City's tribal consultation requirements under Assembly Bill 52 and Senate Bill 18	Yes
June 5, 2024	Los Alamitos	Air Quality, Greenhouse Gas Emissions, Traffic	The commenter requested that the Draft EIR include the proposed project's impact on truck routes, noise, air quality and greenhouse gas emissions, and traffic.	Yes
June 5, 2024	Warland Investments Company and Affiliated Entities (Allyssa J. Holcomb)	Air Quality, Greenhouse Gas Emissions, Noise Land Use, Traffic	<p>The commenter suggest that the proposed project has a foreseeable potential use as a logistics center, stating that logistics centers can generate more significant noise, congest local streets, contribute to excessive air pollution, and potentially lower property values in the surrounding areas, compared to warehouse projects. The commenter also mentions that while logistics uses are not permitted under the current zoning regulations in the City that the City should not limit the scope of the EIR to only current permitted uses.</p> <p>Additionally, in a previous letter dated March 7, 2024, which was included as an attachment in the June 5, 2024 letter, the commenter states their concerns related to the incomplete truck distribution map, increased truck traffic, failure to analyze refrigerated trucks, the failure to analyze off-site air quality impacts, the failure to meet "Less than Significant" emissions, the failure to analyze the effects of off-site GHG emissions, and the failure to adequately evaluate cumulative impacts.</p>	Yes

Attachments: A: Native American Heritage Commission (NAHC) Letter (5 pages)  
 B: Los Alamitos Letter (2 pages)  
 C: Warland Investments Company and Affiliated Entities Letter (40 pages)

## ATTACHMENT A

### NATIVE AMERICAN HERITAGE COMMISSION (NAHC) LETTER

**NATIVE AMERICAN HERITAGE COMMISSION**

May 10, 2024

Alicia Velasco  
City of Cypress  
5275 Orange Avenue  
Cypress CA 90630

CHAIRPERSON  
**Reginald Pagaling**  
Chumash

VICE-CHAIRPERSON  
**Buffy McQuillen**  
Yokayo Pomo, Yuki,  
Nomlaki

SECRETARY  
**Sara Dutschke**  
Miwok

PARLIAMENTARIAN  
**Wayne Nelson**  
Luiseño

COMMISSIONER  
**Isaac Bojorquez**  
Ohlone-Costanoan

COMMISSIONER  
**Stanley Rodriguez**  
Kumeyaay

COMMISSIONER  
**Laurena Bolden**  
Serrano

COMMISSIONER  
**Reid Milanovich**  
Cahuilla

COMMISSIONER  
**Bennae Calac**  
Pauma-Yuima Band of  
Luiseño Indians

EXECUTIVE SECRETARY  
**Raymond C.  
Hitchcock**  
Miwok, Nisenan

**NAHC HEADQUARTERS**  
1550 Harbor Boulevard  
Suite 100  
West Sacramento,  
California 95691  
(916) 373-3710  
[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)

**Re:**  
**2024040017, 5665 Plaza Drive Project, Orange County**

Dear Ms. Velasco:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

## AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
  
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
  
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
  
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
  
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
  
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a. Avoidance and preservation of the resources in place, including, but not limited to:
    - i. Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i. Protecting the cultural character and integrity of the resource.
    - ii. Protecting the traditional use of the resource.
    - iii. Protecting the confidentiality of the resource.
  - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

## NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([https://ohp.parks.ca.gov/?page\\_id=30331](https://ohp.parks.ca.gov/?page_id=30331)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:

a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.

b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

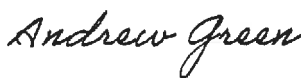
a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)).<sup>\*</sup> In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.

b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.

c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:  
[Andrew.Green@NAHC.ca.gov](mailto:Andrew.Green@NAHC.ca.gov).

Sincerely,



Andrew Green  
Cultural Resources Analyst

cc: State Clearinghouse

## **ATTACHMENT B**

### **LOS ALAMITOS LETTER**





June 5, 2024

Alicia Velasco  
Planning Director  
City of Cypress  
5275 Orange Avenue  
Cypress, CA 90603  
741-229-6720  
[avelasco@cypressca.org](mailto:avelasco@cypressca.org)

**SUBJECT: RESPONSE TO NOTICE OF PREPARATION FOR WAREHOUSE  
PROJECT AT 5665 PLAZA DRIVE**

Dear Director Velasco:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Draft Environmental Impact Report (DEIR) for the warehouse project proposed at 5665 Plaza Drive in the City of Cypress. We understand that the project includes a Specific Plan Amendment, lot line adjustment, and site plan review to evaluate the demolition of an existing office building and construction of a new 191,384 square-foot light industrial building consisting of 25 loading docks on an approximately 8.53-acre site.

The City of Los Alamitos is concerned with the potential impacts of the project on our adjacent community, especially with respect to noise, air quality, and roadway impacts. We have prepared the following comments on the NOP for your consideration at this time:

1. Truck Routes – The DEIR should outline existing truck routes, the project's impact to/along the truck routes, and any impacts or needs to modify truck routes.
2. Noise—The DEIR should evaluate the project's noise impact due to the change in land use, proximity to sensitive receptors, and maximum noise levels indicated in any applicable General Plans, including the City of Los Alamitos General Plan.
3. Air Quality—The DEIR should evaluate the project's impact on air quality, specifically related to greenhouse gas increases, due to the proposed change in land use.
4. Traffic Impact - The project should provide traffic and/or access analyses that evaluate the daily truck trips and their distribution and influence on Los Alamitos roadways. In particular, the analysis should outline the anticipated distribution of trucks between the Interstate-605 and Interstate-405 freeways, the maintenance

responsibility or costs for project trips along and roadway wear and tear impact to Los Alamitos roadways, and the sufficiency of existing Los Alamitos roadways including the left-turn median capacity for eastbound Katella Avenue at Douglas Drive.

Thank you again for the opportunity to provide comments on the NOP for the 5665 Plaza Drive warehouse project. The City of Los Alamitos looks forward to receiving a copy of the DEIR once it is available for review.

If you have any questions regarding the City's comments, please contact Tom Oliver, Associate Planner, at [toliver@cityoflosalamitos.org](mailto:toliver@cityoflosalamitos.org) or 562-431-3538 ext. 303.

Sincerely,

A handwritten signature in blue ink that reads "R. Noda". The signature is fluid and cursive, with the first name "R." and the last name "Noda" clearly visible.

Ron Noda  
Deputy City Manager/Development Service Director

cc: Chet Simmons, City Manager  
Irving Montenegro Jr., Development Services Manager  
Tom Oliver, Associate Planner  
Chris Kelley, City Engineer  
Farhad Iranitalab, Traffic Engineer

## **ATTACHMENT C**

### **WARLAND INVESTMENTS COMPANY AND AFFILIATED ENTITIES LETTER**



Allyssa J. Holcomb

Direct Dial No.  
(714) 384-4313

Email Address  
aholcomb@garrettllp.com

June 5, 2024

**VIA EMAIL** ([avelasco@cypressca.org](mailto:avelasco@cypressca.org))

City of Cypress  
5275 Orange Avenue  
Cypress, CA 90630  
Attn: Alicia Velasco, Planning Director

**Re: Warland Investments Company and Affiliated Entities' Comments on Scope of EIR;  
5665 Plaza Drive - Goodman Redevelopment**

Dear Ms. Velasco:

As you know, this firm represents Warland Investments Company and its affiliated entities (collectively, "**Warland**"), which is an interested party by virtue of being one of the largest landowners within the City of Cypress ("**City**"). Warland's holdings include over a dozen properties located in the City's business park and within a mile of the above-referenced project (hereinafter referred to as "**5665 Redevelopment**"). We are submitting this letter on behalf of Warland as a follow-up to our oral comments during the public scoping meeting held on May 28, 2024.

Reference is made to our letter to the City dated March 7, 2024, a copy of which is enclosed, which addressed Warland's high-level comments regarding the Initial Study and draft Mitigated Negative Declaration (collectively, "**IS/MND**") originally prepared by the City in connection with the 5665 Redevelopment.

As we have previously expressed, Warland supports the continuing development of business and housing in the City and believes that the right type of redevelopment within the business park will be embraced by the City's residents and result in the continued long-term success of the business park and the community as a whole. However, as you are aware, Warland has concerns regarding the intended redevelopment project by GLC Cypress LLC ("**Goodman**"), the first phase of which consisted of two (2) warehouse buildings located at 5757 Plaza Drive, which is publicly referred to as "Goodman Commerce Center" and was approved by the City last year, and the second phase of which is the current 5665 Redevelopment consisting of a single warehouse building. The three (3) adjacent warehouses, which are located in very close proximity to one another, will have almost 600,000 cumulative square feet of space and 75 dock doors, allowing for exceptionally high truck volume to originate from the center of the business park.

Warland appreciates the City pivoting from the previously prepared IS/MND and proceeding with an environmental impact report ("**EIR**") as requested in our March 7 letter. However, the 5665 Redevelopment is described in the City's Notice of Preparation of Draft Environmental Impact Report dated May 7, 2024 ("**NOP**") as a standalone warehouse project, which is inaccurate and misleads the public as to the true nature of the redevelopment. In reality, the 5665 Redevelopment is the second

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phase of a larger project consisting of the redevelopment by Goodman of 5665 Plaza Drive and 5757 Plaza Drive. **In order to satisfy the requirements of CEQA and to provide complete and accurate information to the public, the EIR must (i) fully analyze the cumulative environmental impacts of the entire 3-building redevelopment of 5665 and 5757 Plaza Drive, and (ii) account for the foreseeable use of the entire project for logistics purposes.**

### 1. Defined Project / Cumulative Impacts of 5665 Plaza Drive and 5757 Plaza Drive

Goodman’s redevelopment of 5665 Plaza Drive and 5757 Plaza Drive are not two separate projects, but are actually two phases of a single larger project. Goodman purchased both parcels at the same time and as a part of the same transaction, but they nevertheless elected to submit separate applications to the City for the development of the same, which resulted in two separate IS/MNDs being performed. Doing so obscures the cumulative environmental impacts of the entire project from both the public and the City itself, which can result in a dangerous failure to address the potential mitigation of the environmental impacts of the overall project. To ensure that the cumulative environmental impacts of the overall project are properly evaluated and addressed, the EIR must accurately define the project as the redevelopment of both 5665 and 5757 Plaza Drive.<sup>1</sup>

As we have previously communicated to the City, there are several points that evidence the fact that 5665 and 5757 Plaza Drive will be operated as a single project, as follows:

- a. Goodman acquired both parcels, which are adjacent to one another, on the same day (i.e., September 15, 2021), via a single deed, and it continues to own both parcels.
- b. The two parcels will have a shared drive aisle providing ingress and egress to the public right-of-way (i.e., they are physically connected); further, the 5665 Redevelopment includes a lot line adjustment in order to create such shared drive aisle.
- c. Since both parcels are owned by the same party, it is foreseeable that there will be cross-access and cross-parking between the two parcels, as well, which will allow trucks using the cumulative **75 dock doors** to enter and exit the project using any one of the **5 driveways** serving the same.
- d. The City’s own website referred to the 5665 Redevelopment as “Goodman Commerce Center – Expansion” for several months. However, at some point after receiving our March 7 letter (which addressed the issue), the City changed its website to describe the 5665 Redevelopment more generically as “Proposed Warehouse Project”.
- e. Similarly, the site plan on the City’s website labeled the building to be constructed at 5665 Plaza Drive as “Building 3”, while the buildings being constructed on 5757 Plaza Drive are referred to as “Bldg. 1” and “Bldg. 2” in the site plan published by the City with respect to that parcel. However, like the project title, the depiction of the 5665 Plaza Drive building on the City’s website is now generically labeled “5665” instead of “Building 3”.

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<sup>1</sup> CEQA defines a “project” as “the whole of an action” which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that involves an activity that requires a governmental agency’s entitlement. Cal. Code Regs. tit. 14, § 15378.

- f. As noted in our March 7 letter, when viewing the two separate site plans originally posted to the City’s website together (see attached Schedule 1, which was attached to our March 7 letter), it is clear that the three (3) buildings have always been designed to operate as a single project. To that point, a new cumulative site plan, the first page of which is shown in the attached Schedule 2, was published on the City’s website after our March 7 letter. This cumulative site plan makes it clear that the prior site plans for 5665 and 5757 Plaza Drive published by the City were taken from the same original site plan.

It is apparent that Goodman intended to redevelop 5665 and 5757 Plaza Drive as a single project from the beginning; however, it applied for the City’s approval of the project in two phases, approximately a year apart. There is little reason to do so other than to avoid the preparation of an EIR, which may disclose environmental impacts that cannot be mitigated. While the City has already approved the first phase of the project (i.e., the redevelopment of 5757 Plaza Drive), the approvals for the two phases of the project (i.e., the redevelopment of 5665 and 5757 Plaza Drive) were nonetheless improperly piecemealed, which violates the mandates of CEQA. Instead of compounding the harm that may have been caused by such piecemealing, the City must take this opportunity to perform a proper EIR that accurately defines the “project” as both phases of the Goodman redevelopment at 5665 and 5757 Plaza Drive, and thoroughly evaluates the cumulative environmental impacts of the same.

