AMENDED AGENDA

SPECIAL MEETING
CYPRESS CITY COUNCIL
November 18, 2024
5:00 P.M.

www.cypressca.org

5275 Orange Avenue
Cypress, California

Interested in speaking to the City Council? Information about participating in the City Council meeting appears at the end of the agenda.

AGENDA AMENDMENT

- Pursuant to Government Code Section 54953, this Special City Council Meeting includes teleconference participation by Council Member Anne Mallari from Cypress City Hall, 5275 Orange Avenue, Cypress, CA 90630.

CALL TO ORDER

5:00 P.M.
Council Chambers

ROLL CALL

Cypress City Council, also acting as the Ex-Officio Governing Board of Directors of the Cypress Recreation and Park District

Mayor Scott Minikus
Mayor Pro Tem Bonnie Peat
Council Member David Burke
Council Member Anne Mallari
Council Member Frances Marquez

ORAL COMMUNICATIONS ON AGENDA ITEMS

(Three minutes per speaker. The City Council may adjust the time allotted per speaker.)

The public may address the City Council on agenda items prior to any action taken. Although Council Members may provide brief responses, the City Council may not engage in a discussion with members of the public during the meeting. Please complete a Speaker's Card to address the City Council in-person. Please follow the instructions at the end of the agenda and wait for the Mayor/City Clerk to call on you to address the City Council virtually. Speakers providing in-person comments will be called first. Members of the public are encouraged to communicate with the City Council via email at adm@cypressca.org or by calling 714-229-6699.

CONSENT CALENDAR

All matters listed on the Consent Calendar are to be approved with one motion unless a Council Member requests separate action on a specific item. Council Members voting no or abstaining on a Consent Calendar item may do so without removing the item from the Consent Calendar.

1. **Introduce and/or Adopt All Ordinances and Resolutions Presented for Consideration by Title Only and to Waive Further Reading**

2. **Amend Section 21A of the Municipal Code Related to Purchasing Thresholds**

   Prepared by: Matt Burton, Director of Finance and Administrative Services

   Recommendation: Introduce for first reading an Ordinance, by title only, amending Section 21A of the Municipal Code authorizing changes in purchasing bid procedures and contract award thresholds.

PUBLIC HEARINGS (Three minutes per speaker)

The public may address the City Council on public hearing items prior to any action taken. Although Council Members may provide brief responses, the City Council may not engage in a discussion with members of the public during the meeting. Please complete a Speaker's Card to address the City Council in-person. Please follow the instructions at the end of the agenda and wait for the Mayor/City Clerk to call on you to address the City Council virtually. Speakers providing in-person comments will be called first.

Council Members should disclose communications with anyone relevant to a Public Hearing item.

3. **Approve a Specific Plan Amendment and Site Plan Review, and Certify an Environmental Impact Report for a Light Industrial/Warehouse Building at 5665 Plaza Drive**

   Prepared by: Alicia Velasco, Planning Director

   Recommendation:

   1. Introduce for first reading an Ordinance amending the McDonnell Center Specific Plan; and

   2. Adopt a Resolution approving a Site Plan Review for the 5665 Plaza Dr. project; and

   3. Adopt a Resolution certifying the Environmental Impact Report, approving the Findings of Fact and the Mitigation Monitoring and Reporting Program.

NEW BUSINESS

4. Approve a Resolution Adopting Procedural Requirements as Prerequisites for Any Council Member Wishing to Retain Separate Legal Counsel to Represent Them on City-Related Matters

Prepared by: Fred Galante, City Attorney

Recommendation: Approve a Resolution adopting procedural requirements as prerequisites for any Council Member wishing to retain separate legal counsel to represent them on City-related matters.

ITEMS REMOVED FROM CONSENT CALENDAR

CLOSED SESSION

PUBLIC EMPLOYEE PERFORMANCE EVALUATION
Pursuant to Government Code Section 54957
Title: City Manager

REPORT OF CLOSED SESSION

City Attorney

ADJOURNMENT

The next meeting will be an adjourned Regular Meeting, to be held on Monday, December 9, 2024, beginning at 5:30 p.m. in the Executive Board Room.

Council Members and the public should promptly exit the Council Chambers and proceed through the Civic Center to the parking lot.

I hereby certify under penalty of perjury under the laws of the State of California, that the foregoing Agenda was posted on the City Hall bulletin board and City website not less than 72 hours prior to the meeting. Dated this 14th day of November, 2024.

_____
Alisha Farnell, City Clerk

PUBLIC PARTICIPATION

Members of the public can participate in the City Council meeting in the following ways:

1. Attend In-Person. First-come, first-served seating is available. All attendees must be free of any symptoms associated with contagious illnesses.

2. Attend Virtually via Webinar. Follow this link: **https://attendee.gotowebinar.com/register/8280846923543729494**. Advanced registration is recommended.

The public may address the City Council virtually during Oral Communications on Agenda Items and Public Hearings. Virtual participants must click the 'hand raise' button prior to the end of the first in-person speaker to indicate they wish to address the City Council. Upon clicking the 'hand raise' button, please unmute your microphone and wait for the Mayor/City Clerk to call on you.

 = Hand Raise  = Unmute

3. Submit Public Comments Prior to the Meeting. The public may submit comments via email to cityclerk@cypressca.org. Comments submitted by 3:00 p.m. on the day of the meeting will be added to the meeting record.

4. Watch the Meeting. The City Council meeting can be viewed on Spectrum Cable Channel 36 or on the City's website at **www.cypressca.org/watchlive**.

5. Listen to the Meeting. Listen-only teleconferencing is available by calling (631) 992-3221 and entering Access Code 374-290-829. No registration or audio pin is necessary.

AMERICANS WITH DISABILITIES ACT

In compliance with the Americans With Disabilities Act, if you need special assistance to participate in this meeting, you should contact the City Clerk at (714) 229-6685 at least 24 hours prior to the meeting to enable the City to make reasonable arrangements to assure accessibility to this meeting.

CITY OF CYPRESS

CITY COUNCIL REPORT

City Council Special **2.**

FROM: Matt Burton, Director of Finance and Administrative Services

DATE: 11/18/2024

SUBJECT: Amend Section 21A of the Municipal Code Related to Purchasing Thresholds

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RECOMMENDATION

Introduce for first reading an Ordinance, by title only, amending Section 21A of the Municipal Code authorizing changes in purchasing bid procedures and contract award thresholds.

DISCUSSION

The City Council's Strategic Plan includes an objective to recommend updates to the $25,000 administrative purchasing threshold based on an analysis of Orange County cities. That review found that, among cities with a population greater than 10,000, Cypress' $25,000 limit is the lowest in the county. Purchasing limits in these cities range from $25,000 to $1 million, with the majority having administrative approval authority between $50,000 and $100,000 (Exhibit One attached).

Background

Municipal Code Section 21A establishes the City's purchasing system, including bid procedures and contract award thresholds, which may be updated periodically based on inflation to ensure the purchasing process remains efficient. Section 21A was last updated in 1999, when the City Council increased administrative approval authority for purchases of supplies, equipment, and services to the lowest responsible bidder from $10,000 to $25,000. The 1999 update made the City's procurement process more efficient by decreasing the time and costs associated with small dollar purchases and enabled the City Council to focus on policymaking. The recommended update has the same goal.

Discussion

In the 25 years since Section 21A was updated, the cost of all goods and services has risen significantly. This has increased the number of contracts and purchases that require City Council consideration. Rampant inflation since the pandemic has dramatically eroded purchasing power, requiring limited staff resources to be spent preparing agenda reports for minor purchases that previously could have been approved administratively.

In addition to the survey of Orange County cities, the recommendation to update the administrative approval threshold is also based on:

- Consumer Price Index (CPI) increases. CPI is the most widely-accepted methodology for calculating the impact of inflation. Between 1999 and 2024, CPI in Southern California increased by approximately 105 percent, meaning a $25,000 purchase in 1999 is the equivalent of $51,250 in 2024.
- Growth in the City's budget. In FY 1998-99, the General Fund operating budget was $16 million. In FY 2024-25, it has increased 150% to $40 million. In 1999, $25,000 represented 0.16 percent of the General Fund operating budget. In 2024, $25,000 represents 0.06 percent of the General Fund operating budget, while $50,000 represents 0.13 percent of the General Fund operating budget.
- The volume of contracts that require City Council consideration. The City Council has considered 120 contracts and purchases since 2021. Twenty-eight (23%) were less than $50,000 and 92 (77%) were more than $50,000. 100% of these purchases were approved by the City Council and nearly all of them were approved unanimously. The recommended administrative approval threshold update would impact approximately seven contracts and purchases annually and free up approximately 80 hours of staff time a year.

Additionally, it is common for departments to bring notable matters to the City Council for consideration even when the contract/purchase is under $25,000 and that practice will continue with the recommended update. Finally, all contracts and purchases that are administratively approved must be included in the annual operating budget approved by the City Council. Any contract or purchase that was not included in the Budget, or that requires an additional appropriation, will continue to require City Council approval.

Bidding Requirement

In 2001, the City Council set the bid threshold for supplies and equipment at $2,500 and services at $5,000. However, the City's practice has been more rigorous and the purchasing system has generally operated with a $1,000 bid threshold to ensure purchases are transparent and cost-effective. The availability of information on the Internet, cooperative purchasing agreements, and other technologies have made it possible to adhere to the $1,000 threshold without overtaxing staff.

The Municipal Code establishes two types of bid processes: informal and formal. Purchases under $25,000 are bid informally, which requires a minimum of three bids solicited directly from vendors or online. The informal bids must be summarized/documented before the purchase is approved. Contracts and purchases over $25,000 are subject to formal bidding. Formal bidding is a significant undertaking and involves preparing and publishing a notice inviting bids, soliciting bids from prospective vendors who have requested to be on the City's bidders' list, and establishing a deadline for the submission of sealed bids. The formal bid process is designed to ensure bidding on larger purchases is competitive and open to all interested vendors. Formal bidding requires considerable staff resources and takes much longer than informal bidding.

The recommended update would only adjust the formal bidding threshold. Informal bidding is still required for all purchases of supplies and equipment having a cost greater than $2,500 and services with a cost greater than $5,000.

At its November 12 meeting, the City Council discussed options for amending the purchasing thresholds. Based on City Council direction, it is recommended that:

- Formal bidding is required for contracts or services of more than $50,000, regardless of the length of the contract. This will ensure the City receives the lowest possible market pricing available through a competitive bid process open to all interested parties.
- The threshold for administrative approval of informally bid agreements increases to $50,000.
- The threshold for administrative approval of formally bid multi-year agreements is $100,000, for up to a maximum five-year term. This means any agreement for more than $100,000 requires City Council approval, regardless of its length, and that any contract with a term (including options) of more than five years requires City Council approval, regardless of its value.
- The above thresholds shall be updated by Resolution every five years based on CPI and rounded to the nearest $5,000.
- All administratively approved contracts and purchases impacted by the recommended threshold update will be presented to the City Council twice a year and posted on the Transparency in Government page on the website. This new practice is consistent with the City's core values of accountability, transparency, and fiscal prudence, and will be incorporated into the City's fiscal strategies during the upcoming budget process.

No other changes are recommended to the purchasing system or policies, and all other requirements of Section 21A remain in effect.

BUDGET IMPACT

There is no direct budget impact associated with the recommendation. However, the City's limited staff resources required to prepare agenda reports for contracts and purchases will be available to provide other services to the community.

LEGAL REVIEW

The City Attorney has reviewed and approved the attached Ordinance.

APPROVED BY: Peter Grant, City Manager

Attachments

Ordinance
Ordinance - Redline

ORDINANCE NO.

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF CYPRESS, CALIFORNIA, AMMENDING SECTION 21A OF THE CYPRESS MUNICIPAL CODE ESTABLISHING UPDATED PURCHASING AUTHORITY LIMITS FOR CITY PERSONNEL

WHEREAS, section 21A of the Cypress Municipal Code establishes the requirements for the City's purchasing system and includes monetary limits on bid procedures and contract award thresholds; and

WHEREAS, the current monetary limits on bid procedures and contract award thresholds was last adjusted in 1999 from $10,000 to $25,000; and

WHEREAS, inflation since 1999 in the Los Angeles, Long Beach and Anaheim area has increased by more than 100% over this time; and

WHEREAS, a survey of all 34 Orange County cities was conducted which indicated Cypress' threshold was the second lowest in the County; and

WHEREAS, it is appropriate to periodically update the monetary limits on bid procedures and contract award thresholds to ensure the efficient use of staffing resources and limit the number of routine items presented to City Council for consideration; and

NOW, THEREFORE, the City Council of the City of Cypress DOES HEREBY ORDAIN as follows:

SECTION 1. Section 21A of the Cypress Municipal Code is hereby amended to read as follows:

"Sec. 21A-10(d).**Bidding generally**

When there is to be a contract for professional services such as, but not limited to, the services of attorneys, architects, or engineers or where the service contracted for deals with public relations or promotions, elections, negotiations, acquisition of land, trash, garbage or refuse disposal or the like, insurance, bonds, any other services of similar nature to those listed, those items which are in their nature unique and not subject to competition or other services for which by law another officer or body is specifically charged with obtaining. For professional services, a request for qualifications, ('RFQ'), should be used to select the appropriate professional or professionals. For contracts of $50,000 or less the city manager is authorized to enter into the contract. Further, the city manager may enter into contracts up to five years in duration if the total value of the contract does not exceed $100,000 for the term of the contract. All contracts in excess of $50,000 shall be approved by the city council, except as noted above.

These limits shall be updated based on the October Consumer Price Index for Los

Angeles - Long Beach – Anaheim, CA as published by the Bureau of Labor Statistics. The first update will be effective in January 2030 and updated every five years thereafter by resolution of the City Council.

Sec. 21A-10(h).**Bidding generally**

Any contract which combines professional services and the acquisition of goods or equipment where the professional services are specifically retained to advise the city on the selection of the goods or equipment and the professional services utilized under the contract also include designing, retrofitting, or modifying the goods or equipment to meet the particular needs of the city. This exemption shall also include the acquisition by the city of 'intellectual property.' In utilizing this exemption, an RFQ shall be used. For contracts of $50,000 or less the city manager is authorized to enter into the contract. Further, the city manager may enter into contracts up to five years in duration if the total value of the contract does not exceed $100,000 for the term of the contract. All contracts in excess of $50,000 shall be approved by the City Council, except as noted above.

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Sec. 21A-12.**Formal contract procedure**

Except as otherwise provided herein and in accordance with the city's power as a Charter City, purchases of supplies, equipment, or services of an individual of an estimated value greater than $50,000 shall be by written contract with the lowest responsible bidder, pursuant to the procedure hereinafter prescribed.

Sec. 21A-13.**Open market procedure**

Purchases of supplies, equipment, and services of an estimated value in the amount of $50,000 or less may be made by the purchasing officer in the open market pursuant to the procedure prescribed in section 21A-12; provided, however, all bidding may be dispensed with for purchases of supplies, equipment, and services having a total estimated value of less than the amount established by resolution of the city council pursuant to section 21A-10.

Sec. 21A-17.**Contracting for the purchase of supplies, equipment, services, or leases; exemption.**

The purchasing officer, with the approval of the council, may contract for supplies equipment, services, or leases without observing the procedure required herein regardless of estimated value of such supplies, equipment, services, or leases when the best interests of the city would be served thereby. Whenever the council approves the purchase of supplies, equipment, services, or leases without observing the procedures

required in this chapter, the council may require that the purchasing officer solicit informal bids under such conditions and limitations as the city council may impose. This exemption section shall not apply to any public work contract.

SECTION 2. If any section, subsection, subdivision, sentence, clause, phrase, or portion of this Ordinance is for any reason held to be invalid or unconstitutional by the decision of any court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of the Ordinance. The City Council hereby declares that it would have adopted this Ordinance and each section, subsection, subdivision, sentence, clause, phrase, or portion thereof irrespective of the fact that any one or more sections, subsections, subdivisions, sentences, clauses, phrases or portions thereof be declared invalid or unconstitutional.

SECTION 3. The City Clerk shall certify to the passage of this Ordinance and this Ordinance shall be published as required by law and shall take effect as provided by law.

FIRST READING at a regular meeting of the City Council of the City of Cypress held on the _____ day of _____, 2024 and finally adopted and ordered posted at a regular meeting held on the _____ day of _____, 2024.

_____
MAYOR OF THE CITY OF CYPRESS

ATTEST:

_____
CITY CLERK OF THE CITY OF CYPRESS

STATE OF CALIFORNIA }
COUNTY OF ORANGE } SS

I, ALISHA FARNELL, City Clerk of the City of Cypress, DO HEREBY CERTIFY that the foregoing Ordinance was duly adopted at a regular meeting of the said City Council held on the ___ day of ___, 2024, by the following roll call vote:

AYES: COUNCIL MEMBERS:
NOES: COUNCIL MEMBERS:
ABSENT: COUNCIL MEMBERS:

_____
CITY CLERK OF THE CITY OF CYPRESS

ORDINANCE NO.

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF CYPRESS, CALIFORNIA, AMMENDING SECTION 21A OF THE CYPRESS MUNICIPAL CODE ESTABLISHING UPDATED PURCHASING AUTHORITY LIMITS FOR CITY PERSONNEL

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WHEREAS, the current monetary limits on bid procedures and contract award thresholds was last adjusted in 1999 from $10,000 to $25,000; and

WHEREAS, inflation since 1999 in the Los Angeles, Long Beach and Anaheim area has increased by more than 100% over this time; and

WHEREAS, a survey of all 34 Orange County cities was conducted which indicated Cypress' threshold was the second lowest in the County; and

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The purchasing officer, with the approval of the council, may contract for supplies equipment, services, or leases without observing the procedure required herein regardless of estimated value of such supplies, equipment, services, or leases when the best interests of the city would be served thereby. Whenever the council approves the

purchase of supplies, equipment, services, or leases without observing the procedures required in this chapter, the council may require that the purchasing officer solicit informal bids under such conditions and limitations as the city council may impose. This exemption section shall not apply to any public work contract. ~~of a total value of $25,000 or more.~~

SECTION 2. If any section, subsection, subdivision, sentence, clause, phrase, or portion of this Ordinance is for any reason held to be invalid or unconstitutional by the decision of any court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of the Ordinance. The City Council hereby declares that it would have adopted this Ordinance and each section, subsection, subdivision, sentence, clause, phrase, or portion thereof irrespective of the fact that any one or more sections, subsections, subdivisions, sentences, clauses, phrases or portions thereof be declared invalid or unconstitutional.

SECTION 3. The City Clerk shall certify to the passage of this Ordinance and this Ordinance shall be published as required by law and shall take effect as provided by law.

FIRST READING at a regular meeting of the City Council of the City of Cypress held on the _____ day of _____, 2024 and finally adopted and ordered posted at a regular meeting held on the _____ day of _____, 2024.

_____
MAYOR OF THE CITY OF CYPRESS

ATTEST:

_____
CITY CLERK OF THE CITY OF CYPRESS

STATE OF CALIFORNIA }
COUNTY OF ORANGE } SS

I, ALISHA FARNELL, City Clerk of the City of Cypress, DO HEREBY CERTIFY that the foregoing Ordinance was duly adopted at a regular meeting of the said City Council held on the ___ day of ___, 2024, by the following roll call vote:

AYES: COUNCIL MEMBERS:
NOES: COUNCIL MEMBERS:
ABSENT: COUNCIL MEMBERS:

_____
CITY CLERK OF THE CITY OF CYPRESS

CITY OF CYPRESS

CITY COUNCIL REPORT

City Council Special **3.**

FROM: Alicia Velasco, Planning Director

DATE: 11/18/2024

SUBJECT: **Approve a Specific Plan Amendment and Site Plan Review, and Certify an Environmental Impact Report for a Light Industrial/Warehouse Building at 5665 Plaza Drive**

RECOMMENDATION

1. Introduce for first reading an Ordinance amending the McDonnell Center Specific Plan; and

2. Adopt a Resolution approving a Site Plan Review for the 5665 Plaza Dr. project; and

3. Adopt a Resolution certifying the Environmental Impact Report, approving the Findings of Fact and the Mitigation Monitoring and Reporting Program.

SUMMARY

GLC Cypress, LLC (Goodman) applied for an amendment to the McDonnell Center Specific Plan to remove the maximum square footage requirement and permit light industrial/warehouse uses in the eastern portion of Planning Area 1. The application proposes to redevelop an office building with a light industrial/warehouse building. An Environmental Impact Report (EIR) found no significant impacts with the implementation of mitigation measures and recommended conditions of approval. The project is recommended for approval because it is consistent with the General Plan and the amended McDonnell Center Specific Plan.

DISCUSSION

Project Description

The project proposes to redevelop an existing office building with a 191,394 square foot light industrial/warehouse building with 25 dock-high doors and surface parking on 8.53 acres at Plaza Drive and Douglas Drive. The proposed building includes 10,333 square feet of office space, 206 surface parking spaces and landscaping.

Subject Property and Surrounding Land Uses

The project is in the 71.23 acre McDonnell Center Specific Plan (Specific Plan), which was adopted in 1982 and amended in 1994. The site is currently occupied by a vacant 150,626 square foot five-story, 1980's-era office building, surface parking and landscaping. Water, sewer, and dry utilities serve the site from Plaza Drive. The project will demolish the vacant office building.

The project is bounded by:

Direction	Land Use	Zoning
North	Light Industrial	PC 5 - Cypress View Limited Specific Plan
South	Office	PC 3 - McDonnell Center Specific Plan
East	Light Industrial/Warehouse	PC 3 - McDonnell Center Specific Plan
West	Light Industrial/Warehouse	PC 3 - McDonnell Center Specific Plan

Regulatory Control

General Plan/Zoning/Specific Plan and Required Discretionary Actions

The site is designated as Specific Plan Area by the General Plan, zoned PC-3 and governed by the Specific Plan. The site is in the eastern portion of Planning Area 1. The Specific Plan includes light industrial and warehouse uses in the western portion of Planning Area 1, with only office uses permitted in the eastern portion. This is a function of the Specific Plan being written at the same time the business park was first developed and zoning was set to match the buildings being constructed. The recommended Specific Plan amendment permits light industrial and warehouse uses throughout Planning Area 1 and eliminates a cap on maximum square footage.

Specific Plan Amendment

The recommended Specific Plan amendment is consistent with the buildings that surround the site and accounts for current market trends, which favor light industrial over office - especially on sites located off major arterial streets such as Plaza Drive. After acquiring the site, Goodman attempted to lease the office building for more than two years without success.

The Specific Plan limits maximum square footage in the Planning Areas. However, other Specific Plan standards - such as height, lot coverage, floor area ratio, and parking - regulate development size, making the square footage limit redundant. The recommended amendment removes the maximum square footage limit.

Zoning Ordinance Section 4.20.080 outlines the findings required for a Specific Plan amendment, which are addressed in the attached Specific Plan Amendment Ordinance.

Site Plan Review

The Specific Plan requires Site Plan Review for any new development that requires a building permit and increases square footage. Specific Plan Section VI.C.6 establishes the necessary findings for Site Plan Review approval and the findings are included in the attached Resolution. The recommended amendment applies an administrative review process to light manufacturing and warehouse uses. Other uses (e.g. recycling centers and vocational schools) require the City Council to approve a Conditional Use Permit.

Although tenants have been identified, it is important to note that logistics uses are prohibited throughout Cypress and in the Specific Plan. The recommended amendment does not change this prohibition, and to further clarify that logistics cannot be permitted, the following condition of approval is recommended:

- **Condition 2.9:** Third Party Logistics uses are prohibited within the building. Third Party Logistics refers to business entities that provide short-term storage and fulfillment services for finished consumer goods.

Development Standards

The project meets the Specific Plan development standards :

Standards	Required	Proposed
Building Setback (from Plaza Dr)	30'	~70'
Building Setback (from interior property line)	5'	West: 85' North: 60'-3" East: 43'
Surface Parking Setbacks	10'	>10'
Height	99'	51'-6"
Lot Coverage	60%	50.1%
Floor Area Ratio	1.0	0.51

SITE PLAN REVIEW

Access, Parking and Loading
The project will be accessed by two driveways off Plaza Drive. The Specific Plan establishes minimum parking requirements by use, which the project exceeds.

Land Use	Parking Standards	Parking Spaces
Office	1 space per 250 sf	42
Light Industrial/ Warehouse	Not less than: • 2 spaces per 1,000 sf for the first 20,000 sf • 1 space per 2,000 sf for the second 20,000 sf • 1 space per 4,000 sf above 40,000 sf	86
	Spaces Required	**128**
	Spaces Provided	**206**

The northernmost 60 feet of the site is in the PS (Semi-Public) zone and contains 39 parking spaces. A condition of approval (Condition 2.7) is recommended to require an easement is recorded against the property to ensure the parking is open to the public. Condition 2.8 requires the developer to install signage indicating the parking in the PS zone is open to the public on Monday through Friday from 7 p.m. to 6 a.m. and all day on Saturday and Sunday.

Building Design and Landscaping
The building is consistent with the Specific Plan design guidelines and complements the surrounding buildings. The building has a contemporary architectural style, with a neutral color palate and a variety of materials. It features a prominent primary entrance enhanced by increased building height, a canopy and blue reflective glazing. The building is sustainably designed, including:

- Leadership in Energy and Environmental Design (LEED) Certified
- Carbon reduced construction
- Photovoltaic solar arrays
- Electric vehicle chargers for customers and employees

ENVIRONMENTAL REVIEW

Earlier this year, an Initial Study assessed the project's environmental impacts. Although the study found no significant unavoidable impacts, Goodman agreed to undertake a more comprehensive environmental review and an Environmental Impact Report (EIR) was prepared. A Notice of Preparation (NOP) was issued on May 7, 2024, and a virtual public scoping meeting to gather input on issues analyzed by the EIR was held on May 28, 2024.

The Draft EIR was available for public review from August 12 to September 27, 2024. Four comments were submitted during the 45-day review period (three from government agencies and one from a private party). The comments were addressed and are attached. The comments did not require revisions to critical information in the Draft EIR, nor did they identify new significant information that required the Draft EIR to be recirculated. The Final EIR responds to the comments and includes an Errata section detailing minor modifications to the Draft EIR.

As required by CEQA, the EIR includes a Cumulative Impacts analysis and considers related projects. The EIR did not identify any Significant Unavoidable Impacts. The Draft EIR and Final EIR are attached. Due to file size, the appendices can be found on the website: https://www.cypressca.org/departments/community-development/information-on-notable-projects/goodman-commerce-center-5665-plaza-drive.

The EIR includes a detailed analysis of all State-mandated environmental issue areas. This enhanced analysis found no additional potential impacts beyond what was identified in the Initial Study. The EIR found the project had no potential impact or a less than significant impact for the environmental factors considered. With the implementation of the measures in the Mitigation Monitoring and Reporting Program (MMRP), all other potential environmental impacts were reduced to less than significant. The MMRP also includes measures to ensure regulatory compliance with other State and local regulations.

Environmental Factor	Level of Impact	Mitigation
Aesthetics	Less than Significant	None
Agriculture & Forestry Resources	No Impact	None
Air Quality	Less than Significant	None
Biological Resources	Less than Significant	None
Cultural Resources	Less than Significant with Mitigation	Mitigation Measure CUL-1
Energy	Less than Significant	None
Geology and Soils	Less than Significant with Mitigation	Mitigation Measures GEO-1 and GEO-2
Greenhouse Gas Emissions	Less than Significant	None
Hazards and Hazardous Materials	Less than Significant	None
Hydrology and Water Quality	Less than Significant	None

Land Use and Planning	Less than Significant	None
Mineral Resources	No Impact	None
Noise	Less than Significant with Mitigation	Mitigation Measure NOI-1
Population and Housing	Less than Significant	None
Public Services	Less than Significant	None
Recreation	Less than Significant	None
Transportation	Less than Significant with Mitigation	Mitigation Measure TRA-1
Tribal Cultural Resources	Less than Significant with Mitigation	Mitigation Measure TCR-1, TCR-2, and TCR-3
Utilities and Services Systems	Less than Significant	None
Wildfire	No Impact	None

Cumulative Impacts
As required by CEQA, the EIR thoroughly analyzed the project's cumulative impacts, in conjunction with the adjacent project at 5757 Plaza Drive, and found that it will not result in any cumulative impacts. CEQA's primary focus is on assessing potential environmental changes caused by a project. This involves comparing the potential impacts of the project to the current environmental baseline. The 5757 Plaza Drive project replaced a 338,653 square-foot warehouse with two warehouses totaling 390,000 square feet. This project (5665 Plaza Drive) replaces a 150,626 square-foot office building with a 191,394 square-foot light industrial/warehouse building. Together, the projects total 92,115 square feet of new building in an urbanized, fully developed business park. The relatively minor increase does not result in any cumulative impacts on environmental factors including noise, air quality, traffic, utilities, or police and fire services.

Soil Compaction
The project will use deep dynamic compaction (DDC) to compact soil. DDC is a soil stabilization technique that involves repeatedly dropping a 10-ton weight from 60 feet. DDC may generate vibrations that could be uncomfortable for humans – as was in the case during the development of 5757 Plaza Drive. While those impacts are not expected with this project given its location, several measures are recommended in the MMRP and Conditions of Approval to mitigate potential DDC impacts. Specifically, Conditions 3.3 through 3.10 address DDC and require that Goodman:

- Notify nearby businesses and provide the schedule and duration of DDC activities
- Assign a Disturbance Coordinator responsible for responding to complaints/concerns arising from DDC
- Identify structures that may be affected by construction vibrations
- Establish vibration monitoring locations and structure-specific vibration thresholds
- Prepare a contingency plan if vibration levels approach thresholds. The contingency plan shall include contingencies including lowering the drop height or using a lighter compaction weight

If the mitigation measures do not sufficiently address the DDC impacts, the project will be required to use an alternative soil compaction method known as vibratory stone columns (VSC). VSC involves drilling large holes, approximately 15 to 20 feet deep at 10 foot intervals, filling the holes with rock, and then compacting the material. Although VSC has a lower impact on adjacent properties, it requires importing up to 400 truckloads of rock to the site, and is significantly more costly and time-intensive.

Traffic Impacts
A Traffic Impact Analysis assessed vehicle trips generated by the project and its impact on nearby intersections. The Analysis concluded that, with the required mitigation measures, the project will not cause any operational or level of service deficiencies. The project is expected to generate 406 daily trips, including 29 trips during the AM peak hour and 32 trips during the PM peak hour. This represents a net decrease of 1,030 daily trips compared to the existing office building when it was fully occupied.

Despite the overall reduction in traffic, the project will result in 78 daily heavy truck trips. While this increase is generally considered negligible, the applicant has agreed to the following Condition of Approval to ensure these trips do not impact the community or its business park neighbors:

- **Condition 2.10:** Class 8 trucks providing deliveries to and from the project site shall be directed to access and depart the site via Douglas Drive to Katella Avenue, connecting directly to the I-605 Freeway.

The EIR considered cumulative traffic impacts from 5757 and 5665 Plaza Drive and found, that after both projects are complete, all study intersections will continue to operate at Level of Service C or better. The traffic analysis and trip generation memorandum are attached and included as an EIR appendix.

A vehicle miles traveled (VMT) analysis was also prepared and determined the project's VMT impact is less than significant.

CONSISTENCY WITH GENERAL PLAN OBJECTIVES

The project is consistent with the following General Plan goals/policies:

LU-1: Create a well-balanced land use pattern that accommodates existing and future needs for housing, commercial, industrial and open space/recreation uses, while providing adequate community services to residents.

LU-2: Ensure that new development is compatible with surrounding land uses, the circulation network, availability of public facilities, and existing development constraints.

LU-10: Carefully regulate future development in the Business Park to ensure the current high quality environment is maintained.

The project will contribute to the continued economic vitality of the Business Park by replacing the obsolete, vacant office building. The project is compatible with surrounding uses and its design integrates with the Specific Plan. The project will update parking and landscaping, further enhancing the site and surrounding area.

PUBLIC HEARING / PUBLIC OUTREACH PROCESS

Public hearing notices were posted and mailed to the property owners within 500 feet of the project and to those who responded to the Draft EIR. The Final EIR was posted on the website on November 4, 2024. All public noticing requirements have been met. All written communication related to the public hearing received prior to publishing the City Council agenda is attached. Written communication submitted by 3 p.m. on November 18, 2024, will be part of the public hearing administrative record.

ALTERNATIVE ACTIONS

If the City Council identifies issues which should be addressed prior to taking action on this application, the City Council may consider:

1. Adding conditions of approval to address concerns; or
2. Continuing the public hearing and directing staff to work with the applicant to resolve the issues; or
3. Continuing the public hearing, making findings for denial and directing staff to return to City Council with a resolution for denial.

BUDGET IMPACT

None.

LEGAL REVIEW

None required.

APPROVED BY: Peter Grant, City Manager

Attachments

Specific Plan Amendment Ordinance
Site Plan Review Resolution
Project Conditions
EIR Resolution
Draft EIR
Final EIR
EIR Response to Comments and Errata
Site Plan and Elevations
Traffic Study
Trip Generation Comparison Memo
Submitted Public Comments

ORDINANCE NO.

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF CYPRESS, CALIFORNIA, ADOPTING AMENDMENTS TO CHAPTERS I (SUMMARY), III (DEVELOPMENT PLAN), V (DEVELOPMENT REGULATIONS), AND VI (IMPLEMENTATION) OF THE MCDONNELL CENTER SPECIFIC PLAN TO REMOVE THE MAXIMUM PERMITTED SQUARE FOOTAGE REQUIREMENT AND ALLOW INDUSTRIAL/WAREHOUSING USES IN THE EASTERN PORTION OF PLANNING AREA 1.

WHEREAS, the City Council of the City of Cypress has considered an application submitted by GLC Cypress, LLC ("Applicant") for a new 191,394 square-foot (sf) warehouse building and associated parking and landscaping at 5665 Plaza Drive in the McDonnell Center Amended Specific Plan area (the "Project"); and

WHEREAS, the Project requires the following to be approved by the City Council: an amendment to the McDonnell Center Amended Specific Plan (Specific Plan Amendment No. 2024-01) and a Site Plan Review (SPR No. 2024-01); and

WHEREAS, an application was filed for approval of an amendment to the McDonnell Center Amended Specific Plan ("Specific Plan") in accordance with the provisions of Section 20 (Specific Plans) of Appendix I (Zoning) of the Cypress Municipal Code to remove the maximum permitted square footage requirement and allow industrial/warehousing uses in the eastern portion of Planning Area 1; and

WHEREAS, the City Council has reviewed the goals and objectives of the General Plan as laid out in the City Council staff report dated November 12, 2024 and November 18, 2024, and finds that the proposed Specific Plan Amendment No. 2024-01 is consistent with the intent of the General Plan; and

WHEREAS, in accordance with the California Environmental Quality Act (CEQA), an Environmental Impact Report (EIR) was prepared for the Project and released to the public on August 12, 2024, for a 45-day review period. All required notifications were provided pursuant to CEQA (Public Resources Code Sections 21080.4 and 21161; Guidelines Sections 15082 and 15085) and all comment letters were incorporated into the Final EIR. The City Council has certified the EIR and made all required CEQA findings under separate resolution adopted concurrently herewith; and

WHEREAS, on November 12, 2024, the City Council held a duly noticed public hearing where the item was continued to November 18, 2024 and considered testimony on the application; and

WHEREAS, all legal prerequisites for the adoption of this ordinance have occurred.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF CYPRESS, CALIFORNIA, DOES HEREBY ORDAIN, based upon substantial evidence taken from the administrative record and at the public hearing, AS FOLLOWS:

SECTION 1. The City Council hereby specifically finds that all the facts set forth in the above Recitals are true and correct and are incorporated herein as findings of the City Council.

SECTION 2. Findings. Pursuant to Section 4.20.080 of Appendix I (Zoning) of the Cypress Municipal Code, the City Council finds, after due study and deliberation that the following circumstances exist:

1. The proposed development is in conformance with the goals, policies, and objectives of the general plan.

   The project is consistent with the following General Plan goals/policies:

   LU-1: Create a well-balanced land use pattern that accommodates existing and future needs for housing, commercial, industrial and open space/recreation uses, while providing adequate community services to residents.

   LU-2: Ensure that new development is compatible with surrounding land uses, the circulation network, availability of public facilities, and existing development constraints.

   LU-10: Carefully regulate future development in the Business Park to ensure the current high quality environment is maintained.

   The amendment will contribute to the continued economic vitality of the Cypress Business Park by providing additional flexibility to develop the area consistent with current market demand. Allowing industrial and warehousing uses in the eastern portion of Planning Area 1 is compatible with surrounding land uses, the majority of which are light industrial. Removal of the maximum permitted square footage requirement allows for additional flexibility without compromising the high-quality environment within the Business Park. Other existing development standards, including floor area ratio, lot coverage, building height, and parking serve to ensure that development remains consistent with the General Plan and compatible with surrounding uses.

2. The design, location, shape, size, operating characteristics, and the provision of public and emergency vehicle (e.g., fire and medical) access and public services and utilities (e.g., fire protection, police protection, water, schools, solid waste collection and disposal, storm drainage, wastewater collection, treatment, and disposal, etc.), would ensure that the proposed development would not endanger, jeopardize, or otherwise constitute a hazard to the public health, safety, or general welfare, or injurious to the property or improvements in the vicinity and base zoning district in which the property is located.

The Project is a new 191,394-square-foot warehouse building. The Environmental Impact Report (EIR) prepared for the Project identifies the potential for significant effects on the environment from development of the Project, all of which can be reduced through implementation of mitigation measures to a level of insignificance. The Project, as well as future projects in the Specific Plan Area, will be required to adhere to all development standards, ensuring new development does not adversely impact public health, safety, or general welfare. The Project is compatible with other uses in the vicinity, the majority of which are warehousing and light industrial uses.

3. The proposed development would:
   a. Ensure quality development by encouraging greater creativity and aesthetically pleasing designs for the individual components of the development and the development as a whole;
   b. Ensure the timely provision of essential public services and facilities consistent with the demand for the services and facilities; and
   c. Promote a harmonious variety of housing choices and commercial and industrial activities, if applicable; attain a desirable balance of residential and/or employment opportunities; and result in a high level of amenities and the preservation of the natural and scenic qualities of open space.

   The Specific Plan includes design guidelines, development regulations, and infrastructure plans which ensure quality development and the provision of essential public services and facilities. The amendment removes the maximum building square footage limitation within the Specific Plan area; however, the maximum floor area ratio requirement remains. This requirement, along with other development standards, ensures the amendment does not impact the Specific Plan's provisions for public services and quality development. The Specific Plan allows for a variety of commercial and industrial uses, consistent with the intent for the Cypress Business Park, as outlined in the General Plan.

4. The subject site is:
   a. Physically suitable for the proposed land use designation(s);
   b. Physically suitable for the type and density/intensity of development being proposed;
   c. Adequate in shape and size to accommodate the proposed development; and
   d. Served by streets adequate in width and pavement type to carry the quantity and type of traffic expected to be generated by the proposed development.

   The amendment allows light industrial and warehousing uses within the eastern portion of Planning Area 1 of the Specific Plan. This change in allowable uses is suitable because light industrial uses are already permitted in the western portion of Planning Area 1 and the area is bordered by other light industrial uses to the north, east, and west. Although the amendment removes the maximum permitted square footage requirement for the Specific Plan area, the floor area ratio requirement remains in place, ensuring that the intensity of development is suitable

for the area and consistent with the General Plan. The site is adequate to meet all development standards that apply to the Project. The EIR for the Project included a traffic analysis which found that the Project will not have significant impacts on traffic or nearby streets and intersections with the implementation of the recommended mitigation measures and project conditions.

SECTION 3. Subsection A (Project Summary) of Chapter I (Summary) of the McDonnell Center Specific Plan is hereby revised as follows (additions in **bold underline**; deletions in ~~**bold strikethrough**~~):

A. Project Summary

A specific plan was prepared for the McDonnell Center in 1982; this Specific Plan represents an amendment to the 1982 document, superseding the 1982 document. Land uses consist of mixed use business park/office, mixed use business park, office, and office/commercial uses in six planning area; four planning areas are affected by this amendment. The amended specific plan consists of the revision of the original specific plan to include the proposed addition of 206,130 square feet of commercial uses to the maximum of 1,554,100 square feet allowed by the 1982 Specific Plan and EIR; this would increase the total allowable square footage to 1,760,230 square feet. Currently, approximately 530,870 square feet of allowable uses have not yet been developed.

The square footages listed in this section and Table 1 (Land Use Summary) are a summary of existing and planned development in the Specific Plan area at the time the amended specific plan was adopted (1994). The square footages shall not serve as a maximum developable area for any Planning Area or for the entire Specific Plan. Development shall not exceed a maximum floor area ratio (FAR) of 1.0:1 to maintain consistency with the General Plan.

This amended Specific Plan incorporates and replaces the original 1982 Specific Plan. The following is a summary of the land uses in the amended specific plan:

TABLE 1
LAND USE SUMMARY

Land Use	Acres	Building Area
Industrial/Warehouse	23.94	699,653
Office	33.31	831,761
Commercial	7.42	228,816
Total (net)	***64.67***	***1,760,230***
Roads/Rights of Way	6.56	
Total (gross)	**71.23**	**1,760,230**

SECTION 4. Subsection B (Land Use Plan) of Chapter III (Development Plan) of the McDonnell Center Specific Plan is hereby revised as follows (additions in **bold underline**; deletions in ~~**bold strikethrough**~~):

B. Land Use Plan

The land use plan for the McDonald center amended specific plan consists of the intensification of four planning areas adding 206,130 square feet of new development to the 530,870 square feet of undeveloped area remaining under the approved plan (see Exhibit 3, *Land Use Plan*, and Table 2, *Land Use Statistics*). The following summarizes the changes from the original 1982 specific plan.

Original Specific Plan Maximum Intensity	1,554,100 square feet
Developed Area within original Specific Plan	1,023,230 square feet
Remaining Undeveloped Area under Approved Plan	530,870 square feet
Amendment to Specific Plan (net increase)	206,130 square feet
Total to be Developed	737,000 square feet
Ultimate Total in Specific Plan Area	1,760,230 square feet

The square footages listed in this section and Table 2 (Land Use Statistics) are a summary of existing and planned development in the Specific Plan area at the time the amended specific plan was adopted (1994). The square footages shall not serve as a maximum developable area for any Planning Area or for the entire Specific Plan. Development shall not exceed a maximum floor area ratio (FAR) of 1.0:1 to maintain consistency with the General Plan.

Planning areas which are to be developed under the amendment comprise a total of 737,000 square feet and include the following land uses:

Area 1, Industrial/Warehouse: Planning Area 1 is located in the northwestern corner of the site on Walker Street. The eastern portion of this area has been developed as office use; the western portion is proposed for use as a 210,000 square-foot industrial/ warehouse use. The area will take access through secondary access driveways on Walker Street to the west.

Area 4, Commercial: Planning Area 4 is located on the southeast corner of the Center at the intersection of Valley View Street and Katella Avenue. The site to be developed is sandwiched between two existing commercial uses in Planning Area 4: the Ramada Inn to the west, and the El Torito Restaurant to the east. The site is intended for use as a 9,000 square foot restaurant although other commercial uses which support the businesses of the Center are permitted. Access to the site will be through a driveway

connection with Plaza Drive and a secondary access driveway on Katella Avenue.

Area 5, Office: Planning Area 5 is located in the south central portion of the project area, fronting on Katella Avenue. The eastern portion of the Planning Area has been developed as an office use with a parking lot in the area proposed for additional office use. The proposed development of the site would consist of construction of a 150,000 square foot, six story office building and a parking structure to provide parking for the existing use and the new building. Access will be through a secondary access driveway on McDonnell Drive and through internal connections with the existing use.

Area 6, Office/Commercial: Planning Area 6 is located on the southwestern corner of the project area at the intersection of Katella Avenue and Walker Street. The site is currently vacant. The planning area is planned for 368,000 square feet of office uses with supporting commercial retail uses. This area includes a 10,000 square-foot childcare facility for the employees of the businesses within the planning area. The design intent of the planning area is the creation of a campus style office development, utilizing several office and commercial buildings designed as an integrated whole. This may include the development of a central plaza space to link the buildings (see the conceptual design concept in Exhibit 8, Conceptual Site Plan for a possible design scenario). A parking structure will accommodate the parking needs for the Planning Area uses. Access will be through Douglas Drive and secondary driveways on Katella Avenue and Walker Street.

SECTION 5. Subsection C.4 of Chapter V (Development Regulations) of the McDonnell Center Amended Specific Plan is hereby revised as follows (additions in **bold underline**; deletions in ~~**bold strikethrough**~~):

4. Industrial/Warehouse: Planning Areas 1 and 2, as identified on the Land Use Plan

Intent: This use is intended for warehousing and associated light industrial uses within Planning Area**s 1 and** 2 ~~**and the western portion of Planning Area 1**~~ of the Specific Plan.

SECTION 6. Subsection C.4 of Chapter VI (Implementation) of the McDonnell Center Specific Plan is hereby revised as follows (additions in **bold underline**; deletions in ~~**bold strikethrough**~~):

4. Minor Development Standards Adjustments

The purpose of a Minor Specific Plan Development Standard Adjustment procedure is to provide a simplified means of considering minor deviations from certain development standards set forth in the Specific Plan which are not detrimental to the public health, safety, or welfare. Any person, firm, corporation or other entity may apply in writing to the Planning Director for a minor development standard determination in the provisions

contained in this Specific Plan. Applications for minor adjustments shall be limited to any of the following:

- A reduction in lot, yard or building area requirements by not more than ten percent (10%) of that otherwise specified in this Specific Plan.

- ~~**A transfer of building floor area between planning areas provided there is no net increase in the total permitted building floor area and no increase in traffic generation.**~~

- A reduction in parking requirements by not more than ten percent (10%).

- A minor modification to Architectural or Landscape Architecture Guidelines contained in Section IV or the Landscape Standards in Section V.

The decision of the Planning Director may be appealed to the City Council in accordance with Section 18.5 of the Municipal Code.

SECTION 7. The map in Exhibit 3 (Land Use Plan) of the McDonnell Center Specific Plan is hereby replaced with the map included as Attachment A of this ordinance.

SECTION 8. Severability. Should any provision of this Ordinance, or its application to any person or circumstance, be determined by a court of competent jurisdiction to be unlawful, unenforceable or otherwise void, that determination shall have no effect on any other provision of this Ordinance or the application of this Ordinance to any other person or circumstance and, to that end, the provisions hereof are severable. The City Council of the City of Cypress declares that it would have adopted all the provisions of this Ordinance that remain valid if any provisions of this Ordinance are declared invalid.

SECTION 9. Effective date. This Ordinance shall become effective thirty (30) days from its adoption.

SECTION 10. Certification. The Mayor shall sign and the City Clerk shall certify to the passage and adoption of this Ordinance and shall cause the same to be published and posted pursuant to the provisions of law in that regard.

PASSED, APPROVED and ADOPTED by the City Council of the City of Cypress at a regular meeting held on the 18th day of November, 2024.

_____
MAYOR OF THE CITY OF CYPRESS

ATTEST:

_____
CITY CLERK OF THE CITY OF CYPRESS

STATE OF CALIFORNIA)
COUNTY OF ORANGE)SS

I, ALISHA FARNELL, City Clerk of the City of Cypress, DO HEREBY CERTIFY that the foregoing Ordinance was duly adopted at a regular meeting of the said City Council held on the ___ day of _____, 2024, by the following roll call vote:

AYES: COUNCIL MEMBERS:
NOES: COUNCIL MEMBERS:
ABSENT: COUNCIL MEMBERS:

_____
CITY CLERK OF THE CITY OF CYPRESS

RESOLUTION NO.

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CYPRESS, CALIFORNIA, APPROVING SITE PLAN REVIEW NO. 2024-01, FOR A 191,394 SQUARE-FOOT WAREHOUSE BUILDING AND ASSOCIATED PARKING AND LANDSCAPING AT 5665 PLAZA DRIVE IN THE MCDONNELL CENTER SPECIFIC PLAN, IN THE CITY OF CYPRESS, CALIFORNIA.

WHEREAS, the City Council of the City of Cypress has considered an application submitted by GLC Cypress, LLC ("Applicant") for a new 191,394 square-foot (sf) warehouse building and associated parking and landscaping at 5665 Plaza Drive in the McDonnell Center Specific Plan (the "Project"); and

WHEREAS, the Project requires the following to be approved by the City Council: an amendment to the McDonnell Center Specific Plan (Specific Plan Amendment No. 2024-01) and a Site Plan Review (SPR No. 2024-01); and

WHEREAS, an application was filed for approval of a Site Plan Review for the Project in accordance with the provisions of Section VI.C of the McDonnell Center Specific Plan ("Specific Plan"); and

WHEREAS, the City Council has reviewed the goals and objectives of the General Plan as laid out in the City Council staff report dated November 12, 2024 and November 18, 2024, and finds that the Project is consistent with the intent of the General Plan; and

WHEREAS, in accordance with the California Environmental Quality Act (CEQA), an Environmental Impact Report (EIR) was prepared for the Project and released to the public on August 12, 2024, for a 45-day review period. All required notifications were provided pursuant to CEQA (Public Resources Code Sections 21080.4 and 21161; Guidelines Sections 15082 and 15085) and all comment letters were incorporated into the Final EIR. The City Council has certified the EIR and made all required CEQA findings under separate resolution adopted concurrently herewith; and

WHEREAS, on November 12, 2024, the City Council held a duly noticed public hearing where the item was continued to November 18, 2024 and considered testimony on the application; and

WHEREAS, the City Council finds that the applicant agrees with the necessity of and accepts all elements, requirements, and conditions of this Resolution as being a reasonable manner of preserving, protecting, providing for, and fostering the health, safety, and welfare of the citizenry in general and the persons who work, visit or live in this development in particular.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF CYPRESS, CALIFORNIA, DOES HEREBY RESOLVE, based upon substantial evidence taken from the administrative record and at the public hearing, AS FOLLOWS:

SECTION 1. The City Council hereby specifically finds that all the facts set forth in the above Recitals are true and correct and are incorporated herein as findings of the City Council.

SECTION 2. Findings. Pursuant to the Section VI.C.6 of the Specific Plan, the City Council finds, after due study and deliberation that the following circumstances exist:

1. The proposed project is compatible with the intent and purpose of the Specific Plan.

   With approval of the specific plan amendment, the Project is compatible with the intent and purpose of the McDonnell Center Specific Plan. The amendment removes the maximum square footage requirement and expands warehousing and light industrial uses into the eastern portion of Planning Area 1, where the project is located. These changes further the Specific Plan's goal to provide "flexible development guidelines which will accommodate future market trends and tenant needs, without sacrificing the intended high-quality character of the project". With approval of the conditions included in Exhibit "A", the project maintains the cohesive nature of the Specific Plan area in regards to landscaping, access, and other factors.

2. Development of the Site Plan will not have an adverse impact on the public health, safety, interest, convenience, or the general welfare.

   With approval of the conditions included in Exhibit "A", the Project will not be materially detrimental to the public health, safety or general welfare. Further, the Environmental Impact Report found the Project had a less than significant impact with the implementation of the required mitigation measures included in the Mitigation Monitoring and Reporting Program (MMRP).

3. The Site Plan is compatible with the intent and purpose of the regulations and design guidelines of the McDonnell Center Specific Plan.

   With approval of the Specific Plan Amendment and the conditions included in Exhibit "A", the Project meets all the development standards required by the McDonnell Center Specific Plan. The architectural design of the warehouse is consistent with the Specific Plan design guidelines in that it incorporates a variety of materials, an enhanced building entrance, and a contemporary style. The Project landscaping will enhance the site and maintain the aesthetic standards of the Specific Plan area.

NOW, THEREFORE, BE IT FURTHER RESOLVED that the City Council of the City of Cypress hereby approves Site Plan Review No. 2024-01, subject to the applicable

conditions included in Exhibit “A”. The decision of the City Council is final and conclusive as to all things involved.

PASSED, APPROVED and ADOPTED by the City Council of the City of Cypress at a regular meeting held on the 18th day of November, 2024.

_____
MAYOR OF THE CITY OF CYPRESS

ATTEST:

_____
CITY CLERK OF THE CITY OF CYPRESS

STATE OF CALIFORNIA)
COUNTY OF ORANGE)SS

I, ALISHA FARNELL, City Clerk of the City of Cypress, DO HEREBY CERTIFY that the foregoing Resolution was duly adopted at a regular meeting of the said City Council held on the 12th day of November, 2024, by the following roll call vote:

AYES: COUNCIL MEMBERS:
NOES: COUNCIL MEMBERS:
ABSENT: COUNCIL MEMBERS:

_____
CITY CLERK OF THE CITY OF CYPRESS

EXHIBIT "A"

PROJECT TITLE: SPR NO. 2024-01

ADDRESS: 5665 PLAZA DRIVE

CONDITIONS OF APPROVAL

1. General Conditions

1.1. Unless and until the project applicant and property owner sign and return a City-provided affidavit accepting these conditions of approval, there shall be no entitlement of the application. The project applicant and property owner shall have 15 calendar days to return the signed affidavit to the Community Development Department. Failure to do so will render City Council action on the application void. *(Planning)*

1.2. This permit is granted for the plans dated January 8, 2024, ("the plans") on file with the Planning Division. The project shall conform to the plans, except as otherwise specified in these conditions, or unless a minor modification to the plans is approved by the Planning Director. A minor modification may be granted for minimal changes or increases in the extent of use or size of structures or of the design, materials or colors of structures or masonry walls. *(Planning)*

1.3. The applicant shall defend, indemnify, and hold harmless, the City and any agency thereof, or any of its agents, officers, and employees from any and all claims, actions, or proceedings against the City or any agency thereof, or any of its agents, officers or employees, to attack, set aside, void or annul, an approval of the City, or any agency thereof, advisory agency, appeal board, or legislative body, including actions approved by the voters of the City, concerning the project, which action is brought within the time period provided in Government Code Section 66499.37 and Public Resources Code, Division 13, CH. 4 (§ 21000 et seq. - including but not by way of limitation § 21152 and 21167). City shall promptly notify the applicant of any claim, action, or proceeding brought within this time period. *(City Attorney)*

1.4. The applicant's contractor shall provide the City with a Certificate of Insurance on City form evidencing a comprehensive liability insurance policy with a combined single limit of not less than $500,000 each occurrence in connection with the work performed. Certificate shall include the City, its Council, officers, members of boards or commissions and employees as additional Named Insureds with respect to all claims, actions, damages, liabilities and expenses, including attorney's fees, arising out of or in connection with the work to be performed under the development executed by the Named Insured and City, including any act or omission of employees, agents, subcontractors, or their employees. Such certificate shall have a 30 day cancellation notice to the City of Cypress. *(City Attorney)*

1.5. Any and all correction notice(s) generated through the plan check and/or inspection process is/are hereby incorporated by reference as conditions of approval and shall be fully complied with by the owner, applicant and all agents thereof. *(Planning)*

1.6. All requirements of the Orange County Fire Authority (OCFA), Orange County Health Department, and Cypress Building and Safety Division shall be satisfied prior to commencement of the business operation. *(Planning)*

1.7. The applicant shall obtain a Cypress business license prior to commencement of the business operation. *(Finance)*

1.8. All applicable conditions of the project shall be complied with prior to occupancy of the subject building. *(Planning)*

1.9. The applicant may request minor modifications of conditions of approval consistent with the intent of the project approval. The modification must be approved in writing by the Planning Director (Conditions of Approval Sections 1-8), City Engineer (Conditions of Approval Sections 9-22 and 24), and the Police Chief (Conditions of Approval Section 23).

2. Planning

2.1. Areas subject to vehicle loading, including internal streets, driveways, etc., shall consist of Portland Cement Concrete (PCC) unless an alternative material is approved in the project WQMP for infiltration purposes. *(Planning)*

2.2. At least two weeks prior to the issuance of the certificate of occupancy, the applicant shall meet with the project planner and members of the Building and Engineering Divisions to ensure that all applicable conditions of approval have been satisfied. *(Planning)*

2.3. Developer shall submit both a lighting plan showing standard heights and light materials and a photometric plan showing light levels on site and at the adjacent property limits, for design review and approval of the Planning Director. *(Planning)*

2.4. All exterior portions of the site, during the hours of darkness, shall be illuminated with a minimum of one foot-candle of light. In order to minimize light and glare on the project property and adjacent properties, all parking lot and exterior structure light fixtures shall be high cut-off type that divert lighting downward onto the property and shall not cast light on any adjacent property or roadway. Illumination levels at the property lines shall not exceed .5 foot candles. *(Planning)*

2.5. Project on-site lighting shall be of a type and in a location that does not constitute a hazard to vehicular traffic, either on private property or on adjoining streets. To

prevent damage from vehicles, standards in parking areas shall be mounted on reinforced concrete pedestals or otherwise protected. Developer shall recess or conceal under-canopy lighting elements so as not to be directly visible from a public street. *(Planning)*

2.6. That no vending machines, publication racks, telephones, kiosks, donation bins and similar items shall be permitted outside of the buildings. *(Planning)*

2.7. The easement restricting parking in the 60-foot wide strip on the northern edge of the site shall remain in effect so long as the area is zoned PS-1A. Parking stalls located within the PS-1A zone shall be available for public use from 7:00 p.m. to 6:00 a.m., Monday through Friday, and all day on Saturday and Sunday. *(Planning)*

2.8. Signs shall be installed and maintained at the entrances to the site and within the easement referenced above indicating that the parking area within the easement is available for public parking from 7:00 p.m. to 6:00 a.m., Monday through Friday, and all day on Saturday and Sunday. *(Planning)*

2.9. Third Party Logistics uses are prohibited within the building. Third Party Logistics refers to business entities that provide short-term storage and fulfillment services for finished consumer goods.

2.10. Class 8 trucks providing deliveries to and from the project site shall be directed to access and depart the site via Douglas Drive to Katella Avenue, connecting directly to the I-605 Freeway.

3. Mitigation Measures

3.1. Prior to issuance of any grading or building permit associated with implementation of the project, the applicant shall demonstrate compliance with the adopted Mitigation Monitoring and Reporting Program (MMRP), to the satisfaction of the Community Development Department. *(Planning)*

3.2. A copy of the approved Conditions of Approval including Table 6.A Mitigation Monitoring and Reporting Program from the approved Environmental Impact Report, shall be included in all development plans submitted to the City. *(Planning)*

3.3. The applicant shall conduct outreach to all property owners and tenants in properties adjacent to the project site property lines to discuss schedule, duration, and to identify the appropriate contacts for future communication, start date, expected duration, concerns or complaints. *(Planning)*

3.4. A “disturbance coordinator” shall be established. The disturbance coordinator will

be responsible for responding to any local complaints about construction noise and/or ground vibration. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures to reduce noise levels. All signs posted at the construction site shall list the telephone number for the disturbance coordinator.

3.5. Subject to approval of a Temporary Use Permit, permitted hours of construction for grading and ground improvement activities may be modified to 2 pm through 10 pm seven days a week including 8 am to 5 pm on Sundays. Complaints received regarding ground improvement activities occurring past 8 pm, will be evaluated by the Community Development Director and at their discretion, the temporary use permit will be modified as required. *(Planning)*

3.6. A sign, legible at a distance of 50 feet, shall be posted at the construction site perimeter. All notices and the signs shall indicate the dates and duration of ground improvement activities, as well as provide a telephone number for the "disturbance coordinator.

3.7. The applicant shall prepare a list of parties contacted and share any written communication with Planning, Code Enforcement, and Public Works.

3.8. The Applicant's DDC construction contractor shall develop a vibration monitoring and construction contingency plan for approval by the City's Director of Community Development, or designee, to identify appropriate locations in the vicinity of nearby structures where monitoring will be conducted; set up a vibration monitoring schedule; define structure-specific maximum vibration limits based on building inspections; contain provisions to conduct building surveys to document existing conditions at adjacent structures. The plan shall identify construction contingencies that would be implemented if vibration levels approach the established vibration limits at a particular location.

3.9. Should the applicant utilize deep dynamic compaction ground improvement methods the applicant shall:

- Applicant's structural engineer shall inspect adjacent structures located within 120' of site areas being improved with DDC to assess structural integrity and evaluate the ability for each structure to endure vibration and lateral acceleration without damage.

- Applicant's ground improvement contractor will install seismic monitoring calibrated to alarm when thresholds are exceeded (maximum .5 in/per sec in PPV threshold).

- Further mitigation measures shall be implemented should vibration exceed the

.5 in/per sec in PPV threshold (sequence of methods to reduce impact) to reduce the threshold to acceptable levels such as:

- Dig a trench along north PL to cut off seismic wave and
- Determine distance from north PL where ground acceleration is reduced to acceptable levels.

- For all areas where vibration cannot be reduced to acceptable levels (.5 in/per sec in PPV threshold), Vibratory Stone Columns shall be used instead.

3.10. The applicant will work closely with the City Staff and adjacent property owners to immediately address complaints due to vibration and modify operations to minimize perceived or actual impacts. If the City receives two-verified complaints after the implementation measures outlined in Section 3.9, the balance of the project shall utilize Vibratory Stone Columns (VSC).

4. Architectural

4.1. Architectural elevations and site plans shall be reviewed and approved by the Community Development Department prior to the issuance of building permits.

4.2. All architectural treatments shall be constructed as illustrated on plans and renderings submitted. The final exterior color scheme shall be submitted to City staff for review and approval prior to actually painting the structure. *(Planning)*

4.3. All roof mounted equipment, such as heating and air conditioning units, shall be adequately screened from public view by a parapet wall of equal or greater height than the highest piece of roof mounted equipment or vent, subject to the approval of the Community Development Department. *(Planning)*

4.4. The transformer boxes and water valves shall be placed in locations acceptable to the Director of Planning and shall be adequately screened from view with plant materials. *(Planning)*

4.5. During construction, the developer shall provide an adequate number of trash bins at a location acceptable to City staff. Construction bins must be maintained onsite. Bin rental shall be contracted through the City's disposal services contractor. *(Planning)*

5. Signage

5.1. A comprehensive sign program for both building and freestanding monument signs shall be submitted for Community Development Department approval prior to the installation of any signs. The developer shall not erect or display on the subject

property any signs which have not been approved in writing by the Community Development Department. *(Planning)*

5.2. The installation and method of sign illumination shall be reviewed and approved by the Planning Division and the Building and Safety Division. The business owner shall take the appropriate measures to ensure that the illumination of the sign shall not create glare for vehicular traffic. All electrical conduits, timer devices, and other electrical equipment shall be buried underground or concealed within the sign. *(Planning) (Building and Safety)*

6. Landscaping

6.1. To the extent feasible and subject to Planning Director approval, the site shall be landscaped in compliance with the McDonnell Center Specific Plan, including landscape requirements for parking areas and setback areas. *(Planning)*

6.2. A detailed landscape and automatic irrigation plan shall be submitted to the Planning Division for review and approval at least 60 days prior to issuance of a certificate of occupancy. In addition, a bond shall be posted with Public Works to guarantee against defects in plant materials and workmanship for a period of one year from acceptance of the landscape installation. All required landscaping shall be permanently maintained in a neat and orderly condition and comply with the provisions of Section IV.D. (Design Concept, Landscape Guidelines) and Section V.H. (Development Regulations, Landscape). *(Planning) (Public Works)*

6.3. All new or revised landscape areas shall comply with the City's water efficiency ordinance as well as the water efficient requirements of the Cypress Zoning Code and the City's Drought Response Management Plan. All new or revised irrigation shall be provided by a drip or microspray system. *(Planning)*

6.4. Landscape irrigation pipes and sprinkler heads shall be maintained in good working order so as to cover all landscaped areas. *(Planning)*

6.5. All trees required to be removed to install the sidewalk along Plaza Drive shall be replaced. The tree species shall be consistent with the McDonnell Center Specific Plan Design Concept (Section IV.D), and subject to Planning Director approval. Replacement trees shall be a minimum of 24" box size. *(Planning)*

7. Operational

7.1. All business activity shall occur within the building except for the loading and unloading vehicles which shall occur in the loading docks as indicated on the approved plans. Temporary use permits may be granted for outdoor activity in accordance with Section 19, of the Cypress Zoning Ordinance. *(Planning)*

7.2. The parking lot shall be used solely for vehicular parking, unless otherwise approved in writing by the Planning Director. *(Planning)*

8. Property Maintenance

8.1. Continuous Maintenance. The Project property owner shall continually maintain the property so that it is visually attractive and not dangerous to the health, safety and general welfare of both on-site users (e.g. employees) and surrounding properties. The property owner shall ensure that all facets of the development are regularly inspected, maintained and that any defects are timely repaired. Among the elements to be maintained, include but are not limited to:

a. All walls, fences, and trash enclosures shall be maintained free of significant surface cracks, dry rot, warping, missing panels or blocks, which threaten the structure's structural integrity.
b. Parking lot surfaces and pedestrian walkways shall be maintained in a safe condition such that any concrete, asphalt, or other driving or walking surfaces are free of potholes, buckled or cracked surfaces, or raised areas.
c. The property shall be maintained free of the accumulation of trash and debris. Trash and debris associated with the business operation shall be stored solely in designated trash enclosures.
d. Exterior building elevations shall be maintained such that buildings are free from broken, missing, or significantly cracked surface finished materials.
e. Signage. The developer shall maintain all on-site signs, including posted area signs (e.g. "No Trespassing") in a clean readable condition at all times. The developer shall remove all graffiti and repair vandalism on a regular basis.
f. Lighting. The developer shall maintain any lighting so that they operate properly for safety purposes and do not project onto adjoining properties or roadways.
g. Parking and on-site circulation. The developer shall maintain all parking and on-site circulation requirements, including surfaces, all markings and traffic/directional signs in an un-faded condition as identified on the approved site plan. *(Planning)*

8.2. The property owner shall maintain the site, the publicly accessible interior, and publicly viewable exterior of the building(s) clear of all graffiti, including but not limited to bathrooms and dining areas if applicable. All graffiti shall be removed within 48 hours once notified in writing by the City. *(Planning)*

9. Fees

9.1. As applicable, the applicant shall pay the following fees per the adopted Master Fee resolution, as noted below. *(Engineering)*

- Park and Recreation (Prior to issuance of Building Permit)
- Drainage Fee for Master Drainage Plan (Prior to issuance of Building Permit)
- City-wide Traffic Improvement (Prior to issuance of Building Permit)
- Regional Traffic Improvement (Prior to issuance of Building Permit)
- Final Subdivision Map Check (Prior to submittal of Map)
- Sanitary Sewer Connection (Prior to issuance of Building Permit)
- Grading / On-Site (Non-Structural) Plan Check (Prior to submittal of Grading Plans)
- Grading Permit and Inspection (Prior to Permit issuance)
- Building Plan Check (Prior to submittal of Plans)
- Building Permit and Inspection (Prior to Permit issuance)
- Public Improvement Plan Check (Prior to submittal of Plans)
- Public Improvement Permit and Inspection (Prior to Permit issuance)

Within 48 hours of the approval of this project, the applicant/developer shall deliver to the Community Development Department the required Fish and Wildlife impact fee in the form of a check payable to the **County Clerk-Recorder** in the amount required by the County, to enable the City to file the Notice of Determination pursuant to Fish and Game Code §711.4 and California Code of Regulations, Title 14, section 753.5. *(Planning)*

10. Engineering

10.1. That all engineering requirements of the City of Cypress, including preparation of improvement plans and installation of all improvements such as curbs and gutters, sidewalks, street grading and pavement, sewer and drainage facilities, or other appurtenant work shall be complied with as required by the City Engineer and in accordance with specifications on file in the Office of the City Engineer, as may be modified by the City Engineer; and, that security in the form of two (2) Offsite Improvement bonds (faithful performance and labor and materials), certificates of deposit, letters of credit, completion guarantees, or cash, each in an amount equal to 100% of the engineer's cost estimate and form satisfactory to the City of Cypress, shall be posted with the City to guarantee the satisfactory completion of said improvements. Said security shall be posted with the City prior to the issuance of a building permit to guarantee the installation of the related improvements prior to final building and zoning inspections in accordance with an approved construction phasing plan. In the event the developer's contractor and/or subcontractor fails to diligently prosecute the work within the public right-of-way, the City reserves the right, in its reasonable discretion, to issue a stop work notice and to provide a substitute contractor and/or subcontractor to complete said work at the sole cost and expense of developer. *(Engineering)*

10.2. The applicant shall submit all public improvement plans per the Public Works Standard Plans and specified design criteria. All plans shall be submitted in an

acceptable digital format and one copy printed on mylar with the City title block on all sheets. *(Engineering)*

10.3. Prior to any street construction or relocation, when there are monuments in the project area which control the location of subdivisions, streets or highways, or provide survey control, the developer shall locate and reference the monuments and shall reset them after construction as required by Section 8771 of the Business and Professions Code, in a manner meeting the approval of the City Engineer. *(Engineering)*

10.4. The applicant shall notify the City Engineer through submittal of a revised plan if any changes to the site plan are proposed during the plan check process. Permits shall not be issued until the City Engineer has reviewed and approved the proposed changes for conformance with the intent of the City Council's action and the conditions herein. If the proposed changes are of a substantial nature, an amendment to the original entitlement may be required. *(Engineering, Planning)*

10.5. The applicant shall make all submittals, including engineering, building, grading, water quality, and inquiries through the department's online plan check and permit application at https://cypressca.viewpointcloud.com or as determined by the City Engineer. *(Engineering)*

10.6. Prior to issuance of a temporary or final certificate of occupancy, the applicant shall record all easements (reciprocal access, emergency access, etc.) necessary to provide access to the property and building(s) for emergency services. *(Engineering)*

11. Landscaping within the Public Right-of-Way

11.1. Prior to or with the submittal of building plans, the applicant shall submit a street landscaping and irrigation plan within the public right-of-way to the City Engineer for approval. The subject landscaping and irrigation plans shall be designed to be in conformance with the City's water efficient landscape ordinance. *(Engineering, Maintenance)*

11.2. The applicant shall post a Landscape bond, equal to 100% of the cost estimate, to guarantee against any defects in plant materials and workmanship. The applicant shall submit a soils report for all planting areas, prepared by a qualified agricultural laboratory to the City Engineer for approval at least 30 days prior to planting date. Test results shall include concentration of nitrogen, phosphorus, potassium, ph, salinity, sodium status, and boron saturation extract. Drought tolerant landscape is encouraged. The landscaping will be irrigated from the private property meter and the applicant or successor in interest will pay for all water. *(Engineering, Maintenance)*

11.3. Prior to issuance of a temporary or final certificate of occupancy, the applicant shall install all new public right-of-way landscaping and irrigation per the approved street

landscaping and irrigation plan. *(Engineering, Maintenance)*

11.4. The applicant or his successor in interest shall maintain all landscaping planted in the public right-of-way located along the frontage of their property in a healthy and safe condition. *(Engineering, Maintenance)*

12. Sewer and Wastewater

12.1. The developer shall construct new private sewer laterals with cleanouts at a location approved by the City Engineer. *(Engineering)*

12.2. Prior to the issuance of building permits, the applicant shall submit a sewer plan signed and stamped by a registered civil engineer, detailing all the proposed public and/or private sewer lines meeting the requirements of the City Design Standards for Sewer Facilities to be approved by the City Engineer. *(Engineering)*

12.3. All sewer lines within the development shall be private sewer lines and shall be maintained and cleaned by the developer, or successor in interest. The City of Cypress shall have no responsibility for maintenance of the private sewer lines. *(Engineering)*

13. Street Trees

13.1. If trees are planted within the public right of way, they shall be installed in accordance with the approved street landscape plan subject to the approval of the City Engineer. *(Engineering)*

13.2. The applicant or successor in interest shall trim all trees in the public right-of-way along the property frontage on Plaza Drive annually or as prescribed by the City Engineer and maintain the trees in a healthy and safe condition. *(Maintenance)*

14. Street Lighting

14.1. The applicant shall bear the full cost of upgrading the existing street light along the property frontage on Plaza/Douglas Drive to energy efficient LED fixtures. Street lighting shall be approved by the City Engineer and meet the City of Cypress design standards.

15. Streets

15.1. Prior to the issuance of any certificate of occupancy, including temporary, the applicant shall install new sidewalks and driveway approaches that are compliant with the American Disabilities Act along the property frontage on Plaza Drive. The developer shall comply with the following requirements regarding the improvements:

- Within 90 days issuance of any grading or demolition permit, submit plans to

Public Works for both the sidewalk and associated landscaping within the ten-foot parkway strip within the public right of way and obtain approval by the City Engineer.

- Construct all improvements in accordance with Cypress Public Works standards and specifications to satisfaction of the City Engineer.

- Prior to construction, obtain and pay for a permit and inspection services. As part of the permit, submit a bond to guarantee its construction acceptable to the City Engineer and maintain a schedule on file with the City Engineer for the work.

- Sidewalks shall be a minimum width of five feet, clear of all obstructions (including utilities, street lights, fire hydrants, etc).

- Adjust utility vaults and boxes to grade in accordance with the corresponding utility's requirements and standards.

- Relocate any utilities as necessary securing the appropriate approvals from the respective utilities.

- Plant new trees at 1:1 ratio on private property along the property frontage for any tree removed as part of the sidewalk improvements. Submit the size and types of trees and locations for approval to the Planning Director.

- Landscaping within the public right of way parkway strip shall be drought tolerant and water efficient.

- Irrigate all landscaping within the public right-of-way from the private property meter and the developer or successor in interest shall pay for all water.

- The developer or his successor in interest shall maintain all landscaping planted in the public right-of-way located along the frontage of their property in a healthy and safe condition.

- Grant easements to the City for pedestrian purposes for any sidewalk or driveways, as needed, for compliance with ADA requirements prior to issuance of a permit for construction.

15.2. Prior to the issuance of any certificate of occupancy, including temporary, the applicant shall resurface Plaza Drive (2" grind and overlay asphalt concrete pavement) along the project, 5757 and 5755 Plaza Drive frontages. Construct all improvements in accordance with Cypress Public Works standards and specifications to satisfaction of the City Engineer.

15.3. Remove and replace any damaged street, pavement or other concrete improvements as a result of damage due to this work and appropriately clean

the area to the satisfaction of the City Engineer. (Engineering)

15.4. Prior to issuance of a certificate of occupancy, the applicant shall remove and replace any existing public improvements at the development site which have existing damage, are damaged due to construction, or otherwise below current standards, to the satisfaction of the City Engineer. *(Engineering)*

16. Traffic

16.1. The access driveway to the development shall be designed in accordance with City standards and approved by the City Engineer. *(Engineering)*

16.2. The quantity, location, width, and type of public driveways shall be subject to the approval of the City Traffic Engineer. Prior to construction of any driveway approach upon public street right-of-way, the applicant shall obtain a public works permit. *(Engineering)* (Driveways)

16.3. Prior to the issuance of any grading permits, the applicant shall provide adequate sight distance per Engineering Standard Plan 204 and 205 at all street intersections, driveways, and parkways, in a manner meeting the approval of the City Traffic Engineer. The applicant shall make all necessary revisions to the plan to meet the sight distance requirement such as removing slopes or other encroachments from the limited use area in a manner meeting the approval of the City Engineer. *(Engineering)* (Sight Distance)

16.4. The applicant shall bear the full cost of the traffic signal modification improvements at the intersection of Katella Avenue and Douglas Drive/Warland Drive. The improvements shall consist of installation of a new southbound vehicle signal head on an existing pole in the northwest corner. The City will construct the improvements. Prior to the issuance of any certificates of occupancy, the applicant shall settle all payments related to this improvement. All costs for the improvements including, but not limited to, design (city to hire/manage design engineer), construction, construction management, permitting and inspection shall be the sole responsibility of the applicant. *(Engineering)*

16.5. Any proposed land uses which generate trips in excess of those analyzed in the “Goodman Commerce Center Traffic Analysis” dated January 11, 2024 shall be prohibited until a reassessment is performed and, potentially, additional traffic improvements are completed. *(Engineering)*

17. Utilities

17.1. Prior to issuance of a certificate of occupancy, the applicant shall install all new utility services underground. *(Engineering)*

17.2. Arterials shall be crossed by boring only. In public streets, lateral open cuts

spaced within 20 feet of each other shall be covered with a one-inch continuous asphalt concrete cap. *(Engineering)*

19. Drainage

19.1. Prior to issuance of grading permits at the direction of the City Engineer, the applicant shall submit a grading plan for approval signed and stamped by a registered California civil engineer and using actual grades from an Orange County Surveyor's Benchmark. *(Engineering)*

The applicant shall ensure the following requirements are met:

- Drainage is solved to the satisfaction of the City Engineer and Building Official.
- The Grading Plan is consistent with the Water Quality Management Plan, Site Plan and any Improvement Plan for proposed public storm drains.
- Submittal of a Preliminary Grading Plan if deemed necessary by the City Engineer.
- The topography of the area surrounding this development shall be made to establish existing drainage flow patterns.
- The minimum slope standards are met for 1% for landscape areas, AC parking areas 1.5%, Concrete .2%.
- All surface runoff and subsurface drainage directed to the nearest acceptable drainage facility, as determined by the City Engineer.
- Drainage facilities discharging onto adjacent property shall be designed to imitate the manner in which runoff is currently produced from the site or alternatively, the applicant may obtain a drainage acceptance and maintenance agreement, suitable for recordation, from the owner of said adjacent property.
- All drainage facilities must be consistent with the County of Orange Grading Ordinance as supplemented by the Engineering Division and Local Drainage Manual.

20. Storm Water Quality – National Pollutant Discharge Elimination System

20.1 Development must be undertaken in accordance with conditions and requirements of the Santa Ana Region National Pollutant Discharge Elimination System (NPDES) Permit Order No. R8-2009-0030 as amended by Order No. R8-2010-0062.

20.2 Prior to the issuance of any grading or building permits, the applicant shall submit for review and approval by the City Engineer, a Water Quality Management Plan (WQMP). The WQMP must include best management practices for source control, pollution prevention, site design, and low impact development as well as structural treatment controls among many factors. Site design for controlling urban runoff must first evaluate infiltration, then harvest and water re-use, then evapotranspiration and only bio-treatment if the other three are not feasible. The WQMP must identify the routine structural and non-

structural measures specified in the current Drainage Area Management Plan (DAMP) and utilize the Orange County Technical Guidance Document (OC TGD) as well as the Model WQMP.

Applicable WQMP projects must also:

- Utilize the City's current WQMP template;
- Utilize the City's online WQMP application system for submittal;
- Address site Design BMPs (as applicable) such as minimizing impervious areas, maximizing permeability, minimizing connected impervious areas, creating reduced or zero discharge areas, and conserving natural areas;
- Incorporate Routine Source Control BMPs as defined in the DAMP;
- Include post-construction Treatment Control BMP(s) as defined in the DAMP;
- Include and Operations and Maintenance (O&M) Plan that (1) describes the long- term operation and maintenance requirements for pos-construction Treatment Control BMP(s); (2) identifies the entity that will be responsible for long-term operation and maintenance of the referenced Treatment Control BMP(s); (3) describes the mechanism for funding the long-term operation and maintenance of the references Treatment Control BMP(s); (4) includes the Water Quality Implementation Covenant and Agreement.

20.3 Prior to issuance of and grading or building permits, the applicant must submit a certified copy of the approved Final Water Quality Management Plan (WQMP) along with the final approved Grading Plan and all other supporting documentation on a USB flash drive in a single digital file (pdf) format acceptable to the City Engineer. The Preliminary WQMP Submittal and subsequent approval of the Preliminary Water Quality Management Plan does not guarantee approval of the Final Water Quality Management Plan. Should the final calculations and submittals not meet the required thresholds necessary to meet the obligations of the City under the NPDES Permit for development and its incorporated documents such as the DAMP and OC TGD. alterations to the site and the site plan may be required as prescribed by the City Engineer to the WQMP. Any significant alteration to the site plan due to the Final WQMP may require approval of the Council for the revision. Additionally, the WQMP must identify a responsible party and implement funding sources for maintaining post construction BMPs as required as part of the development and must ensure that appropriate easements and ownerships are properly recorded in public records and access is made available for inspection of said devices.

20.4 The owner is responsible for providing a Water Quality Implementation Covenant and Agreement and an Operations and Maintenance plan that outlines the funding and maintenance of water quality BMPs, consent to inspect, and indemnification on the forms provided by the City for all post-construction stormwater mitigation and treatment devices, as required by the Santa Ana Regional National Pollutant Discharge Elimination System (NPDES) Permit Order No. R8-2009-0030, as amended by Order No. R8-2010-0062. The

agreement will be subject to the review and approval of the City Engineer and City Attorney. Before final acceptance of project improvements, the owner or his/her designated representative must certify that the treatment device was constructed and installed in accordance with the approved plans. Prior to the issuance of a certificate of occupancy, the applicant must demonstrate compliance with the City's NPDES Implementation Program in a manner meeting the satisfaction of the City Engineer and Water Quality Manager, including:

- Demonstrate that all structural Best Management Practices (BMPs) described in the BMP Exhibit from the project's approved WQMP and Maintenance Covenant and Agreement have been implemented, constructed and installed in conformance with approved plans and specifications
- Demonstrate that the applicant has complied with all non-structural BMPs described in the project's WQMP
- Demonstrate that copies of the project's approved WQMP and Covenant and Agreement (with attached O&M Plan) are available for each of the initial occupants
- Agree to provide a compliance deposit to pay for any required inspections and any additional non-compliance inspections as the City deems necessary
- Submit certified record drawings as well as the project engineer's post-construction certification as well as the owner's post construction certification on a template provided by the City
- Agree to pay for an inspection (special investigation) from the City for a date 12 months after the issuance of a certificate of occupancy for the project to verify compliance with the approved WQMP, Maintenance Covenant and Agreement and O&M Plan.
- Demonstrate that the applicant has RECORDED one of the following:

    1. The CC&R's (that must include the approved WQMP, Maintenance Covenant and Agreement and O&M Plan) for the project's Homeowner's Association;
    2. A Water Quality Implementation Covenant and Agreement that has the approved WQMP and O&M Plan attached; or
    3. The final approved Water Quality Management Plan (WQMP) and Operations and Maintenance (O&M) Plan. *(Engineering, Water Quality)* (NPDES/WQMP Compliance Measures)

20.5 All onsite storm drain inlets, whether newly constructed or existing, must be labeled "No Dumping Drains to Ocean" before occupancy in accordance with city requirements.

20.6 All exterior metal building surfaces, including roofs, must be coated with rust-inhibitive paint, or approved equal, to prevent corrosion and release of metal contaminants into the storm drain system prior to occupancy.

20.7 Trash enclosures and/or recycling area(s) must include a structure to cover the enclosure with a solid roof design below to direct stormwater away from entering the enclosure. All litter/waste material must be kept in leak-proof containers. Area(s) must be paved with impermeable material. No other area may drain onto these areas. The trash enclosure and/or recycling area(s) may not drain to the storm drain system and all cleanups must be performed using dry cleanup methods. Trash Enclosures for projects regulated by the current NPDES Permit may be required to design to slope to an interior trapped area floor drain and connected to a pre-treatment device such as an interceptor or clarifier before plumbing to the sanitary sewer system. Additionally, there must be a posted sign on the trash enclosure informing users that hazardous materials are not to be disposed therein. Enclosures for air compressors must include a roof installation similar to trash enclosures, and direct water from entering the enclosure. Additionally, trash enclosures may be required to be modified to meet the current solid waste requirements.

20.8 Any areas, including but not limited to delivery areas/handling docks and outdoor work areas to be utilized for material storage and handling must be covered, constructed on impermeable pavement, designed to eliminate run-on from other areas, and be graded and constructed to prevent runoff from the area Additionally, the development must be designed and constructed with no drain in this area. If these conditions cannot be met, BMPs such as oil/water separators, sand filters, and/or detention basins must be installed to treat all stormwater runoff before it is discharged to the storm drain system. If other areas drain onto the area, treatment for these areas must be included in the design of BMPs. The design must be submitted to the City Engineer for review and approval before the issuance of grading permit.

- *Loading/truck docks are not required to be covered if no material handling/ storage occurs in these areas.*

20.9 Food facilities, including industrial kitchens or bakeries, must be designed with contained areas for cleaning mats, equipment and containers. This wash area must be inside or covered and designed to prevent run-on or runoff from the area. The area may not discharge to the storm drain; indoor or covered area wash waters must drain through a grease interceptor to the sanitary sewer or be collected for ultimate disposal to the sanitary sewer or an authorized location (pumped/trucked offsite). Wash areas located outside must be covered and bermed; wash water must be collected and pre-treated through a grease interceptor and not allowed to drain to storm drain. Additionally, there must be a sign posted instructing that all washing activities be conducted in this area. Employees must be instructed, and signs posted indicating that all washing activities be conducted in this area. Additionally, food facilities are required to obtain a FOG permit through the City's online application and permitting system prior to project close-out and or the issuance of a certificate of occupancy.

20.10 Prior to the issuance of any grading or building permit, the applicant must

submit an Erosion and Sediment Control Plan (ESCP) in a manner meeting approval of the City Engineer and the Building Official and in accordance with requirements of the Santa Ana Regional National Pollutant Discharge Elimination System (NPDES) Permit Order No. R8-2009-0030 as amended by Order No. R8-2010-0062. The ESCP must be developed and implemented to demonstrate compliance with the City's NPDES Implementation Program and State water quality regulations for grading and construction activities. The ESCP must identify how all construction materials, wastes, grading or demolition debris, and stockpiles of soil, aggregates, soil amendments, etc. must be properly covered, stored, and secured to prevent transport into local drainage ways or coastal waters by wind, rain, tracking, tidal erosion or dispersion.

- *Any proposed work in the public right-of-way will require that the ESCP is submitted to the City for review and approval and shall describe how the applicant will ensure that all BMPs will be maintained during construction. The ESCP must be updated as needed to address the changing circumstances of the project site. A copy of the current ESCP must be kept at the project site and be available for City review on request.*

20.11 For projects that disturb one (1) acre or more of soil or are part of a larger common plan of development, prior to the issuance of any grading or building permits, the applicant must demonstrate compliance with California's General Permit for Storm Water Discharges Associated with Construction Activity (Permit No. CAS000002/Order No. 2009-009- DWQ as amended) by providing a copy of the Notice of Intent (NOI) submitted to the State Water Resources Control Board and a copy of the subsequent notification of the issuance of a Waste Discharge Identification (WDID) Number; or other proof of filing in a manner meeting the satisfaction of the City Engineer. Projects subject to this requirement must prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). A copy of the current SWPPP must be kept at the project site and be available for City review on request. The applicant must ensure that the SWPPP is consistent with any City approved plan including the grading plan, site plan, building plans, and water quality management plan.

20.12 If a change of ownership takes place for the entire development or portions of the common plan of development where construction activities are still on-going, development must provide the City with Proof of a Change of Information form (COI) with the State GCP.

20.13 Prior to issuance of certificate of occupancy, the applicant must clean all on site storm drain systems, catch basins, filters, storm drain lines, inlet boxes, etc. Additionally, upon direction of the City Engineer, the applicant must clean any public storm drain systems, catch basins, filters, lines, inlet boxes that the City Engineer has determined have been impacted by the applicant's construction. If clean-up is not performed, the City may make arrangements to clean the system at developer's expense.

20.14 The owner is responsible for maintaining and operating all on-site private improvements.

20.15 All property areas must be maintained free of litter/debris.

20.16 All onsite storm drains must be cleaned at least twice a year; once immediately before October 1st (the beginning of the rainy season), and once in January. Additional cleaning may be required by the City Engineer.

20.17 Generator or tank enclosure areas must be paved with impermeable material. No other area may drain onto these areas. The enclosure area must not drain to the storm drain system or the sanitary sewer and all cleanups must be performed using dry cleanup methods. There must be no slope on the interior floor of the enclosure and the area must be bermed to prevent run-on of stormwater. The generator or tank must have adequate secondary containment to contain 110 percent of fuel or liquid in tank in event of a spill.

20.18 There must be no pressure washing of parking or loading areas, material and waste storage areas, or building site, unless the City approves a collection system to keep water from entering the storm drain.

20.19 Landscaping must be properly maintained with efficient irrigation to reduce runoff, promote surface filtration, and minimize the use of fertilizers and pesticides that can contribute to urban runoff pollution.

20.20 Prior to grading or building permit close-out and or the issuance of a certificate of occupancy, the applicant must demonstrate that compliance with the permit has been obtained by providing a copy of the Notice of Intent (NOI) submitter to the State Water Resources Control Board and a copy of the notification of the issuance of a Waste Discharge Identification (WDID) Number or other proof of filing coverage under the current Industrial General Permit. Additionally, the applicant will be subject to all requirements of Section 13-29 of the Cypress Municipal Code regarding stormwater pollution prevention including, but not limited to obtaining Water Quality permit prior to the issuance of a final certificate of occupancy.

20.21 Any applicant, occupant or its successor shall be responsible for the cost of any water quality inspections by the City that are mandated by the State of California or by the U.S. Environmental Protections Agency (USEPA) presently or in the future.

20.22 The WQMP Improvement Bonds must incorporate all post-construction stormwater devices from the approved WQMP and include two (2) bonds (faithful performance and labor and material) with each equal to 100% of the engineer's cost estimate. These costs will be provided in the WQMP for review and inclusion in the WQMP Improvement Bond and shall cover device defects

as well as malfunctions and possible replacement in the event the device is damaged or not operating per the manufacturer's specification or intended design.

20.23 The applicant will be subject to all requirements of Section 13-29 of the Cypress Municipal Code regarding stormwater pollution prevention including, but not limited to, obtaining a Water Quality permit through the City's online application and permitting system, prior to issuance of a final certificate of occupancy.

20.24 No person or person(s) shall make any modifications to drainage approved in the grading plan or approved WQMP without prior written approval from the City Engineer.

20.25 Certified full trash capture trash devices must be installed to address the Statewide Trash Amendments adopted April 7, 2015. Existing storm drain inlets located within this project must be retrofitted to address the above trash policies. Additionally, proposed post-construction BMPs must devices that are State certified for full-trash capture.

21. Building and Safety

21.1. The applicant shall submit building, grading, mechanical, electrical, and plumbing plans in compliance with the current adopted (2022) California Building Code and Cypress Municipal Code.

21.2. Applicant/developer shall provide a single point of contact for all phases of the permitting process and the construction process. The point of contact may be different for permitting and construction. The applicant/developer will provide a 24-hour contact number. This person will be responsible for all communications with Building and safety including but not limited to application, plan submittal, permit issuance, inspection requests and any other requests or inquiries. *(Building and Safety)*

21.3. The applicant will schedule a pre-construction meeting with both the Building Official and City Engineer (or designees) prior to any work starting on the project site. The meeting shall take place one to two weeks prior to the start of construction. All contractors including their superintendents, designers/engineers will be required to attend unless otherwise directed by the Director of Public Works. *(Building and Safety, Engineering)*

21.4. Construction bins for non-recyclable and recyclable materials generated from any construction site (residential and non-residential) must be placed "on site" out of the public right-of-way unless permit is obtained from the City Engineer. *(Building & Safety)*

21.5. A pre-grading SWPPP's inspection is required prior to grading permit issuance.

All required grading stormwater BMPs shall be installed and inspected by the Building Division prior to release of the grading permit.

- *A grading permit may be issued prior to BMP installation/inspection if the applicant, or the contractor performing the work, posts a cash bond (with compliance schedule) in a form and amount approved by the Public Works Director. Cash bonds will be forfeited if any grading work occurs prior to authorization to proceed. Surrendering the cash bond* ***does not permit*** *the applicant to perform any work not previously authorized.*

21.6. Delivery, loading and unloading of construction materials shall occur on site and not within the Public Right of Way unless a permit is obtained from the City Engineer. *(Building and Safety)*

22. Solid Waste

22.1. The applicant shall construct new or modify its existing trash enclosure structures to house all required solid waste containers (trash, recycle, organics) and possess a solid covered roof that prohibits stormwater to enter and then discharge from the enclosure. *(Public Works, Water Quality)* (Trash Enclosures)

22.2. The applicant shall subscribe to solid waste services from the City's solid waste hauler with no less than one time per week service for trash, recycling, and organics recycling. These shall be properly maintained and not allowed to overflow. Source separated organic recycling is required unless alternatives are approved in writing from the Public Works Director. (Public Works, Water Quality)

22.3. For phased construction, as buildings are occupied, the applicant shall ensure there is adequate room and clearance for solid waste trucks and for placement of construction bins on site during construction. Access ways shall not be blocked without written approval of the Building Official. (Public Works)

22.4. The applicant shall not install a trash compactor at the site without first having received written approval from the City's solid waste hauler. *(Public Works)*

23. Security

23.1. The property address shall be clearly identified on both sides of the freestanding sign base. A minimum of six-inch lettering shall be used for the property address. The property address shall also be posted in a visible location on the building. *(Police Department.)*

23.2. The address number of every commercial building shall be illuminated during the hours of darkness so that it shall be easily visible from the street. *(Police Department)*

23.3. All exterior commercial doors, during the hours of darkness, shall be illuminated with a minimum of one footcandle of light. All exterior bulbs shall be protected by weather and vandalism resistant cover(s). *(Police Department)*

23.4. The landscaping and lighting plans for the project shall also be subject to review by the Cypress Police Department. *(Police Department)*

23.5. The applicant will provide a Crime Prevention through Environmental Design study for approval by the planning and police departments. *(Police Department)*

23.6. The building tenants shall install a surveillance camera system, colored monitor, and silent alarm. *(Police Department)*

24. Fire

24.1. The applicant or responsible party shall submit the plan(s) listed below to the Orange County Fire Authority for review. Approval shall be obtained on each plan prior to the event specified. Specific submittal requirements may vary from these listed below.

Prior to issuance of a building permit,:

- Fire master plan (service code PR145)

Prior to issuance of a building permit:

- Architectural (service codes PR200/PR224)
- Tanks storing hazardous materials (service codes PR300-PR305)
- Underground piping for private hydrants and fire sprinkler systems (service code PR470-PR475)
- Fire sprinkler system (service codes PR400-PR465)

24.2 Prior to OCFA issuance of a precise grading permit or a building permit, if a grading permit is not required approval shall be obtained for a fire master plan.

24.3 Irrevocable reciprocal access easements for emergency access purposes to the benefit of the Cypress shall be recorded prior to approval of the fire master plan.

24.5 The applicant shall receive clearance from the OCFA prior to bringing combustible building materials on-site. Call OCFA Inspection Scheduling at 714-573-6150 with the Service Request number of the approved fire master plan at least five days in advance to schedule the lumber drop inspection.

Effective: 11/18/2024

RESOLUTION NO.

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CYPRESS, CALIFORNIA, CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT, AND ADOPTING FINDINGS OF FACT, MITIGATION MEASURES, AND A MITIGATION MONITORING AND REPORTING PROGRAM FOR THE DEVELOPMENT OF A 191,394 SQUARE-FOOT WAREHOUSE BUILDING AND ASSOCIATE PARKING AND LANDSCAPING AT 5665 PLAZA DRIVE IN THE MCDONNELL CENTER SPECIFIC PLAN, IN THE CITY OF CYPRESS, CALIFORNIA.

WHEREAS, the City Council of the City of Cypress has considered an application submitted by GLC Cypress, LLC ("Applicant") for a new 191,394 square-foot (sf) warehouse building and associate parking and landscaping at 5665 Plaza Drive in the McDonnell Center Specific Plan (the "Project"); and

WHEREAS, the Project requires approval of a Specific Plan Amendment (SPA No. 2024-01) and a Site Plan Review (SPR No. 2024-01), that required the preparation of an Environmental Impact Report ("EIR"); and

WHEREAS, on May 7, 2024, the City issued a Notice of Preparation ("NOP") of the Draft EIR for the Project (State Clearinghouse No. 2020069007); and

WHEREAS, the Notice of Preparation (NOP) was circulated for comment for the public, responsible, and trustee agencies for a 30-day public review period between May 7, 2024 and June 5, 2024, during which time the City held a public scoping meeting on May 28, 2024; and

WHEREAS, the Notice of Availability ("NOA") for the Draft EIR was issued on August 12, 2024, and the Draft EIR was circulated for public review from August 12, 2024 through September 27, 2024; and

WHEREAS, following the close of the public review period, the Final EIR was prepared, which includes written responses to the comments received during the public review period; and

WHEREAS, the responses to comments on the Draft EIR are full and complete in compliance with CEQA. The responses to comments do not affect the analysis in the Draft EIR, and do not require the recirculation of information; and

WHEREAS, the Final EIR identifies the potential for significant effects on the environment from development of the Project, all of which can be reduced through implementation of mitigation measures to a level of insignificance. Therefore, the approval of the Project must include findings regarding mitigation measures and alternatives. The City has prepared the Findings of Fact set forth in Exhibit A, which findings are incorporated herein by this reference; and

WHEREAS, the City has prepared a Mitigation Monitoring and Reporting Program to ensure monitoring and implementation of the mitigation measures which is set forth in Exhibit B and is incorporated by this reference; and

WHEREAS, on November 12, 2024 and November 18, 2024, the City Council held a duly noticed public hearing to consider certification of the EIR and approval of the Project.

NOW, THEREFORE, BE IT RESOLVED that the City Council has considered the full record before it, which may include but is not limited to such things as the staff report, testimony by staff and the public, and other materials and evidence submitted or provided to it. Furthermore, the recitals set forth above are found to be true and correct and are incorporated herein by reference,

BE IT FURTHER RESOLVED, that the Cypress City Council determines, finds, and certifies as follows:

SECTION 1. The City Council certifies that the Final EIR for the Project has been completed in compliance with CEQA, Public Resources Code section 21000 *et seq.*, the State CEQA Guidelines, California Code of Regulations, title 14, section 15000 *et seq.*, and all applicable state and local guidelines, and that it reflects the independent judgment of the City. The City Council further certifies that it has fully reviewed the Final EIR prior to considering the approval of the Project.

SECTION 2. The City Council hereby adopts Findings of Fact for the Project, attached hereto as Exhibit A.

SECTION 3. The City hereby adopts the Mitigation Monitoring and Reporting Program for the Project, attached hereto as Exhibit B, and adopts and incorporates into the Project all of the mitigation measures within the responsibility and jurisdiction of the City of Cypress.

SECTION 4. The City hereby directs City staff to file a Notice of Determination with the County Clerk and the State Clearinghouse as required by CEQA.

PASSED, APPROVED and ADOPTED by the City Council of the City of Cypress at a regular meeting held on the 18th day of November, 2024.

_____

MAYOR OF THE CITY OF CYPRESS

ATTEST:

_____
CITY CLERK OF THE CITY OF CYPRESS

STATE OF CALIFORNIA)
COUNTY OF ORANGE)SS

I, ALISHA FARNELL, City Clerk of the City of Cypress, DO HEREBY CERTIFY that the foregoing Resolution was duly adopted at a regular meeting of the said City Council held on the 12th day of November, 2024, by the following roll call vote:

AYES: COUNCIL MEMBERS:
NOES: COUNCIL MEMBERS:
ABSENT: COUNCIL MEMBERS:

_____
CITY CLERK OF THE CITY OF CYPRESS

Exhibit A

Findings Of Fact

1.0 INTRODUCTION

1.1 Findings of Fact

The California Environmental Quality Act (CEQA) requires that the environmental impacts of a project be examined and disclosed prior to approval of a project. Pursuant to CEQA Guidelines Section 15091(a), no public agency shall approve or carry out a project for which an Environmental Impact Report (EIR) has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR [referred to in these Findings as "Finding 1"].

2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency [referred to in these Findings as "Finding 2"].

3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR [referred to in these Findings as "Finding 3"].

Having received, reviewed and considered the EIR prepared for the 5665 Plaza Drive Project (proposed project), State Clearinghouse (SCH) No. 2024040017, as well as all other information in the record of proceedings on this matter, the following Findings Regarding the CEQA Documents for the project are hereby adopted by the City of Cypress (City).

1.2 Document Format

These Findings have been categorized into the following sections:

1) **Section 1.0** provides an introduction to these Findings.

2) **Section 2.0** provides a summary of the project, overview of other discretionary actions required for the project, and a statement of project objectives.

3) **Section 3.0** provides a summary of those activities that have preceded the consideration of the Findings for the project as part of the environmental review process, and a summary of public participation in the environmental review for the project.

4) **Section 4.0** sets forth findings regarding those potentially significant environmental impacts identified in the CEQA Documents which the City has determined to be less than significant with the implementation of project design features.

5) **Section 5.0** sets forth findings regarding those significant or potentially significant environmental impacts identified in the CEQA Documents which the City has determined can feasibly be

mitigated to a less than significant level through the imposition of mitigation measures included in the Mitigation, Monitoring and Reporting Program (MMRP) for the project.

6) **Section 6.0** sets forth findings for significant and unavoidable project impacts.

7) **Section 7.0** sets forth findings regarding growth-inducing impacts.

8) **Section 8.0** sets forth findings regarding alternatives to the project.

9) **Section 9.0** contains findings regarding the MMRP for the project.

10) **Section 10.0** contains other relevant findings adopted by the City with respect to the project.

The Findings set forth in each section herein are supported by findings and facts identified in the administrative record of the project.

1.3 Custodian and Location of Records

The documents and other materials that constitute the administrative record for the City's actions regarding the proposed project are located at the City of Cypress Community Development Department, located at 5275 Orange Avenue, Cypress, California 90630. The City Clerk is the custodian of the administrative record for the project.

2.0 PROJECT SUMMARY

2.1 Project Description/Location

The proposed project would be located on an approximately 8.53-acre site (project site) at 5665 Plaza Drive in Cypress, California. Currently, the project site is developed with a 150,626 square-foot, five-story office building, a surface parking lot, and ornamental landscaping. The project site is bounded by industrial and office uses to the north, industrial uses to the west, Plaza Drive to the south, and Goodman Commerce Center Project to the east. The Goodman Commerce Center Project, approved in April 2023, was under construction at the time of the preparation of this EIR.

The proposed project includes the demolition of an existing 150,626-square-foot five-story office building on the project site and the construction of a new 191,394-square-foot light industrial building with 181,061 square feet of warehouse space and 10,333 square feet of office space. The maximum height of the proposed building would be approximately 51 feet, 6 inches to the top of the parapet wall. The proposed project would include a truck loading area with 25 dock-high loading doors on the west side of the proposed building. The project site is currently accessible from two driveways along Plaza Drive. The new westernmost driveway would be the primary truck access point and path to the truck-loading docks on the proposed building's west side. The eastern driveway would be a shared driveway with the parcel to the east. The proposed project would include parking stalls throughout the project site's perimeter, new water and sewer lines connecting with existing water and sewer mains within Plaza Drive, new stormwater infrastructure, and new ornamental landscaping.

2.2 Discretionary Actions

The City is the Lead Agency and has principal authority and jurisdiction over all land use entitlements within its incorporated boundaries. The proposed project would require the following discretionary approvals by the City:

- The City Council would certify that the Final EIR addresses the potential environmental effects of the proposed project and identifies appropriate mitigation measures to address any potentially significant effects;

- Specific Plan Amendment to the McDonnell Center Specific Plan to allow light industrial uses in the eastern portion of Planning Area 1, and removal of the maximum developable area requirement while retaining the 1.0:1 floor-area ratio (FAR) to maintain consistency with the General Plan; and

- Site plan approval.

2.3 Statement of Objectives

The City has established the following intended specific objectives for the proposed project that would serve to aid decision-makers in their review of the proposed project and its associated environmental impacts:

1) To meet a greater market demand for state-of-the-art light industrial buildings by replacing vacant office building.

2) To promote development that will attract new businesses to operate in the City.

3) To encourage business development that will generate a range of employment opportunities for the community.

4) To help attract new business enterprises that will result in a positive flow of revenue to the City.

5) To establish a use consistent with the business park and light industrial uses in proximity to the project site.

3.0 ENVIRONMENTAL REVIEW AND PUBLIC PARTICIPATION

A Notice of Preparation (NOP) was distributed for the proposed project by the City to the State Clearinghouse on May 7, 2024. The State of California Clearinghouse issued a project number for the project, SCH No. 2024040017. In accordance with CEQA Guidelines Section 15082, the NOP was circulated to interested agencies, groups, and individuals for a period of 30 days, from May 7, 2024, to June 5, 2024, during which comments were solicited and received, pertaining to environmental issues/topics that the Draft EIR should evaluate. These NOP responses were considered in the preparation of the Draft EIR, which upon release, was made available to all Responsible/Trustee Agencies and interested groups and individuals, as required under *State CEQA Guidelines* Sections 15105 and 15087. A virtual public scoping meeting was held on May 28, 2024.

The State-mandated public review of the Draft EIR began on August 12, 2024, and concluded on September 27, 2024. The Final EIR includes a Response to Comments package, which presents all written comments received during the public review period of the Draft EIR and includes responses to these comments and associated changes made to the EIR in the form of an Errata.

The EIR includes any exhibits or appendices thereto, the list of persons, organizations and public agencies which commented on the EIR, the comments which were received by the City regarding the EIR, and the City's written responses to comments raised in the public review and comment process, all of which are incorporated herein and made a part hereof by reference. Pursuant to *State CEQA Guidelines* Section 15084, the EIR has been reviewed and analyzed by the City of Cypress as the lead agency with respect to the project and the EIR. The following findings for the project and each fact in support of a finding are thus based upon substantial evidence in the record.

4.0 FINDINGS REGARDING ENVIRONMENTAL IMPACTS DETERMINED TO HAVE NO IMPACTS OR BE LESS THAN SIGNIFICANT

The City finds, based upon the analysis presented in Chapter 4.0 of the Draft EIR, that the following environmental effects of the proposed project either have no impact or are less than significant, and, therefore, no mitigation measures are required. The City hereby finds that existing regulatory requirements, policies, and/or project conditions have been identified and incorporated into the project which avoids or substantially lessens the potentially significant effect on the environment to a less than significant level.

4.1 Aesthetics

Adverse Effect on a Scenic Vista: No Impact

A scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. Aesthetic components of a scenic vista generally include (1) scenic quality, (2) sensitivity level, and (3) view access. Although the City of Cypress does not provide a definition of scenic vistas, potential scenic vistas include areas with views of the coastline, mountains, or other prominent scenic features that are considered significant visual resources for residents and businesses. The City is almost entirely developed and neither the project site nor other properties in the project vicinity provide substantial views of any water bodies, mountains, hilltops, or any other significant visual resources. As such, the City has not designated any scenic corridors or scenic vistas within its boundaries.

The project site is located in a flat area and is surrounded by urban development, including several buildings and surface parking lots. As there are not scenic resources that could be blocked by the proposed project and the surrounding area is characterized by office and light industrial development, the proposed project would neither alter an existing scenic vista nor block views of any scenic vistas.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not have a substantial adverse effect on a scenic vista. Therefore, no impact would occur. No mitigation is required.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to pages 4.1-1 through 4.1-2 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Damage to Scenic Resources: No Impact

There are no designated State Scenic Highways within the City's limits. According to the List of Eligible and Officially Designated State Scenic Highways published by the California Department of Transportation (Caltrans), the only State-designated Scenic Highway in the County of Orange (County) is a 4-mile segment of State Route 91 (SR-91) from State Route 55 (SR-55) to east of the Anaheim city limits. The nearest State highway that is eligible for official designation as a State Scenic Highway is a portion of Pacific Coast Highway (PCH or State Route 1 [SR-1]), which is located approximately 5.75

miles southwest of the project site in the City of Seal Beach. Due to distance and intervening land uses, no portion of the project site or the surrounding area is viewable from the officially designated portion of SR-91 or the eligible portion of PCH. As such, the proposed project would not result in impacts related to the substantial damage of scenic resources within a State Scenic Highway.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not significantly affect scenic highways and corridors. No impacts would occur related to scenic highways and corridors. Consequently, no mitigation measures are required for this no impact determination.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to page 4.1-2 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Degrade Visual Character or Quality of Views: Less Than Significant Impact

According to the United States Census Bureau, the City of Cypress is located within the Los Angeles—Long Beach—Anaheim, CA Urbanized Area. Because the City is located in an urbanized area, the project site is, therefore, located within an urbanized area. Further, surrounding land uses in the vicinity are representative of urban densities.

In its existing condition, the project site consists of approximately 8.53 acres of land currently developed with a five-story office building and its associated surface parking lot, and ornamental landscaping. The project site is bounded on the east by the approved Goodman Commerce Center Project (approved in April 2023) consisting of two light industrial buildings and is currently under construction. The project site is surrounded by light industrial uses to the north and west and office uses to the south. The project site is visible from several public roadways surrounding the project site (Plaza Drive, Katella Avenue, and Walker Street), and land uses surrounding the project site are urban and include office and light industrial uses.

The project site is within Planning Area 1 of the City's McDonnell Specific Plan Area (PC-3) and is currently designated as Office, which allows general office uses. As part of the project approval process, the project would require site plan review and an amendment to the McDonnell Specific Plan. The proposed project would not conflict with applicable zoning and other regulations governing scenic quality.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. Potential impacts are considered less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to page 4.1-3 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Add New Source of Light or Glare: Less Than Significant Impact

As discussed above, the project site is surrounded by a variety of office/light industrial uses. The nearest light-sensitive land uses are residential uses approximately 1,400 feet north of the project site along Cerritos Avenue. Other sources of light on and adjacent to the project site include exterior lighting from adjacent properties, streetlights, and vehicle headlights.

Construction would occur primarily during the daylight hours. Any construction-related illumination during the evening and nighttime hours would be shielded to the extent feasible and would consist of the minimum lighting required for safety and security purposes only and would occur only for the duration required for the temporary construction process. Due to its limited scope and short duration, light resulting from construction activities would not substantially impact sensitive uses, substantially alter the character of off-site areas surrounding the construction area or interfere with the performance of an off-site activity. Minor glare from sunlight on construction equipment and vehicle windshields is not anticipated to impact visibility in the area because (1) relatively few construction vehicles and pieces of construction equipment would be used on the project site, and (2) the construction site would be fenced and shielded from pedestrian and vehicular views. Construction vehicles would not operate at night and thus would not create nighttime sources of glare. Therefore, construction of the proposed project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, and light and glare impacts associated with construction would be less than significant. No mitigation would be required.

The proposed project would include lighting that would be distributed throughout the project site. A mix of lighting would be used to balance both safety lighting and ambient/enhanced lighting throughout the site. Light fixtures would be specified and located to incorporate shielding to minimize and eliminate lighting spillover from the project site into neighboring properties. All exterior lighting associated with the proposed project would be implemented in conformance with the exterior lighting requirements in Section M of the McDonnell Specific Plan, which include the following:

1. All exterior lighting shall be shielded and confined within site boundaries.

2. Light standards and fixtures in parking areas shall not exceed twenty-five (25) feet in height. Security lighting fixtures shall not project above the fascia or roofline of the building.

Additionally, the proposed project's exterior lighting would be required to comply with the City's Lighting Standards 3.11.060, Exterior Lighting, and Section 3.10.060, Light and Glare, of the City's Zoning Ordinance. Section 3.10.060, Light and Glare, requires that light and glare associated with business operations are shielded or directed to avoid illuminating adjacent properties or causing glare that affects motorists. The proposed project would also be required to comply with Cypress Municipal Code Section 3.11.060, Exterior Lighting, which requires that (1) lighting fixtures are appropriate in height, intensity, and scale to the use they are serving; (2) the level of parking lot lights is between 2 and 4 footcandles at the base of the light fixture; and (3) light sources visible from outside a project's boundary are shielded to reduce glare so that neither the light source nor its image from a reflective

surface shall be directly visible from any point beyond the property line. Compliance with Cypress Municipal Code Sections 3.10.060 and 3.11.060 would minimize light and glare spillover impacts related to the proposed project. Impacts related to glare from on-site lighting would not occur because the exterior building materials would not include highly reflective materials. Therefore, lighting provided as part of the proposed project would be largely consistent with the type and intensity of existing lighting in the vicinity of the project site.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Potential impacts are considered less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to pages 4.1-4 through 4.1-6 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

4.2 Agriculture and Forestry Resources

All Thresholds: No Impact

The project would not result in any impacts related to agriculture and forestry resources as the project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, there are no lands within the City that are currently under a Williamson Act contract, and there is no forest or timberland present within the project site that could be lost from project implementation. The entire project site and surrounding area is designated as "Urban and Built Up Land" according to the California Department of Conservation, and the proposed project is within Planning Area 1 of the McDonnell Specific Plan, which does not allow for agricultural uses within any of its planning areas.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not generate substantial impacts to Prime Farmland, Unique Farmland, and Farmland of Statewide Importance, and would not conflict with existing zoning for agricultural use, or forest land, and would not result in loss of forest land. Therefore, no impact would occur, and no mitigation measures are required.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to pages 4.2-1 through 4.2-3 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

4.3 Air Quality

Conflict with or Obstruct Implementation of Applicable Air Quality Plan: Less Than Significant Impact

The proposed project would not conflict with or obstruct implementation of the 2022 Air Quality Management Plan (AQMP) because the project's construction and operational emissions would not exceed the South Coast Air Quality Management District's (SCAQMD) regional significance thresholds or Localized Significance Thresholds (LSTs), and the proposed project is consistent with the land use and growth intensities reflected in the City's adopted General Plan. Furthermore, the project would not exceed any applicable regional or local thresholds. Based on the consistency analysis provided in Section 4.1, Air Quality, of the Draft EIR, the proposed project would be consistent with the regional AQMP. Therefore, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not conflict with or obstruct implementation of the applicable air quality plan. Potential impacts are considered less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to the Draft EIR pages 4.1-21 through 4.1-22.

Cumulatively Considerable Net Increase of Criteria Pollutant: Less Than Significant Impact

Construction emissions associated with the proposed project would not exceed the SCAQMD's thresholds for volatile organic compounds (VOCs), nitrogen oxides (NO_X), carbon monoxide (CO), sulfur oxides (SO_X), particulate matter less than 2.5 microns in diameter ($PM_{2.5}$), and particulate matter less than 10 microns in diameter (PM_{10}). Therefore, construction of the proposed project would not result in a cumulatively considerable increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State Ambient Air Quality Standards (AAQS). Impacts would be less than significant, and no mitigation is required.

Operational emissions associated with the proposed project would not exceed the significance criteria for daily VOCs, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State AAQS. Impacts would be less than significant, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the construction and operations of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under applicable federal or State AAQS. Potential impacts are considered less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to the Draft EIR pages 4.1-22 through 4.1-27.

Expose Sensitive Receptors to Pollutants: Less Than Significant Impact

The proposed project would not result in an exceedance of a SCAQMD LST during project construction or operation. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant. Mitigation is not required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not expose sensitive receptors to substantial pollutant concentrations. Potential impacts are considered less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to the Draft EIR pages 4.1-28 through 4.1-29.

Other Emissions, Such as Odors: Less Than Significant Impact

Heavy-duty equipment on the project site during construction would emit odors, primarily from equipment exhaust. In addition, the application of asphalt and architectural coatings during construction activities may result in odors. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and are thus considered less than significant.

The proposed project would construct a light industrial building. Therefore, the proposed project does not contain land uses typically associated with emitting objectionable odors. The proposed project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed operations would be less than significant, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not result in other emissions, such as those leading to odors, that would adversely affect a substantial number of people. Potential impacts are considered less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to the Draft EIR page 4.1-29.

4.4 Biological Resources

Adverse Effects on Special Status Species: No Impact

The perimeter and parking areas of the site are surrounded with landscaped areas consisting of trees and small bushes. The United States Fish and Wildlife Service (USFWS) Critical Habitat for Threatened & Endangered Species map does not identify any locations of critical habitat within the project site. The closest known critical habitat is the Bolsa Chica Ecological Reserve, which contains the Western snowy plover, approximately 6.8 miles south of the project site. Additionally, critical habitat for the Coastal California gnatcatcher is located in the West Coyote Hills approximately 7 miles north of the project site, just north of Ralph B. Clark Park. According to the California Natural Diversity Database (CNDDB), no sensitive plant species have been documented on the project site or in the immediately surrounding area.

The Orange County Transportation Authority's (OCTA) 2016 Natural Community Conservation Plan/ Habitat Conservation Plan (NCCP/HCP), which was adopted for the purpose of permitting freeway capital improvement projects proposed by OCTA and OCTA's habitat preserve, restoration, and monitoring activities, includes a Plan Area that covers the entirety of Orange County, including Cypress. The City is not a party to the OCTA NCCP/HCP, and development activity within the City is not subject to the provisions of the OCTA NCCP/HCP. Therefore, the OCTA NCCP/HCP does not apply to the proposed project. No special-status species are anticipated to be directly affected by the project due to the lack of suitable habitat on the project site. Therefore, no impacts to sensitive or special-status species would result from implementation of the proposed project, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not have a substantial adverse effect on any special-status species in applicable plans, policies, or regulations. No impacts would occur. Consequently, no mitigation measures are required.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to pages 4.4-1 through 4.4-2 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Adverse Effects on Riparian Habitat or Other Sensitive Natural Community: No Impact

The project site is highly disturbed and developed with an office building, a paved parking lot, and landscaping, and does not support any special-status or sensitive riparian habitat as identified in regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or USFWS. Therefore, no impacts related to riparian habitat or other sensitive natural communities identified in a local or regional plan would result from project implementation, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified by the CDFW or USFWS. No impact would occur. Consequently, no mitigation measures are required for this no impact determination.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to page 4.4-2 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Adverse Effect on Protected Wetlands: No Impact

According to the National Wetlands Inventory managed by the USFWS, the project site does not contain federally protected wetlands. The project site is located entirely outside of streambeds, banks, and riparian habitat. No potential waters of the United States or CDFW jurisdictional areas are located on the project site.

Although construction activities have the potential to result in temporary indirect effects to water quality including a potential increase in erosion and sediment transport into downstream aquatic areas and the contamination of waters from construction equipment, these potential indirect effects to hydrology and water quality would be avoided or substantially minimized through the implementation of Best Management Practices (BMPs) and a Water Quality Management Plan as discussed in Section 4.10, Hydrology and Water Quality, of the Draft EIR. Specifically, adherence to Regulatory Compliance Measure HYD-3, provided in Section 4.10, would address erosion-related impacts during construction through implementation of construction site BMPs to avoid erosion and sedimentation impacts to downstream aquatic areas and water quality. As such, there would be no impacts on State or federally protected wetlands.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not have a substantial adverse effect on State or federally protected wetlands. No impact would occur. Consequently, no mitigation measures are required.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to pages 4.4-2 through 4.4-3 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Interference with Wildlife Movement: Less Than Significant Impact

Due to the surrounding urban development, the project site does not function as a wildlife movement corridor. Species that are found on site either fly onto the site or are able to navigate on the ground through long stretches of urban development. Therefore, the project site does not contain any native resident or migratory fish, wildlife species, or wildlife corridors. In addition, no portion of the project site or the immediately surrounding areas contains an open body of water that serves as natural habitat in which fish could exist.

The existing trees on the project site may provide habitat suitable for nesting migratory birds that were observed on the project site. Several of the existing on-site trees, which are primarily ornamental, would be removed during construction. Therefore, the proposed project has the

potential to impact active bird nests if vegetation and trees are removed during the nesting season. Nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulations, Part 10) and Section 3503 of the California Fish and Game Code. Therefore, implementation of the proposed project would be subject to the provisions of the MBTA, which prohibits disturbing or destroying active nests. Project implementation must be accomplished in a manner that avoids impacts to active nests during the breeding season. If project construction occurs between February 1 and August 31, a qualified biologist shall conduct a nesting bird survey prior to ground- and/or vegetation-disturbing activities to confirm the absence of nesting birds. As documented in Regulatory Compliance Measure BIO-1, avoidance of impacts can be accomplished through a variety of means, including establishing suitable buffers around any active nests. With implementation of Regulatory Compliance Measure BIO-1, impacts to nesting birds would be less than significant, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not interfere substantially with wildlife movement. Potential impacts are considered less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required. However, Regulatory Compliance Measure BIO-1 is applicable to the proposed project.

Supportive Evidence: Please refer to pages 4.4-3 through 4.4-4 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Conflict with Biological Protection Policies: Less Than Significant Impact

The Landmark Tree Ordinance in the City's Municipal Code protects designated landmark trees that are specifically identified in the City's *Inventory of Landmark Trees* (July 1996). As shown in this inventory, there are no landmark trees on the project site. The removal of any on-site trees or vegetation would not conflict with the City's Landmark Tree Ordinance.

Per Article IV of the Municipal Code, Street Trees, any tree within the public right-of-way belongs to the City of Cypress. Any work to street trees conducted as part of the proposed project would be done in accordance with the City Council's adopted Parkway Tree Policy. The City has not adopted any other policies or ordinances protecting biological resources.

Therefore, because the project would comply with all local policies and ordinances relating to tree protection, it would not result in any conflicts with local policies or ordinances protecting biological resources. Less than significant impacts would occur, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not conflict with any local policies or ordinances protecting biological resources. Potential impacts are considered less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to page 4.4-4 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Conflict with Adopted Conservation Plan: No Impact

There is no adopted HCP, NCCP, or other habitat conservation plan in the City. As discussed previously, the OCTA NCCP/HCP includes a Plan Area that covers the entirety of Orange County, including Cypress. The City is not a party to the OCTA NCCP/HCP, and development activity within the City is not subject to the provisions of the OCTA NCCP/HCP. Therefore, the OCTA NCCP/HCP does not apply to the proposed project, and the proposed project would not conflict with any local, regional, or State HCP or NCCP. The proposed project would not result in impacts related to conflict with any provisions of an HCP or NCCP, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not conflict with the provisions of an adopted HCP, NCCP, or other conservation plan. No impact would occur. Consequently, no mitigation measures are required for this no impact determination.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to pages 4.4-4 through 4.4-5 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

4.5 Cultural Resources

Adverse Change in the Significance of a Historical Resource: No Impact

The South Central Coastal Information Center record search results and field survey identified no previously recorded cultural resources on or in soils on the project site. As such, there are no historical resources as defined in State CEQA Guidelines Section 15064.5 located within the project site. The proposed project would not cause a substantial adverse change in the significance of a historical resource, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not cause a substantial adverse change in the significance of an historical resource. No impacts would occur. Consequently, no mitigation measures are required.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to the Draft EIR pages 4.2-6.

Disturbance of Human Remains: Less Than Significant Impact

Although no human remains are known to be on the project site or are anticipated to be discovered during project construction, due to ground disturbance, there is a possibility of inadvertent discovery of human remains. Disturbing human remains could violate the State's Health and Safety Code as well as destroy the resource. Regulatory Compliance Measure CUL-1 requires compliance with the State's Health and Safety Code for the treatment of human remains. Adherence to regulatory standards included in Regulatory Compliance Measure CUL-1 would reduce the impact of the proposed project on human remains to less than significant. No mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not disturb any human remains, including those interred outside of dedicated cemeteries. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required. However, Regulatory Compliance Measure CUL-1 is applicable to the proposed project.

Supportive Evidence: Please refer to the Draft EIR pages 4.2-7.

4.6 Energy

Wasteful, Inefficient, or Unnecessary Consumption of Energy: Less Than Significant Impact

Construction activities are not anticipated to result in an inefficient use of energy because gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the proposed project. Energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. In addition, the proposed project would be required to comply with Regulatory Compliance Measure EN-1, provided below, which would reduce energy usage on the project site during construction through reducing truck idling times. With implementation of Regulatory Compliance Measure EN-1, impacts to energy resources during project construction would be less than significant, and no mitigation is required.