Further, please note that even if the 5665 Redevelopment was a standalone project (which it is not), the factors set forth above make it clear that 5665 and 5757 Plaza Drive *may* be operated as a single project, either now or later – and that risk is compounded by the fact that one party owns both parcels and can operate them as a cohesive project. CEQA demands that the City evaluate the short and long-term environmental impacts that will result from any proposed project, both individually and cumulatively with other projects in the area, and accurately communicate those impacts to the public. Given the *potential* of 5665 and 5757 Plaza Drive to be operated as a single project, the EIR must fully and accurately evaluate the cumulative environmental impacts of 5665 and 5757 Plaza Drive, including, without limitation, the impacts that will result from the same being operated as a single project as designed.

## 2. Foreseeable Potential Use as a Logistics Center

Environmental studies prepared by a lead agency in connection with a redevelopment are intended to evaluate “past, present, and reasonably anticipated future” uses, even if such reasonably anticipated future uses are not permitted under current zoning regulations.<sup>2</sup> For the reasons detailed below, the EIR must consider the foreseeable use of all three (3) buildings for logistics purposes, which would likely involve a very high volume of trucks traveling throughout the City’s business park and nearby residential areas.

There are several substantive points evidencing that a logistics (or distribution) use of both 5665 and 5757 Plaza Drive can and should be anticipated, as follows:

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<sup>2</sup> Cal. Code Regs. tit. 14, § 15130.

- a. Goodman is a well-known developer of logistics centers; in fact, its own website expressly states that Goodman’s purpose is to develop “logistics space for the world’s greatest ambitions”.<sup>3</sup>
- b. The cumulative design of 5665 and 5757 Plaza Drive mirrors the design of other logistics centers developed by Goodman in California, including (a) the size (i.e., almost 600,000 cumulative square feet, disbursed through multiple buildings), and (b) the number of dock doors (i.e., 25 dock doors on each building, with **75** dock doors total). None of the Goodman developments in California that are used for non-logistics purposes have a similar building design – nor a similar number of dock doors. *In fact, Goodman’s non-logistics developments in California have a **maximum** of **10** dock doors.*
- c. Goodman has developed several logistics centers in California with buildings on two (2) separate parcels operating as a single project. Specifically, Goodman Logistics Center Rancho Cucamonga and Goodman Industrial Center Napoleon are single projects with multiple buildings located on adjacent properties, while Goodman Logistics Center Fontana II and III are two phases of the same project, with buildings located on adjacent properties (*see Schedule 10* of our March 7 letter for a list of Goodman’s California projects).
- d. While Goodman has suggested that it anticipates the project being used for “corporate headquarters”, distribution centers typically have less than ten percent (10%) of space dedicated to office area<sup>4</sup>, while other types of users, such as corporate offices, require substantially more office space to operate. Currently, less than 10% of each building to be constructed at 5665 and 5757 Plaza Drive is designated for office use.
- e. The City is actively in the process of “modernizing” the City’s Specific Plans and a logistics or distribution use may be permitted under such modernized Specific Plan, either explicitly or as a result of the discretionary approval of the City’s Planning Department.

Unlike typical warehousing projects, logistics centers can generate more significant noise, congest local streets, contribute to excessive air pollution and potentially lower property values in the surrounding areas. While logistics uses are not permitted under the current zoning regulations applicable to the project, in light of the foregoing and the factors outlined above, the City must not limit the scope of the EIR to currently permitted uses. Instead, in accordance with the requirements of CEQA, the EIR *must* evaluate the reasonably foreseeable use of the project for logistics purposes.

*[Remainder of Page Intentionally Left Blank]*

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<sup>3</sup> <https://www.goodman.com/about-goodman/about-us>.

<sup>4</sup> [https://aquilacommercial.com/learning-center/types-of-industrial-buildings-defined-warehouse-flex-distribution-etc/#:~:text=Bulk%20distribution%20warehouses%20are%20ideal,rest%20dedicated%20to%20warehouse%20space](https://aquilacommercial.com/learning-center/types-of-industrial-buildings-defined-warehouse-flex-distribution-etc/#:~:text=Bulk%20distribution%20warehouses%20are%20ideal,rest%20dedicated%20to%20warehouse%20space;);

City of Cypress  
Alicia Velasco, Planning Director  
June 5, 2024  
Page 5

Notwithstanding the overwhelming evidence of Goodman's plans with respect to the redevelopment of 5665 and 5757 Plaza Drive, the City has thus far failed to consider the full scope of the project by improperly piecemealing the phases of the project and failing to consider the foreseeable use of the same as a logistics center. In its preparation of the EIR, Warland urges the City to properly define the proposed project and the foreseeable use thereof in order to satisfy its obligations under CEQA. Please be aware that Warland has engaged land use attorneys, environmental consultants and traffic consultants to perform a thorough peer review of the draft EIR and the conclusions presented therein, and Warland expressly reserves all rights and remedies associated therewith.

We appreciate your time and consideration on these matters.

Regards,



Allyssa J. Holcomb

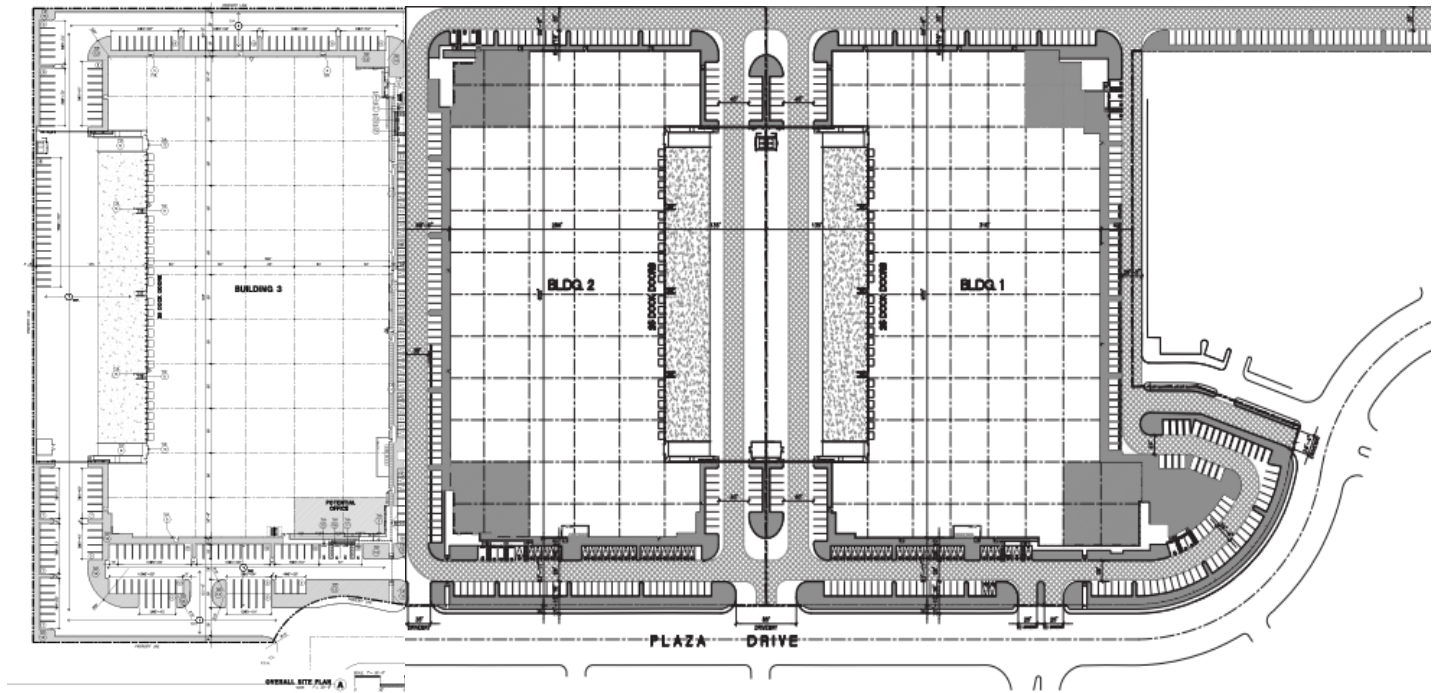
Enc.

cc: City Clerk of the City of Cypress *(via email)*  
Mr. Peter Grant, City Manager *(via email)*  
Mayor Scott Minikus, City Council, City of Cypress *(via email)*  
Mayor Pro Tem Bonnie Peat, City Council, City of Cypress *(via email)*  
Council Member David Burke, City Council, City of Cypress *(via email)*  
Council Member Anne Mallari, City Council, City of Cypress *(via email)*  
Council Member Frances Marquez, Ph.D., City Council, City of Cypress *(via email)*  
Fred Galante, Esq., City Attorney, City of Cypress *(via email)*  
Mr. Carl W. Robertson, Jr., Warland Investments Company *(via email)*  
Ms. Hope Warschaw, Warland Investments Company *(via email)*  
Mr. Jim Brulte, California Strategies, LLC *(via email)*  
Mr. John Withers, California Strategies, LLC *(via email)*  
Jeffrey S. Haber, Esq., Paul Hastings *(via email)*  
Mr. Michael Nytzen, Paul Hastings *(via email)*  
Lana H. Sammons, Esq. *(via email)*

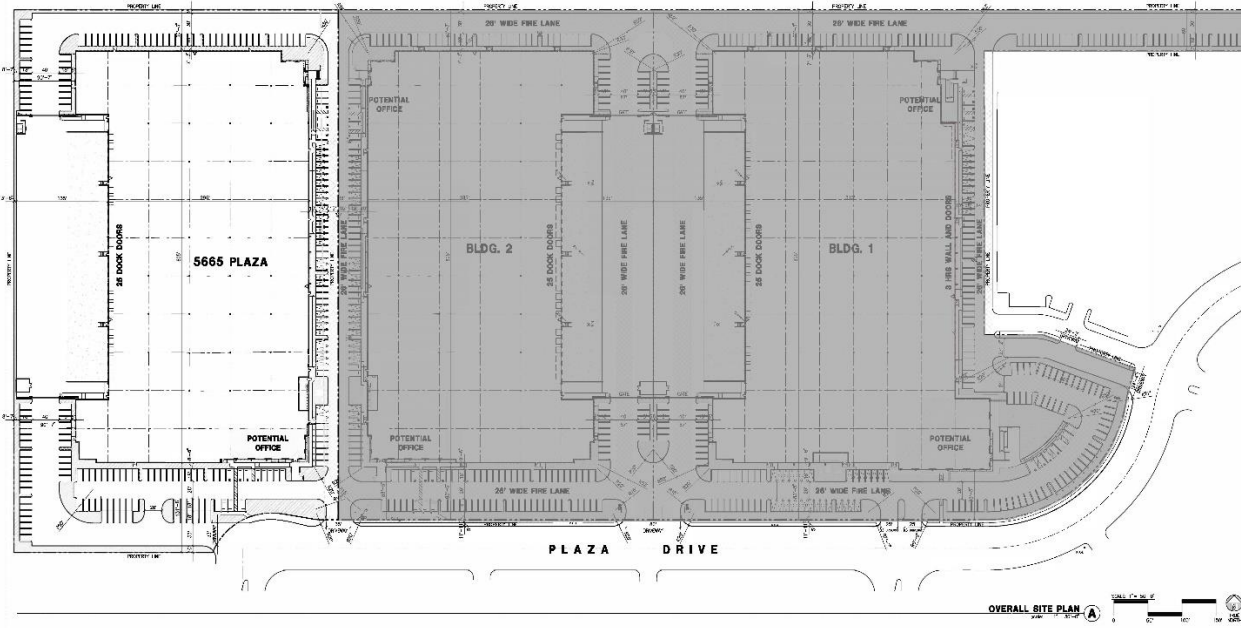


Schedule 1

Site Plans (from March 7 letter)



# Schedule 2 Cumulative Site Plan



**PROPERTY OWNER**  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC

**ADDRESS OF THE PROPERTY**  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC

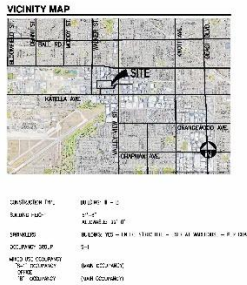
**ASSESSOR'S PARCEL NUMBER**  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC

**LEGAL DESCRIPTION**  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC

- SITE PLAN GENERAL NOTES**
1. ALL WORK SHALL CONFORM WITH ALL APPLICABLE ORDINANCES.
  2. THE OWNER SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS.
  3. ALL UTILITIES SHALL BE DEEPER THAN THE FINISHED GRADE.
  4. ALL UTILITIES SHALL BE DEEPER THAN THE FINISHED GRADE.
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  20. ALL UTILITIES SHALL BE DEEPER THAN THE FINISHED GRADE.

**PROJECT DATA**

ITEM	DESCRIPTION	DATE
1	PRELIMINARY	10/15/2024
2	FINAL	11/15/2024
3	REVISION	12/15/2024
4	REVISION	01/15/2025
5	REVISION	02/15/2025
6	REVISION	03/15/2025
7	REVISION	04/15/2025
8	REVISION	05/15/2025
9	REVISION	06/15/2025
10	REVISION	07/15/2025
11	REVISION	08/15/2025
12	REVISION	09/15/2025
13	REVISION	10/15/2025
14	REVISION	11/15/2025
15	REVISION	12/15/2025
16	REVISION	01/15/2026
17	REVISION	02/15/2026
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99	REVISION	12/15/2032
100	REVISION	01/15/2033



**ZONING ORDINANCE FOR CITY**  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC

**APPLICANT**  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC

**APPLICANT'S REPRESENTATIVE**  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC  
 5665 PLAZA, LLC

- SITE PLAN GENERAL NOTES**
- 1. ALL UTILITIES SHALL BE DEEPER THAN THE FINISHED GRADE.
  - 2. ALL UTILITIES SHALL BE DEEPER THAN THE FINISHED GRADE.
  - 3. ALL UTILITIES SHALL BE DEEPER THAN THE FINISHED GRADE.
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  - 19. ALL UTILITIES SHALL BE DEEPER THAN THE FINISHED GRADE.
  - 20. ALL UTILITIES SHALL BE DEEPER THAN THE FINISHED GRADE.