Energy use consumed by the proposed project would be associated with natural gas use, electricity consumption, and fuel used for vehicle and truck trips associated with the project. The estimated potential net increase in electricity demand associated with the operation of the proposed project is 3,106,447 kilowatt-hours (kWh) per year. Total electricity consumption in Orange County in 2022 was 20,243.7 gigawatt-hours (GWh) or 20,243,721,856 kWh. Therefore, operation of the proposed project would increase the annual electricity consumption in Orange County by less than 0.1 percent. The estimated potential net increase in natural gas demand associated with the proposed project is 38,407 therms per year. Total natural gas consumption in Orange County in 2022 was 572 million therms (572,454,744 therms). Therefore, operation of the proposed project would negligibly increase the annual natural gas consumption in Orange County by less than 0.1 percent. In addition, the proposed project would result in energy usage associated with gasoline and diesel to fuel project-related trips. The proposed project is estimated to result in the net decrease of approximately 6,498 gallons of gasoline and the net increase of approximately 132,401 of diesel fuel per year from existing

conditions. Based on fuel consumption obtained from EMFAC2021, 155.9 million gallons of diesel and 1.2 billion gallons of gasoline are anticipated to be consumed from vehicle trips in Orange County in 2023. Therefore, vehicle and truck trips associated with the proposed project would not increase the annual gasoline fuel use in Orange County and would increase the annual diesel fuel use by approximately 0.1 percent in Orange County. Therefore, operation of the proposed project would represent a very small percentage of the annual gasoline and diesel fuel consumption in Orange County. Vehicles associated with trips to and from the project site would be subject to fuel economy and efficiency standards, which are applicable throughout the State. The proposed project would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy and would incorporate renewable energy or energy efficiency measures into building design, equipment uses, and transportation. Impacts would be less than significant, and no mitigation measures would be necessary.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the project would not result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required. However, Regulatory Compliance Measure EN-1 is applicable to the proposed project.

Supportive Evidence: Please refer to the Draft EIR pages 4.3-7 through 4.3-10.

Conflict with or Obstruction of Energy Plans: Less Than Significant Impact

Energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the overall use in the County. In addition, energy usage associated with operation of the proposed project would be relatively small in comparison to the overall use in the County and the State's available energy sources. Therefore, energy impacts at the regional level would be negligible. Because California's energy conservation planning actions are conducted at a regional level, and because the proposed project's total impact on regional energy supplies would be minor, the proposed project would not conflict with or obstruct California's energy conservation plans as described in the California Energy Commission's (CEC) Integrated Energy Policy Report. Potential impacts related to conflict with or obstruction of a State or local plan for renewable energy or energy efficiency would be less than significant, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not conflict or obstruct a State or local plan for renewable energy or energy efficiency. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to the Draft EIR pages 4.3-10 through 4.3-11.

4.7 Geology and Soils

Adverse Effects Related to Earthquake Fault Rupture: No Impact

According to the Geotechnical Evaluation, prepared for the proposed project, active faults do not appear to be present under or in close proximity to the project site. Additionally, according to the California Geological Survey's EQ Zapp: California Earthquake Hazards Zone Application (EQ Zapp web-based application), the Newport-Inglewood and Whittier Fault Zones are the nearest fault zones located approximately 5.1 miles southwest and 11.6 miles northeast of the project site, respectively. Therefore, surface rupture is not anticipated to occur within the project site or surrounding vicinity. No impact would occur, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving the rupture of a known Alquist-Priolo Earthquake Fault. No impacts would occur. Consequently, no mitigation measures are required.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to the Draft EIR pages 4.4-9.

Adverse Effects Related to Strong Seismic Ground Shaking: Less Than Significant Impact

The Geotechnical Evaluation determined no evidence of active faults to be present under or in close proximity to the project site. However, incidental ground cracking and other ground shaking phenomena can occur due to high seismic accelerations and regional seismic activity. Thus, it was determined in the Geotechnical Evaluation that risks associated with seismic shaking and strong ground motion are considered to be moderate. As specified in Regulatory Compliance Measure GEO-1, below, the proposed project's building would be subject to the seismic design criteria of the most current California Building Code requirements that aim to prevent building collapse and reduce the impacts of seismic ground shaking. Adherence to these requirements would address injury and loss of life and building damage after an earthquake. Therefore, with the implementation of Regulatory Compliance Measure GEO-1, impacts related to seismic ground shaking would be less than significant, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required. However, Regulatory Compliance Measure GEO-1 is applicable to the proposed project.

Supportive Evidence: Please refer to the Draft EIR page 4.4-10.

Adverse Effects Related to Landslides: No Impact

According to the City's General Plan Safety Element, landslides have not been recorded within the City boundaries and are not anticipated based on the lack of any significant topographic features. Further, according to the Geotechnical Evaluation, the topography of the site is relatively flat to very gently sloping. Evidence of ancient landslides or slope instabilities were not observed at the project site. Both the project site and surrounding properties are flat with no unusual geographic features, and therefore, neither the project site nor the surrounding area has the potential for impacts related to landslides. No mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides. No impact would occur. Consequently, no mitigation measures are required for this no impact determination.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to the Draft EIR page 4.4-11.

Substantial Soil Erosion or Loss of Topsoil: Less Than Significant Impact

During project construction activities, soil would be exposed and disturbed, drainage patterns would be temporarily altered during grading and other construction activities, and there would be an increased potential for soil erosion and siltation compared to existing conditions. The Construction General Permit requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) (Regulatory Compliance Measure HYD-1 in Appendix B of the Initial Study and the MMRP). The SWPPP would detail Erosion Control and Sediment Control Best Management Practices (BMPs) to be implemented during project construction to minimize erosion and retain sediment on site. With compliance with the requirements of the Construction General Permit and with implementation of the construction BMPs, construction impacts related to substantial soil erosion and loss of topsoil would be less than significant.

Operation of the proposed project would not result in substantial soil erosion or loss of topsoil. Potential soil erosion impacts related to construction activities would be less than significant with adherence to the required regulations discussed above. Operation of the proposed project would result in no impacts related to soil erosion or loss of topsoil. No mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not result in substantial soil erosion or the loss of topsoil. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required. However, Regulatory Compliance Measure HYD-1 is applicable to the proposed project.

Supportive Evidence: Please refer to the Draft EIR page 4.4-11.

Expansive Soils: Less Than Significant Impact

According to the Geotechnical Evaluation prepared for the proposed project, surface site soils had a "very low" potential for expansion. No recommendations are provided in the Geotechnical Evaluation related to expansive soils due to this very low potential. Therefore, impacts related to expansive soils for the proposed project would be less than significant. No mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not be located on expansive soil and would not create a direct or indirect risk to life or property. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to the Draft EIR page 4.4-13.

Septic Tanks and Alternative Wastewater Disposal Systems: No Impact

The proposed project would not include the use of septic tanks or alternative wastewater disposal systems because sanitary sewer and wastewater facilities are available in the vicinity of the project site. Therefore, the project would have no impact with respect to septic tanks or alternative wastewater disposal systems. No mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not require the use of septic tanks or alternative wastewater disposal systems. No impact would occur. Consequently, no mitigation measures are required for this no impact determination.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to the Draft EIR page 4.4-13.

4.8 Greenhouse Gas Emissions

Significant Impacts Related to Greenhouse Gas Emissions: Less Than Significant Impact

Demolition and construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, greenhouse gases (GHGs) would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels

creates GHGs such as carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change. It is estimated that the proposed project would generate a total of approximately 536.4 metric tons of carbon dioxide equivalent (MT CO_2e) during construction of the project. When annualized over the 30-year life of the project, annual emissions would be 17.9 MT CO_2e.

Long-term operation of the proposed project would generate GHG emissions from area, mobile, stationary, waste, and water sources as well as indirect emissions from sources associated with energy consumption. The proposed project would generate a total of 406 average daily trips (ADT), including 262 passenger vehicle trips, 50 two-axle truck trips, 16 three-axle truck trips, and 78 four-axle truck trips, which were included in California Emissions Estimator Model (CalEEMod). Existing uses would generate a total of 408 ADT.

Mobile sources would be the largest source of GHG emissions for the proposed project at approximately 61 percent of the total project emissions. Energy sources would be the next largest category at approximately 33 percent. Water sources would be approximately 4 percent of the total emissions, and waste sources would be approximately 2 percent of the total emissions. Area sources would be approximately less than 1 percent of the total emissions.

Based on the analysis results, the proposed project would result in a net increase of 2,925.9 metric tons of CO_2e per year (MT CO_2e/yr) over existing conditions, which would be below the numeric threshold of 3,000 MT CO_2e. Therefore, operation of the proposed project would not generate significant GHG emissions that would have a significant effect on the environment. As such, impacts related to operational GHG emissions would be less than significant. No mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to the Draft EIR pages 4.5-17 through 4.5-19.

Conflict with Applicable Greenhouse Gas Emissions Plan, Policy, Regulation: Less than Significant Impact

Applicable plans adopted for the purpose of reducing GHG emissions include the California Air Resources Board's (CARB) 2022 Scoping Plan Update and the Southern California Association of Governments' (SCAG) 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The proposed project would not conflict with the stated goals of the RTP/SCS; therefore, the proposed project would not interfere with SCAG's ability to achieve the region's GHG reduction

targets of 19 percent below 2005 per capita emissions levels by 2035, and it can be assumed that regional mobile emissions would decrease in line with the goals of the RTP/SCS.

The proposed project would consist of a 191,394-square-foot light industrial building. Based on the nature of the proposed project, it is anticipated that implementation of the proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS. Therefore, the proposed project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Impacts would be less than significant, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to the Draft EIR pages 4.5-19 through 4.5-21.

4.9 Hazards and Hazardous Materials

Significant Hazards Through the Routine Transport, Use, or Disposal of Hazardous Materials: Less Than Significant Impact

Construction of the proposed project would temporarily increase the regional transport, use, and disposal of construction-related hazardous materials and petroleum products (e.g., diesel fuel, lubricants, paints and solvents, and cement products containing strong basic or acidic chemicals). These materials are commonly used at construction sites, and the construction activities would be required to comply with applicable State and federal regulations for proper transport, use, storage, and disposal of excess hazardous materials and hazardous construction waste. In addition, Regulatory Compliance Measures HYD-1 and HYD-2, as detailed in Section 4.10, Hydrology and Water Quality, of this Initial Study, require compliance with the waste discharge permit requirements to avoid potential impacts to water quality due to spills or runoff from hazardous materials used during construction. Therefore, with adherence to the regulatory standards included in Regulatory Compliance Measures HYD-1 and HYD-2, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant.

The proposed project includes the development of one light industrial building with both warehouse and office uses. Warehouse and office uses typically do not present a hazard associated with the accidental release of hazardous substances into the environment. Operation of the proposed light industrial building would involve the use of materials common to all urban developments that are labeled hazardous such as solvents and commercial cleansers and petroleum products and would include the limited use of pesticide and herbicides for landscape maintenance. Trucks accessing the businesses on site would contain oil and gasoline to power their engines, which could have the

potential to result in minor releases of such substances through drips or leaks from truck loading areas.

Any hazardous materials associated with project operations would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. In addition, operation of the proposed project would not store, transport, generate, or dispose of large quantities of hazardous substances. Therefore, potential impacts from the routine transport, use, or disposal of hazardous materials resulting from operation of the proposed project would be less than significant, and no mitigation would be required.

The Orange County Fire Authority's (OCFA) Hazardous Material Division and the Orange County Environmental Health Department both identify types and amounts of waste generated in Orange County and establish programs for managing waste. The OCFA maintains a Hazardous Material Management Plan, which assures that adequate treatment and disposal capacity is available to manage the hazardous waste generated within the County and address issues related to the disposal, handling, processing, storage, and treatment of local hazardous materials and waste products.

The proposed project would be reviewed by the OCFA for hazardous material use, safe handling, and storage of materials. Prior to the issuance of grading permits, conditions of approval would be applied to the proposed project by the OCFA to reduce hazardous material impacts and ensure that any hazardous waste that is generated on site would be transported to an appropriate disposal facility by a licensed hauler in accordance with State and federal law. Therefore, due to the type and nature of the proposed project, its implementation would result in less than significant impacts related to the routine transport, use, or disposal of hazardous materials; no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required. However, Regulatory Compliance Measures HYD-1 and HYD-2 are applicable to the proposed project.

Supportive Evidence: Please refer to pages 4.9-1 through 4.9-3 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Significant Hazards Through Reasonably Foreseeable Upset and Accident Conditions Involving the Release of Hazardous Materials into the Environment: Less Than Significant Impact

The project site was historically used for agricultural purposes until approximately 1980. Based on the adjacent railroad line and historical agricultural use, pesticides or herbicides may have been utilized on the project site, and near-surface soils may have at one time contained these compounds. However, the soils on the project site were reworked when the project site was developed in the early 1990s, and, therefore, it is not anticipated that any hazardous materials in the soils remain related to

past agricultural use. The Phase I Environmental Site Assessment (ESA) concluded that there was no evidence of recognized environmental conditions at the project site.

The Phase I ESA also determined that the presence of lead-based paint (LBP) was unlikely as the existing office building was built around 1990, and risks related to LBP only apply to paint that is intact but was applied before 1977. In addition, the Phase I ESA determined that previous investigations on the project site indicated the presence of asbestos-containing materials (ACMs) in building materials. However, further investigations in the Asbestos Inspection Report for the project site concluded that no ACMs or asbestos containing construction materials (ACCMs) were used in the construction of the improvements at the site.

For the reasons described above, the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, impacts would be less than significant, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not create a significant hazard to the public or environment through the reasonably foreseeable upset and accident condition involving the release of hazardous material into the environment. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to page 4.9-3 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Hazardous Emissions or Handling Hazardous or Acutely Hazardous Materials, Substances, or Waste Within One-Quarter Mile of an Existing or Proposed School: Less Than Significant Impact

The closest schools to the project site are the Frank Vessels Elementary School (0.5 mile northeast) and Del Sol School (0.6 mile northwest). Therefore, there are no existing or proposed schools within 0.25 mile of the project site.

The proposed project is not anticipated to release hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste in significant quantities. Construction activities associated with the proposed project would use a limited amount of hazardous and flammable substances/oils during heavy equipment operation for site excavation, grading, and construction. The amount of hazardous chemicals present during construction would be limited and would be in compliance with existing government regulations. Future light industrial land uses would not require the use, storage, disposal, or transport of large volumes of hazardous materials that could cause serious environmental damage in the event of an accident. Although hazardous substances could be present and used at the proposed light industrial building, such substances are generally present now in the existing development on the project site, typically found in small quantities, and can be cleaned up without affecting the environment. Therefore, impacts related to hazardous emissions or handling of

hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school would be less than significant, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to pages 4.9-3 through 4.9-4 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Location on a Site Included on a List of Hazardous Materials Sites Compiled Pursuant to Government Code Section 65962.5, Creating a Significant Hazard to the Public or the Environment: Less Than Significant Impact

Under Government Code Section 65962.5, the California Department of Toxic Substances Control (DTSC) provides a list (Cortese List) of hazardous materials sites. The DTSC's data management system (EnviroStor) does not include any sites within the City of Cypress. Therefore, the project site is not on the list, impacts related to the project site's status on the list of hazardous materials sites would be less than significant, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to page 4.9-4 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Airport-Related Safety Hazards for People Residing or Working in the Project Area: Less Than Significant Impact

The project site is located approximately 0.25 mile north of the Joint Forces Training Base (JFTB) Los Alamitos. The facilities at JFTB Los Alamitos include two runways and associated taxiways, ramp space, and hangars. According to the Orange County Airport Land Use Commission's *Airport Environs Land Use Plan (AELUP) for Joint Forces Training Base Los Alamitos*, the project site is located in the Federal Aviation Administration's (FAA) Part 77 Notification Area (Exhibit D1) and the AELUP height restriction

zone for JFTB Los Alamitos. Height limitations are imposed on projects within a height restriction zone so that structures or trees (1) do not obstruct the airspace required for takeoff, flight, or landing of an aircraft at an airport, or (2) are not otherwise hazardous to the landing or takeoff of an aircraft.

Implementation of the proposed project would not result in a safety hazard for people working in the vicinity of the project site because the proposed project would include the demolition of the existing five-story office building on the project site and replace it with a one-story light industrial building that would not exceed 50 feet in height (the proposed building would have a maximum height of approximately 51 feet, 6 inches, to the top of the parapet). As such, the proposed building would be consistent with the height of surrounding land uses and would not penetrate the 100 to 1 imaginary surface that surrounds the runway at JFTB Los Alamitos. Impacts would be less than significant, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that, while located within an airport land use plan, the proposed project would not result in a safety hazard for people residing or working in the project area. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to pages 4.9-4 through 4.9-5 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Impairment or Interference with an Emergency Response Plan or Emergency Evacuation Plan: No Impact

The City's emergency evacuation routes are shown on Exhibit SAF-5 in the Safety Element (2001) of the City's General Plan. All emergency evacuation activities are coordinated by the City's Police Chief. The Police Chief would issue evacuation orders based on information gathered from emergency experts. Evacuation operations would be conducted by law enforcement agencies, highway/ road/street departments, and public and private transportation providers. The project site is located near Katella Avenue and Valley View Street, both of which are identified as emergency evacuation routes by the City. The proposed project does not include any modifications to Katella Avenue or Valley View Street and would not introduce any new driveways or other vehicular access points to either street. Therefore, the proposed project would not interfere with emergency operations and evacuations, and there would be no impact on emergency response. No mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. No impact would occur. Consequently, no mitigation measures are required for this no impact determination.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to page 4.9-5 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Significant Risk of Loss, Injury or Death Involving Wildland Fires: No Impact

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped areas of significant fire hazards in the State through its Fire and Resources Assessment Program (FRAP). These maps place areas of California into different fire hazard severity zones (FHSZ), based on a hazard scoring system using subjective criteria for fuels, fire history, terrain influences, housing densities, and occurrence of severe fire weather where urban conflagration could result in catastrophic losses. As part of this mapping system, CAL FIRE is responsible for wildland fire protection for land areas that are generally unincorporated, which are classified as State Responsibility Areas (SRAs). In areas where local fire protection agencies (e.g., OCFA) are responsible for wildfire protection, the lands are classified as Local Responsibility Areas (LRAs). CAL FIRE currently identifies the project site as an LRA.

In addition to establishing local or State responsibility for wildfire protection in a specific area, CAL FIRE designates areas as very high fire hazard severity zones (VHFHSZ) or non-VHFHSZ. According to the CAL FIRE Very High Fire Hazard Severity Zone Maps for the Orange County region, the entire City of Cypress is designated as a non-VHFHSZ, and the City does not include an SRA. The nearest VHFHSZ to the project site is approximately 10 miles to the northeast in Coyote Hills on the western side of Fullerton. The nearest SRA is in Puente Hills, approximately 12 miles northeast of the project site. Because the project site is not located in or near an SRA or VHFHSZ, the proposed project would not result in any impacts related to wildfire. No mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not expose people or structures to significant risk of loss, injury, or death involving wildland fires. No impact would occur. Consequently, no mitigation measures are required for this no impact determination.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to pages 4.9-5 through 4.9-6 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

4.10 Hydrology and Water Quality

Violation of Water Quality Standards or Waste Discharge Requirements, Water Quality Degradation: Less Than Significant Impact

Pollutants of concern during construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. During construction, the entirety of the project site would be graded and excavated, and 8.45 acres of soil would be disturbed**.** During construction activities, soil would be exposed and disturbed, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, and fuels), and

concrete-related waste may be spilled or leaked and have the potential to be transported via stormwater runoff into receiving waters. Sediment from increased soil erosion and chemicals from spills and leaks have the potential to be discharged to downstream receiving waters during storm events, which can affect water quality and impair beneficial uses.

Because construction of the proposed project would disturb greater than 1 acre of soil, the proposed project is subject to the requirements of the *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities,* Order No. 2022-0057-DWQ, National Pollutant Discharge Elimination System (NPDES) No. CAS000002, as specified in Regulatory Compliance Measure HYD-1. As also specified in Regulatory Compliance Measure HYD-1, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared and construction Best Management Practices (BMPs) detailed in the SWPPP would be implemented during construction, in compliance with the requirements of the Construction General Permit. The SWPPP would detail the BMPs to be implemented during construction. Construction BMPs would include, but not be limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site, and Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters. Compliance with the requirements of the Construction General Permit, including incorporation of construction BMPs to target and reduce pollutants of concern in stormwater runoff, would ensure that construction impacts related to waste discharge requirements, water quality standards, degradation of water quality, increased pollutant discharge, and alteration of receiving water quality, or impacts on surface water quality to marine, fresh, or wetland waters, would be less than significant.

According to the Geotechnical Evaluation (Appendix F of Draft EIR), borings encountered groundwater at depths of 6 to 9 feet below ground surface (bgs). Due to the presence of shallow groundwater, it is likely that groundwater dewatering would be required during excavation activities. Groundwater may contain high levels of total dissolved solids, nitrate, salinity, or other constituents, or high or low pH levels that could be introduced to surface waters when dewatered groundwater is discharged to receiving waters. If groundwater dewatering is necessary, groundwater would be discharged to either the sanitary sewer system or storm drain system. If discharged to the sanitary sewer system, a permit from the City of Cypress Public Works Department would be required, as specified in Regulatory Compliance Measure HYD-2, to ensure that there is sufficient capacity available to accommodate the discharge to prevent sanitary sewer overflow, which can result in a discharge of pollutants to surface waters. If groundwater is discharged to the storm drain system, coverage under the Santa Ana Regional Water Quality Control Board's (RWQCB) NPDES Permit *General Waste Discharge Requirements for Discharges to Surface Waters that Pose an Insignificant (De Minimis) Threat to Water Quality* (Order No. R8-2020-0006, NPDES No. CAG998001) would be required, as also specified in Regulatory Compliance Measure HYD-2. This permit requires testing and treatment (as necessary) of groundwater encountered during groundwater dewatering prior to release to the storm drain system. As a result, groundwater dewatering would not introduce pollutants to receiving waters at levels that would violate water quality standards or waste discharge requirements, degrade water quality, increase pollutant discharge, or alter the quality of the receiving water. Impacts to surface water quality from groundwater dewatering would be less than significant.

Expected pollutants of concern from long-term operation of the proposed project include suspended solids/sediment, nutrients, heavy metals, pathogens (bacteria/virus), pesticides, oil and grease, toxic organic compounds, and trash and debris.

The proposed project would comply with the requirements of the Santa Ana RWQCB's NPDES Permit *Waste Discharge Requirements for the County of Orange, Orange County Flood Control District, and the Incorporated Cities of Orange County within the Santa Ana Region Areawide Urban Storm Water Runoff Orange County* (Order No. R8-2009-0030, NPDES No. CAS618030, as amended by Order No. R8-2010-0062) (North Orange County MS4 Permit). The North Orange County MS4 Permit requires that a Water Quality Management Plan (WQMP) be prepared for priority new development and redevelopment projects. The preparation of a WQMP and compliance with the North Orange County MS4 Permit is specified in Regulatory Compliance Measure HYD-3**.**

WQMPs specify the BMPs that would be implemented to capture, treat, and reduce pollutants of concern in stormwater runoff. The Preliminary WQMP prepared for the project specifies the Source Control, Low Impact Development (LID) BMPs, and Treatment Control BMPs proposed for the project. Source Control BMPs are preventative measures that are implemented to prevent the introduction of pollutants into stormwater. LID BMPs mimic a project site's natural hydrology by using design measures that capture, filter, store, evaporate, detain, and infiltrate runoff rather than allowing runoff to flow directly to piped or impervious storm drains. Treatment Control BMPs are structural BMPs designed to treat and reduce pollutants in stormwater runoff prior to releasing it to receiving waters.

The BMPs specified in the Preliminary WQMP would be implemented and maintained, as specified in Regulatory Compliance Measure HYD-3. The proposed project BMPs are detailed below.

Proposed Structural Source Control BMPs include storm drain stenciling and signage; design and construct trash and waste storage areas to reduce pollution introduction; efficient irrigation systems and landscape design, water conservation, and smart controllers; and the incorporation of requirements applicable to loading dock areas from Santa Ana RWQCB's NPDES Permit. Proposed Non-structural Source Control BMPs include education for property owners, tenants, and occupants; activity restrictions; common area landscape management; BMP maintenance; common area litter control; employee training; housekeeping of loading docks; common area catch basin inspection, and; street sweeping private streets and parking lots.

Due to the high and seasonally mounded groundwater, traditional infiltration BMPs are not feasible for the proposed project. Proposed LID BMPs include a stormwater biofiltration system (Modular Wetland Systems), and a Hydrodynamic Separator to pre-treat stormwater entering the underground system. These proposed BMPS are also utilized as biotreatment BMPs. Stormwater runoff in the proposed condition would be collected by a series of area drains and proposed sump curb inlet catch basins and would be conveyed to an underground storage box in the southwestern parking lot area before being pumped to the proposed Modular Wetland Systems for treatment. The Modular Wetland Systems would treat street, roof, and landscape runoff for the proposed project, as well as reduce project-related flow rates into the existing storm drains by retaining and treating stormwater on the site. The proposed Modular Wetland Systems and catch basins would be designed with internal peak bypass and upstream diversion systems for conveyance of larger storm events. Treated and overflow stormwater from the Modular Wetland Systems would be conveyed via a proposed private

underground storm drain system to a public point of connection, then to an existing City public 48-inch storm drain system within Plaza Drive. Flows would then be conveyed from the 48-inch storm drain system to the Bolsa Chica Channel, then to Anaheim Bay, ultimately discharging to the Pacific Ocean.

The proposed BMPs would target and reduce pollutants of concern from runoff from the project site in compliance with the North Orange County MS4 Permit requirements. Compliance with the requirements of the North Orange County MS4 Permit, including incorporation of operational BMPs to target pollutants of concern (as specified in Regulatory Compliance Measure HYD-3), would ensure that water quality impacts related to waste discharge requirements, water quality standards, degradation of water quality, increased pollutant discharge, alteration of receiving water quality, or impacts on surface water quality to marine, fresh, or wetland waters during operation of the proposed project would be less than significant.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not violate water quality standards or waste discharge requirements, degrade water quality, increase pollutant discharges, or alter receiving water quality. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required. However, Regulatory Compliance Measures HYD-1 through HYD-3 would be applicable to the proposed project.

Supportive Evidence: Please refer to pages 4.10-1 through 4.10-6 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Depletion of Groundwater Supplies, Interference with Groundwater Recharge, and Impede Sustainable Groundwater Management of Basin: Less Than Significant Impact

According to the Geotechnical Evaluation (Appendix F of the Draft EIR) prepared for the proposed project, borings encountered groundwater at depths of 6 to 9 feet bgs. Due to the presence of shallow groundwater, it is likely that groundwater dewatering would be required during construction activities. However, groundwater dewatering would be localized and temporary, and the volume of groundwater removed would not be substantial. In addition, any volume of water removed during groundwater dewatering would be minimal compared to the size of the Coastal Plain of Orange County Groundwater Basin, which has a surface area of 350 square miles and a storage capacity of 38,000,000 acre-feet. Construction and operation of the proposed project would not involve direct groundwater extraction. Increased water use would not substantially affect groundwater supplies because the groundwater basin has been sustainably managed by the Orange County Water District (OCWD) over the last 10 years, and it is anticipated that the Coastal Plain of Orange County Groundwater Basin will continue to be sustainably managed with implementation of the Basin 8-1 Alternative. The Basin 8-1 Alternative establishes objectives and criteria for groundwater management within the Coastal Plain of Orange County Groundwater Basin, as required by the Sustainable Groundwater Management Act (SGMA). Therefore, construction and operational impacts

related to a decrease in groundwater supplies or interference with groundwater recharge would be less than significant, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not deplete groundwater supplies, interfere with groundwater recharge, or impede sustainable groundwater management of the basin. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to page 4.10-7 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Alter Existing Drainage Pattern, Substantial Erosion or Siltation, Increase Runoff Resulting in Flooding, Exceed Capacity of Stormwater Drainage, or Impede or Redirect Flood Flows: Less Than Significant Impact

During project construction activities, soil would be exposed and disturbed, drainage patterns would be temporarily altered during grading and other construction activities, and there would be an increased potential for soil erosion and siltation compared to existing conditions. Additionally, during a storm event, soil erosion and siltation could occur at an accelerated rate. Project construction would not alter the course of a stream or river. As discussed above, the Construction General Permit requires preparation of a SWPPP (Regulatory Compliance Measure HYD-1). The SWPPP would detail Erosion Control and Sediment Control BMPs to be implemented during project construction to minimize erosion and retain sediment on site. With compliance with the requirements of the Construction General Permit and with implementation of the construction BMPs, construction impacts related to on-site, off-site, or downstream erosion or siltation would be less than significant, and no mitigation is required.

According to the Preliminary WQMP prepared for the proposed project, the on-site impervious surface area would increase by approximately 28,374 square feet (a 9 percent increase) which would increase on-site stormwater flows. Impervious surface areas associated with development of the project site would not be prone to erosion or siltation, because no loose soil would be included in these areas. The on-site pervious surface area for the project would be 0.68 acre, and would contain landscaping that would minimize on-site erosion and siltation by stabilizing the soil. Therefore, on-site erosion and siltation impacts would be minimal.

As a result of the 28,374-square-foot increase in impervious surface area, the proposed project would increase runoff from the project site during storm events, which could increase off-site erosion and siltation. As discussed previously, the proposed BMPs include underground detention and Modular Wetland Systems, which would be designed to further reduce the volume of stormwater discharged to the local storm drain system off site.

According to the Preliminary WQMP, the project site is located in an area of hydrologic condition of concern (HCOC). Specifically, the project site is a tributary to the Bolsa Chica Channel, which has sections that are not concrete lined. Therefore, because the downstream receiving waters are susceptible to hydromodification, the proposed project has the potential to result in downstream erosion or siltation. However, as described in the Preliminary WQMP, the developed condition does not increase the storm volume or the time of concentration after implementation of the proposed project. For these reasons, the proposed project would not result in any new operational impacts related to substantial on- or off-site and downstream erosion or siltation, and this impact would be less than significant, and no mitigation is required.

As described above, the proposed project includes underground detention, Modular Wetland Systems, and catch basins to treat and reduce stormwater runoff from the project site. As demonstrated by the hydraulic modeling conducted as part of the Preliminary WQMP, the underground stormwater basin and Modular Wetland Systems would be designed to accommodate the design capture volume of 25,766 cubic feet for the entire project site. The Modular Wetland Systems would treat the required volume and would reduce the peak flow rate below the 10-year, 25-year, and 100-year pre-project peak flow rates. In addition, as specified in Regulatory Compliance Measure HYD-4, a Final Hydrology Study would be prepared based on final project plans and would be approved by the City. The Hydrology Study would confirm that the proposed project drainage facilities comply with City and County requirements. Furthermore, with implementation of the proposed BMPs, operational impacts related to runoff from the site or a substantial increase in the rate or amount of surface runoff, flow, and volume that would result in flooding would be less than significant, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not alter the existing drainage pattern in a manner that would result in substantial erosion or siltation, substantially increase rate of surface runoff that would result in flooding, create runoff that would exceed capacity of existing stormwater drainage systems, or impede or redirect flood flows. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required. However, Regulatory Compliance Measures HYD-1 and HYD-4 are applicable to the proposed project.

Supportive Evidence: Please refer to pages 4.10-7 through 4.10-10 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Location in Flood Hazard, Tsunami, Seiche Zones, Risk Release of Pollutants Due to Project Inundation: No Impact

The project site is not located within a 100-year floodplain. According to the Federal Emergency Management Agency (FEMA) Federal Insurance Rate Map (FIRM) No. 06059C0116J (December 3, 2009), the project site is located within Zone X, which comprises areas of 0.2 percent annual chance flood (500-year flood). As the project site is not located within a 100-year floodplain, the proposed project would not place housing or structures within a 100-year flood hazard area.

According to the Safety Element of the City's General Plan, the project site is located within the inundation zone of Prado Dam. There are no open bodies of water in the vicinity of the project site, and the proposed project is therefore not located within an inundation zone of a seiche. The project site is located approximately 6.3 miles northeast of the Pacific Ocean and is not located within a tsunami inundation zone, according to the Orange County Tsunami Inundation Maps. The levee inundation zone of Coyote Creek/Carbon Creek is located south of the project site; however, the project site is not located within this inundation area. Therefore, no impact from inundation by seiche, tsunami, or mudflow would occur, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project is not located in a flood hazard, tsunami, or seiche zone, and would not risk release of pollutants due to project inundation. No impacts would occur. Consequently, no mitigation measures are required for this no impact determination.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to page 4.10-10 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Conflict with Implementation of Water Quality Control Plan or Sustainable Groundwater Management Plan: Less Than Significant Impact

As discussed above, it is likely that groundwater dewatering would be required during construction activities. However, groundwater dewatering would be localized and temporary, and the volume of groundwater removed would not be substantial. In addition, any volume of water removed during groundwater dewatering would be minimal compared to the size of the Coastal Plain of the Orange County Groundwater Basin. Construction and operation of the proposed project would not involve direct groundwater extraction. Increased water use would not substantially affect groundwater supplies because the groundwater basin has been sustainably managed by OCWD over the last 10 years, and it is anticipated that the Coastal Plain of the Orange County Groundwater Basin would continue to be sustainably managed with implementation of the Basin 8-1 Alternative. Therefore, implementation of the proposed project would not conflict with or obstruct the sustainable groundwater management plan adopted for the Orange County Groundwater Basin. The proposed project would result in less than significant impacts, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not conflict with a water quality control plan or sustainable groundwater management plan. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to page 4.10-10 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

4.11 Land Use and Planning

Physical Division of an Established Community: Less Than Significant Impact

In its existing condition, the project site consists of approximately 8.53 acres of land currently developed with one five-story office building (150,626 square feet) and associated parking lot. The project site is located in a largely developed portion of the City of Cypress within the McDonnell Specific Plan that consists of numerous office/light industrial uses. The existing five-story office building would be demolished and replaced with a one-story light industrial building that would be approximately 191,394 square feet in size.

Although implementation of the proposed project would result in changes on the project site including the demolition of the existing office building, construction of the proposed light industrial building, a Lot Line Adjustment, and associated improvements, the proposed project would not result in substantial changes to the existing configuration of adjacent parcels. As such, the proposed project would not divide or separate any existing land uses or neighborhoods. Therefore, construction and implementation of the project would not result in the physical division of an established community. No mitigation would be required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not physically divide an established community. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to page 4.11-1 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Conflicts with Land Use Plans, Policies, or Regulations Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect: Less Than Significant Impact

Approval of the proposed project would not introduce any inconsistencies with the 2020–2045 Connect SoCal Plan, the City's General Plan, or the Cypress Municipal Code. Therefore, the proposed project would result in less than significant impacts related to potential conflicts with applicable land use plans, policies, and regulations. No mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to pages 4.11-1 through 4.11-8 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

4.12 Mineral Resources

All Thresholds: No Impacts

The project would not result in any impacts related to mineral resources as the project site is not part of a mineral resource zone containing any known valuable mineral resources. The project site has been classified by the California Geological Survey (CGS) as Mineral Resource Zone (MRZ)-4, indicating that the project site is in an area where information is inadequate for assignment to any other mineral resource zone. The City of Cypress is not within the proximity of any MRZ-2 zones, and is surrounded by an MRZ-1 zone, indicating the absence of significant mineral deposits in the area. Furthermore, according to the City's General Plan Environmental Impact Report, there are no mineral resources as defined by the California Division of Mines and Geology (CDMG; now known as the California Geological Survey or CGS) within the City. Therefore, no significant impacts related to the loss of availability of a known mineral resource or a locally important mineral resource that would be of value to the region and to the residents of the State would result from project implementation, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not generate substantial impacts to any known mineral resource that would be of value to the region or any locally important mineral resource recovery site. Therefore, no impact would occur and no mitigation measures are required.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to pages 4.12-1 through 4.12-2 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

4.13 Noise

Substantial Temporary or Permanent Increase in Ambient Noise Levels: Less Than Significant Impact

Short-term noise impacts would be associated with demolition of the existing office building, excavation, grading, and construction of the proposed structure. Construction-related short-term noise levels would be higher than existing ambient noise levels in the vicinity of the project site at the present time but would no longer occur once construction of the proposed project is completed. The combination of the equipment during the site preparation and grading phases, considering the usage factor of each piece of equipment, would result in a combined noise level of 59 A-weighted decibel equivalent continuous sound level (dBA L_{eq}) at a distance of 1,300 feet, which represents the distance from the center of construction activity at the project site to the nearest noise-sensitive hotel use (Courtyard by Marriott) to the southeast. While construction-related short-term noise levels have the potential to be higher than existing ambient noise levels in the vicinity of the project site under existing conditions, the noise impacts would no longer occur once project construction is completed. During deep dynamic compaction activities, the major source of noise would be the crane utilized to

drop the weight. Construction noise levels would be similar to those during building construction as that construction phase would also include the operation of a crane. Although construction noise would be higher than the ambient noise in the vicinity of the project site, it would cease to occur once project construction is completed. Additionally, with the incorporation of Regulatory Compliance Measure NOI-1, all feasible and reasonable measures to reduce construction noise would be implemented, and a less than significant impact would occur.

The increase in noise associated with project-related traffic would be very small, ranging from 0.0 to 1.7 dBA along the analyzed road segments. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. These noise level increases are not perceptible by the human ear. Therefore, off-site traffic noise impacts would be less than significant. No mitigation is required.

Implementation of the proposed project would generate various on-site stationary noise sources, including heating, ventilation, and air conditioning (HVAC) and dock operations. The project would have various rooftop mechanical equipment, including HVAC units, on the proposed building. To be conservative, it is assumed the project could have four (4) rooftop HVAC units that would operate 24 hours per day and would generate sound power levels (SPL) of up to 76 dBA SPL or 63 dBA L_{eq} at 5 feet. Noise levels generated by delivery trucks would be similar to noise readings from truck loading and unloading activities, which generate a noise level of 75 dBA L_{eq} at 20 feet. To present a conservative assessment, it is assumed that unloading activities could occur at half of the 25 docks simultaneously for a period of more than 30 minutes in a given hour. Additionally, at the remaining half of the loading docks, it is conservatively assumed that refrigeration units attached to the trailers would be in operation while waiting to be unloaded. Based on reference measurements, each unit would have a reference noise level of 79.4 dBA at 15 feet. The proposed project would not substantially increase noise levels over existing conditions. Additionally, the proposed project will generate daytime and nighttime operational noise level increases ranging from 60 to 55 dBA L_{eq}. The estimated noise level at the closest noise-sensitive uses would be less than 34 dBA L_{eq}. Additionally, the proposed project would not substantially increase noise levels over existing conditions. Therefore, this impact would be less than significant. No mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required. However, Regulatory Compliance Measure NOI-1 is applicable to the proposed project.

Supportive Evidence: Please refer to the Draft EIR pages 4.6-13 through 4.6-19.

Excessive Noise Levels Due to Proximity to an Airport: Less Than Significant Impact

The closest airport to the project site is Joint Forces Training Base (JFTB) Los Alamitos, which is located approximately 0.4 mile to the southwest. The noise contour boundaries of JFTB Los Alamitos show that the project site is located outside of Noise Impact Zone 2 (60 decibel [dB] Community Noise Equivalent Level [CNEL] or greater); therefore, this impact would be less than significant. No mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not expose people residing or working in the project area to excessive noise levels due to proximity to an airport. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to the Draft EIR page 4.6-21.

4.14 Population and Housing

Substantial Unplanned Population Growth: Less Than Significant Impact

The proposed project would include the demolition of the existing office building on the project site and the construction of a new one-story light industrial building as well as associated site improvements including landscaping, surface parking, and utility improvements. The proposed project would not cause or result in direct population growth because the proposed project would not provide new housing on the project site. The proposed light industrial building is anticipated to generate approximately 93 employees.

As of November 2023, the City of Cypress had a labor force of 25,100, and the County of Orange had a labor force of 1,607,700, with approximately 9,655 and 61,143 people unemployed, respectively.[1] The November 2023 unemployment rate was 3.8 percent for the City and 3.8 percent for the County.[2] It is unlikely that a substantial number of employees would need to be relocated from outside the region to meet the need for employees resulting from implementation of the proposed project. Furthermore, the proposed project would be located within a developed area of Cypress that is already served by all utilities. The existing regional infrastructure and the established roadway network would be utilized by employees accessing the project site and would not indirectly or directly induce population growth.

1 State of California Employment Development Department (EDD). 2023. *Monthly Labor Force Data for Cities and Census Designated Places, November 2023.* Website: https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Flabormarketinfo.edd.ca.gov%2Ffile%2Flfmonth%2Foransub.xls&wdOrigin=BROWSELINK (accessed December 5, 2023).

2 Ibid.

Operation of the proposed project would not induce substantial population growth or accelerate development in an underdeveloped area, and any impacts to population growth would be less than significant. No mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not induce substantial unplanned population growth in the area, either directly or indirectly. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to page 4.14-1 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Displacement of People or Housing Resulting in Need for Replacement Housing: No Impact

As previously stated, the project proposes to demolish the existing office building on the project site and construct a new light industrial building as well as associated site improvements including landscaping, surface parking, and utility improvements. There are no existing housing units or people living on the project site. Therefore, the project would not displace housing or persons, nor require or necessitate the development of replacement housing elsewhere. No mitigation would be required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. The project would result in no impacts. Consequently, no mitigation measures are required for this no impact determination.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to page 4.14-2 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

4.15 Public Services

Fire Protection Services: Less Than Significant Impact

As a non-residential project, the proposed project would not be expected to result in an excessive increase in calls for service. In addition, as discussed in Section 4.17, Transportation, the proposed project would not result in inadequate emergency access.

Further, the City's Safety Element states that separation and setback requirements, adopted in the City's Municipal Code, assist in minimizing the risk of urban fire spread. The proposed project would be consistent with the City's setback requirements. In addition, as discussed in further detail in Section 4.20, Wildfire, the project site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ).

The proposed project would adhere to the development standards described in the City's Municipal Code related to public safety. The proposed project would also be designed to comply with all OCFA requirements, including providing adequate fire flow/structure protection to the project site and providing adequate access for emergency vehicles. Additionally, the proposed project would comply with current editions of the California Building Code, the California Fire Code, and related codes.

As stated in Section 4.14, Population and Housing, the proposed project would not induce substantial population growth in the City and therefore would be able to be served by Fire Station No. 17. The OCFA would review and comment on the site plan prior to approval. As part of the review, the OCFA would impose standard conditions of approval, which would ensure all impacts regarding fire protection would be less than significant. Therefore, the proposed project would not require the construction of new fire protection facilities or the upgrade of existing facilities, which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection. Therefore, impacts associated with fire protection services would be less than significant, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not generate substantial impacts relating to fire protection services. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required. However, Regulatory Compliance Measure PS-1 would be applicable to the proposed project.

Supportive Evidence: Please refer to pages 4.15-1 through 4.15-3 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Police Protection Services: Less Than Significant Impact

The proposed project would not increase the City's population, as it proposes a non-residential development. The project site is currently developed with existing office uses; the proposed project would introduce light industrial uses, which are anticipated to require a demand for police services similar to or slightly less than the existing uses on the project site. Therefore, the project would have no impact on the Cypress Police Department's ratio of police officers per 1,000 residents and would not trigger the need for new or physically altered police facilities. Impacts to police services would be less than significant, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not generate substantial impacts relating to police protection services. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to pages 4.15-3 through 4.15-4 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Schools: Less Than Significant Impact

The proposed project would include the demolition of the existing office building on the project site and the construction of a new light industrial building, as well as associated site improvements including landscaping, surface parking, and utility improvements. The proposed project would not cause or result in direct population growth because the proposed project would not provide new housing on the project site.

Pursuant to California Education Code Section 17620(a)(1), the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district for the purpose of funding the construction or reconstruction of school facilities. As a light industrial project, the proposed project would not add any students because it does not include any new housing. Nevertheless, the Applicant would be required to pay school fees to reduce any impacts of new residential development on school services as provided in Section 65995 of the California Government Code (refer to Regulatory Compliance Measure PS-1, below). The fees are collected by the Anaheim Union High School District (AUHSD) and shared with Cypress School District (CSD).

Pursuant to the provisions of Government Code Section 65996, a project's impact on school facilities is fully mitigated through payment of the requisite school facility development fees current at the time a building permit is issued. Therefore, with payment of the required fees, as outlined in Regulatory Compliance Measure PS-1, potential impacts to school services and facilities associated with implementation of the proposed project would be less than significant. No mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not generate substantial impacts relating to school facilities. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required. However, Regulatory Compliance Measure PS-1 would be applicable to the proposed project.

Supportive Evidence: Please refer to pages 4.15-4 through 4.15-5 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Parks: Less Than Significant Impact

The proposed project would not directly generate new residents to the City's population as it is a non-residential development. The project does not propose any residential uses and, therefore, would not increase the population or demand related to parks. Although the project is anticipated to increase the City's employment by 93 jobs, the number of employees would be minor compared to the amount of parks and recreational space within the City. While it is possible that employees may visit parks and

recreational facilities in the City during lunch breaks or after-work hours, it is unlikely that the use of parks by project employees would increase the use of those parks to a level that would contribute to substantial physical deterioration of those facilities. Impacts to parks and recreation facilities would be less than significant, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not generate substantial impacts relating to parks. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to page 4.15-5 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Other Public Facilities: Less Than Significant Impact

The Cypress Senior Center, which provides a variety of services for senior residents, is located at 9031 Grindlay Street, approximately 1.8 mile north of the project site. The Cypress Community Center, which provides regular classes and programming for local residents, is located at 5700 Orange Avenue, approximately 1.3 mile north of the project site. The proposed project would not generate population growth as it is a non-residential development and would not generate an increased demand for the use of these public facilities. Therefore, it is reasonable to assume that the proposed project would not result in adverse physical impacts to these facilities. Impacts to other public facilities would be less than significant, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not generate substantial impacts to other public facilities beyond those identified in the Initial Study. Less than significant impacts are anticipated. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to page 4.15-5 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

4.16 Recreation

Deterioration of Parks and Other Recreation Facilities: Less Than Significant Impact

The project does not propose any residential uses and, therefore, would not increase the population or demand related to parks. Although the project is anticipated to increase employment by 93 jobs, the number of employees would be minor compared to the amount of parks and recreational space within the City. While it is possible that employees may visit parks and recreational facilities in the City during lunch breaks or after-work hours, it is unlikely that the use of parks by project employees

would increase the use of those parks to a level that would contribute to substantial physical deterioration of those facilities. Therefore, the impact would be less than significant, and no mitigation would be required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not increase the use of existing neighborhood and regional parks or other recreation facilities such that substantial physical deterioration of the facility would occur or be accelerated. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to pages 4.16-1 through 4.16-2 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Construction or Expansion of Recreational Facilities Resulting in an Adverse Physical Effect: Less Than Significant Impact

In its existing condition, the project site is currently developed with a five-story office building and associated parking lot. The proposed project includes the demolition of the existing structure, and development of a new one-story light industrial building. The project would not include recreational facilities nor develop residential uses that would require the construction or expansion of recreational facilities that might have an adverse effect on the environment. Therefore, impacts to recreation requirements would be less than significant.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, potential impacts would be less than significant. No mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to page 4.16-2 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

4.17 Transportation

Conflict with a Program, Plan, Ordinance or Policy Related to the Circulation System: Less Than Significant Impact

The proposed project is anticipated to generate a net increase of 196 two-way trips per day with a net reduction of 28 a.m. peak hour trips and a net reduction of 22 p.m. peak hour trips (in passenger car equivalents [PCE]). Since the proposed project is likely to generate fewer than 50 net new peak-hour trips and fewer than 25 net new peak-hour trips at any single intersection, the implementation

of the proposed project is not anticipated to result in any operational or level of service (LOS) deficiencies; therefore, no further study is necessary.

The City's General Plan provides goals and policies to implement a balanced, functional, and efficient circulation system, and incorporate alternative modes of travel that allow for the safe movement of people and goods. General Plan Policies CIR-2.5 and CIR-2.8 encourage the development of adequate sidewalks, particularly to provide connections to surrounding alternative modes of transportation. The project site currently provides sidewalks along Plaza Drive and Walker Drive allowing for pedestrian connections to nearby transit. Therefore, the proposed project would not inhibit the use of alternative transportation in the area and would not conflict with circulation policies in the General Plan. Impacts would be less than significant, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Potential impacts are less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to the Draft EIR pages 4.7-11 through 4.7-12.

Conflicts or Inconsistencies with CEQA Guidelines Section 15064.3(b): Less Than Significant Impact

The Governor's Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR Technical Advisory) recommends that a project generating 110 average daily trips (ADT) or less be screened out of a vehicle miles traveled (VMT) analysis due to the presumption of a less than significant impact. This recommendation is not based on any analysis of GHG reduction but is instead based on the potential trip generation of a project that would be categorically exempt under CEQA. The proposed project includes the demolition of 150,626 square feet of office space and the construction of a new light industrial building that would be approximately 191,394 square feet in size. The proposed project does not qualify for any of the screening criteria, including the screening threshold for small projects because the proposed project would generate a net increase of 196 ADT and a total of 604 ADT. Therefore, a detailed VMT analysis was prepared.

Additionally, the proposed project would constitute a significant impact if the project VMT metric is greater than 85 percent of the regional existing VMT metric. Hence the proposed project would constitute a significant impact if the project VMT per employee is greater than 85 percent of the Orange County VMT per employee (threshold). The project's VMT per employee would be lower than the Orange County regional threshold; therefore, the proposed project would have a less than significant impact related to VMT, and no mitigation measures are required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Potential impacts are less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to the Draft EIR pages 4.7-12 through 4.7-13.

Inadequate Emergency Access: Less Than Significant Impact

Vehicular access to the project site would be provided via two driveways at Plaza Drive and Douglas Drive. Plaza Drive would allow for adequate emergency access and all project improvements, including driveways, would be designed consistent with applicable emergency access standards. All emergency access routes to the proposed project and adjacent areas would be kept cleared and unobstructed during demolition and construction of the proposed project. No roadway closures or lane closures are anticipated as part of project construction. Therefore, the proposed project's effects on emergency access would be less than significant, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not result in inadequate emergency access. Potential impacts are less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to the Draft EIR page 4.7-14.

4.18 Tribal Cultural Resources

Adverse Change in the Significance of a Tribal Cultural Resource That is Listed or Eligible for Listing in the California Register or in a Local Register of Historical Resources as Defined in PRC Section 5020.1(k): No Impact

The project site does not contain any "historical resources" as defined by CEQA. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines or Public Resources Code 5020.1(k).

Native American consultation was conducted in compliance with Assembly Bill 52. As part of the consultation process, a review of the Sacred Lands File by the Native American Heritage Commission (NAHC) yielded negative results. Subsequently 21 Native American representatives were contacted by the City to determine their desire to consult on the proposed project. During that process, the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) stated that the project site is within their tribal territory and requested consultation with the City. The Kizh Nation was provided with a summary of the project and its location. No information regarding specific known tribal cultural resources on the project site was provided by the Kizh Nation. Therefore, the proposed project would

not result in any impacts to tribal cultural resources that are listed or eligible for listing in the State or local register of historical resources. No mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not generate any impacts on tribal cultural resources that are listed or eligible for listing in the State or local register of historical resources. No impacts would occur. Consequently, no mitigation measures are required for this no impact determination.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to the Draft EIR pages 4.8-5 through 4.8-6.

4.19 Utilities and Service Systems

Relocation or Construction of New or Expanded Water, Wastewater Treatment, Stormwater Drainage, Electric Power, Natural Gas, or Telecommunication Facilities That Would Cause a Significant Environmental Effect: Less Than Significant Impact

The proposed project would not require or result in the relocation or construction of new or expanded facilities for water, wastewater treatment, storm drainage, electric power, natural gas, or telecommunications. With implementation of Regulatory Compliance Measure UTIL-1, included here, and Regulatory Compliance Measure HYD-4, in Section 4.10, Hydrology and Water Quality, existing facilities would have the capacity to serve the anticipated uses, and the proposed project would not substantially increase demand upon these facilities as compared to historic and existing conditions at the project site. Therefore, impacts to these utility facilities would be less than significant.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities that would cause a significant environmental effect. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required. However, Regulatory Compliance Measure UTIL-1 and Regulatory Compliance Measure HYD-4 would be applicable to the proposed project.

Supportive Evidence: Please refer to page 4.19-1 through 4.19-9 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Insufficient Water Supplies: Less Than Significant Impact

The proposed project would not necessitate new or expanded water entitlements, and Golden State Water Company (GSWC) would be able to accommodate the increased demand for potable water under a worst-case scenario as forecast in the 2020 Urban Water Management Plan (UWMP). Taking

into account population growth, GSWC is able to meet demand in the multiple dry year scenario for years 2025, 2030, 2035, 2040, and 2045. The proposed project is anticipated to use approximately 122,345 gallons per day (gpd) or 137 acre-feet per year (afy). Further, the total amount of anticipated water usage by the proposed project represents less than 0.1 percent of the West Orange System's current annual water demand. Additionally, the proposed project would be required to implement Regulatory Compliance Measure UTIL-2, which requires the proposed project to comply with all State laws for water conservation measures, including the use of low-flow fixtures. Therefore, water demand from the proposed project would be within GSWC's current and projected water supplies available to serve the proposed project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts related to water supplies would be less than significant, and no mitigation would be required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future developments during normal, dry, and multiple dry years. Impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required. However, Regulatory Compliance Measure UTIL-2 would be applicable to the proposed project.

Supportive Evidence: Please refer to page 4.19-9 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Inadequate Capacity to Serve Projected Wastewater Treatment Demand in Addition to the Provider's Existing Commitments: Less Than Significant Impact

Although the proposed project would increase wastewater generation on site, the increased wastewater flows from the proposed project could be accommodated within the existing design capacity of Orange County Sanitation District's (OC SAN) Treatment Plant No. 1, which would serve the project site. Therefore, the City's Public Works Maintenance Division and OC SAN would have adequate capacity to serve the projected demand of the proposed project in addition to their existing commitments. Therefore, impacts related to wastewater treatment would be less than significant, and no mitigation would be required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would be adequately served by the wastewater treatment provider's existing capacity in addition to the provider's existing commitments. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to page 4.19-10 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Solid Waste Generation in Excess of State or Local Standards or Capacity of Local Infrastructure: Less Than Significant Impact

Non-hazardous waste from construction activities associated with the proposed project would be recycled to the extent feasible, and where necessary, would likely be disposed of at the Olinda Alpha Landfill. Construction waste is anticipated to be minimal compared to waste generated throughout the lifetime of the project during operation. The proposed project is not anticipated to result in a significant production of solid waste that would exceed the daily available capacity (1,000 tons per day [tpd]) at the Olinda Alpha Landfill, the proposed project would not result in an impact related to City, State, or federal statutes and regulations related to solid wastes. The proposed project would generate approximately 0.49 tpd (980 pounds) of solid waste during operation, a net increase of approximately 0.48 tpd (960 pounds) over the existing uses on the project site. Therefore, the proposed project would contribute an insignificant amount of solid waste per day to the remaining daily capacity at the Olinda Alpha Landfill (approximately 0.61 percent). Moreover, the proposed project would not impair the attainment of solid waste reduction goals. Therefore, the proposed project would result in a less than significant impact to solid waste and landfill facilities, and no mitigation would be required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to pages 4.19-10 through 4.19-11 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

Conflict with Federal, State, and Local Solid Waste Management and Reduction Statutes and Regulations: Less Than Significant Impact

Implementation of the proposed project involves the demolition of the existing structure on the site, site grading, and construction of the proposed light industrial building on the project site. Demolition, site preparation (vegetation removal, grading, and filling activities) and construction activities would generate typical construction debris, including wood, paper, glass, metals, cardboard, and green wastes. The proposed project would comply with the City's Construction and Demolition Ordinance (Regulatory Compliance Measure UTIL-3).

The proposed project would comply with existing and future statutes and regulations, including waste diversion programs mandated by City, State, and federal law. In addition, the proposed project would not result in an excessive production of solid waste that would exceed the capacity of the existing

landfill serving the project site. Therefore, the proposed project would not result in an impact related to federal, State, and local statutes and regulations related to solid wastes, and no mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would comply with federal, State, and local management and reduction statutes and regulations associated with solid waste. Potential impacts would be less than significant. Consequently, no mitigation measures are required for this less than significant impact.

Mitigation Measures: No mitigation is required. However, Regulatory Compliance Measure UTIL-3 would be applicable to the proposed project.

Supportive Evidence: Please refer to pages 4.19-11 through 4.19-13 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

4.20 Wildfire

All Thresholds: No Impact

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped areas of significant fire hazards in the State through its Fire and Resources Assessment Program (FRAP). These maps place areas of California into different fire hazard severity zones (FHSZ), based on a hazard scoring system using subjective criteria for fuels, fire history, terrain influences, housing densities, and occurrence of severe fire weather where urban conflagration could result in catastrophic losses. As part of this mapping system, CAL FIRE is responsible for wildland fire protection for land areas that are generally unincorporated, and they are classified as State Responsibility Areas (SRAs). In areas where local fire protection agencies (e.g., Orange County Fire Authority [OCFA]) are responsible for wildfire protection, the lands are classified as Local Responsibility Areas (LRAs). CAL FIRE currently identifies the project site as an LRA. In addition to establishing local or State responsibility for wildfire protection in a specific area, CAL FIRE designates areas as very high fire hazard severity zones (VHFHSZ) or non-VHFHSZ.

According to the CAL FIRE Very High Fire Hazard Severity Zone Maps for the Orange County region, the entire City of Cypress is designated as a non-VHFHSZ, and the City does not include an SRA. The nearest VHFHSZ to the project site is approximately 10 miles to the northeast in Coyote Hills on the western side of Fullerton. The nearest SRA is in Puente Hills, approximately 12 miles northeast of the project site. Because the project site is not located in or near an SRA or VHFHSZ, the proposed project would not result in any impacts related to wildfire. No mitigation is required.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project would not result in any impacts related to wildfire. Consequently, no mitigation measures are required for this no impact determination.

Mitigation Measures: No mitigation is required.

Supportive Evidence: Please refer to pages 4.20-1 through 4.20-2 of the Initial Study prepared for the proposed project (included as Appendix B to the Draft EIR).

5.0 FINDINGS REGARDING POTENTIALLY SIGNIFICANT ENVIRONMENTAL IMPACTS WHICH CAN BE MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

The City finds, based upon the threshold criteria for significance presented in the Draft EIR, that the potentially significant environmental effects of the proposed project listed below can be avoided or reduced to insignificance with feasible mitigation measures identified in the Draft EIR. No substantial evidence has been submitted to or identified by the City that indicates that the following impacts would, in fact, occur at levels that would necessitate a determination of significance.

CEQA Guidelines, Section 15126(b), requires a description of any significant environmental effects that cannot be avoided if the proposed project is implemented.

5.1 Aesthetics

No impacts were concluded to be significant.

5.2 Agriculture and Forestry Resources

No impacts were concluded to be significant.

5.3 Air Quality

No impacts were concluded to be significant.

5.4 Biological Resources

No impacts were concluded to be significant.

5.5 Cultural Resources

Adverse Change in the Significance of an Archaeological Resource: Less Than Significant with Mitigation Incorporated

According to the City of Cypress General Plan, there are no known archaeological resources located in Cypress. The project site has been previously disturbed to construct an office building and a surface parking lot. The existing office building at the project site would be demolished, materials removed or repurposed, and the entirety of the site would be graded for the construction of the proposed project. During site preparation/grading activities, there is the potential to encounter unknown cultural resources. In the event that historical or archaeological resources are encountered during grading and construction, operations shall cease and Mitigation Measure CUL-1 would be implemented. With the implementation of Mitigation Measure CUL-1, project impacts to archaeological resources would be less than significant with mitigation incorporated.

Finding: The City adopts CEQA Finding 1.

Pursuant to Public Resources Code Section 21081(a) and State CEQA Guidelines Section 15091(a), the City hereby finds that changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant effect on the environment to below a level of significance with Mitigation Measure CUL-1.

Mitigation Measures: Based upon the analysis presented in Section 4.2, Cultural Resources, of the Draft EIR, which is incorporated herein by reference, Mitigation Measure CUL-1 below is feasible and made binding through the MMRP. Imposition of this mitigation measure will reduce potentially significant impacts to less than significant.

Mitigation Measure CUL-1 **Unknown Archaeological Resources.** In the event that archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the Orange County List of Qualified Archaeologists has evaluated the find in accordance with federal, State, and local guidelines to determine whether the find constitutes a "unique archaeological resource," as defined in Section 21083.2(g) of the California Public Resources Code (PRC). The Applicant and its construction contractor shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the project site. Any found deposits shall be treated in accordance with federal, State and local guidelines, including those set forth in PRC Section 21083.2, and shall be assessed, handled, and treated consistent with accepted standards, such as the Secretary of the Interior's standards and guidelines for archaeology and historic preservation. Prior to commencement of grading activities, the Director of the City of Cypress (City) Community Development Department, or designee, shall verify that all project grading and construction plans include specific requirements regarding California PRC (Section 21083.2[g]) and the treatment of archaeological resources as specified above.

Supportive Evidence: Please refer to the Draft EIR pages 4.2-6 through 4.2-9.

5.6 Energy

No impacts were concluded to be significant.

5.7 Geology and Soils

Adverse Effects Related to Seismic-Related Ground Failure Including Liquefaction: Less Than Significant with Mitigation Incorporated

According to the California Geological Survey's EQ Zapp, the project site is located in a Liquefaction Hazards Zone of required investigations. The Geotechnical Evaluation included a subsurface exploration and has determined the presence of potentially liquefiable soils to depths of 50 feet.

Further analysis determined potential dynamic settlements of approximately 2.9 inches to 5.27 inches during a strong seismic event.

This dynamic settlement as a result of severe seismic activity is expected to occur over a large area and would result in areal subsidence, and the potential differential settlement is expected to be significantly less over any relatively small segment. However, given the nature of the proposed project, which includes a light industrial facility with office and warehouse uses, differential settlements under current conditions could be significant. Thus, remedial grading, foundation considerations, and/or in-situ ground improvement measures are recommended in the Geotechnical Evaluation to help mitigate potential adverse effects due to soil liquefaction.

Mitigation Measure GEO-1 requires the construction contractor to comply with the recommendations in the Geotechnical Evaluation to reduce the proposed project's impact related to liquefaction. Therefore, with implementation of Mitigation Measure GEO-1, the proposed project's impacts related to liquefaction would be reduced to less than significant. The project would also be required to adhere to Regulatory Compliance Measure GEO-1.

Finding: The City adopts CEQA Finding 1.

Pursuant to Public Resources Code Section 21081(a) and State CEQA Guidelines Section 15091(a), the City hereby finds that changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant effect on the environment to below a level of significance with Mitigation Measure GEO-1.

Mitigation Measures: Based upon the analysis presented in Section 4.4, Geology and Soils, of the Draft EIR, which is incorporated herein by reference, Mitigation Measure (MM) GEO-1 below is feasible and made binding through the MMRP. Imposition of this mitigation measure will reduce potentially significant impacts to less than significant.

MM GEO-1 **Implementation of Geotechnical Evaluation Recommendations.** The Applicant's construction contractor shall implement the recommendations of the Geotechnical Evaluation prepared for the proposed project, as applicable, to the satisfaction of the City of Cypress' (City) Building Official, or designee. The City's Building Official, or designee, shall confirm recommendations have been implemented into the design and construction of the proposed project prior to the issuance of a building permit.

Supportive Evidence: Please refer to the Draft EIR pages 4.4-10 through 4.4-11.

Location on Unstable Geologic Unit Resulting in Landslide, Lateral Spreading, Subsidence, Liquefaction, or Collapse: Less Than Significant with Mitigation Incorporated

As discussed in detail under Threshold GEO-1(iii) in the Draft EIR, implementation of Mitigation Measure GEO-1 and adherence to the regulatory standards described in Regulatory Compliance Measure GEO-1 would be required to address the proposed project's impacts with respect to

liquefaction. Provided that design and remedial grading and ground improvement (as necessary) are performed in accordance with the applicable requirements in the California Building Code (adopted by the City as its Building Code with certain amendments), and current standards of practice in the area, excessive settlement resulting from liquefaction and compression of existing undocumented fill and some layers of loose sands and silty sands on the project site would be reduced to a less than significant level.

Finding: The City adopts CEQA Finding 1.

Pursuant to Public Resources Code Section 21081(a) and State CEQA Guidelines Section 15091(a), the City hereby finds that changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant effect on the environment to below a level of significance with Mitigation Measure GEO-1.

Mitigation Measures: Based upon the analysis presented in Section 4.4, Geology and Soils, of the Draft EIR, which is incorporated herein by reference, Mitigation Measure (MM) GEO-1 below is feasible and made binding through the MMRP. Imposition of this mitigation measure will reduce potentially significant impacts to less than significant.

MM GEO-1 **Implementation of Geotechnical Evaluation Recommendations.** The Applicant's construction contractor shall implement the recommendations of the Geotechnical Evaluation prepared for the proposed project, as applicable, to the satisfaction of the City of Cypress' (City) Building Official, or designee. The City's Building Official, or designee, shall confirm recommendations have been implemented into the design and construction of the proposed project prior to the issuance of a building permit.

Supportive Evidence: Please refer to Draft EIR pages 4.4-12 through 4.4-13.

Directly or Indirectly Destroy Unique Paleontological Resource or Site or Unique Geologic Feature: Less Than Significant with Mitigation Incorporated

The project site contains Artificial Fill, which has no paleontological sensitivity, and Young Alluvium, Unit 2, which has low paleontological sensitivity from the surface to a depth of 10 feet and high paleontological sensitivity below 10 feet. With a maximum excavation depth of 8 feet during construction, the proposed project is expected to remain in deposits with no or low paleontological sensitivity. However, in the event that paleontological resources are encountered during construction, Mitigation Measure GEO-2 would require work in the immediate area of the discovery to be halted and a qualified paleontologist to assess the discovery. These procedures would reduce potential impacts to scientifically significant nonrenewable paleontological resources encountered during construction.

Finding: The City adopts CEQA Finding 1.

Pursuant to Public Resources Code Section 21081(a) and State CEQA Guidelines Section 15091(a), the City hereby finds that changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant effect on the environment to below a level of significance with Mitigation Measure GEO-2.

Mitigation Measures: Based upon the analysis presented in Section 4.4, Geology and Soils, of the Draft EIR, which is incorporated herein by reference, Mitigation Measure (MM) GEO-2 below is feasible and made binding through the MMRP. Imposition of this mitigation measure will reduce potentially significant impacts to less than significant.

MM GEO-2 **Procedures for Unexpected Paleontological Resources Discoveries.** In the event that paleontological resources are encountered, work in the immediate area of the discovery shall be halted and the Applicant shall retain a professional paleontologist who meets the qualifications established by the Society of Vertebrate Paleontology to assess the discovery. The qualified, professional paleontologist shall make recommendations regarding the treatment and disposition of the discovered resources, as well as the need for subsequent paleontological mitigation, which may include, but not be limited to, paleontological monitoring, collection of observed resources, preservation, stabilization and identification of collected resources, curation of resources into a museum repository, and preparation of a monitoring report of findings, consistent with well accepted standards, such as those established by the Society of Vertebrate Paleontology. The City of Cypress shall ensure that the recommendations from the qualified, professional paleontologist shall be followed by the Applicant.

Supportive Evidence: Please refer to the Draft EIR page 4.4-13.

5.8 Greenhouse Gas Emissions

No impacts were concluded to be significant.

5.9 Hazards and Hazardous Materials

No impacts were concluded to be significant.

5.10 Hydrology and Water Quality

No impacts were concluded to be significant.

5.11 Land Use and Planning

No impacts were concluded to be significant.

5.12 Mineral Resources

No impacts were concluded to be significant.

5.13 Noise

Generation of Excessive Groundborne Vibration or Groundborne Noise Levels

Construction of the proposed project could result in the generation of ground-borne vibration. For typical construction activity, the equipment with the highest vibration generation potential is the large bulldozer, which would generate 0.089 inch per second (in/sec) in peak particle velocity (PPV) at 25 feet. The closest surrounding buildings to the project site include existing industrial buildings located approximately 5 feet north of the edge of the project site. The industrial building would experience vibration levels of up to 0.995 in/sec PPV. This vibration level at the nearest building from construction equipment would potentially exceed the Federal Transit Administration (FTA) threshold of 0.5 in/sec PPV for building damage. At a distance of approximately 8 feet from typical construction activities, vibration levels would approach 0.492 in/sec PPV and would be below the FTA criteria of 0.5 in/sec PPV. While construction could result in vibration damage, impacts would be reduced to less than significant, and the potential for building damage would be eliminated with the incorporation of Mitigation Measure NOI-1 as detailed below.

For deep dynamic compaction (DDC) construction activities, the proposed drops could occur as close as 50 feet from the nearest structures. The nearest off-site industrial building to the DDC construction activities would experience vibration levels of up to 1.02 in/sec PPV, which would potentially exceed the FTA threshold of 0.5 in/sec PPV for building damage. At a distance of approximately 78 feet from DDC construction activities, vibration levels would be 0.49 in/sec PPV and would be below the FTA criteria of 0.5 in/sec PPV. While construction could result in vibration damage, impacts would be reduced to less than significant, and the potential for building damage would be eliminated with the incorporation of Mitigation Measure NOI-1.

Finding: The City adopts CEQA Finding 1.

Pursuant to Public Resources Code Section 21081(a) and State CEQA Guidelines Section 15091(a), the City hereby finds that changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant effect on the environment to below a level of significance with Mitigation Measure NOI-1.

Mitigation Measures: Based upon the analysis presented in Section 4.6, Noise, of the Draft EIR, which is incorporated herein by reference, Mitigation Measure (MM) NOI-1 below is feasible and made binding through the MMRP. Imposition of this mitigation measure will reduce potentially significant impacts to less than significant.

MM NOI-1	**Construction Vibration Monitoring Plan.** Due to the close proximity to surrounding structures, the City of Cypress (City) Director of Community Development, or designee, shall verify prior to issuance of demolition or grading permits, that the approved plans require that the construction contractor implement the following mitigation measures during project construction activities in the event that the use of heavy equipment is necessary within 25 feet (ft) of surrounding structures or when deep dynamic compaction (DDC)

construction activity takes places within 80 ft of surrounding structures:

- Notification to nearby businesses detailing the schedule and duration of DDC activities.

- Structures that are located within 25 ft of heavy construction activities and within 80 ft of DDC construction activity that have the potential to be affected by ground-borne vibration shall be identified. This task shall be conducted by a qualified structural engineer as approved by the City's Director of Community Development, or designee.

- The Applicant's construction contractor shall develop a vibration monitoring and construction contingency plan for approval by the City's Director of Community Development, or designee, to identify appropriate locations where monitoring would be conducted; set up a vibration monitoring schedule; define structure-specific maximum vibration limits based on building inspections; contain provisions to conduct photo, elevation, and crack surveys to document before and after construction conditions at those structures. The plan shall identify construction contingencies that would be implemented if vibration levels approach the established vibration limits at a particular location. Potential contingencies may include one or more of the following:

  - Lowering the height of the compaction weight;

  - Using a lighter compaction weight; or

  - Any other alternate method that is safe and appropriate, as determined by the project geotechnical consultant, in consultation with the City's Director of Community Development (such as utilizing geopier stabilization instead of DDC).

- At a minimum, vibration during initial site preparation activities at the locations described above shall be monitored. The monitoring results may indicate the need for more or less intensive measurements.

- When vibration levels approach the applicable limits established in the vibration monitoring and construction contingency plan, construction shall be suspended, and the appropriate mitigation

measures identified in the construction contingency plan shall be implemented to reduce vibration levels below thresholds.

Supportive Evidence: Please refer to the Draft EIR pages 4.6-19 through 4.6-21.

5.14 Population and Housing

No impacts were concluded to be significant.

5.15 Public Services

No impacts were concluded to be significant.

5.16 Recreation

No impacts were concluded to be significant.

5.17 Transportation

Increase Hazards Due to a Geometric Design Feature: Less Than Significant with Mitigation Incorporated

Vehicular traffic to and from the project site would utilize the existing network of regional and local roadways that serve the project area. Access to the project site would be provided via two driveways at Plaza Drive and Douglas Drive. The proposed project would include the relocation of the existing driveways. The new westernmost driveway would be the primary truck access point and path to the truck loading docks on the proposed building's west side. The eastern driveway would be a shared driveway with the parcel to the east.

It is anticipated that Driveway 1 (on Douglas Drive) and Driveway 2 (on Plaza Drive) would be utilized by heavy trucks to access the project site. Driveway 1 is anticipated to be able to accommodate the ingress and egress of heavy trucks as currently designed, providing access to and from the east on Plaza Drive and south on Douglas Drive. Driveway 1 would serve as the primary driveway for heavy trucks accessing the project site. While Driveway 2 would accommodate the ingress and egress of heavy trucks along Plaza Drive, it is recommended that the northwest curb of Driveway 2 be modified to accommodate a 25-foot curb radius for the egress of heavy trucks. Implementation of Mitigation Measure TRA-1, described below, would require the installation of on-site traffic signing and striping to direct heavy trucks to the driveway on Douglas Drive. With implementation of Mitigation Measure TRA-1, the proposed project would have a less than significant impact related to transportation hazards.

Finding: The City adopts CEQA Finding 1.

Pursuant to Public Resources Code Section 21081(a) *and State CEQA Guidelines* Section 15091(a), the City hereby finds that changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant effect on the environment to below a level of significance with Mitigation Measure TRA-1.

Mitigation Measures: Based upon the analysis presented in Section 4.7, Transportation, of the Draft EIR, which is incorporated herein by reference, Mitigation Measure (MM) TRA-1 below is feasible and made binding through the MMRP. Imposition of this mitigation measure will reduce potentially significant impacts to less than significant.

MM TRA-1 **Truck Access & Routing Plan and Truck Signage and Striping Plan.** The Applicant shall submit a Truck Access and Routing Plan to accommodate the circulation of trucks on site. Additionally, the Applicant shall prepare a Signage and Striping Plan, consistent with the provisions of the California Manual on Uniform Traffic Control Devices (CA MUTCD), that directs heavy trucks to the most appropriate access point. The Public Works Director of the City of Cypress, or designee, shall review and approve the Truck Access and Routing Plan and Signage and Striping Plan and confirm they have been incorporated into the project plans prior to the issuance of a building permit.

Supportive Evidence: Please refer to the Draft EIR page 4.7-14.

5.18 Tribal Cultural Resources

Adverse Change in the Significance of a Tribal Cultural Resource That is Determined by Lead Agency to Be Significant Pursuant to Criteria in Subdivision (c) of Public Resources Code Section 5024.1: Less Than Significant with Mitigation Incorporated

The project site is not likely to contain any prehistoric site or archaeological resources based on archival research and field surveys conducted for the project site. There is little potential for the proposed project to impact prehistoric resources due to the low likelihood of resource presence, significant prior disturbance from past grading and development activities on the project site and in the surrounding area. However**,** Mitigation Measure CUL-1, as provided in Section 4.2, Cultural Resources, of the Draft EIR, has been included to mitigate potentially significant impacts associated with the unlikely discovery of archaeological resources, including tribal cultural resources (TCRs), on the project site. Therefore, implementation of Mitigation Measure CUL-1 would reduce potentially significant impacts to unknown tribal cultural resources to a less than significant level.

During the consultation process, the Kizh Nation provided mitigation measures to address potential impacts related to tribal cultural resources. Implementation of Mitigation Measures TCR-1 through TCR-3, which incorporate the recommendations of the Kizh Nation, would reduce any potential impacts to previously undiscovered tribal cultural resources to a less than significant level. Therefore, on this basis and as a result of the City's consultation with the Kizh Nation or any other interested local Native American tribe, the City has concluded that, with implementation of Mitigation Measures TCR-1 through TCR-3, potential impacts related to unknown buried tribal cultural resources would also be reduced below a level of significance.

Finding: The City adopts CEQA Finding 1.

Pursuant to Public Resources Code Section 21081(a) and State CEQA Guidelines Section 15091(a), the City hereby finds that changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant effect on the environment to below a level of significance with Mitigation Measures TRC-1 through TCR-3.

Mitigation Measures: Based upon the analysis presented in Section 4.8, Tribal Cultural Resources, of the Draft EIR, which is incorporated herein by reference, Mitigation Measures (MMs) TCR-1 through TCR-3 below are feasible and made binding through the MMRP. Imposition of these mitigation measures will reduce potentially significant impacts to less than significant.

MM TCR-1

Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities. The project Applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation). The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground- disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project Applicant/lead agency upon written request to the Tribe.

On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh Nation from a designated point of contact for the project Applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with

the project are complete; or (2) a determination and written notification by the Kizh Nation to the project Applicant/lead agency that no future, planned construction activity and/or development/ construction phase at the project site possesses the potential to impact Kizh Nation TCRs.

Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh Nation monitor and/or Kizh Nation archaeologist. The Kizh Nation will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

MM TCR-2

Unanticipated Discovery of Human Remains and Associated Funerary Objects. Native American human remains are defined in Public Resources Code 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.

Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh Nation determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh Nation monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)

Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

MM TCR-3 **Procedures for Burials and Funerary Remains.** As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.

If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.

The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.

In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.

In the event preservation in place is not possible despite good faith efforts by the project Applicant/developer and/or landowner, before

ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.

Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

Supportive Evidence: Please refer to the Draft EIR pages 4.8-6 through 4.8-11.

5.19 Utilities and Service Systems

No impacts were concluded to be significant.

5.20 Wildfire

No impacts were concluded to be significant.

6.0 FINDINGS REGARDING SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS WHICH CANNOT BE MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

6.1 Aesthetics

No impacts were concluded to be significant and unavoidable.

6.2 Agriculture and Forestry Resources

No impacts were concluded to be significant and unavoidable.

6.3 Air Quality

No impacts were concluded to be significant and unavoidable.

6.4 Biological Resources

No impacts were concluded to be significant and unavoidable.

6.5 Cultural Resources

No impacts were concluded to be significant and unavoidable.

6.6 Energy

No impacts were concluded to be significant and unavoidable.

6.7 Geology and Soils

No impacts were concluded to be significant and unavoidable.

6.8 Greenhouse Gas Emissions

No impacts were concluded to be significant and unavoidable.

6.9 Hazards and Hazardous Materials

No impacts were concluded to be significant and unavoidable.

6.10 Hydrology and Water Quality

No impacts were concluded to be significant and unavoidable.

6.11 Land Use and Planning

No impacts were concluded to be significant and unavoidable.

6.12 Mineral Resources

No impacts were concluded to be significant and unavoidable.

6.13 Noise

No impacts were concluded to be significant and unavoidable.

6.14 Population and Housing

No impacts were concluded to be significant and unavoidable.

6.15 Public Services

No impacts were concluded to be significant and unavoidable.

6.16 Recreation

No impacts were concluded to be significant and unavoidable.

6.17 Transportation

No impacts were concluded to be significant and unavoidable.

6.18 Tribal Cultural Resources

No impacts were concluded to be significant and unavoidable.

6.19 Utilities

No impacts were concluded to be significant and unavoidable.

6.20 Wildfire

No impacts were concluded to be significant and unavoidable.

7.0 FINDINGS REGARDING GROWTH INDUCING IMPACTS

State CEQA Guidelines Sections 15126(d) and 15126.2(e) require that an EIR analyze growth-inducing impacts and discuss the ways in which a proposed project could foster economic or population growth or construction of additional housing, either directly or indirectly, in the surrounding environment. State CEQA Guidelines Section 15126.2(d) also requires a discussion of the characteristics of projects that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. To address these issues, potential growth-inducing effects were examined through analysis of the following questions:

- Would the project remove obstacles to, or otherwise foster, population growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development)?

- Would the project foster economic growth?

- Would approval of the project involve some characteristic that may encourage and facilitate other activities that could significantly affect the environment?

Growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment (State CEQA Guidelines Section 15126.2(e)). This issue is presented to provide additional information on ways in which the proposed project could contribute to significant changes in the environment beyond the direct consequences of developing the proposed land uses as described in earlier sections of this Draft EIR.

The area surrounding the project site is highly urbanized and developed with a variety of industrial, commercial, office, and warehouse land uses. The proposed project will require water, sewer, drainage, electricity, and natural gas lines. However, the project site is currently developed and located in a highly urbanized environment where these facilities already exist in place. It is not anticipated that the proposed project would require substantial utility infrastructure improvements.

The construction of the proposed project is anticipated to generate a number of construction-related jobs. However, as discussed in Section 4.14 of the Initial Study prepared for the proposed project (see Appendix B of the Draft EIR), it is unlikely that a substantial number of employees would need to be relocated from outside the region to meet the need for employees resulting from implementation of the proposed project. In addition, the proposed project would not provide or remove housing on the project site. it is unlikely that the employment offered by the proposed project would cause people to move or relocate to the area solely for the purpose of being close to the project site. Accordingly, the proposed project would not induce either short- nor long-term population growth.

In its existing condition, the project site is developed with an underutilized five-story office building. The project site currently does not generate revenue for the City. The proposed project would provide a new source of property tax revenues to the City, thereby increasing the local tax base. Therefore, the proposed project would foster economic growth.

The proposed project includes the development of a light industrial facility. The proposed project would require an amendment to the McDonnell Specific Plan to allow light industrial uses in the eastern portion of Planning Area 1, and removal of the maximum developable area requirement while retaining the 1.0:1 floor-area ratio (FAR) to maintain consistency with the General Plan. This amendment would not allow for residential uses or add any permanent residents to the project site. Therefore, the project would not directly increase the City's population beyond existing levels. The proposed Specific Plan Amendment (SPA) would not cause a future increase in density or land use. Accordingly, the proposed project would not have any growth-inducing impacts.

Finding: The City adopts CEQA Finding 1.

The City hereby finds that the proposed project does not directly result in any significant growth-inducing impacts. The proposed project does not include or facilitate any physical improvements or development, and the proposed project is consistent with planned regional housing growth and planned population growth of the City.

Supportive Evidence: Please refer to the Draft EIR pages 6-1 through 6-2.

8.0 FINDINGS REGARDING PROJECT ALTERNATIVES

The following alternatives were addressed in the Draft EIR:

- Alternative 1: No Project Alternative
- Alternative 2: Reduced Footprint Alternative
- Alternative 3: No Refrigeration Warehouse Alternative
- Alternative 4: Deep Dynamic Compaction and Stone Columns

8.1 Alternative 1: No Project Alternative

Description: Consistent with State CEQA Guidelines Section 15126.6, the No Project Alternative assumes the existing land uses and condition of the project site at the time the Notice of Preparation (NOP) was published (May 2024) would continue to exist without any changes. The No Project Alternative represents the environmental conditions that would exist if no new development of any kind were to occur on the project site. The No Project Alternative would allow existing conditions on the project site to remain unchanged. While the No Project Alternative would lessen or avoid impacts of the proposed project and require no mitigation measures, none of the project objectives would be achieved.

Finding – The City adopts Finding 3.

The City finds that while the No Project Alternative would eliminate the impacts associated with the proposed project, as well as those impacts determined to be less than significant, it would not meet any of the project objectives. Since the project site would remain undeveloped and vacant, this alternative would not: (1) meet a greater market demand for state-of-the-art light industrial buildings by replacing a vacant office building; (2) realize the City's industrial goal, policies, and programs to strengthen its economic base; (3) promote development that would attract new businesses to operate in the City; (4) encourage business development that would generate a range of employment opportunities for the community; or (5) help attract new business enterprises that would result in a positive flow of revenue to the City. As a result, this alternative would not meet the objectives of the proposed project.

Supporting Evidence – Please see the Draft EIR pages 5-7 through 5-10.

8.2 Alternative 2: Reduced Footprint Alternative

Description: The purpose of the Reduced Footprint Alternative is to reduce the proposed light industrial square footage and facility footprint, which are the primary sources of project-related air quality, greenhouse gas, and transportation impacts. The Reduced Footprint Alternative would develop a smaller light industrial building (127,596 square feet, which is 63,798 square feet less than the proposed project) on the same site as the proposed project. It can be assumed that construction methods, equipment, and activities would be similar for both the proposed project and this alternative. It can also be assumed that alterations to topography and vegetation on the site would be similar for both developments. The same regulations, ordinances, standards, and policies applicable to the proposed project would also be applicable to this alternative. The reduced

development proposed under this development would also reduce the capacity and employment opportunities of the project.

Finding – The City adopts Finding 3.

The City finds that the Reduced Footprint Alternative would result in lesser levels of impact in most of the environmental impact areas, with the exception of Cultural Resources, Geology and Soils, and Tribal Cultural Resources, in which impacts would be similar to those under the proposed project. The Reduced Footprint Alternative would fulfill the project objectives to a lesser extent and would not provide the same capacity or employment opportunities as the proposed project. As such, this alternative would only partially meet project objectives.

Supporting Evidence – Please see the Draft EIR pages 5-10 through 5-14.

8.3 Alternative 3: No Refrigeration Warehouse Alternative

Description: The purpose of the No Refrigeration Warehouse Alternative is to eliminate cold storage space in the proposed light industrial building and truck refrigeration units, which are the primary source of project-related operational air quality impacts and GHG emissions. The No Refrigeration Warehouse Alternative would develop the same use as the proposed project on the same project site. As such, it can be assumed that construction methods, equipment, and activities would be similar for both the proposed project and this alternative. It can also be assumed that alterations to topography and vegetation on the site would be similar for both developments. The same regulations, ordinances, standards, and policies applicable to the proposed project would also be applicable to this alternative.

Finding – The City adopts CEQA Finding 3.

The City finds that the No Refrigeration Warehouse Alternative would result in lesser levels of impact in most of the environmental impact areas, with the exception of Cultural Resources, Geology and Soils, and Tribal Cultural Resources, in which impacts would be similar to those under the proposed project. While the No Refrigeration Warehouse Alternative would reduce the operational emissions of criteria pollutants, operational GHG emissions, operational energy consumption, and stationary noise levels, when compared with the proposed project, this alternative would not totally fulfill Project Objectives 2 and 4, as warehouse projects without cold storage would by definition exclude certain users and generally not be as competitive as warehouses with cold storage. As such, this alternative would only partially meet project objectives.

Supporting Evidence – Please see the Draft EIR pages 5-14 through 5-18.

8.4 Alternative 4: Deep Dynamic Compaction and Stone Columns Alternative

Description: The purpose of the Deep Dynamic Compaction and Stone Columns Alternative is to reduce vibratory impacts to sensitive receptors within the vicinity of the proposed project. The Deep Dynamic Compaction and Stone Columns Alternative would include the same building footprint as the proposed project; however, the Deep Dynamic Compaction and Stone Columns Alternative would only include the use of deep dynamic compaction activities within the central portion of the project site and would utilize stone columns around the periphery of the project site during construction. The

Deep Dynamic Compaction and Stone Columns Alternative would reduce impacts to ground-borne vibration during project construction when compared with the proposed project. As such, it can be assumed that construction methods, equipment, and activities would be similar for both the proposed project and this alternative. It can also be assumed that alterations to topography and vegetation on the site would be similar for both developments. The same regulations, ordinances, standards, and policies applicable to the proposed project would also be applicable to this alternative.

Finding – The City adopts CEQA Finding 3.

The City finds that all impacts under the Deep Dynamic and Stone Columns Alternative would be similar to the proposed project. The Deep Dynamic Compaction and Stone Columns Alternative would reduce impacts to ground-borne vibration during project construction from "Less than Significant with Mitigation Incorporated" to "Less than Significant" when compared with the proposed project. As a result, this alternative would fulfill all of the project objectives to the same degree as the proposed project.

Supporting Evidence – Please see the Draft EIR pages 5-18 through 5-22.

9.0 FINDINGS REGARDING THE MITIGATION MONITORING AND REPORTING PROGRAM

Section 21081.6 of the Public Resources Code requires that when making findings required by Section 21081(a) of the Public Resources Code, the Lead Agency approving a project shall adopt a reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval, in order to ensure compliance with project implementation and to mitigate or avoid significant effects on the environment. The City hereby finds that:

1) A Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the proposed project, and the mitigation measures are included therein. The MMRP is incorporated herein by reference and is considered part of the record of proceedings for the proposed project.

2) The MMRP designates responsibility for implementation and monitoring of proposed mitigation measures. The City's Community Development Director will serve as the overall MMRP coordinator and will be primarily responsible for ensuring that all mitigation measures are complied with.

3) The MMRP prepared for the proposed project has been adopted concurrently with these Findings. The MMRP meets the requirements of Section 21021.6 of the Public Resources Code. The City will use the MMRP to track compliance with mitigation measures. The MMRP will remain available for public review during the compliance period.

10.0 OTHER FINDINGS

The City hereby finds as follows:

1) The foregoing statements are true and correct.

2) The City is the "Lead Agency" for the project evaluated in the CEQA Documents and independently reviewed and analyzed in the Draft EIR and Final EIR for the project.

3) The Notice of Preparation of the Draft EIR was circulated for public review. It requested that responsible agencies respond as to the scope and content of the environmental information germane to that agency's specific responsibilities.

4) The public review period for the Draft EIR occurred for 45 days between August 12, 2024, and September 27, 2024. The Draft EIR and appendices were available for public review during that time. A Notice of Completion and copies of the Draft EIR were sent to the State Clearinghouse, and notices of availability of the Draft EIR were published by the City. The Draft EIR was available for review on the City's website. Physical copies of the environmental documents are available at the Cypress Civic Center by appointment only.

5) The CEQA Documents were completed in compliance with CEQA.

6) The CEQA Documents reflect the City's independent judgment.

7) The City evaluated comments on environmental issues received from persons and organizations who reviewed the Draft EIR. In accordance with CEQA, the City prepared written responses describing the disposition of significant environmental issues raised. The Final EIR provided adequate, good faith, and reasoned responses to the comments. The City reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information to the Draft EIR regarding adverse environmental impacts. The City has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these Findings, concerning the environmental impacts identified and analyzed in the Final EIR.

8) The City finds that the CEQA Documents, as amended, provide objective information to assist the decision-makers and the public at large in their consideration of the environmental consequences of the project. The public review period provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit all comments made during the public review period.

9) The CEQA Documents evaluated the following impacts: (1) air quality; (2) cultural resources; (3) energy; (4) geology and soils; (5) greenhouse gas emissions; (6) noise; (7) transportation; and (8) tribal cultural resources. Additionally, the CEQA Documents considered, in separate sections, significant irreversible environmental changes and growth-inducing impacts of the project, as well as a reasonable range of project alternatives. All of the significant environmental impacts of the project were identified in the CEQA Documents.

10) The MMRP includes all of the mitigation measures identified in the CEQA Documents and has been designed to ensure compliance during implementation of the project. The MMRP provides the steps necessary to ensure that the mitigation measures are fully enforceable.

11) The MMRP designates responsibility and anticipated timing for the implementation of mitigation; the City's Community Development Director will serve as the MMRP Coordinator.

12) In determining whether the project may have a significant impact on the environment, and in adopting these Findings pursuant to Section 21081 of CEQA, the City has complied with CEQA Sections 21081.5 and 21082.2.

13) The impacts of the project have been analyzed to the extent feasible at the time of certification of the CEQA Documents.

14) The City made no decisions related to approval of the project prior to the initial recommendation of certification of the CEQA Documents. The City also did not commit to a definite course of action with respect to the project prior to the initial consideration of the CEQA Documents.

15) Copies of all the documents incorporated by reference in the CEQA Documents are and have been available upon request at all times at the offices of the City of Cypress Community Development Department, the custodian of record for such documents or other materials.

16) The responses to the comments on the Draft EIR, which are contained in the Final EIR, clarify and amplify the analysis in the Draft EIR.

17) Having reviewed the information contained in the CEQA Documents and in the administrative record, the City finds that there is no new significant information regarding adverse environmental impacts of the project in the Final EIR.

18) Having received, reviewed and considered all information in the CEQA Documents, as well as all other information in the record of proceedings on this matter, these Findings are hereby adopted by the City in its capacity as the CEQA Lead Agency.

Exhibit B

Mitigation Monitoring and Reporting Program

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
including those set forth in PRC Section 21083.2. Prior to commencement of grading activities, the Director of the City of Cypress (City) Community Development Department, or designee, shall verify that all project grading and construction plans include specific requirements regarding California PRC (Section 21083.2[g]) and the treatment of archaeological resources as specified above.					
Regulatory Compliance Measure CUL-1 **Human Remains.** In the event that human remains are encountered on the project site, work within 50 feet of the discovery shall be redirected and the County Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the City of Cypress shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Prior to the issuance of grading permits, the Director of the City of Cypress Community Development Department, or designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.	During construction activities	Construction Supervisor/Applicant			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
4.6: Energy					
Regulatory Compliance Measure EN-1 Limit Idling Time. The Applicant and construction contractor would be required to comply with applicable idling regulations for on-road vehicles during project construction and operation, which require truck drivers to turn off their engines within 5 minutes of idling.	Prior to issuance of a building permit	Applicant and City of Cypress Community Development Director, or designee			
4.7: Geology and Soils					
Regulatory Compliance Measure GEO-1 **Compliance with Seismic and Building Standards in the Building Code.** Prior to issuance of the first building permit for the proposed buildings, the City of Cypress (City) Engineer, Building Official, or their designee, and the project soils engineer shall review the building plans to verify that the structural design conforms to the requirements of the City's latest adopted edition of the California Building Standards Code. Structures and walls shall be designed in accordance with applicable sections of the City's Building Code.	Prior to issuance of building permits	Applicant and City of Cypress Engineer, Building official, or designee			
Mitigation Measure GEO-1 **Implementation of Geotechnical Evaluation Recommendations.** The Applicant's construction contractor shall implement the recommendations of the Geotechnical Evaluation prepared for the proposed project, as applicable, to the satisfaction of the City of Cypress' (City) Building Official, or designee. The City's Building Official, or designee, shall confirm recommendations have been implemented into the design and construction of the proposed project prior to the issuance of a building permit.	Prior to issuance of building permits	Applicant and City of Cypress Building official, or designee			
Mitigation Measure GEO-2 **Procedures for Unexpected Paleontological Resources Discoveries.** In the event that paleontological resources are encountered, work in the immediate area of the discovery shall be halted and the Applicant shall retain a professional Paleontologist	During ground-disturbing activities	Applicant and/or Construction Supervisor/City of Cypress Director of Community Development			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
who meets the qualifications established by the Society of Vertebrate Paleontology to assess the discovery. The qualified, professional Paleontologist shall make recommendations regarding the treatment and disposition of the discovered resources, as well as the need for subsequent paleontological mitigation, which may include, but not be limited to, paleontological monitoring, collection of observed resources, preservation, stabilization and identification of collected resources, curation of resources into a museum repository, and preparation of a monitoring report of findings. The City of Cypress shall ensure that the recommendations from the qualified, professional Paleontologist shall be followed by the Applicant.		Department, or designee			
4.10: Hydrology and Water Quality					
Regulatory Compliance Measure HYD-1 Construction General Permit. Prior to commencement of construction activities, the Applicant shall obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), NPDES No. CAS000002, Order No. 2022-0057-DWQ, National Pollutant Discharge Elimination System (NPDES) No. CAS000002. This shall include submission of Permit Registration Documents (PRDs), including permit application fees, a Notice of Intent (NOI), a risk assessment, a site plan, a Stormwater Pollution Prevention Plan (SWPPP), a signed certification statement, and any other compliance-related documents required by the permit, to the State Water Resources Control Board via the Stormwater Multiple Application and Report Tracking System (SMARTS). Construction activities shall not commence until a Waste Discharge Identification Number (WDID) is obtained for the project from the SMARTS and provided to the Director of the City of Cypress Community Development Department, or designee, to demonstrate that coverage under the Construction General Permit has been obtained. Project	Prior to commencement of construction activities	Applicant and/or Construction Supervisor/City of Cypress Director of Community Development Department, or designee			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
construction shall comply with all applicable requirements specified in the Construction General Permit, including, but not limited to, preparation of a SWPPP and implementation of construction site best management practices (BMPs) to address all construction-related activities, equipment, and materials that have the potential to impact water quality for the appropriate risk level identified for the project. The SWPPP shall identify the sources of pollutants that may affect the quality of stormwater and shall include BMPs (e.g., Sediment Control, Erosion Control, and Good Housekeeping BMPs) to control the pollutants in stormwater runoff. Construction Site BMPs shall also conform to the requirements specified in the latest edition of the Orange County Stormwater Program Construction Runoff Guidance Manual for Contractors, Project Owners, and Developers to control and minimize the impacts of construction and construction-related activities, materials, and pollutants on the watershed. Upon completion of construction activities and stabilization of the project site, a Notice of Termination shall be submitted via SMARTS.					
Regulatory Compliance Measure HYD-2 If groundwater dewatering is required during construction or excavation activities and the dewatered groundwater is discharged to the sanitary sewer system, the Applicant shall obtain a discharge permit from the Director of the City of Cypress Public Works Department. If the dewatered groundwater is discharged to the storm drain system, the Applicant shall obtain coverage under the *General Waste Discharge Requirements for Discharges to Surface Waters that Pose an Insignificant (De Minimis) Threat to Water Quality (*Order No. R8-2020-0006, NPDES No. CAG998001), which covers discharges to surface waters that pose an insignificant (de minimis) threat to water quality within. This shall include submission of a Notice of Intent for coverage under the permit to the RWQCB at least 45 days prior to the start of dewatering. The Applicant shall provide the	Prior to commencement of construction activities	Applicant and/or Construction Supervisor/City of Cypress Director of Public Works, or designee			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
Waste Discharge Identification Number (WDID) to the Director of the City's Public Works Department, or designee, to demonstrate proof of coverage under the *De Minimis* Permit. Groundwater dewatering shall not be initiated until a WDID is received from the Santa Ana Regional Water Quality Control Board (RWQCB) and is provided to the Director of the City's Public Works Department, or designee. Groundwater dewatering activities shall comply with all applicable provisions in the permit, including water sampling, analysis, treatment (if required), and reporting of dewatering-related discharges. Upon completion of groundwater dewatering activities, a Notice of Termination shall be submitted to the Santa Ana RWQCB.					
Regulatory Compliance Measure HYD-3 **Water Quality Management Plan.** Prior to the issuance of grading or building permits, the Applicant shall submit a Final Water Quality Management Plan (WQMP) to the City of Cypress Engineer, or designee, for review and approval in compliance with the requirements of the *Waste Discharge Requirements for the County of Orange, Orange County Flood Control District, and the Incorporated Cities of Orange County within the Santa Ana Region Areawide Urban Storm Water Runoff Orange County (Order No. R8-2009-0030, NPDES No. CAS618030, as amended by Order No. R8-2010-0062) (North Orange County MS4 Permit)*. The Final WQMP shall be prepared consistent with the requirements of the *Technical Guidance Document for Water Quality Management Plans* (December 2013) and the Water Quality Management Plan template, or subsequent guidance manuals. The Final WQMP shall specify the BMPs to be incorporated into the project design to target pollutants of concern in runoff from the project site. The City shall ensure that the BMPs specified in the Final WQMP are incorporated into the final project design.	Prior to issuance of grading or building permits	Applicant and City of Cypress Engineer, or designee			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
Regulatory Compliance Measure HYD-4 Final Hydrology and Hydraulic Analysis. The Applicant shall submit a Final Hydrology Study to the City of Cypress Director of Public Works, or his/her designee, for review and approval prior to issuance of grading and building permits. The Final Hydrology Study shall be prepared consistent with the requirements of the *Orange County Hydrology Manual* (Orange County Environment Agency 1986) and *Orange County Hydrology Manual Addendum No. 1* (Orange County Environment Agency 1996), or subsequent guidance manuals. The Final Hydrology Study shall demonstrate that the on-site drainage facilities and post-project Best Management Practices (BMPs) (e.g., Modular Wetland Systems) are designed in compliance with the requirements of the *Waste Discharge Requirements for the County of Orange, Orange County Flood Control District, and the Incorporated Cities of Orange County within the Santa Ana Region Areawide Urban Storm Water Runoff Orange County (Order No. R8-2009-0030, NPDES No. CAS618030, as amended by Order No. R8-2010-0062) (North Orange County MS4 Permit)*. The Final Hydrology Study shall also demonstrate that the on-site drainage facilities and post-construction BMPs are adequately sized to accommodate stormwater runoff from the design storm so that post-development peak flow rates for the 10-year 24-hour frequency storm, 25-year 24-hour frequency storm, and 100-year 24-hour frequency storm does not exceed the pre-development flow rate. The City Director of Public Works, or designee, shall ensure that the drainage facilities specified in the Final Hydrology Study are incorporated into the final project design.	Prior to issuance of grading or building permits	Applicant and City of Cypress Director of Public Works, or designee			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
4.13: Noise					
Regulatory Compliance Measure NOI-1 **Construction Noise and Vibration.** Prior to issuance of grading permits, the City of Cypress (City) Director of Community Development Department, or designee, shall verify that grading and construction plans include the following requirements: • Ensure that the greatest distance between noise sources and sensitive receptors during construction activities has been achieved. • Construction equipment, fixed or mobile, shall be equipped with properly operating and maintained noise mufflers consistent with manufacturers' standards. • Construction staging areas shall be located away from off-site sensitive uses during the later phases of project development. • The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the project site whenever feasible. • The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators where feasible. • A sign, legible at a distance of 50 feet, shall also be posted at the construction site perimeter. All notices and the signs shall indicate the dates and duration of ground improvement activities, as well as provide a telephone number for the "noise disturbance coordinator." • A "noise disturbance coordinator" shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures to reduce noise levels. All signs posted at the construction site shall list the telephone number for the disturbance coordinator.	Prior to issuance of grading permits	Applicant and/or Construction Supervisor/City of Cypress Director of Community Development Department, or designee			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
Mitigation Measure NOI-1 **Construction Vibration Monitoring Plan**. Due to the close proximity to surrounding structures, the City of Cypress (City) Director of Community Development, or designee, shall verify prior to issuance of demolition or grading permits, that the approved plans require that the construction contractor implement the following mitigation measures during project construction activities in the event that the use of heavy equipment is necessary within 25 feet (ft) of surrounding structures or when deep dynamic compaction (DDC) construction activity takes places within 80 ft of surrounding structures: • Notification to nearby businesses detailing the schedule and duration of DDC activities. • Structures that are located within 25 ft of heavy construction activities and within 80 ft of DDC construction activity that have the potential to be affected by ground-borne vibration shall be identified. This task shall be conducted by a qualified structural engineer as approved by the City's Director of Community Development, or designee. • The Applicant's construction contractor shall develop a vibration monitoring and construction contingency plan for approval by the City's Director of Community Development, or designee, to identify appropriate locations in the vicinity of nearby structures where monitoring would be conducted; set up a vibration monitoring schedule; define structure-specific maximum vibration limits based on building inspections; contain provisions to conduct photo, elevation, and crack surveys to document before and after construction conditions at those structures. The plan shall identify construction contingencies that would be implemented if vibration levels approach the established vibration limits at a particular location. Potential contingencies may include one or more of the following:	Prior to issuance of demolition or grading permits	Applicant and/or Construction Supervisor/City of Cypress Director of Community Development Department, or designee			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
○ Lowering the height of the compaction weight; ○ Using a lighter compaction weight; or ○ Any other alternate method that is safe and appropriate, as determined by the project geotechnical consultant, in consultation with the City's Director of Community Development (such as utilizing geopier stabilization instead of DDC). [1] • At a minimum, vibration during initial site preparation activities at the locations described above shall be monitored. The monitoring results may indicate the need for more or less intensive measurements. When vibration levels approach the applicable limits established in the vibration monitoring and construction contingency plan, construction shall be suspended and the appropriate mitigation measures identified in the construction contingency plan shall be implemented to reduce vibration levels below thresholds.					
4.17: Transportation					
Mitigation Measure TRA-1: Truck Access & Routing Plan and Truck Signage and Striping Plan. The Applicant shall submit a Truck Access and Routing Plan to accommodate the circulation of trucks on site. Additionally, the Applicant shall prepare a Signage and Striping Plan, consistent with the provisions of the California Manual on Uniform Traffic Control Devices (CA MUTCD), that directs heavy trucks to the most appropriate access point. The Public Works Director of the City of Cypress, or designee, shall review and approve the Truck Access and Routing Plan and Signage and Striping Plan and confirm they have been incorporated into the project plans prior to the issuance of a building permit.	Prior to issuance of building permits	Applicant and City of Cypress Public Works Director, or designee			

[1] Utilizing a geopier stabilization system method is estimated to result in vibration levels of 0.22 at approximately 15 feet, which would ensure that vibration from construction within 10 feet remains lower than the threshold of 0.5 in/sec PPV for building damage.

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
4.18: Tribal Cultural Resources					
Mitigation Measure TRC-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities. The project Applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation). The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/ definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground- disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project Applicant/lead agency upon written request to the Tribe. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh Nation from a designated point of contact for the project Applicant/lead agency	Prior to ground disturbing activities	Applicant and City of Cypress Engineer, or designee			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh Nation to the project Applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh Nation TCRs. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh Nation monitor and/or Kizh Nation archaeologist. The Kizh Nation will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.					
Mitigation Measure TRC-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects. Native American human remains are defined in Public Resources Code 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section	During construction activities	Applicant and/or Construction Supervisor/City of Cypress Director of Community Development Department, or designee			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
5097.98 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh Nation determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh Nation monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).) Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.					
Mitigation Measure TCR-3 Procedures for Burials and Funerary Remains. As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a	During project construction	Applicant and/or Construction Supervisor/City of Cypress Director of Community Development Department, or designee			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
separate treatment plan shall be created. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. In the event preservation in place is not possible despite good faith efforts by the project Applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe					

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.					

DRAFT

ENVIRONMENTAL IMPACT REPORT

5665 PLAZA DRIVE PROJECT

CYPRESS, CALIFORNIA

August 2024

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LIST OF ACRONYMS AND ABBREVIATIONS

°C	degrees Celsius
°F	degrees Fahrenheit
µg/m^3	micrograms per cubic meter
AAQS	ambient air quality standards
AB	Assembly Bill
ADT	average daily trips
amsl	above mean sea level
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
Basin	South Coast Air Basin
BMPs	Best Management Practices
BTU	British Thermal Units
C_2H_3Cl	vinyl chloride
C_2F_6	hexafluoromethane
CAA	(federal) Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
Cal/OSHA	California Occupational Safety and Health Administration
CalEEMod	California Emissions Estimator Model
CALGreen Code	California Green Building Standards Code
California Register	California Register of Historical Resources
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CA MUTCD	Caltrans 2014 California Manual on Uniform Traffic Control Devices
CARB	California Air Resources Board
CARB Handbook	*Air Quality and Land Use Handbook: A Community Health Perspective*
CAT	Climate Action Team
CBC	California Building Code

CBSC	California Building Standards Commission
CCAA	California Clean Air Act
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CF_4	tetrafluoromethane
CGS	California Geological Survey
CH_4	methane
CHRIS	California Historical Resources Information System
City	City of Cypress
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
COSR	Conservation/Open Space/Recreation
County	County of Orange
CPT	cone penetrometer test
CPUC	California Public Utilities Commission
dB	decibel(s)
dBA	A-weighted decibel(s)
DDC	deep dynamic compaction
du	dwelling unit
EIA	United States Energy Information Administration
EIR	Environmental Impact Report
EMFAC	EMission FACtor Model
EO	Executive Order
EQ Zapp	California Geological Survey's California Earthquake Hazards Zone Application
ESA	Environmental Site Assessment

EV	electric vehicle
FHWA	Federal Highway Administration
ft	foot/feet
FTA	Federal Transit Administration
GCC	global climate change
GHG	greenhouse gas
GWh	gigawatt-hours
GWP	global warming potential
H_2S	hydrogen sulfide
HAPs	Hazardous Air Pollutants
HBW	home-based work
HCM	*Highway Capacity Manual*
HFCs	hydrofluorocarbons
HVAC	heating ventilation and air conditioning
I-5	Interstate 5
I-605	Interstate 605
ICU	Intersection Capacity Utilization
IEPR	Integrated Energy Policy Report
IS	Initial Study
ITE	Institute of Transportation Engineers
JFTB	Joint Forces Training Base
Kizh Nation	Gabrieleño Band of Mission Indians – Kizh Nation
kWh	kilowatt hours
lbs/day	pounds per day
LCFS	Low Carbon Fuel Standard
L_{dn}	day-night average noise level
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent continuous sound level
L_{max}	maximum A-weighted sound level
LOS	level of service
LST	Localized Significance Threshold

LT	long-term measurement
Ma	million years ago
mg/m^3	milligrams per cubic meter
MLD	Most Likely Descendant
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons
MND	Mitigated Negative Declaration
MPAH	(County of Orange) Master Plan of Arterial Highways
mpg	miles per gallon
mph	miles per hour
MPO	Metropolitan Planning Organization
MS4	Municipal Separate Storm Sewer System
MT	metric tons
MT CO_2e	metric tons of carbon dioxide equivalent
MT CO_2e/yr	metric tons of carbon dioxide equivalent per year
MT/yr	metric tons per year
MW	megawatt
N_2O	nitrous oxide
N/A	not applicable
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
National Register	National Register of Historic Places
NAVD88	North American Vertical Datum of 1988
ND	no data
NHPA	National Historic Preservation Act of 1966
NHTSA	National Highway Traffic Safety Administration
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NO_X	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System

NPS	National Park Service
O_3	ozone
OCFA	Orange County Fire Authority
OCTA	Orange County Transportation Authority
OCTAM	Orange County Transportation Analysis Model
OCWD	Orange County Water District
OHP	(California) Office of Historic Preservation
OPR	(California) Governor's Office of Planning and Research
Orange County Basin	Orange County Groundwater Basin
OSHA	Occupational Safety and Health Administration
Pb	lead
PC	Planned Community
PCE	passenger car equivalents
PFCs	perfluorocarbons
PM_{10}	particulate matter less than 10 microns in diameter
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
ppb	parts per billion
ppm	parts per million
PPV	peak particle velocity
PRC	California Public Resources Code
Project Applicant	Goodman
proposed project	5665 Plaza Drive Project
RCP	Regional Comprehensive Plan
ROGs	reactive organic gases
RPS	Renewables Portfolio Standard
RTIP	Regional Transportation Improvement Program
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SAFE	Safer Affordable Fuel Efficient
SB	Senate Bill

SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SCG	Southern California Geotechnical, Inc.
SCH	State Clearing House
SCS	Sustainable Communities Strategy
sf	square foot/feet
SF_6	sulfur hexafluoride
SHMA	Seismic Hazard Mapping Act
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SLF	Sacred Lands File
SO_2	sulfur dioxide
SoCalGas	Southern California Gas
SO_X	sulfur oxides
SPA	Specific Plan Amendment
Specific Plan	McDonnell Center Amended Specific Plan
SPL	sound power levels
SR-22	State Route 22
SR-91	State Route 91
SRA	Source Receptor Area
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TAZ	traffic analysis zone
TCR	tribal cultural resources
TIA	Traffic Impact Analysis
TISG	Transportation Impact Study Guide
TRUs	Transport Refrigeration Units

TRU ACTM	Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units and TRU Generator Sets, and Facilities where TRUs Operate
UNFCCC	United Nations Framework Convention on Climate Change
USC	United States Code
USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
v/c	volume-to-capacity
VdB	vibration velocity decibels
VMT	vehicle miles traveled
VOCs	volatile organic compounds
WDID	Waste Discharge Identification Number
Working Group	GHG CEQA Significance Threshold Working Group
WQMP	Water Quality Management Plan
ZEVs	zero emission vehicles
ZNE	zero net energy

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1.0 EXECUTIVE SUMMARY

1.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that local government agencies, before taking action on projects over which they have discretionary approval authority, consider the environmental consequences of such projects. An Environmental Impact Report (EIR) is a document designed to provide to the public and to local and State governmental agency decision-makers an analysis of potential environmental consequences of a project to support informed decision-making.

This EIR has been prepared by the City of Cypress (City) to evaluate environmental impacts associated with the proposed 5665 Plaza Drive Project (proposed project); to discuss alternatives; and to propose mitigation measures that will minimize, offset, or otherwise reduce or avoid the identified potentially significant environmental impacts.

This EIR has been prepared pursuant to the requirements of CEQA (Public Resources Code (PRC) § 21000 *et seq*.) and the State CEQA Guidelines (California Code of Regulations [Cal. Code Regs.] Tit. 14 § 15000 *et seq*.). For purposes of CEQA, the City is the Lead Agency, and as such, has reviewed all submitted drafts, technical studies, and reports for consistency with applicable City regulations and policies and has commissioned the preparation of this EIR to reflect its own independent judgment.

Data for this EIR were obtained from on-site field observations; discussion with affected agencies; review of adopted plans and policies; review of available studies, reports, and data; and specialized environmental assessments prepared for the project (e.g., air quality, noise, and traffic).

The Executive Summary is intended to highlight the major areas of importance in the environmental analysis for the proposed project as required by State CEQA Guidelines Section 15123. The Executive Summary includes a brief description of the proposed project, areas of controversy known to the City, including issues raised by agencies and the public, a summary of the significant unavoidable impacts of the proposed project, and a summary of alternatives evaluated in the EIR. This Executive Summary also provides a table summarizing (1) the potential environmental impacts that would occur as a result of project implementation and operation; (2) the level of significance prior to implementation of mitigation measures; (3) regulatory compliance measures and mitigation measures that avoid or reduce the significant impacts of the proposed project, and (4) the level of significance after mitigation measures are implemented.

1.2 SUMMARY OF PROJECT DESCRIPTION

The proposed project would be located on an approximately 8.53-acre site (project site) at 5665 Plaza Drive in the City of Cypress, California. In its existing setting, the project site is developed with one five-story office building (150,626 square feet) and associated parking lot with existing light poles, and landscaping. The project site is bounded by industrial and office uses to the north, industrial uses to the west, Plaza Drive to the south, and the Goodman Commerce Center Project to the east. The Goodman Commerce Center Project, approved in April 2023, was under construction at the time of the preparation of this EIR.

The proposed project includes the demolition of an existing 150,626-square-foot five-story office building on the project site and the construction of a new 191,394-square-foot light industrial building with 181,061 square feet of warehouse space and 10,333 square feet of office space. The maximum height of the new light industrial building would be approximately 51 feet, 6 inches to the top of the parapet wall. The proposed project would provide 25 loading docks on the west side of the proposed building. The proposed project would relocate the existing driveway locations. The new westernmost driveway would be the primary truck access point and path to the truck loading docks on the proposed building's west side. Additionally, the proposed project would include a lot line adjustment to move the project site's eastern property line approximately 20 feet east, and amendments to the McDonnell Center 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.

Required discretionary actions associated with the proposed project include the following: certification of the EIR; a Specific Plan Amendment to the McDonnell Center Specific Plan to allow light industrial uses within the eastern portion of Planning Area 1, and removal of the maximum developable area requirement while retaining the 1.0:1 FAR to maintain consistency with the General Plan; and a Site plan approval.

1.3 AREAS OF CONTROVERSY

Pursuant to State CEQA Guidelines Section 15123, this EIR acknowledges the areas of controversy and issues to be resolved that are known to the City or were raised during the scoping process. On May 7, 2024, a Notice of Preparation (NOP) for the EIR was posted to the City's website and distributed by the City via the State Clearinghouse (SCH). The NOP was circulated for review from May 7 to June 5, 2024. The SCH number for this EIR is SCH No. 2020069007. In accordance with State CEQA Guidelines Section 15082, the NOP was circulated to public agencies and interested individuals and was posted at the Orange County Clerk-Recorder's Office for a period of 30 days. During the 30-day public scoping period, written comments were solicited pertaining to environmental issues/topics that this EIR should evaluate. The City held a virtual public scoping meeting on Tuesday, May 28, 2024, to present the proposed project and to solicit input from interested parties. One public comment was received during the Scoping Meeting. The issues and concerns raised in response to the NOP or at the scoping meeting are summarized as follows:

Allyssa J. Holcomb, Garrett Stiepel Ryder, LLP, on behalf of Warland Investments Company

- **Air Quality:** Concern related to excessive air pollution due to the assumption that the proposed project could foreseeably be used as a logistics center. Concern that the proposed project failed to address the impact of refrigerated trucks on air quality and did not evaluate the air quality impact of off-site effects, such as vehicle and truck trips. Concerns regarding the cumulative short and long-term impacts to air quality in surrounding areas due to the proposed project.

- **Greenhouse Gas Emissions:** Concern that proposed project emissions would exceed the South Coast Air Quality Management District (SCAQMD) greenhouse gas (GHG) emissions threshold and concern that the analysis also fails to clearly evaluate the effects of off-site GHG emissions.

- **Land Use:** Suggestion that the City should limit the scope of the EIR to current permitted land uses.

- **Noise:** Concern related to increased noise generation due to the proposed project's foreseeable use as a logistics center.

- **Traffic:** Concern related to increased traffic congestion due to the proposed project's foreseeable use as a logistics center. Concern related to the Truck Distribution Map in the Traffic Analysis for the proposed project. It was stated that the analysis failed to account for truck traffic from the combined 5665 Plaza Drive Project and Goodman Commerce Center Project. It was stated that the proposed project made the incorrect assumption that 100 percent of truck traffic would exit via Driveway 1 and omitted detailed projections for truck routes, especially regarding the impact on nearby residential areas. Concern that the Traffic Analysis inaccurately estimated daily truck trips by solely evaluating the 5665 Plaza Drive project, rather than considering the Goodman Commerce Center as a logistics hub, leading to a significant underestimation of truck traffic impacts.

City of Los Alamitos

- **Air Quality:** Suggestion that the Draft EIR include an evaluation of the proposed project's impact on air quality due to the proposed change in land use.

- **Greenhouse Gas Emissions:** Suggestion that the Draft EIR include an evaluation of the proposed project's impact on GHG emissions due to the proposed change in land use.

- **Noise:** Suggestion that the proposed project include an evaluation of the project's noise impacts due to the change in land use, proximity to sensitive noise receptors, and maximum noise levels provided in applicable General Plans, including the City of Los Alamitos General Plan.

- **Traffic:** Suggestion that the Draft EIR include the existing truck routes, the project's impact to and along the truck routes, and any impacts or needs to modify truck routes. Suggestion that the proposed project should provide a traffic and/or access analyses that evaluates the daily truck trips and their distribution and influence on Los Alamitos roadways.

Native American Heritage Commission (NAHC)

- **Tribal Cultural Resources**: Outlined the City's tribal consultation requirements under Assembly Bill 52 and Senate Bill 18.

1.4 SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the State CEQA Guidelines requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less than significant level.

1.5 ALTERNATIVES

1.5.1 Alternatives Evaluated in this EIR

PRC Section 21100 and State CEQA Guidelines Section 15126 require an EIR to identify and discuss a No Project Alternative and a reasonable range of alternatives to the proposed project that would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant environmental impacts. The following four alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic objectives of the proposed project but that may avoid or substantially lessen any of the significant impacts of the proposed project. Therefore, the alternatives considered in this EIR include the following:

- **Alternative 1 – No Project Alternative:** Consistent with State CEQA Guidelines Section 15126.6, the No Project Alternative assumes the existing land uses and condition of the project site at the time the NOP was published (May 2024) would remain unchanged. The No Project Alternative represents the environmental conditions that would exist if no new development of any kind were to occur on the project site. Under the No Project Alternative, the existing five-story office building on the project site would remain in place. The setting of the project site at the time the NOP was published is described in Chapter 4.0 of this Draft EIR with respect to individual environmental issues and forms the baseline of the impact assessment of the proposed project. While the No Project Alternative would avoid the potential impacts of the proposed project and require no mitigation measures, none of the project objectives would be achieved.

- **Alternative 2 – Reduced Footprint Alternative:** Alternative 2 would occupy the same building footprint as the proposed project and would include the construction and operation of a light-industrial building on the project site; however, Alternative 2 would reduce the project footprint by one-third (33 percent). Under this alternative, it is assumed that the light industrial building would be built out at 127,596 square feet (63,798 square feet smaller than the proposed project) and operate at a reduced capacity as compared to the proposed project. Similar to the proposed project, Alternative 2 would be located on the same approximately 8.53-acre project site, include demolition of the existing 150,626-square-foot five-story office building, and construction of a new light industrial building, with associated landscaping, surface parking, and utility improvements. Alternative 2 would provide the same number of loading docks on the western side of the proposed building (25 docks) and the same number of parking spaces (206 parking stalls) on all sides of the new building. Similar to the proposed project, Alternative 2 would relocate the two existing driveways, providing a new westernmost driveway that would be the primary truck access point and path to the truck loading docks on the proposed building's west side, and a new eastern driveway, which would be a shared driveway with the parcel to the east.

- **Alternative 3 – No Refrigeration Warehouse Alternative:** The No Refrigeration Warehouse Alternative includes the construction and operation of a light-industrial building on the project site similar to the proposed project; however, Alternative 3 would not include any refrigerated space in the light industrial building or the access to the project site by refrigerated trucks. Similar to the proposed project, the Alternative 3 would be located on an approximately 8.53-

acre site and include the demolition of the existing 150,626-square-foot five-story office building on the project site and the construction of a new 191,394-square-foot light industrial building with 181,061 square feet of warehouse space and 10,333 square feet of office space with associated landscaping, surface parking, and utility improvements. Alternative 3 would provide the same number of loading docks on the west side of the proposed building and include the same number of parking spaces on all sides of the new building. Additionally, similar to the proposed project, the No Refrigeration Warehouse Alternative would relocate two existing driveways, providing a new westernmost driveway that would be the primary truck access point and path to the truck loading docks on the proposed building's west side and a new eastern driveway, which would be a shared driveway with the parcel to the east. However, Alternative 3 would see reduced operational emissions of criteria pollutants and greenhouse gases.

- **Alternative 4: Deep Dynamic Compaction (DDC) and Stone Columns:** Alternative 4 would occupy the same building footprint as the proposed project; however, under Alternative 4, both DDC and stone columns would be utilized to reduce the liquefaction potential of project soils. DDC is a ground improvement technique that 10-ton weight that would be dropped at a height of 60 feet. Stone columns involve filling pre-augered cavities with aggregate, the aggregate is then compacted using static ground pressure combined with a high frequency, low amplitude vibratory hammer. Under Alternative 4, stone columns would be placed around the periphery of the project site, while DDC would only be implemented near the central portions of the project site to reduce vibratory impacts to nearby buildings. Like the proposed project, Alternative 4 would be located on an approximately 8.53-acre site and include the demolition of the existing 150,626-square-foot five-story office building on the project site and the construction of a new 191,394-square-foot light industrial building with 181,061 square feet of warehouse space and 10,333 square feet of office space with associated landscaping, surface parking, and utility improvements. Alternative 4 would provide the same number of loading docks on the west side of the proposed building and include the same number of parking spaces on all sides of the new building. Additionally, similar to the proposed project, Alternative 4 would relocate two existing driveways, providing a new westernmost driveway that would be the primary truck access point and path to the truck loading docks on the proposed building's west side and a new eastern driveway, which would be a shared driveway with the parcel to the east.