**OFFICIAL USE ONLY**

700, NC  
 1001 North Carolina Ave. Ste. 200  
 RDU, NC  
 919-485-1170  
 919-485-1171  
 919-485-1172

City of Raleigh  
 Planning and Zoning Department

Owner:  
**Goodman**

Project:  
**5665 PLAZA DRIVE  
 EXPRESS GARAGE**

Consultants:  
**O-DAB-A1.0**

Title: **MARKET SITE PLAN**

Project Number: **21-08**  
 Drawn by: **AWM**  
 Date: **2/6/25**  
 Revision:

Scale:

**O-DAB-A1.0**



Allyssa J. Holcomb

Direct Dial No.

(714) 384-4313

Email Address

aholcomb@garrettllp.com

March 7, 2024

**VIA EMAIL** ([cityclerk@cypressca.org](mailto:cityclerk@cypressca.org))

City Council of the City of Cypress  
c/o City Clerk for the City of Cypress  
5275 Orange Avenue  
Cypress, CA 90630

**Re: Warland Investments Company and Affiliated Entities' Comments on Initial Study/MND for Goodman Commerce Center Expansion - 5665 Plaza Drive, Cypress, California; Cal. Code Regs. Tit. 14, §§ 15073 and 15105**


Dear City Council Members:

This firm represents Warland Investments Company and affiliated entities (collectively, “**Warland**”), which is one of the largest landowners in the City of Cypress (“**City**”). Warland’s local holdings consist of approximately 3.5 million square feet of space within the Cypress Business Park (“**Park**”), which makes Warland the largest landowner within the Park by a significant margin. Warland maintains its long-standing investments in the City and feels strongly about bringing more high-quality businesses and jobs into the community of Cypress.

The City recently prepared an Initial Study (“**Initial Study**”) and draft Mitigated Negative Declaration (“**MND**” and, collectively with the Initial Study, “**IS/MND**”) in connection with the proposed redevelopment of 5665 Plaza Drive. This “**Goodman Commerce Center**” redevelopment project, initiated by GLC Cypress LLC (“**Goodman**”), consists of one (1) new primarily industrial facility located at 5665 Plaza Drive and a shared driveway with the two (2) new primarily industrial facilities under construction at 5757 Plaza Drive (the redevelopment of 5665 Plaza and 5757 Plaza is collectively referred to herein as “**Goodman Commerce Center**”). Additionally, the IS/MND indicates that the City proposes to amend the McDonnell Specific Plan to allow light industrial uses within the eastern portion of Planning Area 1 and to increase the maximum allowable square footage of Planning Area 1 of the Specific Plan.

Warland is an interested party by virtue of owning over two dozen properties located within a mile of Goodman Commerce Center, a number of which are located (a) within a ¼ mile of Goodman Commerce Center, and (b) at intersections located on Katella Avenue and Valley View Drive, which will be heavily impacted by truck traffic entering and exiting Goodman Commerce Center due to proximity to the project. Warland’s numerous holdings in Cypress are depicted and described in [Schedule 1](#) and [Schedule 2](#) attached hereto. In that capacity, Warland offers the comments below in response to the IS/MND for 5665 Plaza Drive dated February 2024.

While Warland has not had the opportunity to review in detail the materials submitted in connection with the IS/MND, Warland has significant concerns regarding the short and long-term impacts to air quality, traffic and noise in the Park and surrounding areas due to the proposed redevelopment of

 (714) 384-4300

 [www.garrettllp.com](http://www.garrettllp.com)

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Address: 3200 Bristol Street, Suite 850, Costa Mesa, CA 92626

5665 Plaza Drive, particularly when these impacts are viewed cumulatively with the redevelopment of 5757 Plaza Drive (i.e., the entire Goodman Commerce Center). This letter outlines some of the high-level issues that Warland has noticed; however, please be aware that Warland expects to have additional comments.

Furthermore, it is clear to Warland that the City failed to prepare a thorough Initial Study and review the whole record in connection with Goodman Commerce Center, and as such, the City egregiously failed to satisfy CEQA, including, without limitation, by piecemealing multiple projects to avoid the preparation of an environmental impact report (“EIR”). This abuse of discretion by the City must be corrected through the preparation of a complete EIR of the entire Goodman Commerce Center, including an analysis of the proposed amendments to the McDonnell Specific Plan, and the implementation of a new CEQA review and comment period. A full analysis of the project as a whole, as CEQA requires, may identify impacts that need to be mitigated, or may not be able to be mitigated to a less than significant level.

A. **PROJECT SUMMARY**

On September 15, 2021, Goodman acquired 5665 Plaza Drive and 5757 Plaza Drive from the same party as a part of the same transaction. A copy of the Grant Deed is attached hereto as Schedule 3.

On September 17, 2021, the City approached Warland regarding the “Specific Plan Modernization” project, which was intended to replace all of the Specific Plans within the Park with a single Specific Plan.

On March 2, 2023, the City advised Warland of the proposed “Goodman Commerce Center” redevelopment of 5757 Plaza Drive (hereinafter, “**5757 Redevelopment**”) by Goodman. Warland advised the City of certain concerns regarding the 5757 Redevelopment, including, without limitation, that the traffic study prepared by LSA Associates (“**LSA**”) conducted as part of the CEQA process inaccurately stated that truck traffic generated from the property would be *reduced* by the 5757 Redevelopment, even though the 5757 Redevelopment would (i) increase warehouse space by 50% and truck doors by 67%, and (ii) applied assumed land use codes associated with a heavier truck use than the then-existing use of the property, which together would unquestionably *increase* the truck traffic generated from the property. While the traffic study was then revised, such revised traffic study was not published until after the CEQA public review period (i.e., February 3-27, 2023) had expired. In addition, prior to the April 10, 2023 City Council meeting to approve the 5757 Redevelopment, Warland requested, in writing, that the City Council condition its approval of the 5757 Redevelopment on (1) a new traffic study being prepared by an independent third party; (2) a designated heavy truck route being routed via Katella Avenue to the 605 freeway to minimize the impacts of truck traffic on the three (3) office buildings located at the Plaza Drive and Valley View intersection, as well as the residential areas located off of Valley View; and (3) 3 L (i.e., third party logistics) uses being restricted. However, the City Council rejected Warland’s mitigation requests and approved the 5757 Redevelopment in a 3-2 vote.

Less than four (4) months later, on August 2, 2023, the City advised Warland of a proposed “warehouse development” project at 5665 Plaza Drive by Goodman. The City did not indicate that the 5665 Plaza Drive redevelopment project (hereinafter, “**5665 Redevelopment**”) was related to the 5757 Redevelopment (i.e., what was then known as “Goodman Commerce Center”), nor did the City provide any explanation for why these applications were submitted separately.

The City approved a task order for LSA to prepare an environmental IS/MND for the 5665 Redevelopment. As an initial matter, the purpose of an Initial Study is to determine whether a Negative Declaration (“ND”), an MND or an EIR is appropriate for a specific project. The fact that the

City tasked LSA with preparing an Initial Study and MND concurrently indicates the City had predetermined that it would require an MND, which violates 14 CCR § 15063 and is inconsistent with CEQA. Neither the Planning Director's report recommending such approval nor the LSA task order indicated any connection between the 5665 Redevelopment and the 5757 Redevelopment.<sup>1</sup> On September 11, 2023, Warland delivered a letter to City Council stating that (1) 5665 Plaza Drive is located directly adjacent to 5757 Plaza Drive, (2) the parcels were acquired by Goodman on the same day as a part of the same transaction, and (3) per CEQA guidelines, the environmental studies for the 5665 Redevelopment must evaluate the cumulative impacts of the 5665 Redevelopment together with the 5757 Redevelopment. The City did not respond to Warland's letter; however, the letter was indirectly acknowledged via the City's website, which: (a) named the 5665 Redevelopment as "Goodman Commerce Center – Expansion", and (b) identified the building to be constructed in connection with the 5757 Redevelopment as "Building 3" (see attached [Schedule 6](#); see also attached [Schedule 7](#), which depicts the site plan for the 5757 Redevelopment, which labels the two (2) buildings to be constructed as "Building 1" and "Building 2", respectively).

Per the City's current 6-month strategic plan (a partial copy of which is attached as [Schedule 8](#)), the Planning Director intended to propose the Specific Plan modernization plan to City Council at the February 28, 2024 City Council workshop.

## **B. FAILURE TO COMPLY WITH CEQA**

The City failed to meet its requirements as a lead agency under CEQA because it failed to fairly conduct an Initial Study in advance of determining whether an ND, an MND or an EIR is necessary. Instead, it predetermined (i.e., prior to conducting the Initial Study) that it was going to approve the 5665 Redevelopment with an MND. Further, the City failed to evaluate the actual cumulative impact of the entire Goodman Commerce Center (i.e., 5665 Plaza Drive and 5757 Plaza Drive) since it failed to (a) adequately define, and improperly piecemealed, the project; and (b) consider the foreseeable potential use of Goodman Commerce Center as a logistics center. The City further failed to satisfy CEQA's requirements by failing to prepare an EIR that accurately evaluates the cumulative impact of the entire Goodman Commerce Center (i.e., 5665 Plaza Drive and 5757 Plaza Drive), and failing to analyze the impacts of the proposed amendments to the McDonnell Specific Plan and/or the proposed "modernized" Specific Plan, which would ostensibly replace it.

### **1. Failure to Conduct a Thorough Initial Study and Require an EIR**

As the lead agency for Goodman Commerce Center, the City is solely responsible for complying with CEQA and cannot rely on comments from other public agencies or private citizens as a substitute for its required diligence under CEQA.<sup>2</sup> In its review of a project proposal, the lead agency must ensure that it receives a complete application and, while conducting its review for completeness, the agency must be alert for "environmental issues that might require preparation of an EIR or that may require additional explanation by the applicant".<sup>3</sup> Any Initial Study must (a) consider all phases of project planning, implementation, and operation, and (b) contain a description of the project.<sup>4</sup> Two key purposes of an Initial Study are to "(1) Provide the lead agency with information to use as the basis for deciding whether

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<sup>1</sup> The Planning Director's report to City Council and the LSA task order are available on the City's website at [Planning Director Report \(8/28/2023\)](#) and [LSA Task Order](#). The Planning Director's report and the first page of the LSA task order are attached for reference as [Schedule 4](#) and [Schedule 5](#), respectively.

<sup>2</sup> Cal. Code Regs. tit. 14, § 15020.

<sup>3</sup> Cal. Code Regs. tit. 14, § 15060.

<sup>4</sup> Cal. Code Regs. tit. 14, § 15063.

to prepare an EIR or negative declaration” and “(2) Enable an applicant or lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a negative declaration.”<sup>5</sup> Unless, based on the Initial Study, there is no substantial evidence of a significant environmental impact, in light of the whole record before a lead agency, the agency *must* prepare an EIR.<sup>6</sup> An MND is only appropriate when:

“(1) [R]evisions to the project plans or proposals made by or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and (2) There is no substantial evidence, *in light of the whole record before the agency*, that the project as revised may have a significant effect on the environment.”<sup>7</sup> (*emphasis added*)

The City requested LSA prepare an MND at the same time it asked LSA to prepare the Initial Study for the 5665 Redevelopment. It is therefore clear that the City never intended to use the Initial Study as required by CEQA, but instead predetermined that it would approve the 5665 Redevelopment with an MND regardless of the results of the Initial Study. In engaging in such a predetermination and failing to even consider the Initial Study’s evaluation of a project’s impacts of the on the environment, the City failed to comply with CEQA.

The City knew or should have known that Goodman intended to redevelop 5665 Plaza Drive and 5757 Plaza Drive as a cohesive project since (a) Goodman acquired both parcels on the same day as a part of the same transaction, and (b) the site plans for 5665 Plaza Drive and 5757 Plaza Drive published by the City identify the sites collectively as “Goodman Commerce Center” and the buildings located thereon as “Building 1”, “Building 2” (each of which appeared on the site plans for 5757 Plaza Drive) and “Building 3”(which appeared on the site plans for 5665 Plaza Drive).<sup>8</sup> Also, the City approved the 5757 Redevelopment in April 2023, and then, less than four (4) months later, Goodman proposed a similar redevelopment project on the immediately adjacent parcel. Even assuming the City was unaware of the site plan for 5665 Plaza Drive when it approved the 5757 Redevelopment (unlikely, but assuming for present purposes), the City was quickly made aware of the much larger project (*i.e.*, the entire “Goodman Commerce Center”) upon receipt of the application to redevelop 5665 Plaza Drive. Further, Goodman is a global real estate developer who specializes in the development of logistics centers, and the design of the warehouses proposed to be constructed within Goodman Commerce Center mirrors other Goodman logistics centers constructed in the State of California (see attached Schedule 9). Finally, the City received both public and private comments in connection with the projects alerting the City to the issues herein. Therefore, the City knew or should have known of the potential use of the entire Goodman Commerce Center as a logistics center.