1.5.2 Identification of the Environmentally Superior Alternative

CEQA requires the identification of an Environmentally Superior Alternative among the project and the alternatives evaluated in an EIR. State CEQA Guidelines Section 15126.6(e)(2) provides that, if the No Project/No Build Alternative is the Environmentally Superior Alternative, then the EIR shall also identify an Environmentally Superior Alternative among the other alternatives and the proposed project. Putting aside the No Project Alternative, Alternative 4 is the Environmentally Superior Alternative because this alternative would reduce impacts to noise and vibration from "Less than Significant with Mitigation Incorporated" to "Less than Significant" and would have the least impact on noise and vibration compared to all other alternatives. Alternative 4 would also meet all of the project objectives of the proposed project. Accordingly, it is determined that Alternative 4 is the Environmentally Superior Alternative because it would meet all of the project's objectives and would result in reduced impacts to noise and vibration as compared to the proposed project.

1.6 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Table 1.1 identifies the potential project environmental impacts, proposed mitigation measures, and level of significance after mitigation is incorporated into the project. Environmental topics addressed in this EIR include Air Quality, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Noise, Transportation and Traffic, and Tribal Cultural Resources.

1.6.1 Secondary Effects of Mitigation Measures

In accordance with State CEQA Guidelines Section 15126.4(a)(1)(D), if any mitigation measure would cause one or more significant effects in addition to those that would be caused by the proposed project, the effects of the mitigation measure shall be discussed. The mitigation measures proposed (as listed on **Table 1.1**) require the Applicant/Developer to provide evidence that the project would adhere to existing programs, regulations, or recommendations in technical reports. The regulations and policies listed in the mitigation measures have been evaluated during their respective adoptions or approval processes. No secondary effects related to the proposed mitigation measures are expected to occur.

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
4.2: Air Quality		
Threshold AIR-1: Would the project conflict with or obstruct implementation of the applicable air quality plan? **Less Than Significant Impact.** The proposed project would not conflict with or obstruct implementation of the 2022 AQMP because the project's construction and operational emissions would not exceed the SCAQMD regional significance thresholds or Localized Significance Thresholds (LSTs), and the proposed project is consistent with the land use and growth intensities reflected in the adopted General Plan. Furthermore, the project would not exceed any applicable regional or local thresholds. Based on the consistency analysis provided in Section 4.1 Air Quality of the Draft EIR, the proposed project would be consistent with the regional AQMP. Therefore, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant, and no mitigation is required.	No mitigation is required.	Less Than Significant Impact.
Threshold AIR-2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard? **Less Than Significant Impact.** **Construction.** Construction emissions associated with the proposed project would not exceed the SCAQMD's thresholds for VOCs, NO_X, CO, SO_X, $PM_{2.5}$, and PM_{10}. Therefore, construction of the proposed project would not result in a cumulatively considerable increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State AAQS. Impacts would be less than significant, and no mitigation is required. **Operation.** Operational emissions associated with the proposed project would not exceed the significance criteria for daily VOCs, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State AAQS. Impacts would be less than significant, and no mitigation is required.	No mitigation is required.	Less Than Significant Impact.
Threshold AIR-3: Would the project expose sensitive receptors to substantial pollutant concentrations? **Less Than Significant Impact.** The proposed project would not result in an exceedance of a SCAQMD LST during project construction or operation. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant. Mitigation is not required.	No mitigation is required.	Less Than Significant Impact.
Threshold AIR-4: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? **Less Than Significant Impact.** **Construction** Heavy-duty equipment on the project site during construction would emit odors, primarily from equipment exhaust. In addition, the application of asphalt and architectural coatings during construction activities may result in odors. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and are thus considered less than significant. **Operation.** The proposed project would construct a light industrial building. Therefore, the proposed project does not contain land uses typically associated with emitting objectionable odors. The proposed project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed operations would be less than significant, and no mitigation is required.	No mitigation is required.	Less Than Significant Impact.
Cumulative Air Quality Impacts. **Less Than Significant Impact.** The cumulative impact area for air quality related to the proposed project is the South Coast Air Basin. Each project in the Basin is required to comply with SCAQMD rules and regulations and is subject to independent review. Per SCAQMD guidance, projects that exceed project-specific significance thresholds are considered to be cumulatively considerable. Conversely, projects that do not exceed project-specific thresholds are generally not considered to be cumulatively significant. The Basin is currently designated as a nonattainment area for the federal O_3 standard and $PM_{2.5}$ standard and as a nonattainment area for the State O_3, PM_{10}, and $PM_{2.5}$ standard. Thus, the Basin has not met the federal and State standards for these air pollutants. Future development that may take place with implementation of the project would contribute criteria pollutants to the area during project construction and operation.	No mitigation is required.	Less Than Significant Impact.

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
Air pollution is inherently a cumulative type of impact measured across an air basin. The discussion under Threshold AQ-2, above, includes an analysis of the proposed project's contribution to cumulative air impacts. As discussed above, construction emissions associated with the proposed project would not exceed the SCAQMD thresholds for VOCs, NOx, CO, SO_X, $PM_{2.5}$, or PM_{10} emissions. The proposed project's construction- and operation-related regional daily emissions are less than the SCAQMD significance thresholds for all criteria pollutants. In addition, adherence to SCAQMD rules and regulations on a project-by-project basis would substantially reduce potential impacts associated with the related projects and basin-wide air pollutant emissions. Therefore, the proposed project would not have a cumulatively considerable increase in emissions and the proposed project's cumulative air quality impacts would be less than significant.		
4.4: Cultural Resources		
Threshold CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? **No Impact.** The SCCIC record search results and field survey identified no previously recorded cultural resources on or in soils on the project site. As such, there are no historical resources as defined in State CEQA Guidelines Section 15064.5 located within the project site. The proposed project would not cause a substantial adverse change in the significance of a historical resource, and no mitigation is required.	No mitigation is required.	No Impact.
Threshold CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? **Less than Significant with Mitigation Incorporated**. According to the City of Cypress General Plan, there are no known archaeological resources located in Cypress. The project site has been previously disturbed to construct an office building and a surface parking lot. The existing office building at the project site would be demolished, materials removed or repurposed, and the entirety of the site would be graded for the construction of the proposed project. During site preparation/grading activities, there is the potential to encounter unknown cultural resources. In the event that historical or archaeological resources are encountered during grading and construction, operations shall cease and **Mitigation Measure CUL-1** would be implemented. With the implementation of **Mitigation Measure CUL-1,** project impacts to archaeological resources would be less than significant with mitigation incorporated.	**Mitigation Measure CUL-1** **Unknown Archaeological Resources.** In the event that archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the Orange County List of Qualified Archaeologists has evaluated the find in accordance with federal, State, and local guidelines to determine whether the find constitutes a "unique archaeological resource," as defined in Section 21083.2(g) of the California Public Resources Code (PRC). The Applicant and its construction contractor shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the project site. Any found deposits shall be treated in accordance with federal, State and local guidelines, including those set forth in PRC Section 21083.2, and shall be assessed, handled, and treated consistent with accepted standards, such as the Secretary of the Interior's standards and guidelines for archaeology and historic preservation. Prior to commencement of grading activities, the Director of the City of Cypress (City) Community Development Department, or designee, shall verify that all project grading and construction plans include specific requirements regarding California PRC (Section 21083.2[g]) and the treatment of archaeological resources as specified above.	Less Than Significant with Mitigation Incorporated.
Threshold CUL-3: Would the project disturb any human remains, including those interred outside of dedicated cemeteries? **Less Than Significant Impact.** Although no human remains are known to be on the project site or are anticipated to be discovered during project construction, due to ground disturbance there is a possibility of inadvertent discovery of human remains. Disturbing human remains could violate the State's Health and Safety Code as well as destroy the resource. **Regulatory Compliance Measure CUL-1** requires compliance with the State's Health and Safety Code for the treatment of human remains. Adherence to regulatory standards included in **Regulatory Compliance Measure CUL-1** would reduce the impact of the proposed project on human remains to less than significant. No mitigation is required.	**Regulatory Compliance Measure CUL-1** **Human Remains.** In the event that human remains are encountered on the project site, work within 50 feet of the discovery shall be redirected and the County Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the City of Cypress shall consult with the MLD	Less Than Significant Impact.

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
	as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Prior to the issuance of grading permits, the Director of the City of Cypress Community Development Department, or designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.	
Cumulative Cultural Resources Impacts. **Less Than Significant with Mitigation Incorporated.** Because impacts to cultural resources are typically site specific, the geographic scope of the proposed project for purposes of the cumulative impacts analysis would be the project site and the immediately surrounding area. The proposed project would have no impacts to historical resources. Therefore, when combined with the potential impacts of the past, present, and reasonably foreseeable projects identified in **Table 4.1, Summary of Cumulative Projects**, in Chapter 4.0 of this EIR, the proposed project would not contribute to cumulative impacts. The cumulative projects all likely involved or would involve some level of ground disturbance with potential for inadvertent discovery of archaeological resources or human remains. As previously discussed, the proposed project would implement **Mitigation Measure CUL-1** in the case of accidental discovery of archaeological resources and **Regulatory Compliance Measure CUL-1** in the event human remains were accidentally discovered. Compliance with these measures would reduce any impacts to these resources associated with the proposed project to less than significant. Similarly, the cumulative projects would be required to comply with applicable laws and regulations pertaining to discovery of these resources. Accordingly, any cumulative impacts would be less than significant.	Refer to **Regulatory Compliance Measure CUL-1** and **Mitigation Measure CUL-1**, provided under **Thresholds CUL-2** and **CUL-3** above.	Less Than Significant with Mitigation Incorporated.
4.5: Energy		
Threshold ENG-1: Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? **Less Than Significant Impact.** **Construction.** Construction activities are not anticipated to result in an inefficient use of energy because gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the proposed project. Energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. Construction activities would comply with all existing regulations, as required through the City's development permitting process, and would not use large amounts of energy or fuel in a wasteful, inefficient, or unnecessary manner. In addition, the proposed project would be required to comply with **Regulatory Compliance Measure EN-1** which would reduce energy usage on the project site during construction through reducing truck idling times. With implementation of **Regulatory Compliance Measure EN-1**, impacts to energy resources during project construction would be less than significant, and no mitigation is required. **Operation.** Energy use consumed by the proposed project would be associated with natural gas use, electricity consumption, and fuel used for vehicle and truck trips associated with the project. The estimated potential net increase in electricity demand associated with the operation of the proposed project is 3,106,447 kWh per year. Total electricity consumption in Orange County in 2022 was 20,243.7 GWh or 20,243,721,856 kWh. Therefore, operation of the proposed project would increase the annual electricity consumption in Orange County by less than 0.1 percent. The estimated potential net increase in natural gas demand associated with the proposed project is 38,407 therms per year. Total natural gas consumption in Orange County in 2022 was 572 million therms (572,454,744 therms). Therefore, operation of the proposed project would negligibly increase the annual natural gas consumption in Orange County by less than 0.1 percent. In addition, the proposed project would result in energy usage associated with gasoline and diesel to fuel project-related trips. The proposed project is estimated to result in the net decrease of approximately 6,498 gallons of gasoline and the net increase of approximately 132,401 of diesel fuel per year from existing conditions. Based on fuel consumption obtained from EMFAC2021, 155.9 million gallons of diesel and 1.2 billion gallons of gasoline are anticipated to be consumed from vehicle trips in Orange County in 2023. Therefore, vehicle and truck trips associated with the proposed project would not increase the annual gasoline fuel use in Orange County and would increase the annual diesel fuel use by approximately 0.1 percent in Orange County. Therefore, operation of the proposed project would represent a very small percentage of the annual gasoline and diesel fuel consumption in Orange County. Vehicles associated with trips to and from the project site would be subject to fuel economy and efficiency standards, which are applicable throughout the State. The proposed project would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy and would incorporate renewable energy or energy efficiency measures into building design, equipment uses, and transportation. Impacts would be less than significant, and no mitigation measures would be necessary.	**Regulatory Compliance Measure EN-1 Limit Idling Time.** The Applicant and construction contractor would be required to comply with applicable idling regulations for on-road vehicles during project construction and operation, which require truck drivers to turn off their engines within five minutes of idling.	Less Than Significant Impact.

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Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
Threshold ENG-2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? **Less Than Significant Impact. E**nergy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the overall use in the County. In addition, energy usage associated with operation of the proposed project would be relatively small in comparison to the overall use in Orange County and the State's available energy sources. Therefore, energy impacts at the regional level would be negligible. Because California's energy conservation planning actions are conducted at a regional level, and because the proposed project's total impact on regional energy supplies would be minor, the proposed project would not conflict with or obstruct California's energy conservation plans as described in the CEC's Integrated Energy Policy Report. Additionally, as demonstrated above, the proposed project would not result in the inefficient, wasteful, and unnecessary consumption of energy. Potential impacts related to conflict with or obstruction of a State or local plan for renewable energy or energy efficiency would be less than significant, and no mitigation is required.	No mitigation is required.	Less Than Significant Impact.
Cumulative Energy Impacts. **Less Than Significant Impact.** The geographic area for cumulative analysis of electricity is that of the SCE service area, while the geographic area for cumulative analysis of natural gas service is that of the SoCalGas service area. Construction and operation of the proposed project would result in an increased demand for electricity and natural gas service. However, this increase would be minimal and would not require SCE to expand or construct infrastructure that could cause substantial environmental impacts. The proposed project would not result in the demand for natural gas during construction; however, operation of the proposed project would increase on-site natural gas demand. As discussed previously, the estimated potential net increase in electricity demand associated with the operation of the proposed project is 3,106,447 kWh per year. Total electricity consumption in Orange County in 2022 was 20,243.7 GWh or 20,243,721,856 kWh and operation of the proposed project would increase the annual electricity consumption in Orange County by less than 0.1 percent. By 2030, consumption in Orange County is anticipated to increase by 12,000 GWh for the low-demand scenario and by 22,000 GWh for the high-demand scenario.[1] While this forecast represents a large increase in electricity consumption, the proposed project's share of cumulative consumption would be negligible. Energy use associated with the proposed project, in combination with energy use from the cumulative projects, would be within SCE's system-wide net annual increase in electricity supplies over the 2018 to 2030 period, and there are sufficient planned electricity supplies in the region for estimated net increases in energy demands. The estimated potential net increase in natural gas demand associated with proposed project operations is 38,407 therms per year. Development of the cumulative projects is not anticipated to require additional natural gas infrastructure or result in a substantial increase in demand. Total natural gas consumption in the SoCalGas service area in 2022 was 5,026 million therms (1,646 million therms for the industrial sector). Total natural gas consumption in Orange County in 2022 was 572 million therms (352 million therms for the residential sector and 221 million therms for the non-residential sector).[2] Per SoCalGas's forecast, total natural gas consumption in the SoCalGas service area is expected to remain steady through 2030 for low- and mid-demand scenarios and to increase by approximately 650 million therms under a high-demand scenario due to intense energy efficiency efforts.[3] Proposed project operations would negligibly increase the annual natural gas consumption in Orange County by less than 0.1 percent. It is anticipated that SoCalGas would be able to meet the natural gas demand of the proposed project and the cumulative projects without the need to develop additional facilities. In addition, both SCE and SoCalGas demand forecasts include the growth contemplated by the proposed project and the cumulative projects within their respective service areas. Increased energy efficiency to comply with building energy efficiency standards would reduce energy consumption on a per-square-foot basis. Furthermore, utility companies are required to increase their renewable energy sources to meet the Renewable Portfolio Standards mandate of 60 percent renewable supplies by 2030. SCE and SoCalGas plan to continue to provide reliable service to their customers and upgrade their distribution systems as necessary to meet future demand. In addition, the proposed project would result in energy usage associated with gasoline and diesel to fuel project-related trips. The proposed project is estimated to result in the net decrease of approximately 6,498 gallons of gasoline and the net increase of approximately 132,401 of diesel fuel per year from existing conditions. Based on fuel consumption obtained from EMFAC2021, 157.1 million gallons of diesel and 1.2 billion gallons of gasoline are anticipated to be consumed from vehicle trips in Orange County in 2024.	Refer to **Regulatory Compliance Measure EN-1** provided under **Threshold ENG-1**above.	Less Than Significant Impact.

1 CEC. 2018. *California Energy Demand, 2018–2030 Revised Forecast*. Publication Number: CEC-200-2018-002-CMF. February. Website: https://efiling.energy.ca.gov/getdocument.aspx?tn=223244 (accessed May 13, 2024).
2 CEC. 2019b. Gas Consumption by County. Website: http://www.ecdms.energy.ca.gov/gasbycounty.aspx (accessed May 13, 2024).
3 CEC. 2018. *California Energy Demand, 2018–2030 Revised Forecast*. Publication Number: CEC-200-2018-002-CMF. February. Website: https://efiling.energy.ca.gov/getdocument.aspx?tn=223244 (accessed May 13, 2024).

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
Therefore, vehicle and truck trips associated with the proposed project would not increase the annual gasoline fuel use in Orange County and would increase the annual diesel fuel use by approximately 0.1 percent in Orange County. Therefore, operation of the proposed project would represent a very small percentage of the annual gasoline and diesel fuel consumption in Orange County. Compliance with **Regulatory Compliance Measure EN-1** would help ensure that the proposed project does not result in an inefficient, wasteful, and unnecessary consumption of energy. Therefore, the proposed project's contribution to impacts related to the inefficient, wasteful, and unnecessary consumption of energy would not be cumulatively considerable, and no mitigation is required.		
4.6: Geology and Soils		
Threshold GEO-1(i): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidences of known fault? (Refer to Division of Mines and Geology Special Publication 42) **No Impact.** According to the Geotechnical Evaluation, active faults do not appear to be present under or in close proximity to the project site. Additionally, according to the California Geological Survey's EQ Zapp: California Earthquake Hazards Zone Application (EQ Zapp web-based application), the Newport-Inglewood and Whittier Fault Zones are the nearest fault zones located approximately 5.1 miles southwest and 11.6 miles northeast of the project site, respectively. Therefore, surface rupture is not anticipated to occur within the project site or surrounding vicinity. No impact would occur, and no mitigation is required.	No mitigation is required	No Impact.
Threshold GEO-1 (ii): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking? **Less Than Significant with Mitigation Incorporated.** The Geotechnical Evaluation determined no evidence of active faults to be present under or in close proximity to the project site. However, incidental ground cracking and other ground shaking phenomena can occur due to high seismic accelerations and regional seismic activity. Thus, it was determined in the Geotechnical Evaluation that risks associated with seismic shaking and strong ground motion are considered to be moderate. As specified in **Regulatory Compliance Measure GEO-1**, below, the proposed project's building would be subject to the seismic design criteria of the most current CBC requirements that aim to prevent building collapse and reduce the impacts of seismic ground shaking. Adherence to these requirements would address injury and loss of life and building damage after an earthquake. Therefore, with the implementation of **Regulatory Compliance Measure GEO-1**, impacts related to seismic ground shaking would be less than significant, and no mitigation is required.	**Regulatory Compliance Measure GEO-1** **Compliance with Seismic and Building Standards in the Building Code**. Prior to issuance of the first building permit for the proposed buildings, the City of Cypress (City) Engineer, Building Official, or their designee, and the project soils engineer shall review the building plans to verify that the structural design conforms to the requirements of the City's latest adopted edition of the California Building Standards Code. Structures and walls shall be designed in accordance with applicable sections of the City's Building Code.	Less Than Significant Impact.
Threshold GEO-1 (iii): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction? **Less Than Significant with Mitigation Incorporated.** According to the California Geological Survey's EQ Zapp, the project site is located in a Liquefaction Hazards Zone of required investigations. The Geotechnical Evaluation included a subsurface exploration and has determined the presence of potentially liquefiable soils to depths of 50 feet. Further analysis determined potential dynamic settlements of approximately 2.9 inches to 5.27 inches during a strong seismic event. Given the nature of the proposed project, which includes a light industrial facility with office and warehouse uses, differential settlements under current conditions could be significant. Thus, remedial grading, foundation considerations, and/or in-situ ground improvement measures are recommended in the Geotechnical Evaluation to help mitigate potential adverse effects due to soil liquefaction. Implementation of **Mitigation Measure GEO-1**, which requires the construction contractor to comply with the recommendations in the Geotechnical Evaluation to reduce the proposed project's impact related to liquefaction would be required. Therefore, with implementation of **Mitigation Measure GEO-1**, the proposed project's impacts related to liquefaction would be reduced to less than significant. The project would also be required to adhere to **Regulatory Compliance Measure GEO-1.**	**Mitigation Measure GEO-1** **Implementation of Geotechnical Evaluation Recommendations.** The Applicant's construction contractor shall implement the recommendations of the Geotechnical Evaluation prepared for the proposed project, as applicable, to the satisfaction of the City of Cypress' (City) Building Official, or designee. The City's Building Official, or designee, shall confirm recommendations have been implemented into the design and construction of the proposed project prior to the issuance of a building permit. **Regulatory Compliance Measure GEO-1 is** provided above.	Less Than Significant Impact with Mitigation Incorporated
Threshold GEO-1(iv): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides? No Impact. According to the City's General Plan Safety Element (2001), no significant topographic features exist within the City. Further, according to the Geotechnical Evaluation, the topography of the site is relatively flat to very gently sloping. Evidence of ancient landslides or slope instabilities were not observed at the project site. Both the project site and surrounding properties are flat with no unusual geographic features, and therefore, neither the project site nor the surrounding area has the potential for impacts related to landslides. No mitigation is required.	No mitigation is required.	No Impact.

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Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
Threshold GEO-2: Would the project result in substantial soil erosion or the loss of topsoil? **Less Than Significant Impact.** **Construction.** During project construction activities, soil would be exposed and disturbed, drainage patterns would be temporarily altered during grading and other construction activities, and there would be an increased potential for soil erosion and siltation compared to existing conditions. the Construction General Permit requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) (**Regulatory Compliance Measure HYD-1** in **Appendix B** of the Initial Study and the MMRP). The SWPPP would detail Erosion Control and Sediment Control Best Management Practices (BMPs) to be implemented during project construction to minimize erosion and retain sediment on site. With compliance with the requirements of the Construction General Permit and with implementation of the construction BMPs, construction impacts related to substantial soil erosion and loss of topsoil would be less than significant. **Operation:** Operation of the proposed project would not result in substantial soil erosion or loss of topsoil. Potential soil erosion impacts related to construction activities would be less than significant with adherence to the required regulations discussed above. Operation of the proposed project would result in no impacts related to soil erosion or loss of topsoil. No mitigation is required.	Refer to **Regulatory Compliance Measure HYD-1**, which is provided in **Appendix B** of the Initial Study and in the MMRP to the Draft EIR.	Less Than Significant Impact.
Threshold GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-site or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse? **Landslides and Unstable Slopes.** **Less Than Significant Impact.** Because the project site is in a flat area, landslides or other forms of natural slope instability do not represent a significant hazard to the project site or the surrounding area. The site is not within an area susceptible to landslides as both the project site and surrounding properties are flat with no unusual geographic features. Therefore, potential impacts related to landslides would be less than significant, and no mitigation is required. **Lateral Spreading.** **Less Than Significant Impact.** The Geotechnical Evaluation indicates that heavy lateral spreading is considered a low risk while ground cracking displacements, and localized spread is considered a moderate risk. These risks would be reduced by the implementation of **Regulatory Compliance Measure GEO-1**, which would include ground treatment and dewatering, as well as providing a capping of engineered fill. Therefore, potential impacts related to lateral spreading would be less than significant, and no mitigation is required. **Landslides and Unstable Slopes** **Less Than Significant Impact.** Because the project site is in a flat area, landslides or other forms of natural slope instability do not represent a significant hazard to the project site or the surrounding area. In addition, as discussed under Threshold GEO-1(iv), the site is not within an area susceptible to landslides as both the project site and surrounding properties are flat with no unusual geographic features. Therefore, potential impacts related to landslides would be less than significant, and no mitigation is required. **Lateral Spreading** **Less Than Significant Impact**. The Geotechnical Evaluation indicates that heavy lateral spreading is considered a low risk while ground cracking displacements, and localized spread is considered a moderate risk. These risks would be reduced by the implementation of **Regulatory Compliance Measure GEO-1**, which would include ground treatment and dewatering, as well as providing a capping of engineered fill. Therefore, potential impacts related to lateral spreading would be less than significant, and no mitigation is required. **Subsidence** **Less Than Significant Impact.** As specified in **Regulatory Compliance Measure GEO-1**, the proposed project's buildings would be subject to the seismic design criteria of the most current CBC requirements that aim to prevent building collapse and reduce the impacts of seismic ground shaking. Adherence to these requirements would address injury and loss of life and building damage during and after an earthquake. The proposed project's compliance with the most current CBC requirements would also reduce the project's impacts related to subsidence. Adherence to these requirements would address the removal and replacement of site soils. Therefore, with the implementation of **Regulatory Compliance Measure GEO-1**, impacts related to seismic ground shaking would be less than significant, and no mitigation is required. **Liquefaction and Compressible/Collapsible Soils** **Less Than Significant Impact.** As discussed under Threshold GEO-1(iii) above, implementation of **Mitigation Measure GEO-1** and adherence to the regulatory standards described in **Regulatory Compliance Measure GEO-1** would be required to address the proposed project's impacts with respect to liquefaction. Provided that design and remedial grading and ground improvement (as necessary) are	Refer to **Mitigation Measure GEO-1** and **Regulatory Compliance Measure GEO-1,** which are provided under **Threshold GEO-1** above.	Less Than Significant Impact.

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performed in accordance with the applicable requirements in the CBC, and current standards of practice in the area, excessive settlement resulting from liquefaction and compression of existing undocumented fill and some layers of loose sands and silty sands on the project site would be reduced to a less than significant level.		
Threshold GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating direct or indirect substantial risks to life or property? **Less Than Significant Impact**. According to the Geotechnical Evaluation prepared for the proposed project, surface site soils had a "very low" potential for expansion. No recommendations are provided in the Geotechnical Evaluation related to expansive soils due to this very low potential. Therefore, impacts related to expansive soils for the proposed project would be less than significant. No mitigation is required.	No mitigation is required.	Less Than Significant Impact.
Threshold GEO-5: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? **No Impact.** The proposed project would not include the use of septic tanks or alternative wastewater disposal systems because sanitary sewer and wastewater facilities are available in the vicinity of the project site. Therefore, the project would have no impact with respect to septic tanks or alternative wastewater disposal systems.	No mitigation is required.	No Impact.
Threshold GEO-6: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? **Less Than Significant with Mitigation Incorporated.** The project site contains Artificial Fill, which has no paleontological sensitivity, and Young Alluvium, Unit 2, which has low paleontological sensitivity from the surface to a depth of 10 feet and high paleontological sensitivity below 10 feet. With a maximum excavation depth of 8 feet during construction, the proposed project is expected to remain in deposits with no or low paleontological sensitivity. However, in the event that paleontological resources are encountered during construction, **Mitigation Measure GEO-2**, detailed below, would require work in the immediate area of the discovery to be halted and a qualified paleontologist to assess the discovery. These procedures would reduce potential impacts to scientifically significant nonrenewable paleontological resources encountered during construction.	**Mitigation Measure GEO-2** **Procedures for Unexpected Paleontological Resources Discoveries.** In the event that paleontological resources are encountered, work in the immediate area of the discovery shall be halted and the Applicant shall retain a professional paleontologist who meets the qualifications established by the Society of Vertebrate Paleontology to assess the discovery. The qualified, professional paleontologist shall make recommendations regarding the treatment and disposition of the discovered resources, as well as the need for subsequent paleontological mitigation, which may include, but not be limited to, paleontological monitoring, collection of observed resources, preservation, stabilization and identification of collected resources, curation of resources into a museum repository, and preparation of a monitoring report of findings, consistent with well accepted standards, such as those established by the Society of Vertebrate Paleontology. The City of Cypress shall ensure that the recommendations from the qualified, professional paleontologist shall be followed by the Applicant.	Less Than Significant with Mitigation Incorporated.
Cumulative Geology and Soils Impacts. **Less Than Significant Impact.** Typically, geology and soils impacts are specific to a particular project site and there is little, if any, cumulative relationship between the development of a proposed project and development within a larger cumulative area. Moreover, while seismic conditions are regional in nature, seismic impacts on a given project site are site-specific. While seismic events may affect a broad region, development of the cumulative projects would not increase the intensity, frequency, or duration of seismic events or the properties of off-site geology or soils. The CBC (adopted by reference in Chapter 15.08 [Construction Codes] of the City's Municipal Code) contains provisions to safeguard against major structural failures or loss of life caused by earthquakes, liquefaction, ground shaking, landslides, and other seismically induced hazards, as codified in **Regulatory Compliance Measure GEO-1**. In addition, the Geotechnical Evaluation recommendations would reduce potential impacts related to seismic ground shaking, liquefaction, compressible/collapsible soils as required by **Mitigation Measure GEO-1.** Cumulative development projects would be required to undergo environmental review pursuant to CEQA including, as necessary, site-specific investigation of potential geologic, seismic, or soil-related impacts. It is reasonable to expect that such site-specific investigation would appropriately identify the siting, design, and construction criteria established in the CBC and/or by the City to address site-specific geologic/soil conditions affecting future development, and that the City would condition future development to fully satisfy said criteria. Therefore, cumulative geologic, seismic, or soil-related impacts would be rendered to a less than significant level, and the project's contribution to such impacts would not be cumulatively considerable. Potential impacts of the proposed project to unknown paleontological resources and unique geologic features, when combined with the impacts of past, present, and reasonably foreseeable probable future projects in the City of Cypress, could contribute to a cumulatively significant impact due to the overall loss of paleontological remains unique to the region. However, each development proposal received by the City is required to undergo environmental review pursuant to CEQA. If there were any potential for significant impacts to paleontological resources or unique geologic features, an investigation would be required to determine the nature and extent of the	Refer to **Mitigation Measure GEO-1** and **Mitigation Measure GEO-2** and **Regulatory Compliance Measure GEO-1,** which are provided under **Threshold GEO-1 and GEO-6** above.	Less Than Significant Impact.

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
resources and identify appropriate mitigation measures. When resources are assessed and/or protected as they are discovered, impacts to these resources are less than significant. As such, implementation of **Mitigation Measure GEO-2** would ensure that the proposed project, together with cumulative projects, would not result in significant cumulative impacts to unique paleontological resources or unique geologic features.		
4.7: Greenhouse Gas Emissions		
Threshold GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? **Less Than Significant Impact.** **Construction.** Demolition and construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change. It is estimated that the proposed project would generate a total of approximately 536.4 MT CO_2e during construction of the project. When annualized over the 30-year life of the project, annual emissions would be 17.9 MT CO_2e. **Operation.** Long-term operation of the proposed project would generate GHG emissions from area, mobile, stationary, waste, and water sources as well as indirect emissions from sources associated with energy consumption. The proposed project would generate a total of 406 average daily trips (ADT), including 262 passenger vehicle trips, 50 two-axle truck trips, 16 three-axle truck trips, and 78 four-axle truck trips, which were included in CalEEMod. Existing uses would generate a total of 408 ADT. Mobile sources would be the largest source of GHG emissions for the proposed project at approximately 61 percent of the total project emissions. Energy sources would be the next largest category at approximately 33 percent. Water sources would be approximately 4 percent of the total emissions and waste sources would be approximately 2 percent of the total emissions. Area sources would be approximately less than 1 percent of the total emissions. Based on the analysis results, the proposed project would result in a net increase of 2,925.9 MT CO_2e/yr over existing conditions, which would be below the numeric threshold of 3,000 MT CO_2e. Therefore, operation of the proposed project would not generate significant GHG emissions that would have a significant effect on the environment. As such, impacts related to operational GHG emissions would be less than significant. No mitigation is required.	No mitigation is required.	Less Than Significant Impact.
Threshold GHG-2: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? **Less Than Significant Impact.** Applicable plans adopted for the purpose of reducing GHG emissions include CARB's 2022 Scoping Plan Update and SCAG's 2024–2050 RTP/SCS. The proposed project would not conflict with the stated goals of the RTP/SCS; therefore, the proposed project would not interfere with SCAG's ability to achieve the region's GHG reduction targets of 19 percent below 2005 per capita emissions levels by 2035, and it can be assumed that regional mobile emissions would decrease in line with the goals of the RTP/SCS. The proposed project would consist of a 191,394-square-foot light industrial building. Based on the nature of the proposed project, it is anticipated that implementation of the proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS. Therefore, the proposed project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Impacts would be less than significant, and no mitigation is required.	No mitigation is required.	Less Than Significant Impact.
Cumulative Greenhouse Gas Impacts. **Less Than Significant Impact.** Cumulative impacts are the collective impacts of one or more past, present, or reasonably foreseeable probable future projects, that when combined, result in adverse changes to the environment. Climate change is a global environmental problem in which: (1) any given development project contributes only a small portion of any net increase in GHGs, and (2) global growth is continuing to contribute large amounts of GHGs across the world. Land use projects may contribute to the phenomenon of global climate change in ways that would be experienced worldwide, and with some specific effects felt in California. However, no scientific study has established a direct causal link between individual land use project impacts and global warming. **Table 4.1: Summary of Cumulative Projects** identifies the past, present, and reasonably foreseeable probable future projects that when considered with the proposed project could result in cumulative impacts. The analysis of impacts related to GHG emissions is inherently cumulative. Potential	No mitigation is required.	Less Than Significant Impact.

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
cumulative impacts would occur if the proposed project, when considered with the cumulative projects would result in significant impacts to GHGs. While the proposed project would generate GHGs as part of project construction and operations, these emissions would not exceed applicable thresholds. In addition, the proposed project would not conflict with applicable statewide and regional climate action plans and policies. Therefore, the proposed project's GHG emissions would not be cumulatively considerable and cumulative impacts associated with the proposed project would be less than significant.		
4.11: Noise		
Threshold NOI-1: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? **Less Than Significant Impact.** **Construction.** Short-term noise impacts would be associated with demolition of the existing office building, excavation, grading, and construction of the proposed structure. Construction-related short-term noise levels would be higher than existing ambient noise levels in the vicinity of the project site at the present time but would no longer occur once construction of the proposed project is completed. The combination of the equipment during the site preparation and grading phases, considering the usage factor of each piece of equipment, would result in a combined noise level of 59 dBA L_{eq} at a distance of 1,300 feet, which represents the distance from the center of construction activity at the project site to the nearest noise-sensitive hotel use (Courtyard by Marriott) to the southeast. While construction-related short-term noise levels have the potential to be higher than existing ambient noise levels in the vicinity of the project site under existing conditions, the noise impacts would no longer occur once project construction is completed. During deep dynamic compaction activities, the major source of noise would be the crane utilized to drop the weight. Construction noise levels would be similar to those during building construction as that construction phase would also include the operation of a crane. Although construction noise would be higher than the ambient noise in the vicinity of the project site, it would cease to occur once project construction is completed. Additionally, with the incorporation of **Regulatory Compliance Measure NOI-1**, all feasible and reasonable measures to reduce construction noise would be implemented, and a less than significant impact would occur. **Operation.** The increase in noise associated with project-related traffic would be very small, ranging from 0.0 to 1.7 dBA along the analyzed road segments. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment; These noise level increases are not perceptible by the human ear; therefore, off-site traffic noise impacts would be less than significant. No mitigation is required. Implementation of the proposed project would generate various on-site stationary noise sources, including heating, ventilation, and air conditioning (HVAC) and dock operations. The project would have various rooftop mechanical equipment, including HVAC units, on the proposed building. To be conservative, it is assumed the project could have four (4) rooftop HVAC units that would operate 24 hours per day and would generate sound power levels (SPL) of up to 76 dBA SPL or 63 dBA L_{eq} at 5 feet. Noise levels generated by delivery trucks would be similar to noise readings from truck loading and unloading activities, which generate a noise level of 75 dBA L_{eq} at 20 feet. To present a conservative assessment, it is assumed that unloading activities could occur at half of the 25 docks simultaneously for a period of more than 30 minutes in a given hour. Additionally, at the remaining half of the loading docks, it is conservatively assumed that refrigeration units attached to the trailers would be in operation while waiting to be unloaded. Based on reference measurements, each unit would have a reference noise level of 79.4 dBA at 15 feet. The proposed project would not substantially increase noise levels over existing conditions. Additionally, the proposed project will generate daytime and nighttime operational noise level increases ranging from 60 to 55 dBA L_{eq}. The estimated noise level at the closest noise-sensitive uses would be less than 34 dBA L_{eq}. Additionally, the proposed project would not substantially increase noise levels over existing conditions. Therefore, this impact would be less than significant. No mitigation is required.	**Standard Condition NOI-1** **Construction Noise and Vibration.** Prior to issuance of grading permits, the City of Cypress (City) Director of Community Development Department, or designee, shall verify that grading and construction plans include the following requirements: • Ensure that the greatest distance between noise sources and sensitive receptors during construction activities has been achieved. • Construction equipment, fixed or mobile, shall be equipped with properly operating and maintained noise mufflers consistent with manufacturers' standards • Construction staging areas shall be located away from off-site sensitive uses during the later phases of project development. • The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from noise-sensitive receptors nearest the project site whenever feasible. • The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators where feasible. • A sign, legible at a distance of 50 feet, shall also be posted at the construction site. as well as provide a telephone number for the "noise disturbance coordinator." • A "noise disturbance coordinator" shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures to reduce noise levels. All perimeter signs posted at the construction site perimeter shall list the telephone number for the disturbance coordinator.	Less Than Significant Impact.
Threshold NOI-2: Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels? **Less Than Significant with Mitigation Incorporated.** **Construction.** Construction of the proposed project could result in the generation of ground-borne vibration. For typical construction activity, the equipment with the highest vibration generation potential is the large bulldozer, which would generate 0.089 PPV in/sec at 25 feet. The closest surrounding buildings to the project site include existing industrial buildings located approximately 5 feet north of the edge of the project site. The industrial building would experience vibration levels of up to 0.995 in/sec PPV. This vibration level at the nearest building from construction equipment would potentially exceed the FTA threshold of 0.5 in/sec PPV for building damage. At a distance of approximately 8 feet from typical construction activities, vibration levels would approach 0.492 in/sec PPV and would be below the FTA	**Mitigation Measure NOI-1** **Less Than Significant with Mitigation Incorporated.** **Construction Vibration Monitoring Plan.** Due to the close proximity to surrounding structures, the City of Cypress (City) Director of Community Development, or designee, shall verify prior to issuance of demolition or grading permits, that the approved plans require that the construction contractor implement the following mitigation measures during project construction activities in the event that the use of heavy equipment is necessary within 25 feet (ft) of surrounding structures or when deep dynamic	Less Than Significant Impact.

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
criteria of 0.5 in/sec PPV. While construction could result in vibration damage, impacts would be reduced to less than significant, and the potential for building damage would be eliminated with the incorporation of **Mitigation Measure NOI-1** as detailed below. For DDC construction activities, the proposed drops could occur as close as 50 feet from the nearest structures. The nearest off-site industrial building to the DDC construction activities would experience vibration levels of up to 1.02 in/sec PPV, which would potentially exceed the FTA threshold of 0.5 in/sec PPV for building damage. At a distance of approximately 78 feet from DDC construction activities, vibration levels would be 0.49 in/sec PPV and would be below the FTA criteria of 0.5 in/sec PPV. While construction could result in vibration damage, impacts would be reduced to less than significant, and the potential for building damage would be eliminated with the incorporation of **Mitigation Measure NOI-1** as detailed below.	compaction (DDC) construction activity takes places within 80 ft of surrounding structures: • Notification to nearby businesses detailing the schedule and duration of DDC activities • Structures that are located within 25 ft of heavy construction activities and within 80 ft of DDC construction activity that have the potential to be affected by ground-borne vibration shall be identified. This task shall be conducted by a qualified structural engineer as approved by the City's Director of Community Development, or designee. • The Applicant's construction contractor shall develop a vibration monitoring and construction contingency plan for approval by the City's Director of Community Development, or designee, to identify appropriate locations in the vicinity of nearby structures where monitoring would be conducted; set up a vibration monitoring schedule; define structure-specific maximum vibration limits based on building inspections; contain provisions to conduct photo, elevation, and crack surveys to document before and after construction conditions at those structures. The plan shall identify construction contingencies that would be implemented if vibration levels approach the established vibration limits at a particular location. Potential contingencies may include one or more of the following: o Lowering the height of the compaction weight; o Using a lighter compaction weight; or o Any other alternate method that is safe and appropriate, as determined by the project geotechnical consultant, in consultation with the City's Director of Community Development (such as utilizing geopier stabilization instead of DDC). [4] • At a minimum, vibration during initial site preparation activities at the locations described above shall be monitored. The monitoring results may indicate the need for more or less intensive measurements. • When vibration levels approach the applicable limits established in the vibration monitoring and construction contingency plan, construction shall be suspended and the appropriate mitigation measures identified in the construction contingency plan shall be implemented to reduce vibration levels below thresholds.	
Threshold NOI-3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? **Less Than Significant Impact.** The closest airport to the project site is Joint Forces Training Base (JFTB) Los Alamitos, which is located approximately 0.4 mile to the southwest. The noise contour boundaries of JFTB show that the project site is located outside of Noise Impact Zone 2 (60 dB CNEL or greater), therefore, this impact would be less than significant. No mitigation is required.	No mitigation is required.	Less Than Significant Impact.

[4] Utilizing a geopier stabilization system method is estimated to result in vibration levels of 0.22 at approximately 15 feet, which would ensure that vibration from construction within 10 feet remains lower than the threshold of 0.5 in/sec PPV for building damage.

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
Cumulative Noise Impacts. **Less Than Significant Impact.** As defined in the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and reasonably foreseeable probable future projects. A cumulative noise or vibration impact would occur if multiple sources of noise and vibration combine to create impacts in close proximity to a sensitive receptor. Therefore, the cumulative area for noise and vibration impacts is the project site and any sensitive receptors in the immediately surrounding area. ***Construction Noise.*** Construction activities associated with the proposed project and other construction projects in the area may overlap, resulting in construction noise in the area. However, construction noise impacts primarily affect the areas immediately adjacent to each construction site. Construction noise for the proposed project was determined to be less than significant. Cumulative development in the vicinity of the project site could result in elevated construction noise levels at sensitive receptors in the area surrounding the project site. However, each project would be required to comply with the applicable City's Municipal Code limitations on construction. Therefore, cumulative construction noise impacts would be less than significant. ***Operational Traffic Source Noise Impacts.*** According to the USEPA, cumulative noise impacts represent the combined and incremental effects of human activities that accumulate over time. While the incremental impacts may be insignificant by themselves, the combined effect may result in a significant impact. Conversely, although there may be a significant noise increase due to the proposed project in combination with other related projects (combined effects), it must also be demonstrated that the project has an incremental effect. In other words, a significant portion of the noise increase must be due to the proposed project. As stated in Section 4.7, Transportation, the results of the Future Year (2025) Condition (Opening Year With Project) peak-hour level of service (LOS) analysis for the study area intersections show that all study area intersections are forecasted to operate at satisfactory LOS during both peak hours. Project-related traffic for the Opening Year With Project would result in noise level increases between 0.0 to 0.8 dBA CNEL along roadway segments in the vicinity of the project site. These levels are below the significance criteria for off-site traffic noise. Therefore, none of the roadway segments in the vicinity of the project site would experience a substantial noise level increase greater than the applicable noise thresholds, and the proposed project would not have a cumulatively significant traffic noise impact. ***Operational Stationary Source Noise.*** Long-term stationary noise sources associated with the development at the proposed project, combined with other cumulative projects, could cause local noise level increases. Noise levels associated with the proposed project and related projects together could result in higher noise levels than considered separately. As previously described, on-site noise sources associated with the proposed project would not exceed any applicable noise standards. Additionally, each of the related projects would be required to comply with the City's noise level standards and include mitigation measures if standards are exceeded. Therefore, cumulative noise impacts from stationary noise sources would be less than significant.	No mitigation is required.	Less Than Significant Impact.
4.13: Transportation		
Threshold TRA-1: Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? **Less Than Significant Impact.** The proposed project is anticipated to generate a net increase of 196 two-way trips per day with a net reduction of 28 a.m. peak hour trips and a net reduction of 22 p.m. peak hour trips (in passenger car equivalents [PCE]). Since the proposed project is likely to generate fewer than 50 net new peak-hour trips and fewer than 25 net new peak-hour trips at any single intersection, the implementation of the proposed project is not anticipated to result in any operational or LOS deficiencies; therefore, no further study is necessary. The City's General Plan provides goals and policies to implement a balanced, functional, and efficient circulation system, and incorporate alternative modes of travel which allows for the safe movement of people and goods. General Plan policies CIR-2.5 and CIR-2.8 encourage the development of adequate sidewalks, particularly to provide connections to surrounding alternative modes of transportation. The project site currently provides sidewalks along Plaza Drive and Walker Drive allowing for pedestrian connections to nearby transit. Therefore, the proposed project would not inhibit the use of alternative transportation in the area and would not conflict with circulation policies in the General Plan. Impacts would be less than significant, and no mitigation is required.	No mitigation is required.	Less Than Significant Impact.
Threshold TRA-2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? **Less Than Significant Impact.** The OPR Technical Advisory recommends that a project generating 110 average daily trips (ADT) or less be screened out of a VMT analysis due to the presumption of a less than significant impact. This recommendation is not based on any analysis of GHG reduction but is instead based on the potential trip generation of a project that would be categorically exempt under	No mitigation is required.	Less Than Significant Impact.

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
CEQA. The proposed project includes the demolition of 150,626 square feet of office space and the construction of a new light industrial building that would be approximately 191,394 square feet in size. The proposed project does not qualify for any of the screening criteria, including the screening threshold for small projects because the proposed project would generate a net increase of 196 ADT and a total of 604 ADT. Therefore, a detailed VMT analysis was prepared. Additionally, the proposed project would constitute a significant impact if the project VMT metric is greater than 85 percent of the regional existing VMT metric. Hence the proposed project would constitute a significant impact if the project VMT per employee is greater than 85 percent of the Orange County VMT per employee (threshold). The project's VMT per employee would be lower than the Orange County regional threshold; therefore, the proposed project would have a less than significant impact related to VMT, and no mitigation measures are required.		
Threshold TRA-3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? **Less Than Significant Impact with Mitigation Incorporated.** Vehicular traffic to and from the project site would utilize the existing network of regional and local roadways that serve the project area. Access to the project site would be provided via two driveways at Plaza Drive and Douglas Drive. The proposed project would include the relocation of the existing driveways. The new westernmost driveway would be the primary truck access point and path to the truck loading docks on the proposed building's west side. The eastern driveway would be a shared driveway with the parcel to the east. It is anticipated that Driveway 1 (on Douglas Drive) and Driveway 2 (on Plaza Drive) would be utilized by heavy trucks to access the project site. Driveway 1 is anticipated to be able to accommodate the ingress and egress of heavy trucks as currently designed, providing access to and from the east on Plaza Drive and south on Douglas Drive. Driveway 1 would serve as the primary driveway for heavy trucks accessing the project site. While Driveway 2 would accommodate the ingress and egress of heavy trucks along Plaza Drive, it is recommended that the northwest curb of Driveway 2 be modified to accommodate a 25-foot curb radius for the egress of heavy trucks. Implementation of **Mitigation Measure TRA-1**, described below, would require the installation of on-site traffic signing and striping to direct heavy trucks to the driveway on Douglas Drive. With implementation of **Mitigation Measure TRA-1**, the proposed project would have a less than significant impact related to transportation hazards.	**Mitigation Measure TRA-1** **Truck Access & Routing Plan and Truck Signage and Striping Plan.** The Applicant shall submit a Truck Access and Routing Plan to accommodate the circulation of trucks on site. Additionally, the Applicant shall prepare a Signage and Striping Plan, consistent with the provisions of the California Manual on Uniform Traffic Control Devices (CA MUTCD), that directs heavy trucks to the most appropriate access point. The Public Works Director of the City of Cypress, or designee, shall review and approve the Truck Access and Routing Plan and Signage and Striping Plan and confirm they have been incorporated into the project plans prior to the issuance of a building permit.	Less Than Significant Impact.
Threshold 4.13.4: Would the project result in inadequate emergency access? **Less Than Significant Impact.** Vehicular access to the project site would be provided via two driveways at Plaza Drive and Douglas Drive. Plaza Drive would allow for adequate emergency access and all project improvements, including driveways, would be designed consistent with applicable emergency access standards. All emergency access routes to the proposed project and adjacent areas would be kept cleared and unobstructed during demolition and construction of the proposed project. No roadway closures or lane closures are anticipated as part of project construction. Therefore, the proposed project's effects on emergency access would be less than significant, and no mitigation is required.	No mitigation is required.	Less Than Significant Impact.
Cumulative Transportation Impacts **Less Than Significant Impact.** As defined in the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects. Potential cumulative impacts would occur if the proposed project in combination with one or more of the cumulative projects would produce significant impacts to transportation. For purposes of analyzing potential cumulative transportation impacts, the cumulative impact study area is the traffic study area outlined in the TIA. The cumulative projects that were determined to potentially affect one or more of the four study area intersections include: • Cypress Town Center (Multifamily Housing) • The Square (Shopping Center / Multifamily Housing / Hotel / Medical Office Building) • Goodman Commerce Center (High-Cube Warehousing) • 5995 Plaza Drive (General Office) The Future Year 2025 Condition includes the existing baseline traffic conditions, without project traffic conditions, and with project traffic conditions within the study area. Any additional traffic generated by other projects not on the cumulative projects list is likely accounted for through background ambient growth factors that have been applied to the peak hour volumes at study area intersections.	No mitigation is required.	Less Than Significant Impact.

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
The City of Cypress General Plan Circulation Element identifies LOS D or better as the desired citywide operating standard for most City streets. Traffic associated with the proposed project when combined with the cumulative projects would not exceed LOS D. Accordingly, the proposed project in combination with the cumulative projects would not conflict with circulation policies in the General Plan. Furthermore, like the proposed project, the cumulative projects would be required to comply with applicable programs, plans, ordinances, and policies addressing the circulation system. Accordingly, the proposed project in combination with the cumulative projects would not result in significant cumulative impacts associated with conflicts with these programs, plans, and policies. The proposed project's VMT per employee would be lower than the Orange County regional threshold; therefore, the proposed project would have a less than significant impact related to VMT. Like the proposed project, the cumulative projects would be required to evaluate VMT as part of the environmental review process for those projects. In the event significant VMT impacts were identified, the project would be required to adopt appropriate mitigation to reduce impacts to a less than significant level. Accordingly, the proposed project in combination with the cumulative projects would not result in significant cumulative impacts associated with VMT. The proposed project would result in a less than significant impact with mitigation incorporated in relationship to design hazards. This mitigation would include a truck access and routing plan and truck signage and striping to help accommodate truck access to the proposed project driveways. Similarly, the neighboring Goodman Center Project would also incorporate a truck access and routing plan and truck signage and striping to help accommodate truck access. It is assumed that the other cumulative projects would be designed in a manner consistent with the City's design standards and designs would be subject to review and approval by the City's Public Works Department. Consistency with the City's requirements would prevent implementation of design hazards. Accordingly, the proposed project in combination with the cumulative projects would not result in significant cumulative impacts associated with design hazards. Finally, the proposed project would allow for adequate emergency access via the two planned driveways. Similar to potential design hazards, it is assumed that the cumulative projects would be designed to meet the City's design standards and would be approved by the City prior to implementation. Therefore, the proposed project in combination with the cumulative projects would not result in significant cumulative impacts associated with emergency access.		
4.14: Tribal Cultural Resources		
Threshold TCR-1: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)? **No Impact.** The project site does not contain any "historical resources" as defined by CEQA. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines or PRC 5020.1(k). Native American consultation was conducted in compliance with AB 52. As part of the consultation process, a review of the SLF by the NAHC yielded negative results. Subsequently 21 Native American representatives were contacted by the City to determine their desire to consult on the proposed project. During that process, the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) stated that the project site is within their tribal territory and requested consultation with the City. The Kizh Nation was provided with a summary of the project and its location. No information regarding specific known tribal cultural resources on the project site was provided by the Kizh Nation. Therefore, the proposed project would not result in any impacts to tribal cultural resources that are listed or eligible for listing in the State or local register of historical resources. No mitigation is required.	No mitigation is required.	No Impact
Threshold TCR-2: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. **Less Than Significant with Mitigation Incorporated.** The project site is not likely to contain any prehistoric site or archaeological resources based on archival research and field surveys conducted for the project site. There is little potential for the proposed project to impact prehistoric resources due to the low likelihood of resource presence, significant prior disturbance from past grading and development activities on the project site and in the surrounding area. However**, Mitigation Measure CUL-1**, as provided in Section 4.2	Refer to **Mitigation Measure CUL-1** and **Regulatory Compliance Measure CUL-1**, which is provided above in **Threshold CUL-2,** and **CUL-3** under Cultural Resources. **Mitigation Measure TCR-1** **Mitigation Measure TCR-1 Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.** The project Applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation). The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project	Less Than Significant Impact.

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
Cultural Resources of the Draft EIR, has been included to mitigate potentially significant impacts associated with the unlikely discovery of archaeological resources, including tribal cultural resources (TCRs), on the project site. Therefore, implementation of **Mitigation Measure CUL-1** would reduce potentially significant impacts to unknown tribal cultural resources to a less than significant level. During the consultation process, The Kizh Nation provided mitigation measures to address potential impacts related to tribal cultural resources. Implementation of **Mitigation Measures TCR-1 through TCR-3**, which incorporate the recommendations of the Kizh Nation, would reduce any potential impacts to previously undiscovered tribal cultural resources to a less than significant level. Therefore, on this basis and as a result of the City's consultation with the Kizh Nation or any other interested local Native American tribe, the City has concluded that, with implementation of **Mitigation Measures TCR-1 through TCR-3**, potential impacts related to unknown buried tribal cultural resources would also be reduced below a level of significance.	description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground- disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project Applicant/lead agency upon written request to the Tribe. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh Nation from a designated point of contact for the project Applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh Nation to the project Applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh Nation TCRs. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh Nation monitor and/or Kizh Nation archaeologist. The Kizh Nation will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes. **Mitigation Measure TCR-2** **Unanticipated Discovery of Human Remains and Associated Funerary Objects.** Native American human remains are defined in Public Resources Code 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.	

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
	Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh Nation determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh Nation monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).) Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance. **Mitigation Measure TCR-3** **Procedures for Burials and Funerary Remains.** As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. In the event preservation in place is not possible despite good faith efforts by the project Applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.	

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
	Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.	
Cumulative Tribal Cultural Resources Impacts. **Less Than Significant Impact with Mitigation Incorporated.** The proposed project would result in less than significant impacts to known and unknown tribal cultural resources listed or eligible for listing in the California Register, in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or otherwise determined by the lead agency to be significant. Further, each individual development proposal received by the City that requires discretionary approval is required to undergo individual environmental review pursuant to CEQA. AB 52 outreach would be required for those discretionary projects for which a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report is prepared. Furthermore, impacts of other projects on tribal cultural resources are generally site-specific resulting from ground-disturbing activities, which would require unique impact analysis to determine the nature and extent of the resources and identify appropriate mitigation measures that would reduce or avoid significant impacts. Thus, there is no potential for the project to contribute towards a significant cumulative impact associated with the significance of a tribal cultural resource pursuant to California Code of Regulations Section 15064.5. Additionally, when resources can be assessed and/or protected as they are discovered, impacts to these resources are less than significant. As such, implementation of **Mitigation Measures TCR-1 through TCR-3** would ensure that the proposed project, together with the related projects, would not result in significant cumulative impacts to tribal cultural resources.	See Mitigation Measure **TCR-1 through TCR-3** under **Threshold TCR-2** above.	Less Than Significant Impact with Mitigation Incorporated.

2.0 INTRODUCTION

This Draft Environmental Impact Report (EIR) has been prepared to evaluate environmental impacts associated with the proposed 5665 Plaza Drive Project (proposed project) in Cypress, California. The proposed project would include the demolition of an existing 150,626-square-foot, five-story office building and the construction of a new 191,394-square-foot light industrial building. The proposed building would include 181,061 square feet of warehouse space and 10,333 square feet of office space. The maximum height of the proposed building would be approximately 51 feet, 6 inches, to the top of the parapet. The proposed project would include a truck loading area with 25 dock-high loading doors on the west side of the proposed building. The project site is currently accessible from two driveways along Plaza Drive which will be relocated as part of the project. The new westernmost driveway would be the primary truck access point and path to the truck-loading docks on the proposed building's west side. The eastern driveway would be a shared driveway with the parcel to the east. The proposed project would include parking stalls throughout the project site's perimeter, new water and sewer lines connecting with existing water and sewer mains within Plaza Drive, new stormwater infrastructure, and new ornamental landscaping.

The City of Cypress (City) is the "public agency which has the principal responsibility for carrying out or approving the project"[5] and, as such, is the "Lead Agency" for purposes of preparing an EIR for the proposed project under the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 *et seq*.). CEQA requires the Lead Agency to consider the information contained in the EIR prior to taking any discretionary action on the proposed project. This EIR is intended to serve as an informational document to be considered by the City and any Responsible Agencies during deliberations on the proposed project. CEQA Section 21069 defines a "Responsible Agency" as a public agency other than the Lead Agency that has responsibility for carrying out or approving a project. The approvals and permits associated with the proposed project are detailed further in Chapter 3.0, Project Description.

The City, as Lead Agency, determined that the proposed project may have a significant effect on the environment and that an EIR would be required to more fully evaluate potential adverse environmental impacts that may result from development of the proposed project. As a result, this EIR has been prepared in accordance with CEQA and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000 et seq.). This EIR also complies with the procedures established by the City for the implementation of CEQA.

2.1 PURPOSE AND USES OF THE EIR

This EIR has been prepared to evaluate potential environmental impacts that could result from implementation of the proposed project. As the Lead Agency, the City has the principal responsibility for approving the proposed project. In that capacity, the City has decided to prepare this EIR and, after the public review process, will decide whether to certify the Final EIR.

[5] As defined in Public Resources Code Section 21067.

The City and any Responsible Agencies have the authority to make decisions on discretionary actions relating to development of the proposed project. As stated previously, this EIR is intended to serve as an informational document to be considered by the City and Responsible Agencies during deliberations on the proposed project. This EIR evaluates a reasonable worst-case scenario of potential impacts associated with the proposed project and identifies feasible mitigation and alternatives for any identified potentially significant impacts.

This EIR will serve as a project EIR pursuant to State CEQA Guidelines Section 15161. According to Section 15161 of the State CEQA Guidelines, a project EIR is appropriate for specific development projects and should examine the environmental impacts that could result from all phases of the project, including planning, construction, and operation.

As the Lead Agency for the proposed project under CEQA, the City must consider the information contained in the Final EIR prior to taking any discretionary action with respect to the proposed project. This EIR provides information to the Lead Agency and other public agencies, the general public, and decision-makers regarding the potential environmental impacts from construction and operation of the proposed project. The purpose of the public review of this EIR is to evaluate the adequacy of the environmental analysis in terms of compliance with CEQA. State CEQA Guidelines Section 15151 states the following regarding the standards from which adequacy is judged:

> "An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts. The courts have not looked for perfection but for adequacy, completeness, and a good faith effort at full disclosure."

Public Resources Code Section 21002.1(a) states:

> "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided."

An EIR is the most comprehensive form of environmental documentation identified in CEQA and the State CEQA Guidelines and provides the information needed to assess the environmental consequences of a proposed project. EIRs are intended to provide an objective, factually supported, full-disclosure analysis of the environmental consequences associated with a proposed project that has the potential to result in significant, adverse environmental impacts.

2.2 ENVIRONMENTAL REVIEW PROCESS

In compliance with CEQA and the State CEQA Guidelines, the City has taken steps to promote opportunities for the public and other public agencies to participate in the environmental review process. An Initial Study (IS) was completed for the proposed project and the City initially determined that a Mitigated Negative Declaration (MND) would be prepared. However, based on

comments received from the public, the City decided that an EIR would be prepared to evaluate the potentially significant environmental effects of the proposed project and related actions. Preparation of an EIR required the City to engage in public scoping for the project. To conduct public scoping, the City issued a Notice of Preparation (NOP) of an EIR and held a public scoping meeting. The scoping process is further discussed below.

2.2.1 Notice of Preparation/Scoping Meeting

On May 7, 2024, an NOP for the EIR was posted to the City's website and distributed by the City via the State Clearinghouse (SCH). The NOP was circulated for review from May 7 to June 5, 2024. The SCH number for this EIR is SCH No. 2020069007. In accordance with State CEQA Guidelines Section 15082, the NOP was circulated to public agencies and interested individuals and was posted at the Orange County Clerk-Recorder's Office for a period of 30 days. A full list of the agencies and individuals contacted is presented in **Appendix A** of this EIR, Public Involvement. During the 30-day public scoping period, written comments were solicited pertaining to environmental issues/topics that this EIR should evaluate. The City held a virtual public scoping meeting on Tuesday, May 28, 2024, to present the proposed project and to solicit input from interested parties. One public comment was received during the Scoping Meeting.

Responses to the NOP were received from the following agencies:

- City of Los Alamitos
- Native American Heritage Commission (NAHC)

In addition, the following organizations and interested parties submitted written comments on the NOP:

- Allyssa J. Holcomb (on behalf of Warland Investments Company)

2.2.2 Issues Raised

Issues and concerns raised in response to the NOP or at the scoping meeting included:

Allyssa J. Holcomb, Garrett Stiepel Ryder, LLP, on behalf of Warland Investments Company

- **Air Quality**: Concern related to excessive air pollution due to the proposed project's foreseeable use as a logistics center. Concern that the proposed project failed to address the impact of refrigerated trucks on air quality and did not evaluate the air quality impact of off-site effects, such as vehicle and truck trips. Concerns regarding the short and long-term impacts to air quality in surrounding areas due to the proposed cumulative redevelopment of 5665 Plaza Drive. Stated that the proposed project does not consider the air quality impacts of refrigerated trucks accessing the project site and also fails to evaluate off-site air quality impacts.

- **Greenhouse Gas Emissions:** Concern that the proposed project would exceed the SCAQMD threshold and concerned that the analysis also fails to clearly evaluate the effects of off-site Greenhouse gas emissions. Concerns related to the failure to meet "Less than Significant" emissions by exceeding the 3,000 MT CO2e per year SCAQMD threshold and the failure to evaluate the effects of off-site GHG emissions.

- **Land Use:** Suggestion that the City should not only limit the scope of the EIR to current permitted uses.

- **Noise:** Concern related to increased noise generation due to the proposed project's foreseeable use as a logistics center

- **Traffic:** Concern related to increased traffic congestion due to the proposed project's foreseeable use as a logistics center. Concern related to the Truck Distribution Map in the Traffic Analysis for the proposed project. It was stated that the analysis failed to account for truck traffic from the entire Goodman Commerce Center (the 5665 Plaza Drive Project and the Goodman Commerce Center Project). It was stated that the proposed project made the incorrect assumption that 100 percent of truck traffic would exit via Driveway 1 and omitted detailed projections for truck routes, especially regarding the impact on nearby residential areas. Concern that the Traffic Analysis inaccurately estimated daily truck trips by solely evaluating the 5665 Redevelopment, rather than considering the entire Goodman Commerce Center as a logistics hub, leading to a significant underestimation of truck traffic impacts.

City of Los Alamitos

- **Air Quality**: Suggestion that the Draft EIR include an evaluation of the proposed project's impact on air quality due to the proposed change in land use.

- **Greenhouse Gas Emissions**: Suggestion that the Draft EIR include an evaluation of the proposed project's impact on Greenhouse Gas Emissions due to the proposed change in land use.

- **Noise**: Suggestion that the proposed project include an evaluation of 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.

- **Traffic**: Suggestion that the Draft EIR include the existing truck routes, the project's impact to and along the truck routes, and any impacts or needs to modify truck routes. Suggestion that the proposed project should provide a traffic and/or access analyses that evaluates the daily truck trips and their distribution and influence on Los Alamitos roadways.

NAHC

- **Tribal Cultural Resources**: Outlined the City's tribal consultation requirements under Assembly Bill 52 and Senate Bill 18

This is not an exhaustive list of areas of controversy, but rather key issues that were raised during the scoping process. Section 15064(e) of the State CEQA Guidelines states, "economic and social changes resulting from the project shall not be treated as significant effects on the environment." Therefore, economic issues are not addressed under CEQA and will not be address in this EIR. This EIR addresses each of the remaining areas of concern or controversy in detail, examines project-related and cumulative environmental impacts, identifies significant adverse environmental impacts, and proposes mitigation measures and/or alternatives designed to reduce or eliminate potentially

significant impacts. **Appendix A** includes the NOP and copies of written comments received in response to the NOP. **Appendix A** also includes a comment summary.

2.2.3 EIR Public Review Period

This EIR is being distributed to numerous public agencies and other interested parties for review and comment. This EIR is also available on the City's website:

> https://www.cypressca.org/departments/community-development/information-on-notable-projects/goodman-commerce-center-5665-plaza-drive

Additionally, a copy of this EIR will be available for public review at the Planning Division counter at Cypress City Hall located at 5275 Orange Avenue, Cypress, CA 90630.

All comments received from agencies and individuals on this EIR will be accepted during the public comment period, which will not be less than 45 days, in compliance with CEQA and *the* State CEQA Guidelines.

All comments on this EIR should be sent to the following City contact person:

> Alicia Velasco
> Planning Director
> City of Cypress
> Community Development Department
> 5275 Orange Avenue
> Cypress, CA 90630
> Email: avelasco@cypressca.org

Following the close of the public comment period, the City will prepare written responses to all written comments received during the public comment period and will compile these comments and responses, together with any text changes to this EIR, into a Final EIR that includes all of the information required pursuant to State CEQA Guidelines Section 15132. The Final EIR will be provided to all public agencies that submitted comments on this EIR at least 10 days prior to certification of the Final EIR. The Final EIR shall consist of the EIR or a revision of the draft; comments, and recommendations received on the EIR either verbatim or in summary; a list of persons, organizations, and public agencies commenting on the EIR; the response of the City to significant environmental points raised in the review and consultation process and in comments submitted on the Draft EIR; and any other information added by the City.

The City will make findings regarding the extent and nature of the impacts as presented in the Final EIR. The Final EIR must be certified as complete by the City Council prior to making a decision on the requested entitlements for the proposed project. Public input is encouraged at all public hearings regarding the proposed project.

2.3 SCOPE OF THIS EIR

As required by State CEQA Guidelines Section 15128, this EIR must identify the effects of the proposed project that are determined to be significant. The IS for the proposed project identified

impacts associated with Aesthetics, Agricultural/Forestry Resources, Biological Resources, Hazards & Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mineral Resources, Population/ Housing, Public Services, Recreation, Utilities/Service Systems, and Wildfire would all be less than significant. Accordingly, the environmental topics addressed in this EIR include Air Quality, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Noise, Transportation, and Tribal Cultural Resources.

2.4 FORMAT OF THE EIR

This EIR contains the information and analysis required by CEQA and the State CEQA Guidelines, including Sections 15122–15131, and is generally organized as follows:

- **Chapter 1.0: Executive Summary.** Chapter 1.0 contains the Executive Summary of this EIR, which lists all significant project impacts, feasible mitigation measures that have been recommended to reduce any significant impacts of the proposed project, and the level of significance of each impact following feasible mitigation. The summary is presented in a table format.

- **Chapter 2.0: Introduction.** Chapter 2.0 contains a discussion of the purpose and intended use of this EIR.

- **Chapter 3.0: Project Description.** Chapter 3.0 includes a discussion of the proposed project's geographical setting, the project site's previous uses, and the proposed project's objectives, characteristics, components, and construction phases, as well as the anticipated discretionary and ministerial permits and approvals for the proposed project.

- **Chapter 4.0: Environmental Impact Analysis.** Chapter 4.0 includes an analysis of the proposed project's environmental impacts. It is organized into the following topical sections: Air Quality, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Noise, Transportation, and Tribal Cultural Resources. The environmental setting discussions describe the "existing conditions" of the environment on the project site and in the vicinity of the site as they pertain to the environmental issues being analyzed (State CEQA Guidelines Section 15125).

  The impact discussions identify and focus on the potentially significant environmental effects of the proposed project. The direct and indirect effects of the proposed project on the environment are identified and described, giving due consideration to both the short-term and long-term effects, as necessary (State CEQA Guidelines Section 15126.2[a]).

  Chapter 4.0 also includes within the analysis of each environmental topic a discussion of the cumulative effects of the proposed project when considered in combination with other projects causing related impacts, as required by State CEQA Guidelines Section 15130. Cumulative impacts are based on the build out of the proposed project and the known relevant approved and proposed projects in the surrounding area.

  The discussions of mitigation measures identify and describe feasible measures that could minimize or lessen potentially significant impacts for each significant environmental effect identified in this EIR (State CEQA Guidelines Section 15126[e]). The levels of significance before

and after mitigation are provided. Significant unavoidable adverse effects are identified where mitigation is not expected to reduce the effects to less than significant levels.

- **Chapter 5.0: Alternatives to the Proposed Project.** In accordance with CEQA, the alternatives discussion in Chapter 5.0 describes a reasonable range of alternatives that could feasibly attain the basic objectives of the proposed project and are capable of eliminating or substantially reducing any of the proposed project's significant adverse environmental effects or reducing them to a less than significant level. The alternatives analyzed in Chapter 5.0 include four alternatives: (1) the No Project Alternative, (2) the Reduced Footprint Alternative, (3) the No Refrigeration Warehouse Alternative, and (4) the Modified Geotechnical Approach Alternative.

- **Chapter 6.0: Other CEQA Considerations.** Chapter 6.0 contains discussions on the following topics as required by State CEQA Guidelines Section 15126: (1) growth-inducing impacts of the proposed project; and (2) whether there are any significant irreversible environmental changes caused by the proposed project, adverse environmental impacts associated with the proposed project for which either no mitigation or only partial mitigation is feasible.

- **Chapter 7.0: Mitigation Monitoring and Reporting Program.** State CEQA Guidelines Section 15091(d) requires that public agencies adopt a mitigation monitoring and reporting program for any changes that it has either required in a project or made a condition of approval to avoid or substantially lessen significant environmental effects. Chapter 7.0 provides a list of all proposed project mitigation measures, defines the parties responsible for implementation and review, and identifies the timing for implementation of each mitigation measure.

- **Chapter 8.0: Significant Unavoidable Impacts.** Chapter 8.0 summarizes the significant unavoidable adverse impacts that cannot be avoided or mitigated as identified in Chapters 4.0 and 6.0.

- **Chapter 9.0: List of Preparers.** Chapter 9.0 provides the organizations and persons contacted during preparation of this EIR, the EIR preparers and technical report authors, and other experts involved in the preparation of this EIR.

- **Chapter 10.0: References.** Chapter 10.0 provides the references used in this EIR.

2.5 INCORPORATION BY REFERENCE

An EIR may incorporate by reference all or portions of another document that is a matter of public record or is generally available to the public, consistent with State CEQA Guidelines Section 15150. Informational details from the documents that have been incorporated by reference are summarized in the appropriate sections of this EIR, along with descriptions regarding how the public may review these documents. All documents are available for review at the City of Cypress, Community Development Department. These documents include:

- City of Cypress General Plan (available online at: https://www.cypressca.org/government/departments/community-development/planning-division/city-plans)

- City of Cypress Municipal Code (available online at: https://qcode.us/codes/cypress/)
- McDonnell Center Amended Specific Plan (available online at: https://www.cypressca.org/home/showpublisheddocument/9697/637363718993530000)

3.0 PROJECT DESCRIPTION

This chapter of the EIR describes the proposed 5665 Plaza Drive Project (proposed project), including the project overview and a description of the proposed project's location, objectives, and the approvals required for project implementation.

3.1 PROJECT APPLICANT

GLC Cypress LLC
c/o Goodman North America Management
3333 Michelson, Suite 1050
Irvine, CA 92612
Project Representative: Blair Dahl

3.2 LEAD AGENCY CONTACT PERSON

Consistent with State CEQA Guidelines Section 15050, the City of Cypress is the Lead Agency under CEQA and is responsible for adoption of the EIR and approval of the proposed project.

Alicia Velasco
Planning Director City of Cypress
5275 Orange Avenue
Cypress, CA 90630
Phone: (714) 229-6720
Email: avelasco@cypressca.org

3.3 PROJECT OVERVIEW

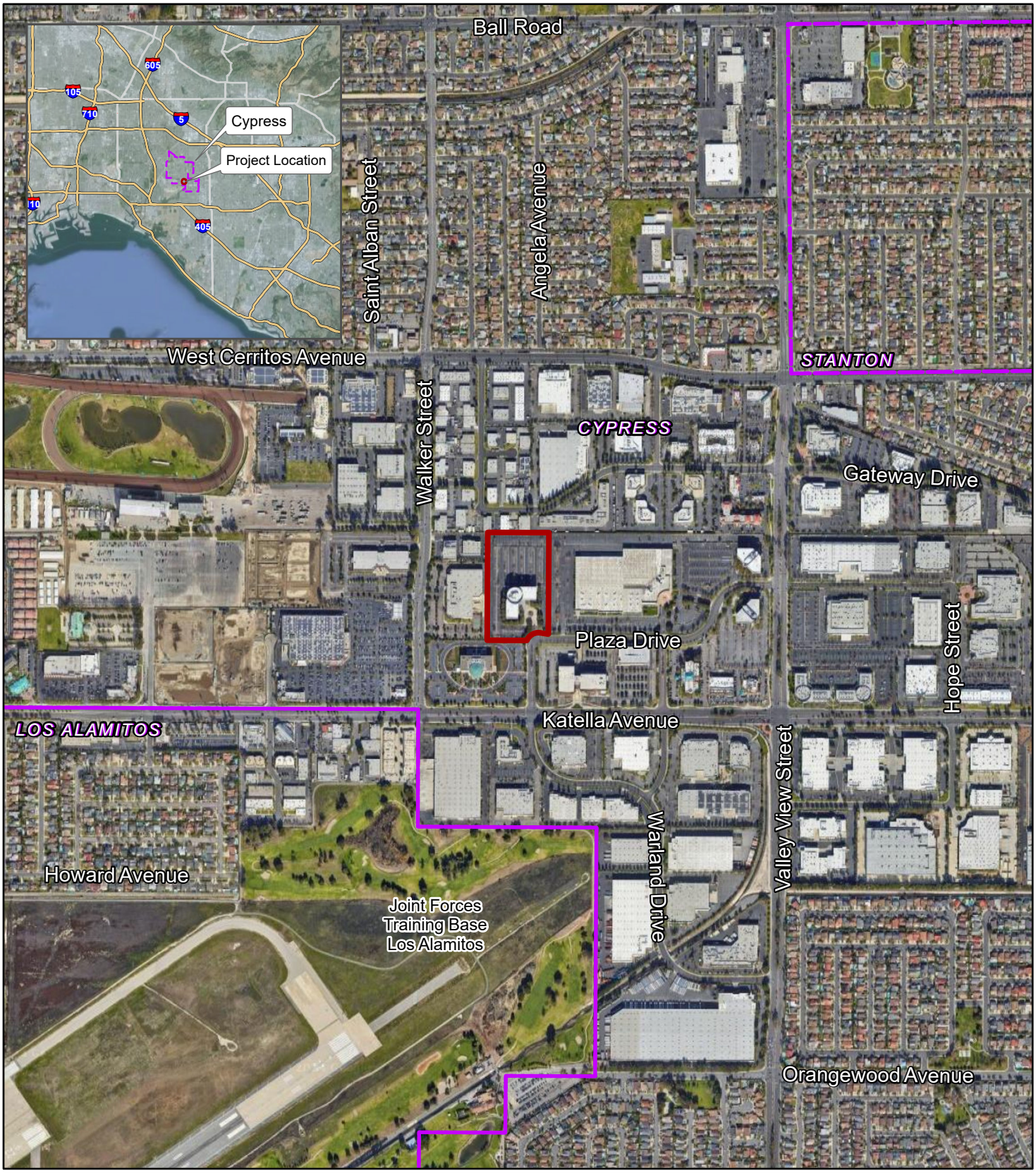
Goodman (the Project Applicant) proposes to demolish an existing 150,626-square-foot five-story office building on an 8.53-acre site at 5665 Plaza Drive (project site) in the city of Cypress and construct a new 191,394-square-foot light industrial building, with associated office space, landscaping, surface parking, and utility improvements.

3.4 PROJECT LOCATION AND SITE DESCRIPTION

3.4.1 Regional Location

The project site is in the southern part of the city of Cypress at 5665 Plaza Drive, north of the intersection of Plaza Drive and Douglas Drive. The city of Cypress is located in northwestern Orange County, California, approximately 20 miles southeast of downtown Los Angeles. The project site is approximately 3.5 miles south of State Route 91 (SR-91), approximately 4.75 miles southwest of Interstate 5 (I-5), approximately 2.75 miles east of Interstate 605 (I-605), and approximately 2.2 miles north of State Route 22 (SR-22). Local access to the project site is provided via Plaza Drive. **Figure 3.1, Regional and Project Site Location**, shows the location of the project site within Cypress and northwestern Orange County.

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FIGURE 3.1

SOURCE: Google Maps (2023)

J:\CCP2201.04\GIS\Pro\Cypress 5665 Plaza Drive Project\Cypress 5665 Plaza Drive Project.aprx (5/28/2024)

5665 Plaza Drive Project Draft Environmental Impact Report

Regional and Project Site Location

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3.4.2 Existing Project Site Conditions

The project site is currently developed with a 150,626-square-foot, five-story, office building, a surface parking lot, and ornamental landscaping. As of May 2024, the existing office building was vacant and had no tenants. However, the existing office building has historically been occupied. The current vacancy of the existing office building is not consistent with historic on-site operations, which may be re-established under existing regulations. In August 2023, 61,756 square feet (approximately 41 percent) of the existing 150,626 square foot building was leased and occupied by Toyo Tire and an accounting firm. To be conservative, the analysis in this EIR assumes a baseline condition of 37,657 square feet or 25 percent occupancy. This conservative estimate is lower than the historic occupancy levels, as reflected by the previous tenant conditions in August 2023.

The project site is bounded by industrial and office uses to the north, industrial uses to the west, Plaza Drive to the south, and the Goodman Commerce Center Project to the east. The Goodman Commerce Center Project, approved in April 2023, was under construction at the time of the preparation of this EIR. The Goodman Commerce Center Project consists of two light industrial buildings totaling 390,268 square feet. **Figure 3.2, Aerial Photograph and Surrounding Land Uses,** depicts the project site in a local setting.

3.5 GENERAL PLAN, SPECIFIC PLAN, AND ZONING

3.5.1 General Plan/Specific Plan

The City of Cypress General Plan Land Use Policy Map designates the project site as "Specific Plan Area." **Figure 3.3, General Plan Land Use in the Project Area,** depicts General Plan land uses at the project site and in the surrounding areas. The project site is in the McDonnell Center Amended Specific Plan (Specific Plan) area, shown in **Figure 3.4, McDonnell Center Specific Plan Area**. The McDonnell Center Amended Specific Plan covers approximately 71 acres in the southeastern portion of the City. The project site is within Planning Area 1 of the Specific Plan area and is currently designated for general office uses.

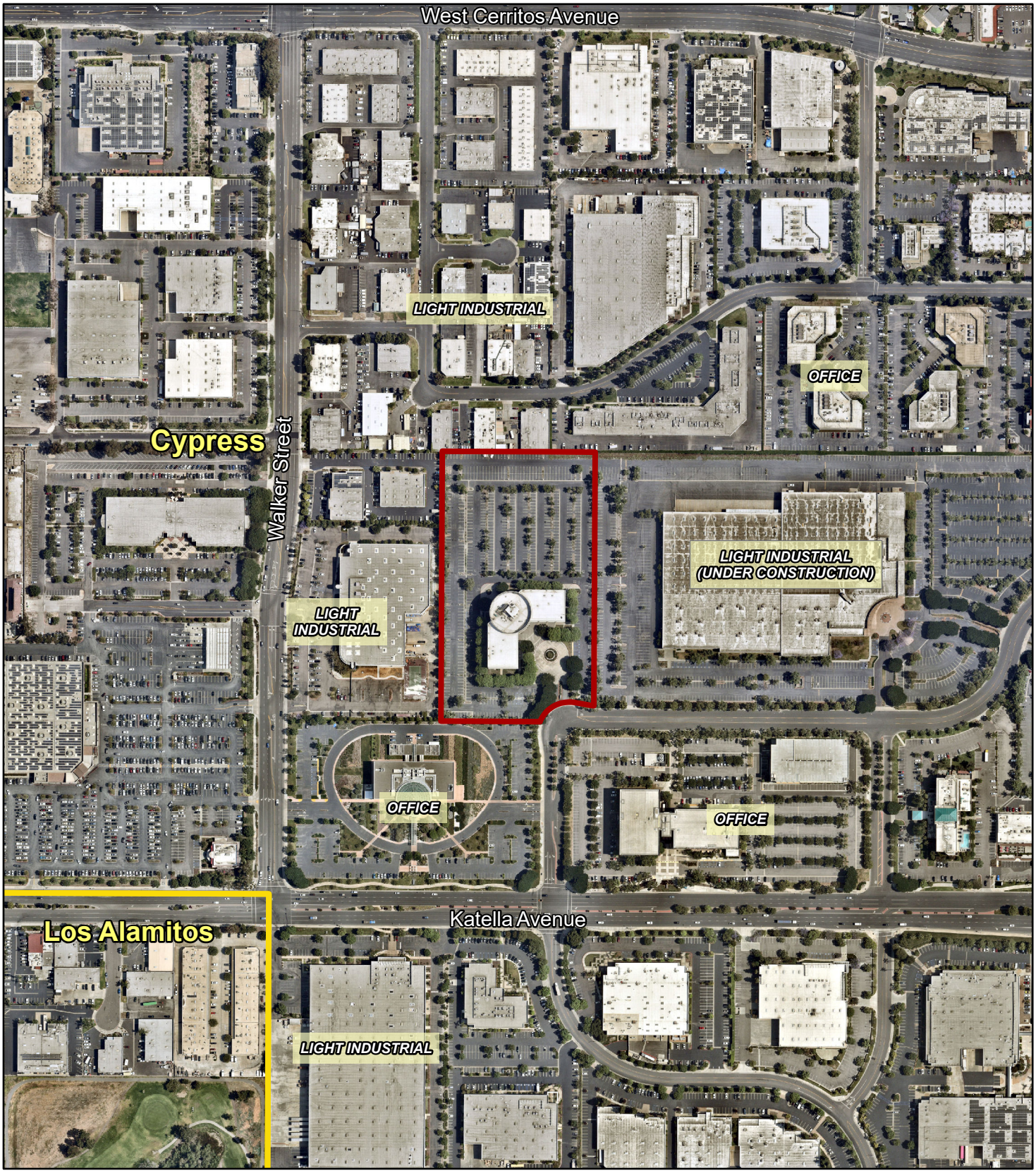
3.5.2 Current Zoning

Figure 3.5, Existing Zoning Map, depicts zoning for the City. The project site is located in a PC (Planned Community) zoning district. The City's zoning ordinance describes PC zoning districts as being:

> …established to provide opportunity for the design and development of integrated, master-planned projects in areas of the city which may benefit from special design standards and land uses not otherwise possible under conventional zoning district regulations. The PC zoning district is intended to permit a compatible mix of land uses, planned commercial developments, and business parks, and a variety of housing styles and densities. The PC zoning district is consistent with all residential and business park land use designations of the general plan. Each PC zoning district established shall be indicated by a unique zoning district designation.[6]

[6] City of Cypress Municipal Code, Section 2.08.020(C), PC (Planned Community) Zoning District. Website: https://ecode360.com/43174998 (accessed May 10, 2024).

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Project Site

City Boundary

FIGURE 3.2

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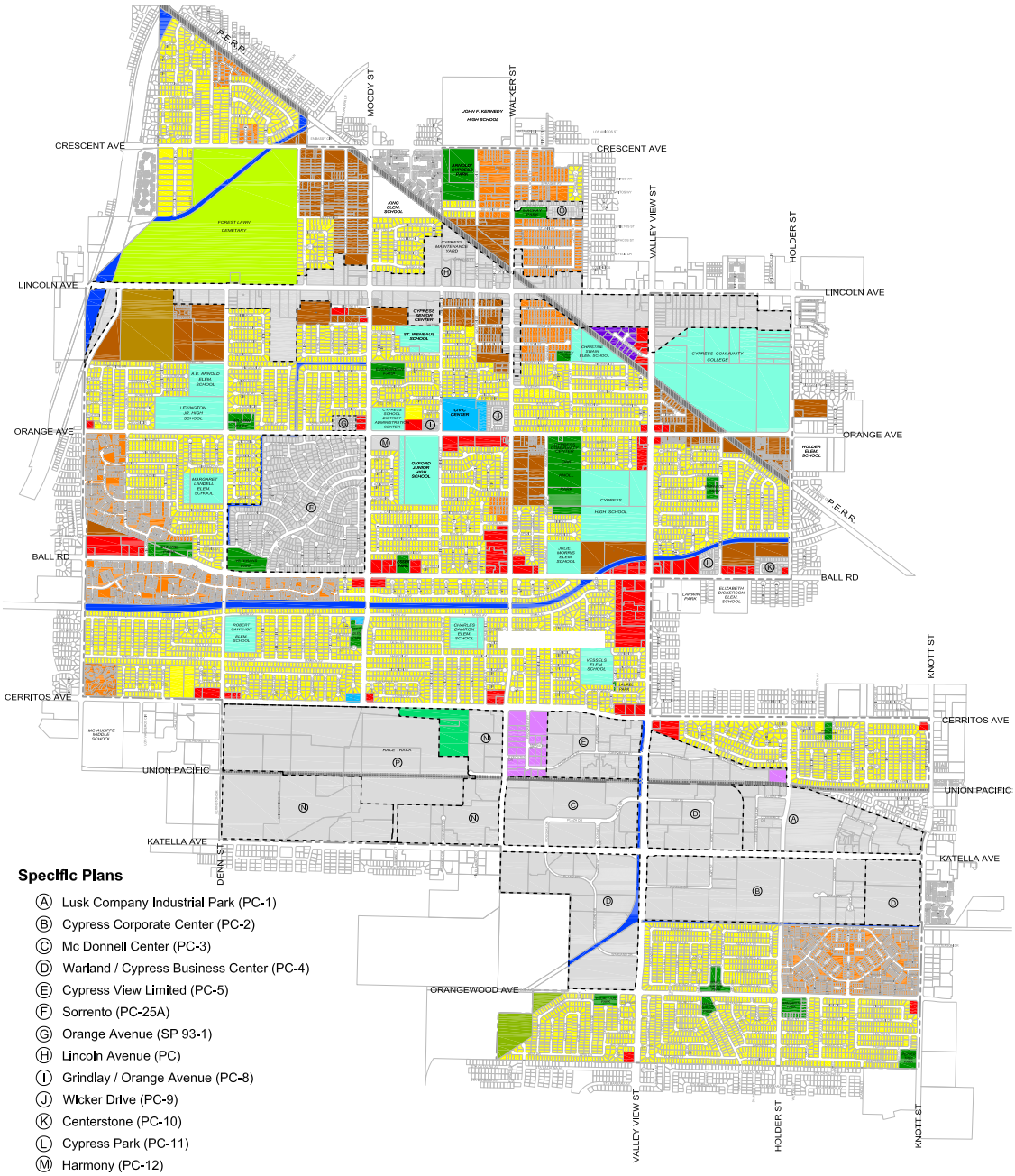
SOURCE: Nearmap (June 17, 2023)

5665 Plaza Drive Project Draft Environmental Impact Report

Aerial Photograph and Surrounding Land Uses

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FIGURE 3.3

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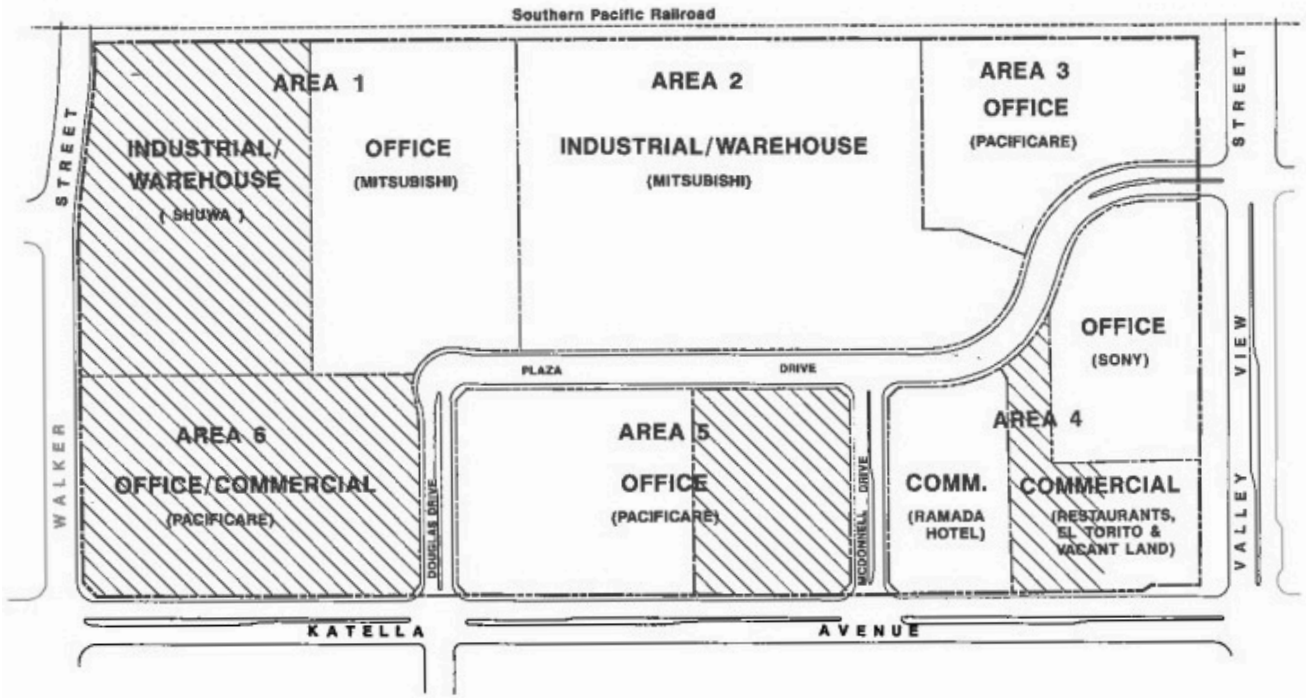
SOURCE: City of Cypress

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5665 Plaza Drive Project Draft Environmental Impact Report

General Plan Land Use in the Project Area

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Area	Net Acres	Existing SF	Proposed SF	Ultimate Total
1	16.14	151,000	210,000	361,000
2	15.32	338,653	0	338,653
3	5.02	106,866	0	106,866
4	10.54	219,816	9,000	228,816
5	9.18	206,895	150,000	356,895
6	8.47	0	368,000*	368,000*
Total (net)	64.67	1,023,230	737,000	1,760,230
Roads	6.56			
Total (gross)	71.23	1,023,230	737,000	1,760,230

* Includes 10,000 square foot child care facility

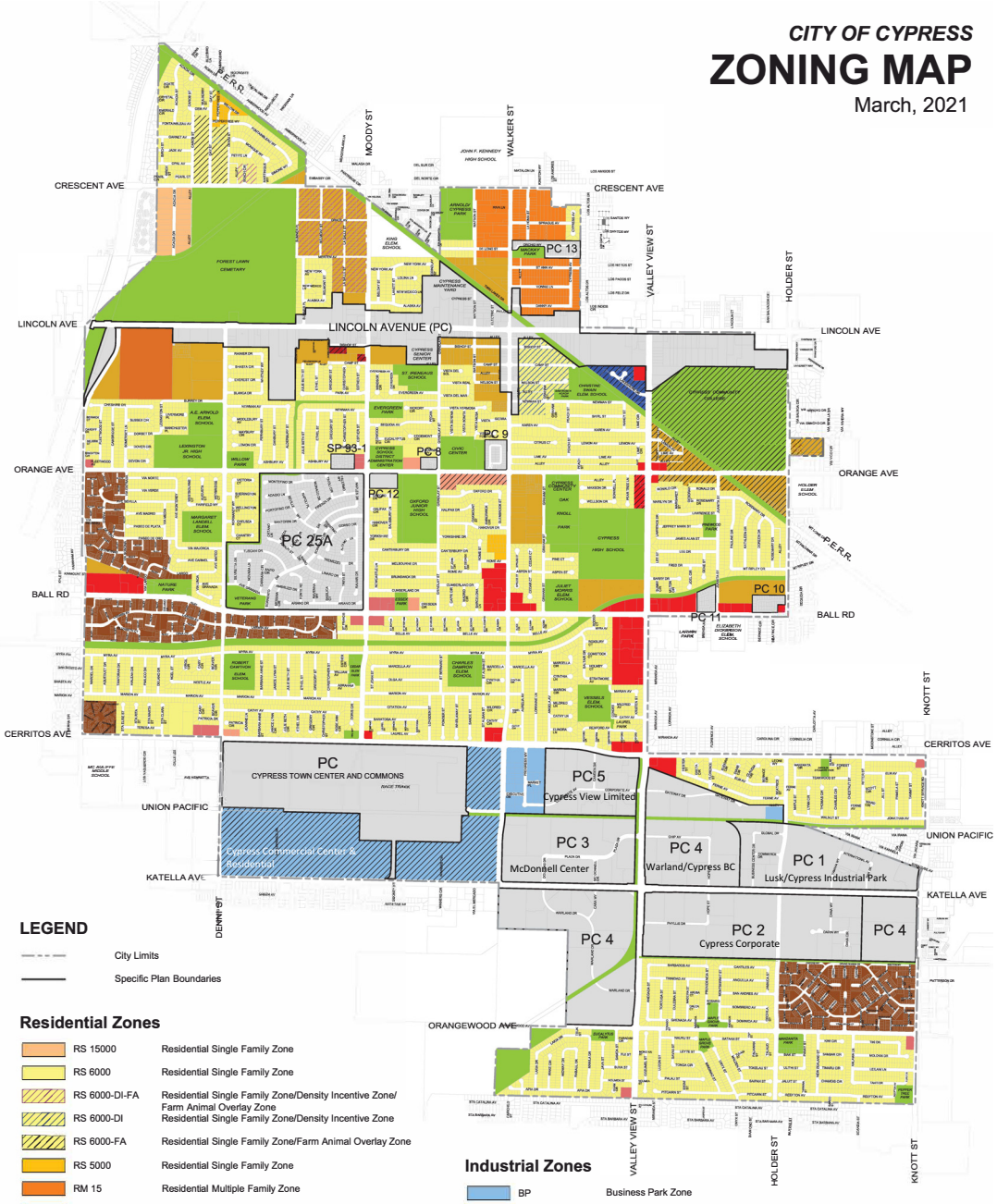
Approved Specific Plan (1982)	1,554,100 square feet
Proposed Specific Plan Amendment	1,760,230 square feet
Increase	206,130 square feet

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FIGURE 3.4

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FIGURE 3.5

NOT TO SCALE

SOURCE: City of Cypress

I:\CCP2201.04\G\Zoning_Map.ai (5/15/2024)

5665 Plaza Drive Project Draft Environmental Impact Report

Existing Zoning Map

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With the exception of certain uses, the zoning ordinance defers to the specific plan in identifying permissible and conditionally permissible uses. The project site is in the PC-3, McDonnell Center Planned Community Zone, and applicable zoning is provided in the McDonnell Center Amended Specific Plan. The McDonnell Specific Plan Area is divided into six planning areas that are designated for industrial/warehouse, office, or commercial uses. The McDonnell Specific Plan also constitutes the zoning for the project site. In its existing condition Planning Area 1 currently includes light industrial uses in the western portion of the planning area and office uses in the eastern portion of the planning area. The project site is within the eastern portion of Planning Area 1 and is currently designated for general office uses. The proposed project would not include or require any amendments to the City's General Plan or City's Zoning Ordinance; however, the project does include a proposed amendment to the McDonnell Specific Plan to allow light industrial uses within the eastern portion of Planning Area 1, and removal of the maximum developable area requirement while retaining the 1.0:1 FAR to maintain consistency with the General Plan. Office uses would still be allowed within the eastern portion of Planning Area 1.

3.6 PROJECT CHARACTERISTICS

3.6.1 Project Objectives

The City has established the following intended specific objectives for the proposed project that would serve to aid decision-makers in their review of the proposed project and its associated environmental impacts:

1. To meet a greater market demand for state-of-the-art light industrial buildings by replacing a vacant office building.
2. To promote development that will attract new businesses to operate in the City.
3. To encourage business development that will generate a range of employment opportunities for the community.
4. To help attract new business enterprises that will result in a positive flow of revenue to the City.
5. To establish a use consistent with the business park and light industrial uses in proximity to the project site.

3.6.2 Project Characteristics

The proposed project includes the demolition of the existing five-story office building on the project site and the construction of a concrete tilt-up light industrial building with associated office and warehouse uses, inclusive of a second-story office mezzanine and attendant loading docks. The proposed building would be 191,394 square feet in size, and the project includes associated site improvements such as landscaping, surface parking, and utility improvements.

3.6.3 Site Design/Layout

The proposed project would include one new light industrial building with a truck loading area on the west side and surface automobile parking along the remaining sides of the proposed building. **Figure 3.6, Conceptual Site Plan**, shows the conceptual site plan for the proposed project. The proposed building is depicted in **Figure 3.7, Proposed Project Renderings**, and **Figure 3.8, Proposed Building Finishes**, presents the finishes for the proposed building.

The proposed building would be 191,394 square feet in size, including 181,061 square feet of warehouse space and 10,333 square feet of office space (5,184 square feet on the first floor and 5,149 square feet on the second floor). The proposed office space would be located at the southeast corner of the building. The maximum building height would be approximately 51 feet, 6 inches, to the top of the parapet on the northeast and southeast corners of the building; however, the majority of the building would have a maximum height of 40 feet.

The proposed building would include a truck loading area with 25 dock-high loading doors on the west side of the building. The loading area would be recessed and not visible from the public right-of-way along Plaza Drive. Other than the truck loading area, surface parking, providing 206 parking stalls, and landscaped areas would generally surround the perimeter of the proposed building.

3.6.4 Operational Characteristics

The ultimate tenant has not been identified at this time; therefore, specific details about the future operation of the proposed building are not available. This analysis assumes that the proposed building would operate 24 hours per day, 7 days per week, depending on business and operational needs. Additionally, it is assumed that up to 100 percent of the warehouse space would be refrigerated, and that up to 100 percent of all trucks accessing the project site would have transport refrigeration units.

3.6.5 Access and Parking

The project site is currently accessible from two driveways along Plaza Drive. The proposed project would relocate the driveway locations. The new westernmost driveway would be the primary truck access point and path to the truck-loading docks on the proposed building's west side. The eastern driveway would be a shared driveway with the parcel to the east.

A total of 206 surface parking stalls would be provided around the project site's perimeter, consisting of 156 standard stalls, 4 standard accessible parking stalls, 4, van accessible parking stalls, 11 electric vehicle charging stations (EVCS), and 31 electric vehicle supply equipment (EVSE) stalls.

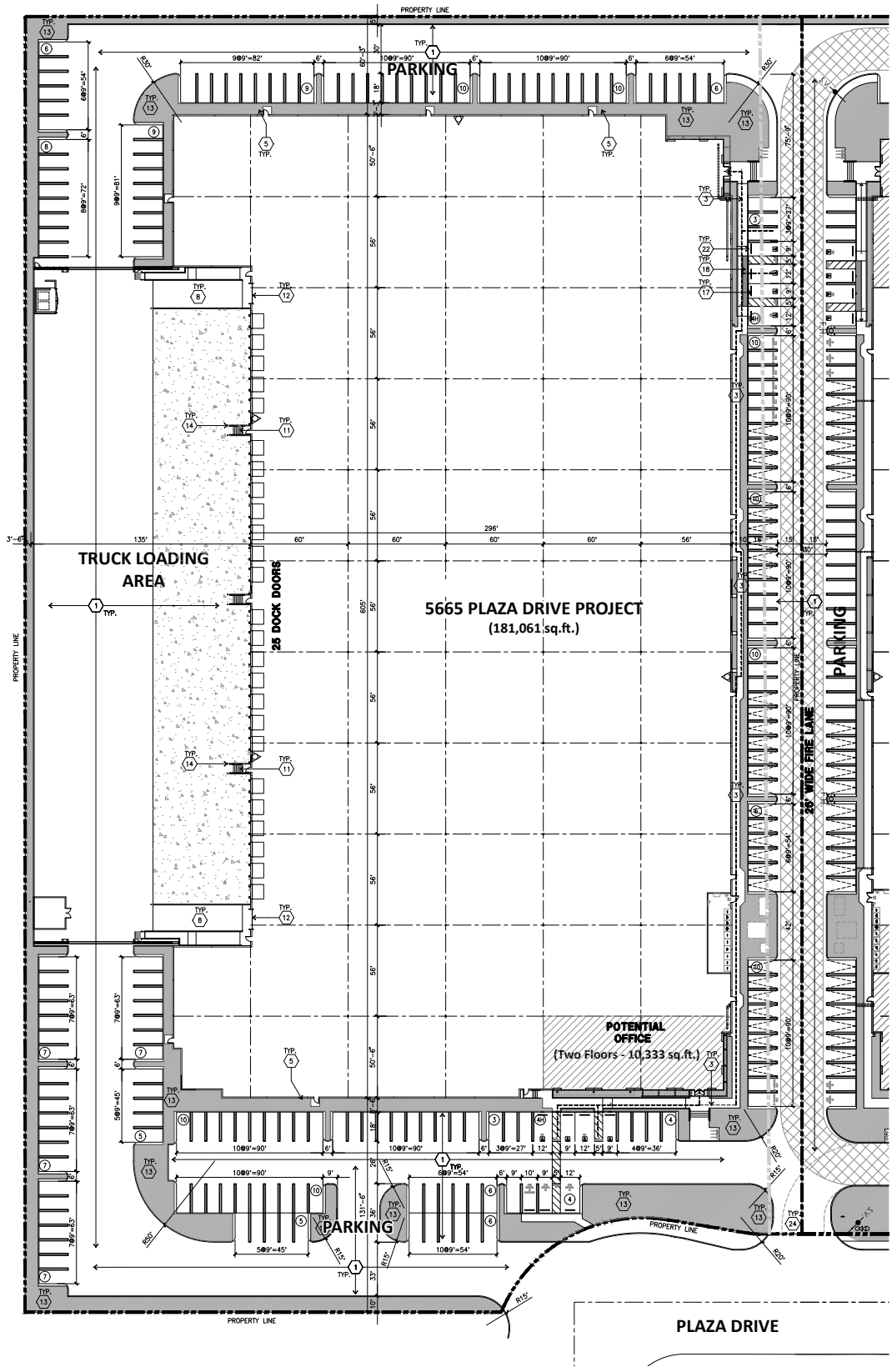


FIGURE 3.6

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SITE PLAN GENERAL NOTES

- CONCRETE PAVING – RE: CIVIL DRAWINGS THICKNESS
- STANDARD PARKING STALL 9' X 18'
- ACCESSIBLE PARKING STALL, 9'X18+5'W ACCESSIBLE AISLE
- VAN ACCESSIBLE 12'X18'+5'W ACCESSIBLE AISLE
- EV PARKING
- CLEAN AIR/VANPOOL/EV (PROVIDE CONDUIT FOR FUTURE EV CHARGING) STALL (9' X 18')
- EV AMBULATORY PARKING STALL (10' X 18')
- LIGHT STANDARD
- 26' WIDE FIRE LANE. PROVIDE RED CURBS AND SIGNAGE PER FIRE DEPT REQUIREMENT
- FIRE HYDRANT– APPROXIMATE LOCATION
- PROPERTY BOUNDARY

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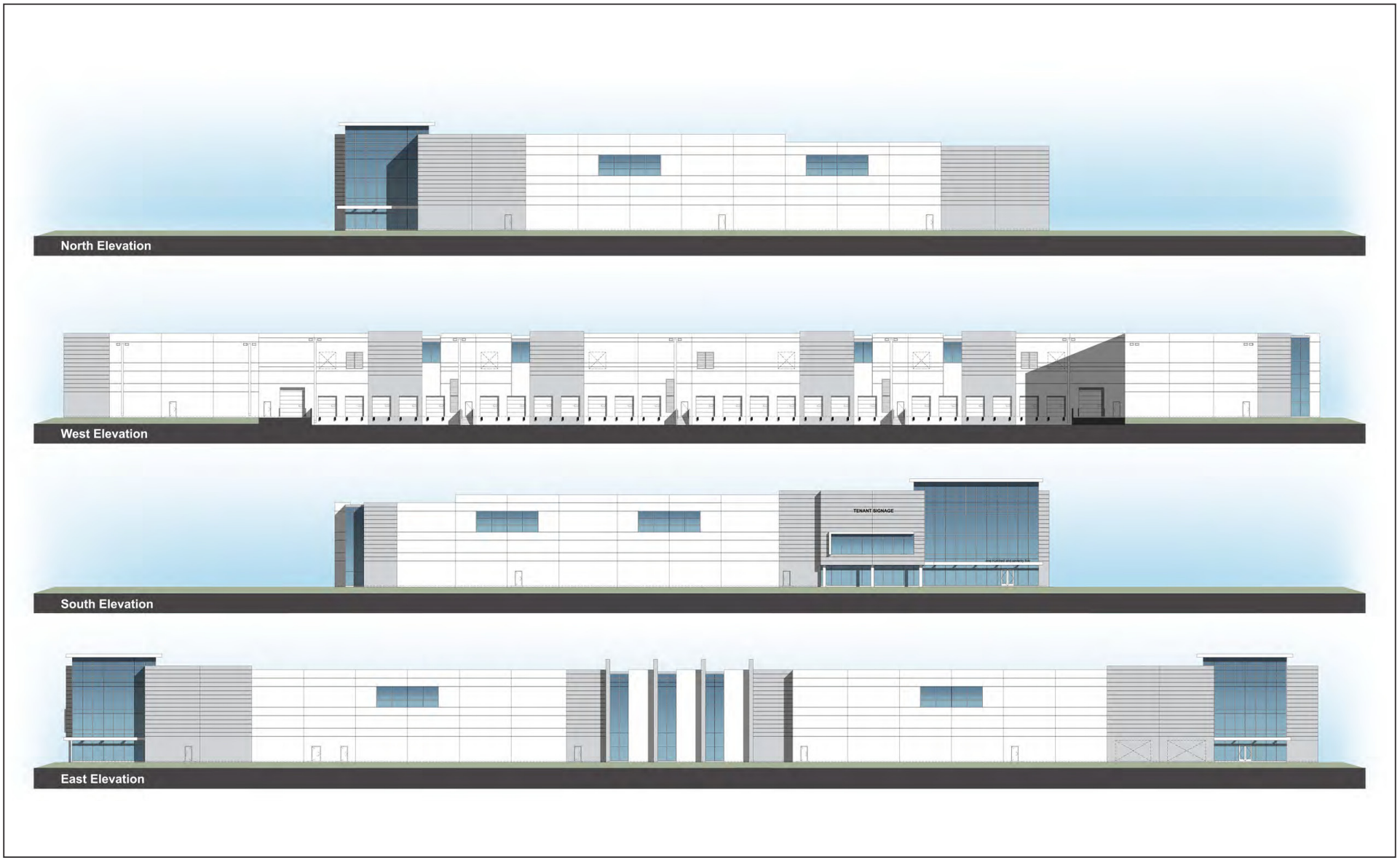
SOURCE: HPA

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Conceptual Site Plan

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FIGURE 3.7

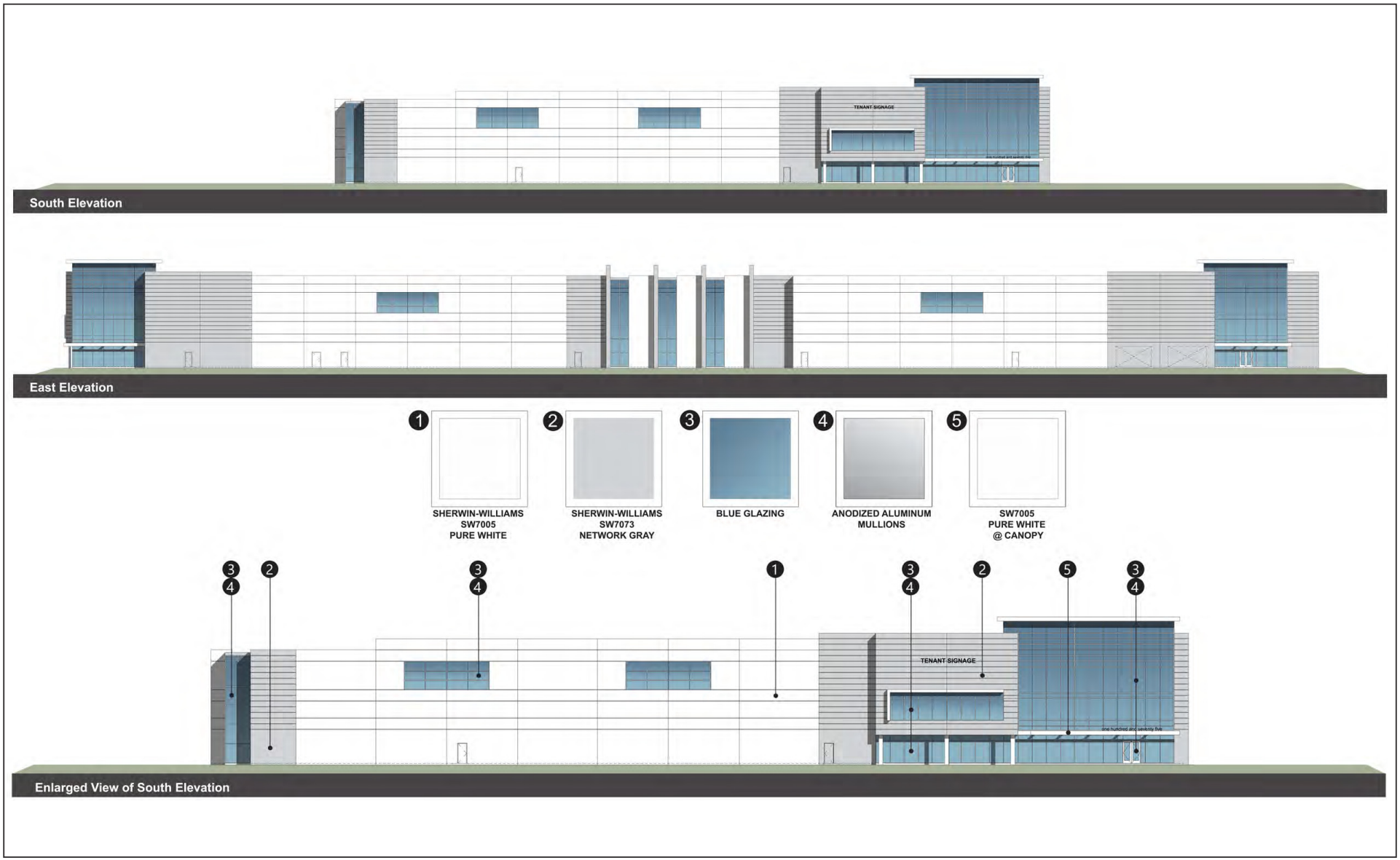
5665 Plaza Drive Project Draft Environmental Impact Report

Proposed Project Renderings

SOURCE: HPA

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FIGURE 3.8

5665 Plaza Drive Project Draft Environmental Impact Report

Proposed Building Finishes

SOURCE: HPA

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3.6.6 Landscaping

The majority of on-site landscaping would be along the perimeter of the project site and within the surface parking lot. Trees and ornamental vegetation would border the project site on all sides. Additional landscaping would be provided near the eastern driveway from Plaza Drive, which would include enhanced landscaped areas and decorative paving. The proposed project would result in the removal and replacement of several trees. To the extent feasible, the proposed project would use drought-tolerant vegetation and non-invasive plantings, consistent with Chapter 29, Article I, Water Efficient Landscape Requirements, of the City's Municipal Code. Parking areas would feature landscaping consistent with Cypress Municipal Code Section 3.13.060, which requires that parking areas include landscaped buffer zones between parking areas and rights-of-way, and between parking areas and drive aisles. The landscaping plan for the proposed project is shown on **Figure 3.9, Proposed Project Landscaping Plan**.

3.6.7 Utilities and Drainage

New water and sewer lines would be constructed on site and would connect to the existing water lines and sewer mains within Plaza Drive. An underground stormwater chamber, allowing for capture and treatment of stormwater that falls on the project site, would be constructed beneath the truck loading area along the west side of the building. The stormwater chamber would be approximately 8 feet wide and 403 feet long and extend approximately 8 feet in depth. The electrical utilities for the project site would be provided by Southern California Edison (SCE) and connect to existing infrastructure in the public right-of-way along Plaza Drive adjacent to the project site. Solid waste services would be provided by Valley Vista Services of Orange County.

The proposed project would be required to comply with all federal, State, and local regulations related to drainage and water quality. After project grading and construction, the proposed project would increase the impervious surface area on the project site by 28,374 square feet.

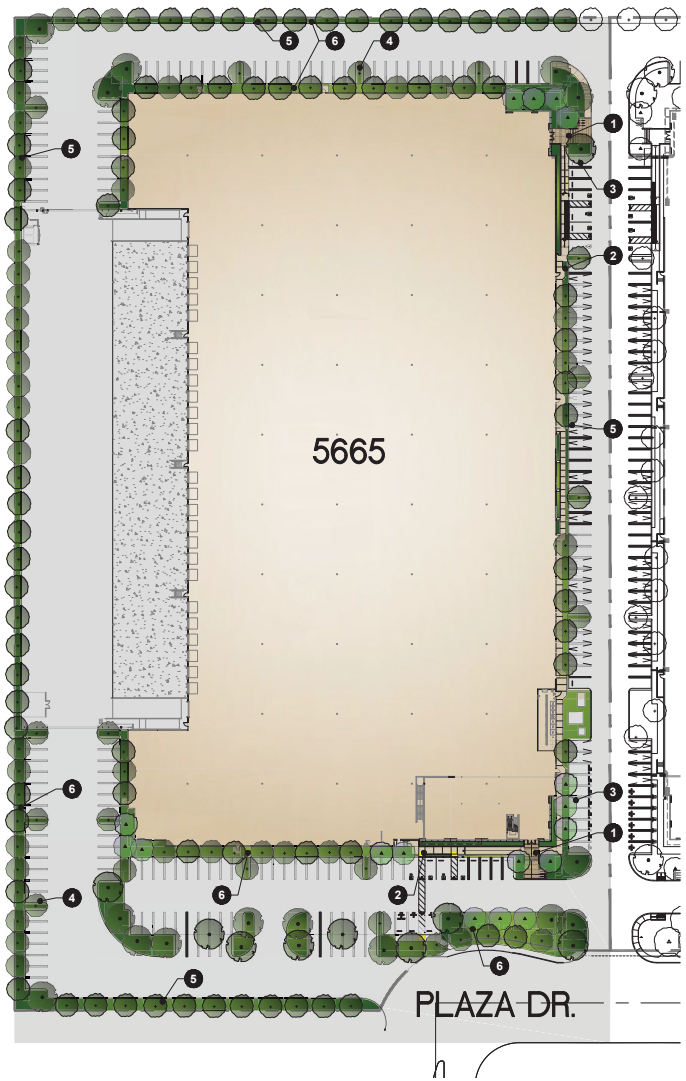
3.6.8 Project Design Features

The proposed project would be designed to comply with the water efficiency and energy conservation requirements included in the California Building Standards Code (California Code of Regulations [CCR], Title 24). Building features necessary to achieve Leadership in Energy and Environmental Design (LEED) Certified would be incorporated.

3.6.9 Construction Schedule

Development of the proposed project would require the demolition of the existing structure on the site, excavation and grading of the site, delivery of materials and personnel, construction of the building and parking areas, and landscaping of the project site. Construction of the proposed project would take place in a single phase. Demolition is anticipated to take 60 days, and construction is anticipated to take approximately 10 months. Construction is tentatively anticipated to begin in October 2024 and end in July 2025. Construction is expected on weekdays between the hours of 7:00 a.m. and 5:00 p.m. Per Section 13-70 of the City's Municipal Code, Special Provisions, construction is permitted within the City between 7:00 a.m. and 8:00 p.m. on weekdays, and 9:00 a.m. and 8:00 p.m. on Saturdays. No noise-generating construction activities are permitted on Sundays or federal holidays.

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ONSITE PLANT SCHEDULE

TREES

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE / FORM	HT. X SPRD. X CAL. (MIN.)	WATER USE	DESCRIPTION
	LAGERSTROEMIA FAUERI 'TUSCARORA'	TUSCARORA CRAPE MYRTLE	24" BOX STD.	8'H X 5'W X 4"C	M	FLOWERING TREE
	LOPHOSTEMON CONFERTUS	BRISBANE BOX	24" BOX STD.	8'H X 5'W	M	EVERGREEN CANOPY
	TIPUANA TIPU	TIPU TREE	36" BOX STD.	14' H X 6'W	L	SEMIDECIDUOUS BROAD CANOPY

SHRUBS, GRASSES, & GROUNDCOVERS

SYMBOL	KEY	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WATER USE	DESCRIPTION
	AGA VIL	AGAVE VILMORINIANA	OCTOPUS AGAVE	15 GAL.	60" O.C.	L	ACCENT SUCCULENT
	ALO BE	ALOE 'BLUE ELF'	BLUE ELF ALOE	1 GAL.	24" O.C.	L	ACCENT SUCCULENT
	CAL LJ	CALLISTEMON 'LITTLE JOHN'	LITTLE JOHN BOTTLE BRUSH	5 GAL.	36" O.C.	L	MIDGROUND FLOWERING SHRUB
	CAR GC	CARISSA M. 'GREEN CARPET'	DWARF NATAL PLUM	1 GAL.	30" O.C.	L	EVERGREEN LOW SHRUB
	CAR DIV	CAREX DIVULSA	BERKELEY SEDGE	1 GAL.	24" O.C.	L	ORNAMENTAL GRASS
	DIA LR	DIANELLA 'LITTLE REV'	LITTLE REV FLAX LILY	1 GAL.	24" O.C.	L	UPRIGHT ACCENT
	DIA VAR	DIANELLA T. 'VARIEGATA'	VARIEGATED FLAX LILY	5 GAL.	36" O.C.	M	UPRIGHT ACCENT
	FES MAI	FESTUCA MAIREI	ATLAS FESCUE	1 GAL.	24" O.C.	L	ORNAMENTAL GRASS
	JUN PAT	JUNCUS PATENS	CALIFORNIA GRAY RUSH	1 GAL.	24" O.C.	L	MODULAR WETLAND PLANT
	LAN NG	LANTANA 'NEW GOLD'	NEW GOLD LANTANA	5 GAL.	36" O.C.	VL	FLOWERING LOW SHRUB
	MUH ET	MUHLENBERGIA 'EL TORO'	BULL RUSH	1 GAL.	36" O.C.	L	ORNAMENTAL GRASS
	OLE MON	OLEA 'MONTRA'	LITTLE OLLIE	5 GAL.	48" O.C.	L	LARGE SHRUB
	WES WG	WESTRINGIA 'WYNYABBIE GEM'	COAST ROSEMARY	5 GAL.	36" O.C.	L	EVERGREEN HEDGE
	CAL HAE	CALLIANDRA HAEMATOCEPHALA	RED POWDER PUFF	15 GAL.	15' O.C.	M	FLOWERING VINE

WATER USE KEY:
VL = VERY LOW WATER USE, L = LOW WATER USE, M = MODERATE WATER USE, H = HIGH WATER USE. WATER USE STATED IS PER 'WATER USE CLASSIFICATION OF LANDSCAPE SPECIES' (ALSO REFERRED TO AS WUCOLS IV) FOR THE CITY OF CYPRESS, CA.

EXISTING TREE DISPOSITION

EXISTING TREES REMOVED	157
NEW TREES PROPOSED	173

LEGEND

1. ENHANCED PAVING AT BUILDING ENTRY
2. CONCRETE WALKWAYS
3. PROPOSED ACCENT TREES
4. PROPOSED PARKING TREES
5. PROPOSED SCREEN TREES
6. DROUGHT TOLERANT LANDSCAPE

EXISTING PLANT SCHEDULE

TREES

SYMBOL	BOTANICAL NAME	COMMON NAME
	PLATANUS ACERFOLIA	LONDON PLANE
	ERYTHRINA CAFFRA	CORAL
	LOPHOSTEMON CONFERTUS	BRISBANE BOX

NOTE: THE LETTER (E) NEXT TO A TREE SYMBOL INDICATES AN EXISTING TREE TO BE PROTECTED IN PLACE. THE LETTER (R) INDICATES AN EXISTING TREE TO BE REMOVED FROM SITE.

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FIGURE 3.9

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SOURCE: HPA

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5665 Plaza Drive Project Draft Environmental Impact Report

Proposed Project Landscaping Plan

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Based on the preliminary grading plans, approximately 940 cubic yards of material would need to be exported from the project site. Demolition, grading, and building activities would involve the use of standard earthmoving equipment such as excavators, loaders, bulldozers, cranes, and other related equipment.

All construction equipment and materials, including construction employees' personal motor vehicles, would be staged on site or on adjacent property directly east of the project site.

3.6.10 Discretionary Actions and Non-Discretionary Permits/Approvals

The City is the Lead Agency and has principal authority and jurisdiction over all land use entitlements within its incorporated boundaries. The proposed project would require the following discretionary approvals by the City:

- The City Council would certify that the Final EIR addresses the potential environmental effects of the proposed project and identifies appropriate mitigation measures to address any potentially significant effects;

- Specific Plan Amendment to the McDonnell Center Specific Plan to allow light industrial uses in the eastern portion of Planning Area 1, and removal of the maximum developable area requirement while retaining the 1.0:1 floor area ratio (FAR) to maintain consistency with the General Plan; and

- Site plan approval.

Other non-discretionary actions anticipated to be taken by the City and additional agencies at the staff level as part of the proposed project include, but are not limited to, the actions detailed in **Table 3.1**, below.

Table 3.1: Non-Discretionary Permits/Approvals

Agency	Permit/Approval
City of Cypress Community Development Department	Demolition, building, and grading permits
State Water Resources Control Board (SWRCB)	Waste Discharge Identification Number (WDID) for the *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities* (Order No. 2022-0057-DWQ, National Pollutant Discharge Elimination System (NPDES) No. CAS000002)
Santa Ana Regional Water Quality Control Board (RWQCB) (Region 8)	Waste Discharge Identification Number (WDID) for the General Waste Discharge Requirements for Discharge to Surface Waters that Pose an Insignificant (*De Minimis*) Threat to Water Quality (Order No. R8-2020-0006-057 NPDES No. CAG998001)
Orange County Fire Authority (OCFA)	Plan Approval, including emergency access and fire water supply
City of Cypress Community Development Department	Lot line adjustment to move the project site's eastern property line approximately 20 feet east

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4.0 EXISTING SETTING, ENVIRONMENTAL ANALYSIS, IMPACTS, AND MITIGATION MEASURES

OVERVIEW OF ENVIRONMENTAL SETTING

State CEQA Guidelines Section 15125 requires an EIR to include a short description of the physical environmental conditions in the vicinity of a project. This section provides a short description of existing conditions in the proposed project's physical setting. More detailed descriptions of existing conditions focused on each environmental resource are provided in the subsequent sections. A discussion of cumulative impacts is also required. This chapter identifies a list of past, present, and reasonably foreseeable probable future projects that when considered with the proposed project could result in cumulative impacts. More detailed discussions of cumulative impacts focused on each environmental resource are provided in the subsequent sections.

Regional Setting

As discussed in Chapter 3.0, Project Description, of this EIR, the project site is in the southern part of the city of Cypress, in northwestern Orange County, California. The project site is north of the intersection of Plaza Drive and Douglas Drive. As shown on **Figure 3.1: Regional and Project Site Location**, regional access to the project site is provided via SR-22, located approximately 2.2 miles south of the project site, SR-91, located approximately 3.5 miles north of the project site, I-605 or the San Gabriel River Freeway, located approximately 2.2 miles west of the project site, and I-5, located approximately 4.75 miles northeast of project site.

Project Site Setting

Figure 3.2: Aerial Photograph and Surrounding Land Uses, depicts the project site in a local setting. The project site is approximately 8.5 acres and is currently developed with a 150,626-square-foot, five-story office building, a surface parking lot, and ornamental landscaping. As of May 2024, the existing office building was vacant and had no tenants. Historically, the project site was in agricultural production until the existing building was constructed in the late 1980s.

The project site is located in a largely developed portion of the City of Cypress within the McDonnell Specific Plan that consists of numerous office/light industrial uses. The project site is bounded by industrial and office uses to the north, industrial uses to the west, Plaza Drive to the south, and the Goodman Commerce Center Project to the east. The Goodman Commerce Center Project, approved in April 2023, was under construction at the time of the preparation of this EIR.

Pedestrian access to the project site is provided by way of sidewalks along the left side of Douglas Drive/Plaza Drive from Katella Avenue to the current driveway. There are no sidewalks along Plaza Drive east of the project site. Vehicular access to the project site is provided via an existing driveway at 5665 Plaza Drive and a shared driveway at the adjacent property at 5775 Plaza Drive. Local access to the project site is provided via Plaza Drive. The project site is currently served by existing water, sewer, and dry utilities along Plaza Drive.

The project site is located on a single parcel, Assessor Parcel Number (APN) 241-101-25.

CHAPTER FORMAT

This chapter contains eight sections, and each section addresses one environmental topic identified in Appendix G to the State CEQA Guidelines. For each environmental topic issue analyzed, the EIR includes a detailed explanation of the existing conditions, thresholds of significance that will be applied to determine whether the project's impacts are significant or less than significant, analysis of the environmental impacts, and a determination of whether the project would have a significant impact if implemented. A "significant impact" or "significant effect" means "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora fauna, ambient noise, and object of aesthetic significance. An economic or social change by itself shall not be considered to be a significant effect on the environment." (State CEQA Guidelines Section 15382). Each environmental topic section in this chapter includes a discussion of the cumulative effects of the project when considered in combination with other projects, as required by State CEQA Guidelines Section 15130.

Each of the sections is organized into eleven subsections, as follows:

- **Introduction** briefly describes the topics and issues covered in the section.
- **Scoping Process** describes the number and a brief description of comments received from the public during the public scoping period.
- **Methodology** describes the approach and methods employed to complete the environmental analysis for the issue under investigation.
- **Existing Environmental Setting** describes the relevant physical conditions that exist at the time of the issuance of the Notice of Preparation (NOP) that may influence or affect the issue under investigation. This section focuses on physical site characteristics that are relevant to the environmental topic being analyzed.
- **Regulatory Setting** lists and discusses the laws, ordinances, regulations, plans, and policies that relate to the specific environmental topic and how they apply to the proposed project.
- **Thresholds of Significance** sets forth the thresholds that are the basis of the conclusions regarding significance, which are primarily the criteria in Appendix G to the State CEQA Guidelines and the City of Cypress Initial Study/Environmental Checklist, General Plan, or Zoning Code.
- **Project Impacts** describes the potential environmental changes to the existing physical conditions that may occur if the proposed project is implemented. Evidence is presented to show the cause-and-effect relationship between the proposed project and potential changes in the environment. In accordance with State CEQA Guidelines Section 15126.2(a), this EIR is required to "identify and focus on the significant environmental effects" of the proposed project. The magnitude, duration, extent, frequency, and range or other parameters of a potential impact are ascertained to the extent feasible to determine whether impacts may be significant. In accordance with CEQA, potential project impacts, if any, are classified as follows for each of the environmental topics discussed in this EIR.

- **Significant and Unavoidable Impact:** If the proposed project is approved with significant and unavoidable impacts, the decision-making body is required to adopt a statement of overriding considerations pursuant to State CEQA Guidelines Section 15093 explaining why the project benefits outweigh the unavoidable adverse environmental effects caused by those significant and unavoidable environmental impacts.

- **Less Than Significant with Mitigation Incorporated:** This classification refers to potentially significant environmental impacts that can be feasibly mitigated to a level of insignificance. If the proposed project is approved, the decision-making body is required to make findings pursuant to State CEQA Guidelines Section 15091 that significant impacts have been mitigated to the extent feasible through implementation of mitigation measures.

- **Less Than Significant Impact:** Less than significant impacts are environmental impacts that have been identified but are not potentially significant. No mitigation is required for less than significant impacts.

- **No Impact:** A "no impact" determination is made when the proposed project is found to have no environmental impact.

- **Level of Significance Prior to Mitigation** summarizes the potentially significant impacts of the project, if any, prior to mitigation.

- **Regulatory Compliance Measures and Mitigation Measures** describes relevant and applicable laws or regulations that must be adhered to with respect to the construction and/or operation of the proposed project and would reduce or lessen potential impacts related to a particular issue area and identifies project-specific measures that avoid, minimize, rectify, reduce, eliminate, or compensate for a potentially significant impact.

- **Level of Significance after Mitigation** describes the significance of potential impacts after implementation of mitigation measures. Potential significant unavoidable impacts are clearly stated in this section.

- **Cumulative Impacts** refers to potential environmental changes to the existing physical conditions that may occur as a result of project implementation together with all other reasonably foreseeable, planned, and approved future projects in the vicinity of the project site that produce related impacts. State CEQA Guidelines Section 15355 defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Cumulative impacts may result from individually minor but collectively significant projects taking place over a period of time. Projects that have progressed to the stage where CEQA review has been initiated are normally treated as foreseeably probable future projects. For each of the environmental topics considered in this EIR, the geographic scope of the cumulative analysis is defined.

THRESHOLDS OF SIGNIFICANCE

The threshold questions used in this EIR are consistent with Appendix G of the State CEQA Guidelines.

EFFECTS EVALUATED IN THIS EIR

The discussion of potential effects is presented by environmental resource area in this EIR. As part of the Initial Study (Appendix B) prepared for the proposed project, the following environmental issues were considered but no adverse impacts were identified. Furthermore, no new information identifying potentially significant impacts to these resources was presented during the scoping process. As a result, there is no further discussion of the following issues in the EIR:

- Aesthetics
- Agriculture and Forestry Resources
- Biological Resources
- Hazards & Hazardous Materials
- Hydrology/Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems
- Wildfire

CUMULATIVE DEVELOPMENT

In accordance with State CEQA Guidelines Section 15130, cumulative impacts are anticipated impacts of the proposed project along with reasonably foreseeable growth. Reasonably foreseeable growth may be based on either:

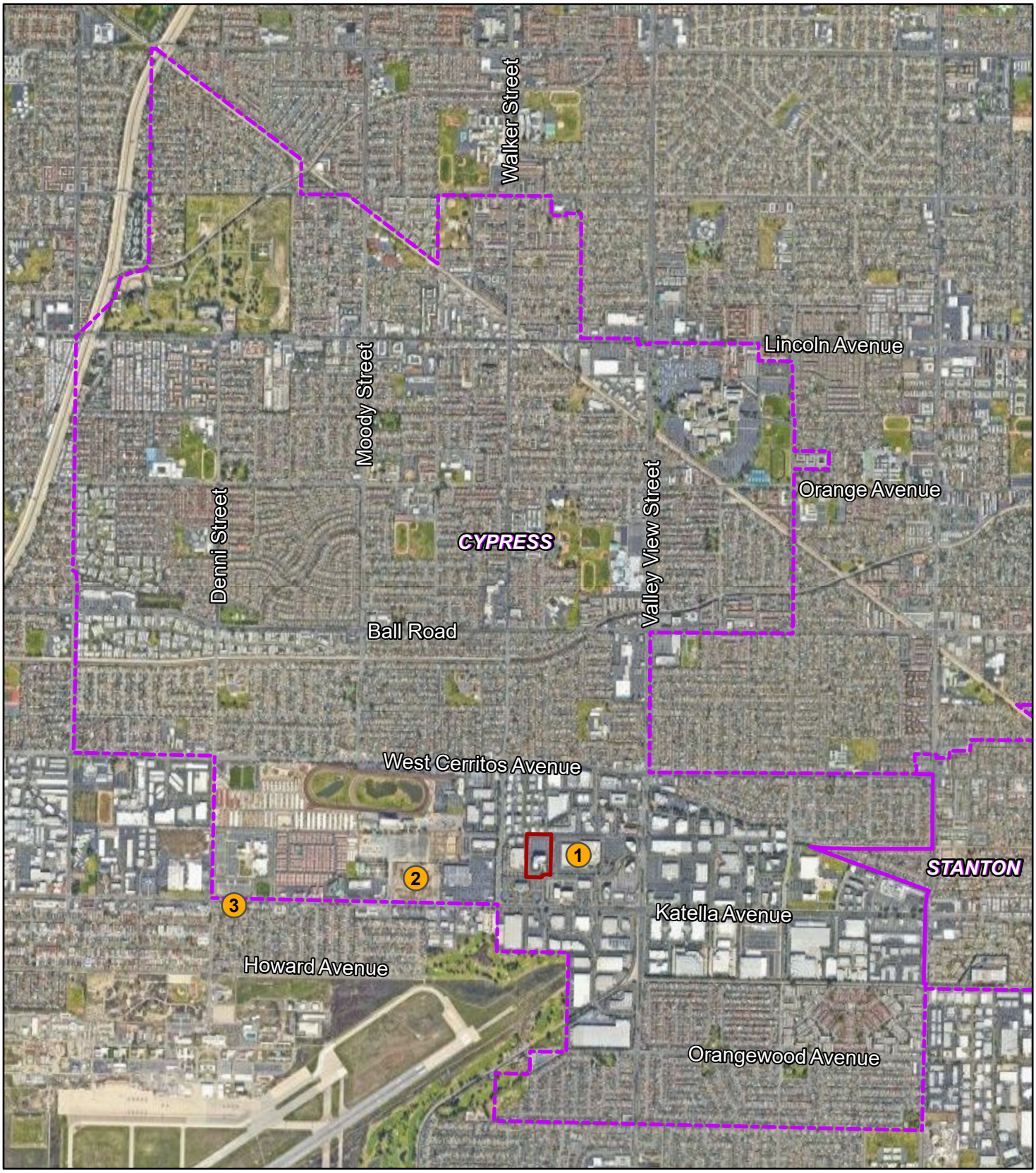
- A list of past, present, and reasonably foreseeable probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or

- A summary of projections contained in the adopted General Plan or related planning document, or in a prior environmental document that has been adopted or certified, and that described or evaluated regional or areawide conditions contributing to the cumulative impact.

Table 4.1, below, presents a list of past, present, and reasonably foreseeable probable future projects (cumulative projects) considered in the evaluation of potential cumulative impacts for this EIR. As stated above, an analysis of the cumulative impacts associated with these related projects and the proposed project is provided in the cumulative impacts discussion under each individual impact category in Chapter 4.0.

For purposes of identifying projects with potential for cumulative impacts, a list of past, present, and reasonably foreseeable probable future projects was developed. As shown in **Table 4.1**, the projects include various land uses, such as residential, commercial, and industrial uses.

The locations of the related projects are shown on **Figure 4.1: Cumulative Projects**. Although some projects on the list have been completed since issuance of the NOP, they remain on the list because they are part of the cumulative analysis for the EIR.



LSA

Project Site
City Boundary
Related Projects

FIGURE 4.1

N

0 1200 2400
FEET

SOURCE: Google Maps (2023)

5665 Plaza Drive Project Draft Environmental Impact Report
Cumulative Projects

J:\CCP2201.04\GIS\Pro\Cypress 5665 Plaza Drive Project\Cypress 5665 Plaza Drive Project.aprx (5/28/2024)

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Table 4.1: Summary of Cumulative Projects

Project No.	Project Name	Location	Status	Project Description
City of Cypress				
1	Goodman Commerce Center[7]	5757 Plaza Drive	Under construction as of 2024	204,909-square-foot office/ warehouse building 185,359-square-foot office/ warehouse building
2	Cypress Town Center	10727 Champions Lane	Under construction as of 2024	Multifamily apartments 135 du (condominiums and townhomes)
3	Cypress City Center (The Square)	Northwest corner of Winners Circle and Katella Avenue	Under construction as of 2024	251 du apartments 20,800-square-foot retail 120-room hotel 10-screen multiplex movie theater

du = dwelling unit
sf = square foot/feet

It is noted that some of the cumulative projects may not be completed in 2025 (the proposed project's anticipated buildout year), may never be built, or may be approved and built at reduced densities. However, to provide a conservative forecast, the future baseline forecast assumes that all of the related projects will be fully built out by 2025.

The discussion of cumulative impacts "should be guided by the standards of practicality and reasonableness" (*Environmental Protection Info. Center v. Department of Forestry & Fire Protection* (2008) 44 Cal.4th 459, 524). A proposal that has not crystallized to the point that it would be reasonable and practical to evaluate its cumulative impacts need not be treated as a probable future project (*City of Maywood v. Los Angeles Unified School District* (2012) 208 Cal.App.4th 362, 397).

Rather, a potential future project qualifies for inclusion in an analysis of cumulative impacts only to the extent the future project is "both probable and sufficiently certain to allow for meaningful cumulative impact analysis" (*Id.* at 398; see *City of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal.App.4th 889, 902 [when "review[ing] the agency's decision to include information in the cumulative impacts analysis[,] ... [w]e determine whether inclusion was reasonable and practical"]).

[7] The Goodman Commerce Center project, even though it has the same project proponent as the proposed project, is an independent, cumulative project. The proposed project is on a separate parcel and is not a reasonably foreseeable consequence of the Goodman Commerce Center project. (*McCann v. City of San Diego* (2021) 70 Cal.App.5th 51, 85 [city could separately consider different utility undergrounding projects because each project was separately approved and independently functional of the other projects]; *Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1222 [no piecemealing because project was not a "reasonably foreseeable consequence" of another project].) The Goodman Commerce Center project was designed to function as an independent development, with all required public and private improvements (such as internal accessways and driveways). It did not necessitate or compel the proposed project. (*Aptos Council v. County of Santa Cruz* (2017) 10 Cal.App.5th 266, 280 ["when each action has independent utility and does not subsume or necessitate each other, the actions may properly undergo separate environmental review"].) The proposed project can likewise function independently and proposes all necessary on-site and off-site improvements needed to ensure proper operation of the proposed 191,394-square-foot light industrial building.

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4.1 AIR QUALITY

This section describes the potential air quality impacts for the proposed 5665 Plaza Drive Project (proposed project) using methodologies and assumptions recommended in the air quality impact assessment guidelines of the South Coast Air Quality Management District (SCAQMD) *California Environmental Quality Act (CEQA) Air Quality Handbook,*[8] and associated updates. In keeping with these guidelines, this section of the Draft EIR describes the regulatory setting, existing air quality in the proposed project area, and describes short-term impacts during construction, long-term impacts associated with operations, and potential impacts to human health. The air quality modeling data used for this analysis is provided in **Appendix C** to this Draft EIR.

4.1.1 Scoping Process

The City received 3 comment letters during the public review period for the NOP. For copies of the NOP comment letters, refer to **Appendix A** of this EIR. Two comment letters included comments related to Air Quality.

The letter from The City of Los Alamitos received on June 5, 2024, suggested that the Draft EIR should evaluate the proposed project's impact on air quality from the proposed change in land use.

The Letter from Warland Investments Company and Affiliated Entities received on June 5, 2024, suggest that the proposed project has a foreseeable potential use as a logistics center, stating that logistics centers contribute to excessive air pollution when compared to typical warehouse projects. Additionally, in a previous letter dated March 7, 2024, which was included as an attachment in the June 5, 2024, letter, Warland states their concerns regarding the short and long-term impacts to air quality in surrounding areas due to the proposed cumulative redevelopment of 5665 Plaza Drive. The Letter also stated that the proposed project does not consider the air quality impacts of refrigerated trucks accessing the project site and also fails to evaluate off-site air quality impacts.

4.1.2 Regulatory Setting

The applicable federal, State, regional, and local regulatory framework is discussed below.

4.1.2.1 Federal Regulations

Clean Air Act (CAA) (42 U.S.C. §§ 7401-7671q), was largely enacted in 1970 and subsequently amended in 1977, and 1990. The CAA establishes federal air quality standards for six pollutants, ("criteria pollutants"). These criteria pollutants include carbon monoxide (CO), ozone (O_3), particulate matter 10 microns in diameter and less (PM_{10}), particulate matter 2.5 microns and less ($PM_{2.5}$), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead (Pb). The federal air quality standards are known as the National Ambient Air Quality Standards (NAAQS). The CAA charges the U.S. Environmental Protection Agency (USEPA) with setting and enforcing the NAAQS for criteria pollutants. The NAAQS also include dates by which compliance must be achieved.

[8] South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook.* Website: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook- (1993), (accessed May 13, 2024).

Areas of the United States that have met the NAAQS are described as being in "attainment." Areas that have not achieved the NAAQS are described as being in "nonattainment." Areas that were previously in nonattainment but have since achieved the NAAQS are described as being in "maintenance." The CAA requires each state that has not met the NAAQS to prepare an air quality control plan referred to as a State Implementation Plan (SIP) demonstrating how the State will achieve the NAAQS. SIPs are periodically modified to reflect the latest emissions inventories, planning documents, and rules and regulations of their subject air basins as reported by their jurisdictional agencies. The USEPA has responsibility to review every State's SIP to determine conformity with the mandates of the CAA and determine if implementation would achieve air quality goals. If the USEPA determines a SIP to be inadequate, a Federal Implementation Plan may be prepared for the nonattainment area, which imposes additional control measures. Failure to submit an approvable SIP or to implement the plan within the mandated timeframe may result in sanctions on transportation funding and stationary air pollution sources in the air basin.

The CAA Amendments of 1990 identified specific emission reduction goals for areas not achieving the NAAQS. The amendments included additional requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution, as well as requirements for States to demonstrate reasonable progress towards meeting the NAAQS and sanctions for failure to meet certain milestones in achieving the NAAQS.

The USEPA is also required to develop National Emission Standards for Hazardous Air Pollutants (HAPs), which are defined as pollutants which may reasonably be anticipated to result in increased deaths or serious illness, and which are not already regulated. An independent science advisory board reviews the health and exposure analyses conducted by the USEPA on suspected hazardous pollutants prior to regulatory development.

4.1.2.2 State Regulations

California Clean Air Act (CCAA)(Assembly Bill 2595). Enacted in 1988, the CCAA requires all air quality districts in the State develop air quality plans and authorizes air quality districts to implement transportation control measures. The CCAA charges the California Air Resources Board (CARB) with implementation of the CCAA, regulating emissions from consumer products and motor vehicles, and responding to the requirements of the federal CAA. The CCAA mandates achievement of emissions reductions to the maximum degree possible to achieve and maintain the California Ambient Air Quality Standards (CAAQS). The CAAQS set standards for the same criteria pollutants for which NAAQS have been established as well as sulfates (SO_4^{2-}), visibility reducing particles, hydrogen sulfide (H_2S), and vinyl chloride (C_2H_3Cl). **Table 4.1.1** presents the NAAQS and CAAQS.

The project site is located in the South Coast Air Basin (Basin) under the authority of the SCAQMD. The CCAA endows local air quality management districts with authority to regulate air emissions from stationary sources, including commercial and industrial facilities, and mandates that air quality districts focus particular attention on reducing emissions from transportation and area-wide emission sources. Each district with areas in nonattainment are required to adopt air quality management plans (AQMPs) to achieve a 5 percent annual reduction, averaged over consecutive 3-year periods, in district-wide emissions of each nonattainment pollutant or its precursors. An AQMP shows how a district would reduce emissions to achieve air quality standards. Generally, the State standards for these pollutants are more stringent than the national standards.

Table 4.1.1: Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards [1]		Federal Standards [2]		
		Concentration [3]	Method [4]	Primary [3,5]	Secondary [3,6]	Method [7]
Ozone (O_3)[8]	1-Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	–	Same as Primary Standard	Ultraviolet Photometry
	8-Hour	0.07 ppm (137 µg/m^3)		0.070 ppm (137 µg/m^3)		
Respirable Particulate Matter (PM_{10})[9]	24-Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		–		
Fine Particulate Matter ($PM_{2.5}$)[9]	24-Hour	–		35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	9.0 µg/m^3	15.0 µg/m3	
Carbon Monoxide (CO)	8-Hour	9.0 ppm (10 mg/m^3)	Non-Dispersive Infrared Photometry (NDIR)	9 ppm (10 mg/m^3)	–	Non-Dispersive Infrared Photometry (NDIR)
	1-Hour	20 ppm (23 mg/m^3)		35 ppm (40 mg/m^3)		
	8-Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		–	–	
Nitrogen Dioxide (NO_2)[10]	Annual Arithmetic Mean	0.03 ppm (57 µg/m^3)	Gas Phase Chemi-luminescence	53 ppb (100 µg/m^3)	Same as Primary Standard	Gas Phase Chemi-luminescence
	1-Hour	0.18 ppm (339 µg/m^3)		100 ppb (188 µg/m^3)	–	
Lead (Pb)[12,13]	30-Day Average	1.5 µg/m^3	Atomic Absorption	–	–	High-Volume Sampler and Atomic Absorption
	Calendar Quarter	–		1.5 µg/m^3 (for certain areas)[l]	Same as Primary Standard	
	Rolling 3-Month Average [i]	–		0.15 µg/m^3		
Sulfur Dioxide (SO_2)[11]	24-Hour	0.04 ppm (105 µg/m3)	Ultraviolet Fluorescence	0.14 ppm (for certain areas)	–	Ultraviolet Fluorescence; Spectro-photometry (Pararosaniline Method)
	3-Hour	–		–	0.5 ppm (1300 µg/m^3)	
	1-Hour	0.25 ppm (655 µg/m^3)		75 ppb (196 µg/m^3)[11]	–	
	Annual Arithmetic Mean	–		0.030 ppm (for certain areas)[11]	–	
Visibility-Reducing Particles [12]	8-Hour	See footnote [14]	Beta Attenuation and Transmittance through Filter Tape	No Federal Standards		
Sulfates	24-Hour	25 µg/m^3	Ion Chromatography			
Hydrogen Sulfide	1-Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride [10]	24-Hour	0.01 ppm (26 µg/m^3)	Gas Chromatography			

Source: Ambient Air Quality Standards (California Air Resources Board 2024).
Notes on following page.

[1] California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1- and 24-hour), nitrogen dioxide, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[2] National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact USEPA for further clarification and current national policies.

[3] Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[4] Any equivalent measurement method which can be shown to the satisfaction of the CARB to give equivalent results at or near the level of the air quality standard may be used.

[5] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

[6] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[7] Reference method as described by the USEPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the USEPA.

[8] On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[9] On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 µg/m^3 to 12.0 µg/m^3. In February 2024, the national annual $PM_{2.5}$ primary standard was lowered from 12 µg/m^3 to 9.0 µg/m^3; the secondary annual standard remained at 15 µg/m^3. The existing national 24- hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m^3, as was the annual secondary standard of 15 µg/m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

[10] To attain the 1-hour national standard, the three-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

[11] On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the three-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.
Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

[12] The CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[13] The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 µg/m^3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

[14] In 1989, the CARB converted both the general Statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the Statewide and Lake Tahoe Air Basin standards, respectively.

°C = degrees Celsius
µg/m^3 = micrograms per cubic meter
CARB = California Air Resources Board
mg/m^3 = milligrams per cubic meter
ppb = parts per billion
ppm = parts per million
USEPA = United States Environmental Protection Agency

4.1.2.3 Criteria Air Pollutants

As discussed above, both State and federal governments have established health-based ambient air quality standards for criteria air pollutants. Criteria pollutants are defined as those pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health.

As both the USEPA and the CARB have established ambient air quality standards for CO, O_3, NO_2, SO_2, Pb, and suspended particulate matter. In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. These ambient air quality standards are levels of contaminants that avoid specific adverse health effects associated with each pollutant.

Federal standards include both primary and secondary standards. Primary standards establish limits to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility, and damage to animals, crops, vegetation, and buildings.[9] The criteria pollutants are described in greater detail below.

Ozone. O_3 is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving ROG and NO_x. The main sources of ROG and NO_x, often referred to as ozone precursors, are combustion processes (including combustion in motor vehicle engines) and the evaporation of solvents, paints, and fuels. Automobiles are typically the largest source of ozone precursors. Ozone is referred to as a regional air pollutant because its precursors are transported and diffused by wind concurrently with ozone production through the photochemical reaction process. Ozone causes eye irritation, airway constriction, and shortness of breath and can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema.

Particulate Matter. Particulate matter is a class of air pollutants that consists of heterogeneous solid and liquid airborne particles from humanmade and natural sources. Particulate matter is categorized in two size ranges: PM_{10}, for particles less than 10 microns in diameter, and $PM_{2.5}$, for particles less than 2.5 microns in diameter. Motor vehicles are the primary generators of particulates, through tailpipe emissions as well as brake pad and tire wear, and entrained road dust. Wood burning in fireplaces and stoves, industrial facilities, and ground-disturbing activities such as construction are other sources of such fine particulates. These fine particulates are small enough to be inhaled into the deepest parts of the human lung and can cause adverse health effects. According to CARB, studies in the United States and elsewhere have demonstrated a strong link between elevated particulate levels and premature deaths, hospital admissions, emergency room visits, and asthma attacks, and studies of children's health in California have demonstrated that particle pollution may significantly reduce lung function growth in children.[10] Statewide attainment of

[9] United States Environmental Protection Agency (USEPA). 2017. Criteria Air Pollutants. October. Website: www.epa.gov/criteria-air-pollutants (accessed May 13, 2024).

[10] California Air Resources Board (CARB). 2020. *Inhalable Particulate Matter and Health ($PM_{2.5}$ and PM_{10})*. Website: ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health (accessed May 13, 2024).

particulate matter standards could reduce premature deaths, hospital admissions for cardiovascular and respiratory disease, asthma-related emergency room visits, and episodes of respiratory illness in California.

Carbon Monoxide. CO is an odorless, colorless gas usually formed as the result of the incomplete combustion of fuels. The single largest source of CO is motor vehicles. CO transport is limited – it disperses with distance from the source under normal meteorological conditions. However, under certain extreme meteorological conditions, CO concentrations near congested roadways or intersections may reach unhealthful levels that adversely affect local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients). Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. Exposure to high concentrations of CO reduces the oxygen-carrying capacity of the blood and can cause headaches, nausea, dizziness, and fatigue, impair central nervous system function, and induce angina (chest pain) in persons with serious heart disease. Extremely high levels of CO, such as those generated when a vehicle is running in an unventilated garage, can be fatal.

Nitrogen Dioxide. NO_2 is a reddish-brown gas that is a byproduct of combustion processes. Automobiles and industrial operations are the main sources of NO_2. Aside from its contribution to ozone formation, NO_2 also contributes to other pollution problems, including a high concentration of fine particulate matter, poor visibility, and acid deposition. NO_2 may be visible as a coloring component on high pollution days, especially in conjunction with high ozone levels. NO2 decreases lung function and may reduce resistance to infection.

Sulfur Dioxide. SO_2 is a colorless, acidic gas with a strong odor. It is produced by the combustion of sulfur-containing fuels such as oil, coal, and diesel. SO_2 has the potential to damage materials and can cause health effects at high concentrations. It can irritate lung tissue and increase the risk of acute and chronic respiratory disease. SO_2 also reduces visibility and the level of sunlight at the ground surface.

Lead. Lead is a metal found naturally in the environment as well as in manufactured products. The major sources of lead emissions have historically been mobile and industrial sources. As a result of the phase-out of leaded gasoline, metal processing is currently the primary source of lead emissions. The highest levels of lead in air are generally found near lead smelters. Other stationary sources are waste incinerators, utilities, and lead-acid battery factories. Twenty years ago, mobile sources were the main contributor to ambient lead concentrations in the air. In the early 1970s, the USEPA established national regulations to gradually reduce the lead content in gasoline. In 1975, unleaded gasoline was introduced for motor vehicles equipped with catalytic converters. The USEPA banned the use of leaded gasoline in highway vehicles in December 1995. As a result of USEPA regulatory efforts to remove lead from gasoline, emissions of lead from the transportation sector and levels of lead in the air decreased dramatically.

Volatile Organic Compounds. VOCs (also known as ROGs) form from the combustion of fuels and the evaporation of organic solvents. VOCs are not defined as criteria pollutants; however, because VOCs accumulate in the atmosphere more quickly during the winter, when sunlight is limited and photochemical reactions are slower, they are a prime component of the photochemical smog reaction. There are no attainment designations for VOCs.

Toxic Air Contaminants. In addition to the criteria pollutants discussed above, toxic air contaminants (TACs) are another group of pollutants of concern. Some examples of TACs include benzene, butadiene, formaldehyde, and hydrogen sulfide. Potential human health effects of TACs include birth defects, neurological damage, cancer, and death. There are hundreds of different types of TACs with varying degrees of toxicity. Individual TACs vary greatly in the health risk they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another. TACs do not have ambient air quality standards, but are regulated by the USEPA, the CARB, and the SCAQMD. In 1998, the CARB identified particulate matter from diesel-fueled engines as a TAC. The CARB has completed a risk management process that identified potential cancer risks for a range of activities and land uses that are characterized by use of diesel-fueled engines.[11] High volume freeways, stationary diesel engines, and facilities attracting heavy and constant diesel vehicle traffic (distribution centers, truck stops) were identified as posing the highest risk to adjacent receptors. Other facilities associated with increased risk include warehouse distribution centers, large retail or high-volume transit centers, and schools with a high volume of bus traffic, which generate diesel engine trips. Health risks from TACs are a function of both concentration and duration of exposure.

Unlike TACs emitted from heavy industrial and other stationary sources noted above, most diesel particulate matter (DPM) is emitted from mobile sources—primarily "off-road" sources such as construction and mining equipment, agricultural equipment, and truck-mounted refrigeration units, as well as trucks and buses traveling on freeways and local roadways. DPM is the TAC most associated with warehousing uses.

The CARB Diesel Risk Reduction Plan is intended to substantially reduce diesel particulate matter emissions and associated health risks through introduction of ultra-low-sulfur diesel fuel—a step already implemented—and cleaner-burning diesel engines.[12] The technology for reducing diesel particulate matter emissions from heavy-duty trucks is well established, and both State and federal agencies are moving aggressively to regulate engines and emission control systems to reduce and remediate diesel emissions.

Table 4.1.2 describes the sources and effects of criteria air pollutants.

The Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588)(Health & Safety Code § 44300, *et seq*.; Cal. Code Regs § 93300, *et seq.*) Under AB 2588, stationary sources of air pollutants are required to report the types and quantities of certain substances that their facilities routinely released into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, identify facilities having localized impacts, determine health risks, and notify nearby residents of significant risks.

11 CARB. 2000a. *Fact Sheet – California's Plan to Reduce Diesel Particulate Matter Emissions*. October. Website: www.arb.ca.gov/diesel/factsheets/rrpfactsheet.pdf (accessed May 13, 2024).

12 CARB. 2000b. *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles*. October. Prepared by the Stationary Source Division and Mobile Source Control Division. Website: www.arb.ca.gov/diesel/documents/rrpFinal.pdf (accessed May 13, 2024).

Table 4.1.2: Sources and Health Effects of Air Pollutants

Pollutants	Sources	Primary Effects
Ozone (O_3)	• Precursor sources:[1] motor vehicles, industrial emissions, and consumer products.	• Respiratory symptoms. • Worsening of lung disease leading to premature death. • Damage to lung tissue. • Crop, forest, and ecosystem damage. • Damage to a variety of materials, including rubber, plastics, fabrics, paints, and metals.
Particulate Matter Less than 2.5 Microns in Diameter ($PM_{2.5}$)	• Cars and trucks (especially diesels). • Fireplaces, woodstoves. • Windblown dust from roadways, agriculture, and construction.	• Premature death. • Hospitalization for worsening of cardiovascular disease. • Hospitalization for respiratory disease. • Asthma-related emergency room visits. • Increased symptoms, increased inhaler usage.
Particulate Matter Less than 10 Microns in Diameter (PM_{10})	• Cars and trucks (especially diesels). • Fireplaces, woodstoves. • Windblown dust from roadways, agriculture, and construction.	• Premature death and hospitalization, primarily for worsening of respiratory disease. • Reduced visibility and material soiling.
Nitrogen Oxides (NO_X)	• Any source that burns fuels such as cars, trucks, construction and farming equipment, and residential heaters and stoves.	• Lung irritation. • Enhanced allergic responses.
Carbon Monoxide (CO)	• Any source that burns fuels such as cars, trucks, construction and farming equipment, and residential heaters and stoves.	• Chest pain in patients with heart disease. • Headache. • Light-headedness. • Reduced mental alertness.
Sulfur Oxides (SO_X)	• Combustion of sulfur-containing fossil fuels. • Smelting of sulfur-bearing metal ores. • Industrial processes.	• Worsening of asthma: increased symptoms, increased medication usage, and emergency room visits.
Lead (Pb)	• Contaminated soil.	• Impaired mental functioning in children. • Learning disabilities in children. • Brain and kidney damage.
Toxic Air Contaminants (TACs)	• Cars and trucks (especially diesels). • Industrial sources, such as chrome platers. • Neighborhood businesses, such as dry cleaners and service stations. • Building materials and products.	• Cancer. • Reproductive and developmental effects. • Neurological effects.

Source: California Air Resources Board (2018).

[1] Ozone is not generated directly by these sources. Rather, chemicals emitted by these precursor sources react with sunlight to form ozone in the atmosphere.

Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRUs) and TRU Generator Sets, and Facilities where TRUs Operate (TRU ATCM). CARB adopted the TRU ATCM in 2004 (and amended it in 2010 and 2011) to reduce diesel PM emissions and resulting health risk from diesel-powered TRUs. On February 24, 2022, CARB adopted amendments to the TRU ATCM (2022 Amendments) to achieve additional emission and health risk reductions from diesel-powered TRUs and increase the use of zero-emission (ZE) technology in the off-road sector. The 2022 Amendments will help meet the State's multiple risk reduction, air quality, and climate goals, as well

as the directive of Executive Order (EO) N-79-20, which set a goal for 100 percent ZE off-road vehicles and equipment in the State by 2035.

The California Air Resources Board Handbook. CARB has developed an Air Quality and Land Use Handbook[13] (CARB Handbook), which is intended to serve as a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. According to the CARB Handbook, air pollution studies have shown an association between proximity to high traffic roadways and respiratory and other non-cancer health effects. Other studies have shown that diesel exhaust and other cancer-causing chemicals emitted from cars and trucks are responsible for much of the overall cancer risk from airborne toxics in California. The CARB Handbook recommends that county and city planning agencies strongly consider proximity to these sources when finding new locations for "sensitive" land uses such as homes, medical facilities, daycare centers, schools, and playgrounds.

Land use designations with air pollution sources of concern include freeways, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and large gasoline service stations. Key recommendations in the CARB Handbook include taking steps to avoid siting new, sensitive land uses:

- Within 500 feet of a freeway, urban roads with 100,000 vehicles/day or rural roads with 50,000 vehicles/day;
- Within 1,000 feet of a major service and maintenance rail yard;
- Immediately downwind of ports (in the most heavily impacted zones) and petroleum refineries;
- Within 300 feet of any dry-cleaning operation (for operations with two or more machines, provide 500 feet); and
- Within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater).

The CARB Handbook specifically states that its recommendations are advisory and acknowledges land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality-of-life issues.

The recommendations are generalized and do not consider site-specific meteorology, freeway truck percentages, or other factors that influence risk for a particular project site. The purpose of this guidance is to further examine project sites for actual health risk associated with the location of new sensitive land uses.

[13] CARB. 2005. *Air Quality and Land Use Handbook: A Community Health Perspective* (CARB Handbook). April.

4.1.2.4 Regional Regulations

South Coast Air Quality Management District Rules. The SCAQMD has jurisdiction over most air quality matters in the Basin. This area includes all of Orange County, Los Angeles County except for the Antelope Valley, the non-desert portion of western San Bernardino County, and the western and Coachella Valley portions of Riverside County. The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin and is tasked with implementing certain programs and regulations required by the CAA and the CCAA. The SCAQMD prepares plans to attain the CAAQS and NAAQS. SCAQMD is directly responsible for reducing emissions from stationary (area and point) sources. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures though educational programs or fines, when necessary. The following regulations and rules promulgated by SCAQMD are applicable to the proposed project:

- **Regulation IV - Prohibitions:** This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air pollutant emissions, fuel contaminants, start-up/shutdown exemptions, and breakdown events.

    - **Rule 402 - Nuisance:** This rule restricts the discharge of any contaminant in quantities that cause or have a natural ability to cause injury, damage, nuisance, or annoyance to businesses, property, or the public. Future development projects that are implemented in accordance with the proposed zoning and updated land use designations will be required to comply with Rule 402.

    - **Rule 403 - Fugitive Dust:** This rule requires the prevention, reduction, or mitigation fugitive dust emissions from a project site. Rule 403 restricts visible fugitive dust to a project property line, restricts the net PM_{10} emissions to less than 50 micrograms per cubic meter ($\mu g/m^3$) and restricts the tracking out of bulk materials onto public roads. Additionally, Rule 403 requires an applicant to use one or more of the best available control measures (identified in the tables within the rule). Control measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers, and/or ceasing all activities. Finally, Rule 403 requires that a contingency plan be prepared if so determined by the USEPA. In addition, SCAQMD Rule 403(e), Additional Requirements for Large Operations, includes requirements to provide Large Operation Notification Form 403 N, appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control training class in the South Coast Air Basin. Future development projects that are implemented in accordance with the proposed zoning and updated land use designations will be required to comply with Rule 403.

- **Regulation XI - Source Specific Standards:** Regulation XI sets emissions standards for different sources.

    - **Rule 1113 - Architectural Coatings:** This rule limits the amount of VOCs from architectural coatings and solvents, which lowers the emissions of odorous compounds. Future

development projects that are implemented in accordance with the proposed zoning and updated land use designations will be required to comply with Rule 1113.

The SCAQMD is responsible for demonstrating regional compliance with ambient air quality standards but has limited direct involvement in reducing emissions from fugitive, mobile, and natural sources. To that end, the SCAQMD works cooperatively with CARB, the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and other federal and State government agencies. It has responded to this requirement by preparing a series of AQMPs to meet the CAAQS and NAAQS. SCAQMD and SCAG are responsible for formulating and implementing the AQMP for the Basin. The main purpose of an AQMP is to bring the area into compliance with federal and State air quality standards. Every several years, SCAQMD prepares a new AQMP, updating the previous plan and the 20-year horizon.[14] The Final 2022 Air Quality Management Plan is the currently adopted AQMP. Key elements of the Final 2022 AQMP include:

- Calculating and taking credit for co-benefits from other planning efforts (e.g., climate, energy, and transportation)
- A strategy with fair-share emission reductions at the federal, State, and local levels
- Investment in strategies and technologies meeting multiple air quality objectives
- Seeking new partnerships and significant funding for incentives to accelerate deployment of zero-emission and near-zero emission technologies
- Enhanced socioeconomic assessment, including an expanded environmental justice analysis
- Attainment of the 24-hour $PM_{2.5}$ standard in 2019 with no additional measures
- Attainment of the annual $PM_{2.5}$ standard by 2025 with implementation of a portion of the O_3 strategy
- Attainment of the 1-hour O_3 standard by 2022 with no reliance on “black box” future technology (CAA Section 182(e)(5) measures)

The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low nitrogen oxides (NO_x) technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard.

[14] South Coast Air Quality Management District (SCAQMD). 2016a. *Final 2016 Air Quality Management Plan*. March.

Southern California Association of Governments. SCAG is a council of governments for Los Angeles, Orange, Riverside, San Bernardino, Imperial, and Ventura counties. It is a regional planning agency and serves as a forum for regional issues relating to transportation, the economy and community development, and the environment. SCAG is the federally designated Metropolitan Planning Organization (MPO) for the majority of the Southern California region and is the largest MPO in the nation. With regard to air quality planning, SCAG prepares the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP), which address regional development and growth forecasts and form the basis for the land use and transportation control portions of the AQMP and are used in the preparation of the air quality forecasts and consistency analysis included in the AQMP. The RTP, RTIP, and AQMP are based on projections originating within local jurisdictions.

Although SCAG is not an air quality management agency, it is responsible for developing transportation, land use, and energy conservation measures that affect air quality. SCAG's Regional Comprehensive Plan (RCP) provides growth forecasts that are used in the development of air quality-related land use and transportation control strategies by the SCAQMD. The RCP is a framework for decision-making for local governments, assisting them in meeting federal and State mandates for growth management, mobility, and environmental standards, while maintaining consistency with regional goals regarding growth and changes. Policies within the RCP include consideration of air quality, land use, transportation, and economic relationships by all levels of government.

SCAG adopted the 2024–2050 RTP/Sustainable Communities Strategy (SCS) (collectively called Connect SoCal) on April 4, 2024. Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. Connect SoCal is an important planning document for the region, allowing project sponsors to qualify for federal funding and takes into account operations and maintenance costs, to ensure reliability, longevity, and cost effectiveness.

Using growth forecasts and economic trends, the RTP provides a vision for transportation throughout the region for the next 20 years. It considers the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future, identifying regional transportation strategies to address mobility needs. The SCS is a required element of the RTP, which integrates land use and transportation strategies to achieve CARB emissions reduction targets. The inclusion of the SCS is required by SB 375, which was enacted to reduce GHG emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. The RTP/SCS would successfully achieve and exceed the GHG emission-reduction targets set by the CARB by achieving an 8 percent reduction by 2020, an 18 percent reduction by 2035, and a 21 percent reduction by 2040 compared to the 2005 level on a per capita basis. This RTP/SCS also meets criteria pollutant emission budgets set by the USEPA.

4.1.2.5 Local Regulations

City of Cypress General Plan. The Air Quality Element of the City's General Plan is intended to protect public health and welfare by implementing measures that allow the Basin to attain federal and State air quality standards. To achieve this goal, the Air Quality Element sets forth a number of programs to reduce current pollutant emissions and to require new development to include

measures to comply with air quality standards. The Air Quality Element identifies goals and policies to reduce the generation of pollutants. It also recognizes that air quality is a regional issue affecting the entire Basin. Thus, most of the goals and policies in the Air Quality Element apply generally to the City but not necessarily to individual development projects.

4.1.3 Existing Environmental Setting

The City is part of the South Coast Air Basin and is under the jurisdiction of SCAQMD. Background information about air pollutants and health effects, climate, meteorological conditions, and regional air quality conditions in the Basin and local air quality conditions in the vicinity of the project site are provided below.

4.1.3.1 South Coast Air Basin

The SCAQMD was created by the 1977 Lewis-Presley Air Quality Management Act, which merged four county air pollution control bodies into one regional district. Under the Act, the SCAQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and State air quality standards. As previously stated, the project site is located within the Basin, a 6,745-square-mile subregion of the SCAQMD, which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The Basin is bounded by the San Gabriel, San Bernardino, and San Jacinto mountains to the north and east and by the Pacific Ocean to the south and west.

Air Pollutants and Health Effects. As previously discussed, both NAAQS and CAAQS have been established for six criteria air pollutants: CO, O_3, NO_2, SO_2, Pb, PM_{10}, and $PM_{2.5}$. In addition, the State has set standards for SO_4^{2-}, H_2S, C_2H_3Cl, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. Two criteria pollutants, O_3 and NO_2, are considered regional pollutants because they (or their precursors) affect air quality on a regional scale. Pollutants such as CO, SO_2, and Pb are considered local pollutants that tend to accumulate in the air locally.

The primary pollutants of concern in the City are O_3, CO, and $PM_{2.5}$. Significance thresholds established by an air quality district are used to manage total regional and local emissions within an air basin based on the air basin's attainment status for criteria pollutants. These emission thresholds were established for individual development projects that would contribute to regional and local emissions and could adversely affect or delay the air basin's projected attainment target goals for nonattainment criteria pollutants.

Because of the conservative nature of the significance thresholds and the basin-wide context of individual development project emissions, there is no direct correlation between a single project and localized air quality-related health effects. One individual project that generates emissions exceeding a threshold does not necessarily result in adverse health effects for residents in the project vicinity. This condition is especially true when the criteria pollutants exceeding thresholds are those with regional effects, such as ozone precursors like nitrogen oxides (NO_X) and ROGs.

Further, by its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to by itself result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a

project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant. In developing thresholds of significance for air pollutants, the air quality districts have considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

Occupants of facilities such as schools, daycare centers, parks and playgrounds, hospitals, and nursing and convalescent homes are considered to be more sensitive than the general public to air pollutants because these population groups have increased susceptibility to respiratory disease. Persons engaged in strenuous work or exercise also have increased sensitivity to poor air quality. Residential areas are considered more sensitive to air quality conditions, compared to commercial and industrial areas, because people generally spend longer periods of time at their residences, with greater associated exposure to ambient air quality conditions. Recreational uses are also considered sensitive compared to commercial and industrial uses due to greater exposure to ambient air quality conditions associated with exercise. These populations are referred to as sensitive receptors.

4.1.3.2 Existing Climate and Air Quality

The following provides a discussion of the local and regional air quality and climate in the City of Cypress.

Climate/Meteorology. Air quality in the City of Cypress is not only affected by various emission sources (e.g., mobile and industry), but also by atmospheric conditions (e.g., wind speed, wind direction, temperature, and rainfall). The combination of topography, low mixing height, abundant sunshine, and emissions from the second-largest urban area in the United States gives the Basin some of the worst air pollution in the nation.

The annual average temperature varies little throughout the Basin, ranging from the low to middle 60s degrees Fahrenheit (°F). With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. The climatological station closest to the City is the Anaheim station.[15] The monthly average maximum temperature recorded at this station ranged from 69.7°F in December to 87.1°F in August, with an annual average maximum of 77.4°F. The monthly average minimum temperature recorded at this station ranged from 46.9°F in December to 64.5°F in August, with an annual average minimum of 55.4°F. These levels are representative of the City.

The majority of annual rainfall in the Basin occurs between November and April. Summer rainfall is minimal and is generally limited to scattered thundershowers in coastal regions and slightly heavier showers in the eastern portion of the Basin and along the coastal side of the mountains. Average monthly rainfall at the Anaheim station varied from 0.01 inch in August to 3.47 inches in February, with an annual total of 14.09 inches. Patterns in monthly and yearly rainfall totals are unpredictable due to fluctuations in the weather.

[15] Western Regional Climate Center. Recent Climate in the West. Website: http://www.wrcc.dri.edu, (accessed May 13, 2024).

The Basin experiences a persistent temperature inversion (increasing temperature with increasing altitude) as a result of the Pacific high. This inversion limits the vertical dispersion of air contaminants, holding them relatively near the ground. As the sun warms the ground and the lower air layer, the temperature of the lower air layer approaches the temperature of the base of the inversion (upper) layer until the inversion layer finally breaks, allowing vertical mixing with the lower layer. This phenomenon is observed in mid-afternoon to late afternoon on hot summer days when the air appears to clear up suddenly. Winter inversions frequently break by midmorning.

Winds in the City blow predominantly from the south-southwest, with relatively low velocities. Wind speeds in the City average about 5 miles per hour (mph). Summer wind speeds average slightly higher than winter wind speeds. Low average wind speeds, together with a persistent temperature inversion, limit the vertical dispersion of air pollutants throughout the Basin. Strong, dry, north or northeasterly winds, known as Santa Ana winds, occur during the fall and winter months, dispersing air contaminants. The Santa Ana conditions tend to last for several days at a time.

The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. On days of no inversion or high wind speeds, ambient air pollutant concentrations are the lowest. During periods of low inversions and low wind speeds, air pollutants generated in urbanized areas are transported predominantly onshore into Riverside and San Bernardino counties. In the winter, the greatest pollution problems are CO and NO_X because of extremely low inversions and air stagnation during the night and early morning hours. In the summer, the longer daylight hours and brighter sunshine combine to cause a reaction between hydrocarbons and NO_x to form photochemical smog. Smog is a general term that is naturally occurring fog that has become mixed with smoke or pollution. In this context it is better described as a form of air pollution produced by the photochemical reaction of sunlight with pollutants that have been released into the atmosphere, especially by automotive emissions.

Attainment Status. CARB is required to designate areas of the State as attainment, nonattainment, or unclassified for all State standards. An attainment designation for an area signifies that pollutant concentrations did not violate the standard for that pollutant in that area. A nonattainment designation indicates that a pollutant concentration violated the standard at least once, excluding those occasions when a violation was caused by an exceptional event, as defined in the criteria. An unclassified designation signifies that data do not support either an attainment or nonattainment status. The CCAA divides districts into moderate, serious, and severe air pollution categories, with increasingly stringent control requirements mandated for each category.

The EPA designates areas for O_3, CO, and NO_2 as one of the following: does not meet the primary standards, or cannot be classified, or better than national standards. For SO_2, areas are designated as: does not meet the primary standards, does not meet the secondary standards, cannot be classified, or better than national standards. On February 2024, the EPA issued a final revised standard for $PM_{2.5}$ to lower the primary standard from 12 µg/m^3 to 9 µg/m^3. The EPA will issue final area designations in February 2026. **Table 4.1.3** provides a summary of the attainment status for the Basin with respect to both National and California Ambient Air Quality Standards (NAAQS and CAAQS, respectively).

Table 4.1.3: South Coast Air Basin Attainment Status

Pollutant	State	Federal
O_3 1 hour	Nonattainment	Extreme Nonattainment
O_3 8 hour	Nonattainment	Extreme Nonattainment
PM_{10}	Nonattainment	Attainment/Maintenance
$PM_{2.5}$	Nonattainment	Serious Nonattainment
CO	Attainment	Attainment/Maintenance
NO_2	Attainment	Attainment/Maintenance
SO_2	N/A	Attainment/Unclassified
Lead	Attainment	Partial Nonattainment[1]
All others	Attainment/Unclassified	Attainment/Unclassified

Source: South Coast Air Quality Management District (2016b).

[1] Partial Nonattainment designation – Los Angeles County portion of Basin only for near-source monitors. Expect redesignation to attainment based on current monitoring data.

CO = carbon monoxide
N/A = not applicable
NO_2 = nitrogen dioxide
O_3 = ozone
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SO_2 = sulfur dioxide

Air Quality Monitoring Results. Air quality monitoring stations are located throughout the nation and are maintained by the local air pollution control district and State air quality regulating agencies. The SCAQMD, together with the CARB, maintains ambient air quality monitoring stations in the Basin. The air quality monitoring station closest to the City is the station at 1630 West Pampas Lane in Anaheim.

Pollutant monitoring results for 2021, 2022, and 2023 at the Anaheim monitoring station are shown in **Table 4.1.4.** Monitoring indicates that air quality in the vicinity of the City has generally been good. As indicated by the monitoring results, the federal PM_{10} standard was not exceeded during this 3-year period. The State PM_{10} standard was exceeded once in 2021, and an unknown number of times in 2022 and 2023. The federal $PM_{2.5}$ standard had 10 exceedances in 2021, no exceedances in 2022, and an unknown number of exceedances in 2023. The State 1-hour and 8-hour ozone standards had no exceedances in 2021 and an unknown number of exceedances in 2022 and 2023. The federal 8-hour standards had no exceedances in 2021 and one exceedance in 2022 and 2023. The CO and NO_2 standards were not exceeded in this area during this 3-year period. SO_2 data were not available from 2021 to 2023 at air quality monitoring stations in Orange County.

4.1.4 Methodology

The proposed project would result in criteria pollutant emissions from construction and operational sources. Construction activities would generate emissions at the project site from off-road construction equipment, and on road construction-related truck hauling, vendor deliveries, and worker commuting. Project-related operational activities would generate emissions from vehicle traffic and miscellaneous sources at the project site, such as natural gas combustion associated with heating, and use of landscaping equipment. This analysis used the California Emissions Estimator Model (CalEEMod), Version 2022.1, to quantify criteria pollutant emissions for both construction and operation of the proposed project.

Table 4.1.4: Ambient Air Quality in the Project Vicinity

Pollutant	Standard	2021	2022	2023
Carbon Monoxide (CO)[1]				
Maximum 1-hour concentration (ppm)		2.1	2.4	2.5
Number of days exceeded:	State: > 20 ppm	0	0	0
	Federal: > 35 ppm	0	0	0
Maximum 8-hour concentration (ppm)		1.5	1.4	1.6
Number of days exceeded:	State: > 9 ppm	0	0	0
	Federal: > 9 ppm	0	0	0
Ozone (O_3)[1]				
Maximum 1-hour concentration (ppm)		0.089	0.102	0.089
Number of days exceeded:	State: > 0.09 ppm	0	ND	ND
Maximum 8-hour concentration (ppm)		0.068	0.076	0.076
Number of days exceeded:	State: > 0.07 ppm	0	ND	ND
	Federal: > 0.07 ppm	0	1	1
Coarse Particulates (PM_{10})[1]				
Maximum 24-hour concentration (µg/m^3)		63.6	67.0	97.0
Number of days exceeded:	State: > 50 µg/m^3	1	ND	ND
	Federal: > 150 µg/m^3	0	0	0
Annual arithmetic average concentration (µg/m^3)		23.2	ND	ND
Exceeded for the year:	State: > 20 µg/m^3	Yes	ND	ND
	Federal: > 50 µg/m^3	No	ND	ND
Fine Particulates ($PM_{2.5}$)[1]				
Maximum 24-hour concentration (µg/m^3)		54.4	33.1	45.6
Number of days exceeded:	Federal: > 35 µg/m^3	10	0	ND
Annual arithmetic average concentration (µg/m^3)		11.5	9.9	9.5
Exceeded for the year:	State: > 12 µg/m^3	No	No	No
	Federal: > 15 µg/m^3	No	No	No
Nitrogen Dioxide (NO_2)[1]				
Maximum 1-hour concentration (ppm)		0.067	0.053	0.051
Number of days exceeded:	State: > 0.250 ppm	0	0	0
Annual arithmetic average concentration (ppm)		0.012	0.012	0.010
Exceeded for the year:	Federal: > 0.053 ppm	No	No	No
Sulfur Dioxide (SO_2)[1]				
Maximum 1-hour concentration (ppm)		ND	ND	ND
Number of days exceeded:	State: > 0.25 ppm	ND	ND	ND
Maximum 24-hour concentration (ppm)		ND	ND	ND
Number of days exceeded:	State: > 0.04 ppm	ND	ND	ND
	Federal: > 0.14 ppm	ND	ND	ND
Annual arithmetic average concentration (ppm)		ND	ND	ND
Exceeded for the year:	Federal: > 0.030 ppm	ND	ND	ND

Sources: CARB (2021) and USEPA (2021).
[1] Data taken from the Anaheim monitoring station at 1630 West Pampas Lane.
CARB = California Air Resources Board
ND = No data. There were insufficient (or no) data to determine the value.
ppm = parts per million
USEPA = United States Environmental Protection Agency

CalEEMod provides a platform to calculate both construction emissions and operational emissions from a project. It calculates both the daily maximum and annual average emissions for criteria pollutants as well as total or annual greenhouse gas (GHG) emissions. The model also provides default values for water and energy use. Specifically, the model performs the following calculations:

- Short-term construction emissions associated with demolition, site preparation, grading, building, architectural coating (painting), and paving from off-road construction equipment; on-road mobile equipment associated with workers, vendors, delivery, and hauling; fugitive dust associated with grading, demolition, truck loading, and roads; and emissions of volatile organic compounds (VOCs) from architectural coating and paving.

- Operational emissions, such as on-road mobile vehicle traffic generated by the land uses, fugitive dust associated with roads, volatile emissions of reactive organic gases (ROGs) from architectural coatings, off-road emissions from landscaping equipment, volatile emissions of ROGs from consumer products and cleaning supplies, natural gas usage in the buildings, electricity usage in the buildings, water usage by the land uses, and solid waste disposal by the land uses. To assess potential operational impacts under a worst-case scenario (from an emissions perspective), the analysis assumed that 100 percent of the warehouse square footage would be refrigerated and that 100 percent of the trucks accessing the project site would be refrigerated trucks.

In addition, CalEEMod contains default values and existing regulation methodologies to use in each specific local air quality district region. Appropriate statewide default values can be used if regional default values are not defined. This analysis used project-specific inputs and relevant model default factors for the Orange County area, consistent with SCAQMD requirements. CalEEMod was used to calculate project-related construction and operational emissions of criteria pollutants. The CalEEMod output is provided in **Appendix C** of this Draft EIR.

4.1.5 Thresholds of Significance

The thresholds for air quality impacts used in this analysis are consistent with Appendix G of the State CEQA Guidelines and the City's Initial Study/Environmental Checklist. The proposed project may be deemed to have a significant impact with respect to air quality if it would:

Threshold AQ-1: Conflict with or obstruct implementation of the applicable air quality plan?

Threshold AQ-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Threshold AQ-3: Expose sensitive receptors to substantial pollutant concentrations?

Threshold AQ-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

As stated in Appendix G of the State CEQA Guidelines, where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied

upon to make determinations about a project's impacts. This Draft EIR uses the adopted thresholds of the SCAQMD, the local air quality management district.

4.1.5.1 Regional Emissions Thresholds

SCAQMD has established daily emissions thresholds for construction and operation of a proposed project in the Basin. The emissions thresholds were established based on the attainment status of the Basin with regard to air quality standards for specific criteria pollutants. Because the concentration standards were set at a level that protects public health with an adequate margin of safety, these emissions thresholds are regarded as conservative and would overstate an individual project's contribution to health risks.

Table 4.1.5, below, lists the CEQA significance thresholds for the construction and operational emissions established for the Basin.

Table 4.1.5: Regional Thresholds for Construction and Operational Emissions

Emissions Source	Pollutant Emissions Threshold (lbs/day)					
	VOC	NO_x	CO	PM_{10}	$PM_{2.5}$	SO_x
Construction	75	100	550	150	55	150
Operations	55	55	550	150	55	150

Source: SCAQMD. Air Quality Significance Thresholds. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf (accessed June 2024).

CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOC = volatile organic compounds

Projects in the Basin with construction- or operation-related emissions that exceed any of their respective emission thresholds would be considered significant under SCAQMD guidelines. These thresholds, which SCAQMD developed and that apply throughout the Basin, apply as both project and cumulative thresholds. If a project exceeds these standards, it is considered to have a project-specific and cumulative impact.

4.1.5.2 Localized Impacts

The SCAQMD published its *Final Localized Significance Threshold Methodology* in July 2008, recommending that all air quality analyses include an assessment of air quality impacts to nearby sensitive receptors.[16] This guidance was used to analyze potential localized air quality impacts associated with construction of the proposed project. Localized significance thresholds (LSTs) are developed based on the size or total area of the emission source, the ambient air quality in the source receptor area, and the distance between the project and the nearest sensitive receptor. The SCAQMD defines structures that house persons (e.g., children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise) or

[16] South Coast Air Quality Management District (SCAQMD). 2008. *Final Localized Significance Threshold Methodology.* July. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf (accessed May 13, 2024).

places where they gather as sensitive receptors (i.e., residences, schools, playgrounds, child-care centers, convalescent centers, retirement homes, and athletic fields).

LSTs are based on the ambient concentrations of that pollutant within the project Source Receptor Area (SRA) and the distance to the nearest sensitive receptor. For the proposed project, the appropriate SRA for the LST is the Central Orange County area (SRA 17). SCAQMD provides LST screening tables for 25-, 50-, 100-, 200-, and 500-meter source-receptor distances. While the project site is approximately 8.53 acres, based on the anticipated construction equipment and grading and ground-disturbing activities, it is assumed that the maximum daily disturbed area for the proposed project would be 3.5 acres.

The nearest sensitive receptors for air quality emissions include the residential homes located north of the project site at approximately 1,398 feet from the project site boundary line. Therefore, the LST for a 3.5-acre site at 1,398 feet (426 meters) were derived by interpolation.[17] The LST analysis followed the guidance of the SCAQMD for evaluating sensitive receptors, discussed in further detail in this analysis. **Table 4.1.6** lists the LST thresholds that apply during project construction and operation. To be conservative, this LST analysis assumes all area, stationary, and energy source emissions would occur on site, and 5 percent of the project-related new mobile sources, which is an estimate of the amount of project-related on-site vehicle and truck travel, would occur on site. These emissions would be compared against the operational threshold.

Table 4.1.6: SCAQMD LST Thresholds (lbs/day)

Emissions Source Category	NO_X	CO	PM_{10}	$PM_{2.5}$
Construction (3.5-acre, 426-meter distance)	213.0	7,166.0	153.0	83.0
Operations (3.5-acre, 426-meter distance)	213.0	7,166.0	37.0	20.0

Source: Final Localized Significance Threshold Methodology (SCAQMD 2008).
Note: SRA 17— Central Orange County, 3.5 acres, receptors at 1,398 feet (426 meters).
CO = carbon monoxide
lbs/day = pounds per day
LST = localized significance threshold
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SRA = source receptor area

4.1.5.3 Local Microscale Concentration Standards

The significance of localized project impacts under CEQA depends on whether ambient CO levels in the vicinity of the project are above or below State and federal CO standards. Because ambient CO levels are below the standards throughout the Basin, a project would be considered to have a significant CO impact if project emissions result in an exceedance of one or more of the 1-hour or 8-hour standards. The following are applicable local emission concentration standards for CO:

- California State 1-hour CO standard of 20 parts per million (ppm)
- California State 8-hour CO standard of 9 ppm

[17] SCAQMD. n.d. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf (accessed May 13, 2024).

4.1.6 Project Impacts

Threshold AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Impact AQ-1: Less Than Significant Impact. An AQMP describes air pollution control strategies to be undertaken by a city or county in a region classified as a nonattainment area to meet the requirements of the federal Clean Air Act. The main purpose of an AQMP is to bring an area into compliance with the requirements of federal and State ambient air quality standards (AAQS). The Basin is in nonattainment for the federal and State standards for O_3 and $PM_{2.5}$. In addition, the Basin is in nonattainment for the PM_{10} standard. Therefore, the Basin is classified as a nonattainment area and an AQMP is required. The applicable air quality plan is the SCAQMD's adopted 2022 AQMP.[18] The AQMP is based on regional growth projections developed by the SCAG.

A consistency determination plays an essential role in local agency project review by linking local planning and unique individual projects to the air quality plans. A consistency determination fulfills the CEQA goal of fully informing local agency decision-makers of the environmental costs of the project under consideration at a stage early enough to ensure that air quality concerns are addressed. Only new or amended General Plan elements, Specific Plans, and significantly unique projects need to undergo a consistency review given that the air quality plan strategy is based on projections from local General Plans.

The City's General Plan is consistent with the SCAG Regional Comprehensive Plan Guidelines and the SCAQMD AQMP. Pursuant to the methodology provided in the SCAQMD's *CEQA Air Quality Handbook*, consistency with the Basin 2022 AQMP is affirmed when a project: (1) would not increase the frequency or severity of an air quality standards violation or cause a new violation, and (2) is consistent with the growth assumptions in the AQMP. Consistency review is presented as follows:

1. The proposed project would result in short-term construction and long-term operational pollutant emissions that are all less than the CEQA significance emissions thresholds established by SCAQMD. Therefore, the proposed project would not result in an increase in the frequency or severity of an air quality standards violation or cause a new air quality standards violation.

2. The *CEQA Air Quality Handbook* indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities. As discussed in Chapter 3.0, Project Description, the proposed project would not include or require any amendments to the City's General Plan or City's Zoning Ordinance. However, the proposed project is located within Planning Area 1 of the McDonnell Specific Plan, which is currently designated for general office uses. As such, the proposed project would require an amendment to the McDonnell Specific Plan to allow light industrial uses in the

[18] South Coast Air Quality Management District (SCAQMD). 2022. *2022 Air Quality Management Plan*. Adopted December 2, 2022.

eastern portion of Planning Area 1, and removal of the maximum developable area requirement while retaining the 1.0:1 FAR to maintain consistency with the General Plan.

In order to determine the proposed project's consistency with the 2022 AQMP, the project must be consistent with the AQMP growth assumptions, which are based, in part, on assumptions made by local planning agencies in SCAG's RTP/SCS regarding population, housing, and growth trends. According to SCAG's 2024–2050 RTP/SCS, the City's households and employment are forecast to increase by approximately 3,900 households and 2,000 jobs, respectively, between 2019 and 2050 and would total approximately 20,300 households and 28,100 jobs by 2050.[19] The proposed project would include a 191,394-square-foot light industrial building, parking, landscaping, and associated improvements which is estimated to generate approximately 93 employees. It is anticipated that the additional 93 employees would fall within the 28,100 projected jobs for the City. Therefore, it is assumed that the project's labor demand would not substantially increase employment projections in the City. As such, the project would be consistent with SCAG's growth assumptions for new job growth in the region as identified in the RTP/SCS.

Additionally, based on the proposed project size (191,394 square feet), the proposed project is not considered a project of statewide, regional, or areawide significance (e.g., large-scale projects such as airports, electrical generating facilities, petroleum and gas refineries, residential developments of more than 500 dwelling units, and shopping centers or business establishments employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space) as defined in the California Code of Regulations (CCR) (Title 14, Division 6, Chapter 3, Article 13, Section 15206(b)). Because the proposed project would not be defined as a regionally significant project under CEQA, it does not meet the SCAG's Intergovernmental Review criteria.

Based on the consistency analysis presented above, the proposed project would be consistent with the regional AQMP. Therefore, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant, and no mitigation is required.

Threshold AQ-2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Impact AQ-2: Less Than Significant Impact. the Basin is currently designated as nonattainment for the federal and State standards for O_3 and $PM_{2.5}$. In addition, the Basin is in nonattainment for the PM_{10} standard. The Basin's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of AAQS. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a

[19] Southern California Association of Governments (SCAG). 2024. Connect SoCal 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy. Website: https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839 (accessed May 2024).

project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the SCAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified SCAQMD significance thresholds identified above in **Table 4.1.6**, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is not necessary. The following analysis assesses the potential project-level air quality impacts associated with construction and operation of the proposed project.

Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e., fugitive dust) generated by demolition, grading, building construction, paving, and other activities. Emissions from construction equipment are also anticipated and would include CO, NO_x, VOCs, directly emitted $PM_{2.5}$ or PM_{10}, and TACs such as diesel exhaust particulate matter.

Construction activities associated with the proposed project would include demolition, grading, site preparation, building construction, architectural coating, and paving activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and amount of operating equipment. Larger dust particles would settle near the source, whereas fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. SCAQMD has established Rule 403: Fugitive Dust, which would require the Applicant to implement measures that would reduce the amount of particulate matter generated during the construction period. The Rule 403 measures that were incorporated in this analysis include:

- Water active sites at least three times daily (locations where grading is to occur shall be thoroughly watered prior to earthmoving).

- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet (0.6 meter) of freeboard (vertical space between the top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.

- Reduce traffic speeds on all unpaved roads to 15 miles per hour or less.

In addition to dust-related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, sulfur oxides (SO_x), NO_x, VOCs and some soot particulate ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction activities were to increase traffic

congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

Construction emissions were estimated for the proposed project using the CalEEMod. As stated in Chapter 3.0, Project Description, the project would construct a new light industrial building totaling 191,394 square feet, including 181,061 square feet of warehouse space and 10,333 square feet of office space, which was included in CalEEMod. This analysis assumes that 100 percent of the warehouse space would be refrigerated and that trucks accessing the site would also be refrigerated. The analysis also assumes that construction is anticipated to occur over a 11-month duration, with construction beginning in November 2024 and completion expected in October 2025. In addition, the proposed project would require the export of approximately 940 cubic yards of soil, which was included in CalEEMod. Other precise details of construction activities are unknown at this time; therefore, default settings (e.g., construction equipment and worker trips) from CalEEMod were used. Use of Tier 2 construction equipment was included in the CalEEMod modeling. **Table 4.1.6** identifies the maximum daily emissions associated with construction activities during each construction phase.

As shown in **Table 4.1.7**, construction emissions associated with the proposed project would not exceed the SCAQMD's thresholds for VOCs, NO_X, CO, SO_X, $PM_{2.5}$, and PM_{10}. Therefore, construction of the proposed project would not result in a cumulatively considerable increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State AAQS. Impacts would be less than significant, and no mitigation is required.

Table 4.1.7: Short-Term Regional Construction Emissions

Construction Phase	Maximum Daily Regional Pollutant Emissions (lbs/day)					
	VOCs	NO_X	CO	SO_X	Total PM_{10}	Total $PM_{2.5}$
Demolition	0.8	27.5	20.1	<0.1	4.0	1.3
Site Preparation	1.1	39.9	29.2	<0.1	9.0	5.0
Grading	0.8	23.8	18.7	<0.1	3.8	2.1
Building Construction	0.9	20.3	19.3	<0.1	2.0	1.0
Paving	1.1	13.4	11.3	<0.1	0.8	0.6
Architectural Coating	24.1	1.2	1.7	<0.1	0.3	0.1
Peak Daily Emissions	**25.2**	**39.9**	**29.2**	**<0.1**	**9.0**	**5.0**
SCAQMD Threshold	**75.0**	**100.0**	**550.0**	**150.0**	**150.0**	**55.0**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (June 2024).
Note: Maximum emissions of VOCs occurred during the overlapping building construction and architectural coating phases
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

Operational Air Quality Impacts. Long-term air pollutant emissions associated with operation of the proposed project include emissions from area, energy, and mobile sources. Area-source emissions include architectural coatings, consumer products, and landscaping. Energy-source emissions result

from activities in buildings that use electricity and natural gas. Mobile-source emissions are from vehicle trips associated with operation of the proposed project.

Typically, area source emissions consist of direct sources of air emissions located at the project site, including architectural coatings and the use of landscape maintenance equipment. Area source emissions associated with the project would include emissions from the use of landscaping equipment and consumer products.

Energy-source emissions result from activities in buildings for which natural gas is used. The quantity of emissions is the product of usage intensity (i.e., the amount of natural gas) and the emission factor of the fuel source. The emission factor is determined by the fuel source, with cleaner energy sources, like renewable energy, producing fewer emissions than conventional sources. The proposed project would comply with the latest California Green Building Standards Code.

Mobile source emissions are generated by the vehicle trips associated with project operations. PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Entrainment of PM_{10} occurs when vehicle tires pulverize small rocks and pavement and the vehicle wakes generate airborne dust. The contribution of tire and brake wear is small compared to the other particulate matter emission processes. Additionally, gasoline-powered engines have small rates of particulate matter emissions compared with diesel-powered vehicles.

Long-term operation emissions associated with the proposed project were calculated using CalEEMod. The proposed project analysis was conducted using land use codes *Refrigerated Warehouse No-Rail,* and *Parking Lot*. Trip generation rates used in CalEEMod for the proposed project were based on the project's trip generation estimates identified in the proposed project's Traffic Analysis (provided in **Appendix E** of this Draft EIR).[20] The proposed project would generate a total of 406 average daily trips (ADT), including 262 passenger vehicle trips, 50 two-axle truck trips, 16 three-axle truck trips, and 78 four-axle truck trips, which was included in CalEEMod. This analysis assumes that the four+-axle truck trips would travel approximately 40 miles. To be conservative, separate CalEEMod analyses were prepared for the operational analysis for the proposed project. One CalEEMod run evaluated operational and vehicle trip emissions and another CalEEMod run evaluated four+-axle truck trip emissions. In addition, it was conservatively assumed that trucks of all sizes would have diesel-powered transportation refrigerated units (TRUs). As a conservative assumption, the TRUs were modeled to be operational for up to 15 minutes per day. To be sure, 15 minutes is a conservative estimation of operational time for TRUs, as it represents a three-times exceedance of CARB's anti-idling rules, which prohibit idling for more than 5 minutes.[21] Moreover, truck operators will have access to plug-in power to operate the TRUs and will be incentivized to do so based on their own fuel costs and compliance with the CARB TRU ATCM. However, to be conservative, the 15-minute runtime assumption does not take into account plugging into electric

[20] Urban Crossroads. 2023. *Goodman Commerce Center Traffic Analysis*. November 21, 2023.

[21] CARB. 2004. Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. July 22. Website: https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling/about (accessed July 2024).

power sources. When project-specific data were not available, default assumptions from CalEEMod were used to estimate project emissions.

Long-term operational emissions associated with the existing uses were also evaluated in CalEEMod. The project site is developed with an existing 150,626-square-foot building. For purposes of analysis, and as described in Chapter 3, Project Description, the project's Traffic Analysis conservatively assumes that 37,657 square feet (25 percent) of the existing building was occupied with office uses.

The long-term operational emissions associated with the proposed project are shown in **Table 4.1.8**.

Table 4.1.8: Project Operational Emissions

Emission Type	Pollutant Emissions (lbs/day)					
	VOCs	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Existing Uses Operational Emissions						
Mobile Sources	1.4	1.1	11.0	<0.1	2.2	0.6
Area Sources	1.2	<0.1	1.6	<0.1	<0.1	<0.1
Energy Sources	<0.1	0.3	0.2	<0.1	<0.1	<0.1
Total Existing Emissions	**2.6**	**1.4**	**12.8**	**<0.1**	**2.2**	**0.6**
Proposed Project Operational Emissions						
Mobile Sources – Vehicles and Light Duty Trucks	0.7	0.7	6.2	<0.1	1.8	0.5
Mobile Sources – Heavy Duty Trucks	0.2	12.6	5.1	0.1	3.0	0.9
Area Sources	6.0	0.1	8.3	<0.1	<0.1	<0.1
Energy Sources	0.1	1.3	1.1	<0.1	0.1	0.1
TRU Truck Emissions	0.9	2.6	0.1	<0.1	<0.1	<0.1
Total Project Emissions	**7.9**	**17.3**	**20.8**	**0.1**	**4.9**	**1.5**
Total Net Emissions	**10.6**	**15.9**	**8.0**	**0.0**	**2.7**	**0.9**
SCAQMD Threshold	**55.0**	**55.0**	**550.0**	**150.0**	**150.0**	**55.0**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (June 2024).
Note: Some values may not appear to add correctly due to rounding.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

The results shown in **Table 4.1.8** indicate operational emissions associated with the proposed project would not exceed the significance criteria for daily VOCs, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State AAQS. Impacts would be less than significant, and no mitigation is required.

Long-Term Microscale (CO Hot Spot) Analysis. Vehicular trips associated with the proposed project would contribute to congestion at intersections and along roadway segments in the vicinity of the project site. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited; under normal meteorological conditions, it disperses rapidly with distance from the source.

However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels, affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients). Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

An assessment of project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Existing CO concentrations in the immediate project vicinity are not available. Ambient CO levels monitored at the Anaheim Monitoring Station, located at 1630 W. Pampas Lane in Anaheim, showed a highest recorded 1-hour concentration of 2.5 parts per million (ppm) (the State standard is 20 ppm) and a highest 8-hour concentration of 1.6 ppm (the State standard is 9 ppm) from 2021 to 2023. The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under peak traffic conditions represent a worst-case analysis. Reduced speeds and vehicular congestion at intersections result in increased CO emissions.[22]

Based on the trip generation described in Section 4.7, Transportation, the proposed project would generate 406 ADT, with approximately 21 trips occurring in the AM peak hour and approximately 24 trips occurring in the PM peak hour. As the proposed project would not generate 100 or more AM or PM peak hour trips, the proposed project did not meet the criteria for an evaluation of study area intersection or roadway segment levels of service. Overall, truck trips associated with the project are minor relative to the existing traffic on nearby streets that are proximate to residential uses, such as Valley View Street. Furthermore, as described in the project's traffic analysis, truck trips will disperse along roadways, not concentrating trips on a specific roadway. As a result, per hour truck trips associated with the project on surrounding streets proximately located near residential uses are expected to be negligible in the context of overall existing traffic volumes. Finally, Valley View Street is a designated truck route and a "major" roadway in the City's General Plan and, along with Katella Avenue, carries the highest volumes of daily traffic in the City. (General Plan at CIR-4.) Therefore, it is assumed that the addition of the proposed project traffic would not create any significant adverse impacts to nearby intersections or have impacts on sensitive receptors.

Therefore, given the extremely low level of CO concentrations in the vicinity of the project site and the lack of traffic impacts at any intersections, project-related vehicles are not expected to contribute significantly to CO concentrations exceeding the State or federal CO standards. Because no CO hot spot would occur, as identified in the proposed project, there would be no project-related impacts on CO concentrations. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under applicable NAAQS and CAAQS, and impacts would be less than significant.

[22] United States Environmental Protection Agency (USEPA). Outdoor Air Quality Data. 2021. Website: https://www.epa.gov/outdoor-air-quality-data/monitor-values-report (accessed May 13, 2024).

Threshold AQ-3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-3: Less Than Significant Impact. The SCAQMD defines structures that house persons (e.g., children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise) or places where they gather (i.e., residences, schools, playgrounds, child-care centers, convalescent centers, retirement homes, and athletic fields) as sensitive receptors. Sensitive receptors are defined as people who have an increased sensitivity to air pollution or environmental contaminants. The nearest sensitive receptors for air quality emissions include the residential uses approximately 1,398 feet north of the project site boundary line.

As discussed above, LSTs are based on the ambient concentrations of that pollutant within the project SRA and the distance to the nearest sensitive receptor. SCAQMD provides LST screening tables for 25-, 50-, 100-, 200-, and 500-meter source-receptor distances. For the proposed project, the appropriate SRA for the LST is the Central Orange County area (SRA 17). While the project site is approximately 8.53 acres, based on the anticipated construction equipment and grading and ground-disturbing activities, it is assumed that the maximum daily disturbed area for the proposed project would be 3.5 acres. Therefore, the LSTs for a 3.5-acre site at 1,398 feet (426 meters) were derived by interpolation.

By design, the localized impacts analysis only includes on-site sources; however, the CalEEMod outputs do not separate on-site and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions detailed in **Table 4.1.9** assume all area, stationary, and energy source emissions would occur on site, and 5 percent of the project-related new mobile sources, which is an estimate of the amount of project-related on-site vehicle and truck travel, would occur on site. Considering the total trip length included in CalEEMod, the 5 percent assumption is conservative. The results of the LST analysis for both construction and operation of the proposed project are summarized in **Tables 4.1.9** and **4.1.10** below. As shown in **Tables 4.1.9** and **4.1.10,** the proposed project would not result in an exceedance of a SCAQMD LST during project construction or operation. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant. Mitigation is not required.

Table 4.1.9: Construction Localized Emissions

Emissions Sources	Pollutant Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Construction Emissions	39.9	28.3	8.8	5.0
SCAQMD LST	**213.0**	**1,766.0**	**153.0**	**83.0**
Significant Emissions?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (June 2024).
Note: SRA 17— Central Orange County, 3.5 acres, receptors at 1,398 feet (426 meters).
CO = carbon monoxide
lbs/day = pounds per day
LST = localized significance threshold
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SRA = Source Receptor Area

Table 4.1.10: Operational Localized Emissions

Emissions Sources	Pollutant Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions	1.4	10.0	<1.0	<1.0
SCAQMD LST	**213.0**	**1,766.0**	**37.0**	**20.0**
Significant Emissions?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (June 2024).
Note: SRA 17— Central Orange County, 3.5 acre, receptors at 1,398 feet (426 meters), on-site traffic 5 percent of total.
CO = carbon monoxide
lbs/day = pounds per day
LST = localized significance threshold
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SRA = Source Receptor Area

Threshold AQ-4: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact AQ-4: Less Than Significant Impact.

Construction. Potential odor sources associated with the proposed project may result from Heavy-heavy-duty equipment on the project site during construction would emit odors, primarily from equipment exhaust. In addition, the application of asphalt and architectural coatings during construction activities may result in odors. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and are thus considered less than significant.

Operation. SCAQMD Rule 402 regarding nuisances states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."

The proposed project would construct a light industrial building. Therefore, the proposed project does not contain land uses typically associated with emitting objectionable odors. The proposed project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed project construction and operations would be less than significant, and no mitigation is required.

4.1.7 Level of Significance Prior to Mitigation

The proposed project would not result in any significant impacts related to air quality, and no mitigation is required.

4.1.8 Regulatory Compliance Measures and Mitigation Measures

No regulatory compliance measures are applicable to the proposed project, and no mitigation is required.

4.1.9 Level of Significance after Mitigation

The proposed project would not result in any significant impacts related to air quality.

4.1.10 Cumulative Impacts

As defined in the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for air quality. The cumulative impact area for air quality related to the proposed project is the South Coast Air Basin. Each project in the Basin is required to comply with SCAQMD rules and regulations and is subject to independent review. Per SCAQMD guidance, projects that exceed project-specific significance thresholds are considered to be cumulatively considerable. Conversely, projects that do not exceed project-specific thresholds are generally not considered to be cumulatively significant.[23]

The Basin is currently designated as a nonattainment area for the federal O_3 standard and $PM_{2.5}$ standard and as a nonattainment area for the State O_3, PM_{10}, and $PM_{2.5}$ standard. Thus, the Basin has not met the federal and State standards for these air pollutants. Future development that may take place with implementation of the project would contribute criteria pollutants to the area during project construction and operation.

Air pollution is inherently a cumulative type of impact measured across an air basin. The discussion under Threshold AQ-2, above, includes an analysis of the proposed project's contribution to cumulative air impacts. As discussed above, construction emissions associated with the proposed project would not exceed the SCAQMD thresholds for VOCs, NO_x, CO, SO_X, $PM_{2.5,}$ or PM_{10} emissions. The proposed project's construction- and operation-related regional daily emissions are less than the SCAQMD significance thresholds for all criteria pollutants. In addition, adherence to SCAQMD rules and regulations on a project-by-project basis would substantially reduce potential impacts associated with the related projects and basin-wide air pollutant emissions. Therefore, the proposed project would not have a cumulatively considerable increase in emissions and the proposed project's cumulative air quality impacts would be less than significant.

[23] Goss, Tracy A and Kroeger, Amy, *White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution, Appendix D, Cumulative Impact Requirements Pursuant to the California Environmental Quality Act*, <https://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4> (Accessed May 24, 2024).

4.2 CULTURAL RESOURCES

This section evaluates the potential for the 5665 Plaza Drive Project (proposed project) to impact cultural resources. Cultural resources are sites, buildings, structures, objects, and districts over 50 years old that may have traditional or cultural value for the historical significance they possess. This section summarizes information obtained from the *Phase I Environmental Site Assessment (Phase I ESA) 5665 Plaza Drive Cypress*, California, prepared by Stantec Consulting Services, Inc. (September 2021) and provided in **Appendix D** of this Draft EIR.

The term "site" is used in two contexts in this section:

- "Project site" refers to the approximately 8.53-acre site proposed for development.
- "Cultural resources site" refers to the specific locations of documented cultural materials or artifacts.

4.2.1 Scoping Process

The City received 3 comment letters during the public review period for the NOP. For copies of the NOP comment letters, refer to **Appendix A** of this Draft EIR. None of the comment letters included comments related to cultural resources.

4.2.2 Regulatory Setting

This section includes applicable federal, State, regional, and City regulations.

4.2.2.1 Federal Regulations

The National Historic Preservation Act of 1966 (NHPA) (16 U.S.C. ch. 1A, subch. II; § 470). The NHPA was enacted to preserve historical and archaeological sites in the United States. The NHPA established the Advisory Council on Historic Preservation (ACHP), the National Register of Historic Places (National Register), State Historic Preservation Offices and Officers (SHPOs), and allows for Native American Indian tribes to assume part or all of the SHPO's role through establishment of Tribal Historic Preservation Officers (THPOs). The NHPA also established the Section 106 consultation process, which mandates that federal agencies proposing actions that may affect historic properties eligible for or listed on the National Register must engage in consultation with interested parties. This typically includes consultation with the SHPO/THPO, local and State historical societies and organizations; and the ACHP. As part of this process, the federal agency must identify information on eligible or listed historic properties. If a historic property has the potential to be affected by the federal action, the federal agency must determine whether the effect would be adverse. If there is a potential adverse effect, the federal agency must resolve the adverse effect through the consultation process.

A cultural resource is evaluated for eligibility for listing in the National Register according to four criteria. These criteria generally require that the resource be 50 years of age or older and significant at the local, State, or national level according to one or more of the following:

A. It is associated with events that have made a significant contribution to the broad patterns of our history;

B. It is associated with the lives of persons significant in our past;

C. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values, or that represent a significant and distinguishable entity whose components lack individual distinction; and/or

D. It has yielded, or may be likely to yield, information important to prehistory or history.

Properties that are not 50 years of age or older must have "exceptional significance" in accordance with National Register Criteria Considerations. The National Register also requires that a resource possess integrity, which is defined as "the ability of a property to convey its significance." The aspects of integrity are location, design, setting, materials, workmanship, feeling, and association. To determine which of these factors are most important will depend on the particular National Register criterion under which the resource is considered eligible for listing.

The Native American Graves Protection and Repatriation Act (NAGPRA) (25 U.S.C. ch. 32 § 3001 *et seq.*). The NAGPRA describes the rights of Native American lineal descendants, Indian tribes, and Native Hawaiian organizations with respect to the treatment, repatriation, and disposition of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony, referred to collectively in the statute as cultural items, with which they can show a relationship of lineal descent or cultural affiliation. It requires that federal agencies and museums receiving federal funds inventory holdings of Native American human remains and funerary objects and provide written summaries of other cultural items.[24]

4.2.2.2 State Regulations

California Environmental Quality Act (Pub. Res. Code § 21000 *et seq.*). CEQA requires lead agencies to determine whether their projects would have a significant impact on the environment, including significant impacts to historical or unique archaeological resources. CEQA defines a "historical resource" as a resource that meets one or more of the following criteria: (1) listed in, or determined eligible for listing in, the California Register (of Historic Resources); (2) listed in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); (3) identified as significant in a historical resource survey meeting the requirements of Public Resources Code Section 5024.1(g); or (4) determined to be a historical resource by a project's Lead Agency (Pub. Res. Code Section 21084.1 and State CEQA Guidelines Section 15064.5(a)). A historical resource consists of:

> "Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California…. Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing

[24] National Park Service (NPS). The Native American Graves Protection and Repatriation Act (NAGPRA). Website: https://www.nps.gov/archeology/tools/laws/nagpra.htm (accessed January 10, 2024).

on the California Register of Historical Resources" (State CEQA Guidelines Section 15064.5(a)(3)).

In accordance with State CEQA Guidelines Section 15064.5(b), a substantial adverse change in the significance of a historical resource is a significant effect on the environment.

CEQA requires a Lead Agency to determine whether an archaeological cultural resource meets the definition of a historical resource, a unique archaeological resource, or neither (State CEQA Guidelines Section 15064.5(c)). Prior to considering potential impacts, the Lead Agency must determine whether an archaeological cultural resource meets the definition of a historical resource in State CEQA Guidelines Section 15064.5(c)(1). If the archaeological cultural resource meets the definition of a historical resource, it is treated like any other type of historical resource in accordance with State CEQA Guidelines Section 15126.4. Historical resources have the full advantage of mitigation measures, and treatment of historical resources can include documentation of the resource, avoidance measures, measures for preservation in place, and, as a last resort, data recovery for consequential information about the resource. If the archaeological cultural resource does not meet the definition of a historical resource, then the Lead Agency determines whether it meets the definition of a unique archaeological resource as defined in State CEQA Guidelines Section 21083.2(g). In practice, however, most archaeological sites that meet the definition of a unique archaeological resource will also meet the definition of a historical resource. Should the archaeological cultural resource meet the definition of a unique archaeological resource, it must be treated in accordance with State CEQA Guidelines Section 21083.2. If it can be demonstrated that a project will cause damage to a unique archaeological resource, the Lead Agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Treatments for archaeological resources can include, but are not limited to, avoidance measures, capping or covering sites adequately, or planning parks or open space to incorporate archaeological sites. If the archaeological cultural resource does not meet the definition of a historical resource or an archaeological resource, the effects to the resource are not considered significant effects on the environment (State CEQA Guidelines Section 15064.5(c)(4)).

California Health and Safety Code Sections 7050.5. California Health and Safety Code Section 7050.5 states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the Coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the Coroner's authority. If the human remains are of Native American origin, the Coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification. The NAHC will identify a Native American Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

California Register of Historical Resources (Pub. Res. Code Section 5020 *et seq*.). Public Resources Code establishes the State Historical Resources Commission and charges the State Historic Resources Commission with administration of the California Register of Historical Resources (California Register). State law protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources in CEQA documents. A cultural resource is an important historical resource if it meets any of the criteria found in State CEQA Guidelines Section

15064.5(a). These criteria are nearly identical to those for the National Register, which are listed above.

In coordination with the State Historic Resources Commission, the State Office of Historic Preservation (OHP) maintains the California Register. Properties listed on the National Register are automatically listed in the California Register. Properties formally designated eligible for listing on the National Register are nominated to the California Register and then selected to be listed on the California Register, as are State Landmarks and Points of Interest.

The California Register criteria are based on National Register criteria. For a property to be eligible for inclusion in the California Register, one or more of the following criteria must be met:

1. It is associated with the events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;

2. It is associated with the lives of persons important to local, California, or national history;

3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; and/or

4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition to meeting one or more of the above criteria, the California Register requires that sufficient time has passed since a resource's period of significance to "obtain a scholarly perspective on the events or individuals associated with the resource." Fifty years is used as a general estimate of time needed to develop the perspective to understand the resource's significance (California Code of Regulations § 4852[d][2]).

The California Register also requires that a resource possess integrity, which is defined as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance" (OHP 1999:2)[25]. To retain integrity, a resource should have its original location, design, setting, materials, workmanship, feeling, and association. Which of these factors is most important depends on the particular criterion under which the resource is considered eligible for listing.[26]

4.2.2.3 Regional Regulations

There are no regional regulations that are applicable to cultural resources relevant to the proposed project.

[25] California Office of Historic Preservation (OHP). 1999. California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register), OHP Technical Assistance Series #6.

[26] Ibid.

4.2.2.4 Local Regulations

Cypress General Plan. The Conservation/Open Space/Recreation (COSR) Element of the Cypress General Plan identifies goals and policies related to cultural resources (and includes references to paleontological resources). Goal COSR-5 is to "preserve Cypress' archaeologic and palaeontologic resources".[27] COSR-5.1 and COSR-5.2 were identified as policies in order to achieve Goal COSR-5. Policy COSR-5.1 is "to update records of resource finds and locations when required"[28] and COSR-5.2 states that "[p]rior to development in previously undeveloped areas, [the City will] require strict adherence to the CEQA guidelines for environmental documentation and mitigation measures where development will affect archaeological or paleontological resources."[29]

However, the City's General Plan does not identify any historic resources and does not contain any specific policies to protect historic resources. The COSR Element states that a record search was conducted by the Regional Information Center at UCLA on November 1, 1991, and yielded negative results for any recorded prehistoric or historic sites. This search also involved a review of maps from the years 1896, 1942, and 1943 which showed a high volume of development between 1896 and 1942. The COSR also states that the City contains no National Register listed or eligible properties, or State Landmarks.

4.2.3 Existing Environmental Setting

The area that is now Cypress (including the project site) was prehistorically occupied by the Gabrielino-Tongva Indian Tribe. The project site is an approximately 8.53-acre property located north of the intersection of Plaza Drive and Douglas Drive within an urbanized area. The project site is currently developed with a five-story office building and associated surface parking lot.

According to the Phase I ESA prepared for the project, historical aerial photographs indicate that the project site was used for light agricultural purposes from approximately 1938 to the late 1980s, with railroad tracks adjacent to the north. By 1994, the project site was developed with the existing office building, as well as commercial buildings to the north, east, and south. The railroad tracks were also no longer present in 1994. Additional commercial development was completed to the west and south of the project site by 2002. The project site and surrounding areas have largely remained the same since 2002.

4.2.4 Methodology

Historic maps, archival research, and aerial photographs of the project site were analyzed from the Phase I ESA to assess the potential for subsurface historic-period archaeological deposits at the project site.

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27 City of Cypress. 2001. Conservation/Open Space/Recreation Element. Website: https://www.cypressca.org/home/showpublisheddocument/686/636123123792970000 (accessed May 13, 2024).

28 Ibid.

29 Ibid.

4.2.5 Thresholds of Significance

The significance thresholds for impacts to cultural resources used in this analysis are consistent with Appendix G of the State CEQA Guidelines and the City's Initial Study/Environmental Checklist. The proposed project may be deemed to have a significant impact with respect to cultural resources if it would:

Threshold CUL-1: Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Threshold CUL-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Threshold CUL-3: Disturb any human remains, including those interred outside of dedicated cemeteries?

4.2.6 Project Impacts

Threshold CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Impact CUL-1: No Impact. According to the City of Cypress General Plan, there are no known archaeological resources located in Cypress. Further, the SCCIC record search results and field survey identified no previously recorded cultural resources on or in soils on the project site. As such, there are no historical resources as defined in State CEQA Guidelines Section 15064.5 located within the project site. The proposed project would not cause a substantial adverse change in the significance of a historical resource, and no mitigation is required.

Threshold CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Impact CUL-2: Less Than Significant with Mitigation Incorporated. As stated above in Threshold CUL-1, there are no known archaeological resources located in Cypress. There are no National Register listed or eligible properties or State landmarks in the City.[30]

The project site has been previously disturbed to construct an office building and a surface parking lot. The existing office building at the project site would be demolished, materials removed, and the entirety of the site would be graded for the construction of the proposed project. Although the site has been developed and used for nearly 100 years for various operations, there is evidence of a prehistoric presence of Native American tribes in the area. During site preparation/grading activities, there is the potential for inadvertent discovery of unknown archaeological resources.

[30] City of Cypress. General Plan. Conservation/Open Space/Recreation Element. Page COSR-7. Website: https://www.cypressca.org/home/showpublisheddocument/686/636123123792970000 (accessed May 13, 2024).

Mitigation Measure CUL-1 requires that a qualified professional archaeologist provide cultural resources awareness training prior to the commencement of ground-disturbing activities and that a qualified professional archaeologist be retained on-call in the event that construction personnel encounter any archaeological deposits and/or human remains during construction activities. If construction personnel encounter any archaeological deposits during construction activities, the on-call qualified professional archaeologist will be contacted to assess the nature of the find. When archaeological resources are assessed and/or protected as they are discovered, impacts to these resources would be less than significant. As such, implementation of **Mitigation Measure CUL-1** would reduce the impact of the proposed project on the significance of archaeological resources to less than significant.

Threshold CUL-3 **Would the project disturb any human remains, including those interred outside of dedicated cemeteries?**

Impact CUL-3: Less Than Significant Impact. Although no human remains are known to be on the project site or are anticipated to be discovered during project construction, due to ground disturbance there is a possibility of inadvertent discovery of human remains. Disturbing human remains could violate the State's Health and Safety Code as well as destroy the resource. **Regulatory Compliance Measure CUL-1** requires compliance with the State's Health and Safety Code for the treatment of human remains. Adherence to regulatory standards included in **Regulatory Compliance Measure CUL-1** would reduce the impact of the proposed project on human remains to less than significant. No mitigation is required.

4.2.7 Level of Significance Prior to Mitigation

No impacts to historical resources would occur. Prior to mitigation, the proposed project has the potential to result in significant impacts to unknown archaeological resources. With adherence to **Mitigation Measure CUL-1** and **Regulatory Compliance Measure CUL-1**, the project would result in less than significant impacts to previously undiscovered archaeological resources and/or human remains.

4.2.8 Mitigation Measures and Regulatory Compliance Measures

4.2.8.1 Mitigation Measures

Mitigation Measure CUL-1 **Unknown Archaeological Resources.** In the event that archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the Orange County List of Qualified Archaeologists has evaluated the find in accordance with federal, State, and local guidelines to determine whether the find constitutes a "unique archaeological resource," as defined in Section 21083.2(g) of the California Public Resources Code (PRC). The Applicant and its construction contractor shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the project site. Any found deposits shall be treated in accordance with federal, State and local guidelines, including those set forth in

PRC Section 21083.2, and shall be assessed, handled, and treated consistent with accepted standards, such as the Secretary of the Interior's standards and guidelines for archaeology and historic preservation. Prior to commencement of grading activities, the Director of the City of Cypress (City) Community Development Department, or designee, shall verify that all project grading and construction plans include specific requirements regarding California PRC (Section 21083.2[g]) and the treatment of archaeological resources as specified above.

4.2.8.2 Regulatory Compliance Measures

The following regulatory compliance measure is an existing regulation that is applicable to the proposed project and is considered in the analysis of potential impacts related to cultural resources. The City of Cypress considers this requirement to be mandatory; therefore, it is not a mitigation measure.

Regulatory Compliance Measure CUL-1

Cultural Resources Monitoring and Accidental Discovery, Human Remains. In the event that human remains are encountered on the project site, work within 50 feet of the discovery shall be redirected and the County Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the City of Cypress shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Prior to the issuance of grading permits, the Director of the City of Cypress Community Development Department, or designee, shall verify that all grading plans specify the

requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.

4.2.9 Level of Significance after Mitigation

No impacts to historical resources would occur. **Mitigation Measure CUL-1** would reduce potential impacts to unknown archaeological resources to a less than significant level. With adherence to the regulatory standards in **Regulatory Compliance Measure CUL-1**, the project would result in less than significant impacts to previously undiscovered buried human remains. No significant and unavoidable impacts to archaeological resources would occur with implementation of this mitigation measure. After mitigation has been implemented, all anticipated impacts to cultural resources would be considered less than significant.

4.2.10 Cumulative Impacts

Because impacts to cultural resources are typically site specific, the geographic scope of the proposed project for purposes of the cumulative impacts analysis would be the project site and the immediately surrounding area. The proposed project would have no impacts to historical resources. Therefore, when combined with the potential impacts of the past, present, and reasonably foreseeable projects identified in **Table 4.1, Summary of Cumulative Projects**, in Chapter 4.0 of this EIR, the proposed project would not contribute to cumulative impacts.

The cumulative projects all likely involved or would involve some level of ground disturbance with potential for inadvertent discovery of archaeological resources or human remains. As previously discussed, the proposed project would implement **Mitigation Measure CUL-1** in the case of accidental discovery of archaeological resources and **Regulatory Compliance Measure CUL-1** in the event human remains were accidentally discovered. Compliance with these measures would reduce any impacts to these resources associated with the proposed project to less than significant. Similarly, the cumulative projects would be required to comply with applicable laws and regulations pertaining to discovery of these resources. Accordingly, any cumulative impacts would be less than significant.

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4.3 ENERGY

This section discusses energy use resulting from implementation of the 5665 Plaza Drive Project (proposed project) and evaluates whether the proposed project would result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with any applicable plans for renewable energy and energy efficiency.

4.3.1 Scoping Process

The City received 3 comment letters during the public review period for the NOP. For copies of the NOP comment letters, refer to **Appendix A** of this EIR. None of the comment letters included comments related to energy.

4.3.2 Regulatory Setting

4.3.2.1 Federal Regulations

Energy Policy Act of 2005 (16 U.S.C. ch. 46 § 2601 *et seq.*; 42 U.S.C. ch. 134 § 13201 *et seq.*). The Energy Policy Act of 2005 seeks to reduce reliance on non-renewable energy resources and provide incentives to reduce current demand on these resources. For example, under the Act, consumers and businesses can obtain federal tax credits for purchasing fuel-efficient appliances and products (including hybrid vehicles), building energy-efficient buildings, and improving the energy efficiency of commercial buildings. Additionally, tax credits are available for the installation of qualified fuel cells, stationary microturbine power plants, and solar power equipment.

Corporate Average Fuel Economy Standards (49 CFR Parts 531, 533, 536, and 537). On March 31, 2022, the National Highway Traffic Safety Administration (NHTSA) finalized the CAFE standards for Model Years 2024–2026 Passenger Cars and Light Trucks. The amended CAFE standards would require an industry-wide fleet average of approximately 49 miles per gallon (mpg) for passenger cars and light trucks in model year 2026 by increasing fuel efficiency by 8 percent annually for model years 2024–2025, and 10 percent annually for model year 2026. The final standards are estimated to save about 234 billion gallons of gas between model years 2030 and 2050.

Safer Affordable Fuel-Efficient Vehicles Rule (85 Fed. Reg 24174 [April 30, 2020]). In August 2018, the NHTSA and the U.S. Environmental Protection Agency (USEPA) proposed *The Safer Affordable Fuel-Efficient* (SAFE) *Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks* (SAFE Vehicles Rule) to amend the CAFE and GHG emission standards established in 2012 for model years 2021 through 2026. The SAFE Vehicles Rule deceases fuel economy and withdraws the California Waiver for the California Advanced Clean Car program, Zero Emissions Vehicle mandate, and GHG emission standards for model years 2021 through 2026. the final SAFE Vehicles Rule was promulgated in April 2020.

4.3.2.2 State Regulations

Assembly Bill 1575, Warren-Alquist Act (Pub. Resources Code § 25000 *et seq.*). In 1975, largely in response to the oil crisis of the 1970s, the State Legislature adopted Assembly Bill (AB) 1575 (also known as the Warren-Alquist Act), which created the California Energy Commission (CEC). The statutory mission of the CEC is to forecast future energy needs; license power plants of

50 megawatts (MW) or larger; develop energy technologies and renewable energy resources; plan for and direct State responses to energy emergencies; and, perhaps most importantly, promote energy efficiency through the adoption and enforcement of appliance and building energy efficiency standards. AB 1575 also amended Public Resources Code (PRC) Section 21100(b)(3) and State CEQA Guidelines Section 15126.4 to require EIRs to include, where relevant, mitigation measures proposed to minimize the wasteful, inefficient, and unnecessary consumption of energy caused by a project. Thereafter, the State Resources Agency created Appendix F to the State CEQA Guidelines. Appendix F assists EIR preparers in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. Appendix F of the State CEQA Guidelines also states that the goal of conserving energy implies the wise and efficient use of energy and the means of achieving this goal, including (1) decreasing overall per capita energy consumption; (2) decreasing reliance on fossil fuels such as coal, natural gas, and oil; and (3) increasing reliance on renewable energy sources.

Senate Bill 1389, Energy: Planning and Forecasting (Pub. Resources Code § 25300 *et seq*.). In 2002, the State Legislature passed Senate Bill (SB) 1389, which required the CEC to develop an integrated energy plan every two years for electricity, natural gas, and transportation fuels for the California Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero emission vehicles (ZEVs) and their infrastructure needs, and encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

In compliance with the requirements of SB 1389, the CEC adopts an Integrated Energy Policy Report every two years and an update every other year. The most recently adopted report includes the *2023 Integrated Energy Policy Report.*[31] The *Integrated Energy Policy Report* covers a broad range of topics, including decarbonizing buildings, integrating renewables, energy efficiency, energy equity, integrating renewable energy, updates on Southern California electricity reliability, climate adaptation activities for the energy sector, natural gas assessment, transportation energy demand forecast, and the California Energy Demand Forecast. The *Integrated Energy Policy Report* provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs.

Renewable Portfolio Standards (SB 1078; Pub. Util. Code § 399.15). SB 1078 established the California Renewable Portfolio Standards program in 2002. SB 1078 initially required that 20 percent of electricity retail sales be served by renewable resources by 2017; however, this standard has become more stringent over time. In 2006, SB 107 accelerated the standard by requiring that the 20 percent mandate be met by 2010. In April 2011, SB 2 required that 33 percent of electricity retail sales be served by renewable resources by 2020. In 2015, SB 350 established tiered increases to the

[31] CEC. 2023. *2023 Integrated Energy Policy Report Update*. California Energy Commission. Docket Number 23-IEPR-01.

Renewable Portfolio Standards of 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. In 2018, SB 100 increased the requirement to 60 percent by 2030 and required that all State's electricity to come from carbon-free resources by 2045. SB 100 took effect on January 1, 2019.[32]

California Energy Code (Cal. Code Regs tit. 24). Energy consumption by new buildings in California is regulated by the Building Energy Efficiency Standards, in Part 6 of Title 24 of the California Code of Regulations (CCR), known as the Energy Code. The CEC first adopted the Building Energy Efficiency Standards for Residential and Nonresidential Buildings in 1978 in response to a legislative mandate to reduce energy consumption in the State. The Energy Code is updated every three years, with the most recent update consisting of the 2022 Energy Code that became effective on January 1, 2023. Mid-cycle supplements to the 2022 code will become effective on July 1, 2024. The efficiency standards apply to both new construction and rehabilitation of both residential and non-residential buildings, and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings, provided these standards meet or exceed those provided in the Energy Code.

California Green Building Standards Code (CALGreen Code)(Cal. Code Regs tit.24, pt. 11). In 2010, the California Building Standards Commission (CBSC) adopted Part 11 of the Title 24 Building Energy Efficiency Standards, referred to as the California Green Building Standards Code (CALGreen Code). The CALGreen Code took effect on January 1, 2011. The CALGreen Code is updated on a regular basis, with the most recent update consisting of the 2022 CALGreen Code standards that became effective January 1, 2023. The CALGreen Code established mandatory measures for residential and non-residential building construction and encouraged sustainable construction practices in the following five categories: (1) planning and design, (2) energy efficiency, (3) water efficiency and conservation, (4) material conservation and resource efficiency, and (5) indoor environmental quality. Although the CALGreen Code was adopted as part of the State's efforts to reduce GHG emissions, the CALGreen Code standards have co-benefits of reducing energy consumption from residential and non-residential buildings subject to the standard.

California Energy Efficiency Strategic Plan. On September 18, 2008, the California Public Utilities Commission (CPUC) adopted California's first Long-Term Energy Efficiency Strategic Plan, presenting a roadmap for energy efficiency in California (CPUC 2008). The Plan was updated in January 2011 (adopted by the CPUC in D.10-09-047). The Plan articulates a long-term vision and goals for each economic sector and identifies specific near-term, mid-term, and long-term strategies to assist in achieving those goals. The Plan also reiterates the following four specific programmatic goals known as the "Big Bold Energy Efficiency Strategies" that were adopted by the CPUC in Decisions D.07-10-032 and D.07-12-051:

- All new residential construction will be zero net energy (ZNE) by 2020.
- All new commercial construction will be ZNE by 2030.

[32] California Public Utilities Commission (CPUC). 2020. Renewables Portfolio Standard (RPS) Program. Website: https://www.cpuc.ca.gov/rps/ (accessed May 13, 2024).

- 50 percent of commercial buildings will be retrofitted to ZNE by 2030.
- 50 percent of new major renovations of State buildings will be ZNE by 2025.

4.3.2.3 Regional Regulations

There are no regional energy regulations that apply to the proposed project.

4.3.2.4 Local Regulations

Cypress Municipal Code. The City of Cypress has adopted the 2019 California Green Building Standards Code (CALGreen Code) and incorporated the CALGreen Code by reference into the City Municipal Code (Chapter 5, Buildings, Article 1, Building Code, Section 5-1 California Building Codes – Adopted).

Cypress General Plan Conservation/Open Space/Recreation Element. The following goals and policies are applicable to the proposed project:

COSR-3 Conserve energy resources through the use of available technology and conservation practices.

COSR-3.1 Encourage innovative site planning and building designs that minimize energy consumption by taking advantage of sun/shade patterns, prevailing winds, landscaping, and building materials.

COSR-3.2 Encourage new development and existing structures to install energy saving features.

4.3.3 Existing Environmental Setting

4.3.3.1 Electricity

Electrical power is a man-made resource. The production of electricity requires the consumption or conversion of energy resources (including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources) into energy. Electricity is used for a variety of purposes (e.g., lighting, heating, cooling, and refrigeration, and for operating appliances, computers, electronics, machinery, and public transportation systems).[33]

According to the most recent data available from the CEC, in 2022, total electricity generated in California was 287,220 gigawatt-hours (GWh), up 3.4 percent from 2021's total generation of 277,764 GWh.[34] The project site is within the service territory of Southern California Edison (SCE). SCE provides electricity to more than 15 million people in a 50,000-square-mile area of Central,

[33] United States Energy Information Administration (EIA). 2022. Electricity Explained. Website: https://www.eia.gov/energyexplained/electricity/ (accessed May 15, 2024).

[34] California Energy Commission (CEC). 2023. 2022 Total System Electric Generation. Website: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2022-total-system-electric-generation#:~:text=Highlights%20for%202022,(9%2C456%20GWh)%20from%202021. (accessed May 15, 2024).

Coastal, and Southern California.[35] According to the CEC, total electricity consumption in the SCE service area in 2022 was 85,870 GWh. Total electricity consumption in Orange County in 2022 was 20,243.7 GWh (20,243,721,856 kilowatt hours [kWh]).[36]

4.3.3.2 Natural Gas

Natural gas is a non-renewable fossil fuel. Fossil fuels form when layers of decomposing plant and animal matter are exposed to intense heat and pressure under the surface of the Earth over millions of years. Natural gas is a combustible mixture of hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas is found in naturally occurring reservoirs in deep underground rock formations. Natural gas is used for a variety of uses (e.g., heating buildings, generating electricity, and powering appliances such as stoves, washing machines and dryers, gas fireplaces, and gas grills).

Natural gas consumed in California is used for electricity generation (45 percent), residential uses (21 percent), industrial uses (25 percent), and commercial uses (9 percent). California continues to depend on out-of-state imports for nearly 90 percent of its natural gas supply.[37]

The Southern California Gas Company (SoCalGas) is the natural gas service provider for the project site. SoCalGas provides natural gas to approximately 21.8 million people in a 24,000 sq mi service area throughout Central and Southern California, from Visalia to the Mexican border.[38] According to the CEC, total natural gas consumption in the SoCalGas service area in 2022 was 5,026 million therms (1,646 million therms for the industrial sector). Total natural gas consumption in Orange County in 2022 was 572 million therms (352 million therms for the residential sector and 221 million therms for the non-residential sector).[39]

4.3.3.3 Petroleum/Transportation Energy

Petroleum is also a non-renewable fossil fuel. Petroleum is a thick, flammable, yellow-to-black mixture of gaseous, liquid, and solid hydrocarbons that occurs naturally beneath the earth's surface. Petroleum is primarily recovered by oil drilling. It is refined into a large number of consumer products, primarily fuel oil, gasoline, and diesel.

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35 Southern California Edison (SCE). Fact Sheets. Website: https://newsroom.edison.com/fact-sheets/fs (accessed May 15, 2024).

36 CEC. 2019a. California Energy Consumption Database. Website: http://www.ecdms.energy.ca.gov/ (accessed May 15, 2024).

37 CEC. 2021c. Supply and Demand of Natural Gas in California. Website: https://www.energy.ca.gov/data-reports/energy-almanac/californias-natural-gas-market/supply-and-demand-natural-gas-california (accessed May 15, 2024).

38 Southern California Gas Company (SoCalGas). 2020. About SoCalGas. Website: https://www3.socalgas.com/about-us/company-profile (accessed May 15, 2024).

39 CEC. 2019b. Gas Consumption by County. Website: http://www.ecdms.energy.ca.gov/gasbycounty.aspx (accessed May 15, 2023).

The average fuel economy for light-duty vehicles (autos, pickups, vans, and sport utility vehicles) in the United States has steadily increased from about 14.9 miles per gallon (mpg) in 1980 to 22.9 mpg in 2020.[40] Federal fuel economy standards have changed substantially since the Energy Independence and Security Act was passed in 2007. This act, which originally mandated a national fuel economy standard of 35 mpg by year 2020,[41] applies to cars and light trucks of Model Years 2011 through 2020. In March 2020, the United States Environmental Protection Agency and National Highway Traffic Safety Administration (NHTSA) finalized the Corporate Average Fuel Economy (CAFE) standards for Model Years 2024–2026 Passenger Cars and Light Trucks, further detailed below.

Gasoline is the most used transportation fuel in California, with 97 percent of all gasoline being consumed by light-duty cars, pickup trucks, and sport utility vehicles. According to the most recent data available, total gasoline consumption in California was 319,514 thousand barrels or 1,613.5 trillion British thermal units (BTU) in 2021.[42] Of the total gasoline consumption, 302,881 thousand barrels or 1,529.5 trillion BTU were consumed for transportation.[43] Based on fuel consumption obtained from EMFAC2021, 157.1 million gallons of diesel and 1.2 billion gallons of gasoline are estimated to be consumed from vehicle trips in Orange County in 2024.

4.3.4 Methodology

The energy use analysis discussed in this section is based on information from the CalEEMod version 2022.1. modeling results provided in **Appendix C** of this Draft EIR. Operational fuel consumption (diesel fuel and gasoline) from vehicle trips was estimated for the proposed project based on vehicle trip estimates from CalEEMod and fuel efficiencies from the CARB's EMFAC2021 model. Estimates of fuel consumption (diesel fuel and gasoline) from construction trucks and construction worker vehicles were based on trip estimates from CalEEMod and fuel efficiencies from the CARB EMFAC2021 model.

The analysis focuses on the four sources of energy that are relevant to the proposed project: electricity, natural gas, the equipment fuel necessary for project construction, and vehicle fuel necessary for project operations. To assist in the analysis and provide context, the amount of electricity, natural gas, construction fuel, and fuel use from operations are quantified and compared to that consumed in Orange County as a whole. The electricity/natural gas use of the proposed project is analyzed as a whole on an annual basis.

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40 United States Department of Transportation (USDOT). "Table 4-23: Average Fuel Efficiency of U.S. Light Duty Vehicles." Website: https://www.bts.dot.gov/bts/bts/content/average-fuel-efficiency-us-light-duty-vehicles (accessed May 13, 2024).

41 United States Department of Energy. 2007. "Energy Independence & Security Act of 2007." Website: https://www.afdc.energy.gov/laws/eisa (accessed May 13, 2024).

42 A British thermal unit is defined as the amount of heat required to raise the temperature of one pound of water by one degree Fahrenheit.

43 U.S. Energy Information Administration (EIA). 2020. California State Profile and Energy Estimates. Table F3: Motor gasoline consumption, price, and expenditure estimates, 2017. Website: eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_mg.html&sid=CA (accessed May 13, 2024).

4.3.5 Thresholds of Significance

The thresholds for energy impacts used in this analysis are consistent with Appendix G of the State CEQA Guidelines and the City's Initial Study/Environmental Checklist. The proposed project may be deemed to have a significant impact with respect to energy if it would:

Threshold ENG-1 Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Threshold ENG-2 Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

4.3.6 Project Impacts

Threshold ENG-1: Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impact ENG-1: Less Than Significant Impact. Implementation of the proposed project would increase the demand for energy through day-to-day operations and fuel consumption associated with construction activities. This section discusses energy use resulting from implementation of the proposed project and evaluates whether the proposed project would result in the wasteful, inefficient, or unnecessary consumption of energy resources.

Construction Energy Demands. Construction of the proposed project is anticipated to last approximately 11 months, including a 60-day demolition period, and would require energy for the manufacture and transportation of construction materials, worker commutes, preparation of the site for grading and building activities, and construction of the proposed building. All or most of this energy would be derived from non-renewable resources. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities. Construction of the proposed project would not involve the consumption of natural gas because none of the construction-related equipment would be powered by natural gas. Electricity would be used onsite for lighting, operating construction office equipment, and in use of smaller power tools.

Construction activities are not anticipated to result in an inefficient use of energy because gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the proposed project. Energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. The proposed project would not necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or State. Demolition of the existing buildings and infrastructure onsite would consist of primality of demolition materials which can be recycled. Construction activities would comply with all existing regulations, as required through the City's development permitting process, and would not use large amounts of energy or fuel in a wasteful, inefficient, or unnecessary manner. Therefore, the proposed construction activities would not be considered to be wasteful.

Operational Energy Demands. Energy use consumed by the proposed project would be associated with natural gas use, electricity consumption, and fuel used for vehicle and truck trips associated with the project.

CalEEMod divides building electricity use into uses that are subject to Title 24 standards and those that are not. For electricity, Title 24 uses include the major building envelope systems covered by Part 6 (California Energy Code) of Title 24 (e.g., space heating, space cooling, water heating, and ventilation). Non-Title 24 uses include all other end uses (e.g., appliances, electronics, and other miscellaneous plug-in uses). Because some lighting is not considered as part of the building envelope energy budget, CalEEMod considers lighting as a separate electricity use category.

As described above, the proposed project would result in energy usage associated with gasoline and diesel to fuel project-related trips. Trip generation rates used in CalEEMod for the proposed project were based on the project's trip generation estimates identified in the proposed project's Traffic Analysis (provided in **Appendix E** of this EIR).[44] The proposed project would generate a total of 406 average daily trips (ADT), including 262 passenger vehicle trips, 50 two-axle truck trips, 16 three-axle truck trips, and 78 four-axle truck trips, all of which were included in CalEEMod.

Table 4.3.1 provides the proposed project's estimated annual operational energy usage. The electricity and natural gas rates are from the CalEEMod analysis, while the gasoline and diesel rates are based on the Traffic Analysis in conjunction with United States Department of Transportation (USDOT) fuel efficiency data.

Table 4.3.1: Estimated Annual Energy Use

Land Use	Electricity Use (kWh per year)	Natural Gas Use (therms per year)	Gasoline Consumption (gallons per year)	Diesel Consumption (gallons per year)
Existing Uses				
General Office Building	671,059	**9,545**	**40,436**	**26,013**
Proposed Project				
Refrigerated Warehouse	3,701,189	47,952	33,938	158,778
Parking Lot	76,317	-	-	-
Total Project Energy Usage	**3,777,506**	**47,952**	**33,938**	**158,778**
Total Net Energy Usage	**3,106,447**	**38,407**	**-6,498**	**132,765**

Source: Compiled by LSA (June 2024).
kWh = kilowatt-hour(s)

As shown in **Table 4.3.1**, the estimated potential net increase in electricity demand associated with the operation of the proposed project is 3,106,447 kWh per year. Total electricity consumption in Orange County in 2022 was 20,243.7 GWh or 20,243,721,856 kWh. Therefore, operation of the proposed project would increase the annual electricity consumption in Orange County by less than 0.1 percent.

[44] Urban Crossroads. 2023. *Goodman Commerce Center Traffic Analysis*. November 21, 2023.

Also as shown in **Table 4.3.1**, the estimated potential net increase in natural gas demand associated with the proposed project is 38,407 therms per year. Total natural gas consumption in Orange County in 2022 was 572 million therms (572,454,744 therms). Therefore, operation of the proposed project would negligibly increase the annual natural gas consumption in Orange County by less than 0.1 percent.

Although there would be an overall increase in energy demand associated with the proposed project, the CALGreen Code (California Code of Regulations, Title 24, Part 11), sets performance standards for nonresidential development to reduce environmental impacts and encourage sustainable construction practices. The CALGreen Code addresses energy efficiency, water conservation, materials conservation, planning and design, and overall environmental quality. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Standards Code that became effective on January 1, 2023.

The project would be required to adhere to all federal, State, and local requirements for energy efficiency, including current Title 24 and CALGreen Code standards which establish minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting, which would reduce energy usage. In addition, proposed new development would be constructed using energy efficient modern building materials and construction practices, and the proposed project also would use new modern appliances and equipment, in accordance with the Appliance Efficiency Regulations (Title 20, CCR Sections 1601 through 1608). Title 24 includes requirements for reductions in energy consumption and increasing energy efficiency. Title 24 now has solar installation requirements for all newly constructed non-residential projects. The CBC now mandates incorporation of solar photovoltaic systems and battery storage in many non-residential projects, or for non-qualifying projects installation of solar-ready roofs and systems. These requirements serve to offset electricity demand and the project will be required to adhere to applicable Title 24 requirements. The proposed project's compliance with Title 24 will be confirmed prior to issuance of building permits. The expected energy consumption during construction and operation of the proposed project would be consistent with typical usage rates for industrial uses. In addition, the proposed project would be required to comply with Regulatory Compliance Measure EN-1 which would reduce energy usage on the project site during construction through reducing truck idling times. With implementation of **Regulatory Compliance Measure EN-1**, impacts to energy resources during project construction would be less than significant, and no mitigation is required.

In addition, the proposed project would result in energy usage associated with gasoline and diesel to fuel project-related trips. The average fuel economy for light-duty vehicles (automobiles, pickups, vans, and sport utility vehicles) in the United States has steadily increased, from about 14.9 mpg in 1980 to 22.9 mpg in 2020.[45] The average fuel economy for heavy-duty trucks in the United States

[45] United States Department of Transportation (USDOT). 2021. Table 4-23: Average Fuel Efficiency of U.S. Light Duty Vehicles. Website: www.bts.gov/content/average-fuel-efficiency-us-light-duty-vehicles (accessed May 13, 2024).

has also steadily increased, from 5.7 mpg in 2013 to a 8.0 mpg in 2021.[46] Therefore, using the USEPA fuel economy estimates for 2020, the California diesel fuel economy estimates for 2021, and the traffic data from the Traffic Analysis prepared for the proposed project, the proposed project is estimated to result in the net decrease of approximately 6,498 gallons of gasoline and the net increase of approximately 132,401 of diesel fuel per year from existing conditions. Based on fuel consumption obtained from EMFAC2021, 157.1 million gallons of diesel and 1.2 billion gallons of gasoline are anticipated to be consumed from vehicle trips in Orange County in 2024. Therefore, vehicle and truck trips associated with the proposed project would not increase the annual gasoline fuel use in Orange County and would increase the annual diesel fuel use by approximately 0.1 percent in Orange County. Therefore, operation of the proposed project would represent a very small percentage of the annual gasoline and diesel fuel consumption in Orange County.

Vehicles associated with trips to and from the project site would be subject to fuel economy and efficiency standards, which are applicable throughout the State. As such, the fuel efficiency of vehicles associated with project operations would increase throughout the life of the proposed project. Therefore, implementation of the proposed project would not result in a substantial increase in transportation-related energy uses. The proposed project would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy and would incorporate renewable energy or energy efficiency measures into building design, equipment uses, and transportation. Impacts would be less than significant, and no mitigation measures would be necessary.

Threshold ENG-2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact ENG-2: Less Than Significant Impact. In 2002, the Legislature passed Senate Bill (SB) 1389, which required the CEC to develop an integrated energy plan every two years for electricity, natural gas, and transportation fuels for the California Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero emission vehicles and their infrastructure needs, and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

The CEC recently adopted the *2023 Integrated Energy Policy Report*[47] that provides the results of the CEC's assessments of a variety of energy issues facing California. The City of Cypress relies on the State's integrated energy plan and does not have its own local plan to address renewable energy or energy efficiency.

As indicated above, energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the overall use in the County. In addition,

[46] CEC. 2015. Medium and Heavy-Duty Truck Prices and Fuel Economy 2013–2026. Website: efiling.energy.ca.gov/getdocument.aspx?tn=206180 (accessed May 13, 2024).

[47] CEC. 2023. *2023 Integrated Energy Policy Report Update*. Docket No. 23-IEPR-01.

energy usage associated with operation of the proposed project would be relatively small in comparison to the overall use in Orange County and the State's available energy sources. Therefore, energy impacts at the regional level would be negligible. Because California's energy conservation planning actions are conducted at a regional level, and because the proposed project's total impact on regional energy supplies would be minor, the proposed project would not conflict with or obstruct California's energy conservation plans as described in the CEC's Integrated Energy Policy Report. Additionally, as demonstrated above, the proposed project would not result in the inefficient, wasteful, and unnecessary consumption of energy. Potential impacts related to conflict with or obstruction of a State or local plan for renewable energy or energy efficiency would be less than significant, and no mitigation is required.