Notwithstanding the overwhelming evidence of Goodman’s plans with respect to the Goodman Commerce Center, the City approved the LSA task order for the Initial Study of the 5665 Redevelopment as a standalone project, blatantly removing a clearly related project and associated impacts from the scope of the Initial Study, resulting in an improperly narrow record. Put another way, the City failed to consider the full scope of Goodman Commerce Center projects in the Initial Study because it improperly piecemealed the redevelopments of 5665 Plaza Drive and 5757 Plaza Drive. The City similarly failed to consider the foreseeable use of Goodman Commerce Center as a logistics center

<sup>5</sup> Cal. Code Regs. tit. 14, §§ 15063(c)(1) and 15063(c)(2).

<sup>6</sup> Cal. Code Regs. tit. 14, § 15064.

<sup>7</sup> Cal. Code Regs. tit. 14, § 15070(b).

<sup>8</sup> See Schedule 7.

(each such point is further discussed under paragraphs B.2 and B.3 below). The City is responsible for fairly evaluating the potential environmental impacts of projects within the City limits, as well as for reviewing, understanding, and presenting to the public the environmental effects of Goodman Commerce Center. The City's improper conduct of the Initial Study process means the City prevented itself from determining whether an EIR was required under CEQA. As such, the City erred in preparing the Initial Study and MND simultaneously for the 5665 Redevelopment and abused its discretion by failing to perform its duty as a lead agency under CEQA.

## 2. Failure to Properly Define "Project" and Improper Piecemealing

CEQA defines a "project" as "the whole of an action" which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that involves an activity that requires a governmental agency's entitlement.<sup>9</sup> Interpreting CEQA broadly, as intended by the California Legislature, the "project" to be evaluated by the City should have included: (i) the 5757 Redevelopment, (ii) the 5665 Redevelopment, and (iii) the potential use of Goodman Commerce Center as a logistics center.

Submerging the cumulative environmental impact of a complete project by "chopping" it into pieces and presenting mutually exclusive environmental documents can prevent a detailed EIR from being generated, leaving the public uninformed of the actual environmental impacts of a project. Improperly piecemealing a project is dangerous because the separate pieces may each have less-than-significant environmental impacts, but the overall project could present very significant, even disastrous, environmental impacts.<sup>10</sup> Here, that danger was realized because the City, in viewing Goodman Commerce Center in separate parts, each entirely distinct from the other, did not evaluate the full, cumulative impact of the planned Goodman Commerce Center, which, had it been evaluated as required by CEQA, would have resulted in a further requirement to prepare an EIR.

## 3. Failure to Consider Foreseeable Potential Use as a Logistics Center

Environmental studies prepared by a lead agency in connection with a redevelopment are intended to evaluate "past, present, and reasonably anticipated future" uses.<sup>11</sup> Further, such reasonably anticipated future uses do not have to be permitted under current zoning regulations or otherwise formally approved by the deciding body to be evaluated as a potential future use.<sup>12</sup> The design of the buildings intended to be constructed at Goodman Commerce Center mirrors the design of buildings at other logistics centers developed by Goodman in California.<sup>13</sup> In addition, the majority of Goodman's projects in California are logistics center (see attached Schedule 10). While Goodman's logistics centers average approximately 600,000 square feet, its non-logistics projects are considerably smaller, averaging approximately 95,000 square feet. The entire Goodman Commerce Center will consist of approximately 581,662 square feet, which is consistent with typical Goodman logistic center projects in California. Further, Goodman's non-logistics projects each have less than 10 dock doors, while the entire Goodman Commerce Center is projected to have 75 dock doors (again, consistent with other Goodman logistics centers). Based on these facts, it is clear that the intent is to use Goodman Commerce Center as a logistics center. Unlike typical warehouses, logistics centers operate as distribution centers, with an extremely high volume of trucks traveling short distances and constantly loading and unloading product. Large logistics

<sup>9</sup> Cal. Code Regs. tit. 14, § 15378.

<sup>10</sup> Citizens Ass'n for Sensible Dev. of Bishop Area v. Cty. of Inyo, 172 Cal. App. 3d 151, 165 (1985).

<sup>11</sup> Cal. Code Regs. tit. 14, § 15130.

<sup>12</sup> Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal., 47 Cal. 3d 376, 394 (1988).

<sup>13</sup> See attached Schedule 9.

centers can generate significant noise, congest local streets, contribute to excessive air pollution and potentially lower property values in the surrounding areas. Because the City is primarily residential, with some light industrial and office buildings located within the park, a logistics center could completely change the aesthetics, appeal and property values of the City.

While Goodman Commerce Center's foreseeable potential use as a logistics center is currently not permitted under the McDonnell Center Specific Plan, per the Specific Plan Modernization project, Goodman Commerce Center is intended to be subject to a new Specific Plan that anticipates the Planning Director having broad discretionary approvals with respect to the use of the properties subject to such Specific Plan. As such, the City cannot rely on current permitted uses, or even those uses expressly permitted under the proposed modernized Specific Plan, in limiting the scope of its evaluation of the environmental impact of a project.

For the reasons set forth above, Goodman Commerce Center being used as a logistics center, which would likely involve an extremely high volume of trucks traveling throughout the Park, is reasonably foreseeable and CEQA requires that such a reasonably foreseeable use be taken into account for purposes of the environmental studies ordered by the City in connection with the 5665 Redevelopment. Taking into account that the 5665 Redevelopment is inextricably linked to the 5757 Redevelopment located next door, the City's failure to require an EIR to evaluate the entire Goodman Commerce Center runs afoul of CEQA. The same is true of the City's environmental evaluation of the 5757 Redevelopment. Although it was ultimately approved by the City Council, the MND prepared for 5757 Plaza Drive was grossly inadequate for purposes of evaluating the potential impact of the proposed project. The City should not exacerbate such failure by declining to require an EIR for the 5665 Redevelopment that evaluates the entire Goodman Commerce Center.

**4. Failure to Analyze the Impacts of the Proposed Amendments to the McDonnell Specific Plan**

The IS/MND indicates that the 5665 Redevelopment will require an amendment to the McDonnell Specific Plan to allow light industrial uses within the eastern portion of Planning Area 1 and an increase in the maximum allowable square footage of Planning Area 1. However, the IS/MND fails to include a description of the type and nature of these light industrial uses, as well as an analysis of the impacts resulting from such uses. And, while the Project Description section of the IS/MND indicates that the light industrial uses will be limited to the eastern portion of Planning Area 1, the Land Use and Planning section of the IS/MND states that the amendment would allow industrial uses within all of Planning Area 1. The IS/MND also fails to include any information concerning the amount of additional square footage proposed to be added to Planning Area 1, and fails to analyze the impacts of such additional square footage.

**C. OBJECTIONS TO CONCLUSIONS OF MND FOR THE 5665 PLAZA DRIVE REDEVELOPMENT**

Even assuming, for present purposes, that the City did properly conduct and evaluate the Initial Study, the results of the MND, which treats the 5665 Redevelopment as a standalone project, are contradictory, inaccurate and/or based on false assumptions, and as such are not reliable for purposes of evaluating the actual impact of the project.



1. **Goodman Commerce Center Traffic Analysis dated January 11, 2024, prepared by Urban Crossroads under Reference No. 15593-05 TA Report for 5665 Plaza Drive (“Traffic Analysis”)**

a. Truck Distribution Map

Per the Traffic Analysis, there is one (1) existing driveway providing ingress/egress to and from 5665 Plaza Drive to a public right-of-way (i.e., Plaza Drive), which is identified in the Traffic Analysis as “**Driveway 1**”. The Traffic Analysis recommends the construction of a 25’ curb radius modification to the shared driveway between 5665 Plaza Drive and 5757 Plaza Drive, which will “accommodate the egress of heavy trucks” to Plaza Drive (“**Driveway 2**”).

The anticipated distribution of the truck traffic to be generated by 5665 Plaza Drive is depicted in “Exhibit 4-1” (Project (Truck) Trip Distribution) (“**Truck Distribution Map**”) attached to the Traffic Analysis, a copy of which is attached as Schedule 11. The Truck Distribution Map is incomplete, inaccurate and/or misleading in a number of respects, as follows:

i. It accounts for truck traffic anticipated to be generated by the 5665 Redevelopment but fails to account for trucks generated by the remainder of Goodman Commerce Center (i.e., 5757 Plaza Drive), which may exit via Driveway 1 and/or Driveway 2.

ii. It assumes that 100% of the truck traffic generated by the 5665 Redevelopment will exit via Driveway 1, which fails to take into consideration the fact that truck traffic generated by the 5665 Redevelopment may utilize (a) Driveway 2, or (b) any of the three (3) driveways located solely on the remainder of Goodman Commerce Center.

iii. It contemplates that 80% of such truck traffic will exit 5665 Plaza Drive via Douglas Drive to Katella Avenue, and will then travel in the following directions: (a) 50% will travel west on Katella Avenue to the 605, and (b) 30% will travel east on Katella Avenue towards Valley View; *however*, it does not depict, nor does the Traffic Analysis address, what is anticipated to occur once the 30% of trucks travelling east arrive at the intersection of Katella Avenue and Valley View. Rather, the truck traffic appears to simply stop in the middle of Katella Avenue before reaching the intersection. As such, the Traffic Analysis does not disclose the total number of trucks anticipated to travel either north or south on Valley View towards the nearby residential areas.<sup>14</sup>

iv. It contemplates that the remaining 20% of truck traffic will exit 5665 Plaza Drive and travel east on Plaza Drive towards Valley View, and that the entire 20% of truck traffic will turn left (i.e., north) on Valley View. In other words, the Traffic Analysis inexplicably assumes that *no* truck traffic generated by the 5665 Redevelopment will travel south on Valley View (i.e., into a large residential area).

In light of the issues identified in subsections (i) – (iv) above, the Truck Distribution Map is missing critical information that CEQA requires the environmental studies assess and communicate to residents and business owners. Most critically, the Truck Distribution Map completely obscures the total amount of truck traffic that the residences located north and south on Valley View will be subjected to as a result of the 5665 Redevelopment. This is a clear violation of CEQA.<sup>15</sup>

<sup>14</sup> The corresponding exhibit in the Traffic Analysis for 5757 Plaza Drive (i.e., Exhibit 4-1) does not omit the same information. See Schedule 11.

<sup>15</sup> Cal. Code Regs. tit. 14, § 15147.

b. Daily Truck Trips

The Traffic Analysis contemplates 342 additional daily PCE<sup>16</sup> truck trips being generated by the 5665 Redevelopment; however, because it (a) evaluates the additional daily truck trips generated by the 5665 Redevelopment as a standalone project rather than a part of entire Goodman Commerce Center, and (b) fails to contemplate the reasonably foreseeable use of the facilities within Goodman Commerce Center as a logistics center, the truck traffic count is inaccurate and likely *significantly* underestimates the number of truck trips to be generated by Goodman Commerce Center.

2. **Section 4.3 – Air Quality**

a. Analysis Fails to Address Impact of Refrigerated Trucks

The MND contemplates high cube refrigerated storage, which will require the use of refrigerated trucks. Refrigerated trucks are considered heavily polluting vehicles due to their weight<sup>17</sup> and the fact that, without sufficient electric hookups, their motors cannot be turned off without potential spoilage to their cargo. Further, a refrigerated truck running 8,000 hours per week can cause potential cancer risk for nearly 1,800 people per million living close to cold-storage warehouses.<sup>18</sup> These issues increase potential impacts to air quality that are specific to the use of refrigerated trucks; however, the MND does not consider such impacts in its conclusions related to air quality. As such, the conclusions of the MND are incomplete, inaccurate and cannot be relied upon.

b. Analysis Fails to Evaluate Off-Site Impacts

The localized air quality impacts analysis in the MND only includes on-site sources.<sup>19</sup> CEQA requires the evaluation of all significant environmental effects related to a project, including off-site impacts if they are reasonably foreseeable.<sup>20</sup> Given the location of Goodman Commerce Center in the center of the Park, and less than a half mile from highly populated residential areas (including at least one public elementary school)<sup>21</sup>, as well as the foreseeable use of the project as a logistics center, off-site impacts of the project (in particular, related to the substantially increased truck traffic) are reasonably foreseeable. As such, the MND should have analyzed the air quality impact of the off-site vehicle trips (including truck trips), but it failed to do so, so the conclusions of the MND are incomplete, inaccurate and/or cannot be relied upon.

c. Cumulative Effects

The MND recognizes that vehicle trips associated with the proposed project will contribute to traffic congestion within the intersections and along the roadway segments nearby, which increases the carbon monoxide pollution in these areas. As a general matter, redevelopment projects require an evaluation of study area intersections or roadway segment levels of service if the proposed project is

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<sup>16</sup> “PCE” means “passenger car equivalent”. In a traffic study, PCE is used to convert the impact of a vehicle, such as a truck, into the equivalent of a passenger car on traffic flow.

<sup>17</sup> Refrigerated trucks typically weigh 43,000 – 45,000 lbs (<https://www.atsinc.com/blog/legal-axle-weight-limits-commercial-trucks-explained>)

<sup>18</sup> [Health Analyses \(ca.gov\)](https://www.health.ca.gov)

<sup>19</sup> Page 4.3-10 of the MND.

<sup>20</sup> Cal. Code Regs. tit. 14, § 15130.