4.3.7 Level of Significance Prior to Mitigation

Energy impacts related to the inefficient, wasteful, and unnecessary consumption of energy are considered less than significant, and no mitigation is required.

4.3.8 Regulatory Compliance Measures and Mitigation Measures

4.3.8.1 Regulatory Compliance Measures

The following regulatory compliance measure includes existing regulations that are applicable to the proposed project and are considered in the analysis of potential impacts related to energy. The City of Cypress considers these requirements to be mandatory; therefore, they are not mitigation measures.

Regulatory Compliance Measure EN-1 **Limit Idling Time.** The Applicant and construction contractor would be required to comply with applicable idling regulations for on-road vehicles during project construction and operation, which require truck drivers to turn off their engines within five minutes of idling.

4.3.8.2 Mitigation Measures

No mitigation is required for the proposed project.

4.3.9 Level of Significance after Mitigation

Construction and operational impacts related to energy use would be less than significant. No mitigation is required.

4.3.10 Cumulative Impacts

The geographic area for cumulative analysis of electricity is that of the SCE service area, while the geographic area for cumulative analysis of natural gas service is that of the SoCalGas service area. Construction and operation of the proposed project would result in an increased demand for electricity and natural gas service. However, this increase would be minimal and would not require SCE to expand or construct infrastructure that could cause substantial environmental impacts. The proposed project would not result in the demand for natural gas during construction; however, operation of the proposed project would increase on-site natural gas demand. As discussed previously, the estimated potential net increase in electricity demand associated with the operation

of the proposed project is 3,106,447 kWh per year. Total electricity consumption in Orange County in 2022 was 20,243.7 GWh or 20,243,721,856 kWh and operation of the proposed project would increase the annual electricity consumption in Orange County by less than 0.1 percent. By 2030, consumption in Orange County is anticipated to increase by 12,000 GWh for the low-demand scenario and by 22,000 GWh for the high-demand scenario.[48] While this forecast represents a large increase in electricity consumption, the proposed project's share of cumulative consumption would be negligible. Energy use associated with the proposed project, in combination with energy use from the cumulative projects, would be within SCE's system-wide net annual increase in electricity supplies over the 2018 to 2030 period, and there are sufficient planned electricity supplies in the region for estimated net increases in energy demands.

The estimated potential net increase in natural gas demand associated with proposed project operations is 38,407 therms per year. Development of the cumulative projects is not anticipated to require additional natural gas infrastructure or result in a substantial increase in demand. Total natural gas consumption in the SoCalGas service area in 2022 was 5,026 million therms (1,646 million therms for the industrial sector). Total natural gas consumption in Orange County in 2022 was 572 million therms (352 million therms for the residential sector and 221 million therms for the non-residential sector).[49] Per SoCalGas's forecast, total natural gas consumption in the SoCalGas service area is expected to remain steady through 2030 for low- and mid-demand scenarios and to increase by approximately 650 million therms under a high-demand scenario due to intense energy efficiency efforts.[50] Proposed project operations would negligibly increase the annual natural gas consumption in Orange County by less than 0.1 percent. It is anticipated that SoCalGas would be able to meet the natural gas demand of the proposed project and the cumulative projects without the need to develop additional facilities. In addition, both SCE and SoCalGas demand forecasts include the growth contemplated by the proposed project and the cumulative projects within their respective service areas. Increased energy efficiency to comply with building energy efficiency standards would reduce energy consumption on a per-square-foot basis. Furthermore, utility companies are required to increase their renewable energy sources to meet the Renewable Portfolio Standards mandate of 60 percent renewable supplies by 2030. SCE and SoCalGas plan to continue to provide reliable service to their customers and upgrade their distribution systems as necessary to meet future demand.

In addition, the proposed project would include energy usage associated with gasoline and diesel to fuel project-related trips. The proposed project is estimated to result in a net decrease of approximately 6,498 gallons of gasoline and a net increase of approximately 132,401 of diesel fuel per year compared to existing conditions. However, those figures are based on existing average

[48] CEC. 2018. *California Energy Demand, 2018–2030 Revised Forecast*. Publication Number: CEC-200-2018-002-CMF. February. Website: https://efiling.energy.ca.gov/getdocument.aspx?tn=223244 (accessed May 13, 2024).

[49] CEC. 2019b. Gas Consumption by County. Website: http://www.ecdms.energy.ca.gov/gasbycounty.aspx (accessed May 13, 2024).

[50] CEC. 2018. *California Energy Demand, 2018–2030 Revised Forecast*. Publication Number: CEC-200-2018-002-CMF. February. Website: https://efiling.energy.ca.gov/getdocument.aspx?tn=223244 (accessed May 13, 2024).

truck fleet demands, which are anticipated to decrease with improvements in heavy duty engine efficiency and transitions to electrification, consistent with regulatory requirements such as the California Advanced Clean Truck Rule. The project would be designed to facilitate achievement of those goals and would not obstruct their implementation. Based on fuel consumption data obtained from EMFAC2021, 157.1 million gallons of diesel and 1.2 billion gallons of gasoline are anticipated to be consumed from vehicle trips in Orange County in 2024. Therefore, vehicle and truck trips associated with the proposed project would not increase the annual gasoline fuel use in Orange County and would increase the annual diesel fuel use by approximately 0.1 percent in Orange County. Therefore, operation of the proposed project would represent a very small percentage of the annual gasoline and diesel fuel consumption in Orange County.

Compliance with **Regulatory Compliance Measure EN-1** would help ensure that the proposed project does not result in an inefficient, wasteful, and unnecessary consumption of energy. Therefore, the proposed project's contribution to impacts related to the inefficient, wasteful, and unnecessary consumption of energy would not be cumulatively considerable, and no mitigation is required.

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4.4 GEOLOGY AND SOILS

This section provides a discussion of the existing geology and soils setting and an analysis of the 5665 Plaza Drive Project's (proposed project) potential geology and soils impacts. This section also addresses potential impacts due to the local geology underlying the project site, as well as slope stability, ground settlement, soil conditions, grading, and regional and local seismic conditions. This section also evaluates potential impacts to paleontological resources. This section summarizes information provided in the *Geotechnical Investigation and Report Update for Proposed Goodman Commerce Center, 5665 and 5757 Plaza Drive* (Geotechnical Evaluation), conducted by G3SoilWorks in August 2023, and provided in **Appendix F** of this Draft EIR. This section also incorporates data from the City of Cypress General Plan,[51] numerous State and federal studies of geologic and seismic hazards in the vicinity of the City, site-specific investigations in the project site, and field observations.

4.4.1 Scoping Process

The City received 3 comment letters during the public review period for the NOP. For copies of the NOP comment letters, refer to **Appendix A** of this Draft EIR. None of the comment letters included comments related to geology.

4.4.2 Regulatory Setting

4.4.2.1 Federal Regulations

There are no federal policies or regulations related to geology and soils that are applicable to the proposed project.

4.4.2.2 State Regulations

Alquist-Priolo Earthquake Fault Zoning Act (1972) (Pub. Resources Code § 2621 *et seq*.). The Alquist-Priolo Earthquake Fault Zoning Act of 1972 and updates (Pub. Resources Code, Section 2621, *et seq.)* is the principal California State guidance to prevent the construction of habitable structures on the surface trace of active earthquake faults. If an active fault is found, a structure for human occupancy must be set back from the fault (generally 50 feet). The Alquist-Priolo Earthquake Fault Zoning Act only addresses the hazard of surface fault rupture; it does not consider other earthquake hazards. There are no known earthquake fault zones on or in the near vicinity of the project site; therefore, regulations recommended by the California Geological Survey (CGS) for investigations conducted in such zones do not specifically apply.

Seismic Hazard Mapping Act (1990) (Pub. Resources Code §§ 2690-2699.6). The Seismic Hazard Mapping Act (SHMA) was adopted by the State in 1990 to address the potential hazards posed by secondary effects of seismic activity, including strong ground shaking, soil liquefaction, and associated ground failure and seismically induced landslides. The CGS prepares and provides local governments with seismic hazard zone maps that identify areas susceptible to amplified shaking, liquefaction, earthquake-induced landslides, and other ground failures. The seismic hazard zones are referred to as "zones of required investigation" because site-specific geological investigations are required for construction projects located within these areas. Before a project can be permitted, a

[51] City of Cypress. 2001. General Plan City of Cypress General Plan, Safety Element.

geologic investigation, evaluation, and written report must be prepared by a licensed geologist to demonstrate that the potential hazards can be successfully mitigated.

Public Resources Code. Section 5097.5 of the PRC provides for the protection of cultural and paleontological resources and prohibits the removal, destruction, injury, or defacement of archaeological and paleontological features on any lands under the jurisdiction of State or local authorities.

4.4.2.3 Regional Regulations

There are no regional policies or regulations related to geology and soils that are applicable to the proposed project.

4.4.2.4 Local Regulations

City of Cypress Municipal Code. Building and construction in the City are subject to the regulations of the City of Cypress Municipal Code. California Code of Regulations (CCR), Title 24, Part 2, the California Building Code (CBC) (2019), provides minimum standards for building design in the State. Local codes are permitted to be more restrictive than Title 24, but not less restrictive. The procedures and limitations for the design of structures are based on site characteristics, occupancy type, configuration, structural system height, and seismic design category. The seismic ratings used in the CBC are derived from the International Building Code specifications. Most of coastal Southern California, including the project site, is located in Seismic Design Category D. Construction activities are subject to occupational safety standards for excavation, shoring, and trenching as specified in the California Occupational Safety and Health Administration (Cal/OSHA) regulations (CCR, Title 8). In addition, the proposed project would adhere to the regulatory standards described in Regulatory Compliance Measure GEO-1, provided below, which includes the seismic and building standards in the City's Building Code, that adopt the CBC with amendments and modifications.

City of Cypress General Plan Conservation/Open Space/Recreation Element. The existing City of Cypress General Plan identifies goals and policies related to paleontological resources. Goal COSR-5 in the Conservation/Open Space/Recreation Element (2000) of the City's General Plan addresses paleontological resources (and potential resources) and indicates that conservation of the resources and investigation of potential resource areas is an important undertaking for connecting with the community's past.

The following goal and policies apply to the proposed project:

COSR-5 Preserve Cypress' archaeologic and paleontological resources.

COSR-5.1 Update records of resource finds and locations when required.

COSR-5.2 Prior to development in previously undeveloped areas, require strict adherence to the CEQA guidelines for environmental documentation and mitigation measures where development will affect archaeological or paleontological resources.

4.4.3 Existing Environmental Setting

4.4.3.1 Project Site

According to the Geotechnical Evaluation, the topography of the site is relatively flat to very gently sloping. Site elevations in feet above the North American Vertical Datum of 1988 (NAVD88) are estimated to range from approximately 38 feet above mean sea level (amsl) near the northeast and southeast corners of the site, approximately 39 feet amsl near the center of the site, and approximately 35–36 feet amsl near the northwest and southwest corners of the site, respectively.

4.4.3.2 Regional Geology

The project site is located within the Los Angeles Basin, a northwest-trending alluviated lowland situated at the north end of the Peninsular Ranges geomorphic province of coastal Southern California. The Los Angeles Basin is subdivided into four primary structural blocks that are distinguished from one another by contrasting basement rock types and stratigraphy. More specifically, the project site is located within the east-central portion of the Downey Plain, a broad lowland area that comprises a large portion of the Central Block of the Los Angeles Basin. This plain is bounded by the Santa Monica Mountains to the north, the Puente Hills and Santa Ana Mountains to the northeast and east, and a northwest-trending alignment of hills and mesas to the west and southwest.

In the area of the project site, the soils that form this extensive alluvial plain are composed primarily of geologically young materials deposited as a result of sedimentation along the Santa Ana and San Gabriel Rivers, with additional materials contributed from smaller canyons that drain the adjoining upland areas to the northeast.

4.4.3.3 Local Geology and Subsurface Conditions

The area occupied by the southern portion of the City of Cypress is underlain by unconsolidated, generally fine-grained, Holocene-age alluvial floodplain deposits composed primarily of various combinations of silt, sand, and clay. Underlying these Holocene alluvial deposits are older, semiconsolidated to consolidated Quaternary-age sediments that extend to depths of 2,700 feet to greater than 4,200 feet below the surface.

The subsurface investigation revealed that the project site is generally underlain with shallow fills and Quaternary alluvial deposits. Borings at the project site encountered Artificial fill within the upper 5 feet below ground surface, consisting of dark grayish brown, moist to very moist, medium-dense, silty sands. Native alluvial materials were encountered at depths below 5 feet below ground surface, consisting of very moist to wet silty sands / sandy silts with interbeds / discontinuous lenses of clayey silt. Silty clay and poorly graded sands were encountered between depths of 35 and 40 feet below ground surface.

4.4.3.4 Local Groundwater Conditions

Information pertaining to the occurrence of groundwater within inland portions of Orange County has primarily been obtained from borehole logs prepared during installation of the numerous water wells throughout the area. In the City and surrounding areas, groundwater may occur within the upper 40 to 50 feet of Holocene-age sediments. This water typically occurs within thin layers of silty sand and sand at depths of between 5 and 50 feet below the surface.

According to the Geotechnical Evaluation, groundwater was encountered at depths of 6 to 9 feet below the ground surface, indicating the presence of shallow groundwater conditions at the project site. Borings B-1 through B-5 encountered groundwater at depths 7 to 8 feet below ground surface, which is consistent with previous investigations conducted by Southern California Geotechnical (SCG), reporting groundwater depths from 5 to 9.5 feet at various boring locations. In 2022, groundwater monitoring wells were installed at depths of 6.4 to 8.8 feet below ground surface which indicated fluctuating water levels, with shallow groundwater conditions persisting across the site. During periods of heavy rainfall or "wet" rainy seasons, the groundwater elevation may rise, potentially resulting in mounding in areas of concentrated influx.

4.4.3.5 Fault Systems and Seismic Conditions

A potentially active fault is defined by the State as a fault with a history of movement within Pleistocene time (between 11,000 and 1.6 million years ago [Ma]). The active and potentially active faults are capable of producing potentially strong seismic shaking at the project site. It is anticipated that the project site will periodically experience ground acceleration as a result of earthquakes. The closest mapped active faults to the project site include the Newport-Inglewood and Whittier fault zones located approximately 5.1 miles southwest and 11.6 miles northeast of the project site, respectively.

No portion of the project site or larger study area in the Geotechnical Evaluation is located within the boundaries of an “Earthquake Fault Zone,” as defined by the State of California in the Alquist-Priolo Earthquake Fault Zoning Act. Furthermore, the Cypress General Plan Safety Element (2001) indicates that no active faults have been identified within City boundaries.

Seismic shaking is characterized by the physical movement of the land surface during and subsequent to an earthquake. Seismic shaking has the potential to cause destruction and damage to buildings and property, including damage resulting from damaged or destroyed gas or electrical utility lines, disruption of surface drainage, blockage of surface seepage and groundwater flow, changes in groundwater flow, dislocation of street alignments, displacement of drainage channels and drains and possible loss of life. In addition, ground shaking can induce several kinds of secondary seismic effects, including liquefaction, differential settlement, and landslides.

The intensity of seismic shaking during an earthquake depends largely on the geologic foundation conditions of the materials composing the upper several hundred feet of the Earth’s surface. The greatest amplitudes and longest durations of ground shaking occur on thick, water-saturated, unconsolidated alluvial sediments, which may lead to liquefaction (as further described below). Ground shaking can also cause ground failure or deformation due to lurching and liquefaction.

Surface fault rupture refers to the displacement of the ground surface along a fault, which can occur during strong earthquakes. The potential for seismic hazards at the project site is a consequence of ground shaking caused by events on nearby active faults. However, as previously discussed, the project site is not located within a designated Alquist-Priolo Earthquake Fault Zone, so the possibility for surface fault rupture is low. The project site is, however, located approximately 5.1 miles to the northeast of an earthquake fault zone that has been established around the active traces of the Newport-Inglewood Fault.

4.4.3.6 Liquefaction and Lateral Spreading

Liquefaction occurs when saturated, cohesionless soils temporarily lose shear strength (liquefy) due to increased pore water pressures induced by strong ground motion during an earthquake. Intervals of loose sand may, therefore, be subject to liquefaction if these materials are or were to become submerged and also exposed to strong seismic ground shaking. Seismic ground shaking of relatively loose, granular soils that are saturated or submerged can cause the soils to liquefy and temporarily behave as a dense fluid. This loss of support can produce local ground failure such as settlement or lateral spreading that may damage overlying improvements.

Lateral spreading typically occurs as a form of horizontal displacement of relatively flat-lying alluvial material toward an open or "unconfined" face such as an open body of water, channel, or excavation. In soils, this movement is generally due to failure along a weak plane and is often associated with liquefaction. The Safety Element of the City's General Plan also identifies the project site as an area at a potentially high risk of liquefaction.

As discussed in the Geotechnical Evaluation, the project site is located in Liquefaction Hazards Zone of required investigations. Subsurface explorations found the presence of potentially liquefiable soils to depths of 50 feet, indicating the potential for dynamic settlements ranging from 2.90 inches to 5.27 inches during severe seismic events. Given the nature and size of the proposed development, differential settlements under current conditions could be significant.

4.4.3.7 Subsidence

The phenomenon of widespread land sinking, or subsidence, is generally related to substantial over pumping of groundwater or petroleum reserves from deep underground reservoirs. Like most of northern Orange County, the City lies atop the Orange County Groundwater Basin (Orange County Basin). Although slight subsidence has been observed elsewhere in the Orange County Basin in Santa Ana (likely due to groundwater withdrawal) and in the Huntington Beach area (likely due to oil withdrawal), there is no recent history of subsidence in the project vicinity.[52] Groundwater levels and storage in the Orange County Basin are managed by the Orange County Water District (OCWD) in a manner that reduces the potential for land subsidence to occur.

4.4.3.8 Compressible/Collapsible Soils

Compressible soils are soils that consolidate when exposed to new loading, such as Artificial Fill or foundation loads. Soil collapse occurs when soils substantially decrease in volume following an increase in moisture content. The results of the subsurface investigation within the project site, as well as investigations conducted for previous reports, indicated that the majority of the project site is underlain by artificial fill in the upper to 5 feet below the surface. Native alluvial soils were encountered below approximately 5 feet below ground surface and generally consisted of interbedded layers of sandy silts with discontinuous lenses of clayey silt. A distinct widespread layer of clayey silt/silty clay was encountered at depths between 15 feet and 32 feet, in Borings B-1

[52] Metropolitan Water District of Southern California. 2007. Groundwater Assessment Study, Chapter IV – Groundwater Basin Reports, Orange County Basins – Orange County Basin, September.

through B-5. At depths between 35 to 40 feet poorly graded sands noted were encountered at the boring locations.

4.4.4 Methodology

To assess the impacts of the proposed project with respect to geologic and soil conditions, G3SoilWorks conducted a Geotechnical investigation and field explorations in May 2022. Additionally previous studies for the proposed project were performed by SCG in June 2021. The discussion below describes the scope of the exploration, including methods used during site reconnaissance and the results of pertinent prior explorations, laboratory tests, and engineering analyses.

4.4.4.1 Background Research and Data Review

Existing geologic literature (i.e., geologic maps, boring logs, and other applicable data) was reviewed by G3SoilWorks.

4.4.4.2 Site Reconnaissance

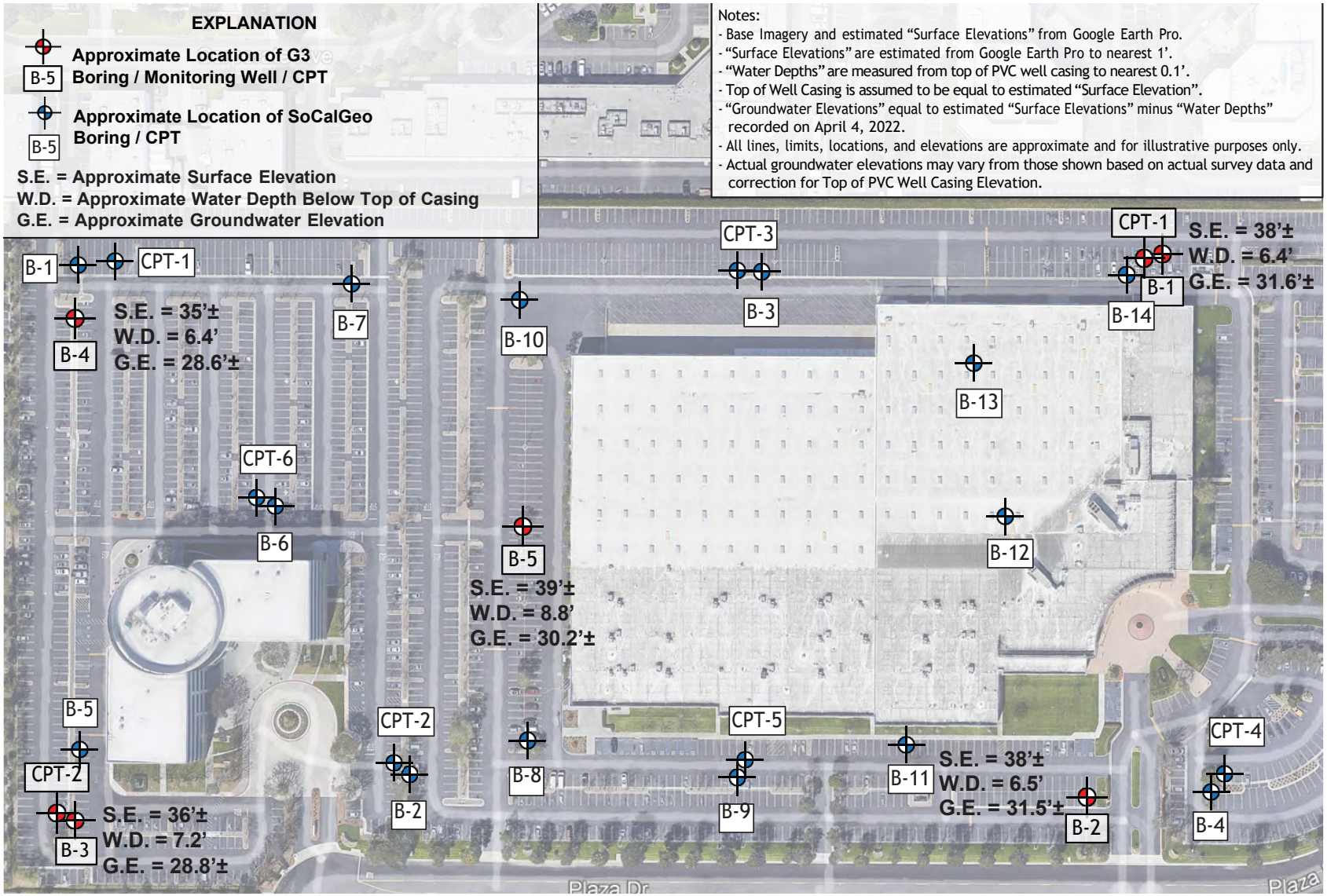
A site reconnaissance and a subsurface exploration of the project site were conducted by G3SoilWork. This included marking exploration and test locations for geology and soils that were analyzed in the Geotechnical Evaluation.

4.4.4.3 Geotechnical Laboratory Testing/Analysis

A field investigation was conducted by G3SoilWorks to identify subsurface conditions on the project site related to soil types, groundwater, liquefaction, corrosive soils, settlement, and the potential need for remedial grading. As part of these field investigations, a total of 5 borings were completed to depths of 25 to 51.5 feet below existing grade utilizing a truck- mounted drilling rig equipped with an 8-inch diameter hollow-stem auger, and associated soil sampling and logging by a geologist and engineer to substantiate the subsurface findings reported by the previous consultant and obtain additional subsurface information. A total of five (5) monitoring wells were installed to determine static water levels and provide a means of groundwater monitoring in advance of and during construction. A review of the liquefaction analyses performed by the previous consultant and the performance of two (2) additional Cone Penetrometer Tests to depths of 50 feet below grade for liquefaction evaluation. All boring sites and CPT locations are shown in **Figure 4.4.1**, **Boring and CPT Locations.**

4.4.5 Thresholds of Significance

The thresholds for geology and soils impacts used in this analysis are consistent with Appendix G of the State CEQA Guidelines and the City's Initial Study/Environmental Checklist. The proposed project may be deemed to have a significant impact with respect to geology and soils if it would:



LSA

FIGURE 4.4.1

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FEET

SOURCE: G3 SoilWorks

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5665 Plaza Drive Project Draft Environmental Impact Report

Boring and CPT Locations

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Threshold GEO-1: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

(i): Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidences of known fault? (Refer to Division of Mines and Geology Special Publication 42)

(ii): Strong seismic ground shaking?

(iii): Seismic-related ground failure, including liquefaction?

(iv): Landslides?

Threshold GEO-2: Result in substantial soil erosion or the loss of topsoil?

Threshold GEO-3: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-site or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse?

Threshold GEO-4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating direct or indirect substantial risks to life or property?

Threshold GEO-5: Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Threshold GEO-6: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

4.4.6 Project Impacts

Threshold GEO-1(i): **Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidences of known fault? (Refer to Division of Mines and Geology Special Publication 42)**

Impact GEO-1(i): No Impact. According to the Geotechnical Evaluation, active faults do not appear to be present under or in close proximity to the project site. Additionally, according to the California Geological Survey's EQ Zapp: California Earthquake Hazards Zone Application (EQ Zapp web-based application), the Newport-Inglewood and Whittier Fault Zones are the nearest fault zones located approximately 5.1 miles southwest and 11.6 miles northeast of the project site, respectively. Therefore, surface rupture is not anticipated to occur within the project site or surrounding vicinity. No impact would occur, and no mitigation is required.

Threshold GEO-1(ii): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?

Impact GEO-1(ii): Less Than Significant Impact. As mentioned above, the Geotechnical Evaluation determined no evidence of active faults to be present under or in close proximity to the project site. However, incidental ground cracking and other ground shaking phenomena can occur due to high seismic accelerations and regional seismic activity. Thus, it was determined in the Geotechnical Evaluation that risks associated with seismic shaking and strong ground motion are considered to be moderate.

As specified in **Regulatory Compliance Measure GEO-1,** below, the proposed project's building would be subject to the seismic design criteria of the most current CBC requirements that aim to prevent building collapse and reduce the impacts of seismic ground shaking. Adherence to these requirements would address injury and loss of life and building damage after an earthquake. Therefore, with the implementation of **Regulatory Compliance Measure GEO-**1, impacts related to seismic ground shaking would be less than significant, and no mitigation is required. It should also be noted that the project is subject to Mitigation Measure GEO-1, which requires implementation of the recommendations of the Geotechnical Evaluation.

Threshold GEO-1(iii): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?

Impact GEO-1(iii): Less Than Significant with Mitigation Incorporated. Soil liquefaction is a phenomenon in which cyclic stresses, produced by earthquake-induced ground motion, create excess pore pressures in relatively cohesionless and low plastic soils. These soils may thereby acquire a high degree of mobility, which can lead to lateral movement, sliding, consolidation and settlement of loose sediments, sand boils, and other damaging deformations. This phenomenon occurs only below the water table; however, after liquefaction has developed, the effects can propagate upward into overlying non-saturated soil as excess pore water dissipates.

The factors known to influence liquefaction potential include soil type and grain size, relative density, groundwater level, confining pressures, and both intensity and duration of ground shaking. In general, materials that are susceptible to liquefaction are loose, saturated granular soils having low fine content under low confining pressures and some low plastic silts and clays.

According to the California Geological Survey's EQ Zapp, the project site is located in a Liquefaction Hazards Zone of required investigations. The Geotechnical Evaluation included a subsurface exploration and has determined the presence of potentially liquefiable soils to depths of 50 feet. Further analysis determined potential dynamic settlements of approximately 2.9 inches to 5.27 inches during a strong seismic event.

This dynamic settlement as a result of severe seismic activity is expected to occur over a large area and would result in areal subsidence, and the potential differential settlement is expected to be significantly less over any relatively small segment. However, given the nature of the proposed project, which includes a light industrial facility with office and warehouse uses, differential

settlements under current conditions could be significant. Thus, remedial grading, foundation considerations, and/or in-situ ground improvement measures are recommended in the Geotechnical Evaluation to help mitigate potential adverse effects due to soil liquefaction.

Mitigation Measure GEO-1, provided below, requires the construction contractor to comply with the recommendations in the Geotechnical Evaluation to reduce the proposed project's impact related to liquefaction. Therefore, with implementation of **Mitigation Measure GEO-1,** the proposed project's impacts related to liquefaction would be reduced to less than significant. The project would also be required to adhere to **Regulatory Compliance Measure GEO-1**.

Threshold GEO-1(iv): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?

Impact GEO-1(iv): No Impact. According to the City's General Plan Safety Element (2001), no significant topographic features exist within the City. Further, according to the Geotechnical Evaluation, the topography of the site is relatively flat to very gently sloping. Site elevations in feet above the NAVD88 are estimated to range from approximately 38 feet amsl near the northeast and southeast corners of the site, approximately 39 feet amsl near the center of the site, and approximately 35–36 feet amsl near the northwest and southwest corners of the site, respectively. Evidence of ancient landslides or slope instabilities were not observed at the project site. Both the project site and surrounding properties are flat with no unusual geographic features, and therefore, neither the project site nor the surrounding area has the potential for impacts related to landslides. No mitigation is required.

Threshold GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Impact GEO-2: Less Than Significant Impact. During project construction activities, soil would be exposed and disturbed, drainage patterns would be temporarily altered during grading and other construction activities, and there would be an increased potential for soil erosion and siltation compared to existing conditions. However, as described in Section 4.10, Hydrology and Water Quality, the Construction General Permit requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) (see **Regulatory Compliance Measure HYD-1** in that section). The SWPPP would detail Erosion Control and Sediment Control Best Management Practices (BMPs) to be implemented during project construction to minimize erosion and retain sediment on site. With compliance with the requirements of the Construction General Permit and with implementation of the construction BMPs, construction impacts related to substantial soil erosion and loss of topsoil would be less than significant. Following construction, the project site would be covered with the proposed buildings, paving, and landscaping. Therefore, operation of the proposed project would not result in substantial soil erosion or loss of topsoil. Potential soil erosion impacts related to construction activities would be less than significant with adherence to the required regulations discussed above. Operation of the proposed project would result in no impacts related to soil erosion or loss of topsoil. No mitigation is required.

Threshold GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-site or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse?

4.4.6.1 Landslides and Unstable Slopes

Impact GEO-3: Less Than Significant Impact. Landslides and other forms of mass wasting, including mud flows, debris flows, and soil slips, occur as soil moves downslope under the influence of gravity. Landslides are frequently triggered by intense rainfall or seismic shaking. Because the project site is in a flat area, landslides or other forms of natural slope instability do not represent a significant hazard to the project site or the surrounding area. In addition, as discussed under Threshold GEO-1(iv), the site is not within an area susceptible to landslides as both the project site and surrounding properties are flat with no unusual geographic features. Therefore, potential impacts related to landslides would be less than significant, and no mitigation is required.

4.4.6.2 Lateral Spreading

Impact GEO-3: Less Than Significant Impact. Lateral spreading often occurs on very gentle slopes or flat terrain. The dominant mode of movement is lateral extension accompanied by shear or tensile fracture. This failure is caused by liquefaction and is usually triggered by rapid ground motion, such as that experienced during an earthquake, but can also be artificially induced. When coherent material, either bedrock or soil, rests on materials that liquefy, the upper units may undergo fracturing and extension and may then subside, translate, rotate, disintegrate, or liquefy and flow. The Geotechnical Evaluation indicates that heavy lateral spreading is considered a low risk while ground cracking displacements, and localized spread is considered a moderate risk. These risks would be reduced by the implementation of **Regulatory Compliance Measure GEO-1**, which would include ground treatment and dewatering, as well as providing a capping of engineered fill. Therefore, potential impacts related to lateral spreading would be less than significant, and no mitigation is required.

4.4.6.3 Subsidence

Impact GEO-3: Less Than Significant Impact. Subsidence refers to broad-scale changes in the elevation of land. Common causes of land subsidence are pumping water, oil, and gas from underground reservoirs; dissolution of limestone aquifers (sinkholes); collapse of underground mines; drainage of organic soils; and initial wetting of dry soils (hydrocompaction). Subsidence may also be caused by heavy loads generated by large earthmoving equipment. As stated in the Geotechnical Evaluation, dynamic settlement as a result of liquefaction is expected to occur over a large area and would result in areal subsidence, and the potential differential settlement is expected to be significantly less over any relatively small segment. As specified in **Regulatory Compliance Measure GEO-1**, the proposed project's buildings would be subject to the seismic design criteria of the most current CBC requirements that aim to prevent building collapse and reduce the impacts of seismic ground shaking. Adherence to these requirements would address injury and loss of life and building damage during and after an earthquake. The proposed project's compliance with the most current CBC requirements would also reduce the project's impacts related to subsidence. Adherence to these requirements would address the removal and replacement of site soils. Therefore, with the

implementation of **Regulatory Compliance Measure GEO-1**, impacts related to seismic ground shaking would be less than significant, and no mitigation is required.

4.4.6.4 Liquefaction and Compressible/Collapsible Soils

Impact GEO-3: Less Than Significant with Mitigation Incorporated. As discussed in detail under Threshold GEO-1(iii) above, implementation of **Mitigation Measure GEO-1** and adherence to the regulatory standards described in **Regulatory Compliance Measure GEO-1** would be required to address the proposed project's impacts with respect to liquefaction. Provided that design and remedial grading and ground improvement (as necessary) are performed in accordance with the applicable requirements in the CBC (adopted by the City as its Building Code with certain amendments), and current standards of practice in the area, excessive settlement resulting from liquefaction and compression of existing undocumented fill and some layers of loose sands and silty sands on the project site would be reduced to a less than significant level.

Threshold GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating direct or indirect substantial risks to life or property?

Impact GEO-4: Less Than Significant Impact. According to the Geotechnical Evaluation prepared for the proposed project, surface site soils had a "very low" potential for expansion. No recommendations are provided in the Geotechnical Evaluation related to expansive soils due to this very low potential. Therefore, impacts related to expansive soils for the proposed project would be less than significant. No mitigation is required.

Threshold GEO-5: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Impact GEO-5: No Impact. The proposed project would not include the use of septic tanks or alternative wastewater disposal systems because sanitary sewer and wastewater facilities are available in the vicinity of the project site. Therefore, the project would have no impact with respect to septic tanks or alternative wastewater disposal systems. No mitigation is required.

Threshold GEO-6: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact GEO-6: Less Than Significant with Mitigation Incorporated. The project site contains Artificial Fill, which has no paleontological sensitivity, and Young Alluvium, Unit 2, which has low paleontological sensitivity from the surface to a depth of 10 feet and high paleontological sensitivity below 10 feet. With a maximum excavation depth of 8 feet during construction, the proposed project is expected to remain in deposits with no or low paleontological sensitivity. However, in the event that paleontological resources are encountered during construction, **Mitigation Measure GEO-2**, detailed below, would require work in the immediate area of the discovery to be halted and a qualified paleontologist to assess the discovery. These procedures would reduce potential impacts to scientifically significant nonrenewable paleontological resources encountered during construction.

4.4.7 Level of Significance Prior to Mitigation

The potential for surface fault rupture, erosion, subsidence, landslides, lateral spreading, and expansive soil is less than significant, and no mitigation is required. The potential impacts related to seismic shaking, liquefaction, and settlement due to compressible and wet soils would be potentially significant prior to mitigation. The proposed project would also have potentially significant impacts on paleontological resources prior to the implementation of mitigation.

4.4.8 Regulatory Compliance Measures and Mitigation Measures

4.4.8.1 Regulatory Compliance Measures

The following regulatory compliance measure is a requirement of the CBC that is applicable to the proposed project and is considered in the analysis of potential impacts related to geology and soils. The City of Cypress considers this requirement to be mandatory; therefore, it is not a mitigation measure.

Regulatory Compliance Measure GEO-1 **Compliance with Seismic and Standards in the Building Code.** Prior to issuance of the first building permit for the proposed buildings, the City of Cypress (City) Engineer, Building Official, or their designee, and the project soils engineer shall review the building plans to verify that the structural design conforms to the requirements of the City's latest adopted edition of the California Building Standards Code. Structures and walls shall be designed in accordance with applicable sections of the City's Building Code.

4.4.8.2 Mitigation Measures

In addition to the regulatory requirements described above, the following mitigation measures would reduce potential impacts related to seismic ground shaking, liquefaction, compressible/ collapsible soils, and paleontological resources to a less than significant level.

Mitigation Measure GEO-1 **Implementation of Geotechnical Evaluation Recommendations.** The Applicant's construction contractor shall implement the recommendations of the Geotechnical Evaluation prepared for the proposed project, as applicable, to the satisfaction of the City of Cypress' (City) Building Official, or designee. The City's Building Official, or designee, shall confirm recommendations have been implemented into the design and construction of the proposed project prior to the issuance of a building permit.

Mitigation Measure GEO-2 **Procedures for Unexpected Paleontological Resources Discoveries.** In the event that paleontological resources are encountered, work in the immediate area of the

discovery shall be halted and the Applicant shall retain a professional paleontologist who meets the qualifications established by the Society of Vertebrate Paleontology to assess the discovery. The qualified, professional paleontologist shall make recommendations regarding the treatment and disposition of the discovered resources, as well as the need for subsequent paleontological mitigation, which may include, but not be limited to, paleontological monitoring, collection of observed resources, preservation, stabilization and identification of collected resources, curation of resources into a museum repository, and preparation of a monitoring report of findings, consistent with well accepted standards, such as those established by the Society of Vertebrate Paleontology. The City of Cypress shall ensure that the recommendations from the qualified, professional paleontologist shall be followed by the Applicant

4.4.9 Level of Significance after Mitigation

With implementation of **Regulatory Compliance Measure GEO-1** and **Mitigation Measures GEO-1 and GEO-2**, all identified potentially significant impacts related to geotechnical hazards and paleontological resources would be reduced below a level of significance.

4.4.10 Cumulative Impacts

Typically, geology and soils impacts are specific to a particular project site and there is little, if any, cumulative relationship between the development of a proposed project and development within a larger cumulative area. Moreover, while seismic conditions are regional in nature, seismic impacts on a given project site are site-specific. For example, development within the project site would not alter geologic events or soil features/characteristics (such as ground shaking, seismic intensity, or soil expansion or compression). Therefore, the proposed project would not affect the level of intensity at which a seismic event on an adjacent site is experienced.

While seismic events may affect a broad region, development of the cumulative projects would not increase the intensity, frequency, or duration of seismic events or the properties of off-site geology or soils. The CBC (adopted by reference in Chapter 15.08 [Construction Codes] of the City's Municipal Code) contains provisions to safeguard against major structural failures or loss of life caused by earthquakes, liquefaction, ground shaking, landslides, and other seismically induced hazards, as codified in **Regulatory Compliance Measure GEO-1**. In addition, the Geotechnical Evaluation recommendations would reduce potential impacts related to seismic ground shaking, liquefaction, compressible/collapsible soils as required by **Mitigation Measure GEO-1.** Cumulative development projects would be required to undergo environmental review pursuant to CEQA including, as necessary, site-specific investigation of potential geologic, seismic, or soil-related impacts. It is reasonable to expect that such site-specific investigation would appropriately identify the siting, design, and construction criteria established in the CBC and/or by the City to address site-

specific geologic/soil conditions affecting future development, and that the City would condition future development to fully satisfy said criteria. Therefore, cumulative geologic, seismic, or soil-related impacts would be rendered to a less than significant level, and the project's contribution to such impacts would not be cumulatively considerable.

It is not anticipated that their development would have any geotechnical impact on the project site or the buildings that would be constructed as part of the proposed project, nor would the project have geotechnical impacts on any of the 11 related projects identified in **Table 4.A, Summary of Related Projects,** in Chapter 4.0, Existing Setting. Therefore, the proposed project and the applicable related projects would not have the potential to cause cumulatively significant adverse impacts related to geology and soils.

Potential impacts of the proposed project to unknown paleontological resources and unique geologic features, when combined with the impacts of past, present, and reasonably foreseeable probable future projects in the City of Cypress, could contribute to a cumulatively significant impact due to the overall loss of paleontological remains unique to the region. However, each development proposal received by the City is required to undergo environmental review pursuant to CEQA. If there were any potential for significant impacts to paleontological resources or unique geologic features, an investigation would be required to determine the nature and extent of the resources and identify appropriate mitigation measures.

When resources are assessed and/or protected as they are discovered, impacts to these resources are less than significant. As such, implementation of **Mitigation Measure GEO-2** would ensure that the proposed project, together with cumulative projects, would not result in significant cumulative impacts to unique paleontological resources or unique geologic features.

4.5 GREENHOUSE GAS EMISSIONS

This section provides a discussion of global climate change (GCC), existing regulations pertaining to GCC, and an analysis of greenhouse gas (GHG) emissions associated with the 5665 Plaza Drive Project (proposed project). This analysis used the CalEEMod version 2022.1. to quantify the potential GHG emissions associated with both construction and operation of the proposed project. The CalEEMod output is contained in **Appendix C** of this Draft EIR.

4.5.1 Scoping Process

The City received 2 comment letters during the public review period for the NOP. For copies of the NOP comment letters, refer to **Appendix A** of this Draft EIR. Two comment letters included comments related to GHG emissions.

The letter from Los Alamitos received on June 5, 2024, suggest that the Draft EIR should evaluate the proposed project's impact greenhouse gas emission increases from the proposed land use changes.

The Letter from Warland Investments Company and Affiliated Entities received on June 5, 2024, attached a previous letter dated March 7, 2024, stating their concerns related to the failure to meet "Less than Significant" emissions by exceeding the 3,000 MT CO2e per year SCAQMD threshold and the failure to evaluate the effects of off-site GHG emissions.

4.5.2 Regulatory Setting

4.5.2.1 Federal Regulations

Clean Air Act (CAA)(42 U.S.C. §§ 7401-7671q). The United States has historically had a voluntary approach to reducing GHG emissions. However, on April 2, 2007, the United States Supreme Court ruled that the USEPA has the authority to regulate CO_2 emissions under the Clean Air Act. While there currently are no adopted federal regulations for the control or reduction of GHG emissions, the USEPA commenced several actions in 2009 to implement a regulatory approach to global climate change.

This includes the 2009 USEPA final rule for mandatory reporting of GHGs from large GHG emission sources in the United States. Additionally, the USEPA Administrator signed an endangerment finding action in 2009 under the Clean Air Act, finding that six GHGs (CO_2, methane (CH_4), nitrous oxide (N_2O), hydroflourocarbons (HFCs), perfluourocarbons (PFCs), sulfur hexafluoride (SF_6) constitute a threat to public health and welfare, and that the combined emissions from motor vehicles cause and contribute to global climate change, leading to national GHG emission standards.

Federal Vehicle Emissions Standards. In October 2012, the USEPA and the NHTSA, on behalf of the United States Department of Transportation, issued final rules to further reduce GHG emissions and improve CAFE standards for light-duty vehicles for model years 2017 and beyond (77 Fed. Reg. 62624 [October 15, 2012). The NHTSA's CAFE standards have been enacted under the Energy Policy and Conservation Act since 1978. This national program requires automobile manufacturers to build a single light-duty national fleet that meets all requirements under both federal programs and the standards of California and other states. This program would increase fuel economy to the equivalent of 54.5 miles per gallon, limiting vehicle emissions to 163 grams of CO_2 per mile for the

fleet of cars and light-duty trucks by model year 2025 (77 Fed. Reg. 62624, 62630 [October 15, 2012]).

On March 31, 2022, the NHTSA finalized the CAFE standards for Model Years 2024–2026 Passenger Cars and Light Trucks. The amended CAFE standards would require an industry-wide fleet average of approximately 49 mpg for passenger cars and light trucks in model year 2026, by increasing fuel efficiency by 8 percent annually for model years 2024–2025, and 10 percent annually for model year 2026. The final standards are estimated to save about 234 billion gallons of gas between model years 2030 to 2050.

4.5.2.2 State Regulations

Assembly Bill 1493 (AB 1493)(2002). In a response to the transportation sector's significant contribution to California's CO2 emissions, AB 1493 was enacted on July 22, 2002. AB 1493 required the CARB to set GHG emission standards for passenger vehicles and light duty trucks (and other vehicles whose primary use is noncommercial personal transportation in the State) manufactured in 2009 and all subsequent model years. These standards (starting in model years 2009 to 2016) were approved by the CARB in 2004, but the needed waiver of California Clean Air Act Preemption was not granted by the USEPA until June 30, 2009. The CARB responded by amending its original regulation, now referred to as Low Emission Vehicle III, to take effect for model years starting in 2017 to 2025. The Trump administration revoked California's preemption waiver in 2019; however, the Biden administration restored it in 2021.

Executive Order S-3-05 (2005). Governor Arnold Schwarzenegger signed Executive Order (EO) S-3-05 on June 1, 2005, which proclaimed that California is vulnerable to the impacts of climate change. To combat those concerns, the executive order established California's GHG emissions reduction targets, which established the following goals:

- GHG emissions should be reduced to 2000 levels by 2010.
- GHG emissions should be reduced to 1990 levels by 2020.
- GHG emissions should be reduced to 80 percent below 1990 levels by 2050.

The Secretary of the California Environmental Protection Agency is required to coordinate efforts of various State agencies to collectively and efficiently reduce GHGs. A biannual progress report must be submitted to the Governor and the State Legislature disclosing the progress made toward GHG emission reduction targets. In addition, another biannual report must be submitted illustrating the impacts of global warming on California's water supply, public health, agriculture, the coastline, and forestry, and report possible mitigation and adaptation plans to address these impacts.

The Secretary of the California Environmental Protection Agency leads this Climate Action Team (CAT) made up of representatives from State agencies as well as numerous other boards and departments. The CAT members work to coordinate statewide efforts to implement global warming emission reduction programs and the State's Climate Adaptation Strategy. The CAT is also responsible for reporting on the progress made toward meeting the statewide GHG targets that were established in the executive order and further defined under AB 32, the "Global Warming Solutions Act of 2006." The first CAT Report to the Governor and the State Legislature, which was released in March 2006, laid out 46 specific emission-reduction strategies for reducing GHG

emissions and reaching the targets established in the executive order. The most recent report was released in December 2020.

Assembly Bill 32 (AB 32) (2006), California Global Warming Solutions Act. California's major initiative for reducing GHG emissions is AB 32, passed by the State Legislature on August 31, 2006. This legislation aimed at reducing GHG emissions to 1990 levels by 2020. The CARB has established the level of GHG emissions in 1990 at 427 million metric tons (MMT) of CO_2e. The emissions target of 427 MMT requires the reduction of 169 MMT from the State's projected business-as-usual 2020 emissions of 596 MMT. AB 32 required the CARB to prepare a Scoping Plan outlining the main State strategies for meeting the 2020 deadline and reducing GHGs that contribute to global climate change. The Scoping Plan was approved by the CARB on December 11, 2008, and contains the main strategies California will implement to achieve the reduction of approximately 169 MMT CO_2e, or approximately 30 percent, from the State's projected 2020 emissions level of 596 MMT CO_2e under a business-as-usual scenario (this was a reduction of 42 MMT CO_2e, or almost 10 percent from 2002–2004 average emissions). The Scoping Plan also includes CARB-recommended GHG reductions for each emissions sector of the State's GHG inventory. The Scoping Plan calls for the largest reductions in GHG emissions to be achieved by implementing the following measures and standards:

- Improved emissions standards for light-duty vehicles (estimated reductions of 31.7 MMT CO_2e)
- The Low-Carbon Fuel Standard (15.0 MMT CO_2e)
- Energy efficiency measures in buildings and appliances and the widespread development of combined heat and power systems (26.3 MMT CO_2e)
- A renewable portfolio standard for electricity production (21.3 MMT CO_2e)

The Scoping Plan identifies 18 emission-reduction measures that address cap-and-trade programs, vehicle gas standards, energy efficiency, low carbon fuel standards, renewable energy, regional transportation-related GHG targets, vehicle efficiency measures, goods movement, solar roof programs, industrial emissions, high-speed rail, green building strategies, recycling, sustainable forests, water, and air. The measures were estimated to result in a total reduction of 174 MMT CO_2e by 2020.

On August 24, 2011, the CARB unanimously approved both the new supplemental assessment and reapproved its Scoping Plan, which provides the overall roadmap and rule measures to carry out AB 32. The CARB also approved a more robust CEQA equivalent document supporting the supplemental analysis of the cap-and-trade program. The cap-and-trade program took effect on January 1, 2012, with an enforceable compliance obligation that began January 1, 2013.

The CARB approved the First Update to the Climate Change Scoping Plan on May 22, 2014. The First Update identifies opportunities to leverage existing and new funds to further drive GHG emission reductions through strategic planning and targeted low carbon investments. The First Update defined CARB climate change priorities until 2020, and also set the groundwork to reach long-term goals set forth in EOs S-3-05 and B-16-2012. In addition, the First Update highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals as defined in the

initial Scoping Plan. It also evaluated how to align the State's "longer-term" GHG reduction strategies with other State policy priorities for water, waste, natural resources, clean energy, transportation, and land use. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan,[53] to reflect the 2030 target set by EO B-30-15 and codified by Senate Bill (SB) 32.

The 2022 Scoping Plan[54] was approved in December 2022. It assesses progress towards achieving the SB 32 2030 target and lays out a path to achieve carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

Senate Bill 97 (SB 97) (2007).

SB 97, signed by Governor Schwarzenegger in August 2007 (Chapter 185, Statutes of 2007; Public Resources Code, Sections 21083.05 and 21097), acknowledges climate change is a prominent environmental issue that requires analysis under the California Environmental Quality Act (CEQA). This bill directed the Governor's Office of Planning and Research to prepare, develop, and transmit to the California Resources Agency guidelines for mitigating GHG emissions or the effects of GHG emissions, as required by CEQA.

The California Natural Resources Agency adopted the amendments to the State CEQA Guidelines in November 2018, which went into effect in December 2018. The amendments do not identify a threshold of significance for GHG emissions, nor do they prescribe assessment methodologies or specific mitigation measures. The amendments encourage lead agencies to consider many factors in performing a CEQA analysis, but preserve the discretion granted by CEQA to lead agencies in making their own determinations based on substantial evidence. The amendments also encourage public agencies to make use of programmatic mitigation plans and programs when they perform individual project analyses.

Senate Bill 375 (SB 375) (2008). SB 375, the Sustainable Communities and Climate Protection Act, which establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions, was adopted by the State on September 30, 2008. On September 23, 2010, the CARB adopted the vehicular GHG emissions reduction targets that had been developed in consultation with the Metropolitan Planning Organization (MPO); the targets required a 6 to 15 percent reduction by 2020 and between 13 to 19 percent reduction by 2035 for each MPO. SB 375 recognizes the importance of achieving significant GHG reductions by working with cities and counties to change land use patterns and improve transportation alternatives. Through the SB 375 process, MPOs such as the Southern California Association of Governments (SCAG) will work with local jurisdictions in the development of a Sustainable Communities Strategy (SCS) designed to integrate development patterns and the transportation network in a way that reduces GHG emissions while meeting housing needs and other regional planning objectives. Pursuant to SB 375,

53 CARB. 2017. *California's 2017 Climate Change Scoping Plan*. November.

54 CARB. 2021. *2022 Scoping Plan Update*. May 10. Website: https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf (accessed June 2024).

the Los Angeles/Southern California reduction targets for per capita vehicular emissions were 8 percent by 2020 and are 19 percent by 2035, as shown in **Table 4.5.1**.

Table 4.5.1: Senate Bill 375 Regional Greenhouse Gas Emissions Reduction Targets

Metropolitan Planning Organization	By 2020 (percentage)	By 2035 (percentage)
San Francisco Bay Area	10	19
San Diego	15	19
Sacramento	7	19
Central Valley/San Joaquin	6–13	13–16
Los Angeles/Southern California	8	19

Source: California Air Resources Board (2018).

Executive Order B-30-15 (EO B-30-15) (2015). Governor Jerry Brown signed EO B-30-15 on April 29, 2015, which added the immediate target of:

- GHG emissions should be reduced to 40 percent below 1990 levels by 2030.

All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB was directed to update the AB 32 Scoping Plan to reflect the 2030 target. The mid-term target is critical to help frame the suite of policy measures, regulations, planning efforts, and investments in clean technologies and infrastructure needed to continue reducing emissions.

Senate Bill 350 (SB 350) (2015) Clean Energy and Pollution Reduction Act. SB 350, signed by Governor Brown on October 7, 2015, updates and enhances AB 32 by introducing the following set of objectives in clean energy, clean air, and pollution reduction for 2030:

- Raise California's renewable portfolio standard from 33 percent to 50 percent; and
- Increasing energy efficiency in buildings by 50 percent by the year 2030.

The 50 percent renewable energy standard will be implemented by the California Public Utilities Commission for the private utilities and by the California Energy Commission for municipal utilities. Each utility must submit a procurement plan showing it will purchase clean energy to displace other non-renewable resources. The 50 percent increase in energy efficiency in buildings must be achieved through the use of existing energy efficiency retrofit funding and regulatory tools already available to State energy agencies under existing law. The addition made by this legislation requires State energy agencies to plan for, and implement those programs in a manner that achieves the energy efficiency target.

Senate Bill 32 (SB 32), California Global Warming Solutions Act of 2016, and Assembly Bill 197 (AB 197). In summer 2016, the State Legislature passed, and the Governor signed, SB 32 and AB 197. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in Governor Brown's April 2015 EO B-30-15. SB 32 builds on AB 32 and keeps the State on the path toward

achieving its 2050 objective of reducing emissions to 80 percent below 1990 levels, consistent with an Intergovernmental Panel on Climate Change analysis of the emissions trajectory that would stabilize atmospheric GHG concentrations at 450 parts per million CO_2e and reduce the likelihood of catastrophic impacts from climate change.

The companion bill to SB 32, AB 197, provides additional direction to CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 meant to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

Senate Bill 100 (SB 100). On September 10, 2018, Governor Brown signed SB 100, which raises California's Renewables Portfolio Standard requirements to 60 percent by 2030, with interim targets, and 100 percent by 2045. The bill also establishes a State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the Western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Executive Order B-55-18 (EO B-55-18). EO B-55-18, signed September 10, 2018, set a goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." EO B-55-18 directs CARB to work with relevant State agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO_2e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

California Building Standards Code and CALGreen Code (Cal. Code Regs. Tit. 24, pt. 11). In November 2008, the California Building Standards Commission established the California Green Building Standards Code (CALGreen Code), which sets performance standards for residential and non-residential development to reduce environmental impacts and encourage sustainable construction practices. The CALGreen Code addresses energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The CALGreen Code is updated every 3 years and was most recently updated in 2022 to include new mandatory measures for residential as well as non-residential uses; the new measures took effect on January 1, 2023.

California Building Efficiency Standards (Cal. Code Regs. Tit. 24, pt. 6). The California Building Standards Code, or Title 24 of the California Code of Regulations contains the regulations that govern the construction of buildings in California. Within the Building Standards Code, two parts pertain to the incorporation of both energy efficient and green building elements into land use development. Part 6 is California's Energy Efficiency Standards for Residential and Non-Residential Buildings. These standards were first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption and are updated on an approximately 3-year cycle to allow consideration and possible incorporation of new energy efficient technologies and methods. All buildings for which an application for a building permit is submitted on or after January 1, 2023,

must follow the 2022 standards. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions.

Cap and Trade. The development of a cap-and-trade program was included as a key reduction measure of the CARB AB 32 Climate Change Scoping Plan. The cap-and-trade program will help put California on the path to meet its goal of achieving an 80 percent reduction of GHG emissions from 1990 levels by 2050. The cap-and-trade emissions trading program developed by the CARB took effect on January 1, 2012, with enforceable compliance obligations beginning January 1, 2013. The cap-and-trade program aims to regulate GHG emissions from the largest producers in the State by setting a statewide firm limit, or cap, on allowable annual GHG emissions. The cap was set in 2013 at approximately 2 percent below the emissions forecast for 2020. In 2014, the cap declined approximately 2 percent. Beginning in 2015 and continuing through 2020, the cap has been declining approximately 3 percent annually. The CARB administered the first auction on November 14, 2012, with many of the qualified bidders representing corporations or organizations that produce large amounts of GHG emissions, including energy companies, agriculture and food industries, steel mills, cement companies, and universities. On January 1, 2015, compliance obligation began for distributors of transportation fuels, natural gas, and other fuels. The cap-and-trade program was initially slated to sunset in 2020, but the passage of SB 398 in 2017 extended the program through 2030.

Executive Order N-79-20 (EO N-79-20). EO N-79-20, which was signed by Governor Gavin Newsom on September 23, 2020, sets the following goals for the State: 100 percent of in-State sales of new passenger cars and trucks shall be zero-emission by 2035; 100 percent of medium- and heavy-duty vehicles in the State shall be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks; and 100 percent of off-road vehicles and equipment in the State shall be zero-emission by 2035, where feasible.

Assembly Bill 1279. AB 1279 was signed in September of 2022, and codifies the State's goals of achieving net carbon neutrality by 2045 and maintaining net negative GHG emissions thereafter. This bill also requires California to reduce statewide GHG emissions by 85 percent compared to 1990 levels by 2045 and directs CARB to work with relevant state agencies to achieve these goals.

California Integrated Waste Management Act of 1989 (AB 939). To minimize the amount of solid waste that must be disposed of in landfills, the State Legislature passed the California Integrated Waste Management Act of 1989 (AB 939), effective January 1990. According to AB 939, all cities and counties were required to divert 25 percent of all solid waste from landfill facilities by January 1, 1995, and 50 percent by January 1, 2000. Through other statutes and regulations, this 50 percent diversion rate also applies to State agencies. In order of priority, waste reduction efforts must promote source reduction, recycling and composting, and environmentally safe transformation and land disposal. In 2011, AB 341 modified the California Integrated Waste Management Act and directed the CalRecycle to develop and adopt regulations for mandatory commercial recycling. AB 341 also established a statewide recycling goal of 75 percent; the 50 percent disposal reduction mandate still applies for cities and counties under AB 939, the Integrated Waste Management Act. In April 2016, AB 1826 further modified the California Integrated Waste Management Act, requiring businesses that generate a specified amount of organic waste per week to arrange for recycling services for that organic waste in a specified manner. Diverting organic waste from landfills reduces

emissions of CH_4. This is equivalent to reducing anaerobic decomposition of organic waste that would have otherwise occurred in landfills where organic waste is often buried with other inorganic waste.

Low Carbon Fuel Standard. In January 2007, EO S-01-07 established a low carbon fuel standard (LCFS). This executive order calls for a statewide goal to be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020, and that an LCFS for transportation fuels be established for California. The LCFS applies to all refiners, blenders, producers, or importers ("Providers") of transportation fuels in California, including fuels used by off-road construction equipment. In June 2007, CARB adopted the LCFS under AB 32 pursuant to Health and Safety Code Section 38560.5, and, in April 2009, CARB approved the new rules and carbon intensity reference values with new regulatory requirements taking effect in January 2011. The standards require providers of transportation fuels to report on the mix of fuels they provide and demonstrate they meet the LCFS intensity standards annually. This is accomplished by ensuring that the number of "credits" earned by providing fuels with a lower carbon intensity than the established baseline (or obtained from another party) is equal to or greater than the "deficits" earned from selling higher-intensity fuels. In response to certain court rulings, CARB re-adopted the LCFS regulation in September 2015, and the LCFS went into effect on January 1, 2016. In 2018, CARB approved amendments to the regulation to readjust carbon intensity benchmarks to meet California's 2030 GHG reductions targets under SB 32. These amendments include opportunities to promote zero-emission vehicle (ZEV) adoption, carbon capture and sequestration, and advanced technologies for decarbonization of the transportation sector.

Advanced Clean Cars Program. In January 2012, CARB approved the Advanced Clean Cars program, which combines the control of GHG emissions and criteria air pollutants, as well as requirements for greater numbers of ZEVs, into a single package of regulatory standards for vehicle model years 2017 through 2025. The new regulations strengthen the GHG standard for 2017 models and beyond. This will be achieved through existing technologies, the use of stronger and lighter materials, and more efficient drivetrains and engines. The program's ZEVs regulation requires battery, fuel cell, and/or plug-in hybrid electric vehicles to account for up to 15 percent of California's new vehicle sales by 2025. The program also includes a clean fuel outlet regulation designed to support the commercialization of zero-emission hydrogen fuel cell vehicles planned by vehicle manufacturers by 2015 by requiring increased numbers of hydrogen fueling stations throughout the State. The number of stations will grow as vehicle manufacturers sell more fuel cell vehicles. By 2025, when the rules will be fully implemented, the statewide fleet of new cars and light trucks will emit 40 percent fewer GHGs and 75 percent fewer smog-forming emissions than 2012 model year vehicles.

Executive Order B-48-18 (EO B-48-18). In January 2018, Governor Brown signed EO B-48-18 requiring all State entities to work with the private sector to have at least 5 million ZEVs on the road by 2030, as well as install 200 hydrogen fueling stations and 250,000 electric vehicle charging stations by 2025. It specifies that 10,000 of the electric vehicle charging stations should be direct current fast chargers. This order also requires all State entities to continue to partner with local and regional governments to streamline the installation of ZEV infrastructure. The Governor's Office of Business and Economic Development is required to publish a Plug-in Charging Station Design Guidebook and update the 2015 Hydrogen Station Permitting Guidebook to aid in these efforts. All State entities are required to participate in updating the 2016 Zero-Emissions Vehicle Action Plan to

help expand private investment in ZEV infrastructure with a focus on serving low-income and disadvantaged communities. Additionally, all State entities are to support and recommend policies and actions to expand ZEV infrastructure at residential land uses, through the LCFS Program, and recommend how to ensure affordability and accessibility for all drivers.

4.5.2.3 Regional Regulations

South Coast Air Quality Management District. SCAQMD is the responsible for air quality regulation in the South Coast Air Basin. In 2008, the SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the Basin. The Working Group developed several different options that are contained in the SCAQMD 2008 draft guidance document titled Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans[55] that could be applied by lead agencies. On September 28, 2010, SCAQMD Working Group Meeting No. 15 provided further guidance, including a tiered approach for evaluating GHG emissions for development projects where the SCAQMD is not the lead agency. The SCAQMD has not presented a finalized version of these thresholds to the governing board.

The SCAQMD identifies the emissions level for which a project would not be expected to substantially conflict with any State legislation adopted to reduce statewide GHG emissions. As such, the utilization of a service population represents the rates of emissions needed to achieve a fair share of the State's mandated emissions reductions. Overall, the SCAQMD identifies a GHG efficiency level that, when applied statewide or to a defined geographic area, would meet the 2020 and post-2020 emissions targets as required by AB 32 and SB 32. If projects are able to achieve targeted rates of emissions per the service population, the State will be able to accommodate expected population growth and achieve economic development objectives, while also abiding by AB 32's emissions target and future post-2020 targets.

Southern California Association of Governments. On April 4, 2024, SCAG adopted Connect SoCal—the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (2024–2050 RTP/SCS) for the SCAG region.[56] In general, the SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce vehicle miles traveled from automobiles and light-duty trucks and thereby reduce GHG emissions from these sources. For the SCAG region, CARB has set GHG reduction targets at 19 percent below 2005 per capita emissions levels by 2035. The RTP/SCS lays out a strategy for the region to meet these targets. Overall, the SCS is meant to provide growth strategies that will achieve the regional GHG emissions reduction targets. Land use strategies to achieve the region's targets include planning for new growth around high-quality transit areas and livable corridors, and creating neighborhood mobility areas to integrate land use and transportation and plan for more

55 SCAQMD. 2008b. *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans.*

56 Southern California Association of Governments (SCAG). 2024. Connect SoCal: The 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. Website: https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547(accessed May 13, 2024).

active lifestyles.[57] However, the SCS does not require that local General Plans, Specific Plans, or zoning be consistent with the SCS; SCAG is required to consider local land use controls when drafting the SCS.

4.5.2.4 Local Regulations

The City of Cypress does not currently have an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

4.5.3 Existing Environmental Setting

Global climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans in recent decades. The Earth's average near-surface atmospheric temperature rose 0.6 ± 0.2° Celsius or 1.1 ± 0.4° Fahrenheit in the 20th century. The prevailing scientific opinion on climate change is that most of the warming observed over the last 50 years is attributable to human activities. The increased amounts of CO_2 and other GHGs are the primary causes of the human-induced component of warming. GHGs are released by the burning of fossil fuels, land clearing, agriculture, and other activities, and lead to an increase in the greenhouse effect.[58]

GHGs are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced global climate change are:

- CO_2
- CH_4
- N_2O
- HFCs
- PFCs
- SF_6

Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere, and enhancing the natural greenhouse effect, which is believed to be causing global warming. While manmade GHGs include naturally occurring GHGs such as CO_2, methane, and N_2O, some gases, like HFCs, PFCs, and SF_6 are completely new to the atmosphere.

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57 Southern California Association of Governments (SCAG). 2024. Connect SoCal: The 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. Website: https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547(accessed May 13, 2024).

58 The temperature on Earth is regulated by a system commonly known as the "greenhouse effect." Just as the glass in a greenhouse lets heat from sunlight in and reduces the heat escaping, greenhouse gases like carbon dioxide, methane, and nitrous oxide in the atmosphere keep the Earth at a relatively even temperature. Without the greenhouse effect, the Earth would be a frozen globe; thus, although an excess of greenhouse gas results in global warming, the naturally occurring greenhouse effect is necessary to keep our planet at a comfortable temperature.

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation. For the purposes of this air quality analysis, the term "GHGs" will refer collectively to the six gases listed above.

These gases vary considerably in terms of Global Warming Potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The global warming potential is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time that the gas remains in the atmosphere ("atmospheric lifetime"). The GWP of each gas is measured relative to CO_2, the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO_2 over a specified time period. GHG emissions are typically measured in terms of pounds or tons of "CO_2 equivalents" (CO_2e). **Table 4.5.2** shows the GWP for each type of GHG. For example, SF_6 is 23,900 times more potent at contributing to global warming than CO_2.

Table 4.5.2: Global Warming Potential of Greenhouse Gases

Gas	Atmospheric Lifetime (Years)	Global Warming Potential (100-Year Time Horizon)
Carbon Dioxide	50-200	1
Methane	12	25
Nitrous Oxide	114	310
HFC-23	270	11,700
HFC-134a	14	140
HFC-152a	1.4	140
PFC: Tetrafluoromethane (CF_4)	50,000	6,500
PFC: Hexafluoromethane (C_2F_6)	10,000	9,200
Sulfur Hexafluoride (SF_6)	3,200	23,900

Source: *Second Update to the Climate Change Scoping Plan: Building on the Framework* (CARB 2017a).
HFC = hydrofluorocarbons
PFC = perfluorocarbons

The following discussion summarizes the characteristics of the six GHGs and black carbon

4.5.3.1 Carbon Dioxide

In the atmosphere, carbon generally exists in its oxidized form, as CO_2. Natural sources of CO_2 include the respiration (breathing) of humans, animals and plants, volcanic outgassing, decomposition of organic matter and evaporation from the oceans. Human-caused sources of CO_2 include the combustion of fossil fuels and wood, waste incineration, mineral production, and deforestation. Natural sources release approximately 150 billion tons of CO_2 each year, far outweighing the 7 billion tons of man-made emissions of CO_2 each year. Nevertheless, natural removal processes, such as photosynthesis by land- and ocean-dwelling plant species, cannot keep pace with this extra input of man-made CO_2; consequently, the gas is building up in the atmosphere.

In 2021, total annual CO_2 accounted for 81.2 percent of California's overall GHG emissions.[59] Transportation is the single largest source of CO_2 in California, which is primarily composed of on-road travel. Electricity production and industrial and residential sources also make important contributions to CO_2 emissions in California.

4.5.3.2 Methane

CH_4 is produced when organic matter decomposes in environments lacking sufficient oxygen. Natural sources include wetlands, termites, and oceans. Decomposition occurring in landfills accounts for the majority of human-generated CH_4 emissions in California and in the United States as a whole. Agricultural processes such as intestinal fermentation, manure management, and rice cultivation are also significant sources of CH_4 in California. Total annual emissions of CH_4 accounted for 9.8 percent of GHG emissions in California in 2021.[60]

4.5.3.3 Nitrous Oxide

N_2O is produced naturally by a wide variety of biological sources, particularly microbial action in soils and water. Tropical soils and oceans account for the majority of natural source emissions. Nitrous oxide is a product of the reaction that occurs between nitrogen and oxygen during fuel combustion. Both mobile and stationary combustion emit N_2O, and the quantity emitted varies according to the type of fuel, technology, and pollution control device used, as well as maintenance and operating practices. Agricultural soil management and fossil fuel combustion are the primary sources of human-generated N_2O emissions in California. Nitrous oxide emissions accounted for 3.5 percent of GHG emissions in California in 2021.[61]

4.5.3.4 Hydrofluorocarbons, Perfluorocarbons, and Sulfur Hexafluoride

HFCs are primarily used as substitutes for ozone-depleting substances regulated under the Montreal Protocol.[62] PFCs and SF_6 are emitted from various industrial processes, including aluminum smelting, semiconductor manufacturing, electric power transmission and distribution, and magnesium casting. There is no aluminum or magnesium production in California; however, the rapid growth in

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59 California Air Resources Board (CARB). 2022b. GHGs Descriptions and Sources in California. Website: ww2.arb.ca.gov/ghg-descriptions-sources (accessed May 13, 2024).

60 United States Environmental Protection Agency (USEPA). 2023. Inventory of U.S. Greenhouse Gas Emissions and Sinks. Website: https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks#:~:text=In%202021%2C%20U.S.%20greenhouse%20gas,sequestration%20from%20the%20land%20sector (accessed May 13, 2024).

61 United States Environmental Protection Agency (USEPA). 2023. Inventory of U.S. Greenhouse Gas Emissions and Sinks. Website: https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks#:~:text=In%202021%2C%20U.S.%20greenhouse%20gas,sequestration%20from%20the%20land%20sector (accessed May 13, 2024).

62 The Montreal Protocol is an international treaty that was approved on January 1, 1989, and was designated to protect the ozone layer by phasing out the production of several groups of halogenated hydrocarbons believed to be responsible for ozone depletion.

the semiconductor industry leads to greater use of PFCs. HFCs, PFCs, and SF_6 accounted for about 5.6 percent of GHG emissions in California in 2021.[63]

4.5.4 Emissions Sources and Inventories

4.5.4.1 Global Emissions

Worldwide emissions of GHGs in 2020 totaled 22.9 billion MT of CO_2e. Global estimates are based on country inventories developed as part of the programs of the United Nations Framework Convention on Climate Change.[64]

4.5.4.2 United States Emissions

In 2022, the year for which the most recent data are available, the United States emitted about 6,343 million metric tons of CO_2e (MMT CO_2e). Overall, emissions in 2022 increased by 1 percent relative to the 2021 total GHG emissions. This increase in total GHG emissions was driven by fossil fuel combustion due primarily to increased energy use, due inpart to the continued rebound in economic activity after the height of the COVID-19 pandemic. However, GHG emissions in 2022 were 17 percent below those of 2005 levels. Of the five major sectors—residential and commercial, agricultural, industry, transportation, and electricity generation—transportation accounted for the highest amount of GHG emissions in 2022 (approximately 28 percent), with electricity generation second at 25 percent and emissions from industry third at 23 percent.[65]

4.5.4.3 State of California Emissions

The State emitted 381.3 MMT CO_2e emissions in 2021, 12.6 MMT CO_2e higher than 2020 levels but 23.1 MMT CO_2e below the 2019 levels.[66] CARB estimates that transportation was the source of 38 percent of the State's GHG emissions in 2021, which is a 7.4 percent higher than the 2020 emissions. This increase was most likely from passenger vehicles whose activity and emissions rebounded after the COVID-19 pandemic. The next largest sources included industrial sources at approximately 19 percent and electricity generation at 16 percent. The remaining sources of GHG emissions were commercial and residential activities at 10 percent, agriculture at 8 percent, high GWP at 6 percent, and waste at 2 percent.[67]

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63 CARB. 2021. *2022 Scoping Plan Update*. May 10. Website: https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf (accessed June 2024).

64 United Nations Framework Convention on Climate Change. 2022. GHG Data from UNFCCC. Website: https://di.unfccc.int/time_series (accessed May 13, 2024).

65 USEPA. 2023. Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2022. Website: https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks (accessed May 13, 2024).

66 CARB. 2023. *California Greenhouse Gas Emissions for 2000 to 2021, Trends of Emissions and Other Indicators Report*. Website: https://ww2.arb.ca.gov/sites/default/files/2023-12/2000_2021_ghg_inventory_trends.pdf (accessed May 13, 2024).

67 Ibid.

4.5.5 Methodology

The proposed project would result in GHG emissions from construction and operational sources. Construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. Operational activities would also generate emissions at the project site from area, mobile, stationary, waste, and water sources as well as indirect emissions from sources associated with energy consumption. This analysis used the CalEEMod version 2022.1. to quantify the potential GHG emissions associated with both construction and operation of the proposed project.

4.5.6 Thresholds of Significance

The thresholds for greenhouse gas emissions impacts used in this analysis are consistent with Appendix G of the State CEQA Guidelines and the City's Initial Study/Environmental Checklist. The proposed project may be deemed to have a significant impact with respect to GHG emissions if it would:

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

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

4.5.6.1 Regional Emissions Thresholds

To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, SCAQMD convened a GHG CEQA Significance Threshold Working Group (Working Group). Based on the last Working Group meeting held in September 2010 (Meeting No. 15), SCAQMD proposed to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency:

- **Tier 1. Exemptions:** If a project is exempt from CEQA, project-level and cumulative GHG emissions are less than significant.

- **Tier 2. Consistency with a locally adopted GHG Reduction Plan:** If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project's geographic area (i.e., city or county), project-level and cumulative GHG emissions are less than significant.

- **Tier 3. Numerical Screening Threshold:** If GHG emissions are less than the numerical screening-level threshold, project-level and cumulative GHG emissions are less than significant.

  For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, SCAQMD requires an assessment of GHG emissions. SCAQMD, under Option 1, is proposing a "bright-line" screening-level threshold of 3,000 metric tons of CO_2e per year (MT CO_2e/yr) for all land use types or, under Option 2, the following land-use-specific thresholds:

1,400 MT CO_2e for commercial projects, 3,500 MT CO_2e for residential projects, or 3,000 MT CO_2e for mixed-use projects. This bright-line threshold is based on a review of the Governor's Office of Planning and Research database of CEQA projects. Based on their review of 711 CEQA projects, 90 percent of CEQA projects would exceed the bright-line thresholds identified above. Therefore, projects that do not exceed the bright-line threshold would have a nominal and therefore less than cumulatively considerable impact on GHG emissions.

- **Tier 4. Performance Standards:** If emissions exceed the numerical screening threshold, a more detailed review of the project's GHG emissions is warranted. SCAQMD has proposed an efficiency target for projects that exceed the bright-line threshold. The current recommended approach is per capita efficiency targets. SCAQMD is not recommending use of a percentage emissions reduction target. Instead, SCAQMD proposes a 2020 efficiency target of 4.8 MT CO_2e/yr per service population (MT CO_2e/yr/SP) for project-level analyses and 6.6 MT CO_2e/yr/SP for plan-level projects (e.g., program-level projects such as general plans). In addition, GHG reductions by the SB 375 target date of 2035 would be approximately 40 percent. This 40 percent reduction was applied to the 2020 targets, resulting in an efficiency threshold for plans of 4.1 MT CO_2e/yr/SP and an efficiency threshold at the project level of 3.0 MT CO_2e/yr/SP. The GHG efficiency metric divides annualized GHG emissions by the service population, which is the sum of residents and employees, per the following equation:

  Rate of Emission: GHG Emissions (MT CO_2e/yr) ÷ Service Population

  The efficiency evaluation consists of comparing the project's efficiency metric to efficiency targets. Efficiency targets represent the maximum quantity of emissions each resident and employee in the State of California could emit in various years based on emission levels necessary to achieve the statewide GHG emissions reduction goals. A project that results in a lower rate of emissions would be more efficient than a project with a higher rate of emissions, based on the same service population. The metric considers GHG reduction measures integrated into a project's design and operation (or through mitigation).

The 3,000 MT CO_2e/yr threshold is based on a 90 percent emission "capture" rate methodology. Prior to its use by the SCAQMD, the 90 percent emissions capture approach was one of the options suggested by the California Air Pollution Control Officers Association in its CEQA & Climate Change white paper.[68] A 90 percent emission capture rate means that unmitigated GHG emissions from the top 90 percent of all GHG-producing projects within a geographic area—the South Coast Air Basin (Basin) in this instance—would be subject to a detailed analysis of potential environmental impacts from GHG emissions, while the bottom 10 percent of all GHG-producing projects would be excluded from detailed analysis. A GHG significance threshold based on a 90 percent emission capture rate is appropriate to address the long-term adverse impacts associated with global climate change, because medium and large projects will be required to implement measures to reduce GHG emissions, while small projects, which are generally infill development projects that are not the

[68] SCAQMD. 2008b. *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans*. December 5. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2 (accessed May 13, 2024).

focus of the State's GHG reduction targets, are allowed to proceed. Further, a 90 percent emission capture rate sets the emission threshold low enough to capture a substantial proportion of future development projects and demonstrate that cumulative emissions reductions are being achieved while setting the emission threshold high enough to exclude small projects that will, in aggregate, contribute approximate 1 percent of projected statewide GHG emissions in the Year 2050.[69]

In setting the threshold at 3,000 MT CO_2e/yr, SCAQMD researched a database of projects kept by the Governor's Office of Planning and Research. That database contained 798 projects, 87 of which were removed because they were very large projects and/or outliers that would skew emissions values too high, leaving 711 as the sample population to use in determining the 90th percentile capture rate.[70] The SCAQMD analysis of the 711 projects within the sample population combined commercial, residential, and mixed-use projects. Emissions from each of these projects were calculated by SCAQMD to provide a consistent method of emissions calculations across the sample population and from projects within the sample population. In calculating the emissions, the SCAQMD analysis determined that the 90th percentile ranged between 2,983 to 3,143 MT CO_2e/yr.[71] The SCAQMD set its significance threshold at the low-end value of the range when rounded to the nearest hundred tons of emissions (i.e., 3,000 MT CO_2e/yr) to define small projects that are considered less than significant and do not need to provide further analysis.

The City understands that the 3,000 MT CO_2e/yr threshold for residential/commercial uses was proposed by SCAQMD a decade ago and was adopted as an interim policy; however, no permanent, superseding policy or threshold has since been adopted. The 3,000 MT CO_2e/yr threshold was developed and recommended by SCAQMD, an expert agency, based on substantial evidence as provided in the Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold[72] document and subsequent Working Group meetings (the latest of which took place in 2010). SCAQMD has not withdrawn its support of the interim threshold and all documentation supporting the interim threshold remains on the SCAQMD website on a page that provides guidance to CEQA practitioners for air quality analysis (and where all SCAQMD significance thresholds for regional and local criteria pollutants and toxic air contaminants also are listed). Further, as stated by SCAQMD, this threshold "uses the Executive Order S-3-05 goal [80 percent below 1990 levels by 2050] as the basis for deriving the screening level" and, thus, remains valid for use in 2023.[73] Lastly, this threshold has been used for hundreds, if not thousands, of GHG analyses performed for projects within the Basin. Although the threshold was never formally adopted by SCAQMD and is therefore

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69 SCAQMD. 2008b. *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans*. December 5. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2 (accessed May 13, 2024).

70 SCAQMD. 2009. *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13*. August 26. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-13/ghg-meeting-13-minutes.pdf?sfvrsn=2 (accessed May 13, 2024).

71 Ibid.

72 SCAQMD. 2008a. *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*. October. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2 (accessed May 13, 2024).

73 Ibid.

not considered legally binding, it has been included in the discussion below in order to provide full disclosure and consistency with other CEQA documents produced by the City and other jurisdictions within the Basin. This inclusion complements the analysis of compliance with applicable air quality documents, such as the 2022 Scoping Plan and the 2020–2045 RTP/SCS presented under Threshold GHG-2 below.

For the purpose of this analysis, the proposed project will first be compared to the SCAQMD screening-level Tier 3 Numerical Screening Threshold of 3,000 MT CO_2e/yr for all land use type projects. If it is determined that the proposed project is estimated to exceed this numerical threshold, it will then be compared to the SCAQMD-recommended 2035 efficiency-based threshold of 4.1 MT CO_2e/yr per service population for plan-level projects. As previously stated, the proposed project is also evaluated for compliance with the 2022.

4.5.7 Project Impacts

Threshold GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact GHG-1: Less Than Significant Impact. This section describes the potential construction- and operational-related GHG emissions associated with the proposed project. SCAQMD has not addressed emission thresholds for construction in its *CEQA Air Quality Handbook*; however, SCAQMD requires quantification and disclosure. Thus, this section discusses construction emissions.

Construction Greenhouse Emissions. Demolition and construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

The SCAQMD does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are required to quantify and disclose GHG emissions that would occur during construction. The SCAQMD suggests that construction GHG emissions be amortized over the life of the project (defined as 30 years), added to the operational emissions, and compared to the applicable interim GHG significance threshold tier.

Using the CalEEMod, it is estimated that the proposed project would generate a total of approximately 536.4 MT CO_2e during construction of the project. When annualized over the 30-year life of the project, annual emissions would be 17.9 MT CO_2e.

Operational Greenhouse House Gas Emissions. Long-term operation of the proposed project would generate GHG emissions from area, mobile, stationary, waste, and water sources as well as indirect emissions from sources associated with energy consumption. Mobile-source GHG emissions would include project-generated vehicle trips. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site, and other sources. Waste source emissions generated by the proposed project include energy generated by landfilling and other

methods of disposal related to transporting and managing project-generated waste. In addition, water source emissions associated with the proposed project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment.

Long-term operation emissions associated with the proposed project were calculated using CalEEMod. The proposed project analysis was conducted using land use codes *Refrigerated Warehouse No-Rail* and *Parking Lot*. Trip generation rates used in CalEEMod for the proposed project were based on the project's trip generation estimates identified in the proposed project's Traffic Analysis.[74] The proposed project would generate a total of 406 average daily trips (ADT), including 262 passenger vehicle trips, 50 two-axle truck trips, 16 three-axle truck trips, and 78 four-axle truck trips, which were included in CalEEMod. This analysis assumes that the four+-axle truck trips would travel approximately 40 miles. To be conservative, separate CalEEMod analyses were prepared for the operational analysis for the proposed project. One CalEEMod run evaluated operational and vehicle trip emissions and another CalEEMod run evaluated four+-axle truck trip emissions. When project-specific data were not available, default assumptions from CalEEMod were used to estimate project emissions.

In addition, long-term operational emissions associated with the existing uses were evaluated in CalEEMod. The project site is developed with an existing 150,626-square-foot office building; however, a total of 61,616 square feet (41 percent) of space was occupied as of August 2022. It was conservatively assumed in the Traffic Analysis that only 37,657 (25 percent) of the building was occupied. Therefore, the existing uses analysis evaluates 37,657 square feet of existing office uses and the Traffic Analysis identifies an existing trip generation of 408 ADT associated with the 37,657-square-foot occupied space.

Table 4.5.3 shows the calculated GHG emissions for the proposed project. As shown in **Table 4.5.3**, mobile sources would be the largest source of GHG emissions for the proposed project at approximately 61 percent of the total project emissions. Energy sources would be the next largest category at approximately 33 percent. Water sources would be approximately 4 percent of the total emissions and waste sources would be approximately 2 percent of the total emissions. Area sources would be approximately less than 1 percent of the total emissions.

As discussed above, according to SCAQMD, a project would have less than significant GHG emissions if it would result in operational-related GHG emissions of less than 3,000 MT CO_2e/yr. Based on the analysis results, the proposed project would result in a net increase of 2,925.9 MT CO_2e/yr over existing conditions, which would be below the numeric threshold of 3,000 MT CO_2e. Therefore, operation of the proposed project would not generate significant GHG emissions that would have a significant effect on the environment. As such, impacts related to operational GHG emissions would be less than significant. No mitigation is required.

[74] Urban Crossroads. 2023. *Goodman Commerce Center Traffic Analysis*. November 21, 2023.

Table 4.5.3: GHG Emissions (MT/yr)

Emission Type	Operational Emissions				
	CO_2	CH_4	N_2O	CO_2e	Percentage of Total
Existing Uses GHG Emissions					
Mobile Sources	407.7	<0.1	<0.1	414.4	63
Area Sources	0.8	<0.1	<0.1	0.8	<1
Energy Sources	212.6	<0.1	<0.1	213.3	32
Water Source	13.1	0.2	<0.1	20.1	3
Waste Source	3.1	0.3	0.0	10.9	2
Total Existing Uses Emissions				659.5	-
Proposed Project GHG Emissions					
Mobile Sources	330.8	<0.1	<0.1	336.1	9
Mobile Sources – Heavy Heavy Duty Trucks	1,778.1	0.1	0.3	1,867.7	52
Area Sources	3.9	<0.1	<0.1	3.9	<1
Energy Sources	1,166.0	0.1	<0.1	1,170.1	33
Water Sources	87.0	1.4	<0.1	133.4	4
Waste Sources	16.1	1.6	0.0	56.2	2
Total Operational Emissions				**3,567.4**	**100**
Amortized Construction Emissions				**17.9**	**-**
Total Annual Emissions				**3,585.3**	**-**
Total Net Annual Emissions				**2,925.9**	
SCAQMD Threshold				**3,000**	**-**
Exceeds Threshold?				**No**	**-**

Source: LSA (June 2024).
GHG = greenhouse gas
MT/yr = metric tons per year
SCAQMD = South Coast Air Quality Management District

Threshold GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact GHG-2: Less Than Significant Impact. The City, as a lead agency, may assess the significance of GHG emissions by determining a project's consistency with a local GHG reduction plan that qualifies under Section 15183.5 of the State CEQA Guidelines. The City of Cypress has not adopted a GHG reduction plan. In addition, the City has not completed the GHG inventory, benchmarking, and goal-setting process required to identify a reduction target and to take advantage of the streamlining provisions contained in the State CEQA Guidelines amendments adopted in SB 97.

2022 Scoping Plan. EO B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan, to reflect the 2030 target set by EO B-30-15 and codified by Senate Bill (SB) 32. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. The companion bill to SB 32, AB 197, provides additional direction to the CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 intended to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

The 2022 Scoping Plan Update[75] assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan Update focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

As identified above, the 2022 Scoping Plan Update contains GHG reduction measures that work toward reducing GHG emissions, consistent with the targets set by EO B-30-15 and codified by SB 32 and AB 197. The measures applicable to the proposed project include energy efficiency measures, water conservation and efficiency measures, and transportation and motor vehicle measures, as discussed below.

Energy efficiency measures are intended to maximize energy-efficient building and appliance standards; pursue additional efficiency efforts, including new technologies and new policy and implementation mechanisms; and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. As identified above, the proposed project would comply with the latest California Green Building Standards (CALGreen Code) regarding energy conservation and green building infrastructure. Therefore, the proposed project would comply with applicable energy measures.

Water conservation and efficiency measures are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As noted above, the project would be required to comply with the latest CALGreen Code standards, which include a variety of different measures, including reduction of wastewater and water use. The proposed project would also include drought tolerant landscape and would be required to comply with the California Model Water Efficient Landscape Ordinance. Therefore, the proposed project would not conflict with any of the water conservation and efficiency measures.

The goal of transportation and motor vehicle measures is to develop regional GHG emission reduction targets for passenger vehicles. Specific regional emission targets for transportation emissions would not directly apply to the proposed project. However, vehicles traveling to the project site would comply with the Pavley II (LEV III) Advanced Clean Cars Program. The second phase of Pavley standards will reduce GHG emissions from new cars by 34 percent from 2016 levels by 2025. Therefore, the proposed project would not conflict with the identified transportation and motor vehicle measures.

The proposed project would comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals.

2024–2050 RTP/SCS. The SCAG 2024–2050 RTP/SCS was adopted on April 4, 2024. SCAG's RTP/SCS identifies that land use strategies that focus on new housing and job growth in areas served by high-

[75] California Air Resources Board (CARB). 2022. California's 2022 Climate Change Scoping Plan. November.

quality transit and other opportunity areas would be consistent with a land use development pattern that supports and complements the proposed transportation network. The core vision in the 2024–2050 RTP/SCS is to better manage the existing transportation system through design management strategies, integrate land use decisions and technological advancements, create complete streets that are safe to all roadway users, preserve the transportation system, and expand transit and foster development in transit-oriented communities. The 2024–2050 RTP/SCS contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as a forecasted development pattern that is generally consistent with regional-level General Plan data. The forecasted development pattern, when integrated with the financially constrained transportation investments identified in the 2024–2050 RTP/SCS, would reach the regional target of reducing GHG emissions from automobiles and light-duty trucks by 19 percent per capita by 2035 (compared to 2005 levels). The 2024–2050 RTP/SCS does not require that local General Plans, Specific Plans, or zoning be consistent with the 2024–2050 RTP/SCS, but it does provide incentives for consistency to governments and developers.

Implementing SCAG's RTP/SCS will greatly reduce the regional GHG emissions from transportation, helping to achieve statewide emissions reduction targets. The proposed project would not conflict with the stated goals of the RTP/SCS; therefore, the proposed project would not interfere with SCAG's ability to achieve the region's GHG reduction targets of 19 percent below 2005 per capita emissions levels by 2035, and it can be assumed that regional mobile emissions would decrease in line with the goals of the RTP/SCS. Furthermore, the proposed project is not regionally significant per State CEQA Guidelines Section 15206, and, as such, it would not conflict with the SCAG RTP/SCS targets since those targets were established and are applicable on a regional level.

The proposed project would consist of a 191,394-square-foot light industrial building. Based on the nature of the proposed project, it is anticipated that implementation of the proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS. Therefore, the proposed project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Impacts would be less than significant, and no mitigation is required.

4.5.8 Level of Significance Prior to Mitigation

The proposed project would not result in any significant impacts related to GHG emissions, and no mitigation is required.

4.5.9 Regulatory Compliance Measures and Mitigation Measures

The proposed project would not result in any significant impacts related to GHG emissions, and no mitigation is required.

4.5.10 Level of Significance after Mitigation

The proposed project would not result in any significant impacts related to GHG emissions.

4.5.11 Cumulative Impacts

Cumulative impacts are the collective impacts of one or more past, present, or reasonably foreseeable probable future projects, that when combined, result in adverse changes to the

environment. Climate change is a global environmental problem in which: (1) any given development project contributes only a small portion of any net increase in GHGs, and (2) global growth is continuing to contribute large amounts of GHGs across the world. Land use projects may contribute to the phenomenon of global climate change in ways that would be experienced worldwide, and with some specific effects felt in California. However, no scientific study has established a direct causal link between individual land use project impacts and global warming.

Table 4.1: Summary of Cumulative Projects identifies the past, present, and reasonably foreseeable probable future projects that when considered with the proposed project could result in cumulative impacts. The analysis of impacts related to GHG emissions is inherently cumulative. Potential cumulative impacts would occur if the proposed project, when considered with the cumulative projects would result in significant impacts to GHGs. As discussed in Section 4.5.7, while the proposed project would generate GHGs as part of project construction and operations, these emissions would not exceed applicable thresholds. In addition, the proposed project would not conflict with applicable statewide and regional climate action plans and policies. Therefore, the proposed project's GHG emissions would not be cumulatively considerable and cumulative impacts associated with the proposed project would be less than significant.

4.6 NOISE

This section evaluates the potential short-term and long-term noise impacts associated with the construction and operation of the 5665 Plaza Drive Project (proposed project). This section is based in part on information provided in the Noise Element of the City of Cypress General Plan. The assumptions used in the noise analysis and the noise modeling results are provided in **Appendix G** of this Draft EIR.

4.6.1 Scoping Process

The City received 3 comment letters during the public review period for the NOP. For copies of the NOP comment letters, refer to **Appendix A** of this Draft EIR. One comment letter included comments related to noise.

The letter from Los Alamitos received on June 5, 2024, suggest that the Draft EIR should evaluate the proposed project's noise impact from the proposed land use change, proximity to sensitive receptors, and maximum noise levels indicates in the applicable General Plans (including the City of Los Alamitos General Plan).

The Letter from Warland Investments Company and Affiliated Entities received on June 5, 2024, suggest that the proposed project has a foreseeable use as a logistics center, stating that logistics centers can generate more significant noise impacts than typical warehousing projects.

4.6.2 Regulatory Setting

4.6.2.1 Federal Regulations

Federal Transit Administration. The USDOT Federal Transit Administration (FTA) identifies guidelines for the maximum acceptable vibration levels for different types of land uses. These guidelines are based on the potential for interference or annoyance from vibration levels in a building and the potential for building damage. According to the FTA, ground vibrations from construction activities generally do not reach levels that can damage structures, but they can achieve the audible and feel-able ranges in buildings very close to the construction site. Exceptions include non-engineered timber and masonry buildings such as residential buildings and old or fragile buildings, where special care must be taken to avoid damage. Construction activity can result in varying degrees of ground-borne vibration, depending on the equipment and methods used, distance to the affected structures, and soil type. Construction vibration is generally associated with pile driving and rock blasting. Other construction equipment, such as air compressors, light trucks, and hydraulic loaders, generates little or no ground vibration.

4.6.2.2 State Regulations

Noise Control Act (Health & Safety Code §§ 46000-46080). The California Noise Control Act states that excessive noise is a serious hazard to public health and welfare and that it is the policy of the State to provide an environment for all Californians that is free from noise that jeopardizes their health or welfare. The goal is to minimize the number of people that would be exposed to excessive noise but not create an environment completely free from any noise.

State of California General Plan Guidelines. The State of California regulates vehicular and freeway noise affecting classrooms, sets standards for sound transmission and occupational noise control, and identifies noise insulation standards and airport noise/land-use compatibility criteria. The State of California OPR's 2017 *General Plan Guidelines* (OPR 2017), also provide guidance for the acceptability of projects within specific Community Noise Equivalent Level (CNEL)/day-night average noise level (L_{dn}) contours. The General Plan Guidelines present adjustment factors that may be used in order to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution.

4.6.2.3 Regional Regulations

There are no regional regulations related to noise that are applicable to the proposed project.

4.6.2.4 Local Regulations

City of Cypress General Plan. The development of effective strategies to reduce impacts of excessive noise is an essential part of the land use planning process. Since 1971, the Noise Element has been one of the seven mandatory elements of a General Plan. The Noise Element requires that noise sources be considered in establishing land use patterns so as to minimize exposure of residents to excessive noise. The Noise Element of the City's General Plan[76] works to achieve and maintain environmental noise levels compatible with land use by establishing goals, policies, and programs to ensure that Cypress residents will be protected from excessive noise. The City's Noise Element serves as a guideline for compliance with the State's noise insulation standards. Applicable Noise Element objectives and policies include the following:

- **N-1** Reduce noise impacts from transportation noise sources.
- **N-2** Incorporate noise considerations into land use planning decisions.
- **N-3** Minimize noise spillover from commercial uses into nearby residential neighborhoods.
- **N-4** Minimize the noise impacts associated with the development of residential units above ground floor commercial uses in mixed use developments.
- **N-5** Develop measures to control non-transportation noise impacts.

Additionally, the City's General Plan Noise Element has established interior and exterior noise standards for various land use categories shown in **Table 4.6.1**. As shown in **Table 4.6.1**, the City's exterior and interior noise standards are 50–60 A-weighted decibels (dBA) CNEL and 45–55 dBA CNEL, respectively, for single- and multifamily residences. It should be noted that the City's exterior noise standard only applies to private yards of single-family residences, private patios, or balconies

[76] City of Cypress. 2001. *City of Cypress General Plan* Noise Element. <https://www.cypressca. org/home/showpublisheddocument/718/636123119313270000> (accessed June 3, 2023).

Table 4.6.1: City of Cypress Interior and Exterior Noise Standards

Land Use Categories		dBA CNEL	
Categories	**Uses**	**Interior[1]**	**Exterior[2]**
Residential	Single Family Duplex, Multiple Family	45[3]–55	50–60
	Mobile Home	45	65[4]
Commercial Industrial	Hotel, Motel, Transient Lodging	45	--
	Commercial Retail, Bank, Restaurant	55	--
	Office Building, Research and Development, Professional Offices, City Office Building	50	--
	Amphitheater, Concert Hall Auditorium, Meeting Hall	45	--
	Gymnasium (Multipurpose)	50	--
	Sports Club	55	--
	Manufacturing, Warehousing, Wholesale, Utilities	65	--
	Movie Theaters	45	--
Institutional	Hospital, Schools' Classrooms	45	65
	Church, Library	45	--
Open Space	Parks	--	65

Source: City of Cypress General Plan Noise Element, Table N-3.

[1] Indoor environmental including: bedrooms, living areas, bathrooms, toilets, closets, corridors.

[2] Outdoor environments limited to: private yards of single-family residences, private patios, or balconies of multifamily residences which are served by a means of exit from inside the dwelling (balconies 6 ft deep or less are exempt), mobile home parks, park picnic areas, and school playgrounds.

[3] Noise level requirement with closed windows. Mechanical ventilation system or other means of natural ventilation shall be provided as of Chapter 12, Section 1205 of the Uniform Building Code.

[4] Exterior noise levels should be such that interior noise levels will not exceed 45 dBA CNEL.

CNEL = Community Noise Equivalent Level

dBA = A-weighted decibels

of multifamily residences which are served by a means of exit from inside the dwelling, mobile home parks, park picnic areas, and school playgrounds. Multifamily residences with balconies that are 6 feet deep or less are exempt from the City's exterior noise standard. Although the City's interior noise standard is 45–55 dBA CNEL, the interior noise standard of 45 dBA CNEL was used for a conservative noise analysis.

Although the City has not adopted exterior noise standards for hotels, movie theaters, and commercial uses, the City has established an interior noise standard of 45 dBA CNEL for hotels and movie theaters and an interior noise standard of 55 dBA CNEL for commercial retail and restaurant uses.

City of Cypress Municipal Code. The Cypress Municipal Code Chapter 13, Article VII, Sections 13-64 through 13-79, establish noise standards and enforcement procedures to enforce the reduction of "obnoxious or offensive" noises.

More specifically, Chapter 13, Article VII, Sections 13-67 through 13-69, establish the noise zone designations, exterior noise level standards, and interior noise level standards. Section 13-67 specifies that residential properties in the City are assigned to the following noise zones:

> **Noise Zone 1:** All residential properties zoned RS-15000 or RS-6000 (low-density residential uses with a maximum of 5 dwelling units per gross acre).
>
> **Noise Zone 2:** All residential property not in Noise Zone 1.

Section 13-68 (a), as shown in **Table 4.6.2**, presents the exterior noise level standards for Noise Zone 2, which would apply to the proposed project as the nearest sensitive uses are not zoned RS-15000 or RS-6000. In the event the alleged offensive noise consists of impact noise, simple tone noise, speech, music, or any combination thereof, each of the above noise levels shall be reduced by 5 dBA.

Table 4.6.2: Exterior Noise Level Standards

Noise Zone	Noise Level (dBA L_{eq})	Time Period
1	55	7:00 a.m. – 10:00 p.m.
	50	10:00 p.m. – 7:00 a.m.
2	60	7:00 a.m. – 10:00 p.m.
	55	10:00 p.m. – 7:00 a.m.

Source: City of Cypress Municipal Code Section 13-68 (a) (1976).
dBA = A-weighted decibels
L_{eq} = Average Hourly Noise Level

Section 13-68 of the Cypress Municipal Code goes on to state in subsection (b) the following:

> "It shall be unlawful for any person at any location within the incorporated area of the city to create any noise, or to allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person, when the foregoing causes the noise level, when measured on any other residential property, either incorporated or unincorporated, to exceed:"
>
> (1) The noise standard for a cumulative period of more than 30 minutes in any hour; or
>
> (2) The noise standard plus 5 dB(A) for a cumulative period of more than 15 minutes in any hour; or
>
> (3) The noise standard plus 10 dB(A) for a cumulative period of more than 5 minutes in any hour; or
>
> (4) The noise standard plus 15 dB(A) for a cumulative period of more than 1 minute in any hour; or
>
> (5) The noise standard plus 20 dB(A) for any period of time.

Subsection (c) also specifies the following:

> "In the event the ambient noise level exceeds either of the first four (4) noise limit categories above, the cumulative period applicable to said category shall be increased to reflect said ambient noise level. In the event the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under said category shall be increased to reflect the maximum ambient noise level."

Section 13-69(a), as shown in **Table 4.6.3**, presents the interior noise level standards for all residential zones.

Table 4.6.3: Interior Noise Level Standards

Noise Zone	Noise Level (dBA L_{eq})	Time Period
1 and 2	55	7:00 a.m. – 10:00 p.m.
	45	10:00 p.m. – 7:00 a.m.

Source: City of Cypress Municipal Code (1976).
dBA = A-weighted decibels
L_{eq} = Average Hourly Noise Level

Section 13-69(a) also states the following for the noise levels shown in **Table 4.6.3**:

> "In the event the alleged offensive noise consists of impact noise, simple tone noise, speech, music, or any combination thereof, each of the above noise levels shall be reduced by five (5) dBA."

Section 13-69(b) of the Cypress Municipal Code states the following:

> "It shall be unlawful for any person at any location within the incorporated area of the city to create any noise, or to allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person, when the foregoing causes the noise level, when measured on any other residential property, either incorporated or unincorporated, to exceed:
>
> (1) The interior noise standard for a cumulative period of more than 5 minutes in any hour; or
>
> (2) The interior noise standard plus 5 dB(A) for a cumulative period of more than 1 minute in any hour; or
>
> (3) The interior noise standard plus 10 dB(A) for any period of time."

Subsection (c) also specifies the following:

> "In the event the ambient noise level exceeds either of the first two (2) noise limit categories above, the cumulative period applicable to said category shall be increased to reflect said ambient noise level. In the event the ambient noise level exceeds the third noise limit category, the maximum allowable noise level under said category shall be increased to reflect the maximum ambient noise level."

Section 13-70, Special Provisions, of the City's Municipal Code specifies that construction activities are exempt from the provisions listed above; however, it regulates the timing of construction activities. According to the Municipal Code, construction activities shall not take place between the hours of 8:00 p.m. and 7:00 a.m. on weekdays, before 9:00 a.m. and after 8:00 p.m. on Saturday, or at any time on Sunday or a federal holiday.

Section 13-71, Schools, hospitals and churches; special provisions, of the Municipal Code states the following:

> "It shall be unlawful for any person to create any noise which causes the noise level at any school, hospital or church while the same is in use, to exceed the noise limits as specified in section 13-68 prescribed for the assigned noise zone in which the school, hospital or church is located, or which noise level unreasonably interferes with the use of such institutions or which unreasonably disturbs or annoys patients in the hospital, provided conspicuous signs are displayed in three (3) separate locations within one-tenth (0.1) of a mile of the institution indicating the presence of a school, church or hospital."

Vibration Standards. Due to the lack of vibration standards within the City's General Plan or Municipal Code, vibration standards included in the FTA's 2018 *Transit Noise and Vibration Impact Assessment Manual* (FTA Manual) are used in this analysis for ground-borne vibration impacts, as shown in **Table 4.6.4**.

Table 4.6.4: Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
Reinforced concrete, steel, or timber (no plaster)	0.50
Engineered concrete and masonry (no plaster)	0.30
Nonengineered timber and masonry buildings	0.20
Buildings extremely susceptible to vibration damage	0.12

Source: *Transit Noise and Vibration Impact Assessment Manual*, Table 12-3 (FTA 2018).
[1] RMS vibration velocity in decibels (VdB) re 1 micro-inch/second.
FTA = Federal Transit Administration
in/sec = inches per second
L_V = velocity in decibels
PPV = peak particle velocity
RMS = root-mean-square
VdB = vibration velocity in decibels

The criteria for environmental impact from ground-borne vibration and noise are based on the maximum levels for a single event. **Table 4.6.4** lists the potential vibration damage criteria associated with construction activities, as suggested in the FTA Manual.

The FTA Manual guidelines show that a vibration level of up to 0.5 inch per second (in/sec) in peak particle velocity (PPV) is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. For a nonengineered timber and masonry building, the construction vibration damage criterion is 0.2 in/sec in PPV.

4.6.3 Existing Environmental Setting

4.6.3.1 Overview of the Existing Noise Environment

The primary existing noise sources in the vicinity of the project site are associated with surface streets such as Valley View Street and Katella Avenue and include automobile and truck activities.

4.6.3.2 Existing Sensitive Land Uses in the Project Vicinity

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Noise-sensitive land uses include residences, hospitals, school classrooms,

churches, libraries, and parks. The closest noise-sensitive use along Plaza Drive is an existing hotel located 130 feet from the roadway. Land uses surrounding the project site include light industrial uses to the uses to the north, east, and west and office uses to the south. Additionally, two light industrial buildings are currently under construction directly east of the project site.

4.6.3.3 Existing Noise Levels

In order to assess the existing noise conditions in the area, long-term (24-hour) noise-level measurements were conducted on October 10 and 11, 2023, using three (3) Larson Davis Spark 706RC Dosimeters at four locations near the edge of the project site. **Figure 4.6.1, Noise Monitoring Locations,** shows the long-term noise monitoring locations. **Table 4.6.5** provides a summary of the measured hourly noise levels and calculated CNEL level from the long-term noise level measurements as well as a brief description of the locations where the measurements were collected. As shown in **Table 4.6.5**, the calculated CNEL levels range from 54.3 dBA CNEL to 62.3 dBA CNEL. Hourly noise levels at surrounding noise-sensitive uses are as low as 41.8 dBA equivalent continuous sound level (L_{eq}) during nighttime hours and 48.8 dBA L_{eq} during daytime hours.

4.6.3.4 Existing Aircraft Noise Levels

The Joint Forces Training Base (JFTB) Los Alamitos is located approximately 0.4 mile southwest of the project site in the City of Los Alamitos. The noise contour boundaries of JFTB show that the project site is located outside of Noise Impact Zone 2 (60 dB CNEL or greater).

4.6.4 Methodology

Evaluation of noise and vibration impacts associated with the proposed project includes the following:

- Determination of the short-term construction noise and vibration impacts.
- Determination of the long-term off-site and on-site traffic noise impacts.
- Determination of the long-term stationary noise impacts from project operations.
- Determination of the required mitigation measures to reduce short-term construction–related noise and vibration impacts and long-term stationary and mobile source noise impacts.

The evaluation of noise and vibration impacts was prepared in conformance with appropriate standards, utilizing procedures and methodologies in the City of Cypress Noise Element and Municipal Code and FTA criteria.

4.6.4.1 Characteristics of Sound

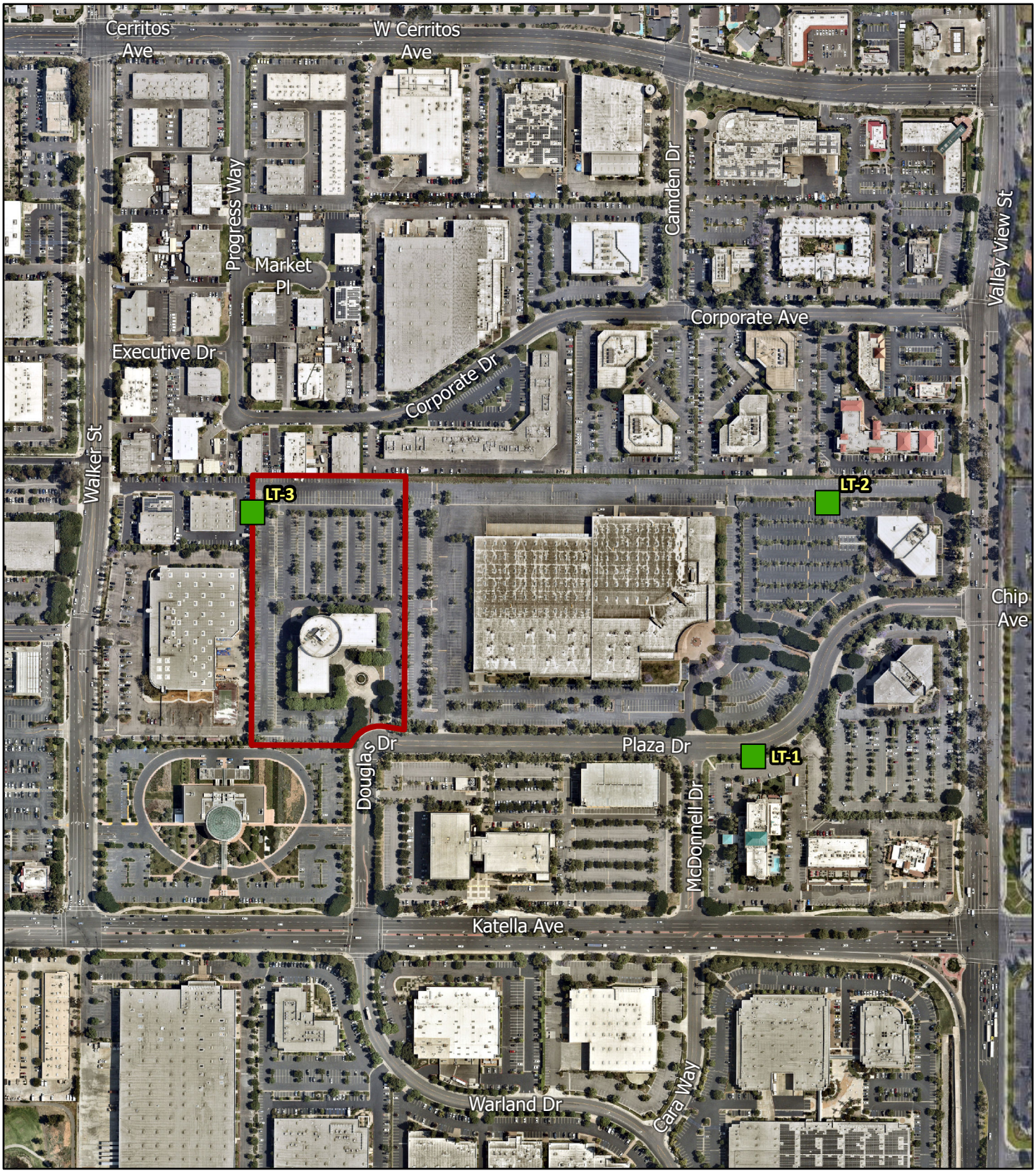
Noise is usually defined as “unwanted sound.” Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, or when it has adverse effects on health.

To the human ear, sound has two important characteristics: pitch and loudness. Pitch is generally an annoyance, while loudness can affect the ability to hear. Pitch is the number of complete vibrations, or cycles per second, of a wave resulting in the tone’s range from high to low.

Table 4.6.5: Existing Noise Level Measurements

Location	Description	Daytime Noise Levels[1] (dBA L_{eq})	Evening Noise Levels[2] (dBA L_{eq})	Nighttime Noise Levels[3] (dBA L_{eq})	Daily Noise Level (dBA CNEL)
LT-1	Approximately 185 ft east of the Plaza Drive and McDonnell Drive intersection.	54.3-68.0	49.7-61.6	46.2-59.0	62.3
LT-2	Approximately 460 ft west of the Valley View Street centerline and approximately 160 ft south of the existing hotel at 5990 Corporate Avenue.	53.8-60.3	50.5-55.7	47.3-54.6	58.8
LT-3	On the western property line of the project site, 455 ft east of the Walker Street centerline and 100 ft south of the northern property line.	48.8-55.8	46.9-55.0	41.8-48.6	54.3

Source: LSA (2023).
Note: Noise measurements were conducted from October 10 to October 11, 2023, starting at 1:00 p.m.
[1] Daytime Noise Levels = noise levels during the hours of 7:00 a.m. to 7:00 p.m.
[2] Evening Noise Levels = noise levels during the hours from 7:00 p.m. to 10:00 p.m.
[3] Nighttime Noise Levels = noise levels during the hours of 10:00 p.m. to 7:00 a.m.
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
ft = foot/feet
L_{eq} = the average noise level during a specific hour
LT = long-term measurement



LSA

Project Site

Long-term Noise Monitoring Location

FIGURE 4.6-1

N

0 200 400

FEET

SOURCE: Nearmap (June 17, 2023)

J:\CCP2201.04\GIS\Pro\Cypress 5665 Plaza Drive Project\Cypress 5665 Plaza Drive Project.aprx (5/18/2024)

5665 Plaza Drive Project Draft Environmental Impact Report

Noise Monitoring Locations

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Loudness is the strength of a sound that describes a noisy or quiet environment and is measured by the amplitude of the sound wave. Loudness is determined by the intensity of the sound waves combined with the reception characteristics of the human ear. Sound intensity is the average rate of sound energy transmitted through a unit area perpendicular to the direction in which the sound waves are traveling. This characteristic of sound can be precisely measured with instruments. In analyzing the potential noise impacts of a proposed project, the existing noise environment in the vicinity of the project site is identified and the potential noise effects of the project are evaluated in terms of sound intensity and the effect on adjacent sensitive land uses.

4.6.4.2 Measurement of Sound

Sound intensity is measured through the A-weighted decibel (dBA) scale to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound similar to the human ear's de-emphasis of these frequencies. Decibels (dB), unlike the linear scale (e.g., inches or pounds), is a scale based on powers of 10.

Each interval of 10 dB indicates a sound energy 10 times greater than before. For example, 10 dB is 10 times more intense than 0 dB, 20 dB is 100 times more intense than 0 dB, and 30 dB is 1,000 times more intense than 0 dB. Thirty (30 dB) dB represents 1,000 times as much acoustic energy as 0 dB. The decibel scale increases as the square of the change, representing the sound pressure energy. A sound as soft as human breathing is about 10 times greater than 0 dB. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. A 10 dB increase in sound level is perceived by the human ear as a doubling of the loudness of the sound. Ambient sounds generally range from 30 dB (very quiet) to 100 dB (very loud).

Sound levels are generated from a source, and their decibel level decreases as the distance from that source increases. Sound dissipates exponentially with distance from the noise source. For a single point source, sound levels decrease approximately 6 dB for each doubling of distance from the source. This drop-off rate is applicable to noise generated by stationary equipment. If noise is produced by a line source (which approximates the effect of several point sources), such as highway traffic or railroad operations, the sound decreases 3 dB for each doubling of distance in a hard site environment. Line source sound levels decrease 4.5 dB for each doubling of distance in a relatively flat environment with absorptive vegetation.

There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also account for the annoying effects of sound. The L_{eq} is the total sound energy of time-varying noise over a sample period. However, the predominant rating scales for communities in the State of California are the L_{eq} and CNEL or the L_{dn} based on A-weighted decibels. CNEL is the time-weighted average noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly L_{eq} for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and a 10 dBA weighting factor applied to noises occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). L_{dn} is similar to the CNEL scale but without the adjustment for events occurring during the relaxation. CNEL and L_{dn} are within 1 dBA of each other and are normally interchangeable.

Other noise rating scales used when assessing the annoyance factor of noise include the maximum noise level (L_{max}), which is the highest exponential time-averaged sound level that occurs during a stated time period. Short-term noise impacts are specified in terms of maximum levels denoted by L_{max}. L_{max} reflects peak operating conditions and addresses the annoying aspects of intermittent noise. For enforcement purposes, it is often used with another noise scale (or noise standards in terms of percentile noise levels) in noise ordinances. For example, the L_{10} noise level represents the noise level exceeded 10 percent of the time during a stated period. The L_{50} noise level represents the median noise level. Half the time the noise level exceeds this level, and half the time it is less than this level. The L_{90} noise level represents the noise level exceeded 90 percent of the time and is considered the background noise level during a monitoring period.

4.6.4.3 Vibration

According to the USDOT FTA Manual, vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or anthropogenic causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency. Vibration is often described in units of velocity (inches per second) and discussed in decibel units in order to compress the range of numbers required to describe vibration. Vibration impacts are generally associated with activities such as train operations, construction, and heavy truck movements.

The background vibration velocity level in residential areas is generally 50 vibration velocity decibels (VdB). Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The relevant range of vibration for the purposes of this analysis is from approximately 50 VdB, the typical background vibration velocity level, to 100 VdB, the general threshold where minor damage can occur in fragile buildings.

4.6.5 Thresholds of Significance

A project would normally have a significant effect on the environment related to noise if it would substantially increase the ambient noise levels for adjoining areas or conflict with the adopted environmental plans and the goals of the community in which the project is located. The following noise level increases were used to determine whether the project would result in a significant noise impact:

For off-site transportation-related impacts:

- Where the existing ambient noise level is less than 65 dBA and a project-related permanent increase in ambient noise levels of 3 dBA CNEL or greater occurs.
- Where the existing ambient noise level is greater than 65 dBA and a project-related permanent increase in ambient noise levels of 1 dBA CNEL or greater occurs.

For non-transportation-related stationary source impacts, including operations:

- If current noise levels experienced at the surrounding noise-sensitive uses are less than the hourly daytime noise level standards, then an exceedance of the standards listed in **Table 4.6.2** would constitute a potentially significant impact.
- If current noise levels experienced at the surrounding noise-sensitive uses are greater than the hourly daytime noise level standard listed in **Table 4.6.2**, then a perceptible increase of 3 dBA or more would constitute a potentially significant impact.

For construction-related impacts:

- Compliance with the City's Municipal Code and exceedance of the FTA standards listed above and in **Table 4.6.4**.

The thresholds for noise impacts used in this analysis are consistent with Appendix G of the State CEQA Guidelines and the City's Initial Study/Environmental Checklist. The proposed project may be deemed to have a significant impact with respect to noise if it would:

Threshold NOI-1: Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Threshold NOI-2: Generation of excessive groundborne vibration or groundborne noise levels?

Threshold NOI-3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Section 4.13, Noise, of the Initial Study (**Appendix B**) prepared for the proposed project concluded the proposed project would have less than significant impacts to ambient noise levels in the vicinity of the project site (Threshold NOI-1) and noise levels related to the proximity of private airstrips and airports (Threshold NOI-3). The proposed project would result in less than significant impact with mitigation incorporated for impacts related to the generation of excessive ground-borne vibration or ground-borne noise levels (Threshold NOI- 2).

4.6.6 Project Impacts

Threshold NOI-1: **Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Impact NOI-1: Less Than Significant Impact.

Construction Noise Impacts. Short-term noise impacts would be associated with demolition of the existing office building, excavation, grading, and construction of the proposed structure. Construction-related short-term noise levels would be higher than existing ambient noise levels in the vicinity of the project site at the present time but would no longer occur once construction of the proposed project is completed.

Two types of short-term noise impacts could occur during construction of the proposed project. First, construction crew commutes and the transport of construction equipment and materials to the project site would incrementally increase noise levels on access roads leading to the site. Although there would be a relatively high single-event noise exposure potential causing intermittent noise nuisance, the effect on longer-term (hourly or daily) ambient noise levels would be small when compared to existing average daily traffic (ADT) volumes of 800 vehicles on Plaza Drive, 39,950 vehicles on Katella Avenue, and 42,050 vehicles on Valley View Street (Urban Crossroads 2023).[77] Because construction-related vehicle trips would not approach the daily traffic volumes on these roadways, traffic noise would not increase by 3 dBA. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. It should be noted that the closest noise-sensitive use along Plaza Drive is an existing hotel located 130 feet from the roadway.

Therefore, short-term, construction-related impacts associated with worker commute and equipment transport to the project site would be less than significant.

In addition to the reference maximum noise level, the usage factor provided in **Table 4.6.6** is utilized to calculate the hourly noise level impact for each piece of equipment based on the following equation:

$$L_{eq}(equip) = E.L. + 10\log(U.F.) - 20\log\left(\frac{D}{50}\right)$$

where: $L_{eq}(equip)$ = L_{eq} at a receiver resulting from the operation of a single piece of equipment over a specified time period

E.L. = noise emission level of the particular piece of equipment at a reference distance of 50 feet

U.F. = usage factor that accounts for the fraction of time that the equipment is in use over the specified period of time

D = distance from the receiver to the piece of equipment

[77] Urban Crossroads. 2023. *Goodman Commerce Center Traffic Analysis*. December 15, 2023.

Table 4.6.6: Typical Maximum Construction Equipment Noise Levels (L_{max})

Type of Equipment	Acoustical Usage Factor	Suggested Maximum Sound Levels for Analysis (dBA L_{max} at 50 ft)
Air Compressor	40	80
Backhoe	40	80
Cement Mixer	50	80
Concrete/Industrial Saw	20	90
Crane	16	85
Excavator	40	85
Forklift	40	85
Generator	50	82
Grader	40	85
Loader	40	80
Pile Driver	20	101
Paver	50	85
Roller	20	85
Rubber Tire Dozer	40	85
Scraper	40	85
Tractor	40	84
Truck	40	84
Welder	40	73

Source: Federal Highway Administration. *Highway Construction Noise Handbook* (FHWA 2006).
dBA = A-weighted decibel(s)
ft = foot/feet
L_{max} = maximum instantaneous noise level

Each piece of construction equipment operates as an individual point source. Utilizing the following equation, a composite noise level can be calculated when multiple sources of noise operate simultaneously:

$$Leq\ (composite) = 10 * \log_{10}\left(\sum_{1}^{n} 10^{\frac{Ln}{10}}\right)$$

Once composite noise levels are calculated, reference noise levels can then be adjusted for distance using the following equation:

$$Leq\ (at\ distance\ X) = Leq\ (at\ 50\ feet) - 20 * \log_{10}\left(\frac{X}{50}\right) Leq\ (at\ distance\ X)$$
$$= Leq\ (at\ 50\ feet) - 20 * \log_{10}\left(\frac{X}{50}\right)$$

In general, this equation shows that doubling the distance would decrease noise levels by 6 dBA, while halving the distance would increase noise levels by 6 dBA.

Using the equations from the methodology above, the reference information in **Table 4.6.6**, and the construction equipment list provided, the composite noise level of each construction phase was calculated. The project construction composite noise levels at a distance of 50 feet would range

from 74 dBA L_{eq} to 88 dBA L_{eq}, with the highest noise levels occurring during the site preparation and grading phases.

Based on the information in **Table 4.6.6**, the noise level generated by the construction phases were calculated. The combination of the equipment during the site preparation and grading phases, considering the usage factor of each piece of equipment, would result in a combined noise level of 59 dBA L_{eq} at a distance of 1,300 feet, which represents the distance from the center of construction activity at the project site to the nearest noise-sensitive use (Courtyard by Marriott) to the southeast. This noise level is less than the average daytime noise level measured to be approximately 61 dBA L_{eq} as described in **Table 4.6.5.** The combined construction and ambient noise level would create an increase of less than 3 dBA, the threshold at which the increase becomes perceptible in an outdoor environment. These predicted noise levels would only occur when all construction equipment is operating simultaneously; therefore, the noise levels are assumed to be rather conservative in nature. While construction-related short-term noise levels have the potential to be higher than existing ambient noise levels in the vicinity of the project site under existing conditions, the noise impacts would no longer occur once project construction is completed. During deep dynamic compaction activities, the major source of noise would be the crane utilized to drop the weight. Construction noise levels would be similar to those during building construction as that construction phase would also include the operation of a crane.

Compliance with the allowed construction hours in the City's Noise Ordinance would ensure that construction noise does not disturb residents during typical sleeping hours or during hours when ambient noise levels are likely to be lower (i.e., at night). In addition, the proposed project would implement several best practices for reducing construction noise, including, but not limited to, maximizing the distance between noise sources and sensitive receptors during construction activities, equipping construction equipment with properly operating and maintained noise mufflers, and establishing a noise disturbance coordinator for the proposed project. These best practices are included in **Regulatory Compliance Measure NOI-1**, provided below. Although construction noise would be higher than the ambient noise in the vicinity of the project site, it would cease to occur once project construction is completed. Additionally, with the incorporation of **Regulatory Compliance Measure NOI-1**, all feasible and reasonable measures to reduce construction noise would be implemented, and a less than significant impact would occur.

Long-Term Off-Site Traffic Noise Impacts. The Federal Highway Administration (FHWA) Highway Traffic Noise Prediction Model (FHWA RD-77-108) was used to evaluate traffic-related noise conditions in the vicinity of the project site. This model requires various parameters, including traffic volumes, vehicle mix, vehicle speed, and roadway geometry to compute typical equivalent noise levels during daytime, evening, and nighttime hours. The resultant noise levels are weighted and summed over 24-hour periods to determine the Community Noise Equivalent Level (CNEL) values. The existing and existing plus project traffic volumes in the vicinity of the project site were obtained from the Traffic Analysis prepared for the proposed project (Urban Crossroads 2023). **Table 4.6.7** lists the existing and existing plus project traffic noise levels adjacent to roadway segments in the project site vicinity. These noise levels represent worst-case scenarios, which assume that no shielding is provided between the traffic and the location where the noise contours are drawn.

Table 4.6.7: Traffic Noise Levels Without and With Proposed Project

Roadway Segment	Existing Without Project		Existing With Project			Opening Year Without Project		Opening Year With Project		
	ADT	CNEL (dBA) 50 feet from Centerline of Nearest Lane	ADT	CNEL (dBA) 50 feet from Centerline of Nearest Lane	Increase from Existing Conditions	ADT	CNEL (dBA) 50 feet from Centerline of Nearest Lane	ADT	CNEL (dBA) 50 feet from Centerline of Nearest Lane	Increase from Near-Term Conditions
Katella Avenue west of Douglas Drive	42,950	70.2	43,200	70.2	0.0	47,150	70.6	47,350	70.6	0.0
Katella Avenue east of Douglas Drive	39,950	69.9	40,050	69.9	0.0	43,750	70.3	43,850	70.3	0.0
Plaza Drive between Douglas Drive and McDonnell Drive	1,350	50.1	1,500	50.6	0.5	1,650	51.0	1,800	51.4	0.4
Plaza Drive between McDonnell Drive and Valley View Street	800	47.9	900	48.4	0.5	1,300	50.0	1,400	50.3	0.3
Douglas Drive Between Katella Avenue and Plaza Drive	1,000	48.8	1,450	50.5	1.7	1,350	50.1	1,600	50.9	0.8
McDonnell Drive Between Katella Avenue and Plaza Drive	350	44.2	350	44.2	0.0	350	44.2	350	44.2	0.0
Valley View Street north of Plaza Drive	42,050	70.1	42,200	70.1	0.0	44,800	70.4	44,950	70.4	0.0

Source: Compiled by LSA (December 2022).
Note: Traffic noise within 50 feet of the roadway centerline should be evaluated with site-specific information.
Shaded cells indicate roadway segments adjacent to the project site.
ADT = average daily traffic
CNEL= Community Noise Equivalent Level
dBA = A-weighted decibels

The results indicate that the increase in noise associated with project-related traffic would be very small, ranging from 0.0 to 1.7 dBA along the analyzed road segments. With those increases, as compared to existing ambient conditions, no significant noise impacts would result based on the applicable thresholds ([1]a 3.0 increase in dBA when the ambient is 65 dBA or less, or [2] a 1.0 increase in dBA when the ambient is 65 dBA or greater). No mitigation is required.

Long-Term Off-Site Stationary Noise Impacts. Implementation of the proposed project would generate various on-site stationary noise sources, including heating, ventilation, and air conditioning (HVAC) and dock operations. The Cypress Municipal Code limits non-construction noise experienced at surrounding noise-sensitive uses to 60 dBA or less per the hourly daytime noise level standards for Noise Zone 2. The closest sensitive use for the noise analysis is the Courtyard by Marriott Hotel located approximately 970 feet southeast of the project site.

Of the on-site stationary noise sources during operation of the project, noise generated by loading dock activities would generate the highest maximum noise levels. To provide a conservative analysis, it is assumed that operations would occur equally during all hours of the day and half of the project's 25 loading docks would be active at all times.

The project would have various rooftop mechanical equipment, including HVAC units, on the proposed building. To be conservative, it is assumed the project could have four (4) rooftop HVAC units that would operate 24 hours per day and would generate sound power levels (SPL) of up to 76 dBA SPL or 63 dBA L_{eq} at 5 feet, based on manufacturer data (Allied Commercial 2019).[78] Noise levels generated by cold storage fan units would be similar to noise readings from previously gathered reference noise level measurements, which generate a noise level of 57.5 dBA L_{eq} at 60 feet based on measurements taken by LSA.[79]

Noise levels generated by delivery trucks would be similar to noise readings from truck loading and unloading activities, which generate a noise level of 75 dBA L_{eq} at 20 feet based on measurements taken by LSA. Delivery trucks would arrive on site and maneuver their trailers so that trailers would be parked within the loading docks. During this process, noise levels are associated with the truck engine noise, air brakes, and back-up alarms while the truck is backing into the dock. These noise levels would occur for a shorter period of time (less than 5 minutes). After a truck enters the loading dock, the doors would be closed, and the remainder of the truck loading activities would be enclosed and therefore much less perceptible. To present a conservative assessment, it is assumed that unloading activities could occur at half of the 25 docks simultaneously for a period of more than 30 minutes in a given hour. Additionally, at the remaining half of the loading docks, it is conservatively assumed that refrigeration units attached to the trailers would be in operation while waiting to be unloaded. Based on reference measurements gathered by LSA, each unit would have a reference noise level of 79.4 dBA at 15 feet.

To determine the future noise impacts from project operations to the noise-sensitive uses, a 3-D noise model, SoundPLAN, was used to incorporate the site topography as well as the shielding from

[78] Allied Commercial. 2019. KHB – K-Series Rooftop Units Standard and High Efficiency – 50 Hz Product Specifications. April.

[79] LSA. 2016. *Operational Noise Impact Analysis for Richmond Wholesale Meat Distribution Center.*

the proposed building on site. A graphic representation of the potential operational noise impacts is presented in **Appendix G** of this Draft EIR. The results show the 60 dBA L_{eq} daytime noise contour from operations and the 55 dBA L_{eq} nighttime noise contour from operations would not approach the closest noise-sensitive uses. The estimated noise level at the closest noise-sensitive uses would be less than 34 dBA L_{eq}. Additionally, the proposed project would not substantially increase noise levels over existing conditions. Therefore, this impact would be less than significant. No mitigation is required.

Threshold NOI-2: Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels?

Impact NOI-2: Less Than Significant with Mitigation Incorporated. Vibration refers to ground-borne noise and perceptible motion. Ground-borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors. Vibration energy propagates from a source, through intervening soil and rock layers, to the foundations of nearby buildings. The vibration then propagates from the foundation throughout the remainder of the structure.

Typical sources of ground-borne vibration are construction activities (e.g., pavement breaking and operating heavy-duty earthmoving equipment), rail activity, and occasional traffic on rough roads. In general, ground-borne vibration from standard construction practices is only a potential issue when within 25 feet of vibration-sensitive uses. Ground-borne vibration levels from construction activities very rarely reach levels that can damage structures; however, these levels are perceptible near the active construction site. With the exception of older buildings built prior to the 1950s or buildings of historic significance, potential structural damage from heavy construction activities rarely occurs. When roadways are smooth, vibration from traffic (even heavy trucks) is rarely perceptible.

The roadways surrounding the project site, including Plaza Drive, McDonnell Drive, and the existing driveways, are paved, smooth, and unlikely to cause significant ground-borne vibration. In addition, the rubber tires and suspension systems of buses and other on-road vehicles make it unusual for on-road vehicles to cause ground-borne noise or vibration problems. It is, therefore, assumed that no such vehicular vibration impacts would occur and, therefore, no vibration impact analysis of on-road vehicles is necessary.

Construction Vibration Impacts. Construction of the proposed project could result in the generation of ground-borne vibration. This construction vibration impact analysis discusses the potential for building damages using vibration levels in PPV (in/sec) because vibration level in PPV is best used to characterize potential for damage. The 2018 FTA Manual guidelines indicate that a vibration level up to 0.5 in/sec in PPV is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. For a non-engineered timber and masonry building, the construction vibration damage criterion is 0.2 in/sec in PPV. Based on information provided by the Project Applicant, the surrounding structures are made of tilt-up concrete; therefore, the vibration analysis will utilize a criterion of 0.5 in/sec PPV.

Table 4.6.8 shows the PPV values at 25 feet from a construction vibration source. As shown in this table, bulldozers and other heavy-tracked construction equipment (except for pile drivers and vibratory rollers) generate approximately 0.089 in/sec PPV of ground-borne vibration when

measured at 25 feet, based on the 2018 FTA Manual. In addition to standard vibration reference information, **Table 4.6.8** also includes reference vibration data previously gathered during deep dynamic compaction (DDC) operations.

Table 4.6.8: Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV (in/sec) at 25 ft
Deep Dynamic Compaction (10 ton, 60 ft Drop)	0.970[1]
Pile Driver (Impact), Typical	0.644
Pile Driver (Sonic), Typical	0.170
Vibratory Roller	0.210
Hoe Ram	0.089
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Trucks	0.076
Jackhammer	0.035
Small Bulldozer	0.003

Sources: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018), Measured DDC data from G3SoilWorks Inc.
[1] PPV vibration data for deep dynamic compaction activities is at a reference distance of 50 ft.
DDC = deep dynamic compaction
ft = foot/feet
FTA = Federal Transit Administration
in/sec = inches per second
PPV = peak particle velocity

In addition to DDC operations used during foundation preparation, construction activities for the proposed project are expected to include the use of bulldozers and loaded trucks. The greatest levels of vibration are anticipated to occur during the foundation preparation phase. All other phases are expected to result in lower vibration levels.

The distance to the nearest buildings for the vibration impact analysis is measured between the nearest off-site buildings and the project site boundary (assuming the construction equipment would be used at or near the project site boundary) because vibration impacts occur normally within buildings. The formula for vibration transmission is provided below.

$$PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$$

The distance to the nearest buildings for the vibration impact analysis during DDC is measured between the nearest off-site buildings and the edge of the proposed building at 50 feet, indicating where DDC is needed. The formula for vibration transmission was calculated based on data provided by G3SoilWorks Inc. and is provided in **Appendix F** of this Draft EIR.

For typical construction activity, the equipment with the highest vibration generation potential is the large bulldozer, which would generate 0.089 PPV in/sec at 25 feet. The closest surrounding buildings to the project site include existing industrial buildings located approximately 5 feet north of the edge of the project site. The industrial building would experience vibration levels of up to 0.995 in/sec PPV. This vibration level at the nearest building from construction equipment would potentially exceed the FTA threshold of 0.5 in/sec PPV for building damage. At a distance of approximately 8 feet from typical construction activities, vibration levels would approach 0.492

in/sec PPV and would be below the FTA criteria of 0.5 in/sec PPV. While construction could result in vibration damage, impacts would be reduced to less than significant, and the potential for building damage would be eliminated with the incorporation of **Mitigation Measure NOI-1** as detailed below.

For the DDC construction activities, the proposed drops could occur as close as 50 feet from the nearest structures. The nearest off-site industrial building to the DDC construction activities would experience vibration levels of up to 1.02 in/sec PPV, which would potentially exceed the FTA threshold of 0.5 in/sec PPV for building damage. At a distance of approximately 78 feet from DDC construction activities, vibration levels would be 0.49 in/sec PPV and would be below the FTA criteria of 0.5 in/sec PPV. While construction could result in vibration damage, impacts would be reduced to less than significant, and the potential for building damage would be eliminated with the incorporation of **Mitigation Measure NOI-1.**

Threshold NOI-3: **For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

Impact NOI-3: Less than Significant Impact. The closest airport to the project site is Joint Forces Training Base (JFTB) Los Alamitos, which is located approximately 0.4 mile to the southwest. The noise contour boundaries of JFTB show that the project site is located outside of Noise Impact Zone 2 (60 dB CNEL or greater), therefore, this impact would be less than significant. No mitigation is required.

4.6.7 Level of Significance Prior to Mitigation

Prior to the implementation of mitigation measures, the project could potentially result in the generation of ground-borne vibration and ground-borne noise during construction activities. The project would result in less than significant impacts related to temporary construction and operational noise impacts, and to the exposure of people to excessive noise levels within the vicinity of an airport or private airstrip.

4.6.8 Regulatory Compliance Measures and Mitigation Measures

4.6.8.1 Regulatory Compliance Measures

The following regulatory compliance measure is applicable to the proposed project and is considered in the analysis of potential impacts related to noise. In addition to compliance with the construction hours specified in the City's Municipal Code, the following standard condition would reduce construction noise to the extent feasible and reasonable:

Regulatory Compliance Measure NOI-1 **Construction Noise and Vibration**. Prior to issuance of grading permits, the City of Cypress (City) Director of Community Development Department, or designee, shall verify that grading and construction plans include the following requirements:

- Ensure that the greatest distance between noise sources and sensitive receptors during construction activities has been achieved.
- Construction equipment, fixed or mobile, shall be equipped with properly operating and maintained noise mufflers consistent with manufacturers' standards.
- Construction staging areas shall be located away from off-site sensitive uses during the later phases of project development.
- The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from noise-sensitive receptors nearest the project site whenever feasible.
- The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators where feasible.
- A sign, legible at a distance of 50 feet, shall also be posted at the construction site perimeter. All notices and the signs shall indicate the dates and duration of ground improvement activities, as well as provide a telephone number for the "noise disturbance coordinator."
- A "noise disturbance coordinator" shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures to reduce noise levels. All signs posted at the construction site shall list the telephone number for the disturbance coordinator.

4.6.8.2 Mitigation Measures

The following mitigation measure is applicable to the proposed project.

Mitigation Measure NOI-1 **Construction Vibration Monitoring Plan.** Due to the close proximity to surrounding structures, the City of Cypress (City) Director of Community Development, or designee,

shall verify prior to issuance of demolition or grading permits, that the approved plans require that the construction contractor implement the following mitigation measures during project construction activities in the event that the use of heavy equipment is necessary within 25 feet (ft) of surrounding structures or when deep dynamic compaction (DDC) construction activity takes places within 80 ft of surrounding structures:

- Notification to nearby businesses detailing the schedule and duration of DDC activities.

- Structures that are located within 25 ft of heavy construction activities and within 80 ft of DDC construction activity that have the potential to be affected by ground-borne vibration shall be identified. This task shall be conducted by a qualified structural engineer as approved by the City's Director of Community Development, or designee.

- The Applicant's construction contractor shall develop a vibration monitoring and construction contingency plan for approval by the City's Director of Community Development, or designee, to identify appropriate locations in the vicinity of nearby structures where monitoring would be conducted; set up a vibration monitoring schedule; define structure-specific maximum vibration limits based on building inspections; contain provisions to conduct photo, elevation, and crack surveys to document before and after construction conditions at those structures. The plan shall identify construction contingencies that would be implemented if vibration levels approach the established vibration limits at a particular location. Potential contingencies may include one or more of the following:

    - Lowering the height of the compaction weight;

    - Using a lighter compaction weight; or

    - Any other alternate method that is safe and appropriate, as determined by the project geotechnical consultant, in consultation with the

City's Director of Community Development (such as utilizing geopier stabilization instead of DDC).[80]

- At a minimum, vibration during initial site preparation activities at the locations described above shall be monitored. The monitoring results may indicate the need for more or less intensive measurements.

- When vibration levels approach the applicable limits established in the vibration monitoring and construction contingency plan, construction shall be suspended, and the appropriate mitigation measures identified in the construction contingency plan shall be implemented to reduce vibration levels below thresholds.

4.6.9 Level of Significance after Mitigation

With the implementation of mitigation measures, all impacts would be reduced to a less than significant level.

4.6.10 Cumulative Impacts

Less Than Significant Impact. As defined in the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and reasonably foreseeable probable future projects. A cumulative noise or vibration impact would occur if multiple sources of noise and vibration combine to create impacts in close proximity to a sensitive receptor. Therefore, the cumulative area for noise and vibration impacts is the project site and any sensitive receptors in the immediately surrounding area.

Construction Noise. Construction activities associated with the proposed project and other construction projects in the area may overlap, resulting in construction noise in the area. However, construction noise impacts primarily affect the areas immediately adjacent to each construction site. Construction noise for the proposed project was determined to be less than significant. Cumulative development in the vicinity of the project site could result in elevated construction noise levels at sensitive receptors in the area surrounding the project site. However, each project would be required to comply with the applicable city's Municipal Code limitations on construction. Therefore, cumulative construction noise impacts would be less than significant.

Operational Traffic Source Noise Impacts. According to the USEPA, cumulative noise impacts represent the combined and incremental effects of human activities that accumulate over time. While the incremental impacts may be insignificant by themselves, the combined effect may result in a significant impact. Conversely, although there may be a significant noise increase due to the

[80] Utilizing a geopier stabilization system method is estimated to result in vibration levels of 0.22 at approximately 15 feet, which would ensure that vibration from construction within 10 feet remains lower than the threshold of 0.5 in/sec PPV for building damage.

proposed project in combination with other related projects (combined effects), it must also be demonstrated that the project has an incremental effect. In other words, a significant portion of the noise increase must be due to the proposed project.

As stated in Section 4.7, Transportation, the results of the Future Year (2025) Condition (Opening Year With Project) peak-hour level of service (LOS) analysis for the study area intersections show that all study area intersections are forecasted to operate at satisfactory LOS during both peak hours. As previously shown in **Table 4.6.8** above, project-related traffic for the Opening Year With Project would result in noise level increases between 0.0 to 0.8 dBA CNEL along roadway segments in the vicinity of the project site. These levels are below the significance criteria for off-site traffic noise. Therefore, none of the roadway segments in the vicinity of the project site would experience a substantial noise level increase greater than the applicable noise thresholds, and the proposed project would not have a cumulatively significant traffic noise impact.

Operational Stationary Source Noise. Long-term stationary noise sources associated with the development at the proposed project, combined with other cumulative projects, could cause local noise level increases. Noise levels associated with the proposed project and related projects together could result in higher noise levels than considered separately. As previously described, on-site noise sources associated with the proposed project would not exceed any applicable noise standards. Additionally, each of the related projects would be required to comply with the City's noise level standards and include mitigation measures if standards are exceeded. Therefore, cumulative noise impacts from stationary noise sources would be less than significant.

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4.7 TRANSPORTATION

This section analyzes the potential transportation impacts associated with the 5655 Plaza Drive Project (proposed project). The analysis contained in this section is based on the *Traffic Impact Analysis* prepared by Urban Crossroads, dated November 21, 2023, the Traffic Memorandum dated February 20, 2024, and the *Vehicle Miles Traveled (VMT) Analysis*, prepared by LSA Associates, Inc., dated December 15, 2023. Both documents are provided in **Appendix E** to this Draft EIR.

4.7.1 Scoping Process

The City received three comment letters during the public review period for the NOP. For copies of the NOP comment letters, refer to **Appendix A** of this Draft EIR. Two comment letters included comments related to noise.

The letter from the City of Los Alamitos received on June 5, 2024, requests that the Draft EIR outline the existing truck routes, the project's impact along existing truck routes, and any impacts related to the modification of truck routes. Additionally, the letter suggested the Draft EIR provide a traffic and/or access analysis to evaluate daily truck trips and their distribution and influence on Los Alamitos roadways. Specifically, on I-605 and I-405.

The Letter from Warland Investments Company and Affiliated Entities received on June 5, 2024, suggest that the proposed project has a foreseeable potential use as a logistics center, stating that logistics centers can create more congestion on local streets when compared to typical warehouse projects. Additionally, in a previous letter dated March 7, 2024, which was included as an attachment in the June 5, 2024, letter, Warland states their concerns about the Truck Distribution Map in the Traffic Analysis for the proposed project, highlighting the analysis's failure to account for truck traffic from the entire Goodman Commerce Center (the 5665 Plaza Drive Project and The Goodmand Commerce Center Project), the incorrect assumption that 100 percent of truck traffic will exit via Driveway 1, and the omission of detailed projections for truck routes, especially regarding the impact on nearby residential areas. Additionally, the letter argues that the Traffic Analysis inaccurately estimates daily truck trips by solely evaluating the 5665 Redevelopment, rather than considering the entire Goodman Commerce Center as a logistics hub, leading to a significant underestimation of truck traffic impacts.

4.7.2 Regulatory Setting

The applicable federal, State, regional, and local regulatory framework is discussed below.

4.7.2.1 Federal Regulations

There are no federal regulations or policies pertaining to transportation that are applicable to the proposed project.

4.7.2.2 State Regulations

Senate Bill 743. SB 73 was signed into law by Governor Jerry Brown on September 27, 2013, initiating a change to the State CEQA Guidelines on the methodology for analyzing transportation impacts in CEQA documents. SB 743 directed the California OPR to establish new CEQA guidance to replace analytical approaches focused on automobile vehicle delay at intersections and traffic

congestion along roadway segments using the level of service (LOS) method from CEQA transportation analysis. As of July 1, 2020, lead agencies must use the vehicle miles traveled (VMT) metric instead of LOS to analyze transportation impacts in CEQA documents as the basis for determining significant transportation impacts in the State. VMT measures the vehicle miles travelled that would result from implementation of a project.

State CEQA Guidelines Section 15064.3, Subdivision (b). In January 2018, the State of California OPR submitted a proposal to the California Natural Resources Agency for comprehensive updates to the State CEQA Guidelines. The submittal included proposed updates related to the analysis of greenhouse gas (GHG) emissions, energy, transportation impacts pursuant to SB 743, and wildfires, as well as revisions to State CEQA Guidelines Section 15126.2(a) in response to the California Supreme Court's decision in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal. 4th 369. On December 28, 2018, the updated State CEQA Guidelines went into effect.

Section 15064.3 of the updated State CEQA Guidelines codifies that project-related transportation impacts are typically best measured by evaluating the project's VMT. Specifically, subdivision (b) focuses on specific criteria related to transportation analysis and is divided into four subdivisions: (1) land use projects, (2) transportation projects, (3), qualitative analysis, and (4) methodology. Subdivision (b)(1) provides guidance on determining the significance of transportation impacts of land use projects using VMT; projects located within 0.5 mile of high-quality transit should be considered to have a less than significant impact. Subdivision (b)(2) addresses VMT associated with transportation projects and states that projects that reduce VMT, such as pedestrian, bicycle, and transit projects, should be presumed to have a less than significant impact. Subdivision (b)(3) acknowledges that Lead Agencies may not be able to quantitatively estimate VMT for every project type; in these cases, a qualitative analysis may be used. Subdivision (b)(4) stipulates that Lead Agencies have the discretion to formulate a methodology that would appropriately analyze a project's VMT.

4.7.2.3 Regional Regulations

Orange County Congestion Management Program. Established in 1991, the Orange County Transportation Authority (OCTA) consolidated seven separate agencies into a single multimodal transportation agency. State law requires that a Congestion Management Program (CMP) be developed, adopted, and updated biennially for every county that includes an urbanized area, and requires that it include every city and the county government within that county. As the Congestion Management Agency for Orange County, OCTA is responsible for implementing the Orange County CMP. OCTA adopted the CMP in 1991 to reduce traffic congestion and to provide a mechanism for coordinating land use and development decisions in Orange County. Compliance with the CMP requirements ensures a city's eligibility to compete for State gas tax funds for local transportation projects.

County of Orange Master Plan of Arterial Highways. The County of Orange Master Plan of Arterial Highways (MPAH) defines the arterial system in the Circulation Element of the Orange County General Plan. This system, which is the planned future roadway system in the County, incorporates several specific arterial roadway classifications. The Circulation Elements of cities within the County

are expected to be consistent with the MPAH in order to be eligible for funding improvements on MPAH roadways.

County of Orange Measure M Growth Management Program. Measure M, approved in 1990 by County voters, authorized the collection of a one-half percent sales tax to fund needed transportation improvements. In order to be eligible to receive funds, cities must satisfy a number of requirements, including adopting a Circulation Element that is consistent with the County's MPAH, adopting a Growth Management Plan, and adopting a seven-year capital improvement program to include transportation projects funded by Measure M.

4.7.2.4 Local Regulations

City of Cypress General Plan. The City of Cypress General Plan[81] is the primary source of long-range planning and policy direction that guides growth and preserves quality of life within the community. The General Plan contains goals, policies, and plans that are intended to guide land use and development decisions. The General Plan, last comprehensively updated in 2001, includes a Land Use Map and the following eight elements, or chapters, which together fulfill the State requirements for a General Plan:

- Land Use Element
- Housing Element
- Circulation Element
- Conservation/Open Space/Recreation Element (satisfies the State's Conservation and Open Space Element requirements)
- Safety Element
- Noise Element
- Air Quality Element (optional element not required by State law)
- Growth Management Element (optional element not required by State law)

City of Cypress General Plan Circulation Element. The Circulation Element[82] is a general guide for the planning, development, and enhancement of the City's public roadways, based on existing and anticipated land uses. Most transportation-related plans and programs are established with the goal of maintaining acceptable operating LOS on the City's transportation system. The City of Cypress has adopted LOS D or better as the desired citywide operating standard for most City streets. However, given the influence of regional traffic on Valley View Street, Lincoln Avenue, and Katella Avenue, which are beyond the control of the City of Cypress, LOS E or better has been adopted as the minimum operating Level of Service for street segments and intersections on these arterials. The Circulation Element goals and policies define the City's vision for a balanced, efficient circulation system which incorporate many modes of travel and which allows for the safe movement of people

81 City of Cypress. 2001a. *City of Cypress General Plan*.
82 City of Cypress. 2001b. *City of Cypress General Plan* Circulation Element.

and goods in and around Cypress. Based on the Circulation Element, the local and regional street network is built out in Cypress. Similarly, the City's bikeway system is generally built out, with the exception of a planned bike lane on Walker Street south of Cerritos Avenue. This proposed bike lane would connect to the existing bike lane on Walker Street north of Cerritos Avenue.

4.7.3 Existing Environmental Setting

4.7.3.1 Existing Circulation System

The project site is generally bounded by light industrial uses to the north and the Goodman Commerce Center Project (approved in April 2023) to the east, and Plaza Drive to the south. Access to the project site is provided by two existing driveways along Plaza Drive; the proposed project would relocate the driveway locations. The new westernmost driveway would be the primary truck access point and path to the truck loading docks on the proposed building's west side, while the eastern driveway would be a shared driveway with the parcel to the east.

Key roadways in the vicinity of the project site include:

- **Plaza Drive** is an east-west two- lane divided roadway located directly south of the project site and is not a classified General Plan roadway. Sidewalks are not provided along Plaza Drive**.** No on-street parking is permitted.

- **Douglas Drive** is a north-south two-lane divided roadway located south of the project site and connects into Katella Avenue via a signalized intersection and is not a classified General Plan roadway. Sidewalks are provided on the west side along the roadway. However, sidewalks are proposed along 5775 and 5885 on the north side of Douglas Drive No on-street parking is permitted.

- **Katella Avenue** is an east-west six-lane divided roadway located south of the project site. According to the City of Cypress General Plan Circulation Element (2001), Katella Avenue is designated as a Major Arterial. Katella Avenue is designated on the Orange County CMP as a CMP facility. The posted speed limit is 40 to 45 miles per hour (mph). Sidewalks are provided on both sides of the street. On-street parking is permitted in select locations.

- **Valley View Street** is a north-south six-lane divided roadway located west of the project site. Valley View Street designated as a Major Arterial in the City of Cypress General Plan Circulation Element. Valley View Street is designated in the Orange County CMP as a CMP facility. The posted speed limit is 45 mph. Sidewalks are provided on both sides of the street. On-street parking is not permitted.

- **Walker Street** is a north-south, four-to-five-lane, undivided roadway. According to the City of Cypress General Plan Circulation Element (2001), Walker Street is classified as a Secondary Arterial. The average posted speed limit is 40 mph. Sidewalks are provided on both sides of the street. On-street parking is not permitted.

- **Cerritos Avenue** is a four-to-five-lane, divided roadway. According to the City of Cypress General Plan (2001), Cerritos Avenue is a Primary Arterial. The posted speed limit is 45 mph. Sidewalks

are provided on both sides of the street, and on-street (Class II) bicycle lanes are provided on both sides between Walker Street and Denni Street. On-street parking is permitted in select locations.

- **Ball Road** is a four-lane, divided roadway and it is classified as a Primary Arterial according to the City of Cypress General Plan (2001). The posted speed limit is 45 mph. On-street (Class II) bicycle lanes and sidewalks are provided on both sides of the street. On-street parking is not permitted.

- **Moody Street** is a north-south, four-lane, divided roadway. According to the City's General Plan Circulation Element (2001), Moody Street is classified as a Primary Arterial. The posted speed limit is 40 mph. On-street bicycle lanes (Class II) and sidewalks are provided on both sides of the street. On-street parking is generally not permitted.

- **Orangewood Avenue** is a four-lane, undivided roadway. According to the City of Cypress General Plan (2001), Orangewood Avenue is a Secondary Arterial. The posted speed limit is 35 to 40 mph. Sidewalks are provided on both sides of the street. On-street parking is not permitted.

Pedestrian Circulation. Sidewalks currently exist on both sides of Katella Avenue, Valley View Street, in the vicinity of the project site. Additionally, there is a 10-foot sidewalk along the west side of Douglas Drive between the proposed project down to Katella Avenue to the south. There are pedestrian crosswalks at all signalized intersections in the vicinity of the project site. These facilities provide for pedestrian circulation between the project site and the surrounding areas.

Bicycle Circulation. Katella Avenue and Valley View Street currently accommodate off-street bike paths; there are no on-street bike lanes provided by Katella Avenue. On-street (Class II) bicycle lanes are provided on both sides of Cerritos Avenue (between Walker Street and Denni Street) and Bloomfield Street. There is a Class I bicycle lane on the south side of Cerritos Avenue between Walker Street and Denni Street. On-street bicycle lanes (Class II) and sidewalks are provided on both sides of Moody Street.

Transit Facilities. Transit facilities would be provided by the OCTA along Katella Avenue and Valley View Street. OCTA Route 50 runs along Katella Avenue and currently has existing bus stops just east of Douglas Drive and west of Valley View Street. Route 50 provides transportation to/from the Cities of Orange and Long Beach via Katella Avenue. OCTA Route 123 runs along Valley View Street with existing bus stops north of Plaza. OCTA Route 123 provides transportation to/from Buena Park and Sunset Beach via Valley View Street. OCTA buses stop approximately every hour (60 minutes) during the morning and evening commute hours (operational between 4:00 AM and 10:00 PM).

4.7.3.2 Existing Traffic Volumes and LOS Analysis

The intersection LOS analysis is based on the traffic volumes observed during the peak hour conditions using traffic count data collected in 2022 when local schools were in session and operating on normal bell schedules. The following peak hours were selected for analysis:

- Weekday AM Peak Hour (peak hour between 7:00 AM and 9:00 AM)
- Weekday PM Peak Hour (peak hour between 4:00 PM and 6:00 PM)

There were no observations made in the field that would indicate atypical traffic conditions on the count dates, such as construction activity or detour routes and near-by schools were in session and operating on normal schedules. The 2022 peak hour volumes have been adjusted to increase turning movements into low occupancy office uses in the surrounding area by 30 percent. The volumes were then increased by an additional two percent for all movements in order to adjust the 2022 traffic counts to 2023. A comparison of the PM peak hour and daily traffic volumes of various roadway segments within the study area indicated that the peak-to-daily relationship is approximately 8.9 percent. As such, the above equation utilizing a factor of 11.3 estimates the ADT volumes on the study area roadway segments assuming a peak-to-daily relationship of approximately 8.9 percent (i.e., 1/0.089 = 11.3) and was assumed to sufficiently estimate ADT volumes for planning-level analyses.

Volumes reported on the exhibits are expressed in passenger car equivalent (PCE) volumes as the intersection operations analysis utilizes PCE volumes. Note that only the intersection turning movement volumes are expressed in PCE and ADTs are presented as actual vehicles as used in other technical studies. PCEs allow the typical "real-world" mix of vehicle types to be represented as a single, standardized unit, such as the passenger car, to be used for the purposes of capacity and level of service analyses.

The intersection operations analysis results summarized on **Table 4.7.1** indicate that all existing study area intersections are currently operating at acceptable LOS during the peak hours.

Table 4.7.1: Existing Intersection Level of Service Summary (2023) Conditions

Intersection		Control	Peak Hour	Existing	
				ICU/Delay	LOS
1	Douglas Drive /Warland Drive and Katella Avenue	Signal (ICU)	AM	0.44	A
			PM	0.52	A
		Signal (Delay)	AM	5.4	A
			PM	8.2	A
2	Douglas Drive /Driveway 2 and Driveway 1/Plaza Drive	AWS (ICU)	AM	N/A	N/A
			PM	N/A	N/A
		AWS (Delay)	AM	7.2	A
			PM	7.7	A
5	Existing Driveway/McDonnell Dive and Plaza Drive	CSS (ICU)	AM	N/A	N/A
			PM	N/A	N/A
		CSS (Delay)	AM	9.2	A
			PM	10.8	B
7	Knott Avenue/Katella Avenue	Signal (ICU)	AM	0.56	A
			PM	0.79	C
8	Western Avenue/Katella Avenue	Signal (Delay)	AM	15.4	B
			PM	35.7	D

Source: *Traffic Impact Analysis* (Urban Crossroads, November 2023).
Note: Delay is reported in seconds.
CSS = cross-street stop
ICU = Intersection Capacity Utilization
LOS = level of service
N/A = not applicable

4.7.3.3 Existing Traffic Signal Warrant Analysis

Traffic signal warrants for existing traffic conditions are based on existing peak hour intersection turning volumes. For existing traffic conditions, there are no study area intersections that currently warrant a traffic signal based on the peak hour traffic volumes.

4.7.3.4 Existing VMT

Regional HBW VMT for Orange County was calculated for the base (2016) and future (2045) scenarios based on OCTAM output files. The socio-economic data and VMT per employee for the region was calculated as a collection of TAZs (all TAZs located in Orange County) rather than a single TAZ. Baseline (2020) HBW VMT for Orange County was developed by interpolating (using linear interpolation) between base (2016) and future (2045) VMT. Orange County baseline (2020) VMT per employee is summarized in **Table 4.7.2.**

Table 4.7.2: Baseline 2020 Orange County VMT per Employee

Description	Orange County[1]
Employment	1,710,147
VMT	4 1,174,971
VMT/Employee	24.81

Source: *VMT Assessment* (LSA December 2023).
[1] Obtained from Final Draft Guidelines For Evaluating Vehicle Miles Traveled Under CEQA for the County of Orange, September 17,2020.
OCTAM = Orange County Transportation Analysis Model
VMT = vehicle miles traveled

4.7.4 Methodology

As discussed in Section 4.7.2, Regulatory Setting, recent changes to the State CEQA Guidelines eliminated the requirement for LOS analysis in CEQA documents in favor of the VMT metric. However, the City of Cypress' General Plan Circulation Element includes a detailed LOS analysis of the City's existing operating conditions and sets LOS capacity/operational standards for each class of roadway within the City. Therefore, an analysis of LOS is included in this section in order to achieve consistency with the City's General Plan.

The Traffic Impact Analysis (TIA) (see **Appendix E**) prepared for the proposed project is consistent with the objectives and requirements of the City of Cypress, and the Orange County CMP (County of

Orange 2023),[83] as well as applicable provisions of CEQA, including disclosure of project impacts in both existing and cumulative horizon years.

The scope of work for the TIA, including the project study area, was reviewed and approved by the City's Traffic Engineer prior to the preparation of the TIA. Study area locations were selected in consultation with City staff. The study area analyzed in the project TIA includes the following four intersections (six intersections in Cypress, one intersection in both Cypress and Stanton, and one intersection in Stanton):

1. Douglas Drive/Warland Drive and Katella Avenue (signalized) (Cypress)
2. Douglas Drive/Driveway 2 and Driveway 1/Plaza Drive (unsignalized (Cypress)
3. Existing Driveway/McDonnell Drive and Plaza Drive (unsignalized) (Cypress)
4. Valley View Street and Plaza Drive/Chip Avenue (signalized) (Cypress)

4.7.4.1 Intersection Level of Service Methodologies

In accordance with the requirements of the City of Cypress, and the Orange County CMP, signalized intersection operation is analyzed using the Intersection Capacity Utilization (ICU) methodology. The ICU methodology compares the volume-to-capacity (v/c) ratios of conflicting turn movements at an intersection, sums up these critical conflicting v/c ratios for each intersection approach, and determines the overall ICU. Lane capacities of 1,600 vehicles per hour of green time is assumed for the ICU calculations. The Traffix software is utilized to evaluate the signalized intersections based on the ICU methodology. The resulting ICU is expressed in terms of level of service (LOS), where LOS A represents free-flow operation and LOS F represents over capacity operation.

The relationship between LOS and the ICU value (i.e., v/c ratio) is as follows.

Level of Service	Volume-to-Capacity (ICU Methodology)
A	≤0.60
B	>0.60 and ≤0.70
C	>0.70 and ≤0.80
D	>0.80 and ≤0.90
E	>0.90 and ≤1.00
F	>1.00

Source: 2019 Orange County Congestion Management Program (CMP)
ICU = intersection capacity utilization

In addition to the ICU methodology of calculating signalized intersection LOS, the *Highway Capacity Manual* (HCM), 6th Edition (Transportation Research Board 2017) methodology is used to determine the LOS of the unsignalized intersections. The Synchro (Version 10) is utilized for evaluation of the unsignalized study area intersections based on the HCM 6th Edition methodology. The following tables, **Table 4.7.3** shows the relationship of delay to LOS for unsignalized and **Table 4.74** shows the signalized intersections.

[83] Orange County Transportation Authority (OCTA). 2023. *Orange County Congestion Management Program Report. November.* Website: https://www.octa.net/pdf/2023CMP.pdf?n=202311 (accessed May 24, 2024).

Table 4.7.3: Unsignalized Intersection LOS Thresholds

Description	Level of Service	Intersection Delay (seconds) per Vehicle (HCM Methodology)
		Unsignalized
Little or no delays	A	0 to 10.00
Short traffic delays	B	10.01 to 15.00
Average traffic delays.	C	15.01 to 25.00
Long traffic delays	D	25.01 to 35.00
Very long traffic delays.	E	35.01 to 50.00
Extreme traffic delays with intersection capacity exceeded.	F	>50.0

Source: *Highway Capacity Manual* 6th Edition (Transportation Research Board 2017).

Table 4.7.4: Signalized Intersection LOS Thresholds

Description	Level of Service	Intersection Delay (seconds) per Vehicle (HCM Methodology)
		Unsignalized
Operations with very low delay occurring with favorable progression and/or short cycle length.	A	0 to 10.00
Operations with low delay occurring with good progression and/or short cycle lengths.	B	10.01 to 20.00
Operations with average delays resulting from fair progression and/or longer cycle lengths. Individual cycle failures begin to appear.	C	20.01 to 35.00
Operations with longer delays due to a combination of unfavorable progression, long cycle lengths, or high V/C ratios. Many vehicles stop and individual cycle failures are noticeable.	D	35.01 to 55.00
Operations with high delay values indicating poor progression, long cycle lengths, and high V/C ratios. Individual cycle failures are frequent occurrences. This is considered to be the limit of acceptable delay.	E	55.01 to 80.00
Operation with delays unacceptable to most drivers occurring due to over saturation, poor progression, or very long cycle lengths.	F	80.01 and up

Source: *Highway Capacity Manual* 6th Edition (Transportation Research Board 2017).

4.7.4.2 Traffic Signal Warrant Analysis Methodology

The term "signal warrants" refers to the list of established criteria used by Caltrans and other public agencies to quantitatively justify or ascertain the potential need for installation of a traffic signal at an otherwise unsignalized intersection. An evaluation of the signal warrant criteria presented in the Caltrans 2014 California Manual on Uniform Traffic Control Devices (CAMUTCD) (revised in 2023) is conducted for the unsignalized study area intersections.

The signal warrant criteria for existing study area intersections are based upon several factors, including volume of vehicular and pedestrian traffic, frequency of accidents, and location of school areas. The CA MUTCD indicates that the installation of a traffic signal should be considered if one or

more of the signal warrants are met. Specifically, this TIA utilizes the Peak Hour Volume-based Warrant 3 as the appropriate representative traffic signal warrant analysis for existing traffic conditions and for all future analysis scenarios for existing unsignalized intersections. Warrant 3 is appropriate to use for this TIA because it provides specialized warrant criteria for intersections with rural characteristics. For the purposes of this study, the speed limit was the basis for determining whether Urban or Rural warrants were used for a given intersection. Rural warrants have been used where posted speed limits on the major roadways with unsignalized intersections that are over 40 miles per hour while urban warrants have been used where posted speeds are 40 miles per hour or below.

It is important to note that a signal warrant defines the minimum condition under which the installation of a traffic signal might be warranted. Meeting this threshold condition does not require that a traffic control signal be installed at a particular location, but rather, that other traffic factors and conditions be evaluated in order to determine whether the signal is truly justified. It should also be noted that signal warrants do not necessarily correlate with LOS. An intersection may satisfy a signal warrant condition and operate at or above acceptable LOS or operate below acceptable LOS and not meet a signal warrant.

4.7.4.3 Vehicle Miles Traveled Analysis

On December 28, 2018, the California Office of Administrative Law cleared the revised CEQA Guidelines for use. Among the changes to the State CEQA Guidelines was the removal of vehicle delay and LOS from consideration under CEQA. With the adopted guidelines, transportation impacts are to be evaluated based on a project's effect on VMT.

The City is yet to adopt the SB 743 guidelines; therefore, the VMT analysis has been based upon the methodology and significant threshold criteria identified in the OPR's Technical Advisory, dated December 2018.

The project includes industrial land uses only. The OPR Technical Advisory does not specifically recommend any VMT metric or threshold for industrial uses. However, since the land use is non-residential and could not be classified as retail land use, VMT-per-employee metric was used for purposes of evaluating the project.

Based on the OPR Technical Advisory recommendations, the threshold for determining VMT impacts has been considered as 15 percent below the region's baseline VMT per capita for residential projects, and 15 percent below the region's baseline VMT per employee for non-residential/non-retail projects.

As per the OPR TA, a region should be defined based on where the majority of the project trips are contained. As such, the majority of project trips are estimated to start or end within the region defined for VMT analysis purposes. Typically, it is the county boundary within which a majority of those trips are contained. While the city boundary can also be considered as the region for residential uses, given that the project land use is non-residential and based on the understanding of the local trip patterns, it was determined that the entire Orange County would be the most appropriate region for the project for purposes of VMT analysis. As such, as recommended in the

OPR Guidelines, if the project VMT per employee is greater than 85 percent of the existing countywide VMT per employee, the project constitutes a significant VMT impact.

4.7.5 Thresholds of Significance

The thresholds for transportation impacts used in this analysis are consistent with Appendix G of the State CEQA Guidelines and the City's Initial Study/Environmental Checklist. The proposed project may be deemed to have a significant impact with respect to transportation if it would:

Threshold TRA-1: Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities

Threshold TRA-2: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)

Threshold TRA-3: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)

Threshold TRA-4: Result in inadequate emergency access

4.7.6 Project Impacts

Threshold TRA-1: **Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**

Impact TRA-1: Less Than Significant Impact. In order to assess the impact of the proposed project on the surrounding circulation system, Urban Crossroads calculated the project-related trips using trip rates from the Institute of Transportation Engineers' (ITE) *Trip Generation Manual*, 11th Edition (2021) High-Cube Cold Storage (Land Use Code 157) **Table 4.7.5**, below, presents the trip generation comparison between the existing and proposed use.

Table 4.7.5: Proposed Project Trip Generation Comparison

Land Use	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Proposed Project Trip Generation							
Passenger Cars	262	15	1	16	4	14	18
Total Truck Trips (PCE)	342	4	9	13	7	7	14
Total Trips (PCE)	**604**	**19**	**10**	**29**	**11**	**21**	**32**
Existing Use: General Office Trip Generation							
Passenger Cars	408	50	7	57	9	45	54
Total Truck Trips (PCE)	0	0	0	0	0	0	0
Total Trips (PCE)	**408**	**50**	**7**	**57**	**9**	**45**	**54**
Net Trips (Proposed Project - Existing)	**196**	**-31**	**-3**	**-28**	**2**	**-24**	**-22**

[1] Trip rates from the Institute of Transportation Engineers' (ITE) *Trip Generation* Manual, 11th Edition (2021).

As **Table 4.7.5** shows, the proposed project is anticipated to generate a net increase of 196 two-way trips per day with a net reduction of 28 a.m. peak hour trips and a net reduction of 22 p.m. peak hour trips (in passenger car equivalents [PCE]).

Since the proposed project is likely to generate fewer than 50 net new peak-hour trips and fewer than 25 net new peak-hour trips at any single intersection, the implementation of the proposed project is not anticipated to result in any operational or LOS deficiencies; therefore, no further study is necessary.

The City's General Plan provides goals and policies to implement a balanced, functional, and efficient circulation system, and incorporate alternative modes of travel which allows for the safe movement of people and goods. General Plan policies CIR-2.5 and CIR-2.8 encourage the development of adequate sidewalks, particularly to provide connections to surrounding alternative modes of transportation. The project site currently provides sidewalks along Plaza Drive and Walker Drive allowing for pedestrian connections to nearby transit. Therefore, the proposed project would not inhibit the use of alternative transportation in the area and would not conflict with circulation policies in the General Plan. Impacts would be less than significant, and no mitigation is required.

Threshold TRA-2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Impact TRA-2: Less Than Significant Impact. The City requires that all CEQA-related VMT studies be conducted consistent with the State of California Governor's OPR Technical Advisory, and that screening criteria and impact thresholds are determined on a case-by-case basis in accordance with Caltrans' February 2020 VMT-Focused Transportation Impact Study Guide (TISG).

California Public Resources Code Section 15064.3(b)(4) states (in part) that:

> "A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household, or in any other measure."

Additionally, the OPR Technical Advisory recommends VMT screening thresholds for smaller projects. The footnote on page 12 of the OPR Technical Advisory states the following:

> "Screening Threshold for Small Projects
>
> Many local agencies have developed screening thresholds to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact."

The OPR Technical Advisory recommends that a project generating 110 average daily trips (ADT) or less be screened out of a VMT analysis due to the presumption of a less than significant impact. This

recommendation is not based on any analysis of GHG reduction but is instead based on the potential trip generation of a project that would be categorically exempt under CEQA.

As mentioned before, the proposed project includes the demolition of 150,626 square feet of office space and the construction of a new light industrial building that would be approximately 191,394 square feet in size. The proposed project does not qualify for any of the screening criteria, including the screening threshold for small projects because, as noted in **Table 4.7.5**, the proposed project would generate a net increase of 196 ADT and a total of 604 ADT. Therefore, a detailed VMT analysis was prepared.

The Orange County Transportation Analysis Model (OCTAM) was used to determine the VMT impact of the proposed project. OCTAM is a socioeconomic data-based model, hence project land uses were converted into model employment using land use-to-employment conversion factors. The ITE *Trip Generation Manual*, 11th Edition, was used to develop the conversion factors. The ITE *Trip Generation Manual* includes trip rates for different types of land uses by multiple unit types that were used to develop land use-to-employee conversion factors (i.e., employees per thousand square feet). The socioeconomic data (i.e., total number of jobs) for the proposed project were added to the project transportation analysis zone (TAZ) for the model run.

A baseline model run was conducted using the adjusted socioeconomic data for the project and project location TAZs. No circulation/network modifications were identified for inclusion in the model network. The outputs from this updated model run were used to calculate the VMT per employee for the project.

The VMT per employee metric is used to evaluate the project's proposed land use. The proposed project would constitute a significant impact if the project VMT metric is greater than 85 percent of the regional existing VMT metric. Hence the proposed project would constitute a significant impact if the project VMT per employee is greater than 85 percent of the Orange County VMT per employee (threshold). As shown in **Table 4.7.6**, the project's VMT per employee would be lower than the Orange County regional threshold; therefore, the proposed project would have a less than significant impact related to VMT, and no mitigation measures are required.

Table 4.7.6: Baseline Project and Regional VMT Per Employee Comparison

Baseline	5665 Plaza Drive (Project)	Entire Orange County[1]	Threshold[2]	% Difference	Significant Impact?
VMT per employee	20.3	24.1	20.5	-1%	No

Source: Compiled by LSA (2023).

[1] Obtained from the *Final Draft Guidelines For Evaluating Vehicle Miles Traveled Under CEQA for the County of Orange*, September 17, 2020.

[2] 85% of the regional average (24.1*0.85=20.5) baseline. Base year of the OCTAM model is 2016.

OCTAM = Orange County Transportation Analysis Model

VMT = vehicle miles traveled

Threshold TRA-3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impact TRA-3: Less Than Significant with Mitigation Incorporated. Vehicular traffic to and from the project site would utilize the existing network of regional and local roadways that serve the project area. Access to the project site would be provided via two driveways at Plaza Drive and Douglas Drive. The design of the proposed project, including the internal roadways, ingress, egress, and other streetscape changes, would be subject to review by the City's Department of Public Works. The proposed project would include the relocation of the existing driveways. The new westernmost driveway would be the primary truck access point and path to the truck loading docks on the proposed building's west side. The eastern driveway would be a shared driveway with the parcel to the east.

Traffic from the proposed project site traveling to and from Valley View Street via Plaza Drive would head northbound on Valley View Street. Any southbound traffic on Valley View Street or eastbound traffic on Katella Avenue would originate from the intersection of Douglas Drive/Warland Drive. Trucks traveling from the proposed project building would utilize Plaza Drive to Valley View Street and Douglas Drive to Katella Avenue. A portion of the truck trips would continue east on Katella Avenue while the remainder of trucks would travel south on Valley View Street, consistent with the City's approved truck routes. The proposed project would contribute fewer than 50 peak hour trips at the intersection of Valley View and Katella Avenue that would fall below the City's threshold for analysis.[84] It is anticipated that Driveway 1 (on Douglas Drive) and Driveway 2 (on Plaza Drive) would be utilized by heavy trucks to access the project site. Driveway 1 is anticipated to be able to accommodate the ingress and egress of heavy trucks as currently designed, providing access to and from the east on Plaza Drive and south on Douglas Drive. Driveway 1 would serve as the primary driveway for heavy trucks accessing the project site. While Driveway 2 would accommodate the ingress and egress of heavy trucks along Plaza Drive, it is recommended that the northwest curb of Driveway 2 be modified to accommodate a 25-foot curb radius for the egress of heavy trucks. Implementation of **Mitigation Measure TRA-1**, described below, would require the installation of on-site traffic signing and striping. With implementation of **Mitigation Measure TRA-1**, the proposed project would have a less than significant impact related to transportation hazards.

Threshold TRA-4: Would the project result in inadequate emergency access?

Impact TRA-4: Less Than Significant Impact. As described above, vehicular access to the project site would be provided via two driveways at Plaza Drive and Douglas Drive. Plaza Drive would allow for adequate emergency access and all project improvements, including driveways, would be designed consistent with applicable emergency access standards. All emergency access routes to the proposed project and adjacent areas would be kept cleared and unobstructed during demolition and construction of the proposed project. No roadway closures or lane closures are anticipated as part of project construction. Therefore, the proposed project's effects on emergency access would be less than significant, and no mitigation is required.

[84] Urban Crossroads. 2023. *Goodman Commerce Center Traffic Analysis.* November 21, 2023.

4.7.7 Level of Significance Prior to Mitigation

The proposed project would have less than significant impacts related to conflicts with a program, plan, ordinance, or policy addressing the circulation system, and emergency access. However, the proposed project would have potential impacts to hazards due to geometric design features. **Mitigation Measure TRA-1** is incorporated to reduce that potential impact to a less than significant level.

Although the City has not yet adopted VMT metrics or thresholds of significant related to VMT, a VMT analysis was conducted using the recommendations and guidance of the OPR Technical Advisory to address State CEQA Guidelines Section 15064.3 subdivision (b). Based on the VMT analysis, the proposed project would have a less than significant impact.

4.7.8 Mitigation Measures

Mitigation Measure TRA-1 **Truck Access & Routing Plan and Truck Signage and Striping Plan.** The Applicant shall submit a Truck Access and Routing Plan to accommodate the circulation of trucks on site. Additionally, the Applicant shall prepare a Signage and Striping Plan, consistent with the provisions of the California Manual on Uniform Traffic Control Devices (CA MUTCD), that directs heavy trucks to the most appropriate access point. The Public Works Director of the City of Cypress, or designee, shall review and approve the Truck Access and Routing Plan and Signage and Striping Plan and confirm they have been incorporated into the project plans prior to the issuance of a building permit.

4.7.9 Regulatory Compliance Measures

No regulatory compliance measures are applicable to the proposed project.

4.7.10 Level of Significance after Mitigation

With the implementation of **Mitigation Measure TRA-1**, potentially significant impacts would be reduced below a level of significance.

4.7.11 Cumulative Impacts

Less Than Significant Impact. As defined in the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects. Potential cumulative impacts would occur if the proposed project in combination with one or more of the cumulative projects would produce significant impacts to transportation. For purposes of analyzing potential cumulative transportation impacts, the cumulative impact study area is the traffic study area outlined in the TIA. The cumulative projects that were determined to potentially affect one or more of the four study area intersections include:

- Cypress Town Center (Multifamily Housing)
- The Square (Shopping Center / Multifamily Housing / Hotel / Medical Office Building)

- Goodman Commerce Center (High-Cube Warehousing)
- 5995 Plaza Drive (General Office)

The Future Year 2025 Condition includes the existing baseline traffic conditions, without project traffic conditions, and with project traffic conditions within the study area. Any additional traffic generated by other projects not on the cumulative projects list is likely accounted for through background ambient growth factors that have been applied to the peak hour volumes at study area intersections.

Future Year peak hour traffic operations have been evaluated for the study area intersections. As indicated in **Table 4.7.7**, the Future Year traffic conditions demonstrate that the study area intersections are anticipated to continue operating at an acceptable LOS under both Future Year Without and With Project traffic conditions.

Table 4.7.7: Future Year Plus Project Intersection Level of Service Summary

Intersection		Control	Peak Hour	2025 Without Project		2025 With Project		Project Impact	
				ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/Delay (Net Change)	Yes/No
1	Douglas Drive/Warland Drive and Katella Avenue	Signal	AM	0.477	A	0.486	A	0.009	No
			PM	0.559	A	0.565	A	0.006	No
		Signal (Delay)	AM	6.8	A	7.7	A	0.9	No
			PM	9.4	A	9.8	A	0.4	No
2	Douglas Drive/ Driveway 2 and Driveway 1/Plaza Drive	AWS	AM	N/A	N/A	N/A	N/A	N/A	No
			PM	N/A	N/A	N/A	N/A	N/A	No
		AWS (Delay)	AM	7.2	A	7.3	A	0.1	No
			PM	7.8	A	7.9	A	0.1	No
3	Existing Driveway/McDonnell Drive and Plaza Drive	CSS	AM	N/A	N/A	N/A	N/A	N/A	No
			PM	N/A	N/A	N/A	--	N/A	No
		CSS (Delay)	AM	10.9	B	10.9	B	0.0	No
			PM	12.0	B	11.9	B	(0.1)	No
4	Valley View Street and Plaza Drive/Chip Avenue	Signal	AM	0.582	A	0.582	A	0.000	No
			PM	0.856	D	0.860	D	.0004	No
		Signal (Delay)	AM	18.6	B	18.7	B	0.1	No
			PM	45.7	D	46.8	D	1.1	No

Source: *Traffic Impact Analysis* (Urban Crossroads, November 2023).
Note: Delay is reported in seconds.
CSS = cross-street stop control
ICU = Intersection Capacity Utilization
LOS = level of service
N/A = not available

As discussed in Section 4.7.4, the City of Cypress General Plan Circulation Element identifies LOS D or better as the desired citywide operating standard for most City streets. As shown in **Table 4.7.7**, traffic associated with the proposed project when combined with the cumulative projects would not exceed LOS D. Accordingly, the proposed project in combination with the cumulative projects would not conflict with circulation policies in the General Plan. Furthermore, like the proposed project, the

cumulative projects would be required to comply with applicable programs, plans, ordinances, and policies addressing the circulation system. Accordingly, the proposed project in combination with the cumulative projects would not result in significant cumulative impacts associated with conflicts with these programs, plans, and policies.

As shown above in **Table 4.7.6**, the proposed project's VMT per employee would be lower than the Orange County regional threshold; therefore, the proposed project would have a less than significant impact related to VMT. Like the proposed project, the cumulative projects would be required to evaluate VMT as part of the environmental review process for those projects. In the event significant VMT impacts were identified, the project would be required to adopt appropriate mitigation to reduce impacts to a less than significant level. Accordingly, the proposed project in combination with the cumulative projects would not result in significant cumulative impacts associated with VMT.

The proposed project would result in a less than significant impact with mitigation incorporated in relationship to design hazards. This mitigation would include a truck access and routing plan and truck signage and striping to help accommodate truck access to the proposed project driveways. Similarly, the neighboring Goodman Center Project would also incorporate a truck access and routing plan and truck signage and striping to help accommodate truck access. It is assumed that the other cumulative projects would be designed in a manner consistent with the City's design standards and designs would be subject to review and approval by the City's Public Works Department. Consistency with the City's requirements would prevent implementation of design hazards. Accordingly, the proposed project in combination with the cumulative projects would not result in significant cumulative impacts associated with design hazards.

Finally, the proposed project would allow for adequate emergency access via the two planned driveways. Similar to potential design hazards, it is assumed that the cumulative projects would be designed to meet the City's design standards and would be approved by the City prior to implementation. Therefore, the proposed project in combination with the cumulative projects would not result in significant cumulative impacts associated with emergency access.

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4.8 TRIBAL CULTURAL RESOURCES

This section provides a discussion of the existing tribal cultural resource environment and an analysis of potential impacts due to implementation of the 5665 Plaza Drive Project (proposed project). According to California PRC Section 21080.3.1 and Chapter 532, Statutes 2014 (i.e., AB 52), "tribal cultural resources" are defined as the following:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either: (A) included or determined to be eligible for inclusion in the California Register of Historical Resources; or (B) included in a local register of historical resources as defined in subdivision (k) of Section 5020.1

2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1

This section summarizes information obtained from SB 18 and AB 52 Native American consultation efforts completed in support of the proposed project. The record of these consultation efforts is contained in **Appendix H** of this EIR.

4.8.1 Scoping Process

The City received 3 comment letters during the public review period for the NOP. For copies of the NOP comment letters, refer to **Appendix A** of this Draft EIR. One comment letter included comments related to tribal cultural resources. The letter from the Native American Heritage Commission (NAHC) received on June May 10, 2024, outlined the City's tribal consultation requirements under AB 52 and SB 18.

4.8.2 Regulatory Setting

4.8.2.1 Federal Regulations

Archaeological Resources Protection Act of 1979 (6 U.S.C. § 470aa *et seq*.). The Archaeological Resources Protection Act was enacted in 1979 with the purpose of securing the protection of archaeological resources and sites on public lands and Native American lands, and to foster increased cooperation and exchange of information between governmental authorities, the professional archaeological community, and private individuals.

Native American Graves Protection and Repatriation Act (25 U.S.C. ch. 32 § 3001 *et seq*.).The Native American Graves Protection and Repatriation Act (NAGPRA) was passed in 1990 with the purpose of outlining a process for museums and federal agencies to return certain Native American cultural items (e.g., human remains, funerary objects, sacred objects, or objects of cultural patrimony) to lineal descendants, and culturally affiliated Indian tribes. NAGPRA also establishes procedures for the inadvertent discovery or planned excavation of Native American cultural items on federal or tribal lands. While these provisions do not apply to discovery or excavations on private or State lands, the collection portions of NAGPRA may apply to cultural items if they are under the control of an institution that receives federal funding. NAGPRA also makes it a criminal offense to traffic in Native American human remains without right of possession or in cultural items obtained in violation of NAGPRA.

4.8.2.2 State Regulations

Native American Heritage Commission (NAHC). In 1976, the California State Government passed AB 4239, creating the NAHC. The NAHC is responsible for identifying and categorizing Native American cultural resources as well as preventing damage to designated sacred sites and associated artifacts and remains. Legislation passed in 1982 authorized the NAHC to identify a Most Likely Descendant (MLD) when Native American remains are found outside the boundaries of a designated cemetery. An MLD has the authority to make recommendations in regard to the treatment and disposition of the discovered remains.

California Public Resources Code Sections 5097.9–5097.991. California PRC Sections 5097.9–5097.991 provide protection to Native American historical and cultural resources (including sanctified cemeteries, places of worship, religious sites, or sacred shrines) and sacred sites, and gives the NAHC enforcement authority.

Specifically, California PRC Section 5097.98 outlines procedures that must be followed in the event that human remains are discovered. The County Coroner shall make a determination within 2 working days from the time the person responsible for the excavation, or designee, notifies the County Coroner of the discovery or recognition of the human remains. If the County Coroner identifies the remains to be of Native American origin or has reason to believe that the remains are those of Native American origin, the County Coroner must contact the California NAHC within 24 hours. The NAHC representative will then alert a Native American MLD to conduct an inspection of the site and to determine the following course of treatment and action. Additionally, State CEQA Guidelines Section 15064.5 sets forth a procedure if human remains are found on land outside of federal jurisdiction.

Health and Safety Code Section 7050.5. Section 7050.5 of the California Health and Safety Code protects Native American burials, remains, and associated grave artifacts in the event they are discovered in any location other than a designated cemetery. The Health and Safety Code mandates the immediate stop of excavation on the site as well as any adjacent or overlying area where the remains or associated items are found and provides for the sensitive disposition of those remains. Should remains be discovered, the County Coroner must determine that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or designee, in the manner provided in PRC Section 5097.98.

Senate Bill 18 Tribal Consultation. California Government Code Section 65352.3 (adopted pursuant to the requirements of SB 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a General or Specific Plan. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction and are identified, upon request, by the NAHC. As noted in the Governor's Office of Planning and Research's *Tribal Consultation Guidelines, Supplement to General Plan Guidelines* (2005)[85], "the intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places."

Assembly Bill 52 Tribal Consultation. California PRC Section 21080.3.1 and Chapter 532, Statutes 2014 (i.e., AB 52), require that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource, as defined, is a project that may have a significant effect on the environment. The bill requires a lead agency to begin consultation with each California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation, prior to determining whether a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report is required for a project. The bill specifies examples of mitigation measures that may be considered to avoid or minimize impacts on tribal cultural resources. The bill makes the above provisions applicable to projects that have a Notice of Preparation or a notice of Negative Declaration or Mitigated Negative Declaration filed on or after July 1, 2015. By requiring the lead agency to consider these effects relative to tribal cultural resources and to conduct consultation with California Native American tribes, this bill imposes a State-mandated local program.

4.8.2.3 Regional Regulations

There are no regional regulations that are applicable to tribal cultural resources relevant to the proposed project.

4.8.2.4 Local Regulations

There are no local regulations that are applicable to tribal cultural resources relevant to the proposed project.

4.8.3 Existing Environmental Setting

The area that is now the City of Cypress was prehistorically occupied by several different Native American tribes with unique oral histories, societal structures, and ways of life. This area is within the traditional boundaries of the Gabrielino. To date, no federally recognized tribes claim to have occupied the land that is now considered the City of Cypress.

4.8.4 Methodology

4.8.4.1 Senate Bill 18

California Government Code Section 65352.3 (adopted pursuant to the requirements of SB 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a General or Specific Plan. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction and are identified, upon request, by the NAHC. As noted in the Governor's Office of Planning and Research's *Tribal Consultation Guidelines, Supplement to General Plan Guidelines* (2005),[85] "The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places."

[85] Governor's Office of Planning and Research (OPR). 2005. *Tribal Consultation Guidelines, Supplement to General Plan Guidelines*. Website: https://www.parks.ca.gov/pages/22491/files/tribal_consultation_guidelines_ vol-4.pdf (accessed May 2023).

The NAHC was contacted to conduct a SLF search and to provide a list of Native American contacts for the project pursuant to SB 18. The NAHC responded on November 16, 2023, stating than an SLF search was completed for the opportunity sites with negative results. The NAHC recommended that 21 Native American individuals representing the Diegueno, Kumeyaay, Gabrielino, Gabrielino/ Tongva, Juaneño, Cahuilla, and Luiseño groups be contacted for information regarding tribal cultural resources that could potentially be affected by the project. These 21 individuals were contacted via letter by certified mail on November 20, 2023. The letters, which concurrently fulfilled both SB 18 and AB 52 requirements, provided each tribe with an opportunity to request consultation with the City regarding the proposed project. In compliance with SB 18, the tribes had 90 days from the date of receipt of notification to request consultation on the proposed project. A response was received from Chairman Andrew Salas on behalf of the Gabrieleño Band of Mission Indians – Kizh Nation. This response did not request consultation on the project but did request consultation on future projects within the area.

4.8.4.2 Assembly Bill 52

Chapter 532, Statutes of 2014 (i.e., AB 52), requires that Lead Agencies evaluate a project's potential to impact "tribal cultural resources." Such resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register or included in a local register of historical resources (PRC Section 21074). AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource falling outside the definition stated above nonetheless qualifies as a "tribal cultural resource."

Also, per AB 52 (specifically PRC Section 21080.3.1), as Lead Agency, the City must consult California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site and have previously requested that the Lead Agency provide the tribe with notice of such projects. Only one response was received in response to the City's AB 52 letters. The Kizh Nation emailed City staff to request consultation. The Kizh Nation sent the City proposed mitigation measures for tribal cultural resources, which the City accepted with no modifications or revisions.

Letters have also been sent to Native American tribal contacts provided by the NAHC, as previously described. The letters, simultaneously compliant with both SB 18 and AB 52 guidelines, provided each tribe with an opportunity to request consultation with the City regarding the proposed project. In compliance with AB 52, tribes had 30 days from the date of receipt of notification to request consultation on the proposed project. No requests for consultation on the project were received in response to the transmitted SB 18/AB 52 combination letters.

4.8.5 Thresholds of Significance

The thresholds for tribal cultural resources impacts used in this analysis are consistent with Appendix G of the State CEQA Guidelines and the City's Initial Study/Environmental Checklist. The proposed project may be deemed to have a significant impact with respect to tribal cultural resources if it would:

Threshold TCR-1: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site,

feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).

Threshold TCR-2: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

4.8.6 Project Impacts

Threshold TCR-1: **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?**

Impact TCR-1: No Impact. As previously discussed in Section 4.2, Cultural Resources, of this EIR, the project site does not contain any known historical resources. In addition, an SLF search for the site was requested from the NAHC on September 27, 2023, and no resources were noted in the database based on NAHC correspondence, dated November 16, 2023.

Native American consultation was conducted in compliance with AB 52. As part of the consultation process, a review of the SLF by the NAHC yielded negative results. Subsequently 21 Native American representatives were contacted by the City to determine their desire to consult on the proposed project, as detailed below.

- Campo Band of Diegueno Mission Indians
- Ewiiaapaayp Band of Kumeyaay Indians
- Gabrieleño Band of Mission Indians - Kizh Nation
- Gabrieleño/Tongva San Gabriel Band of Mission Indians
- Gabrielino/Tongva Nation
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino-Tongva Tribe
- Juaneño Band of Mission Indians Acjachemen Nation - Belardes

- Juaneño Band of Mission Indians Acjachemen Nation 84A
- La Posta Band of Diegueno Mission Indians
- Manzanita Band of Kumeyaay Nation
- Mesa Grande Band of Diegueno Mission Indians
- Pala Band of Mission Indians
- Santa Rosa Band of Cahuilla Indians
- Soboba Band of Luiseño Indians

During that process, the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) stated that the project site is within their tribal territory and requested consultation with the City. The Kizh Nation was provided with a summary of the project and its location. No information regarding specific known tribal cultural resources on the project site was provided by the Kizh Nation. Therefore, the proposed project would not result in any impacts to tribal cultural resources that are listed or eligible for listing in the State or local register of historical resources. No mitigation is required.

Threshold TCR-2: **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

Impact TCR-2: Less Than Significant with Mitigation Incorporated. Effective July 1, 2015, AB 52 requires meaningful consultation with California Native American Tribes on potential impacts to Tribal Cultural Resources, as defined in California PRC Section 21074. A tribe must submit a written request to the relevant lead agency if it wishes to be notified of proposed projects in its traditionally and culturally affiliated area. The lead agency must provide written formal notification to the tribes that have requested it within 14 days of determining that a project application is complete or of deciding to undertake a project. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Consultation concludes when either (1) the parties agree to mitigation measures to avoid a significant effect, if one exists, on a tribal cultural resource, or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. AB 52 also addresses confidentiality during tribal consultation per PRC Section 21082.3(c).

California Government Code Section 65352.3 (adopted pursuant to the requirements of SB 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan, or to designate open space that includes Native American Cultural Places.

Correspondence to the tribes recommended by NAHC was transmitted on November 20, 2023. The City currently maintains a list of tribal councils based on a list of councils and corresponding Native American representatives that have requested to be notified of proposed projects in their respective areas of traditional and cultural affiliation. All tribal contacts on this list were sent a letter from the City on November 20, 2023, for the purposes of AB 52 consultation. Only one response was received in response to the City's AB 52 letters. The Kizh Nation emailed City staff to request consultation. The Kizh Nation sent the City proposed mitigation measures for tribal cultural resources, which the City accepted with no modifications or revisions.

As discussed previously in Section 4.2 Cultural Resources, the project site does not contain any "historical resources" as defined by CEQA. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines or PRC 5020.1(k).

The project site is not likely to contain any prehistoric site or archaeological resources based on archival research and field surveys conducted for the project site. There is little potential for the proposed project to impact prehistoric resources due to the low likelihood of resource presence, significant prior disturbance from past grading and development activities on the project site and in the surrounding area. However, **Mitigation Measure CUL-1**, as provided in Section 4.2 Cultural Resources, has been included to mitigate potentially significant impacts associated with the unlikely discovery of archaeological resources, including tribal cultural resources (TCRs), on the project site. Therefore, implementation of **Mitigation Measure CUL-1** would reduce potentially significant impacts to unknown tribal cultural resources to a less than significant level.

The project site is not likely to contain any human remains due to the fact that soils on the site have been previously disturbed associated with prior disturbance from past grading and development activities on the project site and surrounding area. However, **Regulatory Compliance Measure CUL-1**, as provided in Section 4.2, has been included to mitigate potentially significant impacts associated with the unlikely discovery of human remains, including those determined to be of Native American descent, on the project site. Therefore, implementation of **Regulatory Compliance Measure CUL-1** would reduce potentially significant impacts to unknown human remains to a less than significant level.

As noted above, the Kizh Nation provided mitigation measures to address potential impacts related to tribal cultural resources. Implementation of **Mitigation Measures TCR-1 through TCR-3**, which incorporate the recommendations of the Kizh Nation, would reduce any potential impacts to previously undiscovered tribal cultural resources to a less than significant level. Therefore, on this basis and as a result of the City's consultation with the Kizh Nation or any other interested local Native American tribe, the City has concluded that, with implementation of **Mitigation Measures TCR-1 through TCR-3**, potential impacts related to unknown buried tribal cultural resources would also be reduced below a level of significance.

4.8.7 Level of Significance Prior to Mitigation

No impacts to known tribal cultural resources listed or eligible for listing in the California Register or in a local register would occur. Prior to mitigation, the proposed project has the potential to result in significant impacts to previously undiscovered tribal cultural resources.

4.8.8 Regulatory Compliance Measures and Mitigation Measures

4.8.8.1 Regulatory Compliance Measures

No Regulatory Compliance Measures are required.

4.8.8.2 Mitigation Measures

Refer to **Mitigation Measures TCR-1 through TCR-3**.

Mitigation Measure TCR-1

Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities. The project Applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation). The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project Applicant/lead agency upon written request to the Tribe.

On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh Nation from a designated point of contact for the project Applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh Nation to the project Applicant/lead agency

that no future, planned construction activity and/or development/ construction phase at the project site possesses the potential to impact Kizh Nation TCRs.

Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh Nation monitor and/or Kizh Nation archaeologist. The Kizh Nation will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

Mitigation Measure TCR-2

Unanticipated Discovery of Human Remains and Associated Funerary Objects. Native American human remains are defined in Public Resources Code 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.

Human remains and grave/burial goods shall be treated alike per California Public Resources Code Section 5097.98(d)(1) and (2).

Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh Nation determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh Nation monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)

Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Mitigation Measure TCR-3

Procedures for Burials and Funerary Remains. As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.

If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.

The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.

In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.

In the event preservation in place is not possible despite good faith efforts by the project Applicant/developer and/or landowner,

before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.

Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

4.8.9 Level of Significance after Mitigation

No impacts to known tribal cultural resources listed or eligible for listing in the California Register or in a local register would occur. **Mitigation Measures TCR-1 through TCR-3** would reduce potential impacts to newly discovered tribal cultural resources to a less than significant level.

4.8.10 Cumulative Impacts

Defined in Section 15130 of the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and reasonably foreseeable probable future projects in an area of interest.

The proposed project would result in less than significant impacts to known and unknown tribal cultural resources listed or eligible for listing in the California Register, in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or otherwise determined by the lead agency to be significant. Further, each individual development proposal received by the City that requires discretionary approval is required to undergo individual environmental review pursuant to CEQA. AB 52 outreach would be required for those discretionary projects for which a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report is prepared. Furthermore, impacts of other projects on tribal cultural resources are generally site-specific resulting from ground-disturbing activities, which would require unique impact analysis to

determine the nature and extent of the resources and identify appropriate mitigation measures that would reduce or avoid significant impacts. Thus, there is no potential for the project to contribute towards a significant cumulative impact associated with the significance of a tribal cultural resource pursuant to California Code of Regulations Section 15064.5.

Additionally, when resources can be assessed and/or protected as they are discovered, impacts to these resources are less than significant. As such, implementation of **Mitigation Measures TCR-1 through TCR-3** would ensure that the proposed project, together with the related projects, would not result in significant cumulative impacts to tribal cultural resources.

5.0 ALTERNATIVES

5.1 INTRODUCTION

This chapter of the EIR identifies potential alternatives to the 5665 Plaza Drive Project in the City of Cypress. This discussion includes a summary of the project and the project objectives, the project- related impacts, identification of the alternatives considered but rejected from further analysis, and presentation of the alternatives analysis, as well as identification of the environmentally superior alternative.

CEQA Guidelines Section 15126.6 requires that an EIR include a discussion of a reasonable range of project alternatives that would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project and evaluate the comparative merits of the alternatives." EIRs are not required to evaluate alternatives that are infeasible, rather the purpose of the alternatives analysis is to foster informed decision making and public participation.

CEQA Guidelines Sections 15126.6 (e) and (f) specify:

- The "no project" alternative shall also be evaluated, along with its impact. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

- The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the proposed project. Of those alternatives, the EIR needs to examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the proposed project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making.

In addition to specifying that the EIR evaluate a range of reasonable alternatives to the proposed project, Section 15126.6 (c) of the CEQA Guidelines requires that an EIR identify any alternatives that were considered but were rejected as infeasible. Pursuant to the CEQA Guidelines, alternatives to the proposed project, including any considered but rejected, are also evaluated in this section.

5.2 SELECTION OF ALTERNATIVES

Section 21100 of the Public Resources Code and Section 15126 of the State CEQA Guidelines require an EIR to identify and discuss a No Project Alternative and a reasonable range of alternatives to the proposed project that would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant environmental impacts. Each

of the potentially significant impacts of the proposed project is capable of being mitigated to below a level of significance. The alternatives considered in this EIR include the following:

- **Alternative 1: No Project Alternative:** Consistent with State CEQA Guidelines Section 15126.6, the No Project Alternative assumes the existing land uses and condition of the project site at the time the Notice of Preparation (NOP) was published (May 2024) would remain unchanged. Under the No Action Alternative, the existing five-story office building on the project site would remain in place. The No Project Alternative represents the environmental conditions that would exist if no new development of any kind were to occur on the project site. The setting of the project site at the time the NOP was published is described in Chapter 4.0 of this Draft EIR with respect to individual environmental issues and forms the baseline of the impact assessment of the proposed project. While the No Project Alternative would avoid the potential impacts of the proposed project and require no mitigation measures, none of the project objectives would be achieved.

- **Alternative 2: Reduced Footprint Alternative:** Alternative 2 would occupy the same building footprint as the proposed project and would include the construction and operation of a light-industrial building on the project site; however, Alternative 2 would reduce the project footprint by one-third (33 percent). Under this alternative, it is assumed that the light industrial building would be built out at 127,596 square feet (63,798 square feet smaller than the proposed project) and operate at a reduced capacity as compared to the proposed project. Similar to the proposed project, Alternative 2 would be located on the same approximately 8.53-acre project site, include demolition of the existing 150,626-square-foot five-story office building, and construction of a new light industrial building, with associated landscaping, surface parking, and utility improvements. Alternative 2 would provide the same number of loading docks on the western side of the proposed building (25 docks) and the same number of parking spaces (206 parking stalls) on all sides of the new building. Similar to the proposed project, Alternative 2 would relocate the two existing driveways, providing a new westernmost driveway that would be the primary truck access point and path to the truck loading docks on the proposed building's west side, and a new eastern driveway, which would be a shared driveway with the parcel to the east.

- **Alternative 3 – No Refrigeration Warehouse Alternative:** Alternative 3 would occupy the same building footprint as the proposed project; however, the proposed building would not include cold storage space, nor would it accommodate the transport of refrigeration units by trucks accessing the project site. Because the proposed building would not accommodate refrigeration, Alternative 3 would utilize less energy and produce fewer operational emissions of criteria pollutants and greenhouse gases. Similar to the proposed project, Alternative 3 would be located on an approximately 8.53-acre site and include the demolition of the existing 150,626-square-foot five-story office building on the project site and the construction of a new 191,394-square-foot light industrial building with 181,061 square feet of warehouse space and 10,333 square feet of office space with associated landscaping, surface parking, and utility improvements. Alternative 3 would provide the same number of loading docks on the west side of the proposed building and include the same number of parking spaces on all sides of the new building. Additionally, similar to the proposed project, Alternative 3 would relocate

two existing driveways, providing a new westernmost driveway that would be the primary truck access point and path to the truck loading docks on the proposed building's west side and a new eastern driveway, which would be a shared driveway with the parcel to the east.

- **Alternative 4: Deep Dynamic Compaction and Stone Columns:** Alternative 4 would occupy the same building footprint as the proposed project; however, under Alternative 4, both deep dynamic compaction and stone columns would be utilized during construction to reduce the liquefaction potential of project soils. Deep dynamic compaction is a ground improvement technique which involves the repeated dropping of a heavy weight onto the ground surface from a predetermined height to improve the density and load-bearing capacity of soil layers. Similar to the proposed project, Alternative 4 would utilize a 10-ton weight which would be dropped at a height of 60 feet. Stone columns involve filling pre-augered cavities with aggregate, the aggregate is then compacted using static crowd pressure combined with a high frequency, low amplitude vibratory hammer. Deep dynamic compaction and stone columns would reduce the vibratory impact of the proposed project, as the proposed project would only utilize deep dynamic compaction methods for soil compaction. Under Alternative 4, stone columns would be placed around the periphery of the project site, while deep dynamic compaction would only be implemented near the central portions of the project site to reduce vibratory impacts to nearby buildings. Similar to the proposed project, Alternative 4 would be located on an approximately 8.53-acre site and include the demolition of the existing 150,626-square-foot five-story office building on the project site and the construction of a new 191,394-square-foot light industrial building with 181,061 square feet of warehouse space and 10,333 square feet of office space with associated landscaping, surface parking, and utility improvements. Alternative 4 would provide the same number of loading docks on the west side of the proposed building and include the same number of parking spaces on all sides of the new building. Additionally, similar to the proposed project, Alternative 4 would relocate two existing driveways, providing a new westernmost driveway that would be the primary truck access point and path to the truck loading docks on the proposed building's west side and a new eastern driveway, which would be a shared driveway with the parcel to the east.

For the purpose of this analysis, it is assumed that all of the alternatives would comply with applicable federal, State, and local regulations, policies, and ordinances. The alternatives and their impacts are further described below. The Alternatives analysis provides the following:

- A description of the alternative;

- An analysis of the potential environmental impacts of the alternative and the significance of those impacts (per Section 15126.6 of the State CEQA Guidelines, significant effects of an alternative shall be discussed but, in less detail, than those of the proposed project); and

- Summary comparison of the alternative relative to the proposed project's impacts, specifically addressing whether the alternative would meet the project objectives, eliminate or reduce impacts as compared to the project, and include other comparative merit.

5.2.1 Project Summary

As described in Chapter 3.0, Project Description, the proposed project would include the demolition of an existing five-story office building on the project site and the construction of a concrete tilt-up light industrial building. The proposed building would be 191,394 square feet in size including 181,061 square feet of warehouse space and 10,333 square feet of office space (5,184 square feet on the first floor and 5,149 square feet on the second floor). The proposed office space would be located at the southeast corner of the building. The maximum building height would be approximately 51 feet, 6 inches, to the top of the parapet on the northeast and southeast corners of the building; however, the majority of the building would have a maximum height of 40 feet. Additionally, the proposed project would include associated site improvements, including landscaping, surface parking, and utility improvements.

5.2.2 Project Objectives

The alternative is analyzed to determine whether it achieves the basic objectives of the proposed project. The underlying purpose of the proposed project would be to meet a greater market demand for state-of-the-art light industrial buildings by replacing a vacant office building. As stated in Chapter 3.0, the City has established the following intended specific objectives for the proposed project that would serve to aid decision-makers in their review of the proposed project and its associated environmental impacts:

1. To meet a greater market demand for state-of-the-art light industrial buildings by replacing a vacant office building.

2. To promote development that will attract new businesses to operate in the City.

3. To encourage business development that will generate a range of employment opportunities for the community.

4. To help attract new business enterprises that will result in a positive flow of revenue to the City.

5.2.3 Project-Related Impacts

As described further in Chapter 2.0, Introduction, the Initial Study (IS) for the proposed project (**Appendix B**) determined that all impacts would be less than significant for Aesthetics, Agricultural/Forestry Resources, Biological Resources, Hazards and Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mineral Resources, Population/Housing, Public Services, Recreation, Utilities/Service Systems, and Wildfire. Accordingly, this EIR addresses potential impacts associated with Air Quality, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Noise, Transportation, and Tribal Cultural Resources.

The proposed project would result in less than significant impacts to Air Quality, Energy, and Greenhouse Gas Emissions. No mitigation measures would be required to reduce project-related impacts, and the proposed project would not result in any significant unavoidable impacts.

The proposed project would result in less than significant impacts with mitigation incorporated to Cultural Resources, Geology and Soils, Noise; Transportation/Traffic; and Tribal Cultural Resources.

For the purpose of this alternatives analysis, it is assumed the alternatives would comply with applicable federal, State, and local regulations, policies, and ordinances. It is also assumed that all mitigation measures required for project implementation would also apply to any project alternative and that similar reductions in impacts would be achieved through such mitigation. Therefore, the following discussion focuses on the ability of the alternative to further reduce or lessen project impacts and the potential impacts of the project related to these issues.

5.3 ALTERNATIVES INITIALLY CONSIDERED BUT REJECTED FROM FURTHER CONSIDERATION

The following is a discussion of the development alternatives considered during the environmental review process and the reasons they were not selected for detailed analysis in the Alternatives section of this Draft EIR.

5.3.1 Alternative Sites Considered

In accordance with Section 15126.6(c) of the CEQA Guidelines, an EIR should identify alternatives considered for analysis but rejected as infeasible and briefly explain the reasons for their elimination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR is failure to meet most of the basic project objectives, infeasibility, or inability to avoid or substantially reduce significant environmental impacts. Alternatives that have been initially considered and rejected as infeasible include the following, which have been rejected, as detailed below, either because they would create new or more severe impacts compared to the proposed project, are repetitive of other alternatives, would not meet the project objectives and requirements, or are otherwise considered infeasible.

5.3.2 Off-Site Alternative

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant impacts of the project. The key question and first step in the analysis is whether any of the significant impacts of the project would be avoided or substantially lessened by relocating the project. Only locations that would avoid or substantially lessen any of the significant impacts of the project need be considered for inclusion in the EIR (State CEQA Guidelines, Section 15126.6[f][2][A]). Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the Project Applicant can reasonably acquire, control, or otherwise have access to the alternative site (State CEQA Guidelines Section 15126.6[f][1]). If it is determined that no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion (State CEQA Guidelines Section 15126.6[f][2][B]).

No alternative locations where the proposed project could be undertaken are analyzed in the Draft EIR. As discussed further below, there is no other property in the City that would support a development similar to the proposed project. The surrounding area is highly urbanized, and there

is no land of sufficient size currently available for development (approximately 8.53 acres) to develop the proposed project in an area that would be compatible with light industrial uses. In addition, the Applicant/Developer does not own or control any other property within the City or in the vicinity of the project site that would be suitable for development of the proposed project. Moreover, the Applicant/Developer cannot reasonably acquire or control an alternative site in a timely fashion that would allow for the implementation of a project with similar uses and square footage.

The following alternative sites were considered as potential alternatives to the project site, but eliminated for the reasons discussed above and below:

Alternative Site within the Specific Plan Area: The planning areas within the McDonnell Specific Plan Area are primarily designated for industrial, warehouse, office, and commercial uses. The light industrial uses of the proposed project would be compatible with the uses in Planning Area 1 (Industrial/Warehouse/Office) and Planning Area 2 (Industrial Warehouse). The proposed project is located in Planning Area 1. Planning Area 1 encompasses a total of approximately 16 acres. There is insufficient available space in the remaining parts of Planning Area 1 to accommodate the proposed project. Planning Area 2 is located directly adjacent to Planning Area 1 and encompasses an area of approximately 15 acres. There would be insufficient space within Planning Area 2 as all available areas are already built out or projects are currently under construction. As such neither planning area would have sufficient space to accommodate the proposed project. Development of the proposed project within another portion of the McDonnell Specific Plan is not a feasible option. Therefore, alternative sites within the specific plan area were rejected from further consideration and are not analyzed further in this Draft EIR.

Cypress Town Center and Commons Specific Plan 2.0: The Cypress Town Center and Commons Specific Plan 2.0, approved by voters in 2018 as part of a ballot initiative (Measure A), covers an approximately 154.4-acre area located approximately 1.1 mile west of the project site and generally bound by Cerritos Avenue, Katella Avenue, and Lexington Drive. The Cypress Town Center and Commons Specific Plan 2.0 established a comprehensive master plan and regulatory framework to develop a town center, housing, and public park space in parts of the Los Alamitos Race Course, the former Cypress Golf Club, and adjacent property. Although some of the property included in the Cypress Town Center and Commons Specific Plan 2.0 area may be currently available for development, the use of this potential alternative site for the proposed project is infeasible for several reasons. First, the Project Applicant does not own or control this land. Second, the available area within the Cypress Town Center and Commons Specific Plan 2.0's Town Center District, is planned for a variety of retail, entertainment, commercial, and residential uses to create a gathering place and "main street" for the community. Despite the fact that the light industrial facility included in the proposed project would not be an expressly prohibited use, it is reasonable to conclude that the facility would not be permitted within the Town Center District because it shares some key characteristics (a warehouse, loading docks, and large volumes of goods entering the site via trucks) with other land uses such as warehousing, that are expressly prohibited within the Town Center District. In addition, the proposed project's uses would not be permitted in any of the other land use districts in the Cypress Town Center and Commons Specific Plan 2.0 area. As noted above, the Cypress Town Center and Commons Specific Plan 2.0 was approved by the voters of the City of Cypress; therefore, with the exception of certain minor

adjustments, it may only be amended or repealed by a vote of the people. Development of the proposed project within the Cypress Town Center and Commons Specific Plan 2.0 is not a feasible option.

Development of the proposed project at an alternative site (assuming one was available) could potentially result in some environmental impacts that would be similar to or greater than those of the proposed project's environmental impacts, depending on the proximity of the alternate site to sensitive uses. Conversely, given that the project site is located in a highly urbanized area, it is unlikely that relocating the proposed project to another site would substantially lessen any of its impacts.

As such, no alternative sites were considered feasible because, as discussed above, the Applicant/ Developer does not own or control another project site in the City, no suitable alternative site is available that would achieve the underlying purpose and objectives of the proposed project, and development of the proposed project on an alternative site would likely result in many of the same environmental impacts as development of the proposed project on the project site. For these reasons, the alternative sites option was rejected from further consideration.

5.4 ALTERNATIVES UNDER CONSIDERATION

The following is a discussion of the alternatives considered in this EIR.

5.4.1 Alternative 1: No Project Alternative

Consistent with State CEQA Guidelines Section 15126.6, the No Project Alternative assumes the existing land uses and condition of the project site at the time the NOP was published (May 2024) would continue to exist without any changes. The setting of the project site at the time the NOP was published is described throughout Chapter 4.0 of this Draft EIR with respect to individual environmental issues and forms the baseline of the impact assessment of the proposed project. The No Project Alternative represents the environmental conditions that would exist if no new development of any kind were to occur on the project site. The No Project Alterative would allow existing conditions on the project site to remain unchanged. While the No Project Alternative would lessen or avoid impacts of the proposed project and require no mitigation measures, none of the project objectives would be achieved.

The following provides a description of the No Project Alternative and its anticipated environmental impacts. The emphasis of the analysis is on comparing the anticipated environmental impacts of the No Project Alternative to the environmental impacts associated with the proposed project. The discussion includes a determination of whether or not the No Project Alternative would reduce, eliminate, or create new significant environmental impacts and would or would not meet the objectives of the proposed project.

5.4.1.1 Environmental Analysis

Air Quality. The No Project Alternative would not require grading or construction, and, assuming no increase in occupancy to the existing office building, would not change or increase the intensity of the existing on-site use, nor increase vehicle trips to and from the project site. If the proposed project were not approved, the existing office building could be re-leased to tenants and new

tenants could move into the currently vacant office space, which would substantially increase vehicle trips in the area. Therefore, no additional air pollutant emissions related to construction and operations would be generated under the No Project Alternative. The No Project Alternative would result in **no impacts** to air quality. Therefore, the level of impact associated with this issue would be less under the No Project Alternative than the proposed project.

Cultural Resources. The No Project Alternative would not require any grading, site work, or demolition because no new development would occur on the project site. No buildings would be constructed on the project site. As no ground disturbance would occur, there is no potential for impacts to previously unidentified or as-of-yet undiscovered cultural materials that may exist at the project site. **No impacts** to on-site cultural resources would occur under this alternative. The level of impact associated with this issue would be less under the No Project Alternative than the proposed project.

Energy. The No Project Alternative would not require any grading, site work, or demolition due to construction on the project site. No new buildings would be constructed on the project site and no increased operations would occur. If the proposed project were not approved, the existing office building could be re-leased to tenants and new tenants could move into the currently vacant office space, which would increase energy demand from current conditions and increase vehicle trips to and from the project site. If no re-occupancy occurred (which is possible without any associated environmental review under existing permits), there would be no increased energy use under the No Project Alternative over existing conditions, resulting in no impacts related to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operations. Therefore, **no impact** related to energy resources would occur under this alternative. The level of impact associated with this issue would be less under the No Project Alternative than the proposed project.

Geology and Soils. The No Project Alternative would not require any grading, excavation, or site work because no demolition or construction activities would occur on the project site. As the project site would not be redeveloped under this alternative, no impact or increased potential for damage to structures/facilities or injury to persons resulting from geologic conditions or seismic/seismic-related events would occur. Furthermore, in the absence of any modification requiring ground disturbance, there would be no potential for impacts to previously unidentified or as-of-yet undiscovered potential paleontological resources that may be located on the project site. While the proposed project included **Regulatory Compliance Measure GEO-1** and **Mitigation Measure GEO-1 through Mitigation Measure GEO-2** to reduce impacts to liquefaction and paleontological resources to a less than significant level, **no impact** to geology and soils would occur under this alternative. The level of impact associated with this issue would be less under the No Project Alternative than the proposed project.

Greenhouse Gas Emissions. The No Project Alternative would not require any grading or site work because no new development would occur on the project site. No new buildings would be constructed on the project site. Although this alternative does not assume that the existing office building would be re-occupied in its entirety, it is possible that the building could be re-leased to new tenants. The increase in occupancy would increase emissions beyond what was assumed in this EIR as “baseline” conditions (e.g., 25 percent occupancy). Re-occupancy of the building could

occur without the need for additional environmental review. Therefore, although this alternative is assumed not to increase greenhouse gas emissions from new on-site uses or additional vehicle trips, based on the assumption that existing conditions would continue, emissions could increase substantially if the building is re-tenanted. No impacts related to greenhouse gas emissions would occur. Therefore, No Project Alternative would result in **no impact** to greenhouse gas emission. The level of impact associated with this issue would be reduced under the No Project Alternative compared to the proposed project.

Noise. The No Project Alternative would not involve any grading, deep dynamic compaction activities, construction vehicle, or truck trips, nor would it involve demolition activities. Therefore, the noise impacts that are typically associated with grading and construction would not occur under this alternative. While the proposed project includes **Regulatory Compliance Measure NOI-1** and **Mitigation Measure NOI-1** to reduce impacts to construction noise and vibration to a less than significant level, all construction impacts associated with this alternative are likely to be reduced and there would be **no impact**. If the proposed project were not approved, the existing office building could be re-leased to tenants and new tenants could move into the currently vacant office space, which would increase vehicle trips to and from the project site and thus increase traffic noise in the area. If no re-occupancy occurred (which is possible without any associated environmental review under existing permits), no noise impacts would occur. Additionally, the stationary noise sources associated with proposed industrial uses would be eliminated, reducing the ambient noise levels. Therefore, this alternative would result in **no impact** related to noise and vibration. The level of impact associated with this issue would be less under the No Project Alternative than the proposed project

Transportation. Under The No Project Alternative, the project site would remain in its current developed state, which includes an existing office building. This alternative would not directly result in an increase in daily traffic volumes on local or regional roadways; therefore, traffic operations at intersections and on roadway segments would not be altered. However, If the proposed project were not approved, the existing office building could be re-leased to tenants, and new tenants could move into the currently vacant office space. Under this scenario, vehicle trips would increase beyond what were assumed to be in this EIR as baseline conditions. A fully occupied office building would significantly increase trips beyond currently existing conditions. While the proposed project includes **Mitigation Measure TRA-1** to reduce impacts to reduce transportation hazards related to truck access and signage to a less than significant level, all impacts associated with this alternative are likely to be reduced and there would be **no impact** on transportation. The level of impact associated with this issue would be less under the No Project Alternative than the proposed project.

Tribal Cultural Resources. The No Project Alternative would not require any grading, site work, or removal of vegetation because no new development would occur on the project site. In addition, no new buildings would be constructed on the project site. As no disturbance of existing topography would occur, there is no potential for impacts to previously identified or any as-of-yet undiscovered tribal cultural materials that may exist. While the proposed project includes **Mitigation Measures TCR-1 through TCR-3**, to reduce tribal cultural resource impacts to a less than significant. The No Project Alternative would result in **no impact** to on-site tribal cultural resources. Therefore, **no impact** related to tribal cultural resources would occur under this

alternative. The level of impact associated with this issue would be less under the No Project Alternative than the proposed project.

5.4.1.2 Attainment of Project Objectives

While the No Project Alternative would eliminate the impacts associated with the proposed project, as well as those impacts determined to be **less than significant**, it would not meet any of the project objectives. Since the project site would remain undeveloped and vacant, this alternative would not: (1) meet a greater market demand for state-of-the-art light industrial buildings by replacing a vacant office building; (2) realize the City's industrial goal, policies, and programs to strengthen its economic base; (3) promote development that will attract new businesses to operate in the City; (4) encourage business development that will generate a range of employment opportunities for the community; or (5) help attract new business enterprises that will result in a positive flow of revenue to the City. As a result, this alternative would not meet the objectives of the proposed project.

5.4.2 Alternative 2: Reduced Footprint Alternative

The following provides a description of the Reduced Footprint Alternative and its anticipated environmental impacts. The purpose of the Reduced Footprint Alternative is to reduce the proposed light industrial square footage and facility footprint, which are the primary sources of project-related air quality, greenhouse gas, and transportation impacts.

The emphasis of the analysis is on comparing the anticipated environmental impacts of the Reduced Footprint Alternative to the environmental impacts associated with the proposed project. The discussion includes a determination of whether or not the Reduced Footprint Alternative would reduce, eliminate, or create new significant environmental impacts and would or would not meet the objectives of the proposed project.

The potential impacts associated with the Reduced Footprint Alternative are described below. As discussed, the Reduced Footprint Alternative would develop the same use as the proposed project on the same project site. As such, it can be assumed that construction methods, equipment, and activities would be similar for both the proposed project and this alternative. It can also be assumed that alterations to topography and vegetation on the site would be similar for both developments. The same regulations, ordinances, standards, and policies applicable to the proposed project would also be applicable to this alternative.

5.4.2.1 Environmental Analysis

Air Quality. The Reduced Footprint Alternative would develop a reduced size light industrial building on the same site as the proposed project. It is assumed that the proposed landscaping, surface parking, and utility improvements identified for the proposed project would remain the same under the Reduced Footprint and construction activities for the proposed project, and this alternative would be similar. However, due to the reduced development under this alternative, this alternative may result in reduced construction and operational emissions, including those due to vehicle trips and stationary equipment, compared to those under the proposed project.

The Reduced Footprint Alternative would result in an approximately 33 percent reduction in development, which would proportionally correlate with a reduction in the number of pollutants emitted during construction and operation of this alternative. As described in Section 4.1, Air Quality, of the EIR, the South Coast Air Basin (SCAB) is currently designated nonattainment for the federal and State standards for ozone (O_3), particulate matter 2.5 microns and less ($PM_{2.5}$), and particulate matter 10 microns in diameter and less (PM_{10}). Consistent with the proposed project, construction of the Reduced Footprint Alternative would not exceed the South Coast Air Quality Management District's (SCAQMD) thresholds, and impacts would **be less than significant**. No mitigation measures are required.

Operation of the Reduced Footprint Alternative would not exceed the significance criteria for daily volatile organic compounds (VOCs), carbon monoxide (CO), sulfur oxides (SO_X), PM_{10}, and $PM_{2.5}$ emissions. The Reduced Footprint Alternative would reduce the number of pollutants emitted during operation. Therefore, operation of the Reduced Footprint Alternative would result in a l**ess than significant impact** related to a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard.

Consistent with the proposed project, the Reduced Footprint Alternative would result in **less than significant** impacts related to CO hot spots, odors, and health risk impacts during operation, and no mitigation measures are required.

All air quality impacts would be reduced compared to those of the proposed project and would be **less than significant.**

Cultural Resources. The Reduced Footprint Alternative would develop the same site as the proposed project and would result in similar alterations to the project site topography. Although the Reduced Footprint Alternative could result in a reduced construction footprint on the site, similar to the proposed project, this alternative would still involve construction on the project site that could potentially disturb previously unknown historical and archaeological resources and human remains, and result in significant impacts. As such, **Mitigation Measure CUL-1** and **Regulatory Compliance Measure CUL-1** would also be required for this alternative to reduce the impacts to less than significant levels. Therefore, under this alternative, potential impacts to cultural resources would be **less than significant with mitigation incorporated.** The level of impact associated with this issue would be similar under the Reduced Footprint Alternative to the proposed project.

Energy. Implementation of the Reduced Footprint Alternative assumes that the eastern portion of the project site would be developed with one light industrial building totaling 127,596 square feet. This represents a reduction in development of 63,798 square feet, or approximately 33 percent, compared to the proposed project. Therefore, implementation of this alternative would result in lower energy demand during construction and operation compared to the proposed project because of the reduced construction activity and level of development. Consistent with the proposed project, this alternative would be required to implement **Regulatory Compliance Measure EN-1** to reduce truck idling times. Therefore, the Reduced Footprint Alternative would result in a **less than significant impact** to the wasteful, inefficient, or unnecessary consumption of

fuel or energy during construction and operation and would incorporate renewable energy or energy efficiency measures into building design, equipment uses, and transportation. Therefore, this alternative would result in a **less than significant impact** related to energy resources. The level of impact associated with this issue would be less under the Reduced Footprint Alternative than the proposed project.

Geology and Soils. The Reduced Footprint Alternative would develop the same site as the proposed project and, therefore, would result in the same potential impacts related to geology and soils and seismic hazards as the proposed project. Consistent with the proposed project, compliance with Seismic and Building Standards in the Building Code as specified in **Regulatory Compliance Measure GEO-1** would be required as a condition under this alternative. Additionally, implementation of **Mitigation Measure GEO-1**, which would require the construction contractor to comply with the recommendations in the Geotechnical Evaluation to reduce the proposed project's impact related to liquefaction would reduce impacts related to liquefaction to less than significant. Therefore, with implementation **Regulatory Compliance Measure GEO-1** and **Mitigation Measure GEO-**, impacts resulting from strong seismic ground shaking, seismic-related ground failure, liquefaction, landslide, unstable slopes, expansive soils, and soil collapse would be **less than significant with mitigation incorporated.**

The Reduced Footprint Alternative would involve the same construction activities on the project site that could impact previously unknown unique paleontological resources or unique geologic features, as the proposed project. As such, implementation of **Mitigation Measure GEO-2** would be required to reduce potential impacts to less than significant levels. Therefore, impacts related to geology and soils under this alternative would be **less than significant with mitigation incorporated.** The level of impact associated with this issue would be similar under the Reduced Footprint Alternative to the proposed project.

Greenhouse Gas Emissions. Implementation of the Reduced Footprint Alternative would result in a reduction in development of 63,798 square feet, or approximately 33 percent, compared to the proposed project. Therefore, implementation of this alternative would result in lower energy demand during construction compared to the proposed project because of the reduction in development. This alternative would also result in reduced emissions from all operational greenhouse gas sources because the emissions from each source would vary in direct proportion to the building size. Total net annual operational emissions (which include energy, mobile, solid waste, and water consumption sources) for this alternative are assumed to be less than the proposed project. Therefore, the Reduced Footprint Alternative would have lower greenhouse gas emission impacts than the proposed project. Greenhouse gas emissions under this alternative, similar to the proposed project, would not exceed the 3,000 metric tons of carbon dioxide equivalent per year (MT CO_2e/year) threshold of significance. Therefore, this alternative would result in a **less than significant impact** related to greenhouse gas emissions. The level of impact associated with this issue would be less under the Reduced Footprint Alternative than the proposed project.

Noise. Construction activities under the Reduced Footprint Alternative would involve the use of generally the same types of construction equipment and vehicles as the proposed project; however, construction activities would take place at further distances from the nearest receptors

as under the proposed project. As a result, the daily construction noise levels generated under this alternative would be less than that generated by the construction of the proposed project. Consistent with the proposed project, **Regulatory Compliance Measure NOI-1** would still be required. Under this alternative deep dynamic compaction activities would occur at further distances from the nearby sensitive receptors and the potential for building damage would be less than the proposed project. Consistent with the proposed project, **Mitigation Measure NOI-1** would still be required to reduce the potential for vibration damage to a less than significant impact. However, due to the reduced project footprint under this alternative, the duration of construction would be reduced, the duration of exposure to noise and vibration impacts would be shorter, and the noise and vibration impacts to nearby receptors would be reduced. Therefore, impacts related to vibration under this alternative, would be **less than significant with mitigation incorporated**. The level of impact associated with this issue would be less under the Reduced Footprint Alternative than the proposed project.

Transportation. The Reduced Footprint Alternative would develop a smaller light industrial building (127,596 square feet, which is 63,798 square feet less than the proposed project) on the same site as the proposed project. It is assumed that the proposed landscaping, surface parking, and utility improvements identified for the proposed project would remain the same under the Reduced Footprint Alternative and construction activities for the proposed project and would be constructed consistent with City standards and regulations. The Reduced Footprint Alternative would result in less of an increase in vehicle trips to and from the project site because the number of trucks accessing the project site would be reduced by 33 percent. Under this alternative, all study area intersections would continue to operate at satisfactory LOS during both peak hours.

Consistent with the proposed project, the Reduced Footprint Alternative would result in **less than significant impacts** concerning conflicts with applicable programs, plans, ordinances, or policies addressing the circulation system, inconsistencies with CEQA Guidelines §15064.3, subdivision (b), and inadequate emergency access. Consistent the proposed project, the Reduced Footprint Alternative would require the implementation of **Mitigation Measure TRA-1**, which involves the installation of on-site traffic signing and striping to direct heavy trucks to the driveway on Douglas Drive. Impacts related to hazards due to a geometric design feature under this alternative would result in a **less than significant impact with mitigation incorporated.** The level of impact associated with this issue would be less under the Reduced Footprint Alternative than the proposed project.

Tribal Cultural Resources. The Reduced Footprint Alternative would develop the same site as the proposed project and would result in similar alterations to the project site topography. Due to the reduced project size proposed under this alternative, this alternative could result in a reduced construction footprint. However, construction of this alternative would still result in ground-disturbing activities that could impact previously unknown tribal cultural resources. Consistent with the proposed project, this alternative would be required to implement **Mitigation Measure CUL-1** and **Regulatory Compliance Measure CUL-1**, to reduce potentially significant impacts to unknown tribal cultural resources and the discovery of human remains, including those determined to be of Native American descent, to a less than significant level. Additionally, the Reduced Footprint Alternative would be required to implement **Mitigation Measures TCR-1 through TCR-3** to reduce potential impacts related to unknown buried tribal cultural resources to

a less than significant level. Therefore, impacts related to Tribal Cultural Resources under this alternative would be **less than significant with mitigation incorporated.** The level of impact associated with this issue would be similar under the Reduced Footprint Alternative than the proposed project.

5.4.2.2 Attainment of Project Objectives

As discussed above, the Reduced Footprint Alternative would develop a smaller light industrial building (127,596 square feet, which is 63,798 square feet less than the proposed project) on the same site as the proposed project. The Reduced Footprint Alternative would fulfill project objectives by constructing a light industrial facility that would provide (1) a greater market demand for state-of-the-art light industrial buildings by replacing a vacant office building; realize the City's industrial goal, policies, and programs to strengthen its economic base; (2) promote development that will attract new businesses to operate in the City; (3) encourage business development that will generate a range of employment opportunities for the community; and (4) help attract new business enterprises that will result in a positive flow of revenue to the City. However, due to the reduced development proposed under this alternative, it would not provide the same capacity or employment opportunities as the proposed project. As such, this alternative would only partially meet project objectives.

5.4.3 Alternative 3: No Refrigeration Warehouse Alternative

The following provides a description of the No Refrigeration Warehouse Alternative and its anticipated environmental impacts. The purpose of the No Refrigeration Warehouse Alternative is to eliminate cold storage space in the proposed light industrial building and truck refrigeration units, which are the primary source of project-related operational air quality impacts and greenhouse gas emissions.

The emphasis of the analysis is on comparing the anticipated environmental impacts of the No Refrigeration Warehouse Alternative to the environmental impacts associated with the proposed project. The discussion includes a determination of whether or not the No Refrigeration Warehouse Alternative would reduce, eliminate, or create new significant environmental impacts and would or would not meet the objectives of the proposed project.

The potential impacts associated with the No Refrigeration Warehouse Alternative are described below. As discussed, the No Refrigeration Warehouse Alternative would develop the same use as the proposed project on the same project site. As such, it can be assumed that construction methods, equipment, and activities would be similar for both the proposed project and this alternative. It can also be assumed that alterations to topography and vegetation on the site would be similar for both developments. The same regulations, ordinances, standards, and policies applicable to the proposed project would also be applicable to this alternative.

5.4.3.1 Environmental Analysis

Air Quality. The No Refrigeration Warehouse Alternative would include the same building footprint as the proposed project, on the same site as the proposed project. It is assumed that the proposed landscaping, surface parking, and utility improvements identified for the proposed project would remain the same under the No Refrigeration Warehouse Alternative. Construction

activities for the proposed project would also remain the same. However, during operation, the No Refrigeration Warehouse Alternative would not include any refrigerated cold storage space in the light industrial building or the transport of refrigeration units by trucks accessing the project site. Consistent with the proposed project, construction of the No Refrigeration Warehouse Alternative would not exceed the SCAQMD's thresholds, and impacts would be **less than significant**.

Operation of the No Refrigeration Warehouse Alternative would not exceed the significance criteria for daily VOCs, CO, SO_X, PM_{10}, and $PM_{2.5}$ emissions The No Refrigeration Warehouse Alternative would reduce the number of pollutants emitted during operation, specifically emissions related to mobile source and energy source emissions. Therefore, consistent with the proposed project, operation of the No Refrigeration Warehouse Alternative would result in a **less than significant impact** related to a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard.

Consistent with the proposed project, the No Refrigeration Warehouse Alternative would result in a **less than significant impact** related to CO hot spots, odors, and health risk impacts during operation, and no mitigation measures are required.

Operational air quality impacts would be reduced compared to those of the proposed project and would be **less than significant**. Therefore, the level of impact associated with this issue would be less under the No Refrigeration Warehouse Alternative than the proposed project.

Cultural Resources. The No Refrigeration Warehouse Alternative would include the same building footprint as the proposed project; however, the No Refrigeration Warehouse Alternative would not include any cold storage space in the light industrial building or the transport of refrigeration units by trucks accessing the project site. The No Refrigeration Warehouse Alternative would result in the same construction footprint on the site as the proposed project. Consistent with the proposed project, construction of this alternative has the potential to impact unidentified archaeological resources during ground-disturbing activities. As such, **Mitigation Measure CUL-1** and **Regulatory Compliance Measure CUL-1** would also be required for this alternative to reduce the impacts to less than significant levels. Therefore, under this alternative, potential impacts to cultural resources would be **less than significant with mitigation incorporated.** The level of impact associated with this issue would be similar under the No Refrigeration Warehouse Alternative to the proposed project.

Energy. The No Refrigeration Warehouse Alternative would include the same building footprint as the proposed project; however, the No Refrigeration Warehouse Alternative would not include any cold storage space in the light industrial building or the transport of refrigeration units by trucks accessing the project site. The No Refrigeration Warehouse Alternative would result in the same construction activities on the site as the proposed project; however, the implementation of this alternative would result in lower energy demand during operation compared to the proposed project due to the of the elimination of cold storage and refrigerated trucks accessing the project site. Consistent with the proposed project, compliance with **Regulatory Compliance Measure EN-1,** which would reduce energy usage on the project site during construction through reducing

truck idling times, would be required under this alternative. With implementation of the regulatory compliance measure, impacts related to energy resources during project construction would be less than significant. The No Refrigeration Warehouse Alternative would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy during construction or operation and would incorporate renewable energy or energy efficiency measures into building design, equipment uses, and transportation. Therefore, this alternative would result in a **less than significant impact** to energy resources. The level of impact associated with this issue would be less under the No Refrigeration Warehouse Alternative than the proposed project.

Geology and Soils. The No Refrigeration Warehouse Alternative would develop the same site as the proposed project and therefore, would result in the same potential impacts related to geology and soils and seismic hazards. Consistent with the proposed project, compliance with Seismic and Building Standards in the Building Code as specified in **Regulatory Compliance Measure GEO-2** would be required as a condition under this alternative. Additionally, implementation of **Mitigation Measure GEO-1**, which would require the construction contractor to comply with the recommendations in the Geotechnical Evaluation to reduce the proposed project's impact related to liquefaction, would reduce impacts related to liquefaction to less than significant and this impact would be **less than significant with mitigation incorporated.** The No Refrigeration Warehouse Alternative would involve the same construction activities on the project site, as the proposed project, which could impact previously unknown unique paleontological resources or unique geologic features. As such, implementation of **Mitigation Measure GEO-2** would be required to reduce potential impacts to less than significant levels and this impact would be **less than significant with mitigation incorporated**. The level of impact associated with this issue would be similar under the No Refrigeration Warehouse Alternative than the proposed project.

Greenhouse Gas Emissions. The No Refrigeration Warehouse Alternative would include the same building footprint as the proposed project; however, the No Refrigeration Warehouse Alternative would not include any cold storage in the light industrial building or the transport of refrigeration units by trucks accessing the project site. The No Refrigeration Warehouse Alternative would result in the same demolition and construction activities and would produce similar greenhouse gas emissions as the proposed project. Under this alternative, operational emissions associated with mobile-source emissions, and energy consumption would be reduced; however, area sources emissions (e.g., maintenance activities and landscaping), waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution) emissions would be similar to the proposed project. Therefore, this alternative would result in a **less than significant impact** to greenhouse gas emissions. The level of impact associated with this issue would be less under the No Refrigeration Warehouse Alternative than the proposed project.

Noise. Construction activities under the No Refrigeration Warehouse Alternative would involve the use of the same types of construction equipment and vehicles as the proposed project, and construction activities would take place at the same distances from the nearest receptors as under the proposed project. As a result, the daily construction noise levels generated under this alternative would be comparable to those generated by the construction of the proposed project, and compliance with **Regulatory Compliance Measure NOI-1** would still be required; this alternative would also result in similar vibration impacts at the nearby sensitive receptors and **Mitigation Measure NOI-1** would still be required to reduce the potential for vibration damage to

a less than significant impact. Under this alternative vibration impacts would be **less than significant with mitigation incorporated.**

Operation of the No Refrigeration Warehouse Alternative has the potential to reduce operational noise as this alternative would not include cold storage fan units. Under the proposed project, these cold storage fan units would operate 24 hours per day and generate a noise level of 57.5 A-weighted decibel equivalent continuous sound level (dBA L_{eq}) at 60 feet. Under the No Refrigeration Warehouse Alternative, it is assumed that the elimination of cold storage would also eliminate the need for cold storage fan units within the warehouse, reducing operational noise compared to the proposed project. Therefore, impacts related to **operational noise** under this alternative, would be **reduced when compared** to the proposed project. The level of impact associated with this issue would be **less** under the No Refrigeration Warehouse than the proposed project.

Transportation. The No Refrigeration Warehouse Alternative would include the same building footprint as the proposed project; however, the No Refrigeration Warehouse Alternative would not include any cold storage space in the light industrial building or the transport of refrigeration units by trucks accessing the project site. The No Refrigeration Warehouse Alternative would result in the same construction activities on the site as the proposed project; however, implementation of this alternative would eliminate cold storage in the proposed warehouse space and would eliminate all refrigerated trucks, reducing the number of daily truck trips. Under this alternative, all study area intersections would continue to operate at satisfactory LOS during both peak hours.

Consistent with the proposed project, the No Refrigeration Warehouse Alternative would result in **less than significant impacts** concerning conflicts with applicable programs, plans, ordinances, or policies addressing the circulation system, inconsistencies with CEQA Guidelines §15064.3, subdivision (b), and inadequate emergency access. Consistent the proposed project, the No Refrigeration Warehouse Alternative would require the implementation of **Mitigation Measure TRA-1**, which involves the installation of on-site traffic signing and striping to direct heavy trucks to the driveway on Douglas Drive. Impacts related to hazards due to a geometric design feature under this alternative would result in a **less than significant impact with mitigation incorporated.** The level of impact associated with this issue would be less under the No Refrigeration Warehouse Alternative than the proposed project.

Tribal Cultural Resources. The No Refrigeration Warehouse Alternative would include the same building footprint as the proposed project, would develop the same site as the proposed project and would result in similar alterations to the project site topography. Construction of this alternative would still result in ground-disturbing activities that could impact previously unknown tribal cultural resources. Consistent with the proposed project, the No Refrigeration Warehouse Alternative would be required to implement Mitigation **Measure CUL-1 and Regulatory Compliance Measure CUL-1**, to reduce potentially significant impacts to unknown tribal cultural resources and the discovery of human remains, including those determined to be of Native American descent, to a less than significant level. Additionally, the No Refrigeration Warehouse Alternative would be required to the implement **Mitigation Measures TCR-1 through TCR-3** to reduce potential impacts related to unknown buried tribal cultural resources to a less than

significant level. Therefore, impacts related to Tribal Cultural Resources under this alternative would be **less than significant with mitigation incorporated.** The level of impact associated with this issue would be similar under the No Refrigeration Warehouse to the proposed project.

5.4.3.2 Attainment of Project Objectives

As discussed above, the No Refrigeration Warehouse Alternative would include the same building footprint as the proposed project; however, the No Refrigeration Warehouse Alternative would not include any cold storage space in the light industrial building or the transport of refrigeration units by trucks accessing the project site. While the No Refrigeration Warehouse Alternative would reduce the operational emissions of criteria pollutants, operational greenhouse gas emissions, operational energy consumption, and stationary noise levels, when compared with the proposed project, this alternative would not totally fulfill Project Objectives 2 and 4, as warehouse projects without cold storage would by definition exclude certain users and generally not be as competitive as warehouses with cold storage. As such, this alternative would only partially meet project objectives.

5.4.1 Alternative 4: Deep Dynamic Compaction and Stone Columns

The following provides a description of the Deep Dynamic Compaction and Stone Columns Alternative and its anticipated environmental impacts. The purpose of the Deep Dynamic Compaction and Stone Columns Alternative is to reduce vibratory impacts to sensitive receptors within the vicinity of the proposed project.

The emphasis of the analysis is on comparing the anticipated environmental impacts of the Deep Dynamic Compaction and Stone Columns Alternative to the environmental impacts associated with the proposed project. The discussion includes a determination of whether or not the Deep Dynamic Compaction and Stone Columns Alternative would reduce, eliminate, or create new significant environmental impacts and would or would not meet the objectives of the proposed project.

The potential impacts associated with the Deep Dynamic Compaction and Stone Columns Alternative are described below. As discussed, the Deep Dynamic Compaction and Stone Columns Alternative would develop the same use as the proposed project on the same project site. As such, it can be assumed that construction methods, equipment, and activities would be similar for both the proposed project and this alternative. It can also be assumed that alterations to topography and vegetation on the site would be similar for both developments. The same regulations, ordinances, standards, and policies applicable to the proposed project would also be applicable to this alternative.

5.4.1.1 Environmental Analysis

Air Quality. The Deep Dynamic Compaction and Stone Columns Alternative would include the same building footprint as the proposed project and the same construction footprint. Implementation of this alternative would result in the same operational air quality impacts as the proposed project; however, the installation of stone columns alongside deep dynamic compaction would require additional construction equipment such as an auger rig and compactors. While the addition of construction equipment has the potential to increase construction emissions when

compared to the proposed project, these emissions would be short term and would not represent a significant increase when compared to the proposed project. Therefore, under the Deep Dynamic Compaction and Stone Columns Alternative, project construction would not exceed the SCAQMD's thresholds, and impacts would be **less than significant.**

Operation of the Deep Dynamic Compaction and Stone Columns Alternative would not exceed the significance criteria for daily VOCs, CO, SO_X, PM_{10}, and $PM_{2.5}$ emissions. The Deep Dynamic Compaction and Stone Columns Alternative would include the same operational impacts as the proposed project and would result in a **less than significant impact** related to a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard.

Consistent with the proposed project, the Deep Dynamic Compaction and Stone Columns Alternative would result in a **less than significant impact** related to CO hot spots, odors, and health risk impacts during operation, and no mitigation measures are required.

Construction emissions under this alternative may result in a negligible increase compared to those of the proposed project. Therefore, the level of impact associated with this issue would be similar under the Deep Dynamic Compaction and Stone Columns Alternative to the proposed project.

Cultural Resources. The Deep Dynamic Compaction and Stone Columns Alternative would include the same building footprint as the proposed project and would develop the same site as the proposed project; however, under this alternative, both deep dynamic compaction and stone columns would be used during construction. Construction activities associated with stone columns would involve the use of augers at shallow-to-medium depths below the ground surface for the drilling of the initial cavities for the installation of stone columns. Under the proposed project, only deep dynamic compaction would be used, and these activities would not include excavation; however, the vibration impacts caused by this activity would likely impact buried archaeological resources, if present. Therefore, consistent with the proposed project, construction using the Deep Dynamic Compaction and Stone Columns Alternative has the potential to impact unidentified archaeological resources during ground-disturbing activities. Implementation of **Mitigation Measure CUL-1** would be required under this alternative to reduce potential impacts to unknown archaeological resources to a less than significant level. Additionally, adherence to **Regulatory Compliance Measure CUL-1** would be required as part of this alternative to ensure that the project has minimal impacts related to unknown buried human remains. Therefore, the level of impact associated with this issue would be similar under the Deep Dynamic Compaction and Stone Columns Alternative to the proposed project.

Energy. Implementation of the Deep Dynamic Compaction and Stone Columns Alternative would include the same building footprint as the proposed project; however, the Deep Dynamic Compaction and Stone Columns Alternative would involve both deep dynamic compaction activities and the installation of stone columns to mitigate the soils liquefaction potential. Under this alternative, impacts to energy during construction would be similar to that of the proposed project. Consistent with the proposed project, this alternative would be required to implement **Regulatory Compliance Measure EN-1** to reduce truck idling times. Therefore, the Deep Dynamic

Compaction and Stone Columns Alternative would result in a **less than significant impact** to the wasteful, inefficient, or unnecessary consumption of fuel or energy during construction and operation and would incorporate renewable energy or energy efficiency measures into building design, equipment uses, and transportation. Therefore, this alternative would result in a **less than significant impact** related to energy resources. The level of impact associated with this issue would be similar under the Deep Dynamic Compaction and Stone Columns Alternative to the proposed project.

Geology and Soils. The Deep Dynamic Compaction and Stone Columns Alternative would develop the same site as the proposed project and, therefore, would result in similar potential impacts related to geology and soils and seismic hazards as the proposed project. Consistent with the proposed project, compliance with Seismic and Building Standards in the Building Code as specified in **Regulatory Compliance Measure GEO-1** would be required as a condition under this alternative. Additionally, implementation of **Mitigation Measure GEO-1**, which would require the construction contractor to comply with the recommendations in the Geotechnical Evaluation to reduce the proposed project's impact related to liquefaction, would reduce impacts related to liquefaction to less than significant. Therefore, with implementation of the regulatory compliance measure and mitigation measure, impacts resulting from strong seismic ground shaking, seismic-related ground failure, liquefaction, landslide, unstable slopes, expansive soils, and soil collapse would be **less than significant with mitigation incorporated.**

The Deep Dynamic Compaction and Stone Columns Alternative would involve the use of augers at shallow-to-medium depths below the ground surface for drilling of the initial cavities for the installation of stone columns. Under the proposed project, only deep dynamic compaction would be used and these activities would not include excavation; however, the vibration impacts caused by this activity would likely impact buried paleontological resources or unique geologic features, if present. Therefore, consistent with the proposed project, construction using the Deep Dynamic Compaction and Stone Columns Alternative has the potential to impact paleontological resources or unique geologic features during ground-disturbing activities. As such, implementation of **Mitigation Measure GEO-2** would be required to reduce potential impacts to less than significant levels. Therefore, impacts related to geology and soils under this alternative would be **less than significant with mitigation incorporated.** The level of impact associated with this issue would be similar under the Deep Dynamic Compaction and Stone Columns Alternative to the proposed project.