<sup>21</sup> The location of Goodman Commerce Center and the areas surrounding it are depicted in attached [Schedule 1](#).

anticipated to generate 100 or more AM or PM peak trips.<sup>22</sup> The 5665 Redevelopment, as a standalone project, does not meet the criteria for the carbon monoxide evaluation at the roadway segment levels of service, so the MND concludes that the additional traffic resulting from the 5665 Redevelopment alone will not create a significant adverse impact – *however*, the MND does not consider the cumulative impact of the entire Goodman Commerce Center, nor the impact of the foreseeable use of the project for logistics purposes. Because those cumulative impacts were not taken into consideration, the threshold for triggering a more detailed evaluation of the carbon monoxide pollution was not met and the resulting conclusions in the MND are likely incomplete, inaccurate and cannot be relied upon.

### 3. Section 4.8 – Greenhouse Gas (“GHG”) Emissions

As an initial matter, the analysis in the MND regarding GHG emissions relies on the trip generation estimates set forth in the Traffic Analysis, which are incomplete, inaccurate and cannot be relied upon. As such, the conclusions regarding the GHG emissions in the MND are also incomplete, inaccurate, and cannot be relied upon. In any event, there are several issues with the conclusions of the MND related to GHG emissions as described below.

#### a. Results Fail to Meet “Less than Significant” Emissions

Per the MND, the SCAQMD has determined that a project will have “less than significant” GHG emissions if it will result in operational-related GHG emissions of less than 3,000 MT CO<sub>2</sub>e per year.<sup>23</sup> The MND further states the 5665 Redevelopment is anticipated to result in 3,191.6 MT CO<sub>2</sub>e per year, which number *exceeds* the SCAQMD threshold, as specified in the MND. The MND then incorrectly concludes that there is a less than significant impact because the net increase of such GHG emissions is 2,532.1 MT CO<sub>2</sub>e per year (i.e., less than the 3,000 threshold). The SCAQMD threshold utilized in the MND is based on *total* GHG emissions, not the net increase, so the MND should have included a more detailed review of GHG emissions in accordance with the SCAQMD thresholds referenced in the MND.

#### b. Analysis Fails to Evaluate Off-Site Impacts

The analysis also fails to clearly evaluate the effects of off-site GHG emissions. As stated above, CEQA requires the evaluation of all significant environmental effects related to a project, including off-site impacts that are reasonably foreseeable.<sup>24</sup> Given the location of Goodman Commerce Center in the center of the Park (and less than a half mile from highly populated residential areas, including at least one public elementary school), as well as the foreseeable use of the project as a logistics center, the off-site impacts of GHG emissions are reasonably foreseeable. As such, the MND should have analyzed the impact of the off-site GHG emissions.

#### c. Conclusions Based on Inaccurate Assumptions

Per our comments above, the MND was prepared assuming that the 5665 Redevelopment is separate from the 5757 Redevelopment (i.e., it improperly piecemeals the entire Goodman Commerce Center), and it does not contemplate the use of Goodman Commerce Center for logistics purposes. Because those assumptions were inaccurate, the conclusions are also inaccurate.

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<sup>22</sup> Page 4.3-9 of the MND.

<sup>23</sup> Page 4.8-4 of the 5665 Plaza Drive MND.

<sup>24</sup> Cal. Code Regs. tit. 14, § 15130.

4. **Section 4.9 – Hazards and Hazardous Materials**

Section 4.9(b) of the MND analyzes whether the project will 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. It concluded there would be a less than significant impact with mitigation incorporated. However, the MND failed to provide a single recommended mitigation measure, and further concluded that no mitigation was required.<sup>25</sup> The MND therefore failed to eliminate significant impacts on the environment and CEQA requires that in such cases an EIR must be prepared.

5. **General Failure to Adequately Evaluate Cumulative Impacts**

The conclusions made in the MND are based on comparing the proposed project (*i.e.*, the 5665 Redevelopment, which contemplates the construction of a 191,394-square-foot industrial warehouse building) to the existing office building. The analysis should instead draw conclusions based on the cumulative impact of Goodman Commerce Center (*i.e.*, 581,662-square-foot logistics facilities) and not simply the variance between the existing office building and a single proposed warehouse building located at 5665 Plaza Drive. The pervasive failure of the MND to evaluate these cumulative impacts falls well short of CEQA's mandate.

Further, the cumulative development tables identified as Tables 4-5 and 4-6 in the Traffic Analysis, which tables are attached hereto as Schedule 12, note the cumulative impact of the 5665 Redevelopment and other nearby developments, but (i) the cumulative impact analysis does *not* identify the cumulative *truck* traffic (let alone refrigerated trucks), and (ii) despite the majority of the parcels neighboring 5665 Plaza Drive being used for industrial purposes, the tables largely contemplate the cumulative effects of the 5665 Redevelopment together with residential, office, hotel and retail projects. The only industrial project identified is 5757 Plaza Drive (*i.e.*, the remainder of Goodman Commerce Center). In any event, evaluating only the cumulative number of total vehicles generated by Goodman Commerce Center rather than the cumulative environmental impacts generated Goodman Commerce Center falls considerably short of the requirements of CEQA.

D. **PROPOSED MITIGATION MEASURES**

Neighboring commercial and residential owners are entitled to clear, accurate and unambiguous information regarding the actual environmental effects of the proposed Goodman Commerce Center (*i.e.*, 5665 Plaza Drive and 5757 Plaza Drive), including, without limitation, the amount and effect of the truck traffic (including refrigerated truck traffic) to be generated thereby, including if the same is used as a logistics center as designed.<sup>26</sup> These parcels are located in the center of the Park, which is otherwise used for light industrial and office; without an accurate environmental impact report, it is difficult to know what mitigation would be appropriate to address the additional congestion, noise and air pollution that will likely result from the operation of the planned 581,662-square-foot logistics facilities. As an initial step, CEQA requires that the City base its determination of the project's potential environmental impacts on accurate reports. Warland has no doubt that properly prepared reports will determine that a full EIR must be completed that includes evaluation of the cumulative environmental impact of the entire Goodman Commerce Center and its likely use as a logistics center.

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<sup>25</sup> Page 4.9-3 of the 5665 Plaza Drive MND.

<sup>26</sup> Cal. Code Regs. tit. 14, § 15002.

A full analysis of the project as a whole, as CEQA requires, may identify impacts that need to be mitigated, or may not be able to be mitigated to a less than significant level.

Warland reserves all rights and remedies associated with Goodman Commerce Center, the MND, the Traffic Analysis and the analysis and conclusions presented therein.

Regards,



Allyssa J. Holcomb

Encs.

cc: Mayor Scott Minikus, City Council, City of Cypress *(via email)*  
Mayor Pro Tem Bonnie Peat, City Council, City of Cypress *(via email)*  
Council Member David Burke, City Council, City of Cypress *(via email)*  
Council Member Anne Mallari, City Council, City of Cypress *(via email)*  
Council Member Frances Marquez, Ph.D., City Council, City of Cypress *(via email)*  
Ms. Alicia Velasco, Planning Director, City of Cypress *(via email)*  
Mr. Peter Grant, City Manager, City of Cypress *(via email)*  
Mr. Carl W. Robertson, Jr., Warland Investments Company *(via email)*  
Ms. Hope Warschaw, Warland Investments Company *(via email)*  
Mr. Jim Brulte, California Strategies, LLC *(via email)*  
Mr. John Withers, California Strategies, LLC *(via email)*  
Mr. Michael Nytzen *(via email)*  
Jeffrey S. Haber, Esq. *(via email)*  
Lana H. Sammons, Esq. *(via email)*

**Schedule 1**

**Map of Cypress – Goodman Commerce Center**



## Schedule 2

### **Warland's Cypress Properties**

1. 10800 – 10850 Valley View, Cypress, CA
2. 10803 Hope Street, Cypress, CA
3. 6100 Chip Avenue, Cypress, CA
4. 10874 Hope Street, Cypress, CA
5. 10824 Hope Street, Cypress, CA
6. 6300 Gateway Drive, Cypress, CA
7. 6200 Gateway Drive, Cypress, CA
8. 10600 Valley View, Cypress, CA
9. 6101 Gateway Drive, Cypress, CA
10. 11411 Valley View, Cypress, CA
11. 10700 Valley View, Cypress, CA
12. 6100 Gateway Drive, Cypress, CA
13. 5560 Katella Avenue, Cypress, CA
14. 5700 Warland Drive, Cypress, CA
15. 11331 Valley View, Cypress, CA
16. 6261 Katella Avenue, Cypress, CA
17. 5900 Katella Avenue, Cypress, CA
18. 5660 Katella Avenue, Cypress, CA
19. 6251 Katella Avenue, Cypress, CA
20. 6021 Katella Avenue, Cypress, CA
21. 10900 Valley View, Cypress, CA
22. 6161-6181 Chip Avenue, Cypress, CA
23. Cypress Plaza Shopping Center, Cypress, CA
24. Warland Business Park, Cypress, CA
25. Gateway III, Cypress, CA
26. 6141 Katella Avenue, Cypress, CA
27. 5710, 5740, 5770 Warland Drive, Cypress, CA
28. 11137 Warland Drive, Cypress, CA
29. 11240 Warland Drive, Cypress, CA
30. 5730 Katella Avenue, Cypress, CA

**Schedule 3**

**Goodman Deed**

**CHICAGO TITLE COMPANY  
COMMERCIAL DIVISION**

RECORDING REQUESTED BY AND WHEN  
RECORDED RETURN TO:

Sherry Meyerhoff Hanson & Crance LLP  
520 Newport Center Drive, Suite 1400  
Newport Beach, CA 92660  
Attention: Kyle Bennion, Esq.

MAIL TAX STATEMENTS TO:

GLC Cypress LLC  
18201 Von Karman Avenue, Suite 1170  
Irvine, CA 92612  
Attn: Accounts Payable

00147713-993-SDC

Recorded in Official Records, Orange County  
Hugh Nguyen, Clerk-Recorder



45.00

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*(Space above this line for Recorder's use)*

The undersigned Grantor declares:

Documentary transfer tax is \$141,098.65

- Computed on full value of the interest or property conveyed, or
- Computed on full value less value of liens or encumbrances remaining at time of sale
- Unincorporated Area       City of Cypress

Parcel No.: : 241-101-25 and 241-101-26

**GRANT DEED**

FOR VALUABLE CONSIDERATION, receipt of which is hereby acknowledged, G&I IX CYPRESS CAMPUS LP, a Delaware limited partnership, hereby grants to GLC CYPRESS LLC, a Delaware limited liability company, the real property located in the City of Cypress, County of Orange, State of California, described on *Exhibit A* attached hereto and made a part hereof.

This Deed is made and accepted subject to:

- (i) general real estate taxes not yet due and payable;
- (ii) rights of parties in possession;
- (iii) all matters of record; and
- (iv) all matters that are discoverable by means of an accurate survey or inspection of the real property or by making inquiry of parties in possession.

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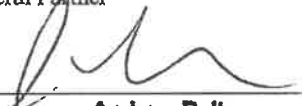
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Executed as of this 9 day of September 2021.

*GRANTOR:* G&I IX CYPRESS CAMPUS LP,  
a Delaware limited partnership

By: G&I IX Cypress Campus Partner LLC,  
a Delaware limited liability company  
its General Partner

By:   
Name: Andrew Peltz  
Title: Vice President

[Signature Page to Grant Deed]

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ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF New York )

) SS:

COUNTY OF New York )

On Oct. 9, 2021, before me, Susan Fattorusso, a Notary Public in and for said State, personally appeared Andrew Peltz, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of New York that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature: Susan Fattorusso (Seal)

SUSAN FATTORUSSO  
Notary Public, State of New York  
No. 01FA6021152  
Qualified in Kings County  
Commission Expires March 8, 2023

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GOVERNMENT CODE 27361.7

I CERTIFY UNDER PENALTY OF PERJURY THAT THE NOTARY SEAL ON THE DOCUMENT TO WHICH THIS STATEMENT IS ATTACHED READS AS FOLLOWS:

Name of the Notary: Susan Fattorusso

Commission Number: OLEA6021152 Date Commission Expires: 3-8-2023

County Where Bond is Filed: Kings County, STATE of New York

Manufacturer or Vendor Number: N/A  
(Located on both sides of the notary seal border)

Signature: [Handwritten Signature]  
Firm Name (if applicable)

Place of Execution: San Diego Date: 9/15/2021

EXHIBIT A

LEGAL DESCRIPTION

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF CYPRESS, IN THE COUNTY OF ORANGE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

PARCEL A: APN: 241-101-25

PARCEL 2, IN THE CITY OF CYPRESS, COUNTY OF ORANGE, STATE OF CALIFORNIA, AS SHOWN ON LOT LINE ADJUSTMENT NO. LL 2000-03 RECORDED AUGUST 30, 2000 AS INSTRUMENT NO. 200000453704, OFFICIAL RECORDS.