Greenhouse Gas Emissions. The Deep Dynamic Compaction and Stone Columns Alternative would include the same building footprint as the proposed project and the same construction footprint. Implementation of this alternative would result in similar construction and operational greenhouse gas emissions, including those due to mobile sources (e.g., cars and trucks), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, waste sources (landfilling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). Therefore, impacts related to greenhouse gas emissions would be **less than significant** under this alternative. The level of impact associated with this issue would be similar under the Deep Dynamic Compaction and Stone Columns Alternative to the proposed project.

Noise. The Deep Dynamic Compaction and Stone Columns Alternative would develop the same site as the proposed project and would involve similar construction activities including demolition, grading, site preparation, building construction, architectural coating, and paving activities; however, under this alternative both deep dynamic compaction and stone columns would be utilized for soil stabilization. This alternative would only utilize deep dynamic compaction within the central portion of the project site, while stone columns would be installed around the periphery of the project site. Under this alternative, it is assumed the deep dynamic compaction activities would not be implemented within 80 feet of the nearest buildings to reduce potential building damage and vibration impacts. While this alternative may generate short-term noise and vibration impacts from associated equipment, compliance with **Regulatory Compliance Measure NOI-1** would reduce construction noise and vibration, and impacts would be **less than significant.**

Operational activities under the Deep Dynamic Compaction and Stone Columns Alternative would involve the same operational activities and generate the noise impacts from project operations as the proposed project. Consistent with the proposed project, under this alternative, noise and vibration impacts would be **less than significant.**

Transportation. The Deep Dynamic Compaction and Stone Columns Alternative would include the same building footprint as the proposed project and would result in generally similar construction activities on the site as the proposed project with generally similar trip generation characteristics. Similar to the proposed project, all study area intersections would continue to operate at satisfactory LOS during both peak hours under the Deep Dynamic Compaction and Stone Columns Alternative.

Consistent with the proposed project, the Deep Dynamic Compaction and Stone Columns Alternative would result in a **less than significant impact** concerning conflicts with applicable programs, plans, ordinances, or policies addressing the circulation system, inconsistencies with CEQA Guidelines §15064.3, subdivision (b), and inadequate emergency access. Consistent with the proposed project, the Deep Dynamic Compaction and Stone Columns Alternative would require the implementation of **Mitigation Measure TRA-1**, which involves the installation of on-site traffic signing and striping. Impacts related to hazards due to a geometric design feature under this alternative would result in a **less than significant impact with mitigation incorporated**. The level of impact associated with this issue would be similar under the Deep Dynamic Compaction and Stone Columns Alternative to the proposed project.

Tribal Cultural Resources. The Deep Dynamic Compaction and Stone Columns Alternative would include the same building footprint as the proposed project; and would develop the same site as the proposed project and would result in similar alterations to the project site topography. The Deep Dynamic Compaction and Stone Columns Alternative would involve the use of augers at shallow-to- medium depths below the ground surface for the drilling of the initial cavities for the installation of stone columns. Both deep dynamic compaction and stone column activities could impact previously unknown tribal cultural resources. Consistent with the proposed project, the Deep Dynamic Compaction and Stone Columns Alternative would be required to implement **Mitigation Measures TCR-1 through TCR-3** to reduce potential impacts related to unknown buried tribal cultural resources to a **less than significant leve**l. Therefore, impacts related to Tribal Cultural Resources under this alternative would be **less than significant with mitigation**

incorporated. The level of impact associated with this issue would be similar under the Deep Dynamic Compaction and Stone Columns Alternative to the proposed project.

5.4.1.2 Attainment of Project Objectives

As discussed above, the Deep Dynamic Compaction and Stone Columns Alternative would include the same building footprint as the proposed project; however, the Deep Dynamic Compaction and Stone Columns Alternative would only include the use of deep dynamic compaction activities within the central portion of the project site and would utilize stone columns around the periphery of the project site during construction. The Deep Dynamic Compaction and Stone Columns Alternative would reduce impacts to ground-borne vibration during project construction when compared with the proposed project. As a result, this alternative would fulfill all of the project objectives to the same degree as the proposed project.

5.5 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an Environmentally Superior Alternative among the proposed project and the alternatives evaluated in an EIR. State CEQA Guidelines Section 15126.6(e)(2) provides that, if the No Project Alternative is the Environmentally Superior Alternative, then the EIR shall also identify an Environmentally Superior Alternative among the other alternatives and the proposed project. The qualitative environmental effects of each alternative in relation to the proposed project are summarized in **Table 5.1**. As explained previously in Section 5.1, Introduction, of this chapter, the comparisons contained in **Table 5.1** and the subsequent discussion are provided for informational purposes only because the proposed project would not result in any significant and unavoidable impacts.

The No Project Alternative would have the least impact on the environment because it would require minimal construction, with the exception of the minor renovation of the existing buildings on the project site and would thereby avoid most of the proposed project's environmental impacts resulting from construction. However, the No Project Alternative cannot be the only Environmentally Superior Alternative. Therefore, according to Section 15126.6(e)(2) of the State CEQA Guidelines, because the No Project Alternative has been identified as the environmentally superior alternative, the EIR shall also identify the proposed project or one of the other alternatives as the Environmentally Superior Alternative.

With the exception of the No Project Alternative, the Deep Dynamic Compaction and Stone Columns Alternative is the Environmentally Superior Alternative. As shown in **Table 5.1**, Alternative 4 would reduce impacts to noise and vibration from "Less than Significant with Mitigation Incorporated" to "Less than Significant" and would have the least impact on noise and vibration compared to all other alternatives. The Deep Dynamic Compaction and Stone Columns Alternative would also meet all of the project objectives of the proposed project. Accordingly, it is determined that the Deep Dynamic Compaction and Stone Columns Alternative is the Environmentally Superior Alternative because it would meet all of the project's objectives and would result in reduced impacts to noise and vibration as compared to the proposed project.

Table 5.1: Comparison of the Environmental Impacts of the Proposed Project and Project Alternatives

Impact Area	Proposed Project Impact with Mitigation (if any)	Alternative 1: No Project Alternative	Alternative 2: Reduced Footprint Alternative	Alternative 3: No Refrigerated Warehouse Alternative	Alternative 4: Deep Dynamic Compaction and Stone Columns Alternative
Air Quality	Less than Significant	Less	Less	Less	Similar
Cultural Resources	Less than Significant[1]	Less[1]	Similar[1]	Similar [1]	Similar[1]
Energy	Less than Significant	Less	Less	Less	Similar
Geology and Soils	Less than Significant[1]	Less[1]	Similar[1]	Similar[1]	Similar[1]
Greenhouse Gas Emissions	Less than Significant	Less	Less	Less	Similar
Noise	Less than Significant[1]	Less[1]	Less[1]	Less[1]	Less
Transportation	Less than Significant	Less[1]	Less[1]	Less[1]	Similar[1]
Tribal Cultural Resources	Less than Significant[1]	Less[1]	Similar[1]	Similar[1]	Similar[1]

[1] Mitigation identified.

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6.0 OTHER CEQA CONSIDERATIONS

6.1 SUMMARY OF SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(c) of the State CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided. Specifically, Section 15126.2(c) states that an EIR shall:

> "Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described."

The Executive Summary of this document (Chapter 1.0) contains a detailed summary that identifies the proposed project's environmental impacts as compared to existing conditions, proposed mitigation measures, and the level of significance of any impacts after mitigation. Implementation of the proposed project would not result in any impacts that are considered significant, adverse, and unavoidable. All environmental issues analyzed in this Draft EIR were determined to result in less than significant impacts or can be reduced to less than significant levels with the incorporation of mitigation measures.

6.2 ENERGY IMPACTS

According to Section 15126.2(b) of the State CEQA Guidelines, "[i]f analysis of the project's energy use reveals that the project may result in significant environmental effects due to wasteful, inefficient, or unnecessary use of energy, or wasteful use of energy resources, the EIR shall mitigate that energy use."

As discussed in Section 4.3, Energy, of this Draft EIR, the proposed project would not result in significant impacts related to energy use. Energy (e.g., fuel) usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. In addition, the net increase in electricity usage attributable to the proposed project would not represent a substantial demand on available electricity resources. Furthermore, automobiles and transportation-related energy use to and from the project site would be subject to fuel economy and efficiency standards applied throughout the State and fuel efficiency is expected to increase throughout the life of the project. Therefore, implementation of the proposed project would not result in a substantial increase in transportation-related energy uses. Neither construction nor operation of the proposed project would result in the wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, no mitigation is required.

6.3 GROWTH-INDUCING IMPACTS

State CEQA Guidelines Sections 15126(d) and 15126.2(e) require that an EIR analyze growth-inducing impacts and discuss the ways in which a proposed project could foster economic or population growth or construction of additional housing, either directly or indirectly, in the surrounding environment. State CEQA Guidelines Section 15126.2(d) also requires a discussion of the characteristics of projects that may encourage and facilitate other activities that could

significantly affect the environment, either individually or cumulatively. To address these issues, potential growth-inducing effects were examined through analysis of the following questions:

- Would the project remove obstacles to, or otherwise foster, population growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development)?

- Would the project foster economic growth?

- Would approval of the project involve some characteristic that may encourage and facilitate other activities that could significantly affect the environment?

Growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment (State CEQA Guidelines Section 15126.2(e)). This issue is presented to provide additional information on ways in which the proposed project could contribute to significant changes in the environment beyond the direct consequences of developing the proposed land uses as described in earlier sections of this Draft EIR.

The area surrounding the project site is highly urbanized and developed with a variety of industrial, commercial, office, and warehouse land uses. The proposed project will require water, sewer, drainage, electricity, and natural gas lines. However, the project site is currently developed and located in a highly urbanized environment where these facilities already exist in place. It is not anticipated that the proposed project would require substantial utility infrastructure improvements.

The construction of the proposed project is anticipated to generate a number of construction-related jobs. However, as discussed in Section 4.14 of the Initial Study prepared for the proposed project (see **Appendix B)**, it is unlikely that a substantial number of employees would need to be relocated from outside the region to meet the need for employees resulting from implementation of the proposed project. In addition, the proposed project would not provide or remove housing on the project site. it is unlikely that the employment offered by the proposed project would cause people to move or relocate to the area solely for the purpose of being close to the project site. Accordingly, the proposed project would not induce either short- nor long-term population growth.

In its existing condition, the project site is developed with an underutilized five-story office building. The project site currently does not generate revenue for the City. The proposed project would provide a new source of property tax revenues to the City, thereby increasing the local tax base. Therefore, the proposed project would foster economic growth.

The proposed project includes the development of a light industrial facility. The proposed project would require an amendment to the McDonnell Specific Plan to allow light industrial uses in the eastern portion of Planning Area 1, and removal of the maximum developable area requirement while retaining the 1.0:1 FAR to maintain consistency with the General Plan. This amendment would not allow for residential uses, or add any permanent residents to the project site. Therefore, the project would not directly increase the City's population beyond existing levels. The proposed Specific Plan Amendment (SPA) would not cause a future increase in density or land use. Accordingly, the proposed project would not have any growth-inducing impacts.

6.4 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

State CEQA Guidelines Section 15126.2(d) requires an EIR to consider and discuss significant irreversible changes that would be caused by implementation of a proposed project. The State CEQA Guidelines specify that the use of nonrenewable resources during the initial and continued phases of a project should be discussed because a large commitment of such resources makes removal or non-use thereafter unlikely. Primary and secondary impacts (e.g., a highway improvement that provides access to a previously inaccessible area) should also be discussed because such changes generally commit future generations to similar uses. Irreversible damage can also result from environmental accidents associated with a project and should be discussed.

The type of development associated with the proposed project would consume limited, slowly renewable, and nonrenewable resources. This consumption would occur during construction of the proposed project and would continue throughout the proposed project's operational lifetime. The development of the proposed project would require a commitment of resources that would include (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the project site.

Construction of the proposed project would require consumption of resources that are not replenishable or that may renew so slowly as to be considered nonrenewable. These resources would include certain types of lumber and other forest products (e.g., hardwood lumber), aggregate materials used in concrete and asphalt (e.g., sand, gravel, and stone), metals (e.g., steel, copper, and lead), petrochemical construction materials (e.g., plastics), and water. Fossil fuels (e.g., gasoline and oil) would also be consumed in the use of construction vehicles and equipment. Water, which is a limited, slowly renewable resource, would also be consumed during construction of the proposed project. Furthermore, the use of construction vehicles and equipment would require the consumption of nonrenewable fossil fuels such as natural gas and oil. As with other resources consumed during construction, the consumption of nonrenewable fossil fuels for energy use would occur on a temporary basis during construction of the proposed project.

Energy use consumed by the proposed project would be associated with natural gas use, electricity consumption, and fuel used for vehicle and truck trips associated with the project. Energy resources would be used for heating and cooling buildings, transportation within the project site, and building lighting. Although there would be an overall increase in energy demand associated with the proposed project, the project would be required to adhere to all federal, State, and local requirements for energy efficiency, including current Title 24 and California Green Building Standards Code (CALGreen Code) standards that establish minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting, which would reduce energy usage. In addition, proposed new development would be constructed using energy efficient modern building materials and construction practices, and the proposed project also would use new modern appliances and equipment, in accordance with the Appliance Efficiency Regulations (Title 20, California Code of Regulations (CCR) Sections 1601 through 1608). The expected energy consumption during construction and operation of the proposed project would be consistent with typical usage rates for industrial use.

In summary, construction and operation of the proposed project would commit the use of slowly renewable and nonrenewable resources and would limit the availability of these resources on the project site for future generations or for other uses during the life of the proposed project. However, the continued use of such resources during operation would be on a relatively small scale and consistent with regional and local urban design and development goals for the area. As a result, the use of nonrenewable resources in this manner would not result in significant irreversible changes to the environment under the proposed project.

7.0 MITIGATION MONITORING AND REPORTING PROGRAM

7.1 MITIGATION MONITORING REQUIREMENTS

California Public Resources Code (PRC) Section 21081.6, which is part of the California Environmental Quality Act (CEQA) statute, mandates that the following requirements shall apply to all reporting or mitigation monitoring programs:

- The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes that have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead agency or a responsible agency, prepare and submit a proposed reporting or monitoring program.

- The lead agency shall specify the location and custodian of the documents or other materials that constitute the record of proceedings upon which its decision is based.

- The lead agency shall provide measures to mitigate or avoid potentially significant effects on the environment that are fully enforceable through permit conditions, agreements, or other measures. Conditions of project approval may be set forth in referenced documents that address required mitigation measures or, in the case of the adoption of a plan, policy, regulation, or other project, by incorporating the mitigation measures into the plan, policy, regulation, or project design.

- Prior to the close of the public review period for a draft Environmental Impact Report (EIR) or Mitigated Negative Declaration (MND), a responsible agency, or a public agency having jurisdiction over natural resources affected by the project, shall either (1) submit to the lead agency complete and detailed performance objectives for mitigation measures that would address the significant effects on the environment identified by the responsible agency or agency having jurisdiction over natural resources affected by the project, or (2) refer the lead agency to appropriate, readily available guidelines or reference documents. Any mitigation measures submitted to a lead agency by a responsible agency or an agency having jurisdiction over natural resources affected by the project shall be limited to measures that mitigate impacts to resources that are subject to the statutory authority of, and definitions applicable to, that agency. Compliance or noncompliance with that requirement by a responsible agency or agency having jurisdiction over natural resources affected by a project shall not limit the authority of the responsible agency or agency having jurisdiction over natural resources affected by a project, or the authority of the lead agency, to approve, condition, or deny projects as provided by this division or any other provision of law.

7.2 MITIGATION MONITORING PROCEDURES

The mitigation monitoring and reporting program for the proposed 5665 Plaza Drive Project (proposed project) has been prepared in compliance with PRC Section 21081.6. It describes the requirements and procedures to be followed by the City of Cypress, as the Lead Agency, to ensure that all mitigation measures adopted as part of the proposed project will be carried out as described in this Initial Study.

Table 7.A sets forth the proposed mitigation monitoring and reporting program. It lists each of the mitigation measures specified in this Initial Study and identifies the party or parties responsible for implementation and monitoring of each measure.

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
4.4: Biological Resources					
Regulatory Compliance Measure BIO-1 **Nesting Bird Survey and Avoidance.** If vegetation removal, construction, or grading activities are planned to occur within the active nesting bird season (February 1 through August 31), the City of Cypress, or designee, shall confirm that the Applicant has retained a qualified biologist who shall conduct a preconstruction nesting bird survey no more than 3 days prior to the start of such activities. The nesting bird survey shall include the work area and areas adjacent to the site (within 500 feet, as feasible) that could potentially be affected by project-related activities such as noise, vibration, increased human activity, and dust, etc. For any active nest(s) identified, the qualified biologist shall establish an appropriate buffer zone around the active nest(s). The appropriate buffer shall be determined by the qualified biologist based on species, location, and the nature of the proposed activities. Project activities shall be avoided within the buffer zone until the nest is deemed no longer active, as determined by the qualified biologist.	No more than three days prior to commencement of grading activities	Applicant and City of Cypress Community Development Director, or designee			
4.5: Cultural Resources					
Mitigation Measure CUL-1 **Unknown Archaeological Resources.** In the event that archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the Orange County List of Qualified Archaeologists has evaluated the find in accordance with federal, State, and local guidelines to determine whether the find constitutes a "unique archaeological resource," as defined in Section 21083.2(g) of the California Public Resources Code (PRC). The Applicant and its construction contractor shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the project site. Any found deposits shall be treated in accordance with federal, State and local guidelines,	During construction activities	Applicant and/or Construction Supervisor/City of Cypress Director of Community Development Department, or designee			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
including those set forth in PRC Section 21083.2. Prior to commencement of grading activities, the Director of the City of Cypress (City) Community Development Department, or designee, shall verify that all project grading and construction plans include specific requirements regarding California PRC (Section 21083.2[g]) and the treatment of archaeological resources as specified above.					
Regulatory Compliance Measure CUL-1 **Human Remains.** In the event that human remains are encountered on the project site, work within 50 feet of the discovery shall be redirected and the County Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the City of Cypress shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Prior to the issuance of grading permits, the Director of the City of Cypress Community Development Department, or designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.	During construction activities	Construction Supervisor/Applicant			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
4.6: Energy					
Regulatory Compliance Measure EN-1 Limit Idling Time. The Applicant and construction contractor would be required to comply with applicable idling regulations for on-road vehicles during project construction and operation, which require truck drivers to turn off their engines within 5 minutes of idling.	Prior to issuance of a building permit	Applicant and City of Cypress Community Development Director, or designee			
4.7: Geology and Soils					
Regulatory Compliance Measure GEO-1 **Compliance with Seismic and Building Standards in the Building Code.** Prior to issuance of the first building permit for the proposed buildings, the City of Cypress (City) Engineer, Building Official, or their designee, and the project soils engineer shall review the building plans to verify that the structural design conforms to the requirements of the City's latest adopted edition of the California Building Standards Code. Structures and walls shall be designed in accordance with applicable sections of the City's Building Code.	Prior to issuance of building permits	Applicant and City of Cypress Engineer, Building official, or designee			
Mitigation Measure GEO-1 **Implementation of Geotechnical Evaluation Recommendations.** The Applicant's construction contractor shall implement the recommendations of the Geotechnical Evaluation prepared for the proposed project, as applicable, to the satisfaction of the City of Cypress' (City) Building Official, or designee. The City's Building Official, or designee, shall confirm recommendations have been implemented into the design and construction of the proposed project prior to the issuance of a building permit.	Prior to issuance of building permits	Applicant and City of Cypress Building official, or designee			
Mitigation Measure GEO-2 **Procedures for Unexpected Paleontological Resources Discoveries.** In the event that paleontological resources are encountered, work in the immediate area of the discovery shall be halted and the Applicant shall retain a professional Paleontologist	During ground-disturbing activities	Applicant and/or Construction Supervisor/City of Cypress Director of Community Development			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
who meets the qualifications established by the Society of Vertebrate Paleontology to assess the discovery. The qualified, professional Paleontologist shall make recommendations regarding the treatment and disposition of the discovered resources, as well as the need for subsequent paleontological mitigation, which may include, but not be limited to, paleontological monitoring, collection of observed resources, preservation, stabilization and identification of collected resources, curation of resources into a museum repository, and preparation of a monitoring report of findings. The City of Cypress shall ensure that the recommendations from the qualified, professional Paleontologist shall be followed by the Applicant.		Department, or designee			
4.10: Hydrology and Water Quality					
Regulatory Compliance Measure HYD-1 Construction General Permit. Prior to commencement of construction activities, the Applicant shall obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), NPDES No. CAS000002, Order No. 2022-0057-DWQ, National Pollutant Discharge Elimination System (NPDES) No. CAS000002. This shall include submission of Permit Registration Documents (PRDs), including permit application fees, a Notice of Intent (NOI), a risk assessment, a site plan, a Stormwater Pollution Prevention Plan (SWPPP), a signed certification statement, and any other compliance-related documents required by the permit, to the State Water Resources Control Board via the Stormwater Multiple Application and Report Tracking System (SMARTS). Construction activities shall not commence until a Waste Discharge Identification Number (WDID) is obtained for the project from the SMARTS and provided to the Director of the City of Cypress Community Development Department, or designee, to demonstrate that coverage under the Construction General Permit has been obtained. Project	Prior to commencement of construction activities	Applicant and/or Construction Supervisor/City of Cypress Director of Community Development Department, or designee			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
construction shall comply with all applicable requirements specified in the Construction General Permit, including, but not limited to, preparation of a SWPPP and implementation of construction site best management practices (BMPs) to address all construction-related activities, equipment, and materials that have the potential to impact water quality for the appropriate risk level identified for the project. The SWPPP shall identify the sources of pollutants that may affect the quality of stormwater and shall include BMPs (e.g., Sediment Control, Erosion Control, and Good Housekeeping BMPs) to control the pollutants in stormwater runoff. Construction Site BMPs shall also conform to the requirements specified in the latest edition of the Orange County Stormwater Program Construction Runoff Guidance Manual for Contractors, Project Owners, and Developers to control and minimize the impacts of construction and construction-related activities, materials, and pollutants on the watershed. Upon completion of construction activities and stabilization of the project site, a Notice of Termination shall be submitted via SMARTS.					
Regulatory Compliance Measure HYD-2 If groundwater dewatering is required during construction or excavation activities and the dewatered groundwater is discharged to the sanitary sewer system, the Applicant shall obtain a discharge permit from the Director of the City of Cypress Public Works Department. If the dewatered groundwater is discharged to the storm drain system, the Applicant shall obtain coverage under the *General Waste Discharge Requirements for Discharges to Surface Waters that Pose an Insignificant (De Minimis) Threat to Water Quality (*Order No. R8-2020-0006, NPDES No. CAG998001), which covers discharges to surface waters that pose an insignificant (de minimis) threat to water quality within. This shall include submission of a Notice of Intent for coverage under the permit to the RWQCB at least 45 days prior to the start of dewatering. The Applicant shall provide the	Prior to commencement of construction activities	Applicant and/or Construction Supervisor/City of Cypress Director of Public Works, or designee			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
Waste Discharge Identification Number (WDID) to the Director of the City's Public Works Department, or designee, to demonstrate proof of coverage under the *De Minimis* Permit. Groundwater dewatering shall not be initiated until a WDID is received from the Santa Ana Regional Water Quality Control Board (RWQCB) and is provided to the Director of the City's Public Works Department, or designee. Groundwater dewatering activities shall comply with all applicable provisions in the permit, including water sampling, analysis, treatment (if required), and reporting of dewatering-related discharges. Upon completion of groundwater dewatering activities, a Notice of Termination shall be submitted to the Santa Ana RWQCB.					
Regulatory Compliance Measure HYD-3 **Water Quality Management Plan.** Prior to the issuance of grading or building permits, the Applicant shall submit a Final Water Quality Management Plan (WQMP) to the City of Cypress Engineer, or designee, for review and approval in compliance with the requirements of the *Waste Discharge Requirements for the County of Orange, Orange County Flood Control District, and the Incorporated Cities of Orange County within the Santa Ana Region Areawide Urban Storm Water Runoff Orange County (Order No. R8-2009-0030, NPDES No. CAS618030, as amended by Order No. R8-2010-0062) (North Orange County MS4 Permit)*. The Final WQMP shall be prepared consistent with the requirements of the *Technical Guidance Document for Water Quality Management Plans* (December 2013) and the Water Quality Management Plan template, or subsequent guidance manuals. The Final WQMP shall specify the BMPs to be incorporated into the project design to target pollutants of concern in runoff from the project site. The City shall ensure that the BMPs specified in the Final WQMP are incorporated into the final project design.	Prior to issuance of grading or building permits	Applicant and City of Cypress Engineer, or designee			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
Regulatory Compliance Measure HYD-4 Final Hydrology and Hydraulic Analysis. The Applicant shall submit a Final Hydrology Study to the City of Cypress Director of Public Works, or his/her designee, for review and approval prior to issuance of grading and building permits. The Final Hydrology Study shall be prepared consistent with the requirements of the *Orange County Hydrology Manual* (Orange County Environment Agency 1986) and *Orange County Hydrology Manual Addendum No. 1* (Orange County Environment Agency 1996), or subsequent guidance manuals. The Final Hydrology Study shall demonstrate that the on-site drainage facilities and post-project Best Management Practices (BMPs) (e.g., Modular Wetland Systems) are designed in compliance with the requirements of the *Waste Discharge Requirements for the County of Orange, Orange County Flood Control District, and the Incorporated Cities of Orange County within the Santa Ana Region Areawide Urban Storm Water Runoff Orange County (Order No. R8-2009-0030, NPDES No. CAS618030, as amended by Order No. R8-2010-0062) (North Orange County MS4 Permit)*. The Final Hydrology Study shall also demonstrate that the on-site drainage facilities and post-construction BMPs are adequately sized to accommodate stormwater runoff from the design storm so that post-development peak flow rates for the 10-year 24-hour frequency storm, 25-year 24-hour frequency storm, and 100-year 24-hour frequency storm does not exceed the pre-development flow rate. The City Director of Public Works, or designee, shall ensure that the drainage facilities specified in the Final Hydrology Study are incorporated into the final project design.	Prior to issuance of grading or building permits	Applicant and City of Cypress Director of Public Works, or designee			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
4.13: Noise					
Regulatory Compliance Measure NOI-1 **Construction Noise and Vibration.** Prior to issuance of grading permits, the City of Cypress (City) Director of Community Development Department, or designee, shall verify that grading and construction plans include the following requirements: • Ensure that the greatest distance between noise sources and sensitive receptors during construction activities has been achieved. • Construction equipment, fixed or mobile, shall be equipped with properly operating and maintained noise mufflers consistent with manufacturers' standards. • Construction staging areas shall be located away from off-site sensitive uses during the later phases of project development. • The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the project site whenever feasible. • The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators where feasible. • A sign, legible at a distance of 50 feet, shall also be posted at the construction site perimeter. All notices and the signs shall indicate the dates and duration of ground improvement activities, as well as provide a telephone number for the "noise disturbance coordinator." • A "noise disturbance coordinator" shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures to reduce noise levels. All signs posted at the construction site shall list the telephone number for the disturbance coordinator.	Prior to issuance of grading permits	Applicant and/or Construction Supervisor/City of Cypress Director of Community Development Department, or designee			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
Mitigation Measure NOI-1 **Construction Vibration Monitoring Plan**. Due to the close proximity to surrounding structures, the City of Cypress (City) Director of Community Development, or designee, shall verify prior to issuance of demolition or grading permits, that the approved plans require that the construction contractor implement the following mitigation measures during project construction activities in the event that the use of heavy equipment is necessary within 25 feet (ft) of surrounding structures or when deep dynamic compaction (DDC) construction activity takes places within 80 ft of surrounding structures: • Notification to nearby businesses detailing the schedule and duration of DDC activities. • Structures that are located within 25 ft of heavy construction activities and within 80 ft of DDC construction activity that have the potential to be affected by ground-borne vibration shall be identified. This task shall be conducted by a qualified structural engineer as approved by the City's Director of Community Development, or designee. • The Applicant's construction contractor shall develop a vibration monitoring and construction contingency plan for approval by the City's Director of Community Development, or designee, to identify appropriate locations in the vicinity of nearby structures where monitoring would be conducted; set up a vibration monitoring schedule; define structure-specific maximum vibration limits based on building inspections; contain provisions to conduct photo, elevation, and crack surveys to document before and after construction conditions at those structures. The plan shall identify construction contingencies that would be implemented if vibration levels approach the established vibration limits at a particular location. Potential contingencies may include one or more of the following:	Prior to issuance of demolition or grading permits	Applicant and/or Construction Supervisor/City of Cypress Director of Community Development Department, or designee			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
○ Lowering the height of the compaction weight; ○ Using a lighter compaction weight; or ○ Any other alternate method that is safe and appropriate, as determined by the project geotechnical consultant, in consultation with the City's Director of Community Development (such as utilizing geopier stabilization instead of DDC). [1] • At a minimum, vibration during initial site preparation activities at the locations described above shall be monitored. The monitoring results may indicate the need for more or less intensive measurements. When vibration levels approach the applicable limits established in the vibration monitoring and construction contingency plan, construction shall be suspended and the appropriate mitigation measures identified in the construction contingency plan shall be implemented to reduce vibration levels below thresholds.					
4.17: Transportation					
Mitigation Measure TRA-1: Truck Access & Routing Plan and Truck Signage and Striping Plan. The Applicant shall submit a Truck Access and Routing Plan to accommodate the circulation of trucks on site. Additionally, the Applicant shall prepare a Signage and Striping Plan, consistent with the provisions of the California Manual on Uniform Traffic Control Devices (CA MUTCD), that directs heavy trucks to the most appropriate access point. The Public Works Director of the City of Cypress, or designee, shall review and approve the Truck Access and Routing Plan and Signage and Striping Plan and confirm they have been incorporated into the project plans prior to the issuance of a building permit.	Prior to issuance of building permits	Applicant and City of Cypress Public Works Director, or designee			

[1] Utilizing a geopier stabilization system method is estimated to result in vibration levels of 0.22 at approximately 15 feet, which would ensure that vibration from construction within 10 feet remains lower than the threshold of 0.5 in/sec PPV for building damage.

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
4.18: Tribal Cultural Resources					
Mitigation Measure TRC-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities. The project Applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation). The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/ definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground- disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project Applicant/lead agency upon written request to the Tribe. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh Nation from a designated point of contact for the project Applicant/lead agency	Prior to ground disturbing activities	Applicant and City of Cypress Engineer, or designee			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh Nation to the project Applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh Nation TCRs. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh Nation monitor and/or Kizh Nation archaeologist. The Kizh Nation will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.					
Mitigation Measure TRC-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects. Native American human remains are defined in Public Resources Code 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section	During construction activities	Applicant and/or Construction Supervisor/City of Cypress Director of Community Development Department, or designee			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
5097.98 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh Nation determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh Nation monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).) Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.					
Mitigation Measure TCR-3 Procedures for Burials and Funerary Remains. As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a	During project construction	Applicant and/or Construction Supervisor/City of Cypress Director of Community Development Department, or designee			

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
separate treatment plan shall be created. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. In the event preservation in place is not possible despite good faith efforts by the project Applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe					

Table 7.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.					

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8.0 LIST OF PREPARERS AND PERSONS CONSULTED

8.1 CITY OF CYPRESS

The following individuals from the City of Cypress were involved in the preparation of this EIR:

- Alicia Velasco, Director of Planning/Community Development

8.2 EIR PREPARERS

The following individuals were involved in the preparation of this Draft EIR. The nature of their involvement is summarized below.

8.2.1 LSA

The following individuals were involved in the preparation of this Draft EIR:

- Ryan Bensley, AICP, Principal in Charge
- Chris Jones, AICP, Project Manager
- Lynnea Palecki, Assistant, Environmental Planner
- Amy Fischer, Principal/Air Quality, Noise and Global Climate Change Specialist
- Bianca Martinez, Air Quality Specialist
- Ken Wilhelm, Principal/Transportation
- Debmalya Sinha, Principal/Transportation
- JT Stephens, Principal/Noise
- Matt Phillips, Graphics Technician
- Jason Thomas Graphics & GIS Specialist
- Mitchell Alexander, GIS Specialist
- Jessie Quigley, GIS Specialist
- Lauren Johnson, Senior Technical Editor
- Chantik Virgil, Senior Word Processor

8.3 TECHNICAL REPORT PREPARERS

The following individuals were involved in the preparation of the technical reports in support of this Draft EIR. The nature of their involvement is summarized below.

8.3.1 G3Soil Works

The following individuals were involved in the preparation of the *Geotechnical Investigation and Report Update, Proposed Goodman Commerce Center, 5665 and 5757 Plaza Drive, Cypress, California* (May 4, 2022) and the *Updated Earthwork Considerations Goodman Commerce Center Cypress Building 3, 5665 Plaza Drive Cypress, California* (August 25, 2023):

- Daniel J. Morikawa, P.E., Director of Engineering
- Steve E. Stricklen, CEO / Principal Geotechnical Engineer
- Erik C. Haaker, P.G., C.E.G. Senior Engineering Geologist

8.3.2 Stantec Consulting Services Inc.

The following individuals were involved in the preparation of the *Phase I Environmental Site Assessment – 5665 Plaza Drive Cypress, California* (September 3, 2021)*:*

- Alicia Jansen, Associate Scientist
- Brian Viggiano, PG, Senior Geologist
- Kevin Miskin, P.E. Senior Principal Engineer

8.3.3 Pacific Environmental Company

The following individuals were involved in the preparation of the *Asbestos Inspection Report 5665 Plaza Drive Cypress, California, 90630* (August 10, 2021):

- Michael Lyssy, Certified Asbestos Consultant

8.3.4 PBLA Engineering, Inc.

The following individuals were involved in the preparation of the *Water Quality Management Plan (PWQMP) GCC Cypress Building 3* (September 20, 2023):

- Steven D. Levisee, Engineer

8.3.5 Urban Crossroads

The following individuals were involved in the preparation of the Goodman Commerce Center *Traffic Impact Analysis* (November 2023):

- Aric Evatt, PTP, Principal
- Charlene So, P.E., Senior Associate

8.4 PROJECT APPLICANT/DEVELOPER

8.4.1 Goodman North America Management, LLC

The project Applicant/Developer was consulted during the preparation of this Draft EIR:

- Blair Dahl, Vice President Entitlements & Construction, Southwest Region, Goodman

8.5 PERSONS CONSULTED

8.5.1 Gabrieleño Band of Mission Indians – Kizh Nation

The following individuals were consulted during the preparation of this Draft EIR:

- Andrew Salas, Chairman

9.0 REFERENCES

SECTION 4.1: AIR QUALITY

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SECTION 4.2: CULTURAL RESOURCES

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SCOPING SUMMARY

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APPENDIX B

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FINAL

ENVIRONMENTAL IMPACT REPORT

5665 PLAZA DRIVE PROJECT

CYPRESS, CALIFORNIA

October 2024

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LIST OF ACRONYMS AND ABBREVIATIONS

°C	degrees Celsius
°F	degrees Fahrenheit
µg/m^3	micrograms per cubic meter
AAQS	ambient air quality standards
AB	Assembly Bill
ADT	average daily trips
amsl	above mean sea level
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
Basin	South Coast Air Basin
BMPs	Best Management Practices
BTU	British Thermal Units
C_2H_3Cl	vinyl chloride
C_2F_6	hexafluoromethane
CAA	(federal) Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
Cal/OSHA	California Occupational Safety and Health Administration
CalEEMod	California Emissions Estimator Model
CALGreen Code	California Green Building Standards Code
California Register	California Register of Historical Resources
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CA MUTCD	Caltrans 2014 California Manual on Uniform Traffic Control Devices
CARB	California Air Resources Board
CARB Handbook	*Air Quality and Land Use Handbook: A Community Health Perspective*
CAT	Climate Action Team
CBC	California Building Code

CBSC	California Building Standards Commission
CCAA	California Clean Air Act
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CF_4	tetrafluoromethane
CGS	California Geological Survey
CH_4	methane
CHRIS	California Historical Resources Information System
City	City of Cypress
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
COSR	Conservation/Open Space/Recreation
County	County of Orange
CPT	cone penetrometer test
CPUC	California Public Utilities Commission
dB	decibel(s)
dBA	A-weighted decibel(s)
DDC	deep dynamic compaction
du	dwelling unit
EIA	United States Energy Information Administration
EIR	Environmental Impact Report
EMFAC	EMission FACtor Model
EO	Executive Order
EQ Zapp	California Geological Survey's California Earthquake Hazards Zone Application
ESA	Environmental Site Assessment

EV	electric vehicle
FHWA	Federal Highway Administration
ft	foot/feet
FTA	Federal Transit Administration
GCC	global climate change
GHG	greenhouse gas
GWh	gigawatt-hours
GWP	global warming potential
H_2S	hydrogen sulfide
HAPs	Hazardous Air Pollutants
HBW	home-based work
HCM	*Highway Capacity Manual*
HFCs	hydrofluorocarbons
HVAC	heating ventilation and air conditioning
I-5	Interstate 5
I-605	Interstate 605
ICU	Intersection Capacity Utilization
IEPR	Integrated Energy Policy Report
IS	Initial Study
ITE	Institute of Transportation Engineers
JFTB	Joint Forces Training Base
Kizh Nation	Gabrieleño Band of Mission Indians – Kizh Nation
kWh	kilowatt hours
lbs/day	pounds per day
LCFS	Low Carbon Fuel Standard
L_{dn}	day-night average noise level
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent continuous sound level
L_{max}	maximum A-weighted sound level
LOS	level of service
LST	Localized Significance Threshold

LT	long-term measurement
Ma	million years ago
mg/m^3	milligrams per cubic meter
MLD	Most Likely Descendant
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons
MND	Mitigated Negative Declaration
MPAH	(County of Orange) Master Plan of Arterial Highways
mpg	miles per gallon
mph	miles per hour
MPO	Metropolitan Planning Organization
MS4	Municipal Separate Storm Sewer System
MT	metric tons
MT CO_2e	metric tons of carbon dioxide equivalent
MT CO_2e/yr	metric tons of carbon dioxide equivalent per year
MT/yr	metric tons per year
MW	megawatt
N_2O	nitrous oxide
N/A	not applicable
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
National Register	National Register of Historic Places
NAVD88	North American Vertical Datum of 1988
ND	no data
NHPA	National Historic Preservation Act of 1966
NHTSA	National Highway Traffic Safety Administration
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NO_X	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System

NPS	National Park Service
O_3	ozone
OCFA	Orange County Fire Authority
OCTA	Orange County Transportation Authority
OCTAM	Orange County Transportation Analysis Model
OCWD	Orange County Water District
OHP	(California) Office of Historic Preservation
OPR	(California) Governor's Office of Planning and Research
Orange County Basin	Orange County Groundwater Basin
OSHA	Occupational Safety and Health Administration
Pb	lead
PC	Planned Community
PCE	passenger car equivalents
PFCs	perfluorocarbons
PM_{10}	particulate matter less than 10 microns in diameter
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
ppb	parts per billion
ppm	parts per million
PPV	peak particle velocity
PRC	California Public Resources Code
Project Applicant	Goodman
proposed project	5665 Plaza Drive Project
RCP	Regional Comprehensive Plan
ROGs	reactive organic gases
RPS	Renewables Portfolio Standard
RTIP	Regional Transportation Improvement Program
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SAFE	Safer Affordable Fuel Efficient
SB	Senate Bill

SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SCG	Southern California Geotechnical, Inc.
SCH	State Clearing House
SCS	Sustainable Communities Strategy
sf	square foot/feet
SF_6	sulfur hexafluoride
SHMA	Seismic Hazard Mapping Act
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SLF	Sacred Lands File
SO_2	sulfur dioxide
SoCalGas	Southern California Gas
SO_X	sulfur oxides
SPA	Specific Plan Amendment
Specific Plan	McDonnell Center Amended Specific Plan
SPL	sound power levels
SR-22	State Route 22
SR-91	State Route 91
SRA	Source Receptor Area
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TAZ	traffic analysis zone
TCR	tribal cultural resources
TIA	Traffic Impact Analysis
TISG	Transportation Impact Study Guide
TRUs	Transport Refrigeration Units

TRU ACTM	Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units and TRU Generator Sets, and Facilities where TRUs Operate
UNFCCC	United Nations Framework Convention on Climate Change
USC	United States Code
USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
v/c	volume-to-capacity
VdB	vibration velocity decibels
VMT	vehicle miles traveled
VOCs	volatile organic compounds
WDID	Waste Discharge Identification Number
Working Group	GHG CEQA Significance Threshold Working Group
WQMP	Water Quality Management Plan
ZEVs	zero emission vehicles
ZNE	zero net energy

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1.0 EXECUTIVE SUMMARY

1.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that local government agencies, before taking action on projects over which they have discretionary approval authority, consider the environmental consequences of such projects. An Environmental Impact Report (EIR) is a document designed to provide to the public and to local and State governmental agency decision-makers an analysis of potential environmental consequences of a project to support informed decision-making.

This EIR has been prepared by the City of Cypress (City) to evaluate environmental impacts associated with the proposed 5665 Plaza Drive Project (proposed project); to discuss alternatives; and to propose mitigation measures that will minimize, offset, or otherwise reduce or avoid the identified potentially significant environmental impacts.

This EIR has been prepared pursuant to the requirements of CEQA (Public Resources Code (PRC) § 21000 *et seq*.) and the State CEQA Guidelines (California Code of Regulations [Cal. Code Regs.] Tit. 14 § 15000 *et seq*.). For purposes of CEQA, the City is the Lead Agency, and as such, has reviewed all submitted drafts, technical studies, and reports for consistency with applicable City regulations and policies and has commissioned the preparation of this EIR to reflect its own independent judgment.

Data for this EIR were obtained from on-site field observations; discussion with affected agencies; review of adopted plans and policies; review of available studies, reports, and data; and specialized environmental assessments prepared for the project (e.g., air quality, noise, and traffic).

The Executive Summary is intended to highlight the major areas of importance in the environmental analysis for the proposed project as required by State CEQA Guidelines Section 15123. The Executive Summary includes a brief description of the proposed project, areas of controversy known to the City, including issues raised by agencies and the public, a summary of the significant unavoidable impacts of the proposed project, and a summary of alternatives evaluated in the EIR. This Executive Summary also provides a table summarizing (1) the potential environmental impacts that would occur as a result of project implementation and operation; (2) the level of significance prior to implementation of mitigation measures; (3) regulatory compliance measures and mitigation measures that avoid or reduce the significant impacts of the proposed project, and (4) the level of significance after mitigation measures are implemented.

1.2 SUMMARY OF PROJECT DESCRIPTION

The proposed project would be located on an approximately 8.53-acre site (project site) at 5665 Plaza Drive in the City of Cypress, California. In its existing setting, the project site is developed with one five-story office building (150,626 square feet) and associated parking lot with existing light poles, and landscaping. The project site is bounded by industrial and office uses to the north, industrial uses to the west, Plaza Drive to the south, and the Goodman Commerce Center Project to the east. The Goodman Commerce Center Project, approved in April 2023, was under construction at the time of the preparation of this EIR.

The proposed project includes the demolition of an existing 150,626-square-foot five-story office building on the project site and the construction of a new 191,394-square-foot light industrial building with 181,061 square feet of warehouse space and 10,333 square feet of office space. The maximum height of the new light industrial building would be approximately 51 feet, 6 inches to the top of the parapet wall. The proposed project would provide 25 loading docks on the west side of the proposed building. The proposed project would relocate the existing driveway locations. The new westernmost driveway would be the primary truck access point and path to the truck loading docks on the proposed building's west side. Additionally, the proposed project would include a lot line adjustment to move the project site's eastern property line approximately 20 feet east, and amendments to the McDonnell Center 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.

Required discretionary actions associated with the proposed project include the following: certification of the EIR; a Specific Plan Amendment to the McDonnell Center Specific Plan to allow light industrial uses within the eastern portion of Planning Area 1, and removal of the maximum developable area requirement while retaining the 1.0:1 FAR to maintain consistency with the General Plan; and a Site plan approval.

1.3 AREAS OF CONTROVERSY

Pursuant to State CEQA Guidelines Section 15123, this EIR acknowledges the areas of controversy and issues to be resolved that are known to the City or were raised during the scoping process. On May 7, 2024, a Notice of Preparation (NOP) for the EIR was posted to the City's website and distributed by the City via the State Clearinghouse (SCH). The NOP was circulated for review from May 7 to June 5, 2024. The SCH number for this EIR is SCH No. 2020069007. In accordance with State CEQA Guidelines Section 15082, the NOP was circulated to public agencies and interested individuals and was posted at the Orange County Clerk-Recorder's Office for a period of 30 days. During the 30-day public scoping period, written comments were solicited pertaining to environmental issues/topics that this EIR should evaluate. The City held a virtual public scoping meeting on Tuesday, May 28, 2024, to present the proposed project and to solicit input from interested parties. One public comment was received during the Scoping Meeting. The issues and concerns raised in response to the NOP or at the scoping meeting are summarized as follows:

Allyssa J. Holcomb, Garrett Stiepel Ryder, LLP, on behalf of Warland Investments Company

- **Air Quality:** Concern related to excessive air pollution due to the assumption that the proposed project could foreseeably be used as a logistics center. Concern that the proposed project failed to address the impact of refrigerated trucks on air quality and did not evaluate the air quality impact of off-site effects, such as vehicle and truck trips. Concerns regarding the cumulative short and long-term impacts to air quality in surrounding areas due to the proposed project.

- **Greenhouse Gas Emissions:** Concern that proposed project emissions would exceed the South Coast Air Quality Management District (SCAQMD) greenhouse gas (GHG) emissions threshold and concern that the analysis also fails to clearly evaluate the effects of off-site GHG emissions.

- **Land Use:** Suggestion that the City should limit the scope of the EIR to current permitted land uses.

- **Noise:** Concern related to increased noise generation due to the proposed project's foreseeable use as a logistics center.

- **Traffic:** Concern related to increased traffic congestion due to the proposed project's foreseeable use as a logistics center. Concern related to the Truck Distribution Map in the Traffic Analysis for the proposed project. It was stated that the analysis failed to account for truck traffic from the combined 5665 Plaza Drive Project and Goodman Commerce Center Project. It was stated that the proposed project made the incorrect assumption that 100 percent of truck traffic would exit via Driveway 1 and omitted detailed projections for truck routes, especially regarding the impact on nearby residential areas. Concern that the Traffic Analysis inaccurately estimated daily truck trips by solely evaluating the 5665 Plaza Drive project, rather than considering the Goodman Commerce Center as a logistics hub, leading to a significant underestimation of truck traffic impacts.

City of Los Alamitos

- **Air Quality:** Suggestion that the Draft EIR include an evaluation of the proposed project's impact on air quality due to the proposed change in land use.

- **Greenhouse Gas Emissions:** Suggestion that the Draft EIR include an evaluation of the proposed project's impact on GHG emissions due to the proposed change in land use.

- **Noise:** Suggestion that the proposed project include an evaluation of the project's noise impacts due to the change in land use, proximity to sensitive noise receptors, and maximum noise levels provided in applicable General Plans, including the City of Los Alamitos General Plan.

- **Traffic:** Suggestion that the Draft EIR include the existing truck routes, the project's impact to and along the truck routes, and any impacts or needs to modify truck routes. Suggestion that the proposed project should provide a traffic and/or access analyses that evaluates the daily truck trips and their distribution and influence on Los Alamitos roadways.

Native American Heritage Commission (NAHC)

- **Tribal Cultural Resources**: Outlined the City's tribal consultation requirements under Assembly Bill 52 and Senate Bill 18.

1.4 SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the State CEQA Guidelines requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less than significant level.

1.5 ALTERNATIVES

1.5.1 Alternatives Evaluated in this EIR

PRC Section 21100 and State CEQA Guidelines Section 15126 require an EIR to identify and discuss a No Project Alternative and a reasonable range of alternatives to the proposed project that would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant environmental impacts. The following four alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic objectives of the proposed project but that may avoid or substantially lessen any of the significant impacts of the proposed project. Therefore, the alternatives considered in this EIR include the following:

- **Alternative 1 – No Project Alternative:** Consistent with State CEQA Guidelines Section 15126.6, the No Project Alternative assumes the existing land uses and condition of the project site at the time the NOP was published (May 2024) would remain unchanged. The No Project Alternative represents the environmental conditions that would exist if no new development of any kind were to occur on the project site. Under the No Project Alternative, the existing five-story office building on the project site would remain in place. The setting of the project site at the time the NOP was published is described in Chapter 4.0 of this Draft EIR with respect to individual environmental issues and forms the baseline of the impact assessment of the proposed project. While the No Project Alternative would avoid the potential impacts of the proposed project and require no mitigation measures, none of the project objectives would be achieved.

- **Alternative 2 – Reduced Footprint Alternative:** Alternative 2 would occupy the same building footprint as the proposed project and would include the construction and operation of a light-industrial building on the project site; however, Alternative 2 would reduce the project footprint by one-third (33 percent). Under this alternative, it is assumed that the light industrial building would be built out at 127,596 square feet (63,798 square feet smaller than the proposed project) and operate at a reduced capacity as compared to the proposed project. Similar to the proposed project, Alternative 2 would be located on the same approximately 8.53-acre project site, include demolition of the existing 150,626-square-foot five-story office building, and construction of a new light industrial building, with associated landscaping, surface parking, and utility improvements. Alternative 2 would provide the same number of loading docks on the western side of the proposed building (25 docks) and the same number of parking spaces (206 parking stalls) on all sides of the new building. Similar to the proposed project, Alternative 2 would relocate the two existing driveways, providing a new westernmost driveway that would be the primary truck access point and path to the truck loading docks on the proposed building's west side, and a new eastern driveway, which would be a shared driveway with the parcel to the east.

- **Alternative 3 – No Refrigeration Warehouse Alternative:** The No Refrigeration Warehouse Alternative includes the construction and operation of a light-industrial building on the project site similar to the proposed project; however, Alternative 3 would not include any refrigerated space in the light industrial building or the access to the project site by refrigerated trucks. Similar to the proposed project, the Alternative 3 would be located on an approximately

8.53-acre site and include the demolition of the existing 150,626-square-foot five-story office building on the project site and the construction of a new 191,394-square-foot light industrial building with 181,061 square feet of warehouse space and 10,333 square feet of office space with associated landscaping, surface parking, and utility improvements. Alternative 3 would provide the same number of loading docks on the west side of the proposed building and include the same number of parking spaces on all sides of the new building. Additionally, similar to the proposed project, the No Refrigeration Warehouse Alternative would relocate two existing driveways, providing a new westernmost driveway that would be the primary truck access point and path to the truck loading docks on the proposed building's west side and a new eastern driveway, which would be a shared driveway with the parcel to the east. However, Alternative 3 would see reduced operational emissions of criteria pollutants and greenhouse gases.

- **Alternative 4: Deep Dynamic Compaction (DDC) and Stone Columns:** Alternative 4 would occupy the same building footprint as the proposed project; however, under Alternative 4, both DDC and stone columns would be utilized to reduce the liquefaction potential of project soils. DDC is a ground improvement technique that 10-ton weight that would be dropped at a height of 60 feet. Stone columns involve filling pre-augered cavities with aggregate, the aggregate is then compacted using static ground pressure combined with a high frequency, low amplitude vibratory hammer. Under Alternative 4, stone columns would be placed around the periphery of the project site, while DDC would only be implemented near the central portions of the project site to reduce vibratory impacts to nearby buildings. Like the proposed project, Alternative 4 would be located on an approximately 8.53-acre site and include the demolition of the existing 150,626-square-foot five-story office building on the project site and the construction of a new 191,394-square-foot light industrial building with 181,061 square feet of warehouse space and 10,333 square feet of office space with associated landscaping, surface parking, and utility improvements. Alternative 4 would provide the same number of loading docks on the west side of the proposed building and include the same number of parking spaces on all sides of the new building. Additionally, similar to the proposed project, Alternative 4 would relocate two existing driveways, providing a new westernmost driveway that would be the primary truck access point and path to the truck loading docks on the proposed building's west side and a new eastern driveway, which would be a shared driveway with the parcel to the east.

1.5.2 Identification of the Environmentally Superior Alternative

CEQA requires the identification of an Environmentally Superior Alternative among the project and the alternatives evaluated in an EIR. State CEQA Guidelines Section 15126.6(e)(2) provides that, if the No Project/No Build Alternative is the Environmentally Superior Alternative, then the EIR shall also identify an Environmentally Superior Alternative among the other alternatives and the proposed project. Putting aside the No Project Alternative, Alternative 4 is the Environmentally Superior Alternative because this alternative would reduce impacts to noise and vibration from "Less than Significant with Mitigation Incorporated" to "Less than Significant" and would have the least impact on noise and vibration compared to all other alternatives. Alternative 4 would also meet all of the project objectives of the proposed project. Accordingly, it is determined that Alternative 4 is the Environmentally Superior Alternative because it would meet all of the project's

objectives and would result in reduced impacts to noise and vibration as compared to the proposed project.

1.6 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Table 1.1 identifies the potential project environmental impacts, proposed mitigation measures, and level of significance after mitigation is incorporated into the project. Environmental topics addressed in this EIR include Air Quality, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Noise, Transportation and Traffic, and Tribal Cultural Resources.

1.6.1 Secondary Effects of Mitigation Measures

In accordance with State CEQA Guidelines Section 15126.4(a)(1)(D), if any mitigation measure would cause one or more significant effects in addition to those that would be caused by the proposed project, the effects of the mitigation measure shall be discussed. The mitigation measures proposed (as listed on **Table 1.1**) require the Applicant/Developer to provide evidence that the project would adhere to existing programs, regulations, or recommendations in technical reports. The regulations and policies listed in the mitigation measures have been evaluated during their respective adoptions or approval processes. No secondary effects related to the proposed mitigation measures are expected to occur.

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
4.2: Air Quality		
Threshold AIR-1: Would the project conflict with or obstruct implementation of the applicable air quality plan? **Less Than Significant Impact.** The proposed project would not conflict with or obstruct implementation of the 2022 AQMP because the project's construction and operational emissions would not exceed the SCAQMD regional significance thresholds or Localized Significance Thresholds (LSTs), and the proposed project is consistent with the land use and growth intensities reflected in the adopted General Plan. Furthermore, the project would not exceed any applicable regional or local thresholds. Based on the consistency analysis provided in Section 4.1 Air Quality of the Draft EIR, the proposed project would be consistent with the regional AQMP. Therefore, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant, and no mitigation is required.	No mitigation is required.	Less Than Significant Impact.
Threshold AIR-2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard? **Less Than Significant Impact.** **Construction.** Construction emissions associated with the proposed project would not exceed the SCAQMD's thresholds for VOCs, NO_X, CO, SO_X, $PM_{2.5}$, and PM_{10}. Therefore, construction of the proposed project would not result in a cumulatively considerable increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State AAQS. Impacts would be less than significant, and no mitigation is required. **Operation.** Operational emissions associated with the proposed project would not exceed the significance criteria for daily VOCs, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State AAQS. Impacts would be less than significant, and no mitigation is required.	No mitigation is required.	Less Than Significant Impact.
Threshold AIR-3: Would the project expose sensitive receptors to substantial pollutant concentrations? **Less Than Significant Impact.** The proposed project would not result in an exceedance of a SCAQMD LST during project construction or operation. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant. Mitigation is not required.	No mitigation is required.	Less Than Significant Impact.
Threshold AIR-4: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? **Less Than Significant Impact.** **Construction** Heavy-duty equipment on the project site during construction would emit odors, primarily from equipment exhaust. In addition, the application of asphalt and architectural coatings during construction activities may result in odors. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and are thus considered less than significant. **Operation.** The proposed project would construct a light industrial building. Therefore, the proposed project does not contain land uses typically associated with emitting objectionable odors. The proposed project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed operations would be less than significant, and no mitigation is required.	No mitigation is required.	Less Than Significant Impact.
Cumulative Air Quality Impacts. **Less Than Significant Impact.** The cumulative impact area for air quality related to the proposed project is the South Coast Air Basin. Each project in the Basin is required to comply with SCAQMD rules and regulations and is subject to independent review. Per SCAQMD guidance, projects that exceed project-specific significance thresholds are considered to be cumulatively considerable. Conversely, projects that do not exceed project-specific thresholds are generally not considered to be cumulatively significant. The Basin is currently designated as a nonattainment area for the federal O_3 standard and $PM_{2.5}$ standard and as a nonattainment area for the State O_3, PM_{10}, and $PM_{2.5}$ standard. Thus, the Basin has not met the federal and State standards for these air pollutants. Future development that may take place with implementation of the project would contribute criteria pollutants to the area during project construction and operation.	No mitigation is required.	Less Than Significant Impact.

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
Air pollution is inherently a cumulative type of impact measured across an air basin. The discussion under Threshold AQ-2, above, includes an analysis of the proposed project's contribution to cumulative air impacts. As discussed above, construction emissions associated with the proposed project would not exceed the SCAQMD thresholds for VOCs, NOx, CO, SO_X, $PM_{2.5}$, or PM_{10} emissions. The proposed project's construction- and operation-related regional daily emissions are less than the SCAQMD significance thresholds for all criteria pollutants. In addition, adherence to SCAQMD rules and regulations on a project-by-project basis would substantially reduce potential impacts associated with the related projects and basin-wide air pollutant emissions. Therefore, the proposed project would not have a cumulatively considerable increase in emissions and the proposed project's cumulative air quality impacts would be less than significant.		
4.4: Cultural Resources		
Threshold CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? **No Impact.** The SCCIC record search results and field survey identified no previously recorded cultural resources on or in soils on the project site. As such, there are no historical resources as defined in State CEQA Guidelines Section 15064.5 located within the project site. The proposed project would not cause a substantial adverse change in the significance of a historical resource, and no mitigation is required.	No mitigation is required.	No Impact.
Threshold CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? **Less than Significant with Mitigation Incorporated**. According to the City of Cypress General Plan, there are no known archaeological resources located in Cypress. The project site has been previously disturbed to construct an office building and a surface parking lot. The existing office building at the project site would be demolished, materials removed or repurposed, and the entirety of the site would be graded for the construction of the proposed project. During site preparation/grading activities, there is the potential to encounter unknown cultural resources. In the event that historical or archaeological resources are encountered during grading and construction, operations shall cease and **Mitigation Measure CUL-1** would be implemented. With the implementation of **Mitigation Measure CUL-1,** project impacts to archaeological resources would be less than significant with mitigation incorporated.	**Mitigation Measure CUL-1** **Unknown Archaeological Resources.** In the event that archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the Orange County List of Qualified Archaeologists has evaluated the find in accordance with federal, State, and local guidelines to determine whether the find constitutes a "unique archaeological resource," as defined in Section 21083.2(g) of the California Public Resources Code (PRC). The Applicant and its construction contractor shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the project site. Any found deposits shall be treated in accordance with federal, State and local guidelines, including those set forth in PRC Section 21083.2, and shall be assessed, handled, and treated consistent with accepted standards, such as the Secretary of the Interior's standards and guidelines for archaeology and historic preservation. Prior to commencement of grading activities, the Director of the City of Cypress (City) Community Development Department, or designee, shall verify that all project grading and construction plans include specific requirements regarding California PRC (Section 21083.2[g]) and the treatment of archaeological resources as specified above.	Less Than Significant with Mitigation Incorporated.
Threshold CUL-3: Would the project disturb any human remains, including those interred outside of dedicated cemeteries? **Less Than Significant Impact.** Although no human remains are known to be on the project site or are anticipated to be discovered during project construction, due to ground disturbance there is a possibility of inadvertent discovery of human remains. Disturbing human remains could violate the State's Health and Safety Code as well as destroy the resource. **Regulatory Compliance Measure CUL-1** requires compliance with the State's Health and Safety Code for the treatment of human remains. Adherence to regulatory standards included in **Regulatory Compliance Measure CUL-1** would reduce the impact of the proposed project on human remains to less than significant. No mitigation is required.	**Regulatory Compliance Measure CUL-1** **Human Remains.** In the event that human remains are encountered on the project site, work within 50 feet of the discovery shall be redirected and the County Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the City of Cypress shall consult with the MLD	Less Than Significant Impact.

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
	as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Prior to the issuance of grading permits, the Director of the City of Cypress Community Development Department, or designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.	
Cumulative Cultural Resources Impacts. **Less Than Significant with Mitigation Incorporated.** Because impacts to cultural resources are typically site specific, the geographic scope of the proposed project for purposes of the cumulative impacts analysis would be the project site and the immediately surrounding area. The proposed project would have no impacts to historical resources. Therefore, when combined with the potential impacts of the past, present, and reasonably foreseeable projects identified in **Table 4.1, Summary of Cumulative Projects**, in Chapter 4.0 of this EIR, the proposed project would not contribute to cumulative impacts. The cumulative projects all likely involved or would involve some level of ground disturbance with potential for inadvertent discovery of archaeological resources or human remains. As previously discussed, the proposed project would implement **Mitigation Measure CUL-1** in the case of accidental discovery of archaeological resources and **Regulatory Compliance Measure CUL-1** in the event human remains were accidentally discovered. Compliance with these measures would reduce any impacts to these resources associated with the proposed project to less than significant. Similarly, the cumulative projects would be required to comply with applicable laws and regulations pertaining to discovery of these resources. Accordingly, any cumulative impacts would be less than significant.	Refer to **Regulatory Compliance Measure CUL-1** and **Mitigation Measure CUL-1**, provided under **Thresholds CUL-2** and **CUL-3** above.	Less Than Significant with Mitigation Incorporated.
4.5: Energy		
Threshold ENG-1: Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? **Less Than Significant Impact.** **Construction.** Construction activities are not anticipated to result in an inefficient use of energy because gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the proposed project. Energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. Construction activities would comply with all existing regulations, as required through the City's development permitting process, and would not use large amounts of energy or fuel in a wasteful, inefficient, or unnecessary manner. In addition, the proposed project would be required to comply with **Regulatory Compliance Measure EN-1** which would reduce energy usage on the project site during construction through reducing truck idling times. With implementation of **Regulatory Compliance Measure EN-1**, impacts to energy resources during project construction would be less than significant, and no mitigation is required. **Operation.** Energy use consumed by the proposed project would be associated with natural gas use, electricity consumption, and fuel used for vehicle and truck trips associated with the project. The estimated potential net increase in electricity demand associated with the operation of the proposed project is 3,106,447 kWh per year. Total electricity consumption in Orange County in 2022 was 20,243.7 GWh or 20,243,721,856 kWh. Therefore, operation of the proposed project would increase the annual electricity consumption in Orange County by less than 0.1 percent. The estimated potential net increase in natural gas demand associated with the proposed project is 38,407 therms per year. Total natural gas consumption in Orange County in 2022 was 572 million therms (572,454,744 therms). Therefore, operation of the proposed project would negligibly increase the annual natural gas consumption in Orange County by less than 0.1 percent. In addition, the proposed project would result in energy usage associated with gasoline and diesel to fuel project-related trips. The proposed project is estimated to result in the net decrease of approximately 6,498 gallons of gasoline and the net increase of approximately 132,401 of diesel fuel per year from existing conditions. Based on fuel consumption obtained from EMFAC2021, 155.9 million gallons of diesel and 1.2 billion gallons of gasoline are anticipated to be consumed from vehicle trips in Orange County in 2023. Therefore, vehicle and truck trips associated with the proposed project would not increase the annual gasoline fuel use in Orange County and would increase the annual diesel fuel use by approximately 0.1 percent in Orange County. Therefore, operation of the proposed project would represent a very small percentage of the annual gasoline and diesel fuel consumption in Orange County. Vehicles associated with trips to and from the project site would be subject to fuel economy and efficiency standards, which are applicable throughout the State. The proposed project would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy and would incorporate renewable energy or energy efficiency measures into building design, equipment uses, and transportation. Impacts would be less than significant, and no mitigation measures would be necessary.	**Regulatory Compliance Measure EN-1 Limit Idling Time.** The Applicant and construction contractor would be required to comply with applicable idling regulations for on-road vehicles during project construction and operation, which require truck drivers to turn off their engines within five minutes of idling.	Less Than Significant Impact.

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
Threshold ENG-2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? **Less Than Significant Impact. E**nergy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the overall use in the County. In addition, energy usage associated with operation of the proposed project would be relatively small in comparison to the overall use in Orange County and the State's available energy sources. Therefore, energy impacts at the regional level would be negligible. Because California's energy conservation planning actions are conducted at a regional level, and because the proposed project's total impact on regional energy supplies would be minor, the proposed project would not conflict with or obstruct California's energy conservation plans as described in the CEC's Integrated Energy Policy Report. Additionally, as demonstrated above, the proposed project would not result in the inefficient, wasteful, and unnecessary consumption of energy. Potential impacts related to conflict with or obstruction of a State or local plan for renewable energy or energy efficiency would be less than significant, and no mitigation is required.	No mitigation is required.	Less Than Significant Impact.
Cumulative Energy Impacts. **Less Than Significant Impact.** The geographic area for cumulative analysis of electricity is that of the SCE service area, while the geographic area for cumulative analysis of natural gas service is that of the SoCalGas service area. Construction and operation of the proposed project would result in an increased demand for electricity and natural gas service. However, this increase would be minimal and would not require SCE to expand or construct infrastructure that could cause substantial environmental impacts. The proposed project would not result in the demand for natural gas during construction; however, operation of the proposed project would increase on-site natural gas demand. As discussed previously, the estimated potential net increase in electricity demand associated with the operation of the proposed project is 3,106,447 kWh per year. Total electricity consumption in Orange County in 2022 was 20,243.7 GWh or 20,243,721,856 kWh and operation of the proposed project would increase the annual electricity consumption in Orange County by less than 0.1 percent. By 2030, consumption in Orange County is anticipated to increase by 12,000 GWh for the low-demand scenario and by 22,000 GWh for the high-demand scenario.[1] While this forecast represents a large increase in electricity consumption, the proposed project's share of cumulative consumption would be negligible. Energy use associated with the proposed project, in combination with energy use from the cumulative projects, would be within SCE's system-wide net annual increase in electricity supplies over the 2018 to 2030 period, and there are sufficient planned electricity supplies in the region for estimated net increases in energy demands. The estimated potential net increase in natural gas demand associated with proposed project operations is 38,407 therms per year. Development of the cumulative projects is not anticipated to require additional natural gas infrastructure or result in a substantial increase in demand. Total natural gas consumption in the SoCalGas service area in 2022 was 5,026 million therms (1,646 million therms for the industrial sector). Total natural gas consumption in Orange County in 2022 was 572 million therms (352 million therms for the residential sector and 221 million therms for the non-residential sector).[2] Per SoCalGas's forecast, total natural gas consumption in the SoCalGas service area is expected to remain steady through 2030 for low- and mid-demand scenarios and to increase by approximately 650 million therms under a high-demand scenario due to intense energy efficiency efforts.[3] Proposed project operations would negligibly increase the annual natural gas consumption in Orange County by less than 0.1 percent. It is anticipated that SoCalGas would be able to meet the natural gas demand of the proposed project and the cumulative projects without the need to develop additional facilities. In addition, both SCE and SoCalGas demand forecasts include the growth contemplated by the proposed project and the cumulative projects within their respective service areas. Increased energy efficiency to comply with building energy efficiency standards would reduce energy consumption on a per-square-foot basis. Furthermore, utility companies are required to increase their renewable energy sources to meet the Renewable Portfolio Standards mandate of 60 percent renewable supplies by 2030. SCE and SoCalGas plan to continue to provide reliable service to their customers and upgrade their distribution systems as necessary to meet future demand. In addition, the proposed project would result in energy usage associated with gasoline and diesel to fuel project-related trips. The proposed project is estimated to result in the net decrease of approximately 6,498 gallons of gasoline and the net increase of approximately 132,401 of diesel fuel per year from existing conditions. Based on fuel consumption obtained from EMFAC2021, 157.1 million gallons of diesel and 1.2 billion gallons of gasoline are anticipated to be consumed from vehicle trips in Orange County in 2024.	Refer to **Regulatory Compliance Measure EN-1** provided under **Threshold ENG-1**above.	Less Than Significant Impact.

1 CEC. 2018. *California Energy Demand, 2018–2030 Revised Forecast*. Publication Number: CEC-200-2018-002-CMF. February. Website: https://efiling.energy.ca.gov/getdocument.aspx?tn=223244 (accessed May 13, 2024).
2 CEC. 2019b. Gas Consumption by County. Website: http://www.ecdms.energy.ca.gov/gasbycounty.aspx (accessed May 13, 2024).
3 CEC. 2018. *California Energy Demand, 2018–2030 Revised Forecast*. Publication Number: CEC-200-2018-002-CMF. February. Website: https://efiling.energy.ca.gov/getdocument.aspx?tn=223244 (accessed May 13, 2024).

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
Therefore, vehicle and truck trips associated with the proposed project would not increase the annual gasoline fuel use in Orange County and would increase the annual diesel fuel use by approximately 0.1 percent in Orange County. Therefore, operation of the proposed project would represent a very small percentage of the annual gasoline and diesel fuel consumption in Orange County. Compliance with **Regulatory Compliance Measure EN-1** would help ensure that the proposed project does not result in an inefficient, wasteful, and unnecessary consumption of energy. Therefore, the proposed project's contribution to impacts related to the inefficient, wasteful, and unnecessary consumption of energy would not be cumulatively considerable, and no mitigation is required.		
4.6: Geology and Soils		
Threshold GEO-1(i): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidences of known fault? (Refer to Division of Mines and Geology Special Publication 42) **No Impact.** According to the Geotechnical Evaluation, active faults do not appear to be present under or in close proximity to the project site. Additionally, according to the California Geological Survey's EQ Zapp: California Earthquake Hazards Zone Application (EQ Zapp web-based application), the Newport-Inglewood and Whittier Fault Zones are the nearest fault zones located approximately 5.1 miles southwest and 11.6 miles northeast of the project site, respectively. Therefore, surface rupture is not anticipated to occur within the project site or surrounding vicinity. No impact would occur, and no mitigation is required.	No mitigation is required	No Impact.
Threshold GEO-1 (ii): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking? **Less Than Significant with Mitigation Incorporated.** The Geotechnical Evaluation determined no evidence of active faults to be present under or in close proximity to the project site. However, incidental ground cracking and other ground shaking phenomena can occur due to high seismic accelerations and regional seismic activity. Thus, it was determined in the Geotechnical Evaluation that risks associated with seismic shaking and strong ground motion are considered to be moderate. As specified in **Regulatory Compliance Measure GEO-1**, below, the proposed project's building would be subject to the seismic design criteria of the most current CBC requirements that aim to prevent building collapse and reduce the impacts of seismic ground shaking. Adherence to these requirements would address injury and loss of life and building damage after an earthquake. Therefore, with the implementation of **Regulatory Compliance Measure GEO-1**, impacts related to seismic ground shaking would be less than significant, and no mitigation is required.	**Regulatory Compliance Measure GEO-1** **Compliance with Seismic and Building Standards in the Building Code**. Prior to issuance of the first building permit for the proposed buildings, the City of Cypress (City) Engineer, Building Official, or their designee, and the project soils engineer shall review the building plans to verify that the structural design conforms to the requirements of the City's latest adopted edition of the California Building Standards Code. Structures and walls shall be designed in accordance with applicable sections of the City's Building Code.	Less Than Significant Impact.
Threshold GEO-1 (iii): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction? **Less Than Significant with Mitigation Incorporated.** According to the California Geological Survey's EQ Zapp, the project site is located in a Liquefaction Hazards Zone of required investigations. The Geotechnical Evaluation included a subsurface exploration and has determined the presence of potentially liquefiable soils to depths of 50 feet. Further analysis determined potential dynamic settlements of approximately 2.9 inches to 5.27 inches during a strong seismic event. Given the nature of the proposed project, which includes a light industrial facility with office and warehouse uses, differential settlements under current conditions could be significant. Thus, remedial grading, foundation considerations, and/or in-situ ground improvement measures are recommended in the Geotechnical Evaluation to help mitigate potential adverse effects due to soil liquefaction. Implementation of **Mitigation Measure GEO-1**, which requires the construction contractor to comply with the recommendations in the Geotechnical Evaluation to reduce the proposed project's impact related to liquefaction would be required. Therefore, with implementation of **Mitigation Measure GEO-1**, the proposed project's impacts related to liquefaction would be reduced to less than significant. The project would also be required to adhere to **Regulatory Compliance Measure GEO-1.**	**Mitigation Measure GEO-1** **Implementation of Geotechnical Evaluation Recommendations.** The Applicant's construction contractor shall implement the recommendations of the Geotechnical Evaluation prepared for the proposed project, as applicable, to the satisfaction of the City of Cypress' (City) Building Official, or designee. The City's Building Official, or designee, shall confirm recommendations have been implemented into the design and construction of the proposed project prior to the issuance of a building permit. **Regulatory Compliance Measure GEO-1 is** provided above.	Less Than Significant Impact with Mitigation Incorporated
Threshold GEO-1(iv): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides? No Impact. According to the City's General Plan Safety Element (2001), no significant topographic features exist within the City. Further, according to the Geotechnical Evaluation, the topography of the site is relatively flat to very gently sloping. Evidence of ancient landslides or slope instabilities were not observed at the project site. Both the project site and surrounding properties are flat with no unusual geographic features, and therefore, neither the project site nor the surrounding area has the potential for impacts related to landslides. No mitigation is required.	No mitigation is required.	No Impact.

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
Threshold GEO-2: Would the project result in substantial soil erosion or the loss of topsoil? **Less Than Significant Impact.** **Construction.** During project construction activities, soil would be exposed and disturbed, drainage patterns would be temporarily altered during grading and other construction activities, and there would be an increased potential for soil erosion and siltation compared to existing conditions. the Construction General Permit requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) (**Regulatory Compliance Measure HYD-1** in **Appendix B** of the Initial Study and the MMRP). The SWPPP would detail Erosion Control and Sediment Control Best Management Practices (BMPs) to be implemented during project construction to minimize erosion and retain sediment on site. With compliance with the requirements of the Construction General Permit and with implementation of the construction BMPs, construction impacts related to substantial soil erosion and loss of topsoil would be less than significant. **Operation:** Operation of the proposed project would not result in substantial soil erosion or loss of topsoil. Potential soil erosion impacts related to construction activities would be less than significant with adherence to the required regulations discussed above. Operation of the proposed project would result in no impacts related to soil erosion or loss of topsoil. No mitigation is required.	Refer to **Regulatory Compliance Measure HYD-1**, which is provided in **Appendix B** of the Initial Study and in the MMRP to the Draft EIR.	Less Than Significant Impact.
Threshold GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-site or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse? **Landslides and Unstable Slopes.** **Less Than Significant Impact.** Because the project site is in a flat area, landslides or other forms of natural slope instability do not represent a significant hazard to the project site or the surrounding area. The site is not within an area susceptible to landslides as both the project site and surrounding properties are flat with no unusual geographic features. Therefore, potential impacts related to landslides would be less than significant, and no mitigation is required. **Lateral Spreading.** **Less Than Significant Impact.** The Geotechnical Evaluation indicates that heavy lateral spreading is considered a low risk while ground cracking displacements, and localized spread is considered a moderate risk. These risks would be reduced by the implementation of **Regulatory Compliance Measure GEO-1**, which would include ground treatment and dewatering, as well as providing a capping of engineered fill. Therefore, potential impacts related to lateral spreading would be less than significant, and no mitigation is required. **Landslides and Unstable Slopes** **Less Than Significant Impact.** Because the project site is in a flat area, landslides or other forms of natural slope instability do not represent a significant hazard to the project site or the surrounding area. In addition, as discussed under Threshold GEO-1(iv), the site is not within an area susceptible to landslides as both the project site and surrounding properties are flat with no unusual geographic features. Therefore, potential impacts related to landslides would be less than significant, and no mitigation is required. **Lateral Spreading** **Less Than Significant Impact**. The Geotechnical Evaluation indicates that heavy lateral spreading is considered a low risk while ground cracking displacements, and localized spread is considered a moderate risk. These risks would be reduced by the implementation of **Regulatory Compliance Measure GEO-1**, which would include ground treatment and dewatering, as well as providing a capping of engineered fill. Therefore, potential impacts related to lateral spreading would be less than significant, and no mitigation is required. **Subsidence** **Less Than Significant Impact.** As specified in **Regulatory Compliance Measure GEO-1**, the proposed project's buildings would be subject to the seismic design criteria of the most current CBC requirements that aim to prevent building collapse and reduce the impacts of seismic ground shaking. Adherence to these requirements would address injury and loss of life and building damage during and after an earthquake. The proposed project's compliance with the most current CBC requirements would also reduce the project's impacts related to subsidence. Adherence to these requirements would address the removal and replacement of site soils. Therefore, with the implementation of **Regulatory Compliance Measure GEO-1**, impacts related to seismic ground shaking would be less than significant, and no mitigation is required. **Liquefaction and Compressible/Collapsible Soils** **Less Than Significant Impact.** As discussed under Threshold GEO-1(iii) above, implementation of **Mitigation Measure GEO-1** and adherence to the regulatory standards described in **Regulatory Compliance Measure GEO-1** would be required to address the proposed project's impacts with respect to liquefaction. Provided that design and remedial grading and ground improvement (as necessary) are	Refer to **Mitigation Measure GEO-1** and **Regulatory Compliance Measure GEO-1,** which are provided under **Threshold GEO-1** above.	Less Than Significant Impact.

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performed in accordance with the applicable requirements in the CBC, and current standards of practice in the area, excessive settlement resulting from liquefaction and compression of existing undocumented fill and some layers of loose sands and silty sands on the project site would be reduced to a less than significant level.		
Threshold GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating direct or indirect substantial risks to life or property? **Less Than Significant Impact**. According to the Geotechnical Evaluation prepared for the proposed project, surface site soils had a "very low" potential for expansion. No recommendations are provided in the Geotechnical Evaluation related to expansive soils due to this very low potential. Therefore, impacts related to expansive soils for the proposed project would be less than significant. No mitigation is required.	No mitigation is required.	Less Than Significant Impact.
Threshold GEO-5: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? **No Impact.** The proposed project would not include the use of septic tanks or alternative wastewater disposal systems because sanitary sewer and wastewater facilities are available in the vicinity of the project site. Therefore, the project would have no impact with respect to septic tanks or alternative wastewater disposal systems.	No mitigation is required.	No Impact.
Threshold GEO-6: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? **Less Than Significant with Mitigation Incorporated.** The project site contains Artificial Fill, which has no paleontological sensitivity, and Young Alluvium, Unit 2, which has low paleontological sensitivity from the surface to a depth of 10 feet and high paleontological sensitivity below 10 feet. With a maximum excavation depth of 8 feet during construction, the proposed project is expected to remain in deposits with no or low paleontological sensitivity. However, in the event that paleontological resources are encountered during construction, **Mitigation Measure GEO-2**, detailed below, would require work in the immediate area of the discovery to be halted and a qualified paleontologist to assess the discovery. These procedures would reduce potential impacts to scientifically significant nonrenewable paleontological resources encountered during construction.	**Mitigation Measure GEO-2** **Procedures for Unexpected Paleontological Resources Discoveries.** In the event that paleontological resources are encountered, work in the immediate area of the discovery shall be halted and the Applicant shall retain a professional paleontologist who meets the qualifications established by the Society of Vertebrate Paleontology to assess the discovery. The qualified, professional paleontologist shall make recommendations regarding the treatment and disposition of the discovered resources, as well as the need for subsequent paleontological mitigation, which may include, but not be limited to, paleontological monitoring, collection of observed resources, preservation, stabilization and identification of collected resources, curation of resources into a museum repository, and preparation of a monitoring report of findings, consistent with well accepted standards, such as those established by the Society of Vertebrate Paleontology. The City of Cypress shall ensure that the recommendations from the qualified, professional paleontologist shall be followed by the Applicant.	Less Than Significant with Mitigation Incorporated.
Cumulative Geology and Soils Impacts. **Less Than Significant Impact.** Typically, geology and soils impacts are specific to a particular project site and there is little, if any, cumulative relationship between the development of a proposed project and development within a larger cumulative area. Moreover, while seismic conditions are regional in nature, seismic impacts on a given project site are site-specific. While seismic events may affect a broad region, development of the cumulative projects would not increase the intensity, frequency, or duration of seismic events or the properties of off-site geology or soils. The CBC (adopted by reference in Chapter 15.08 [Construction Codes] of the City's Municipal Code) contains provisions to safeguard against major structural failures or loss of life caused by earthquakes, liquefaction, ground shaking, landslides, and other seismically induced hazards, as codified in **Regulatory Compliance Measure GEO-1**. In addition, the Geotechnical Evaluation recommendations would reduce potential impacts related to seismic ground shaking, liquefaction, compressible/collapsible soils as required by **Mitigation Measure GEO-1.** Cumulative development projects would be required to undergo environmental review pursuant to CEQA including, as necessary, site-specific investigation of potential geologic, seismic, or soil-related impacts. It is reasonable to expect that such site-specific investigation would appropriately identify the siting, design, and construction criteria established in the CBC and/or by the City to address site-specific geologic/soil conditions affecting future development, and that the City would condition future development to fully satisfy said criteria. Therefore, cumulative geologic, seismic, or soil-related impacts would be rendered to a less than significant level, and the project's contribution to such impacts would not be cumulatively considerable. Potential impacts of the proposed project to unknown paleontological resources and unique geologic features, when combined with the impacts of past, present, and reasonably foreseeable probable future projects in the City of Cypress, could contribute to a cumulatively significant impact due to the overall loss of paleontological remains unique to the region. However, each development proposal received by the City is required to undergo environmental review pursuant to CEQA. If there were any potential for significant impacts to paleontological resources or unique geologic features, an investigation would be required to determine the nature and extent of the	Refer to **Mitigation Measure GEO-1** and **Mitigation Measure GEO-2** and **Regulatory Compliance Measure GEO-1,** which are provided under **Threshold GEO-1 and GEO-6** above.	Less Than Significant Impact.

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
resources and identify appropriate mitigation measures. When resources are assessed and/or protected as they are discovered, impacts to these resources are less than significant. As such, implementation of **Mitigation Measure GEO-2** would ensure that the proposed project, together with cumulative projects, would not result in significant cumulative impacts to unique paleontological resources or unique geologic features.		
4.7: Greenhouse Gas Emissions		
Threshold GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? **Less Than Significant Impact.** **Construction.** Demolition and construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change. It is estimated that the proposed project would generate a total of approximately 536.4 MT CO_2e during construction of the project. When annualized over the 30-year life of the project, annual emissions would be 17.9 MT CO_2e. **Operation.** Long-term operation of the proposed project would generate GHG emissions from area, mobile, stationary, waste, and water sources as well as indirect emissions from sources associated with energy consumption. The proposed project would generate a total of 406 average daily trips (ADT), including 262 passenger vehicle trips, 50 two-axle truck trips, 16 three-axle truck trips, and 78 four-axle truck trips, which were included in CalEEMod. Existing uses would generate a total of 408 ADT. Mobile sources would be the largest source of GHG emissions for the proposed project at approximately 61 percent of the total project emissions. Energy sources would be the next largest category at approximately 33 percent. Water sources would be approximately 4 percent of the total emissions and waste sources would be approximately 2 percent of the total emissions. Area sources would be approximately less than 1 percent of the total emissions. Based on the analysis results, the proposed project would result in a net increase of 2,925.9 MT CO_2e/yr over existing conditions, which would be below the numeric threshold of 3,000 MT CO_2e. Therefore, operation of the proposed project would not generate significant GHG emissions that would have a significant effect on the environment. As such, impacts related to operational GHG emissions would be less than significant. No mitigation is required.	No mitigation is required.	Less Than Significant Impact.
Threshold GHG-2: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? **Less Than Significant Impact.** Applicable plans adopted for the purpose of reducing GHG emissions include CARB's 2022 Scoping Plan Update and SCAG's 2024–2050 RTP/SCS. The proposed project would not conflict with the stated goals of the RTP/SCS; therefore, the proposed project would not interfere with SCAG's ability to achieve the region's GHG reduction targets of 19 percent below 2005 per capita emissions levels by 2035, and it can be assumed that regional mobile emissions would decrease in line with the goals of the RTP/SCS. The proposed project would consist of a 191,394-square-foot light industrial building. Based on the nature of the proposed project, it is anticipated that implementation of the proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS. Therefore, the proposed project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Impacts would be less than significant, and no mitigation is required.	No mitigation is required.	Less Than Significant Impact.
Cumulative Greenhouse Gas Impacts. **Less Than Significant Impact.** Cumulative impacts are the collective impacts of one or more past, present, or reasonably foreseeable probable future projects, that when combined, result in adverse changes to the environment. Climate change is a global environmental problem in which: (1) any given development project contributes only a small portion of any net increase in GHGs, and (2) global growth is continuing to contribute large amounts of GHGs across the world. Land use projects may contribute to the phenomenon of global climate change in ways that would be experienced worldwide, and with some specific effects felt in California. However, no scientific study has established a direct causal link between individual land use project impacts and global warming. **Table 4.1: Summary of Cumulative Projects** identifies the past, present, and reasonably foreseeable probable future projects that when considered with the proposed project could result in cumulative impacts. The analysis of impacts related to GHG emissions is inherently cumulative. Potential	No mitigation is required.	Less Than Significant Impact.

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cumulative impacts would occur if the proposed project, when considered with the cumulative projects would result in significant impacts to GHGs. While the proposed project would generate GHGs as part of project construction and operations, these emissions would not exceed applicable thresholds. In addition, the proposed project would not conflict with applicable statewide and regional climate action plans and policies. Therefore, the proposed project's GHG emissions would not be cumulatively considerable and cumulative impacts associated with the proposed project would be less than significant.		
4.11: Noise		
Threshold NOI-1: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? **Less Than Significant Impact.** **Construction.** Short-term noise impacts would be associated with demolition of the existing office building, excavation, grading, and construction of the proposed structure. Construction-related short-term noise levels would be higher than existing ambient noise levels in the vicinity of the project site at the present time but would no longer occur once construction of the proposed project is completed. The combination of the equipment during the site preparation and grading phases, considering the usage factor of each piece of equipment, would result in a combined noise level of 59 dBA L_{eq} at a distance of 1,300 feet, which represents the distance from the center of construction activity at the project site to the nearest noise-sensitive hotel use (Courtyard by Marriott) to the southeast. While construction-related short-term noise levels have the potential to be higher than existing ambient noise levels in the vicinity of the project site under existing conditions, the noise impacts would no longer occur once project construction is completed. During deep dynamic compaction activities, the major source of noise would be the crane utilized to drop the weight. Construction noise levels would be similar to those during building construction as that construction phase would also include the operation of a crane. Although construction noise would be higher than the ambient noise in the vicinity of the project site, it would cease to occur once project construction is completed. Additionally, with the incorporation of **Regulatory Compliance Measure NOI-1**, all feasible and reasonable measures to reduce construction noise would be implemented, and a less than significant impact would occur. **Operation.** The increase in noise associated with project-related traffic would be very small, ranging from 0.0 to 1.7 dBA along the analyzed road segments. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment; These noise level increases are not perceptible by the human ear; therefore, off-site traffic noise impacts would be less than significant. No mitigation is required. Implementation of the proposed project would generate various on-site stationary noise sources, including heating, ventilation, and air conditioning (HVAC) and dock operations. The project would have various rooftop mechanical equipment, including HVAC units, on the proposed building. To be conservative, it is assumed the project could have four (4) rooftop HVAC units that would operate 24 hours per day and would generate sound power levels (SPL) of up to 76 dBA SPL or 63 dBA L_{eq} at 5 feet. Noise levels generated by delivery trucks would be similar to noise readings from truck loading and unloading activities, which generate a noise level of 75 dBA L_{eq} at 20 feet. To present a conservative assessment, it is assumed that unloading activities could occur at half of the 25 docks simultaneously for a period of more than 30 minutes in a given hour. Additionally, at the remaining half of the loading docks, it is conservatively assumed that refrigeration units attached to the trailers would be in operation while waiting to be unloaded. Based on reference measurements, each unit would have a reference noise level of 79.4 dBA at 15 feet. The proposed project would not substantially increase noise levels over existing conditions. Additionally, the proposed project will generate daytime and nighttime operational noise level increases ranging from 60 to 55 dBA L_{eq}. The estimated noise level at the closest noise-sensitive uses would be less than 34 dBA L_{eq}. Additionally, the proposed project would not substantially increase noise levels over existing conditions. Therefore, this impact would be less than significant. No mitigation is required.	**Standard Condition NOI-1** **Construction Noise and Vibration.** Prior to issuance of grading permits, the City of Cypress (City) Director of Community Development Department, or designee, shall verify that grading and construction plans include the following requirements: • Ensure that the greatest distance between noise sources and sensitive receptors during construction activities has been achieved. • Construction equipment, fixed or mobile, shall be equipped with properly operating and maintained noise mufflers consistent with manufacturers' standards • Construction staging areas shall be located away from off-site sensitive uses during the later phases of project development. • The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from noise-sensitive receptors nearest the project site whenever feasible. • The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators where feasible. • A sign, legible at a distance of 50 feet, shall also be posted at the construction site. as well as provide a telephone number for the "noise disturbance coordinator." • A "noise disturbance coordinator" shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures to reduce noise levels. All perimeter signs posted at the construction site perimeter shall list the telephone number for the disturbance coordinator.	Less Than Significant Impact.
Threshold NOI-2: Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels? **Less Than Significant with Mitigation Incorporated.** **Construction.** Construction of the proposed project could result in the generation of ground-borne vibration. For typical construction activity, the equipment with the highest vibration generation potential is the large bulldozer, which would generate 0.089 PPV in/sec at 25 feet. The closest surrounding buildings to the project site include existing industrial buildings located approximately 5 feet north of the edge of the project site. The industrial building would experience vibration levels of up to 0.995 in/sec PPV. This vibration level at the nearest building from construction equipment would potentially exceed the FTA threshold of 0.5 in/sec PPV for building damage. At a distance of approximately 8 feet from typical construction activities, vibration levels would approach 0.492 in/sec PPV and would be below the FTA	**Mitigation Measure NOI-1** **Less Than Significant with Mitigation Incorporated.** **Construction Vibration Monitoring Plan.** Due to the close proximity to surrounding structures, the City of Cypress (City) Director of Community Development, or designee, shall verify prior to issuance of demolition or grading permits, that the approved plans require that the construction contractor implement the following mitigation measures during project construction activities in the event that the use of heavy equipment is necessary within 25 feet (ft) of surrounding structures or when deep dynamic	Less Than Significant Impact.

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criteria of 0.5 in/sec PPV. While construction could result in vibration damage, impacts would be reduced to less than significant, and the potential for building damage would be eliminated with the incorporation of **Mitigation Measure NOI-1** as detailed below. For DDC construction activities, the proposed drops could occur as close as 50 feet from the nearest structures. The nearest off-site industrial building to the DDC construction activities would experience vibration levels of up to 1.02 in/sec PPV, which would potentially exceed the FTA threshold of 0.5 in/sec PPV for building damage. At a distance of approximately 78 feet from DDC construction activities, vibration levels would be 0.49 in/sec PPV and would be below the FTA criteria of 0.5 in/sec PPV. While construction could result in vibration damage, impacts would be reduced to less than significant, and the potential for building damage would be eliminated with the incorporation of **Mitigation Measure NOI-1** as detailed below.	compaction (DDC) construction activity takes places within 80 ft of surrounding structures: • Notification to nearby businesses detailing the schedule and duration of DDC activities • Structures that are located within 25 ft of heavy construction activities and within 80 ft of DDC construction activity that have the potential to be affected by ground-borne vibration shall be identified. This task shall be conducted by a qualified structural engineer as approved by the City's Director of Community Development, or designee. • The Applicant's construction contractor shall develop a vibration monitoring and construction contingency plan for approval by the City's Director of Community Development, or designee, to identify appropriate locations in the vicinity of nearby structures where monitoring would be conducted; set up a vibration monitoring schedule; define structure-specific maximum vibration limits based on building inspections; contain provisions to conduct photo, elevation, and crack surveys to document before and after construction conditions at those structures. The plan shall identify construction contingencies that would be implemented if vibration levels approach the established vibration limits at a particular location. Potential contingencies may include one or more of the following: o Lowering the height of the compaction weight; o Using a lighter compaction weight; or o Any other alternate method that is safe and appropriate, as determined by the project geotechnical consultant, in consultation with the City's Director of Community Development (such as utilizing geopier stabilization instead of DDC). [4] • At a minimum, vibration during initial site preparation activities at the locations described above shall be monitored. The monitoring results may indicate the need for more or less intensive measurements. • When vibration levels approach the applicable limits established in the vibration monitoring and construction contingency plan, construction shall be suspended and the appropriate mitigation measures identified in the construction contingency plan shall be implemented to reduce vibration levels below thresholds.	
Threshold NOI-3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? **Less Than Significant Impact.** The closest airport to the project site is Joint Forces Training Base (JFTB) Los Alamitos, which is located approximately 0.4 mile to the southwest. The noise contour boundaries of JFTB show that the project site is located outside of Noise Impact Zone 2 (60 dB CNEL or greater), therefore, this impact would be less than significant. No mitigation is required.	No mitigation is required.	Less Than Significant Impact.

[4] Utilizing a geopier stabilization system method is estimated to result in vibration levels of 0.22 at approximately 15 feet, which would ensure that vibration from construction within 10 feet remains lower than the threshold of 0.5 in/sec PPV for building damage.

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Cumulative Noise Impacts. **Less Than Significant Impact.** As defined in the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and reasonably foreseeable probable future projects. A cumulative noise or vibration impact would occur if multiple sources of noise and vibration combine to create impacts in close proximity to a sensitive receptor. Therefore, the cumulative area for noise and vibration impacts is the project site and any sensitive receptors in the immediately surrounding area. ***Construction Noise.*** Construction activities associated with the proposed project and other construction projects in the area may overlap, resulting in construction noise in the area. However, construction noise impacts primarily affect the areas immediately adjacent to each construction site. Construction noise for the proposed project was determined to be less than significant. Cumulative development in the vicinity of the project site could result in elevated construction noise levels at sensitive receptors in the area surrounding the project site. However, each project would be required to comply with the applicable City's Municipal Code limitations on construction. Therefore, cumulative construction noise impacts would be less than significant. ***Operational Traffic Source Noise Impacts.*** According to the USEPA, cumulative noise impacts represent the combined and incremental effects of human activities that accumulate over time. While the incremental impacts may be insignificant by themselves, the combined effect may result in a significant impact. Conversely, although there may be a significant noise increase due to the proposed project in combination with other related projects (combined effects), it must also be demonstrated that the project has an incremental effect. In other words, a significant portion of the noise increase must be due to the proposed project. As stated in Section 4.7, Transportation, the results of the Future Year (2025) Condition (Opening Year With Project) peak-hour level of service (LOS) analysis for the study area intersections show that all study area intersections are forecasted to operate at satisfactory LOS during both peak hours. Project-related traffic for the Opening Year With Project would result in noise level increases between 0.0 to 0.8 dBA CNEL along roadway segments in the vicinity of the project site. These levels are below the significance criteria for off-site traffic noise. Therefore, none of the roadway segments in the vicinity of the project site would experience a substantial noise level increase greater than the applicable noise thresholds, and the proposed project would not have a cumulatively significant traffic noise impact. ***Operational Stationary Source Noise.*** Long-term stationary noise sources associated with the development at the proposed project, combined with other cumulative projects, could cause local noise level increases. Noise levels associated with the proposed project and related projects together could result in higher noise levels than considered separately. As previously described, on-site noise sources associated with the proposed project would not exceed any applicable noise standards. Additionally, each of the related projects would be required to comply with the City's noise level standards and include mitigation measures if standards are exceeded. Therefore, cumulative noise impacts from stationary noise sources would be less than significant.	No mitigation is required.	Less Than Significant Impact.
4.13: Transportation		
Threshold TRA-1: Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? **Less Than Significant Impact.** The proposed project is anticipated to generate a net increase of 196 two-way trips per day with a net reduction of 28 a.m. peak hour trips and a net reduction of 22 p.m. peak hour trips (in passenger car equivalents [PCE]). Since the proposed project is likely to generate fewer than 50 net new peak-hour trips and fewer than 25 net new peak-hour trips at any single intersection, the implementation of the proposed project is not anticipated to result in any operational or LOS deficiencies; therefore, no further study is necessary. The City's General Plan provides goals and policies to implement a balanced, functional, and efficient circulation system, and incorporate alternative modes of travel which allows for the safe movement of people and goods. General Plan policies CIR-2.5 and CIR-2.8 encourage the development of adequate sidewalks, particularly to provide connections to surrounding alternative modes of transportation. The project site currently provides sidewalks along Plaza Drive and Walker Drive allowing for pedestrian connections to nearby transit. Therefore, the proposed project would not inhibit the use of alternative transportation in the area and would not conflict with circulation policies in the General Plan. Impacts would be less than significant, and no mitigation is required.	No mitigation is required.	Less Than Significant Impact.
Threshold TRA-2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? **Less Than Significant Impact.** The OPR Technical Advisory recommends that a project generating 110 average daily trips (ADT) or less be screened out of a VMT analysis due to the presumption of a less than significant impact. This recommendation is not based on any analysis of GHG reduction but is instead based on the potential trip generation of a project that would be categorically exempt under	No mitigation is required.	Less Than Significant Impact.

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CEQA. The proposed project includes the demolition of 150,626 square feet of office space and the construction of a new light industrial building that would be approximately 191,394 square feet in size. The proposed project does not qualify for any of the screening criteria, including the screening threshold for small projects because the proposed project would generate a net increase of 196 ADT and a total of 604 ADT. Therefore, a detailed VMT analysis was prepared. Additionally, the proposed project would constitute a significant impact if the project VMT metric is greater than 85 percent of the regional existing VMT metric. Hence the proposed project would constitute a significant impact if the project VMT per employee is greater than 85 percent of the Orange County VMT per employee (threshold). The project's VMT per employee would be lower than the Orange County regional threshold; therefore, the proposed project would have a less than significant impact related to VMT, and no mitigation measures are required.		
Threshold TRA-3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? **Less Than Significant Impact with Mitigation Incorporated.** Vehicular traffic to and from the project site would utilize the existing network of regional and local roadways that serve the project area. Access to the project site would be provided via two driveways at Plaza Drive and Douglas Drive. The proposed project would include the relocation of the existing driveways. The new westernmost driveway would be the primary truck access point and path to the truck loading docks on the proposed building's west side. The eastern driveway would be a shared driveway with the parcel to the east. It is anticipated that Driveway 1 (on Douglas Drive) and Driveway 2 (on Plaza Drive) would be utilized by heavy trucks to access the project site. Driveway 1 is anticipated to be able to accommodate the ingress and egress of heavy trucks as currently designed, providing access to and from the east on Plaza Drive and south on Douglas Drive. Driveway 1 would serve as the primary driveway for heavy trucks accessing the project site. While Driveway 2 would accommodate the ingress and egress of heavy trucks along Plaza Drive, it is recommended that the northwest curb of Driveway 2 be modified to accommodate a 25-foot curb radius for the egress of heavy trucks. Implementation of **Mitigation Measure TRA-1**, described below, would require the installation of on-site traffic signing and striping to direct heavy trucks to the driveway on Douglas Drive. With implementation of **Mitigation Measure TRA-1**, the proposed project would have a less than significant impact related to transportation hazards.	**Mitigation Measure TRA-1** **Truck Access & Routing Plan and Truck Signage and Striping Plan.** The Applicant shall submit a Truck Access and Routing Plan to accommodate the circulation of trucks on site. Additionally, the Applicant shall prepare a Signage and Striping Plan, consistent with the provisions of the California Manual on Uniform Traffic Control Devices (CA MUTCD), that directs heavy trucks to the most appropriate access point. The Public Works Director of the City of Cypress, or designee, shall review and approve the Truck Access and Routing Plan and Signage and Striping Plan and confirm they have been incorporated into the project plans prior to the issuance of a building permit.	Less Than Significant Impact.
Threshold 4.13.4: Would the project result in inadequate emergency access? **Less Than Significant Impact.** Vehicular access to the project site would be provided via two driveways at Plaza Drive and Douglas Drive. Plaza Drive would allow for adequate emergency access and all project improvements, including driveways, would be designed consistent with applicable emergency access standards. All emergency access routes to the proposed project and adjacent areas would be kept cleared and unobstructed during demolition and construction of the proposed project. No roadway closures or lane closures are anticipated as part of project construction. Therefore, the proposed project's effects on emergency access would be less than significant, and no mitigation is required.	No mitigation is required.	Less Than Significant Impact.
Cumulative Transportation Impacts **Less Than Significant Impact.** As defined in the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects. Potential cumulative impacts would occur if the proposed project in combination with one or more of the cumulative projects would produce significant impacts to transportation. For purposes of analyzing potential cumulative transportation impacts, the cumulative impact study area is the traffic study area outlined in the TIA. The cumulative projects that were determined to potentially affect one or more of the four study area intersections include: • Cypress Town Center (Multifamily Housing) • The Square (Shopping Center / Multifamily Housing / Hotel / Medical Office Building) • Goodman Commerce Center (High-Cube Warehousing) • 5995 Plaza Drive (General Office) The Future Year 2025 Condition includes the existing baseline traffic conditions, without project traffic conditions, and with project traffic conditions within the study area. Any additional traffic generated by other projects not on the cumulative projects list is likely accounted for through background ambient growth factors that have been applied to the peak hour volumes at study area intersections.	No mitigation is required.	Less Than Significant Impact.

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
The City of Cypress General Plan Circulation Element identifies LOS D or better as the desired citywide operating standard for most City streets. Traffic associated with the proposed project when combined with the cumulative projects would not exceed LOS D. Accordingly, the proposed project in combination with the cumulative projects would not conflict with circulation policies in the General Plan. Furthermore, like the proposed project, the cumulative projects would be required to comply with applicable programs, plans, ordinances, and policies addressing the circulation system. Accordingly, the proposed project in combination with the cumulative projects would not result in significant cumulative impacts associated with conflicts with these programs, plans, and policies. The proposed project's VMT per employee would be lower than the Orange County regional threshold; therefore, the proposed project would have a less than significant impact related to VMT. Like the proposed project, the cumulative projects would be required to evaluate VMT as part of the environmental review process for those projects. In the event significant VMT impacts were identified, the project would be required to adopt appropriate mitigation to reduce impacts to a less than significant level. Accordingly, the proposed project in combination with the cumulative projects would not result in significant cumulative impacts associated with VMT. The proposed project would result in a less than significant impact with mitigation incorporated in relationship to design hazards. This mitigation would include a truck access and routing plan and truck signage and striping to help accommodate truck access to the proposed project driveways. Similarly, the neighboring Goodman Center Project would also incorporate a truck access and routing plan and truck signage and striping to help accommodate truck access. It is assumed that the other cumulative projects would be designed in a manner consistent with the City's design standards and designs would be subject to review and approval by the City's Public Works Department. Consistency with the City's requirements would prevent implementation of design hazards. Accordingly, the proposed project in combination with the cumulative projects would not result in significant cumulative impacts associated with design hazards. Finally, the proposed project would allow for adequate emergency access via the two planned driveways. Similar to potential design hazards, it is assumed that the cumulative projects would be designed to meet the City's design standards and would be approved by the City prior to implementation. Therefore, the proposed project in combination with the cumulative projects would not result in significant cumulative impacts associated with emergency access.		
4.14: Tribal Cultural Resources		
Threshold TCR-1: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)? **No Impact.** The project site does not contain any "historical resources" as defined by CEQA. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines or PRC 5020.1(k). Native American consultation was conducted in compliance with AB 52. As part of the consultation process, a review of the SLF by the NAHC yielded negative results. Subsequently 21 Native American representatives were contacted by the City to determine their desire to consult on the proposed project. During that process, the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) stated that the project site is within their tribal territory and requested consultation with the City. The Kizh Nation was provided with a summary of the project and its location. No information regarding specific known tribal cultural resources on the project site was provided by the Kizh Nation. Therefore, the proposed project would not result in any impacts to tribal cultural resources that are listed or eligible for listing in the State or local register of historical resources. No mitigation is required.	No mitigation is required.	No Impact
Threshold TCR-2: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. **Less Than Significant with Mitigation Incorporated.** The project site is not likely to contain any prehistoric site or archaeological resources based on archival research and field surveys conducted for the project site. There is little potential for the proposed project to impact prehistoric resources due to the low likelihood of resource presence, significant prior disturbance from past grading and development activities on the project site and in the surrounding area. However**, Mitigation Measure CUL-1**, as provided in Section 4.2	Refer to **Mitigation Measure CUL-1** and **Regulatory Compliance Measure CUL-1**, which is provided above in **Threshold CUL-2,** and **CUL-3** under Cultural Resources. **Mitigation Measure TCR-1** **Mitigation Measure TCR-1 Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.** The project Applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation). The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project	Less Than Significant Impact.

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
Cultural Resources of the Draft EIR, has been included to mitigate potentially significant impacts associated with the unlikely discovery of archaeological resources, including tribal cultural resources (TCRs), on the project site. Therefore, implementation of **Mitigation Measure CUL-1** would reduce potentially significant impacts to unknown tribal cultural resources to a less than significant level. During the consultation process, The Kizh Nation provided mitigation measures to address potential impacts related to tribal cultural resources. Implementation of **Mitigation Measures TCR-1 through TCR-3**, which incorporate the recommendations of the Kizh Nation, would reduce any potential impacts to previously undiscovered tribal cultural resources to a less than significant level. Therefore, on this basis and as a result of the City's consultation with the Kizh Nation or any other interested local Native American tribe, the City has concluded that, with implementation of **Mitigation Measures TCR-1 through TCR-3**, potential impacts related to unknown buried tribal cultural resources would also be reduced below a level of significance.	description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground- disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project Applicant/lead agency upon written request to the Tribe. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh Nation from a designated point of contact for the project Applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh Nation to the project Applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh Nation TCRs. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh Nation monitor and/or Kizh Nation archaeologist. The Kizh Nation will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes. **Mitigation Measure TCR-2** **Unanticipated Discovery of Human Remains and Associated Funerary Objects.** Native American human remains are defined in Public Resources Code 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.	

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
	Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh Nation determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh Nation monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).) Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance. **Mitigation Measure TCR-3** **Procedures for Burials and Funerary Remains.** As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. In the event preservation in place is not possible despite good faith efforts by the project Applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.	

Table 1.1: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measure, and Level of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
	Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.	
Cumulative Tribal Cultural Resources Impacts. **Less Than Significant Impact with Mitigation Incorporated.** The proposed project would result in less than significant impacts to known and unknown tribal cultural resources listed or eligible for listing in the California Register, in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or otherwise determined by the lead agency to be significant. Further, each individual development proposal received by the City that requires discretionary approval is required to undergo individual environmental review pursuant to CEQA. AB 52 outreach would be required for those discretionary projects for which a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report is prepared. Furthermore, impacts of other projects on tribal cultural resources are generally site-specific resulting from ground-disturbing activities, which would require unique impact analysis to determine the nature and extent of the resources and identify appropriate mitigation measures that would reduce or avoid significant impacts. Thus, there is no potential for the project to contribute towards a significant cumulative impact associated with the significance of a tribal cultural resource pursuant to California Code of Regulations Section 15064.5. Additionally, when resources can be assessed and/or protected as they are discovered, impacts to these resources are less than significant. As such, implementation of **Mitigation Measures TCR-1 through TCR-3** would ensure that the proposed project, together with the related projects, would not result in significant cumulative impacts to tribal cultural resources.	See Mitigation Measure **TCR-1 through TCR-3** under **Threshold TCR-2** above.	Less Than Significant Impact with Mitigation Incorporated.

2.0 INTRODUCTION

This Draft Environmental Impact Report (EIR) has been prepared to evaluate environmental impacts associated with the proposed 5665 Plaza Drive Project (proposed project) in Cypress, California. The proposed project would include the demolition of an existing 150,626-square-foot, five-story office building and the construction of a new 191,394-square-foot light industrial building. The proposed building would include 181,061 square feet of warehouse space and 10,333 square feet of office space. The maximum height of the proposed building would be approximately 51 feet, 6 inches, to the top of the parapet. The proposed project would include a truck loading area with 25 dock-high loading doors on the west side of the proposed building. The project site is currently accessible from two driveways along Plaza Drive which will be relocated as part of the project. The new westernmost driveway would be the primary truck access point and path to the truck-loading docks on the proposed building's west side. The eastern driveway would be a shared driveway with the parcel to the east. The proposed project would include parking stalls throughout the project site's perimeter, new water and sewer lines connecting with existing water and sewer mains within Plaza Drive, new stormwater infrastructure, and new ornamental landscaping.

The City of Cypress (City) is the "public agency which has the principal responsibility for carrying out or approving the project"[5] and, as such, is the "Lead Agency" for purposes of preparing an EIR for the proposed project under the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 *et seq*.). CEQA requires the Lead Agency to consider the information contained in the EIR prior to taking any discretionary action on the proposed project. This EIR is intended to serve as an informational document to be considered by the City and any Responsible Agencies during deliberations on the proposed project. CEQA Section 21069 defines a "Responsible Agency" as a public agency other than the Lead Agency that has responsibility for carrying out or approving a project. The approvals and permits associated with the proposed project are detailed further in Chapter 3.0, Project Description.

The City, as Lead Agency, determined that the proposed project may have a significant effect on the environment and that an EIR would be required to more fully evaluate potential adverse environmental impacts that may result from development of the proposed project. As a result, this EIR has been prepared in accordance with CEQA and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000 et seq.). This EIR also complies with the procedures established by the City for the implementation of CEQA.

2.1 PURPOSE AND USES OF THE EIR

This EIR has been prepared to evaluate potential environmental impacts that could result from implementation of the proposed project. As the Lead Agency, the City has the principal responsibility for approving the proposed project. In that capacity, the City has decided to prepare this EIR and, after the public review process, will decide whether to certify the Final EIR.

[5] As defined in Public Resources Code Section 21067.

The City and any Responsible Agencies have the authority to make decisions on discretionary actions relating to development of the proposed project. As stated previously, this EIR is intended to serve as an informational document to be considered by the City and Responsible Agencies during deliberations on the proposed project. This EIR evaluates a reasonable worst-case scenario of potential impacts associated with the proposed project and identifies feasible mitigation and alternatives for any identified potentially significant impacts.

This EIR will serve as a project EIR pursuant to State CEQA Guidelines Section 15161. According to Section 15161 of the State CEQA Guidelines, a project EIR is appropriate for specific development projects and should examine the environmental impacts that could result from all phases of the project, including planning, construction, and operation.

As the Lead Agency for the proposed project under CEQA, the City must consider the information contained in the Final EIR prior to taking any discretionary action with respect to the proposed project. This EIR provides information to the Lead Agency and other public agencies, the general public, and decision-makers regarding the potential environmental impacts from construction and operation of the proposed project. The purpose of the public review of this EIR is to evaluate the adequacy of the environmental analysis in terms of compliance with CEQA. State CEQA Guidelines Section 15151 states the following regarding the standards from which adequacy is judged:

> "An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts. The courts have not looked for perfection but for adequacy, completeness, and a good faith effort at full disclosure."

Public Resources Code Section 21002.1(a) states:

> "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided."

An EIR is the most comprehensive form of environmental documentation identified in CEQA and the State CEQA Guidelines and provides the information needed to assess the environmental consequences of a proposed project. EIRs are intended to provide an objective, factually supported, full-disclosure analysis of the environmental consequences associated with a proposed project that has the potential to result in significant, adverse environmental impacts.

2.2 ENVIRONMENTAL REVIEW PROCESS

In compliance with CEQA and the State CEQA Guidelines, the City has taken steps to promote opportunities for the public and other public agencies to participate in the environmental review process. An Initial Study (IS) was completed for the proposed project and the City initially determined that a Mitigated Negative Declaration (MND) would be prepared. However, based on

comments received from the public, the City decided that an EIR would be prepared to evaluate the potentially significant environmental effects of the proposed project and related actions. Preparation of an EIR required the City to engage in public scoping for the project. To conduct public scoping, the City issued a Notice of Preparation (NOP) of an EIR and held a public scoping meeting. The scoping process is further discussed below.

2.2.1 Notice of Preparation/Scoping Meeting

On May 7, 2024, an NOP for the EIR was posted to the City's website and distributed by the City via the State Clearinghouse (SCH). The NOP was circulated for review from May 7 to June 5, 2024. The SCH number for this EIR is SCH No. 2020069007. In accordance with State CEQA Guidelines Section 15082, the NOP was circulated to public agencies and interested individuals and was posted at the Orange County Clerk-Recorder's Office for a period of 30 days. A full list of the agencies and individuals contacted is presented in **Appendix A** of this EIR, Public Involvement. During the 30-day public scoping period, written comments were solicited pertaining to environmental issues/topics that this EIR should evaluate. The City held a virtual public scoping meeting on Tuesday, May 28, 2024, to present the proposed project and to solicit input from interested parties. One public comment was received during the Scoping Meeting.

Responses to the NOP were received from the following agencies:

- City of Los Alamitos
- Native American Heritage Commission (NAHC)

In addition, the following organizations and interested parties submitted written comments on the NOP:

- Allyssa J. Holcomb (on behalf of Warland Investments Company)

2.2.2 Issues Raised

Issues and concerns raised in response to the NOP or at the scoping meeting included:

Allyssa J. Holcomb, Garrett Stiepel Ryder, LLP, on behalf of Warland Investments Company

- **Air Quality**: Concern related to excessive air pollution due to the proposed project's foreseeable use as a logistics center. Concern that the proposed project failed to address the impact of refrigerated trucks on air quality and did not evaluate the air quality impact of off-site effects, such as vehicle and truck trips. Concerns regarding the short and long-term impacts to air quality in surrounding areas due to the proposed cumulative redevelopment of 5665 Plaza Drive. Stated that the proposed project does not consider the air quality impacts of refrigerated trucks accessing the project site and also fails to evaluate off-site air quality impacts.

- **Greenhouse Gas Emissions:** Concern that the proposed project would exceed the SCAQMD threshold and concerned that the analysis also fails to clearly evaluate the effects of off-site Greenhouse gas emissions. Concerns related to the failure to meet "Less than Significant" emissions by exceeding the 3,000 MT CO2e per year SCAQMD threshold and the failure to evaluate the effects of off-site GHG emissions.

- **Land Use:** Suggestion that the City should not only limit the scope of the EIR to current permitted uses.

- **Noise:** Concern related to increased noise generation due to the proposed project's foreseeable use as a logistics center

- **Traffic:** Concern related to increased traffic congestion due to the proposed project's foreseeable use as a logistics center. Concern related to the Truck Distribution Map in the Traffic Analysis for the proposed project. It was stated that the analysis failed to account for truck traffic from the entire Goodman Commerce Center (the 5665 Plaza Drive Project and the Goodman Commerce Center Project). It was stated that the proposed project made the incorrect assumption that 100 percent of truck traffic would exit via Driveway 1 and omitted detailed projections for truck routes, especially regarding the impact on nearby residential areas. Concern that the Traffic Analysis inaccurately estimated daily truck trips by solely evaluating the 5665 Redevelopment, rather than considering the entire Goodman Commerce Center as a logistics hub, leading to a significant underestimation of truck traffic impacts.

City of Los Alamitos

- **Air Quality**: Suggestion that the Draft EIR include an evaluation of the proposed project's impact on air quality due to the proposed change in land use.

- **Greenhouse Gas Emissions**: Suggestion that the Draft EIR include an evaluation of the proposed project's impact on Greenhouse Gas Emissions due to the proposed change in land use.

- **Noise**: Suggestion that the proposed project include an evaluation of 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.

- **Traffic**: Suggestion that the Draft EIR include the existing truck routes, the project's impact to and along the truck routes, and any impacts or needs to modify truck routes. Suggestion that the proposed project should provide a traffic and/or access analyses that evaluates the daily truck trips and their distribution and influence on Los Alamitos roadways.

NAHC

- **Tribal Cultural Resources**: Outlined the City's tribal consultation requirements under Assembly Bill 52 and Senate Bill 18

This is not an exhaustive list of areas of controversy, but rather key issues that were raised during the scoping process. Section 15064(e) of the State CEQA Guidelines states, "economic and social changes resulting from the project shall not be treated as significant effects on the environment." Therefore, economic issues are not addressed under CEQA and will not be address in this EIR. This EIR addresses each of the remaining areas of concern or controversy in detail, examines project-related and cumulative environmental impacts, identifies significant adverse environmental impacts, and proposes mitigation measures and/or alternatives designed to reduce or eliminate potentially

significant impacts. **Appendix A** includes the NOP and copies of written comments received in response to the NOP. **Appendix A** also includes a comment summary.

2.2.3 EIR Public Review Period

This EIR is being distributed to numerous public agencies and other interested parties for review and comment. This EIR is also available on the City's website:

> https://www.cypressca.org/departments/community-development/information-on-notable-projects/goodman-commerce-center-5665-plaza-drive

Additionally, a copy of this EIR will be available for public review at the Planning Division counter at Cypress City Hall located at 5275 Orange Avenue, Cypress, CA 90630.

All comments received from agencies and individuals on this EIR will be accepted during the public comment period, which will not be less than 45 days, in compliance with CEQA and *the* State CEQA Guidelines.

All comments on this EIR should be sent to the following City contact person:

> Alicia Velasco
> Planning Director
> City of Cypress
> Community Development Department
> 5275 Orange Avenue
> Cypress, CA 90630
> Email: avelasco@cypressca.org

Following the close of the public comment period, the City will prepare written responses to all written comments received during the public comment period and will compile these comments and responses, together with any text changes to this EIR, into a Final EIR that includes all of the information required pursuant to State CEQA Guidelines Section 15132. The Final EIR will be provided to all public agencies that submitted comments on this EIR at least 10 days prior to certification of the Final EIR. The Final EIR shall consist of the EIR or a revision of the draft; comments, and recommendations received on the EIR either verbatim or in summary; a list of persons, organizations, and public agencies commenting on the EIR; the response of the City to significant environmental points raised in the review and consultation process and in comments submitted on the Draft EIR; and any other information added by the City.

The City will make findings regarding the extent and nature of the impacts as presented in the Final EIR. The Final EIR must be certified as complete by the City Council prior to making a decision on the requested entitlements for the proposed project. Public input is encouraged at all public hearings regarding the proposed project.

2.3 SCOPE OF THIS EIR

As required by State CEQA Guidelines Section 15128, this EIR must identify the effects of the proposed project that are determined to be significant. The IS for the proposed project identified

impacts associated with Aesthetics, Agricultural/Forestry Resources, Biological Resources, Hazards & Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mineral Resources, Population/ Housing, Public Services, Recreation, Utilities/Service Systems, and Wildfire would all be less than significant. Accordingly, the environmental topics addressed in this EIR include Air Quality, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Noise, Transportation, and Tribal Cultural Resources.

2.4 FORMAT OF THE EIR

This EIR contains the information and analysis required by CEQA and the State CEQA Guidelines, including Sections 15122–15131, and is generally organized as follows:

- **Chapter 1.0: Executive Summary.** Chapter 1.0 contains the Executive Summary of this EIR, which lists all significant project impacts, feasible mitigation measures that have been recommended to reduce any significant impacts of the proposed project, and the level of significance of each impact following feasible mitigation. The summary is presented in a table format.

- **Chapter 2.0: Introduction.** Chapter 2.0 contains a discussion of the purpose and intended use of this EIR.

- **Chapter 3.0: Project Description.** Chapter 3.0 includes a discussion of the proposed project's geographical setting, the project site's previous uses, and the proposed project's objectives, characteristics, components, and construction phases, as well as the anticipated discretionary and ministerial permits and approvals for the proposed project.

- **Chapter 4.0: Environmental Impact Analysis.** Chapter 4.0 includes an analysis of the proposed project's environmental impacts. It is organized into the following topical sections: Air Quality, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Noise, Transportation, and Tribal Cultural Resources. The environmental setting discussions describe the "existing conditions" of the environment on the project site and in the vicinity of the site as they pertain to the environmental issues being analyzed (State CEQA Guidelines Section 15125).

  The impact discussions identify and focus on the potentially significant environmental effects of the proposed project. The direct and indirect effects of the proposed project on the environment are identified and described, giving due consideration to both the short-term and long-term effects, as necessary (State CEQA Guidelines Section 15126.2[a]).

  Chapter 4.0 also includes within the analysis of each environmental topic a discussion of the cumulative effects of the proposed project when considered in combination with other projects causing related impacts, as required by State CEQA Guidelines Section 15130. Cumulative impacts are based on the build out of the proposed project and the known relevant approved and proposed projects in the surrounding area.

  The discussions of mitigation measures identify and describe feasible measures that could minimize or lessen potentially significant impacts for each significant environmental effect identified in this EIR (State CEQA Guidelines Section 15126[e]). The levels of significance before

and after mitigation are provided. Significant unavoidable adverse effects are identified where mitigation is not expected to reduce the effects to less than significant levels.

- **Chapter 5.0: Alternatives to the Proposed Project.** In accordance with CEQA, the alternatives discussion in Chapter 5.0 describes a reasonable range of alternatives that could feasibly attain the basic objectives of the proposed project and are capable of eliminating or substantially reducing any of the proposed project's significant adverse environmental effects or reducing them to a less than significant level. The alternatives analyzed in Chapter 5.0 include four alternatives: (1) the No Project Alternative, (2) the Reduced Footprint Alternative, (3) the No Refrigeration Warehouse Alternative, and (4) the Modified Geotechnical Approach Alternative.

- **Chapter 6.0: Other CEQA Considerations.** Chapter 6.0 contains discussions on the following topics as required by State CEQA Guidelines Section 15126: (1) growth-inducing impacts of the proposed project; and (2) whether there are any significant irreversible environmental changes caused by the proposed project, adverse environmental impacts associated with the proposed project for which either no mitigation or only partial mitigation is feasible.

- **Chapter 7.0: Mitigation Monitoring and Reporting Program.** State CEQA Guidelines Section 15091(d) requires that public agencies adopt a mitigation monitoring and reporting program for any changes that it has either required in a project or made a condition of approval to avoid or substantially lessen significant environmental effects. Chapter 7.0 provides a list of all proposed project mitigation measures, defines the parties responsible for implementation and review, and identifies the timing for implementation of each mitigation measure.

- **Chapter 8.0: Significant Unavoidable Impacts.** Chapter 8.0 summarizes the significant unavoidable adverse impacts that cannot be avoided or mitigated as identified in Chapters 4.0 and 6.0.

- **Chapter 9.0: List of Preparers.** Chapter 9.0 provides the organizations and persons contacted during preparation of this EIR, the EIR preparers and technical report authors, and other experts involved in the preparation of this EIR.

- **Chapter 10.0: References.** Chapter 10.0 provides the references used in this EIR.

2.5 INCORPORATION BY REFERENCE

An EIR may incorporate by reference all or portions of another document that is a matter of public record or is generally available to the public, consistent with State CEQA Guidelines Section 15150. Informational details from the documents that have been incorporated by reference are summarized in the appropriate sections of this EIR, along with descriptions regarding how the public may review these documents. All documents are available for review at the City of Cypress, Community Development Department. These documents include:

- City of Cypress General Plan (available online at: https://www.cypressca.org/government/departments/community-development/planning-division/city-plans)

- City of Cypress Municipal Code (available online at: https://qcode.us/codes/cypress/)
- McDonnell Center Amended Specific Plan (available online at: https://www.cypressca.org/home/showpublisheddocument/9697/637363718993530000)

3.0 PROJECT DESCRIPTION

This chapter of the EIR describes the proposed 5665 Plaza Drive Project (proposed project), including the project overview and a description of the proposed project's location, objectives, and the approvals required for project implementation.