EXCEPTING FROM A PORTION OF SAID LAND ALL COAL, CHEMICALS, PETROLEUM, OIL, GAS, ASPHALTUM AND OTHER HYDROCARBONS AND ALL MINERALS, METALS AND MINERAL ORES, WHETHER SIMILAR TO THOSE HEREIN SPECIFIED OR NOT, OF EVERY KIND AND CHARACTER NOW KNOWN TO EXIST OR HEREAFTER DISCOVERED UPON, WITHIN OR UNDERLYING SAID LAND, TOGETHER WITH THE EXCLUSIVE AND PERPETUAL RIGHT OF THE GRANTEE, ITS SUCCESSORS AND ASSIGNS, OF INGRESS AND EGRESS BENEATH THE SURFACE OF SAID LAND TO EXPLORE FOR, EXTRACT, MINE AND REMOVE THE SAME AND TO MAKE SUCH USE OF SAID LAND BENEATH THE SURFACE AS IS NECESSARY OR USEFUL IN CONNECTION THEREWITH, WHICH USE MAY INCLUDE LATERAL OR SLANT DRILLING, DIGGING, BORING OR SINKING OF WELLS, SHAFTS, TUNNELS OR OTHER METHODS, TOGETHER WITH THE FUTURE EXCLUSIVE AND PERPETUAL RIGHT OF THE GRANTEE, ITS SUCCESSORS AND ASSIGNS, TO MAKE SUCH USE OF SAID LAND AS MAY BE NECESSARY TO STORE, KEEP, DEPOSIT AND/OR REMOVE ALL COAL, CHEMICALS, PETROLEUM, OIL, GAS, ASPHALTUM AND OTHER HYDROCARBONS AND ALL MINERALS, METALS AND MINERAL ORES, WHETHER SIMILAR TO THOSE HEREIN SPECIFIED OR NOT, OF EVERY KIND AND CHARACTER NOW KNOWN TO EXIST OR HEREAFTER DISCOVERED; PROVIDED, HOWEVER, THAT THE GRANTEE, ITS SUCCESSORS OR ASSIGNS, SHALL NOT USE THE SURFACE OF SAID LAND ABOVE A FIVE HUNDRED FOOT DEPTH IN THE EXERCISE OF ANY OF SAID RIGHTS AS GRANTED TO CONSOLIDATED PACIFIC INVESTMENT COMPANY, BY DEED RECORDED JANUARY 29, 1959, AS INSTRUMENT NO. 14208, IN BOOK 4567, PAGE 496, OFFICIAL RECORDS.

ALSO EXCEPTING FROM A PORTION OF SAID LAND, ALL MINERALS AND ALL MINERAL RIGHTS OF EVERY KIND AND CHARACTER NOW KNOWN TO EXIST OR HEREAFTER DISCOVERED UNDERLYING THE PROPERTY, INCLUDING, WITHOUT LIMITING THE GENERALITY OF THE FOREGOING, OIL AND GAS RIGHTS THERETO, TOGETHER WITH THE SOLE, EXCLUSIVE AND PERPETUAL RIGHT TO EXPLORE FOR, REMOVE AND DISPOSE OF SAID MINERALS BY ANY MEANS OR METHODS SUITABLE TO GRANTOR, ITS SUCCESSORS AND ASSIGNS, BUT WITHOUT ENTERING UPON OR USING THE SURFACE OF THE PROPERTY, AND IN SUCH

MANNER AS NOT TO DAMAGE THE SURFACE OF THE PROPERTY, OR TO INTERFERE WITH THE USE THEREOF AS EXCEPTED AND RESERVED BY UNION PACIFIC RAILROAD COMPANY IN DEED RECORDED JULY 28, 2000, AS INSTRUMENT NO. 20000396720, OF OFFICIAL RECORDS.

PARCEL B: APN: 241-101-26

PARCEL 3, IN THE CITY OF CYPRESS, COUNTY OF ORANGE, STATE OF CALIFORNIA, AS SHOWN ON LOT LINE ADJUSTMENT NO. LL 2000-03 RECORDED AUGUST 30, 2000 AS INSTRUMENT NO. 200000453704, OF OFFICIAL RECORDS.

EXCEPT THEREFROM A PORTION OF SAID LAND ALL COAL, CHEMICALS, PETROLEUM, OIL, GAS, ASPHALTUM AND OTHER HYDROCARBONS AND ALL MINERALS, METALS AND MINERAL ORES, WHETHER SIMILAR TO THOSE HEREIN SPECIFIED OR NOT, OF EVERY KIND AND CHARACTER NOW KNOWN TO EXIST OR HEREAFTER DISCOVERED UPON, WITHIN OR UNDERLYING SAID LAND, TOGETHER WITH THE EXCLUSIVE AND PERPETUAL RIGHT OF THE GRANTEE, ITS SUCCESSORS AND/OR ASSIGNS, OR INGRESS AND EGRESS BENEATH THE SURFACE OF SAID LAND TO EXPLORE FOR, EXTRACT, MINE AND REMOVE THE SAME AND TO MAKE SUCH USE OF SAID LAND BENEATH THE SURFACE AS IN NECESSARY OR USEFUL IN CONNECTION THEREWITH, WHICH USE MAY INCLUDE LATERAL OR SLANT DRILLING, DIGGING, BORING OR SINKING OF WELLS, SHAFTS, TUNNELS OR OTHER METHODS, TOGETHER WITH THE FURTHER EXCLUSIVE AND PERPETUAL RIGHT OF THE GRANTEE, ITS SUCCESSORS AND/OR ASSIGNS, TO MAKE SUCH USE OF SAID LAND AS MAY BE NECESSARY TO STORE, KEEP, DEPOSIT AND/OR REMOVE ALL COAL, CHEMICALS, PETROLEUM, OIL, GAS, ASPHALTUM AND OTHER HYDROCARBONS AND ALL MINERALS, METALS AND MINERAL ORES, WHETHER SIMILAR TO THOSE HEREIN SPECIFIED OR NOT OF EVERY KIND AND CHARACTER NOW KNOWN TO EXIST OR HEREAFTER DISCOVERED, PROVIDED, HOWEVER, THAT THE GRANTEE, ITS SUCCESSORS OR ASSIGNS, SHALL NOT USE THE SURFACE OF SAID LAND ABOVE A FIVE HUNDRED FOOT DEPTH IN THE EXERCISE OF ANY SAID RIGHTS AS GRANTED TO CONSOLIDATED PACIFIC INVESTMENT COMPANY, BY DEED RECORDED JANUARY 29, 1959 AS INSTRUMENT NO. 14208, IN BOOK 4567, PAGE 496, OF OFFICIAL RECORDS.

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PACIFIC RAILROAD COMPANY IN DEED RECORDED JULY 28, 2000 AS INSTRUMENT NO. 200000396720, OF OFFICIAL RECORDS.

PARCEL C:

A RIGHT-OF-WAY FOR PURPOSES OF INGRESS, EGRESS, DRIVEWAY AND INCIDENTAL PURPOSES OVER A PORTION OF PARCEL 3 OF PARCEL MAP 84-1113, IN THE CITY OF CYPRESS, COUNTY OF ORANGE, STATE OF CALIFORNIA, AS SHOWN ON A MAP FILED IN BOOK 191, PAGES 3 THROUGH 5 INCLUSIVE, OF PARCEL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY AS SET FORTH IN THAT CERTAIN GRANT OF RECIPROCAL EASEMENT AND MAINTENANCE AGREEMENT RECORDED FEBRUARY 11, 1986 AS INSTRUMENT NO. 86-057178, OF OFFICIAL RECORDS.

## Schedule 4

### Planning Director's City Council Report

8/29/23 8:17 PM

Print Agenda Item



## CITY OF CYPRESS CITY COUNCIL REPORT

City Council Regular

Item # 6.

FROM: Alicia Velasco, Planning Director

DATE: 08/28/2023

SUBJECT: **Approve a Task Order for an Environmental Initial Study/Mitigated Declaration for a Warehouse Development at 5665 Plaza Drive**

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#### RECOMMENDATION

Approve a \$65,100 task order with LSA for the preparation of an Environmental Initial Study/Mitigated Negative Declaration at 5665 Plaza Drive.

#### DISCUSSION

GLC Cypress LLC (Goodman Group) has applied to redevelop 5665 Plaza Drive. The proposal includes demolishing a vacant 150,000 square foot office building and constructing a new 190,000 square foot warehouse. The property is located in the McDonnell Center Specific Plan and was originally developed as an office for Mitsubishi.

An Initial Study/Mitigated Negative Declaration (IS/MND) is required to analyze the project for any potential environmental impacts and to determine applicable mitigation measures that could be included as conditions of approval. It is anticipated the entitlement application(s) and the IS/MND will be presented to the City Council in January 2024.

LSA is one of the City's on-call planning firms and has extensive experience in preparing this type of analysis; therefore, it is recommended LSA prepare the IS/MND. It is the City's practice to manage LSA's work while the applicant reimburses all associated costs.

#### BUDGET IMPACT

The applicant is required to deposit the cost of the task order with the City before the study is initiated. Unexpended amounts at the conclusion of the analysis (if any) will be refunded to the applicant. The applicant is also required to pay project application fees which offset City costs to administer the task order.

#### LEGAL REVIEW

None required.

[https://bestcityhosted.com/online\\_ag\\_memo.cfm?aeq=2170&rev\\_num=0&mode=External&re/oeq.ed#ruba&id=29773](https://bestcityhosted.com/online_ag_memo.cfm?aeq=2170&rev_num=0&mode=External&re/oeq.ed#ruba&id=29773)

1/2

8/29/23 8:17 PM

Print Agenda Item

**APPROVED** Peter Grant, City Manager  
**BY:**

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Attachments  
LSA Task Order  
Vicinity Map

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**Schedule 5**

**LSA Task Order (Cover Page Only)**



CARLSBAD  
CLOVIS  
IRVINE  
LOS ANGELES  
PALM SPRINGS  
POINT RICHMOND  
RIVERSIDE  
ROSEVILLE  
SAN LUIS OBISPO

July 31, 2023

Alicia Velasco  
Planning Director  
City of Cypress  
5275 Orange Avenue  
Cypress, CA 90630

Subject: Proposal for Completion of an Environmental Document and Technical Analysis for the 5665 Plaza Drive Warehouse Project

Dear Ms. Velasco:

LSA is pleased to respond to the City of Cypress (City) request for a proposal to prepare an environmental document and associated technical documentation for the proposed 5665 Plaza Drive Warehouse Project (project). The attached proposal is based on LSA's understanding of the project, the firm's knowledge of Cypress and local issues, and LSA's experience in preparing environmental documents that are similar in scope and nature to this project. The work would be completed under LSA's contract with the City to provide on-call environmental consulting services.

Ryan Bensley will act as Principal in Charge and Matthew Wiswell will serve as Project Manager for this task order. Mr. Bensley and Mr. Wiswell have extensive experience managing the preparation of environmental documents for the City, including recent experience on the Goodman Commerce Center IS/MND, which involved the development of two new warehouse buildings in the Cypress Business Park. Mr. Bensley also recently managed the preparation of the 5701 Katella Avenue Parking Structure IS/MND Addendum for the City, which included the development of a five-story parking structure to serve a nearby office building in the Cypress Business Park.

It is LSA's philosophy to prepare proposals that represent the real work effort that will be required and, with that, a realistic budget. If LSA's proposal is accepted, upon receipt of a Notice to Proceed, the firm is prepared to move forward with completing the Scope of Work outlined in this proposal as soon as possible in accordance with a project schedule that is agreed upon with the City.

Should you require further information or have any questions regarding the enclosed materials, please do not hesitate to contact me at Mr. Bensley at (714) 926-9283 or [Ryan.Bensley@lsa.net](mailto:Ryan.Bensley@lsa.net), or Mr. Wiswell at (510) 236-6810 or [Matthew.Wiswell@lsa.net](mailto:Matthew.Wiswell@lsa.net).

Sincerely,

**LSA Associates, Inc.**

Ryan Bensley  
Principal in Charge

Attachment: Proposal to Prepare an Environmental Document and Technical Studies

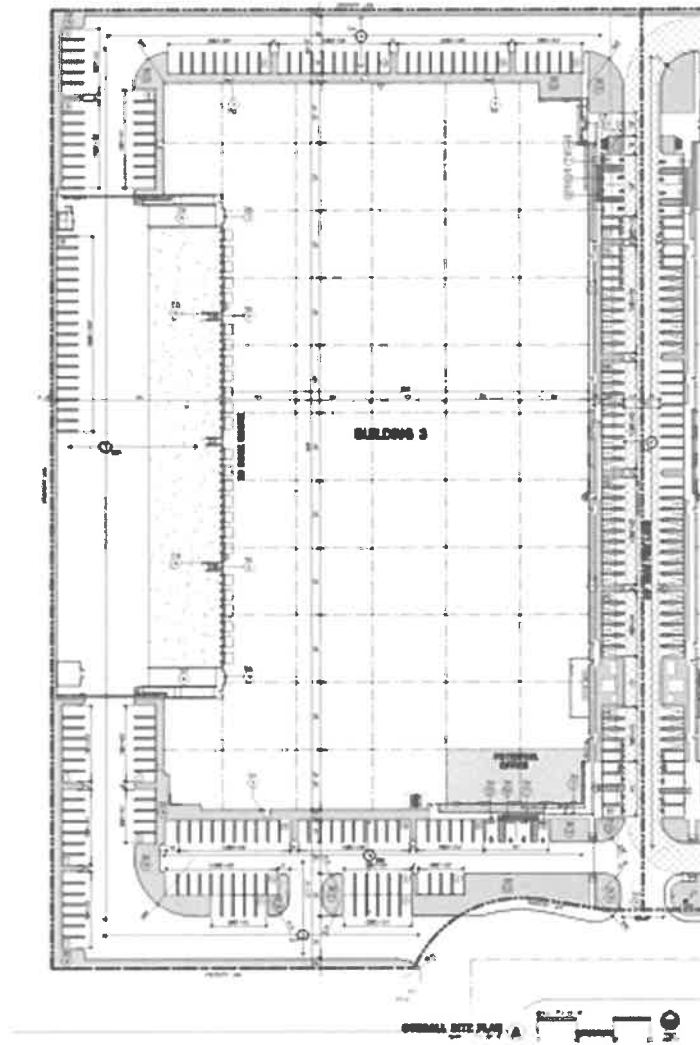
3210 El Camino Real, Suite 100, Irvine, California 92602 949.553.0666 [www.lsa.net](http://www.lsa.net)

*LSA is a business name of LSA Associates, Inc.*



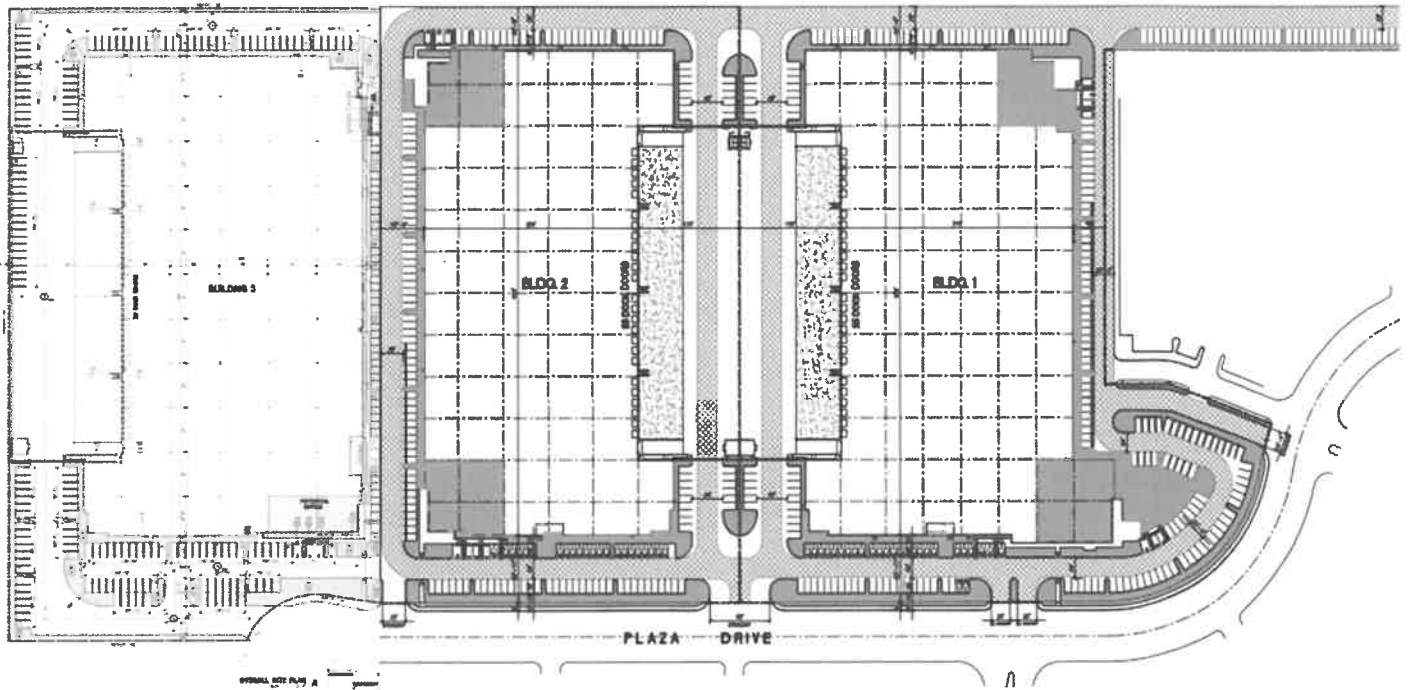
**Schedule 6**

**Site Plan for 5665 Plaza Drive**



Schedule 7

Site Plan for Goodman Commerce Center



**Schedule 8**

**6-Month Strategic Plan**

**CITY OF CYPRESS  
SIX-MONTH STRATEGIC OBJECTIVES  
October 2023 – March 2024**

<b>MAINTAIN FINANCIAL STABILITY AND PROMOTE ECONOMIC ACTIVITY</b>						
<b>WHEN</b>	<b>WHO</b>	<b>WHAT</b>	<b>STATUS</b>			<b>COMMENTS</b>
			<b>DONE</b>	<b>ON TARGET</b>	<b>REVISED</b>	
1. At the March 25, 2024 City Council meeting	Finance Director	Recommend options for Pension Trust assets to fully offset CalPERS unfunded actuarial pension liabilities by 2030 to the City Council.			X	
2. At the January 22, 2024 City Council meeting	Planning Director	Recommend an agreement for the Housing Element Implementation public outreach plan to the City Council.	X			
3. At the January 29, 2024 City Council meeting	Planning Director	Recommend the second phase of disposition of 5732 Lincoln Ave. to the City Council.			X	
4. At the February 26, 2024 City Council workshop	Planning Director	Present the Cypress Business Park Specific Plan modernization plan to the City Council.		X		

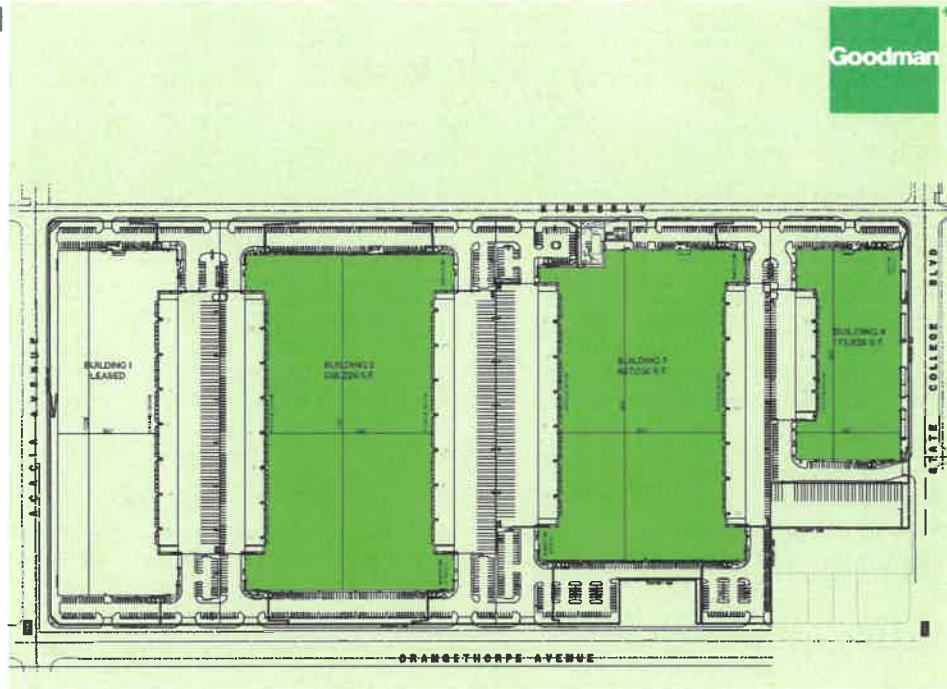
## Schedule 9

### Examples of Goodman Logistics Centers

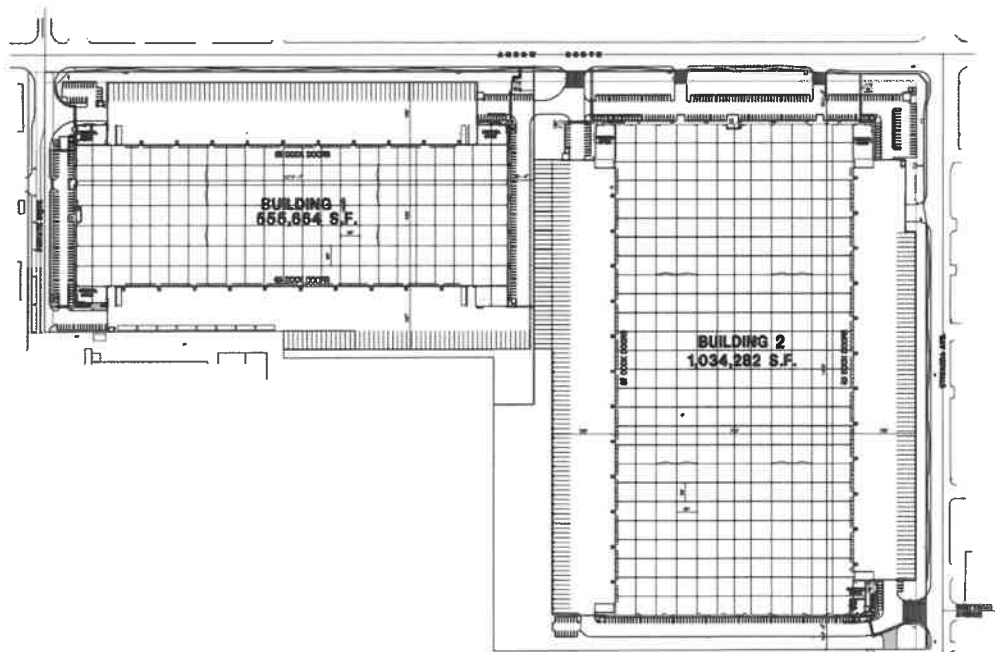
#### Fullerton

##### GLC FULLERTON SITE PLAN

<b>BUILDING 2</b>	<b>538,226 sqft</b>
Clear height	40'
Office	8,323 sqft
Mezzanine (N)	8,123 sqft
Mezzanine (S)	6,123 sqft
Car parking	412
Dock doors	99
Trailer parking	75 stalls
<b>BUILDING 3</b>	<b>487,036 sqft</b>
Clear height	40'
Office	5,743 sqft
Mezzanine (N)	5,543 sqft
Mezzanine (S)	5,543 sqft
Car parking	422
Dock doors	89
Trailer parking	70 stalls
<b>BUILDING 4</b>	<b>173,825 sqft</b>
Clear height	35'
Office	5,743 sqft
Mezzanine	5,543 sqft
Car parking	143
Dock doors	23
Trailer parking	34 stalls



#### Rancho Cucamonga



**Fontana**

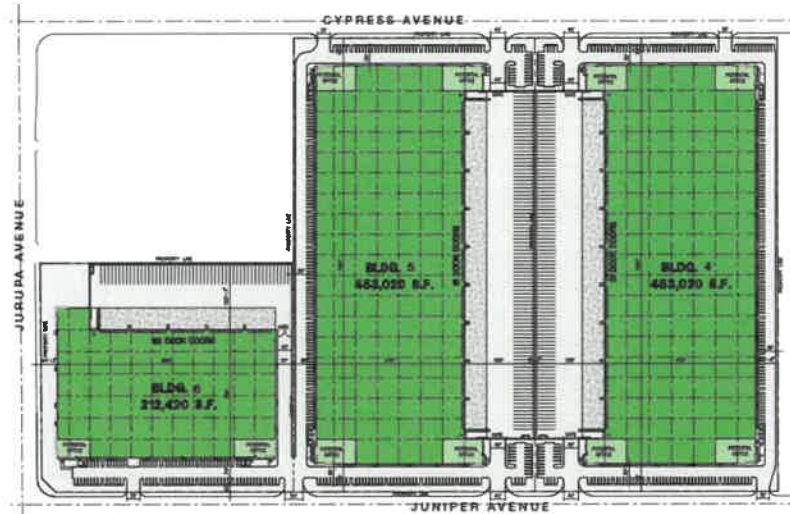
PLAN+



GOODMAN LOGISTICS CENTER FONTANA

DEVELOPMENT DETAILS

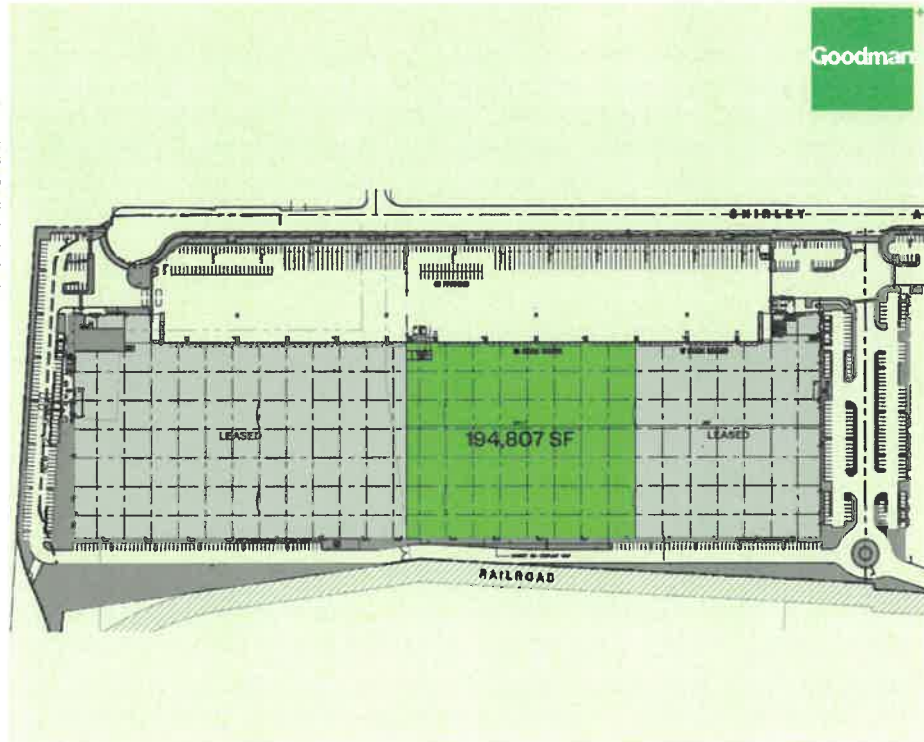
<b>Building 4</b>	<b>453,020 sqft</b>
Clear height	36'
Trailer stalls	232
Dock doors	61
Trailer parking	148 stalls
<b>Building 5</b>	<b>453,020 sqft</b>
Clear Height	36'
Trailer stalls	227
Dock doors	61
Trailer parking	92 stalls
<b>Building 8</b>	<b>212,420 sqft</b>
Clear Height	36'
Trailer stalls	87
Dock doors	32
Trailer parking	52 stalls



**El Monte**

GLC EL MONTE BUILDING 2

<b>BUILDING AREA</b>	<b>194,807 sqft</b>
Office	1,800 sqft
Dock doors	28
Trailer stalls	29
Parking stalls	53
Power	1000A 277/480V 3P 4W service
Clear height	36'
Dormers/fence	12'



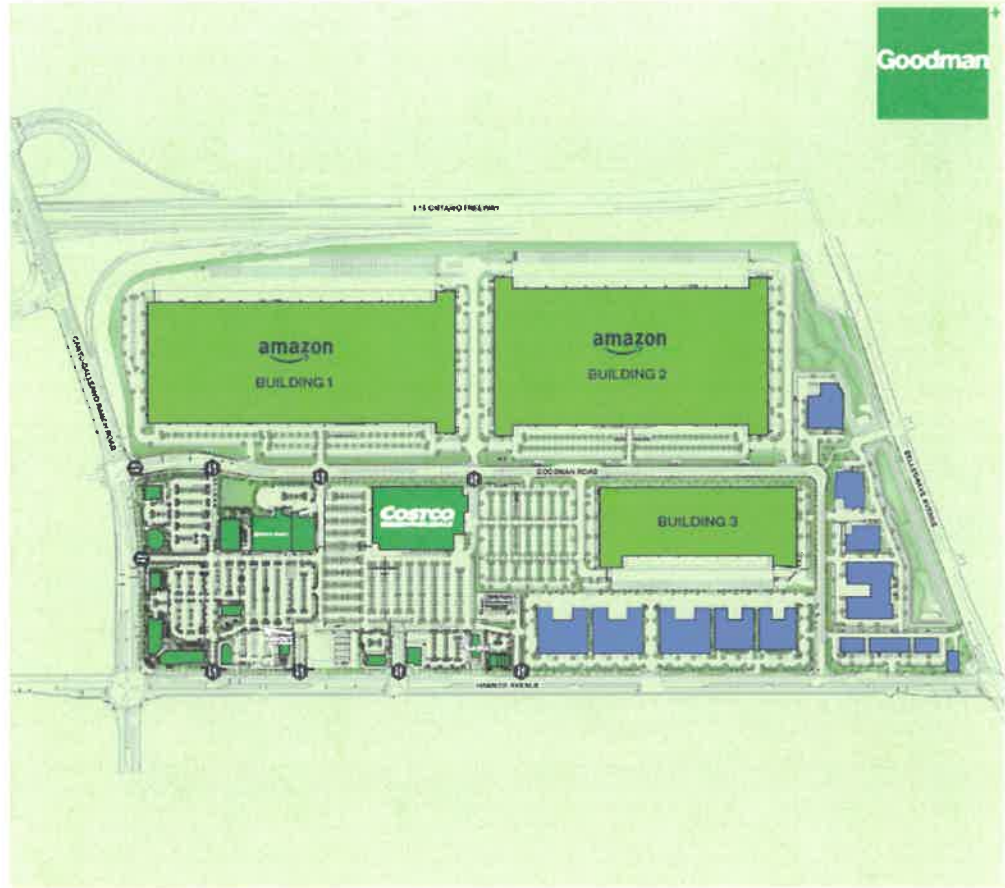
# Eastvale

## GCC EASTVALE SITE PLAN

### PROPERTY DETAILS

INDUSTRIAL BUILDING 1	LEASED
INDUSTRIAL BUILDING 2	LEASED
INDUSTRIAL BUILDING 3	LEASED
BUSINESS PARK	LEASED
RETAIL/COMMERCIAL	NOW AVAILABLE
Retail Pad 1	18,400 sqft
Building	8,000 sqft
Retail Pad 2	24,000 sqft
Building	20,000 sqft
Retail Pad 3	24,000 sqft
Building	22,000 sqft
FLEX	NOW AVAILABLE
Building 13	68,423 sqft
Building 14	68,423 sqft
Building 15	68,796 sqft
Building 16	30,546 sqft
Building 17	38,209 sqft

- BUSINESS PARK/FLEX
- INDUSTRIAL
- RETAIL
- ⊙ RETAIL ACCESS



**Schedule 10**

**Goodman California Projects**

<b>Property Type</b>	<b>Name</b>	<b>Address</b>	<b>Approximate Square Feet</b>
Logistics Center	Goodman Logistics Center Santa Fe Springs	12588 Florence Ave. Santa Fe Springs, CA	403,635 – 1,205,366
Logistics Center	Goodman Logistics Center Santa Fe Springs Building Four	10840 Norwalk Blvd Santa Fe Springs, CA	99,846
Logistics Center	Goodman Industrial Center Bloomfield	14420 Bloomfield Ave. Santa Fe Springs, CA	91,192
Logistics Center	Goodman Gateway Santa Fe Springs	12801 Excelsior Drive Santa Fe Springs, CA	989,806
Logistics Center	Goodman Industrial Center Napoleon	180-200 & 25-299 Napoleon St. San Francisco, CA	25,071 – 50,925
Logistics Center	Goodman Commerce Center Long Beach	2401 E. Wardlow Road Long Beach, CA	300,000 - 1,300,000
Logistics Center	Goodman Logistics Center Fullerton	2099 E. Orangethorpe Ave., Fullerton, CA	173,825 – 1,536,055
Logistics Center	Goodman Logistics Center El Monte	4300 Shirley Ave. El Monte, CA	1,235,443
Logistics Center	Goodman Logistics Center Fontana I	11188 Citrus Avenue Fontana, CA	639,473
Logistics Center	Goodman Logistics Center Fontana II	10985 Oleander Ave. Fontana, CA 92337	1,628,936
Logistics Center	Goodman Logistics Center Fontana III	11010 Juniper Ave. Fontana, CA 92337	1,118,460
Logistics Center	Goodman Commerce Center Los Angeles	4841 West San Fernando Los Angeles, CA 90039	620,001
Logistics Center	Goodman Logistics Center Rancho Cucamonga	8600 Etiwanda Ave. & 12521 Arrow Route Rancho Cucamonga, CA	1,589,948
Logistics Center	Goodman Industrial Center Anaheim	1256 N. Magnolia Ave. Anaheim 92801	143,248
Logistics Center	Goodman Logistics Center Compton	2517 Rosecrans Ave. Los Angeles, CA	102,150

Business Park, Logistics Center, Retail	Goodman Commerce Center Eastvale	Adjacent to I-15 between Cantu-Galleano Ranch Road and Bellegrave Avenue Eastvale, CA, USA	3,263,495
<b>TBD</b>	Goodman Commerce Center Cypress	5665 & 5757 Plaza Drive Cypress, CA 90630	581,662
Business Park	Goodman Innovation Center Belmont	200-450 Harbor Blvd. Belmont, CA	2,363 – 40,809
Flex Industrial	Goodman Innovation Center Inglewood	540-550 N. Oak Street Inglewood, CA	114,357
Flex Industrial	Goodman Commerce Center Burlingame	1755 Rollins Road Burlingame, CA 94010	83,674
Industrial	Goodman Industrial Center Arroyo	1166 Arroyo Ave. San Fernando, CA	93,160
Industrial	Goodman Industrial Center Taft	1300 West Taft Avenue Orange, CA	120,000
Land	Goodman Industrial Center San Francisco	2270 Jerrold Ave. San Francisco, CA	154,204
Storage	Goodman Industrial Center Anaheim Trailer Parking & Storage Site	1236 North Magnolia Avenue Anaheim, CA	119,792

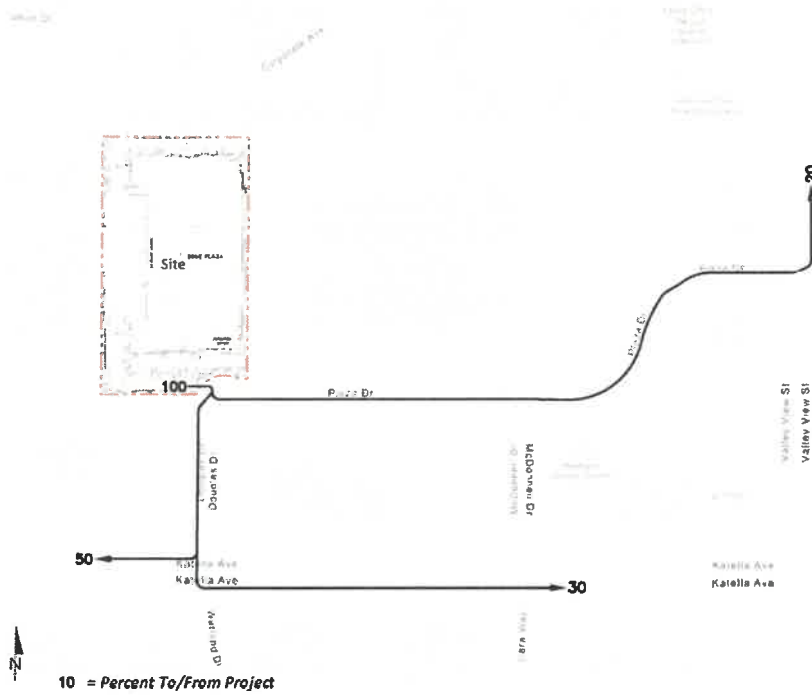


# Schedule 11

## Traffic Distribution Depictions

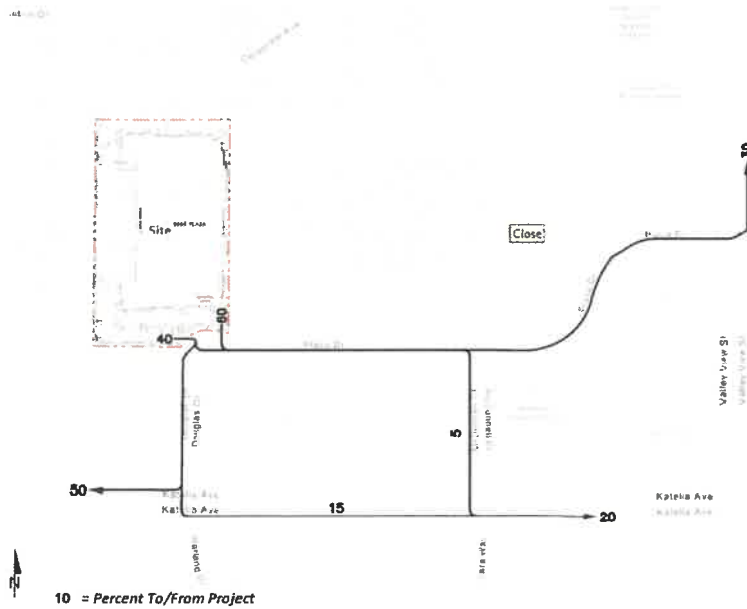
### a. 5665 PLAZA DRIVE Truck Distribution

EXHIBIT 4-1: PROJECT (TRUCK) TRIP DISTRIBUTION



### b. 5665 PLAZA DRIVE PASSENGER CAR Distribution

EXHIBIT 4-2: PROJECT (PASSENGER CAR) TRIP DISTRIBUTION





**Schedule 12**

**5665 Plaza Drive – Cumulative Development Map and Tables**

**EXHIBIT 4-4: CUMULATIVE DEVELOPMENT LOCATION MAP**



**TABLE 4-5: CUMULATIVE DEVELOPMENT LAND USE SUMMARY**

No.	Project Name	Land Use <sup>1</sup>	Quantity Units <sup>2</sup>
C1	Cypress Town Center 7-AC Residential	Multifamily (Low Rise) Housing	135 DU
C2	The Square	Shopping Center	20.800 TSF
		Multifamily (Mid-Rise) Housing	251 DU
		Hotel	120 Rooms
		Medical Office Building	31.585 TSF
C3	Goodman Commerce Center	High-Cube Warehousing	390.264 TSF
C4	5995 Plaza Drive	General Office	104.734 TSF

<sup>1</sup> TSF = Thousand Square Feet; DU = Dwelling Units

**TABLE 4-6: CUMULATIVE DEVELOPMENT TRIP GENERATION SUMMARY**

Land Use	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	
C1: Cypress Town Center	14	48	62	48	28	76	988
C2: The Square	68	96	164	176	147	323	4,978
C3: Goodman Commerce Center	35	18	53	17	37	54	956
C4: 5995 Plaza Drive	140	19	159	26	125	151	1,135
<b>Total</b>	<b>257</b>	<b>181</b>	<b>438</b>	<b>267</b>	<b>337</b>	<b>604</b>	<b>8,057</b>

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