3.1 PROJECT APPLICANT

GLC Cypress LLC
c/o Goodman North America Management
3333 Michelson, Suite 1050
Irvine, CA 92612
Project Representative: Blair Dahl

3.2 LEAD AGENCY CONTACT PERSON

Consistent with State CEQA Guidelines Section 15050, the City of Cypress is the Lead Agency under CEQA and is responsible for adoption of the EIR and approval of the proposed project.

Alicia Velasco
Planning Director City of Cypress
5275 Orange Avenue
Cypress, CA 90630
Phone: (714) 229-6720
Email: avelasco@cypressca.org

3.3 PROJECT OVERVIEW

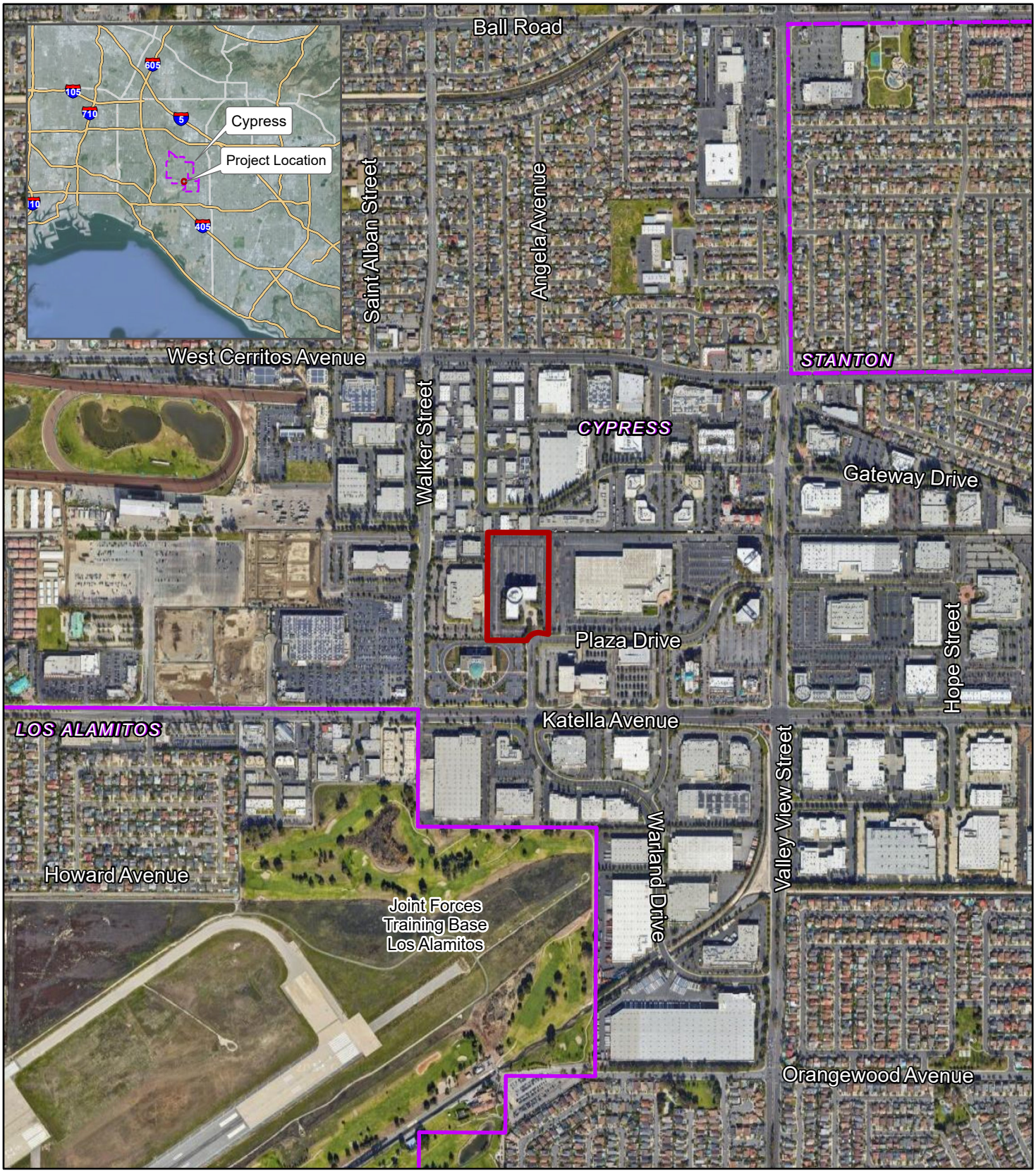
Goodman (the Project Applicant) proposes to demolish an existing 150,626-square-foot five-story office building on an 8.53-acre site at 5665 Plaza Drive (project site) in the city of Cypress and construct a new 191,394-square-foot light industrial building, with associated office space, landscaping, surface parking, and utility improvements.

3.4 PROJECT LOCATION AND SITE DESCRIPTION

3.4.1 Regional Location

The project site is in the southern part of the city of Cypress at 5665 Plaza Drive, north of the intersection of Plaza Drive and Douglas Drive. The city of Cypress is located in northwestern Orange County, California, approximately 20 miles southeast of downtown Los Angeles. The project site is approximately 3.5 miles south of State Route 91 (SR-91), approximately 4.75 miles southwest of Interstate 5 (I-5), approximately 2.75 miles east of Interstate 605 (I-605), and approximately 2.2 miles north of State Route 22 (SR-22). Local access to the project site is provided via Plaza Drive. **Figure 3.1, Regional and Project Site Location**, shows the location of the project site within Cypress and northwestern Orange County.

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FIGURE 3.1

SOURCE: Google Maps (2023)

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5665 Plaza Drive Project Draft Environmental Impact Report

Regional and Project Site Location

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3.4.2 Existing Project Site Conditions

The project site is currently developed with a 150,626-square-foot, five-story, office building, a surface parking lot, and ornamental landscaping. As of May 2024, the existing office building was vacant and had no tenants. However, the existing office building has historically been occupied. The current vacancy of the existing office building is not consistent with historic on-site operations, which may be re-established under existing regulations. In August 2023, 61,756 square feet (approximately 41 percent) of the existing 150,626 square foot building was leased and occupied by Toyo Tire and an accounting firm. To be conservative, the analysis in this EIR assumes a baseline condition of 37,657 square feet or 25 percent occupancy. This conservative estimate is lower than the historic occupancy levels, as reflected by the previous tenant conditions in August 2023.

The project site is bounded by industrial and office uses to the north, industrial uses to the west, Plaza Drive to the south, and the Goodman Commerce Center Project to the east. The Goodman Commerce Center Project, approved in April 2023, was under construction at the time of the preparation of this EIR. The Goodman Commerce Center Project consists of two light industrial buildings totaling 390,268 square feet. **Figure 3.2, Aerial Photograph and Surrounding Land Uses,** depicts the project site in a local setting.

3.5 GENERAL PLAN, SPECIFIC PLAN, AND ZONING

3.5.1 General Plan/Specific Plan

The City of Cypress General Plan Land Use Policy Map designates the project site as "Specific Plan Area." **Figure 3.3, General Plan Land Use in the Project Area,** depicts General Plan land uses at the project site and in the surrounding areas. The project site is in the McDonnell Center Amended Specific Plan (Specific Plan) area, shown in **Figure 3.4, McDonnell Center Specific Plan Area**. The McDonnell Center Amended Specific Plan covers approximately 71 acres in the southeastern portion of the City. The project site is within Planning Area 1 of the Specific Plan area and is currently designated for general office uses.

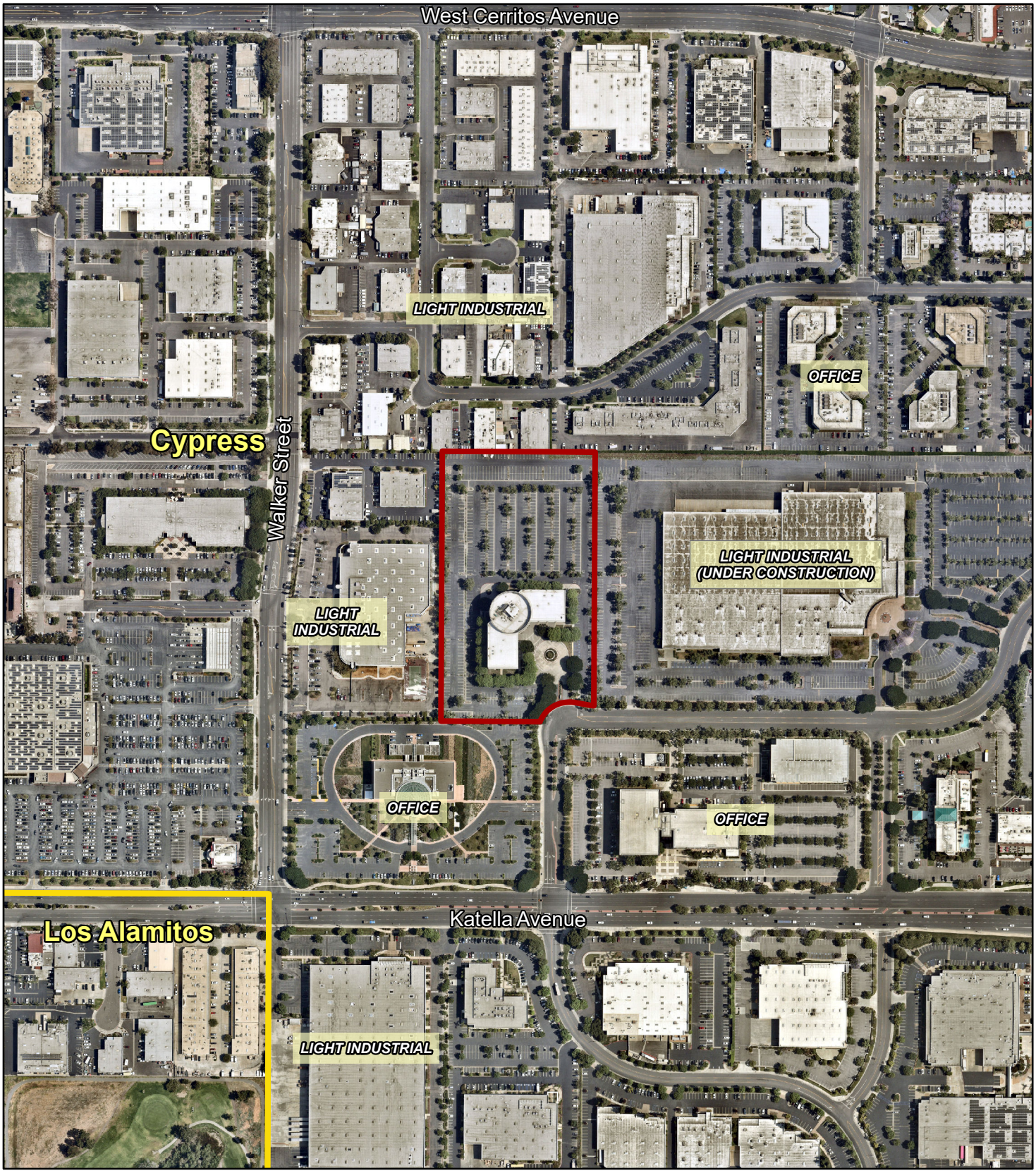
3.5.2 Current Zoning

Figure 3.5, Existing Zoning Map, depicts zoning for the City. The project site is located in a PC (Planned Community) zoning district. The City's zoning ordinance describes PC zoning districts as being:

> …established to provide opportunity for the design and development of integrated, master-planned projects in areas of the city which may benefit from special design standards and land uses not otherwise possible under conventional zoning district regulations. The PC zoning district is intended to permit a compatible mix of land uses, planned commercial developments, and business parks, and a variety of housing styles and densities. The PC zoning district is consistent with all residential and business park land use designations of the general plan. Each PC zoning district established shall be indicated by a unique zoning district designation.[6]

[6] City of Cypress Municipal Code, Section 2.08.020(C), PC (Planned Community) Zoning District. Website: https://ecode360.com/43174998 (accessed May 10, 2024).

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Project Site

City Boundary

FIGURE 3.2

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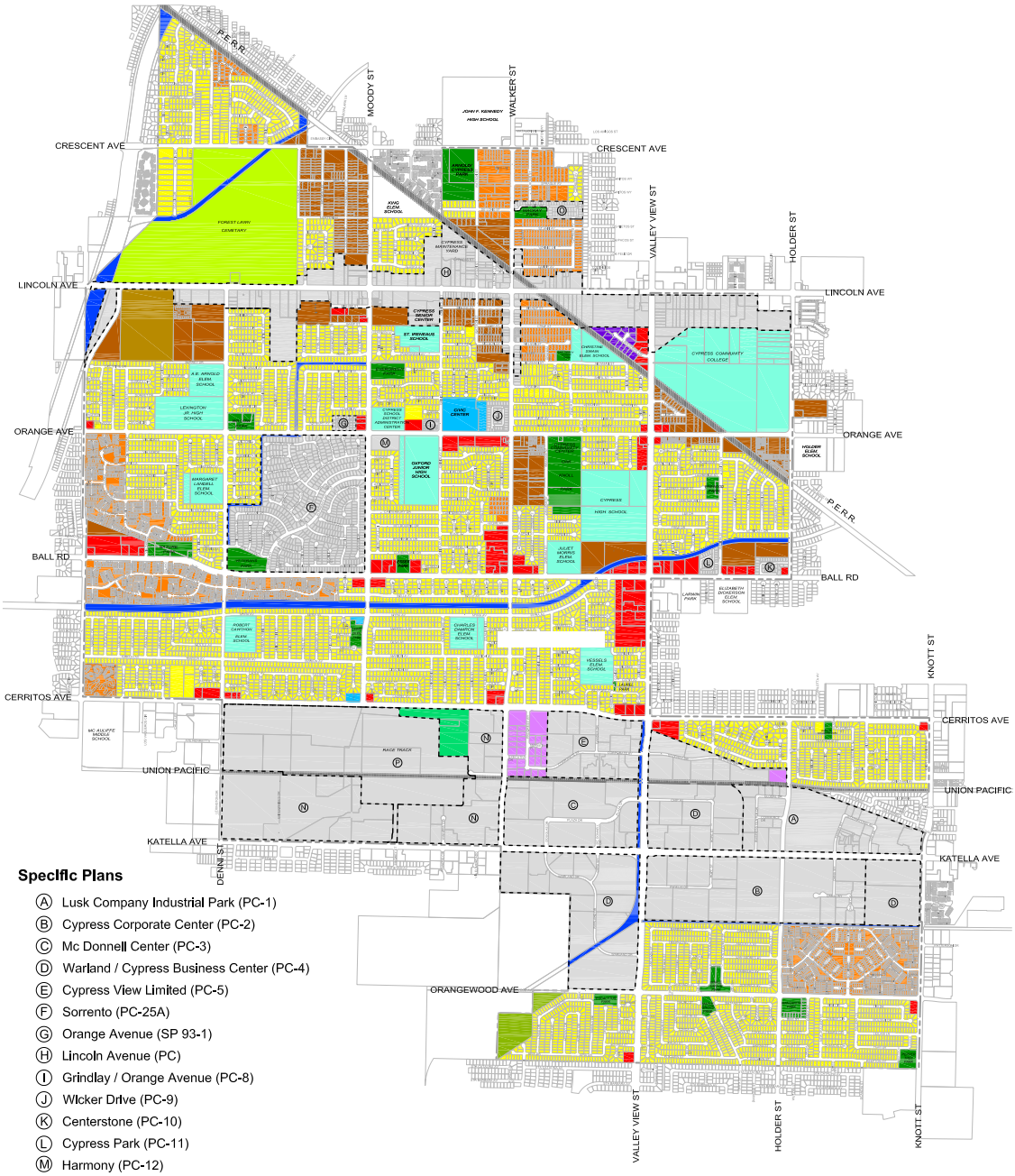
SOURCE: Nearmap (June 17, 2023)

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Aerial Photograph and Surrounding Land Uses

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FIGURE 3.3

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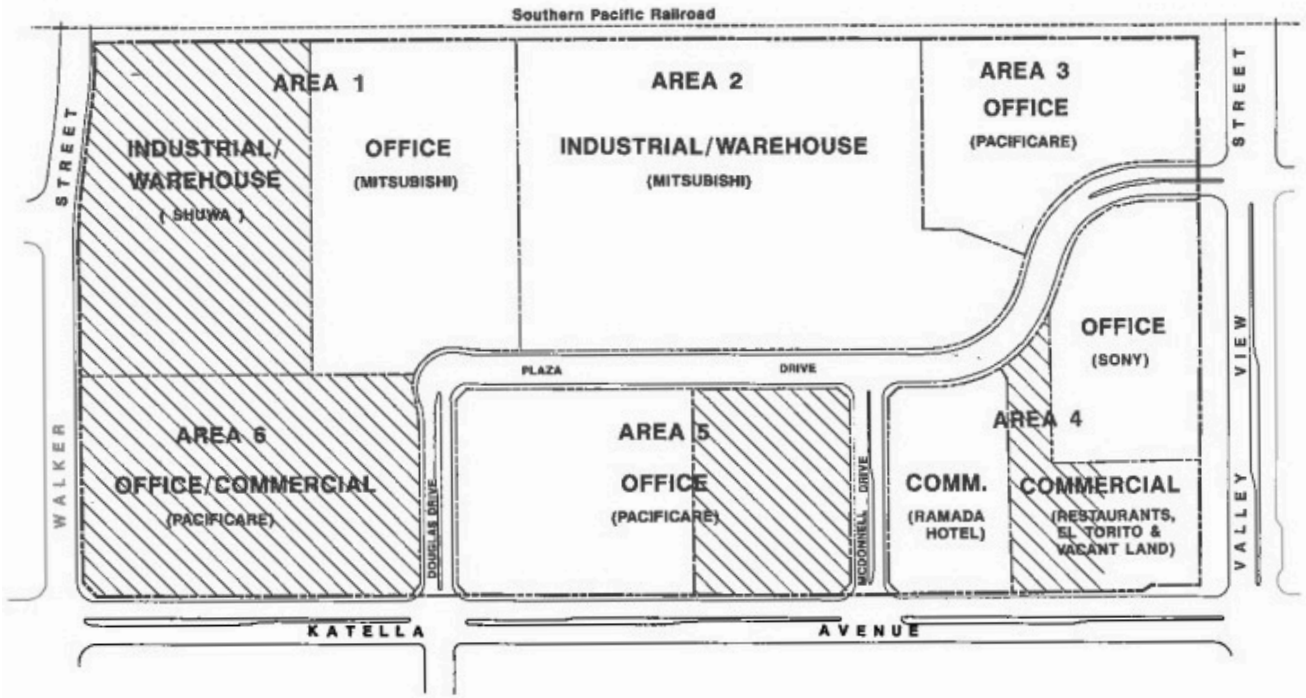
SOURCE: City of Cypress

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General Plan Land Use in the Project Area

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Area	Net Acres	Existing SF	Proposed SF	Ultimate Total
1	16.14	151,000	210,000	361,000
2	15.32	338,653	0	338,653
3	5.02	106,866	0	106,866
4	10.54	219,816	9,000	228,816
5	9.18	206,895	150,000	356,895
6	8.47	0	368,000*	368,000*
Total (net)	64.67	1,023,230	737,000	1,760,230
Roads	6.56			
Total (gross)	71.23	1,023,230	737,000	1,760,230

* Includes 10,000 square foot child care facility

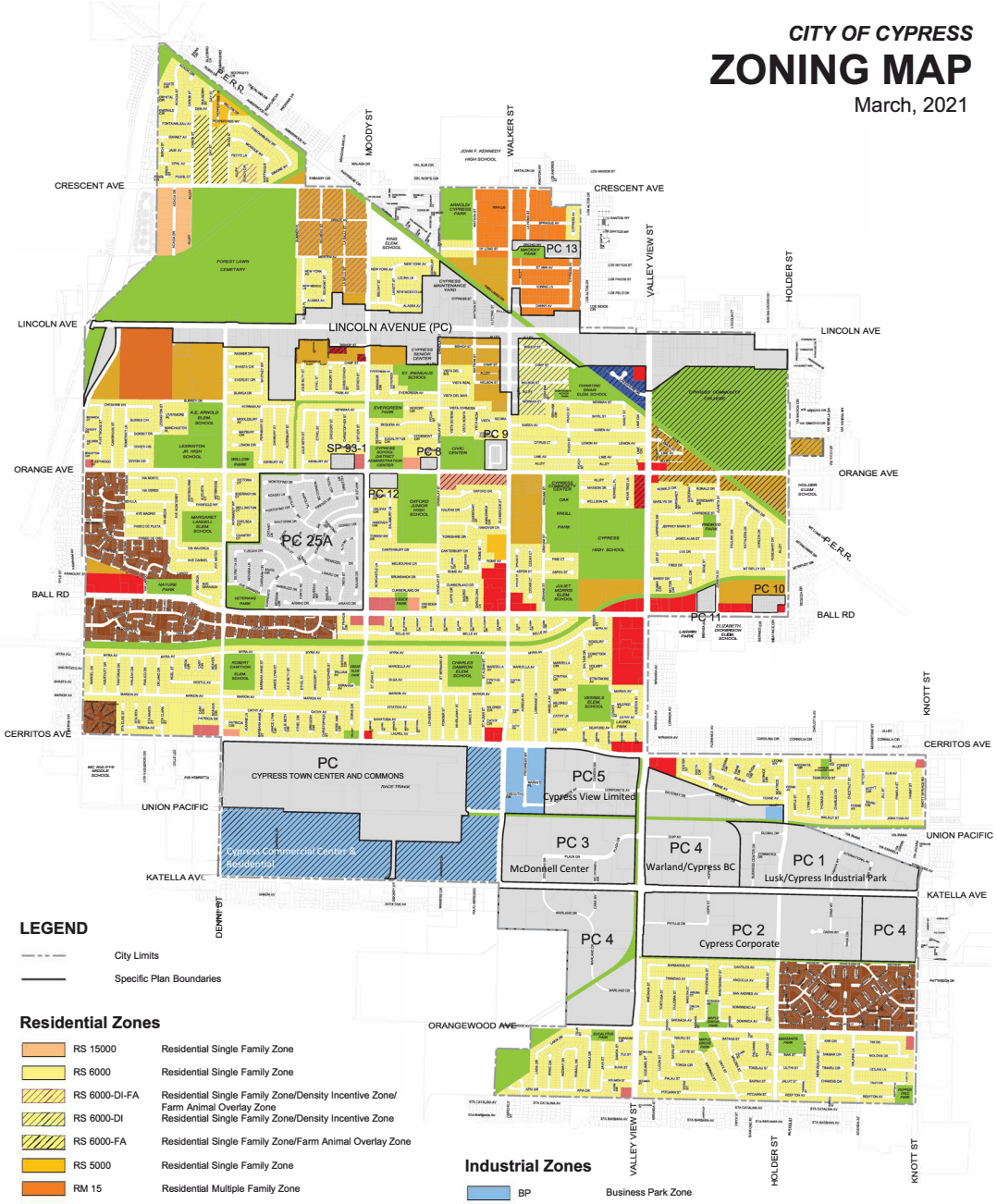
Approved Specific Plan (1982)	1,554,100 square feet
Proposed Specific Plan Amendment	1,760,230 square feet
Increase	206,130 square feet

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FIGURE 3.4

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FIGURE 3.5

NOT TO SCALE

SOURCE: City of Cypress

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5665 Plaza Drive Project Draft Environmental Impact Report

Existing Zoning Map

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With the exception of certain uses, the zoning ordinance defers to the specific plan in identifying permissible and conditionally permissible uses. The project site is in the PC-3, McDonnell Center Planned Community Zone, and applicable zoning is provided in the McDonnell Center Amended Specific Plan. The McDonnell Specific Plan Area is divided into six planning areas that are designated for industrial/warehouse, office, or commercial uses. The McDonnell Specific Plan also constitutes the zoning for the project site. In its existing condition Planning Area 1 currently includes light industrial uses in the western portion of the planning area and office uses in the eastern portion of the planning area. The project site is within the eastern portion of Planning Area 1 and is currently designated for general office uses. The proposed project would not include or require any amendments to the City's General Plan or City's Zoning Ordinance; however, the project does include a proposed amendment to the McDonnell Specific Plan to allow light industrial uses within the eastern portion of Planning Area 1, and removal of the maximum developable area requirement while retaining the 1.0:1 FAR to maintain consistency with the General Plan. Office uses would still be allowed within the eastern portion of Planning Area 1.

3.6 PROJECT CHARACTERISTICS

3.6.1 Project Objectives

The City has established the following intended specific objectives for the proposed project that would serve to aid decision-makers in their review of the proposed project and its associated environmental impacts:

1. To meet a greater market demand for state-of-the-art light industrial buildings by replacing a vacant office building.
2. To promote development that will attract new businesses to operate in the City.
3. To encourage business development that will generate a range of employment opportunities for the community.
4. To help attract new business enterprises that will result in a positive flow of revenue to the City.
5. To establish a use consistent with the business park and light industrial uses in proximity to the project site.

3.6.2 Project Characteristics

The proposed project includes the demolition of the existing five-story office building on the project site and the construction of a concrete tilt-up light industrial building with associated office and warehouse uses, inclusive of a second-story office mezzanine and attendant loading docks. The proposed building would be 191,394 square feet in size, and the project includes associated site improvements such as landscaping, surface parking, and utility improvements.

3.6.3 Site Design/Layout

The proposed project would include one new light industrial building with a truck loading area on the west side and surface automobile parking along the remaining sides of the proposed building. **Figure 3.6, Conceptual Site Plan**, shows the conceptual site plan for the proposed project. The proposed building is depicted in **Figure 3.7, Proposed Project Renderings**, and **Figure 3.8, Proposed Building Finishes**, presents the finishes for the proposed building.

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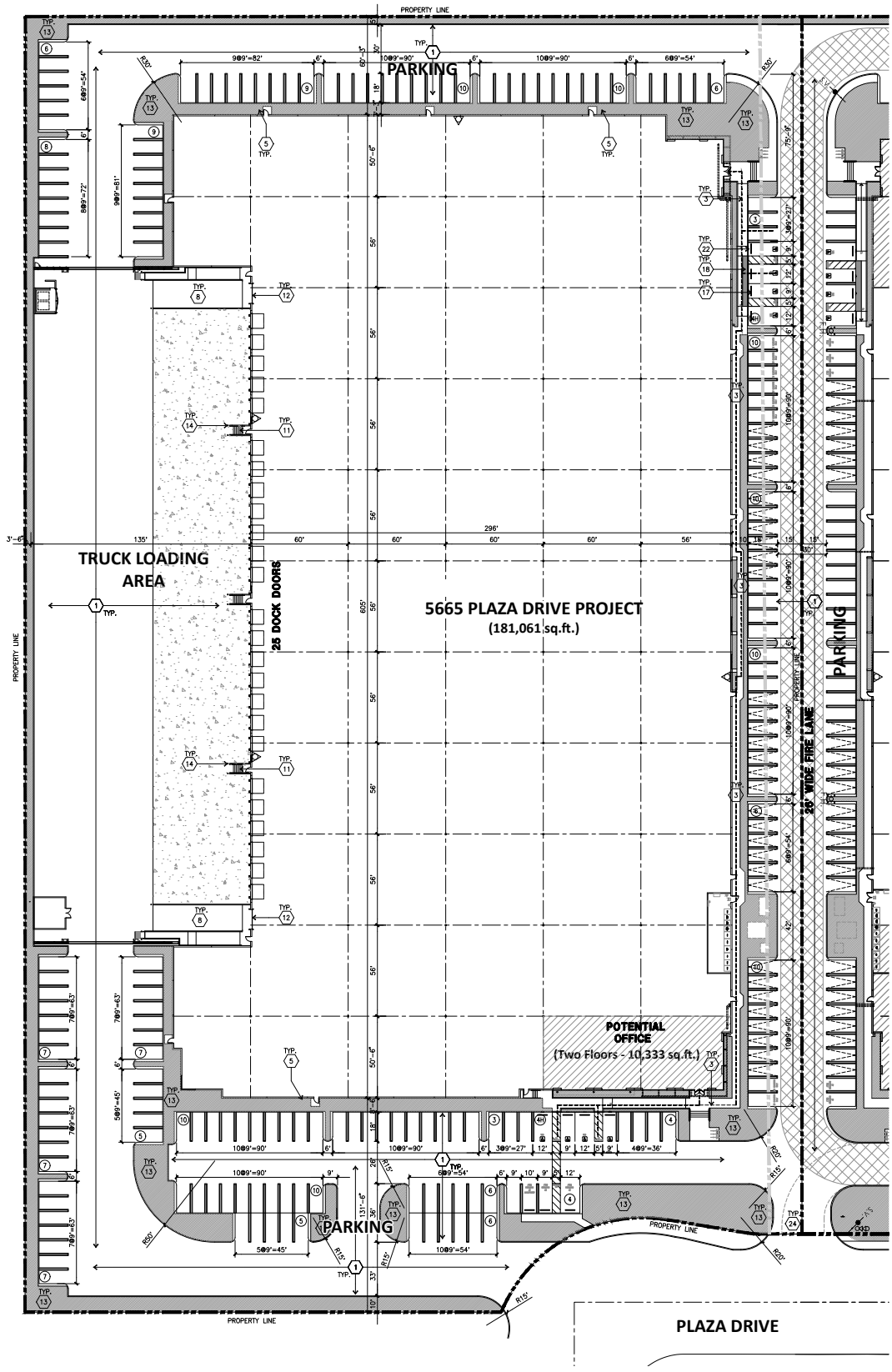


FIGURE 3.6

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SITE PLAN GENERAL NOTES

- CONCRETE PAVING – RE: CIVIL DRAWINGS THICKNESS
- STANDARD PARKING STALL 9' X 18'
- ACCESSIBLE PARKING STALL, 9'X18+5'W ACCESSIBLE AISLE
- VAN ACCESSIBLE 12'X18'+5'W ACCESSIBLE AISLE
- EV PARKING
- CLEAN AIR/VANPOOL/EV (PROVIDE CONDUIT FOR FUTURE EV CHARGING) STALL (9' X 18')
- EV AMBULATORY PARKING STALL (10' X 18')
- LIGHT STANDARD
- 26' WIDE FIRE LANE. PROVIDE RED CURBS AND SIGNAGE PER FIRE DEPT REQUIREMENT
- FIRE HYDRANT– APPROXIMATE LOCATION
- PROPERTY BOUNDARY

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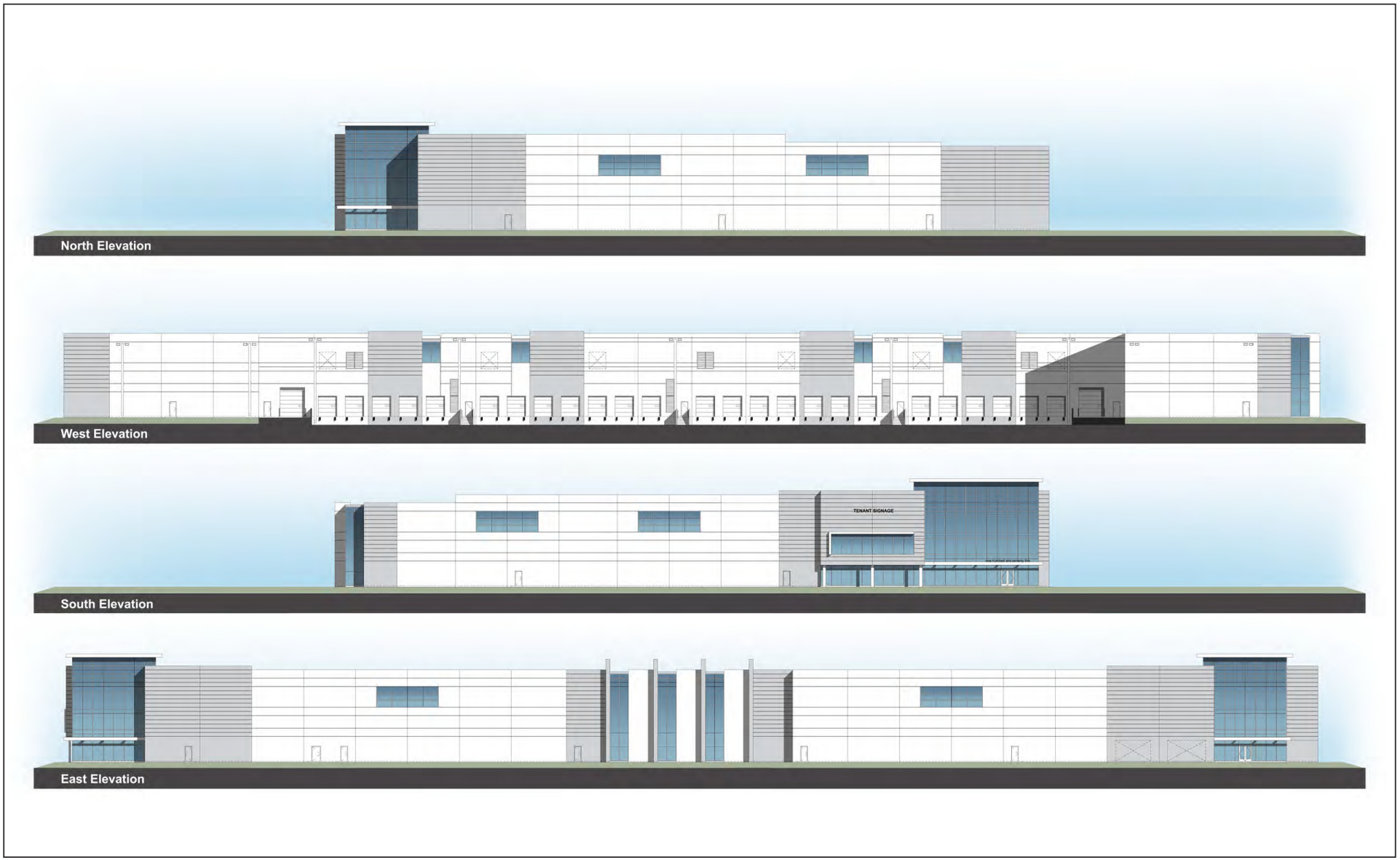
SOURCE: HPA

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Conceptual Site Plan

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FIGURE 3.7

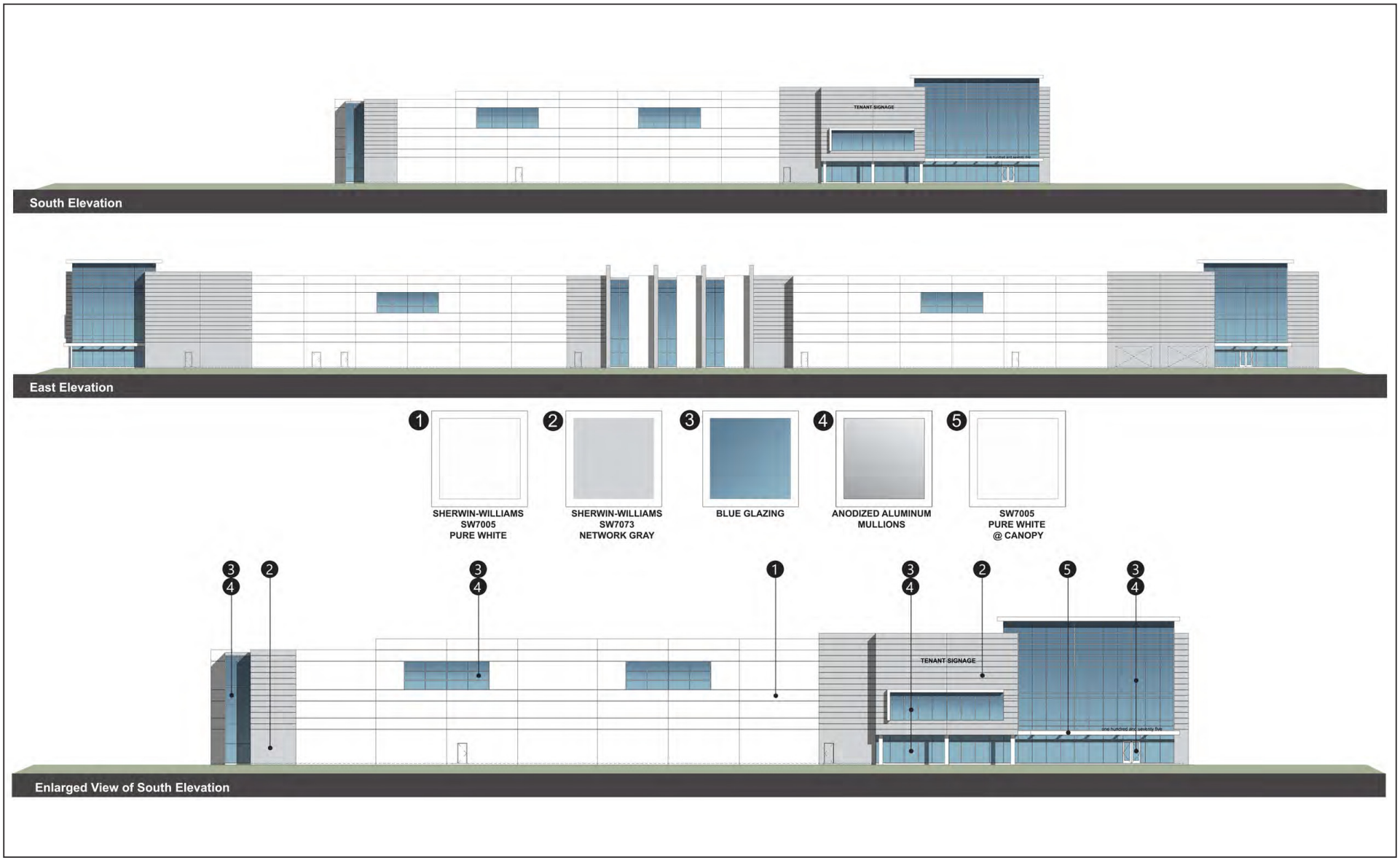
5665 Plaza Drive Project Draft Environmental Impact Report

Proposed Project Renderings

SOURCE: HPA

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FIGURE 3.8

5665 Plaza Drive Project Draft Environmental Impact Report

Proposed Building Finishes

SOURCE: HPA

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The proposed building would be 191,394 square feet in size, including 181,061 square feet of warehouse space and 10,333 square feet of office space (5,184 square feet on the first floor and 5,149 square feet on the second floor). The proposed office space would be located at the southeast corner of the building. The maximum building height would be approximately 51 feet, 6 inches, to the top of the parapet on the northeast and southeast corners of the building; however, the majority of the building would have a maximum height of 40 feet.

The proposed building would include a truck loading area with 25 dock-high loading doors on the west side of the building. The loading area would be recessed and not visible from the public right-of-way along Plaza Drive. Other than the truck loading area, surface parking, providing 206 parking stalls, and landscaped areas would generally surround the perimeter of the proposed building.

3.6.4 Operational Characteristics

The ultimate tenant has not been identified at this time; therefore, specific details about the future operation of the proposed building are not available. This analysis assumes that the proposed building would operate 24 hours per day, 7 days per week, depending on business and operational needs. Additionally, it is assumed that up to 100 percent of the warehouse space would be refrigerated, and that up to 100 percent of all trucks accessing the project site would have transport refrigeration units.

3.6.5 Access and Parking

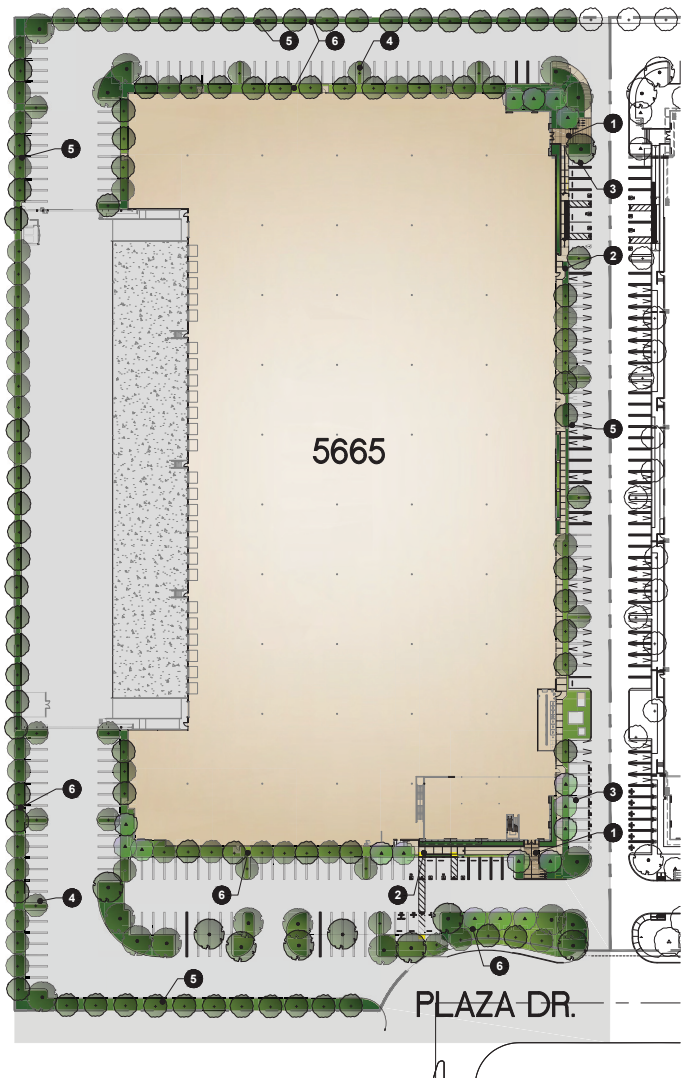
The project site is currently accessible from two driveways along Plaza Drive. The proposed project would relocate the driveway locations. The new westernmost driveway would be the primary truck access point and path to the truck-loading docks on the proposed building's west side. The eastern driveway would be a shared driveway with the parcel to the east.

A total of 206 surface parking stalls would be provided around the project site's perimeter, consisting of 156 standard stalls, 4 standard accessible parking stalls, 4, van accessible parking stalls, 11 electric vehicle charging stations (EVCS), and 31 electric vehicle supply equipment (EVSE) stalls.

3.6.6 Landscaping

The majority of on-site landscaping would be along the perimeter of the project site and within the surface parking lot. Trees and ornamental vegetation would border the project site on all sides. Additional landscaping would be provided near the eastern driveway from Plaza Drive, which would include enhanced landscaped areas and decorative paving. The proposed project would result in the removal and replacement of several trees. To the extent feasible, the proposed project would use drought-tolerant vegetation and non-invasive plantings, consistent with Chapter 29, Article I, Water Efficient Landscape Requirements, of the City's Municipal Code. Parking areas would feature landscaping consistent with Cypress Municipal Code Section 3.13.060, which requires that parking areas include landscaped buffer zones between parking areas and rights-of-way, and between parking areas and drive aisles. The landscaping plan for the proposed project is shown on **Figure 3.9, Proposed Project Landscaping Plan**.

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ONSITE PLANT SCHEDULE

TREES

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE / FORM	HT. X SPRD. X CAL. (MIN.)	WATER USE	DESCRIPTION
	LAGERSTROEMIA FAUERI 'TUSCARORA'	TUSCARORA CRAPE MYRTLE	24" BOX STD.	8'H X 5'W X 4"C	M	FLOWERING TREE
	LOPHOSTEMON CONFERTUS	BRISBANE BOX	24" BOX STD.	8'H X 5'W	M	EVERGREEN CANOPY
	TIPUANA TIPU	TIPU TREE	36" BOX STD.	14' H X 6'W	L	SEMIDECIDUOUS BROAD CANOPY

SHRUBS, GRASSES, & GROUNDCOVERS

SYMBOL	KEY	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WATER USE	DESCRIPTION
	AGA VIL	AGAVE VILMORINIANA	OCTOPUS AGAVE	15 GAL.	60" O.C.	L	ACCENT SUCCULENT
	ALO BE	ALOE 'BLUE ELF'	BLUE ELF ALOE	1 GAL.	24" O.C.	L	ACCENT SUCCULENT
	CAL LJ	CALLISTEMON 'LITTLE JOHN'	LITTLE JOHN BOTTLE BRUSH	5 GAL.	36" O.C.	L	MIDGROUND FLOWERING SHRUB
	CAR GC	CARISSA M. 'GREEN CARPET'	DWARF NATAL PLUM	1 GAL.	30" O.C.	L	EVERGREEN LOW SHRUB
	CAR DIV	CAREX DIVULSA	BERKELEY SEDGE	1 GAL.	24" O.C.	L	ORNAMENTAL GRASS
	DIA LR	DIANELLA 'LITTLE REV'	LITTLE REV FLAX LILY	1 GAL.	24" O.C.	L	UPRIGHT ACCENT
	DIA VAR	DIANELLA T. 'VARIEGATA'	VARIEGATED FLAX LILY	5 GAL.	36" O.C.	M	UPRIGHT ACCENT
	FES MAI	FESTUCA MAIREI	ATLAS FESCUE	1 GAL.	24" O.C.	L	ORNAMENTAL GRASS
	JUN PAT	JUNCUS PATENS	CALIFORNIA GRAY RUSH	1 GAL.	24" O.C.	L	MODULAR WETLAND PLANT
	LAN NG	LANTANA 'NEW GOLD'	NEW GOLD LANTANA	5 GAL.	36" O.C.	VL	FLOWERING LOW SHRUB
	MUH ET	MUHLENBERGIA 'EL TORO'	BULL RUSH	1 GAL.	36" O.C.	L	ORNAMENTAL GRASS
	OLE MON	OLEA 'MONTRA'	LITTLE OLLIE	5 GAL.	48" O.C.	L	LARGE SHRUB
	WES WG	WESTRINGIA 'WYNYABBIE GEM'	COAST ROSEMARY	5 GAL.	36" O.C.	L	EVERGREEN HEDGE
	CAL HAE	CALLIANDRA HAEMATOCEPHALA	RED POWDER PUFF	15 GAL.	15' O.C.	M	FLOWERING VINE

WATER USE KEY:
VL = VERY LOW WATER USE, L = LOW WATER USE, M = MODERATE WATER USE, H = HIGH WATER USE. WATER USE STATED IS PER 'WATER USE CLASSIFICATION OF LANDSCAPE SPECIES' (ALSO REFERRED TO AS WUCOLS IV) FOR THE CITY OF CYPRESS, CA.

EXISTING TREE DISPOSITION

EXISTING TREES REMOVED	157
NEW TREES PROPOSED	173

LEGEND

1. ENHANCED PAVING AT BUILDING ENTRY
2. CONCRETE WALKWAYS
3. PROPOSED ACCENT TREES
4. PROPOSED PARKING TREES
5. PROPOSED SCREEN TREES
6. DROUGHT TOLERANT LANDSCAPE

EXISTING PLANT SCHEDULE

TREES

SYMBOL	BOTANICAL NAME	COMMON NAME
	PLATANUS ACERFOLIA	LONDON PLANE
	ERYTHRINA CAFFRA	CORAL
	LOPHOSTEMON CONFERTUS	BRISBANE BOX

NOTE: THE LETTER (E) NEXT TO A TREE SYMBOL INDICATES AN EXISTING TREE TO BE PROTECTED IN PLACE. THE LETTER (R) INDICATES AN EXISTING TREE TO BE REMOVED FROM SITE.

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FIGURE 3.9

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SOURCE: HPA

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5665 Plaza Drive Project Draft Environmental Impact Report

Proposed Project Landscaping Plan

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3.6.7 Utilities and Drainage

New water and sewer lines would be constructed on site and would connect to the existing water lines and sewer mains within Plaza Drive. An underground stormwater chamber, allowing for capture and treatment of stormwater that falls on the project site, would be constructed beneath the truck loading area along the west side of the building. The stormwater chamber would be approximately 8 feet wide and 403 feet long and extend approximately 8 feet in depth. The electrical utilities for the project site would be provided by Southern California Edison (SCE) and connect to existing infrastructure in the public right-of-way along Plaza Drive adjacent to the project site. Solid waste services would be provided by Valley Vista Services of Orange County.

The proposed project would be required to comply with all federal, State, and local regulations related to drainage and water quality. After project grading and construction, the proposed project would increase the impervious surface area on the project site by 28,374 square feet.

3.6.8 Project Design Features

The proposed project would be designed to comply with the water efficiency and energy conservation requirements included in the California Building Standards Code (California Code of Regulations [CCR], Title 24). Building features necessary to achieve Leadership in Energy and Environmental Design (LEED) Certified would be incorporated.

3.6.9 Construction Schedule

Development of the proposed project would require the demolition of the existing structure on the site, excavation and grading of the site, delivery of materials and personnel, construction of the building and parking areas, and landscaping of the project site. Construction of the proposed project would take place in a single phase. Demolition is anticipated to take 60 days, and construction is anticipated to take approximately 10 months. Construction is tentatively anticipated to begin in October 2024 and end in July 2025. Construction is expected on weekdays between the hours of 7:00 a.m. and 5:00 p.m. Per Section 13-70 of the City's Municipal Code, Special Provisions, construction is permitted within the City between 7:00 a.m. and 8:00 p.m. on weekdays, and 9:00 a.m. and 8:00 p.m. on Saturdays. No noise-generating construction activities are permitted on Sundays or federal holidays.

Based on the preliminary grading plans, approximately 940 cubic yards of material would need to be exported from the project site. Demolition, grading, and building activities would involve the use of standard earthmoving equipment such as excavators, loaders, bulldozers, cranes, and other related equipment.

All construction equipment and materials, including construction employees' personal motor vehicles, would be staged on site or on adjacent property directly east of the project site.

3.6.10 Discretionary Actions and Non-Discretionary Permits/Approvals

The City is the Lead Agency and has principal authority and jurisdiction over all land use entitlements within its incorporated boundaries. The proposed project would require the following discretionary approvals by the City:

- The City Council would certify that the Final EIR addresses the potential environmental effects of the proposed project and identifies appropriate mitigation measures to address any potentially significant effects;

- Specific Plan Amendment to the McDonnell Center Specific Plan to allow light industrial uses in the eastern portion of Planning Area 1, and removal of the maximum developable area requirement while retaining the 1.0:1 floor area ratio (FAR) to maintain consistency with the General Plan; and

- Site plan approval.

Other non-discretionary actions anticipated to be taken by the City and additional agencies at the staff level as part of the proposed project include, but are not limited to, the actions detailed in **Table 3.1**, below.

Table 3.1: Non-Discretionary Permits/Approvals

Agency	Permit/Approval
City of Cypress Community Development Department	Demolition, building, and grading permits
State Water Resources Control Board (SWRCB)	Waste Discharge Identification Number (WDID) for the *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities* (Order No. 2022-0057-DWQ, National Pollutant Discharge Elimination System (NPDES) No. CAS000002)
Santa Ana Regional Water Quality Control Board (RWQCB) (Region 8)	Waste Discharge Identification Number (WDID) for the General Waste Discharge Requirements for Discharge to Surface Waters that Pose an Insignificant (*De Minimis*) Threat to Water Quality (Order No. R8-2020-0006-057 NPDES No. CAG998001)
Orange County Fire Authority (OCFA)	Plan Approval, including emergency access and fire water supply
City of Cypress Community Development Department	Lot line adjustment to move the project site's eastern property line approximately 20 feet east

4.0 EXISTING SETTING, ENVIRONMENTAL ANALYSIS, IMPACTS, AND MITIGATION MEASURES

OVERVIEW OF ENVIRONMENTAL SETTING

State CEQA Guidelines Section 15125 requires an EIR to include a short description of the physical environmental conditions in the vicinity of a project. This section provides a short description of existing conditions in the proposed project's physical setting. More detailed descriptions of existing conditions focused on each environmental resource are provided in the subsequent sections. A discussion of cumulative impacts is also required. This chapter identifies a list of past, present, and reasonably foreseeable probable future projects that when considered with the proposed project could result in cumulative impacts. More detailed discussions of cumulative impacts focused on each environmental resource are provided in the subsequent sections.

Regional Setting

As discussed in Chapter 3.0, Project Description, of this EIR, the project site is in the southern part of the city of Cypress, in northwestern Orange County, California. The project site is north of the intersection of Plaza Drive and Douglas Drive. As shown on **Figure 3.1: Regional and Project Site Location**, regional access to the project site is provided via SR-22, located approximately 2.2 miles south of the project site, SR-91, located approximately 3.5 miles north of the project site, I-605 or the San Gabriel River Freeway, located approximately 2.2 miles west of the project site, and I-5, located approximately 4.75 miles northeast of project site.

Project Site Setting

Figure 3.2: Aerial Photograph and Surrounding Land Uses, depicts the project site in a local setting. The project site is approximately 8.5 acres and is currently developed with a 150,626-square-foot, five-story office building, a surface parking lot, and ornamental landscaping. As of May 2024, the existing office building was vacant and had no tenants. Historically, the project site was in agricultural production until the existing building was constructed in the late 1980s.

The project site is located in a largely developed portion of the City of Cypress within the McDonnell Specific Plan that consists of numerous office/light industrial uses. The project site is bounded by industrial and office uses to the north, industrial uses to the west, Plaza Drive to the south, and the Goodman Commerce Center Project to the east. The Goodman Commerce Center Project, approved in April 2023, was under construction at the time of the preparation of this EIR.

Pedestrian access to the project site is provided by way of sidewalks along the left side of Douglas Drive/Plaza Drive from Katella Avenue to the current driveway. There are no sidewalks along Plaza Drive east of the project site. Vehicular access to the project site is provided via an existing driveway at 5665 Plaza Drive and a shared driveway at the adjacent property at 5775 Plaza Drive. Local access to the project site is provided via Plaza Drive. The project site is currently served by existing water, sewer, and dry utilities along Plaza Drive.

The project site is located on a single parcel, Assessor Parcel Number (APN) 241-101-25.

CHAPTER FORMAT

This chapter contains eight sections, and each section addresses one environmental topic identified in Appendix G to the State CEQA Guidelines. For each environmental topic issue analyzed, the EIR includes a detailed explanation of the existing conditions, thresholds of significance that will be applied to determine whether the project's impacts are significant or less than significant, analysis of the environmental impacts, and a determination of whether the project would have a significant impact if implemented. A "significant impact" or "significant effect" means "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora fauna, ambient noise, and object of aesthetic significance. An economic or social change by itself shall not be considered to be a significant effect on the environment." (State CEQA Guidelines Section 15382). Each environmental topic section in this chapter includes a discussion of the cumulative effects of the project when considered in combination with other projects, as required by State CEQA Guidelines Section 15130.

Each of the sections is organized into eleven subsections, as follows:

- **Introduction** briefly describes the topics and issues covered in the section.
- **Scoping Process** describes the number and a brief description of comments received from the public during the public scoping period.
- **Methodology** describes the approach and methods employed to complete the environmental analysis for the issue under investigation.
- **Existing Environmental Setting** describes the relevant physical conditions that exist at the time of the issuance of the Notice of Preparation (NOP) that may influence or affect the issue under investigation. This section focuses on physical site characteristics that are relevant to the environmental topic being analyzed.
- **Regulatory Setting** lists and discusses the laws, ordinances, regulations, plans, and policies that relate to the specific environmental topic and how they apply to the proposed project.
- **Thresholds of Significance** sets forth the thresholds that are the basis of the conclusions regarding significance, which are primarily the criteria in Appendix G to the State CEQA Guidelines and the City of Cypress Initial Study/Environmental Checklist, General Plan, or Zoning Code.
- **Project Impacts** describes the potential environmental changes to the existing physical conditions that may occur if the proposed project is implemented. Evidence is presented to show the cause-and-effect relationship between the proposed project and potential changes in the environment. In accordance with State CEQA Guidelines Section 15126.2(a), this EIR is required to "identify and focus on the significant environmental effects" of the proposed project. The magnitude, duration, extent, frequency, and range or other parameters of a potential impact are ascertained to the extent feasible to determine whether impacts may be significant. In accordance with CEQA, potential project impacts, if any, are classified as follows for each of the environmental topics discussed in this EIR.

- **Significant and Unavoidable Impact:** If the proposed project is approved with significant and unavoidable impacts, the decision-making body is required to adopt a statement of overriding considerations pursuant to State CEQA Guidelines Section 15093 explaining why the project benefits outweigh the unavoidable adverse environmental effects caused by those significant and unavoidable environmental impacts.
- **Less Than Significant with Mitigation Incorporated:** This classification refers to potentially significant environmental impacts that can be feasibly mitigated to a level of insignificance. If the proposed project is approved, the decision-making body is required to make findings pursuant to State CEQA Guidelines Section 15091 that significant impacts have been mitigated to the extent feasible through implementation of mitigation measures.
- **Less Than Significant Impact:** Less than significant impacts are environmental impacts that have been identified but are not potentially significant. No mitigation is required for less than significant impacts.
- **No Impact:** A "no impact" determination is made when the proposed project is found to have no environmental impact.

- **Level of Significance Prior to Mitigation** summarizes the potentially significant impacts of the project, if any, prior to mitigation.
- **Regulatory Compliance Measures and Mitigation Measures** describes relevant and applicable laws or regulations that must be adhered to with respect to the construction and/or operation of the proposed project and would reduce or lessen potential impacts related to a particular issue area and identifies project-specific measures that avoid, minimize, rectify, reduce, eliminate, or compensate for a potentially significant impact.
- **Level of Significance after Mitigation** describes the significance of potential impacts after implementation of mitigation measures. Potential significant unavoidable impacts are clearly stated in this section.
- **Cumulative Impacts** refers to potential environmental changes to the existing physical conditions that may occur as a result of project implementation together with all other reasonably foreseeable, planned, and approved future projects in the vicinity of the project site that produce related impacts. State CEQA Guidelines Section 15355 defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Cumulative impacts may result from individually minor but collectively significant projects taking place over a period of time. Projects that have progressed to the stage where CEQA review has been initiated are normally treated as foreseeably probable future projects. For each of the environmental topics considered in this EIR, the geographic scope of the cumulative analysis is defined.

THRESHOLDS OF SIGNIFICANCE

The threshold questions used in this EIR are consistent with Appendix G of the State CEQA Guidelines.

EFFECTS EVALUATED IN THIS EIR

The discussion of potential effects is presented by environmental resource area in this EIR. As part of the Initial Study (Appendix B) prepared for the proposed project, the following environmental issues were considered but no adverse impacts were identified. Furthermore, no new information identifying potentially significant impacts to these resources was presented during the scoping process. As a result, there is no further discussion of the following issues in the EIR:

- Aesthetics
- Agriculture and Forestry Resources
- Biological Resources
- Hazards & Hazardous Materials
- Hydrology/Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems
- Wildfire

CUMULATIVE DEVELOPMENT

In accordance with State CEQA Guidelines Section 15130, cumulative impacts are anticipated impacts of the proposed project along with reasonably foreseeable growth. Reasonably foreseeable growth may be based on either:

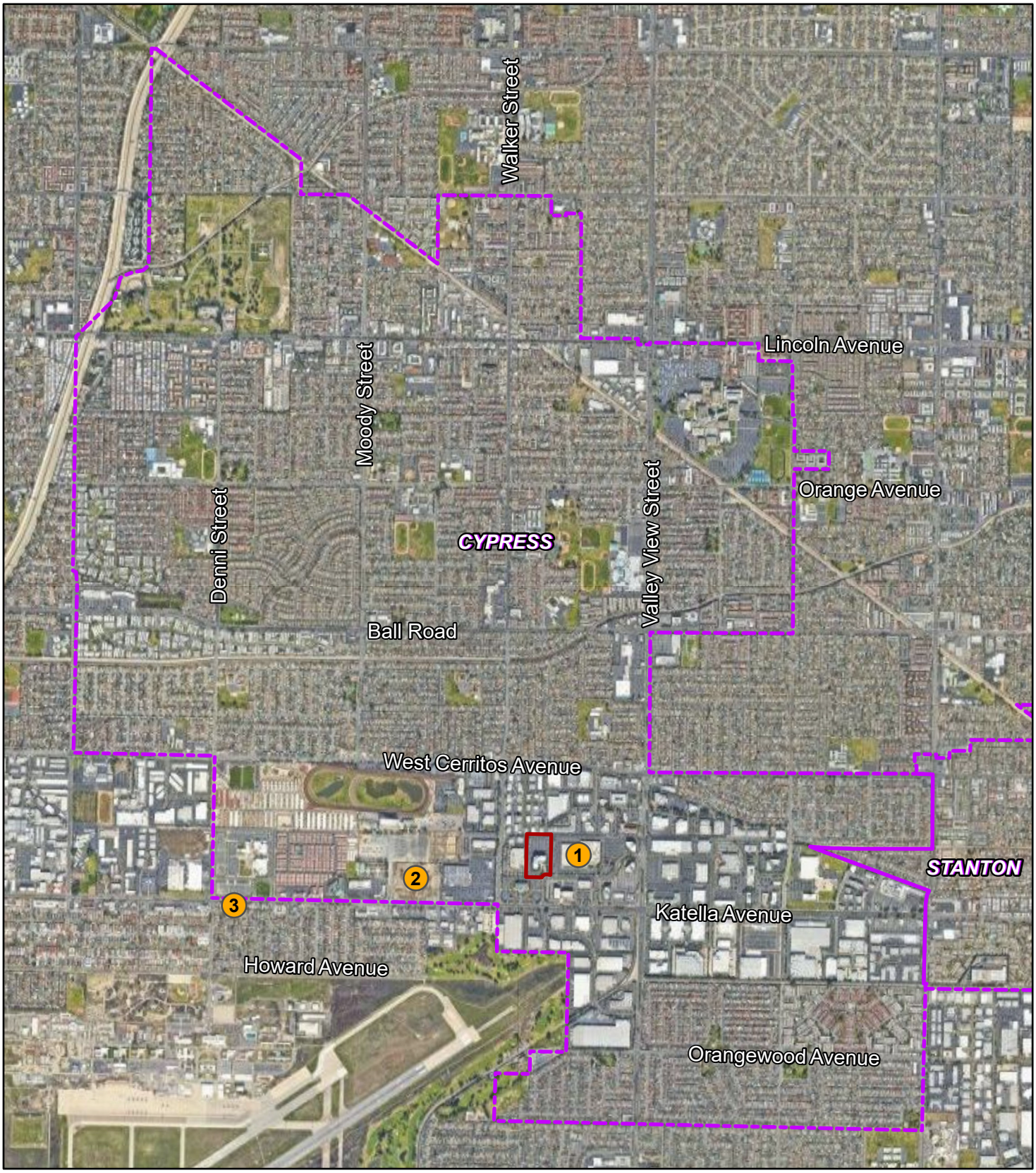
- A list of past, present, and reasonably foreseeable probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or

- A summary of projections contained in the adopted General Plan or related planning document, or in a prior environmental document that has been adopted or certified, and that described or evaluated regional or areawide conditions contributing to the cumulative impact.

Table 4.1, below, presents a list of past, present, and reasonably foreseeable probable future projects (cumulative projects) considered in the evaluation of potential cumulative impacts for this EIR. As stated above, an analysis of the cumulative impacts associated with these related projects and the proposed project is provided in the cumulative impacts discussion under each individual impact category in Chapter 4.0.

For purposes of identifying projects with potential for cumulative impacts, a list of past, present, and reasonably foreseeable probable future projects was developed. As shown in **Table 4.1**, the projects include various land uses, such as residential, commercial, and industrial uses.

The locations of the related projects are shown on **Figure 4.1: Cumulative Projects**. Although some projects on the list have been completed since issuance of the NOP, they remain on the list because they are part of the cumulative analysis for the EIR.



LSA

Project Site
City Boundary
Related Projects

FIGURE 4.1

N

0 1200 2400
FEET

SOURCE: Google Maps (2023)

5665 Plaza Drive Project Draft Environmental Impact Report
Cumulative Projects

J:\CCP2201.04\GIS\Pro\Cypress 5665 Plaza Drive Project\Cypress 5665 Plaza Drive Project.aprx (5/28/2024)

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Table 4.1: Summary of Cumulative Projects

Project No.	Project Name	Location	Status	Project Description
City of Cypress				
1	Goodman Commerce Center[7]	5757 Plaza Drive	Under construction as of 2024	204,909-square-foot office/ warehouse building 185,359-square-foot office/ warehouse building
2	Cypress Town Center	10727 Champions Lane	Under construction as of 2024	Multifamily apartments 135 du (condominiums and townhomes)
3	Cypress City Center (The Square)	Northwest corner of Winners Circle and Katella Avenue	Under construction as of 2024	251 du apartments 20,800-square-foot retail 120-room hotel 10-screen multiplex movie theater

du = dwelling unit
sf = square foot/feet

It is noted that some of the cumulative projects may not be completed in 2025 (the proposed project's anticipated buildout year), may never be built, or may be approved and built at reduced densities. However, to provide a conservative forecast, the future baseline forecast assumes that all of the related projects will be fully built out by 2025.

The discussion of cumulative impacts "should be guided by the standards of practicality and reasonableness" (*Environmental Protection Info. Center v. Department of Forestry & Fire Protection* (2008) 44 Cal.4th 459, 524). A proposal that has not crystallized to the point that it would be reasonable and practical to evaluate its cumulative impacts need not be treated as a probable future project (*City of Maywood v. Los Angeles Unified School District* (2012) 208 Cal.App.4th 362, 397).

Rather, a potential future project qualifies for inclusion in an analysis of cumulative impacts only to the extent the future project is "both probable and sufficiently certain to allow for meaningful cumulative impact analysis" (*Id.* at 398; see *City of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal.App.4th 889, 902 [when "review[ing] the agency's decision to include information in the cumulative impacts analysis[,] ... [w]e determine whether inclusion was reasonable and practical"]).

[7] The Goodman Commerce Center project, even though it has the same project proponent as the proposed project, is an independent, cumulative project. The proposed project is on a separate parcel and is not a reasonably foreseeable consequence of the Goodman Commerce Center project. (*McCann v. City of San Diego* (2021) 70 Cal.App.5th 51, 85 [city could separately consider different utility undergrounding projects because each project was separately approved and independently functional of the other projects]; *Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1222 [no piecemealing because project was not a "reasonably foreseeable consequence" of another project].) The Goodman Commerce Center project was designed to function as an independent development, with all required public and private improvements (such as internal accessways and driveways). It did not necessitate or compel the proposed project. (*Aptos Council v. County of Santa Cruz* (2017) 10 Cal.App.5th 266, 280 ["when each action has independent utility and does not subsume or necessitate each other, the actions may properly undergo separate environmental review"].) The proposed project can likewise function independently and proposes all necessary on-site and off-site improvements needed to ensure proper operation of the proposed 191,394-square-foot light industrial building.

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4.1 AIR QUALITY

This section describes the potential air quality impacts for the proposed 5665 Plaza Drive Project (proposed project) using methodologies and assumptions recommended in the air quality impact assessment guidelines of the South Coast Air Quality Management District (SCAQMD) *California Environmental Quality Act (CEQA) Air Quality Handbook,*[8] and associated updates. In keeping with these guidelines, this section of the Draft EIR describes the regulatory setting, existing air quality in the proposed project area, and describes short-term impacts during construction, long-term impacts associated with operations, and potential impacts to human health. The air quality modeling data used for this analysis is provided in **Appendix C** to this Draft EIR.

4.1.1 Scoping Process

The City received 3 comment letters during the public review period for the NOP. For copies of the NOP comment letters, refer to **Appendix A** of this EIR. Two comment letters included comments related to Air Quality.

The letter from The City of Los Alamitos received on June 5, 2024, suggested that the Draft EIR should evaluate the proposed project's impact on air quality from the proposed change in land use.

The Letter from Warland Investments Company and Affiliated Entities received on June 5, 2024, suggest that the proposed project has a foreseeable potential use as a logistics center, stating that logistics centers contribute to excessive air pollution when compared to typical warehouse projects. Additionally, in a previous letter dated March 7, 2024, which was included as an attachment in the June 5, 2024, letter, Warland states their concerns regarding the short and long-term impacts to air quality in surrounding areas due to the proposed cumulative redevelopment of 5665 Plaza Drive. The Letter also stated that the proposed project does not consider the air quality impacts of refrigerated trucks accessing the project site and also fails to evaluate off-site air quality impacts.

4.1.2 Regulatory Setting

The applicable federal, State, regional, and local regulatory framework is discussed below.

4.1.2.1 Federal Regulations

Clean Air Act (CAA) (42 U.S.C. §§ 7401-7671q), was largely enacted in 1970 and subsequently amended in 1977, and 1990. The CAA establishes federal air quality standards for six pollutants, ("criteria pollutants"). These criteria pollutants include carbon monoxide (CO), ozone (O_3), particulate matter 10 microns in diameter and less (PM_{10}), particulate matter 2.5 microns and less ($PM_{2.5}$), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead (Pb). The federal air quality standards are known as the National Ambient Air Quality Standards (NAAQS). The CAA charges the U.S. Environmental Protection Agency (USEPA) with setting and enforcing the NAAQS for criteria pollutants. The NAAQS also include dates by which compliance must be achieved.

[8] South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook.* Website: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook- (1993), (accessed May 13, 2024).

Areas of the United States that have met the NAAQS are described as being in "attainment." Areas that have not achieved the NAAQS are described as being in "nonattainment." Areas that were previously in nonattainment but have since achieved the NAAQS are described as being in "maintenance." The CAA requires each state that has not met the NAAQS to prepare an air quality control plan referred to as a State Implementation Plan (SIP) demonstrating how the State will achieve the NAAQS. SIPs are periodically modified to reflect the latest emissions inventories, planning documents, and rules and regulations of their subject air basins as reported by their jurisdictional agencies. The USEPA has responsibility to review every State's SIP to determine conformity with the mandates of the CAA and determine if implementation would achieve air quality goals. If the USEPA determines a SIP to be inadequate, a Federal Implementation Plan may be prepared for the nonattainment area, which imposes additional control measures. Failure to submit an approvable SIP or to implement the plan within the mandated timeframe may result in sanctions on transportation funding and stationary air pollution sources in the air basin.

The CAA Amendments of 1990 identified specific emission reduction goals for areas not achieving the NAAQS. The amendments included additional requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution, as well as requirements for States to demonstrate reasonable progress towards meeting the NAAQS and sanctions for failure to meet certain milestones in achieving the NAAQS.

The USEPA is also required to develop National Emission Standards for Hazardous Air Pollutants (HAPs), which are defined as pollutants which may reasonably be anticipated to result in increased deaths or serious illness, and which are not already regulated. An independent science advisory board reviews the health and exposure analyses conducted by the USEPA on suspected hazardous pollutants prior to regulatory development.

4.1.2.2 State Regulations

California Clean Air Act (CCAA)(Assembly Bill 2595). Enacted in 1988, the CCAA requires all air quality districts in the State develop air quality plans and authorizes air quality districts to implement transportation control measures. The CCAA charges the California Air Resources Board (CARB) with implementation of the CCAA, regulating emissions from consumer products and motor vehicles, and responding to the requirements of the federal CAA. The CCAA mandates achievement of emissions reductions to the maximum degree possible to achieve and maintain the California Ambient Air Quality Standards (CAAQS). The CAAQS set standards for the same criteria pollutants for which NAAQS have been established as well as sulfates (SO_4^{2-}), visibility reducing particles, hydrogen sulfide (H_2S), and vinyl chloride (C_2H_3Cl). **Table 4.1.1** presents the NAAQS and CAAQS.

The project site is located in the South Coast Air Basin (Basin) under the authority of the SCAQMD. The CCAA endows local air quality management districts with authority to regulate air emissions from stationary sources, including commercial and industrial facilities, and mandates that air quality districts focus particular attention on reducing emissions from transportation and area-wide emission sources. Each district with areas in nonattainment are required to adopt air quality management plans (AQMPs) to achieve a 5 percent annual reduction, averaged over consecutive 3-year periods, in district-wide emissions of each nonattainment pollutant or its precursors. An AQMP shows how a district would reduce emissions to achieve air quality standards. Generally, the State standards for these pollutants are more stringent than the national standards.

Table 4.1.1: Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards [1]		Federal Standards [2]		
		Concentration [3]	Method [4]	Primary [3,5]	Secondary [3,6]	Method [7]
Ozone (O_3)[8]	1-Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	–	Same as Primary Standard	Ultraviolet Photometry
	8-Hour	0.07 ppm (137 µg/m^3)		0.070 ppm (137 µg/m^3)		
Respirable Particulate Matter (PM_{10})[9]	24-Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		–		
Fine Particulate Matter ($PM_{2.5}$)[9]	24-Hour	–		35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	9.0 µg/m^3	15.0 µg/m3	
Carbon Monoxide (CO)	8-Hour	9.0 ppm (10 mg/m^3)	Non-Dispersive Infrared Photometry (NDIR)	9 ppm (10 mg/m^3)	–	Non-Dispersive Infrared Photometry (NDIR)
	1-Hour	20 ppm (23 mg/m^3)		35 ppm (40 mg/m^3)		
	8-Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		–	–	
Nitrogen Dioxide (NO_2)[10]	Annual Arithmetic Mean	0.03 ppm (57 µg/m^3)	Gas Phase Chemi-luminescence	53 ppb (100 µg/m^3)	Same as Primary Standard	Gas Phase Chemi-luminescence
	1-Hour	0.18 ppm (339 µg/m^3)		100 ppb (188 µg/m^3)	–	
Lead (Pb)[12,13]	30-Day Average	1.5 µg/m^3	Atomic Absorption	–	–	High-Volume Sampler and Atomic Absorption
	Calendar Quarter	–		1.5 µg/m^3 (for certain areas)[i]	Same as Primary Standard	
	Rolling 3-Month Average [i]	–		0.15 µg/m^3		
Sulfur Dioxide (SO_2)[11]	24-Hour	0.04 ppm (105 µg/m3)	Ultraviolet Fluorescence	0.14 ppm (for certain areas)	–	Ultraviolet Fluorescence; Spectro-photometry (Pararosaniline Method)
	3-Hour	–		–	0.5 ppm (1300 µg/m^3)	
	1-Hour	0.25 ppm (655 µg/m^3)		75 ppb (196 µg/m^3)[11]	–	
	Annual Arithmetic Mean	–		0.030 ppm (for certain areas)[11]	–	
Visibility-Reducing Particles [12]	8-Hour	See footnote [14]	Beta Attenuation and Transmittance through Filter Tape	No Federal Standards		
Sulfates	24-Hour	25 µg/m^3	Ion Chromatography			
Hydrogen Sulfide	1-Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride [10]	24-Hour	0.01 ppm (26 µg/m^3)	Gas Chromatography			

Source: Ambient Air Quality Standards (California Air Resources Board 2024).
Notes on following page.

[1] California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1- and 24-hour), nitrogen dioxide, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[2] National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact USEPA for further clarification and current national policies.

[3] Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[4] Any equivalent measurement method which can be shown to the satisfaction of the CARB to give equivalent results at or near the level of the air quality standard may be used.

[5] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

[6] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[7] Reference method as described by the USEPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the USEPA.

[8] On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[9] On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 µg/m^3 to 12.0 µg/m^3. In February 2024, the national annual $PM_{2.5}$ primary standard was lowered from 12 µg/m^3 to 9.0 µg/m^3; the secondary annual standard remained at 15 µg/m^3. The existing national 24- hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m^3, as was the annual secondary standard of 15 µg/m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

[10] To attain the 1-hour national standard, the three-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

[11] On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the three-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.
Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

[12] The CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[13] The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 µg/m^3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

[14] In 1989, the CARB converted both the general Statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the Statewide and Lake Tahoe Air Basin standards, respectively.

°C = degrees Celsius
µg/m^3 = micrograms per cubic meter
CARB = California Air Resources Board
mg/m^3 = milligrams per cubic meter
ppb = parts per billion
ppm = parts per million
USEPA = United States Environmental Protection Agency

4.1.2.3 Criteria Air Pollutants

As discussed above, both State and federal governments have established health-based ambient air quality standards for criteria air pollutants. Criteria pollutants are defined as those pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health.

As both the USEPA and the CARB have established ambient air quality standards for CO, O_3, NO_2, SO_2, Pb, and suspended particulate matter. In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. These ambient air quality standards are levels of contaminants that avoid specific adverse health effects associated with each pollutant.

Federal standards include both primary and secondary standards. Primary standards establish limits to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility, and damage to animals, crops, vegetation, and buildings.[9] The criteria pollutants are described in greater detail below.

Ozone. O_3 is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving ROG and NO_x. The main sources of ROG and NO_x, often referred to as ozone precursors, are combustion processes (including combustion in motor vehicle engines) and the evaporation of solvents, paints, and fuels. Automobiles are typically the largest source of ozone precursors. Ozone is referred to as a regional air pollutant because its precursors are transported and diffused by wind concurrently with ozone production through the photochemical reaction process. Ozone causes eye irritation, airway constriction, and shortness of breath and can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema.

Particulate Matter. Particulate matter is a class of air pollutants that consists of heterogeneous solid and liquid airborne particles from humanmade and natural sources. Particulate matter is categorized in two size ranges: PM_{10}, for particles less than 10 microns in diameter, and $PM_{2.5}$, for particles less than 2.5 microns in diameter. Motor vehicles are the primary generators of particulates, through tailpipe emissions as well as brake pad and tire wear, and entrained road dust. Wood burning in fireplaces and stoves, industrial facilities, and ground-disturbing activities such as construction are other sources of such fine particulates. These fine particulates are small enough to be inhaled into the deepest parts of the human lung and can cause adverse health effects. According to CARB, studies in the United States and elsewhere have demonstrated a strong link between elevated particulate levels and premature deaths, hospital admissions, emergency room visits, and asthma attacks, and studies of children's health in California have demonstrated that particle pollution may significantly reduce lung function growth in children.[10] Statewide attainment of

[9] United States Environmental Protection Agency (USEPA). 2017. Criteria Air Pollutants. October. Website: www.epa.gov/criteria-air-pollutants (accessed May 13, 2024).

[10] California Air Resources Board (CARB). 2020. *Inhalable Particulate Matter and Health ($PM_{2.5}$ and PM_{10})*. Website: ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health (accessed May 13, 2024).

particulate matter standards could reduce premature deaths, hospital admissions for cardiovascular and respiratory disease, asthma-related emergency room visits, and episodes of respiratory illness in California.

Carbon Monoxide. CO is an odorless, colorless gas usually formed as the result of the incomplete combustion of fuels. The single largest source of CO is motor vehicles. CO transport is limited – it disperses with distance from the source under normal meteorological conditions. However, under certain extreme meteorological conditions, CO concentrations near congested roadways or intersections may reach unhealthful levels that adversely affect local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients). Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. Exposure to high concentrations of CO reduces the oxygen-carrying capacity of the blood and can cause headaches, nausea, dizziness, and fatigue, impair central nervous system function, and induce angina (chest pain) in persons with serious heart disease. Extremely high levels of CO, such as those generated when a vehicle is running in an unventilated garage, can be fatal.

Nitrogen Dioxide. NO_2 is a reddish-brown gas that is a byproduct of combustion processes. Automobiles and industrial operations are the main sources of NO_2. Aside from its contribution to ozone formation, NO_2 also contributes to other pollution problems, including a high concentration of fine particulate matter, poor visibility, and acid deposition. NO_2 may be visible as a coloring component on high pollution days, especially in conjunction with high ozone levels. NO2 decreases lung function and may reduce resistance to infection.

Sulfur Dioxide. SO_2 is a colorless, acidic gas with a strong odor. It is produced by the combustion of sulfur-containing fuels such as oil, coal, and diesel. SO_2 has the potential to damage materials and can cause health effects at high concentrations. It can irritate lung tissue and increase the risk of acute and chronic respiratory disease. SO_2 also reduces visibility and the level of sunlight at the ground surface.

Lead. Lead is a metal found naturally in the environment as well as in manufactured products. The major sources of lead emissions have historically been mobile and industrial sources. As a result of the phase-out of leaded gasoline, metal processing is currently the primary source of lead emissions. The highest levels of lead in air are generally found near lead smelters. Other stationary sources are waste incinerators, utilities, and lead-acid battery factories. Twenty years ago, mobile sources were the main contributor to ambient lead concentrations in the air. In the early 1970s, the USEPA established national regulations to gradually reduce the lead content in gasoline. In 1975, unleaded gasoline was introduced for motor vehicles equipped with catalytic converters. The USEPA banned the use of leaded gasoline in highway vehicles in December 1995. As a result of USEPA regulatory efforts to remove lead from gasoline, emissions of lead from the transportation sector and levels of lead in the air decreased dramatically.

Volatile Organic Compounds. VOCs (also known as ROGs) form from the combustion of fuels and the evaporation of organic solvents. VOCs are not defined as criteria pollutants; however, because VOCs accumulate in the atmosphere more quickly during the winter, when sunlight is limited and photochemical reactions are slower, they are a prime component of the photochemical smog reaction. There are no attainment designations for VOCs.

Toxic Air Contaminants. In addition to the criteria pollutants discussed above, toxic air contaminants (TACs) are another group of pollutants of concern. Some examples of TACs include benzene, butadiene, formaldehyde, and hydrogen sulfide. Potential human health effects of TACs include birth defects, neurological damage, cancer, and death. There are hundreds of different types of TACs with varying degrees of toxicity. Individual TACs vary greatly in the health risk they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another. TACs do not have ambient air quality standards, but are regulated by the USEPA, the CARB, and the SCAQMD. In 1998, the CARB identified particulate matter from diesel-fueled engines as a TAC. The CARB has completed a risk management process that identified potential cancer risks for a range of activities and land uses that are characterized by use of diesel-fueled engines.[11] High volume freeways, stationary diesel engines, and facilities attracting heavy and constant diesel vehicle traffic (distribution centers, truck stops) were identified as posing the highest risk to adjacent receptors. Other facilities associated with increased risk include warehouse distribution centers, large retail or high-volume transit centers, and schools with a high volume of bus traffic, which generate diesel engine trips. Health risks from TACs are a function of both concentration and duration of exposure.

Unlike TACs emitted from heavy industrial and other stationary sources noted above, most diesel particulate matter (DPM) is emitted from mobile sources—primarily "off-road" sources such as construction and mining equipment, agricultural equipment, and truck-mounted refrigeration units, as well as trucks and buses traveling on freeways and local roadways. DPM is the TAC most associated with warehousing uses.

The CARB Diesel Risk Reduction Plan is intended to substantially reduce diesel particulate matter emissions and associated health risks through introduction of ultra-low-sulfur diesel fuel—a step already implemented—and cleaner-burning diesel engines.[12] The technology for reducing diesel particulate matter emissions from heavy-duty trucks is well established, and both State and federal agencies are moving aggressively to regulate engines and emission control systems to reduce and remediate diesel emissions.

Table 4.1.2 describes the sources and effects of criteria air pollutants.

The Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588)(Health & Safety Code § 44300, *et seq*.; Cal. Code Regs § 93300, *et seq.*) Under AB 2588, stationary sources of air pollutants are required to report the types and quantities of certain substances that their facilities routinely released into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, identify facilities having localized impacts, determine health risks, and notify nearby residents of significant risks.

11 CARB. 2000a. *Fact Sheet – California's Plan to Reduce Diesel Particulate Matter Emissions*. October. Website: www.arb.ca.gov/diesel/factsheets/rrpfactsheet.pdf (accessed May 13, 2024).

12 CARB. 2000b. *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles*. October. Prepared by the Stationary Source Division and Mobile Source Control Division. Website: www.arb.ca.gov/diesel/documents/rrpFinal.pdf (accessed May 13, 2024).

Table 4.1.2: Sources and Health Effects of Air Pollutants

Pollutants	Sources	Primary Effects
Ozone (O_3)	• Precursor sources:[1] motor vehicles, industrial emissions, and consumer products.	• Respiratory symptoms. • Worsening of lung disease leading to premature death. • Damage to lung tissue. • Crop, forest, and ecosystem damage. • Damage to a variety of materials, including rubber, plastics, fabrics, paints, and metals.
Particulate Matter Less than 2.5 Microns in Diameter ($PM_{2.5}$)	• Cars and trucks (especially diesels). • Fireplaces, woodstoves. • Windblown dust from roadways, agriculture, and construction.	• Premature death. • Hospitalization for worsening of cardiovascular disease. • Hospitalization for respiratory disease. • Asthma-related emergency room visits. • Increased symptoms, increased inhaler usage.
Particulate Matter Less than 10 Microns in Diameter (PM_{10})	• Cars and trucks (especially diesels). • Fireplaces, woodstoves. • Windblown dust from roadways, agriculture, and construction.	• Premature death and hospitalization, primarily for worsening of respiratory disease. • Reduced visibility and material soiling.
Nitrogen Oxides (NO_X)	• Any source that burns fuels such as cars, trucks, construction and farming equipment, and residential heaters and stoves.	• Lung irritation. • Enhanced allergic responses.
Carbon Monoxide (CO)	• Any source that burns fuels such as cars, trucks, construction and farming equipment, and residential heaters and stoves.	• Chest pain in patients with heart disease. • Headache. • Light-headedness. • Reduced mental alertness.
Sulfur Oxides (SO_X)	• Combustion of sulfur-containing fossil fuels. • Smelting of sulfur-bearing metal ores. • Industrial processes.	• Worsening of asthma: increased symptoms, increased medication usage, and emergency room visits.
Lead (Pb)	• Contaminated soil.	• Impaired mental functioning in children. • Learning disabilities in children. • Brain and kidney damage.
Toxic Air Contaminants (TACs)	• Cars and trucks (especially diesels). • Industrial sources, such as chrome platers. • Neighborhood businesses, such as dry cleaners and service stations. • Building materials and products.	• Cancer. • Reproductive and developmental effects. • Neurological effects.

Source: California Air Resources Board (2018).

[1] Ozone is not generated directly by these sources. Rather, chemicals emitted by these precursor sources react with sunlight to form ozone in the atmosphere.

Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRUs) and TRU Generator Sets, and Facilities where TRUs Operate (TRU ATCM). CARB adopted the TRU ATCM in 2004 (and amended it in 2010 and 2011) to reduce diesel PM emissions and resulting health risk from diesel-powered TRUs. On February 24, 2022, CARB adopted amendments to the TRU ATCM (2022 Amendments) to achieve additional emission and health risk reductions from diesel-powered TRUs and increase the use of zero-emission (ZE) technology in the off-road sector. The 2022 Amendments will help meet the State's multiple risk reduction, air quality, and climate goals, as well

as the directive of Executive Order (EO) N-79-20, which set a goal for 100 percent ZE off-road vehicles and equipment in the State by 2035.

The California Air Resources Board Handbook. CARB has developed an Air Quality and Land Use Handbook[13] (CARB Handbook), which is intended to serve as a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. According to the CARB Handbook, air pollution studies have shown an association between proximity to high traffic roadways and respiratory and other non-cancer health effects. Other studies have shown that diesel exhaust and other cancer-causing chemicals emitted from cars and trucks are responsible for much of the overall cancer risk from airborne toxics in California. The CARB Handbook recommends that county and city planning agencies strongly consider proximity to these sources when finding new locations for "sensitive" land uses such as homes, medical facilities, daycare centers, schools, and playgrounds.

Land use designations with air pollution sources of concern include freeways, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and large gasoline service stations. Key recommendations in the CARB Handbook include taking steps to avoid siting new, sensitive land uses:

- Within 500 feet of a freeway, urban roads with 100,000 vehicles/day or rural roads with 50,000 vehicles/day;
- Within 1,000 feet of a major service and maintenance rail yard;
- Immediately downwind of ports (in the most heavily impacted zones) and petroleum refineries;
- Within 300 feet of any dry-cleaning operation (for operations with two or more machines, provide 500 feet); and
- Within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater).

The CARB Handbook specifically states that its recommendations are advisory and acknowledges land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality-of-life issues.

The recommendations are generalized and do not consider site-specific meteorology, freeway truck percentages, or other factors that influence risk for a particular project site. The purpose of this guidance is to further examine project sites for actual health risk associated with the location of new sensitive land uses.

[13] CARB. 2005. *Air Quality and Land Use Handbook: A Community Health Perspective* (CARB Handbook). April.

4.1.2.4 Regional Regulations

South Coast Air Quality Management District Rules. The SCAQMD has jurisdiction over most air quality matters in the Basin. This area includes all of Orange County, Los Angeles County except for the Antelope Valley, the non-desert portion of western San Bernardino County, and the western and Coachella Valley portions of Riverside County. The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin and is tasked with implementing certain programs and regulations required by the CAA and the CCAA. The SCAQMD prepares plans to attain the CAAQS and NAAQS. SCAQMD is directly responsible for reducing emissions from stationary (area and point) sources. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures though educational programs or fines, when necessary. The following regulations and rules promulgated by SCAQMD are applicable to the proposed project:

- **Regulation IV - Prohibitions:** This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air pollutant emissions, fuel contaminants, start-up/shutdown exemptions, and breakdown events.

    - **Rule 402 - Nuisance:** This rule restricts the discharge of any contaminant in quantities that cause or have a natural ability to cause injury, damage, nuisance, or annoyance to businesses, property, or the public. Future development projects that are implemented in accordance with the proposed zoning and updated land use designations will be required to comply with Rule 402.

    - **Rule 403 - Fugitive Dust:** This rule requires the prevention, reduction, or mitigation fugitive dust emissions from a project site. Rule 403 restricts visible fugitive dust to a project property line, restricts the net PM_{10} emissions to less than 50 micrograms per cubic meter ($\mu g/m^3$) and restricts the tracking out of bulk materials onto public roads. Additionally, Rule 403 requires an applicant to use one or more of the best available control measures (identified in the tables within the rule). Control measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers, and/or ceasing all activities. Finally, Rule 403 requires that a contingency plan be prepared if so determined by the USEPA. In addition, SCAQMD Rule 403(e), Additional Requirements for Large Operations, includes requirements to provide Large Operation Notification Form 403 N, appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control training class in the South Coast Air Basin. Future development projects that are implemented in accordance with the proposed zoning and updated land use designations will be required to comply with Rule 403.

- **Regulation XI - Source Specific Standards:** Regulation XI sets emissions standards for different sources.

    - **Rule 1113 - Architectural Coatings:** This rule limits the amount of VOCs from architectural coatings and solvents, which lowers the emissions of odorous compounds. Future

development projects that are implemented in accordance with the proposed zoning and updated land use designations will be required to comply with Rule 1113.

The SCAQMD is responsible for demonstrating regional compliance with ambient air quality standards but has limited direct involvement in reducing emissions from fugitive, mobile, and natural sources. To that end, the SCAQMD works cooperatively with CARB, the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and other federal and State government agencies. It has responded to this requirement by preparing a series of AQMPs to meet the CAAQS and NAAQS. SCAQMD and SCAG are responsible for formulating and implementing the AQMP for the Basin. The main purpose of an AQMP is to bring the area into compliance with federal and State air quality standards. Every several years, SCAQMD prepares a new AQMP, updating the previous plan and the 20-year horizon.[14] The Final 2022 Air Quality Management Plan is the currently adopted AQMP. Key elements of the Final 2022 AQMP include:

- Calculating and taking credit for co-benefits from other planning efforts (e.g., climate, energy, and transportation)
- A strategy with fair-share emission reductions at the federal, State, and local levels
- Investment in strategies and technologies meeting multiple air quality objectives
- Seeking new partnerships and significant funding for incentives to accelerate deployment of zero-emission and near-zero emission technologies
- Enhanced socioeconomic assessment, including an expanded environmental justice analysis
- Attainment of the 24-hour $PM_{2.5}$ standard in 2019 with no additional measures
- Attainment of the annual $PM_{2.5}$ standard by 2025 with implementation of a portion of the O_3 strategy
- Attainment of the 1-hour O_3 standard by 2022 with no reliance on “black box” future technology (CAA Section 182(e)(5) measures)

The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low nitrogen oxides (NO_x) technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard.

[14] South Coast Air Quality Management District (SCAQMD). 2016a. *Final 2016 Air Quality Management Plan*. March.

Southern California Association of Governments. SCAG is a council of governments for Los Angeles, Orange, Riverside, San Bernardino, Imperial, and Ventura counties. It is a regional planning agency and serves as a forum for regional issues relating to transportation, the economy and community development, and the environment. SCAG is the federally designated Metropolitan Planning Organization (MPO) for the majority of the Southern California region and is the largest MPO in the nation. With regard to air quality planning, SCAG prepares the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP), which address regional development and growth forecasts and form the basis for the land use and transportation control portions of the AQMP and are used in the preparation of the air quality forecasts and consistency analysis included in the AQMP. The RTP, RTIP, and AQMP are based on projections originating within local jurisdictions.

Although SCAG is not an air quality management agency, it is responsible for developing transportation, land use, and energy conservation measures that affect air quality. SCAG's Regional Comprehensive Plan (RCP) provides growth forecasts that are used in the development of air quality-related land use and transportation control strategies by the SCAQMD. The RCP is a framework for decision-making for local governments, assisting them in meeting federal and State mandates for growth management, mobility, and environmental standards, while maintaining consistency with regional goals regarding growth and changes. Policies within the RCP include consideration of air quality, land use, transportation, and economic relationships by all levels of government.

SCAG adopted the 2024–2050 RTP/Sustainable Communities Strategy (SCS) (collectively called Connect SoCal) on April 4, 2024. Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. Connect SoCal is an important planning document for the region, allowing project sponsors to qualify for federal funding and takes into account operations and maintenance costs, to ensure reliability, longevity, and cost effectiveness.

Using growth forecasts and economic trends, the RTP provides a vision for transportation throughout the region for the next 20 years. It considers the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future, identifying regional transportation strategies to address mobility needs. The SCS is a required element of the RTP, which integrates land use and transportation strategies to achieve CARB emissions reduction targets. The inclusion of the SCS is required by SB 375, which was enacted to reduce GHG emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. The RTP/SCS would successfully achieve and exceed the GHG emission-reduction targets set by the CARB by achieving an 8 percent reduction by 2020, an 18 percent reduction by 2035, and a 21 percent reduction by 2040 compared to the 2005 level on a per capita basis. This RTP/SCS also meets criteria pollutant emission budgets set by the USEPA.

4.1.2.5 Local Regulations

City of Cypress General Plan. The Air Quality Element of the City's General Plan is intended to protect public health and welfare by implementing measures that allow the Basin to attain federal and State air quality standards. To achieve this goal, the Air Quality Element sets forth a number of programs to reduce current pollutant emissions and to require new development to include

measures to comply with air quality standards. The Air Quality Element identifies goals and policies to reduce the generation of pollutants. It also recognizes that air quality is a regional issue affecting the entire Basin. Thus, most of the goals and policies in the Air Quality Element apply generally to the City but not necessarily to individual development projects.

4.1.3 Existing Environmental Setting

The City is part of the South Coast Air Basin and is under the jurisdiction of SCAQMD. Background information about air pollutants and health effects, climate, meteorological conditions, and regional air quality conditions in the Basin and local air quality conditions in the vicinity of the project site are provided below.

4.1.3.1 South Coast Air Basin

The SCAQMD was created by the 1977 Lewis-Presley Air Quality Management Act, which merged four county air pollution control bodies into one regional district. Under the Act, the SCAQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and State air quality standards. As previously stated, the project site is located within the Basin, a 6,745-square-mile subregion of the SCAQMD, which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The Basin is bounded by the San Gabriel, San Bernardino, and San Jacinto mountains to the north and east and by the Pacific Ocean to the south and west.

Air Pollutants and Health Effects. As previously discussed, both NAAQS and CAAQS have been established for six criteria air pollutants: CO, O_3, NO_2, SO_2, Pb, PM_{10}, and $PM_{2.5}$. In addition, the State has set standards for SO_4^{2-}, H_2S, C_2H_3Cl, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. Two criteria pollutants, O_3 and NO_2, are considered regional pollutants because they (or their precursors) affect air quality on a regional scale. Pollutants such as CO, SO_2, and Pb are considered local pollutants that tend to accumulate in the air locally.

The primary pollutants of concern in the City are O_3, CO, and $PM_{2.5}$. Significance thresholds established by an air quality district are used to manage total regional and local emissions within an air basin based on the air basin's attainment status for criteria pollutants. These emission thresholds were established for individual development projects that would contribute to regional and local emissions and could adversely affect or delay the air basin's projected attainment target goals for nonattainment criteria pollutants.

Because of the conservative nature of the significance thresholds and the basin-wide context of individual development project emissions, there is no direct correlation between a single project and localized air quality-related health effects. One individual project that generates emissions exceeding a threshold does not necessarily result in adverse health effects for residents in the project vicinity. This condition is especially true when the criteria pollutants exceeding thresholds are those with regional effects, such as ozone precursors like nitrogen oxides (NO_X) and ROGs.

Further, by its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to by itself result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a

project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant. In developing thresholds of significance for air pollutants, the air quality districts have considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

Occupants of facilities such as schools, daycare centers, parks and playgrounds, hospitals, and nursing and convalescent homes are considered to be more sensitive than the general public to air pollutants because these population groups have increased susceptibility to respiratory disease. Persons engaged in strenuous work or exercise also have increased sensitivity to poor air quality. Residential areas are considered more sensitive to air quality conditions, compared to commercial and industrial areas, because people generally spend longer periods of time at their residences, with greater associated exposure to ambient air quality conditions. Recreational uses are also considered sensitive compared to commercial and industrial uses due to greater exposure to ambient air quality conditions associated with exercise. These populations are referred to as sensitive receptors.

4.1.3.2 Existing Climate and Air Quality

The following provides a discussion of the local and regional air quality and climate in the City of Cypress.

Climate/Meteorology. Air quality in the City of Cypress is not only affected by various emission sources (e.g., mobile and industry), but also by atmospheric conditions (e.g., wind speed, wind direction, temperature, and rainfall). The combination of topography, low mixing height, abundant sunshine, and emissions from the second-largest urban area in the United States gives the Basin some of the worst air pollution in the nation.

The annual average temperature varies little throughout the Basin, ranging from the low to middle 60s degrees Fahrenheit (°F). With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. The climatological station closest to the City is the Anaheim station.[15] The monthly average maximum temperature recorded at this station ranged from 69.7°F in December to 87.1°F in August, with an annual average maximum of 77.4°F. The monthly average minimum temperature recorded at this station ranged from 46.9°F in December to 64.5°F in August, with an annual average minimum of 55.4°F. These levels are representative of the City.

The majority of annual rainfall in the Basin occurs between November and April. Summer rainfall is minimal and is generally limited to scattered thundershowers in coastal regions and slightly heavier showers in the eastern portion of the Basin and along the coastal side of the mountains. Average monthly rainfall at the Anaheim station varied from 0.01 inch in August to 3.47 inches in February, with an annual total of 14.09 inches. Patterns in monthly and yearly rainfall totals are unpredictable due to fluctuations in the weather.

[15] Western Regional Climate Center. Recent Climate in the West. Website: http://www.wrcc.dri.edu, (accessed May 13, 2024).

The Basin experiences a persistent temperature inversion (increasing temperature with increasing altitude) as a result of the Pacific high. This inversion limits the vertical dispersion of air contaminants, holding them relatively near the ground. As the sun warms the ground and the lower air layer, the temperature of the lower air layer approaches the temperature of the base of the inversion (upper) layer until the inversion layer finally breaks, allowing vertical mixing with the lower layer. This phenomenon is observed in mid-afternoon to late afternoon on hot summer days when the air appears to clear up suddenly. Winter inversions frequently break by midmorning.

Winds in the City blow predominantly from the south-southwest, with relatively low velocities. Wind speeds in the City average about 5 miles per hour (mph). Summer wind speeds average slightly higher than winter wind speeds. Low average wind speeds, together with a persistent temperature inversion, limit the vertical dispersion of air pollutants throughout the Basin. Strong, dry, north or northeasterly winds, known as Santa Ana winds, occur during the fall and winter months, dispersing air contaminants. The Santa Ana conditions tend to last for several days at a time.

The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. On days of no inversion or high wind speeds, ambient air pollutant concentrations are the lowest. During periods of low inversions and low wind speeds, air pollutants generated in urbanized areas are transported predominantly onshore into Riverside and San Bernardino counties. In the winter, the greatest pollution problems are CO and NO_X because of extremely low inversions and air stagnation during the night and early morning hours. In the summer, the longer daylight hours and brighter sunshine combine to cause a reaction between hydrocarbons and NO_x to form photochemical smog. Smog is a general term that is naturally occurring fog that has become mixed with smoke or pollution. In this context it is better described as a form of air pollution produced by the photochemical reaction of sunlight with pollutants that have been released into the atmosphere, especially by automotive emissions.

Attainment Status. CARB is required to designate areas of the State as attainment, nonattainment, or unclassified for all State standards. An attainment designation for an area signifies that pollutant concentrations did not violate the standard for that pollutant in that area. A nonattainment designation indicates that a pollutant concentration violated the standard at least once, excluding those occasions when a violation was caused by an exceptional event, as defined in the criteria. An unclassified designation signifies that data do not support either an attainment or nonattainment status. The CCAA divides districts into moderate, serious, and severe air pollution categories, with increasingly stringent control requirements mandated for each category.

The EPA designates areas for O_3, CO, and NO_2 as one of the following: does not meet the primary standards, or cannot be classified, or better than national standards. For SO_2, areas are designated as: does not meet the primary standards, does not meet the secondary standards, cannot be classified, or better than national standards. On February 2024, the EPA issued a final revised standard for $PM_{2.5}$ to lower the primary standard from 12 µg/m^3 to 9 µg/m^3. The EPA will issue final area designations in February 2026. **Table 4.1.3** provides a summary of the attainment status for the Basin with respect to both National and California Ambient Air Quality Standards (NAAQS and CAAQS, respectively).

Table 4.1.3: South Coast Air Basin Attainment Status

Pollutant	State	Federal
O_3 1 hour	Nonattainment	Extreme Nonattainment
O_3 8 hour	Nonattainment	Extreme Nonattainment
PM_{10}	Nonattainment	Attainment/Maintenance
$PM_{2.5}$	Nonattainment	Serious Nonattainment
CO	Attainment	Attainment/Maintenance
NO_2	Attainment	Attainment/Maintenance
SO_2	N/A	Attainment/Unclassified
Lead	Attainment	Partial Nonattainment[1]
All others	Attainment/Unclassified	Attainment/Unclassified

Source: South Coast Air Quality Management District (2016b).

[1] Partial Nonattainment designation – Los Angeles County portion of Basin only for near-source monitors. Expect redesignation to attainment based on current monitoring data.

CO = carbon monoxide
N/A = not applicable
NO_2 = nitrogen dioxide
O_3 = ozone
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SO_2 = sulfur dioxide

Air Quality Monitoring Results. Air quality monitoring stations are located throughout the nation and are maintained by the local air pollution control district and State air quality regulating agencies. The SCAQMD, together with the CARB, maintains ambient air quality monitoring stations in the Basin. The air quality monitoring station closest to the City is the station at 1630 West Pampas Lane in Anaheim.

Pollutant monitoring results for 2021, 2022, and 2023 at the Anaheim monitoring station are shown in **Table 4.1.4.** Monitoring indicates that air quality in the vicinity of the City has generally been good. As indicated by the monitoring results, the federal PM_{10} standard was not exceeded during this 3-year period. The State PM_{10} standard was exceeded once in 2021, and an unknown number of times in 2022 and 2023. The federal $PM_{2.5}$ standard had 10 exceedances in 2021, no exceedances in 2022, and an unknown number of exceedances in 2023. The State 1-hour and 8-hour ozone standards had no exceedances in 2021 and an unknown number of exceedances in 2022 and 2023. The federal 8-hour standards had no exceedances in 2021 and one exceedance in 2022 and 2023. The CO and NO_2 standards were not exceeded in this area during this 3-year period. SO_2 data were not available from 2021 to 2023 at air quality monitoring stations in Orange County.

4.1.4 Methodology

The proposed project would result in criteria pollutant emissions from construction and operational sources. Construction activities would generate emissions at the project site from off-road construction equipment, and on road construction-related truck hauling, vendor deliveries, and worker commuting. Project-related operational activities would generate emissions from vehicle traffic and miscellaneous sources at the project site, such as natural gas combustion associated with heating, and use of landscaping equipment. This analysis used the California Emissions Estimator Model (CalEEMod), Version 2022.1, to quantify criteria pollutant emissions for both construction and operation of the proposed project.

Table 4.1.4: Ambient Air Quality in the Project Vicinity

Pollutant	Standard	2021	2022	2023
Carbon Monoxide (CO)[1]				
Maximum 1-hour concentration (ppm)		2.1	2.4	2.5
Number of days exceeded:	State: > 20 ppm	0	0	0
	Federal: > 35 ppm	0	0	0
Maximum 8-hour concentration (ppm)		1.5	1.4	1.6
Number of days exceeded:	State: > 9 ppm	0	0	0
	Federal: > 9 ppm	0	0	0
Ozone (O_3)[1]				
Maximum 1-hour concentration (ppm)		0.089	0.102	0.089
Number of days exceeded:	State: > 0.09 ppm	0	ND	ND
Maximum 8-hour concentration (ppm)		0.068	0.076	0.076
Number of days exceeded:	State: > 0.07 ppm	0	ND	ND
	Federal: > 0.07 ppm	0	1	1
Coarse Particulates (PM_{10})[1]				
Maximum 24-hour concentration (µg/m^3)		63.6	67.0	97.0
Number of days exceeded:	State: > 50 µg/m^3	1	ND	ND
	Federal: > 150 µg/m^3	0	0	0
Annual arithmetic average concentration (µg/m^3)		23.2	ND	ND
Exceeded for the year:	State: > 20 µg/m^3	Yes	ND	ND
	Federal: > 50 µg/m^3	No	ND	ND
Fine Particulates ($PM_{2.5}$)[1]				
Maximum 24-hour concentration (µg/m^3)		54.4	33.1	45.6
Number of days exceeded:	Federal: > 35 µg/m^3	10	0	ND
Annual arithmetic average concentration (µg/m^3)		11.5	9.9	9.5
Exceeded for the year:	State: > 12 µg/m^3	No	No	No
	Federal: > 15 µg/m^3	No	No	No
Nitrogen Dioxide (NO_2)[1]				
Maximum 1-hour concentration (ppm)		0.067	0.053	0.051
Number of days exceeded:	State: > 0.250 ppm	0	0	0
Annual arithmetic average concentration (ppm)		0.012	0.012	0.010
Exceeded for the year:	Federal: > 0.053 ppm	No	No	No
Sulfur Dioxide (SO_2)[1]				
Maximum 1-hour concentration (ppm)		ND	ND	ND
Number of days exceeded:	State: > 0.25 ppm	ND	ND	ND
Maximum 24-hour concentration (ppm)		ND	ND	ND
Number of days exceeded:	State: > 0.04 ppm	ND	ND	ND
	Federal: > 0.14 ppm	ND	ND	ND
Annual arithmetic average concentration (ppm)		ND	ND	ND
Exceeded for the year:	Federal: > 0.030 ppm	ND	ND	ND

Sources: CARB (2021) and USEPA (2021).
[1] Data taken from the Anaheim monitoring station at 1630 West Pampas Lane.
CARB = California Air Resources Board
ND = No data. There were insufficient (or no) data to determine the value.
ppm = parts per million
USEPA = United States Environmental Protection Agency

CalEEMod provides a platform to calculate both construction emissions and operational emissions from a project. It calculates both the daily maximum and annual average emissions for criteria pollutants as well as total or annual greenhouse gas (GHG) emissions. The model also provides default values for water and energy use. Specifically, the model performs the following calculations:

- Short-term construction emissions associated with demolition, site preparation, grading, building, architectural coating (painting), and paving from off-road construction equipment; on-road mobile equipment associated with workers, vendors, delivery, and hauling; fugitive dust associated with grading, demolition, truck loading, and roads; and emissions of volatile organic compounds (VOCs) from architectural coating and paving.

- Operational emissions, such as on-road mobile vehicle traffic generated by the land uses, fugitive dust associated with roads, volatile emissions of reactive organic gases (ROGs) from architectural coatings, off-road emissions from landscaping equipment, volatile emissions of ROGs from consumer products and cleaning supplies, natural gas usage in the buildings, electricity usage in the buildings, water usage by the land uses, and solid waste disposal by the land uses. To assess potential operational impacts under a worst-case scenario (from an emissions perspective), the analysis assumed that 100 percent of the warehouse square footage would be refrigerated and that 100 percent of the trucks accessing the project site would be refrigerated trucks.

In addition, CalEEMod contains default values and existing regulation methodologies to use in each specific local air quality district region. Appropriate statewide default values can be used if regional default values are not defined. This analysis used project-specific inputs and relevant model default factors for the Orange County area, consistent with SCAQMD requirements. CalEEMod was used to calculate project-related construction and operational emissions of criteria pollutants. The CalEEMod output is provided in **Appendix C** of this Draft EIR.

4.1.5 Thresholds of Significance

The thresholds for air quality impacts used in this analysis are consistent with Appendix G of the State CEQA Guidelines and the City's Initial Study/Environmental Checklist. The proposed project may be deemed to have a significant impact with respect to air quality if it would:

Threshold AQ-1: Conflict with or obstruct implementation of the applicable air quality plan?

Threshold AQ-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Threshold AQ-3: Expose sensitive receptors to substantial pollutant concentrations?

Threshold AQ-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

As stated in Appendix G of the State CEQA Guidelines, where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied

upon to make determinations about a project's impacts. This Draft EIR uses the adopted thresholds of the SCAQMD, the local air quality management district.

4.1.5.1 Regional Emissions Thresholds

SCAQMD has established daily emissions thresholds for construction and operation of a proposed project in the Basin. The emissions thresholds were established based on the attainment status of the Basin with regard to air quality standards for specific criteria pollutants. Because the concentration standards were set at a level that protects public health with an adequate margin of safety, these emissions thresholds are regarded as conservative and would overstate an individual project's contribution to health risks.

Table 4.1.5, below, lists the CEQA significance thresholds for the construction and operational emissions established for the Basin.

Table 4.1.5: Regional Thresholds for Construction and Operational Emissions

Emissions Source	Pollutant Emissions Threshold (lbs/day)					
	VOC	NO_x	CO	PM_{10}	$PM_{2.5}$	SO_x
Construction	75	100	550	150	55	150
Operations	55	55	550	150	55	150

Source: SCAQMD. Air Quality Significance Thresholds. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf (accessed June 2024).

CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOC = volatile organic compounds

Projects in the Basin with construction- or operation-related emissions that exceed any of their respective emission thresholds would be considered significant under SCAQMD guidelines. These thresholds, which SCAQMD developed and that apply throughout the Basin, apply as both project and cumulative thresholds. If a project exceeds these standards, it is considered to have a project-specific and cumulative impact.

4.1.5.2 Localized Impacts

The SCAQMD published its *Final Localized Significance Threshold Methodology* in July 2008, recommending that all air quality analyses include an assessment of air quality impacts to nearby sensitive receptors.[16] This guidance was used to analyze potential localized air quality impacts associated with construction of the proposed project. Localized significance thresholds (LSTs) are developed based on the size or total area of the emission source, the ambient air quality in the source receptor area, and the distance between the project and the nearest sensitive receptor. The SCAQMD defines structures that house persons (e.g., children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise) or

[16] South Coast Air Quality Management District (SCAQMD). 2008. *Final Localized Significance Threshold Methodology.* July. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf (accessed May 13, 2024).

places where they gather as sensitive receptors (i.e., residences, schools, playgrounds, child-care centers, convalescent centers, retirement homes, and athletic fields).

LSTs are based on the ambient concentrations of that pollutant within the project Source Receptor Area (SRA) and the distance to the nearest sensitive receptor. For the proposed project, the appropriate SRA for the LST is the Central Orange County area (SRA 17). SCAQMD provides LST screening tables for 25-, 50-, 100-, 200-, and 500-meter source-receptor distances. While the project site is approximately 8.53 acres, based on the anticipated construction equipment and grading and ground-disturbing activities, it is assumed that the maximum daily disturbed area for the proposed project would be 3.5 acres.

The nearest sensitive receptors for air quality emissions include a medical office located north of the project site within 960 feet. Other sensitive receptors include the residential homes located north of the project site at approximately 1,398 feet from the project site boundary line. Therefore, the LST for a 3.5-acre site at 960 ~~1,398~~ feet (~~426~~ 293 meters) were derived by interpolation.[17] The LST analysis followed the guidance of the SCAQMD for evaluating sensitive receptors, discussed in further detail in this analysis. **Table 4.1.6** lists the LST thresholds that apply during project construction and operation. To be conservative, this LST analysis assumes all area, stationary, and energy source emissions would occur on site, and 5 percent of the project-related new mobile sources, which is an estimate of the amount of project-related on-site vehicle and truck travel, would occur on site. These emissions would be compared against the operational threshold.

Table 4.1.6: SCAQMD LST Thresholds (lbs/day)

Emissions Source Category	NO_X	CO	PM_{10}	$PM_{2.5}$
Construction (3.5-acre, 426-meter distance)	191.0 ~~213.0~~	4,921.0 ~~7,166.0~~	109.0 ~~153.0~~	51.0 ~~83.0~~
Operations (3.5-acre, 426-meter distance)	191.0 ~~213.0~~	4,921.0 ~~7,166.0~~	27.0 ~~37.0~~	12.0 ~~20.0~~

Source: Final Localized Significance Threshold Methodology (SCAQMD 2008).
Note: SRA 17— Central Orange County, 3.5 acres, receptors at 960 ~~1,398~~ feet (293 ~~426~~ meters).
CO = carbon monoxide
lbs/day = pounds per day
LST = localized significance threshold
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SRA = source receptor area

4.1.5.3 Local Microscale Concentration Standards

The significance of localized project impacts under CEQA depends on whether ambient CO levels in the vicinity of the project are above or below State and federal CO standards. Because ambient CO levels are below the standards throughout the Basin, a project would be considered to have a significant CO impact if project emissions result in an exceedance of one or more of the 1-hour or 8-hour standards. The following are applicable local emission concentration standards for CO:

[17] SCAQMD. n.d. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf (accessed May 13, 2024).

- California State 1-hour CO standard of 20 parts per million (ppm)
- California State 8-hour CO standard of 9 ppm

4.1.6 Project Impacts

Threshold AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Impact AQ-1: Less Than Significant Impact. An AQMP describes air pollution control strategies to be undertaken by a city or county in a region classified as a nonattainment area to meet the requirements of the federal Clean Air Act. The main purpose of an AQMP is to bring an area into compliance with the requirements of federal and State ambient air quality standards (AAQS). The Basin is in nonattainment for the federal and State standards for O_3 and $PM_{2.5}$. In addition, the Basin is in nonattainment for the PM_{10} standard. Therefore, the Basin is classified as a nonattainment area and an AQMP is required. The applicable air quality plan is the SCAQMD's adopted 2022 AQMP.[18] The AQMP is based on regional growth projections developed by the SCAG.

A consistency determination plays an essential role in local agency project review by linking local planning and unique individual projects to the air quality plans. A consistency determination fulfills the CEQA goal of fully informing local agency decision-makers of the environmental costs of the project under consideration at a stage early enough to ensure that air quality concerns are addressed. Only new or amended General Plan elements, Specific Plans, and significantly unique projects need to undergo a consistency review given that the air quality plan strategy is based on projections from local General Plans.

The City's General Plan is consistent with the SCAG Regional Comprehensive Plan Guidelines and the SCAQMD AQMP. Pursuant to the methodology provided in the SCAQMD's *CEQA Air Quality Handbook*, consistency with the Basin 2022 AQMP is affirmed when a project: (1) would not increase the frequency or severity of an air quality standards violation or cause a new violation, and (2) is consistent with the growth assumptions in the AQMP. Consistency review is presented as follows:

1. The proposed project would result in short-term construction and long-term operational pollutant emissions that are all less than the CEQA significance emissions thresholds established by SCAQMD. Therefore, the proposed project would not result in an increase in the frequency or severity of an air quality standards violation or cause a new air quality standards violation.

2. The *CEQA Air Quality Handbook* indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities. As discussed in Chapter 3.0, Project Description, the proposed project would not include or require any amendments to the City's General Plan or City's Zoning Ordinance.

[18] South Coast Air Quality Management District (SCAQMD). 2022. *2022 Air Quality Management Plan*. Adopted December 2, 2022.

However, the proposed project is located within Planning Area 1 of the McDonnell Specific Plan, which is currently designated for general office uses. As such, the proposed project would require an amendment to the McDonnell Specific Plan to allow light industrial uses in the eastern portion of Planning Area 1, and removal of the maximum developable area requirement while retaining the 1.0:1 FAR to maintain consistency with the General Plan.

In order to determine the proposed project's consistency with the 2022 AQMP, the project must be consistent with the AQMP growth assumptions, which are based, in part, on assumptions made by local planning agencies in SCAG's RTP/SCS regarding population, housing, and growth trends. According to SCAG's 2024–2050 RTP/SCS, the City's households and employment are forecast to increase by approximately 3,900 households and 2,000 jobs, respectively, between 2019 and 2050 and would total approximately 20,300 households and 28,100 jobs by 2050.[19] The proposed project would include a 191,394-square-foot light industrial building, parking, landscaping, and associated improvements which is estimated to generate approximately 93 employees. It is anticipated that the additional 93 employees would fall within the 28,100 projected jobs for the City. Therefore, it is assumed that the project's labor demand would not substantially increase employment projections in the City. As such, the project would be consistent with SCAG's growth assumptions for new job growth in the region as identified in the RTP/SCS.

Additionally, based on the proposed project size (191,394 square feet), the proposed project is not considered a project of statewide, regional, or areawide significance (e.g., large-scale projects such as airports, electrical generating facilities, petroleum and gas refineries, residential developments of more than 500 dwelling units, and shopping centers or business establishments employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space) as defined in the California Code of Regulations (CCR) (Title 14, Division 6, Chapter 3, Article 13, Section 15206(b)). Because the proposed project would not be defined as a regionally significant project under CEQA, it does not meet the SCAG's Intergovernmental Review criteria.

Based on the consistency analysis presented above, the proposed project would be consistent with the regional AQMP. Therefore, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant, and no mitigation is required.

Threshold AQ-2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Impact AQ-2: Less Than Significant Impact. the Basin is currently designated as nonattainment for the federal and State standards for O_3 and $PM_{2.5}$. In addition, the Basin is in nonattainment for the PM_{10} standard. The Basin's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality

[19] Southern California Association of Governments (SCAG). 2024. Connect SoCal 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy. Website: https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839 (accessed May 2024).

impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of AAQS. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the SCAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified SCAQMD significance thresholds identified above in **Table 4.1.6**, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is not necessary. The following analysis assesses the potential project-level air quality impacts associated with construction and operation of the proposed project.

Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e., fugitive dust) generated by demolition, grading, building construction, paving, and other activities. Emissions from construction equipment are also anticipated and would include CO, NO_x, VOCs, directly emitted $PM_{2.5}$ or PM_{10}, and TACs such as diesel exhaust particulate matter.

Construction activities associated with the proposed project would include demolition, grading, site preparation, building construction, architectural coating, and paving activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and amount of operating equipment. Larger dust particles would settle near the source, whereas fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. SCAQMD has established Rule 403: Fugitive Dust, which would require the Applicant to implement measures that would reduce the amount of particulate matter generated during the construction period. The Rule 403 measures that were incorporated in this analysis include:

- Water active sites at least three times daily (locations where grading is to occur shall be thoroughly watered prior to earthmoving).

- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet (0.6 meter) of freeboard (vertical space between the top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.

- Reduce traffic speeds on all unpaved roads to 15 miles per hour or less.

In addition to dust-related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, sulfur oxides (SO_x), NO_x, VOCs and some soot particulate ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

Construction emissions were estimated for the proposed project using the CalEEMod. As stated in Chapter 3.0, Project Description, the project would construct a new light industrial building totaling 191,394 square feet, including 181,061 square feet of warehouse space and 10,333 square feet of office space, which was included in CalEEMod. This analysis assumes that 100 percent of the warehouse space would be refrigerated and that trucks accessing the site would also be refrigerated. The analysis also assumes that construction is anticipated to occur over a 11-month duration, with construction beginning in November 2024 and completion expected in October 2025. In addition, the proposed project would require the export of approximately 940 cubic yards of soil, which was included in CalEEMod. Other precise details of construction activities are unknown at this time; therefore, default settings (e.g., construction equipment and worker trips) from CalEEMod were used. Use of Tier 2 construction equipment was included in the CalEEMod modeling. **Table 4.1.6** identifies the maximum daily emissions associated with construction activities during each construction phase.

As shown in **Table 4.1.7**, construction emissions associated with the proposed project would not exceed the SCAQMD's thresholds for VOCs, NO_x, CO, SO_x, $PM_{2.5}$, and PM_{10}. Therefore, construction of the proposed project would not result in a cumulatively considerable increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State AAQS. Impacts would be less than significant, and no mitigation is required.

Table 4.1.7: Short-Term Regional Construction Emissions

Construction Phase	Maximum Daily Regional Pollutant Emissions (lbs/day)					
	VOCs	NO_x	CO	SO_x	Total PM_{10}	Total $PM_{2.5}$
Demolition	0.8	27.5	20.1	<0.1	4.0	1.3
Site Preparation	1.1	39.9	29.2	<0.1	9.0	5.0
Grading	0.8	23.8	18.7	<0.1	3.8	2.1
Building Construction	0.9	20.3	19.3	<0.1	2.0	1.0
Paving	1.1	13.4	11.3	<0.1	0.8	0.6
Architectural Coating	24.1	1.2	1.7	<0.1	0.3	0.1
Peak Daily Emissions	**25.2**	**39.9**	**29.2**	**<0.1**	**9.0**	**5.0**
SCAQMD Threshold	**75.0**	**100.0**	**550.0**	**150.0**	**150.0**	**55.0**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (June 2024).
Note: Maximum emissions of VOCs occurred during the overlapping building construction and architectural coating phases
CO = carbon monoxide
lbs/day = pounds per day
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_x = sulfur oxides
VOCs = volatile organic compounds

Operational Air Quality Impacts. Long-term air pollutant emissions associated with operation of the proposed project include emissions from area, energy, and mobile sources. Area-source emissions include architectural coatings, consumer products, and landscaping. Energy-source emissions result from activities in buildings that use electricity and natural gas. Mobile-source emissions are from vehicle trips associated with operation of the proposed project.

Typically, area source emissions consist of direct sources of air emissions located at the project site, including architectural coatings and the use of landscape maintenance equipment. Area source emissions associated with the project would include emissions from the use of landscaping equipment and consumer products.

Energy-source emissions result from activities in buildings for which natural gas is used. The quantity of emissions is the product of usage intensity (i.e., the amount of natural gas) and the emission factor of the fuel source. The emission factor is determined by the fuel source, with cleaner energy sources, like renewable energy, producing fewer emissions than conventional sources. The proposed project would comply with the latest California Green Building Standards Code.

Mobile source emissions are generated by the vehicle trips associated with project operations. PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Entrainment of PM_{10} occurs when vehicle tires pulverize small rocks and pavement and the vehicle wakes generate airborne dust. The contribution of tire and brake wear is small compared to the other particulate matter emission processes. Additionally, gasoline-powered engines have small rates of particulate matter emissions compared with diesel-powered vehicles.

Long-term operation emissions associated with the proposed project were calculated using CalEEMod. The proposed project analysis was conducted using land use codes *Refrigerated Warehouse No-Rail,* and *Parking Lot*. Trip generation rates used in CalEEMod for the proposed project were based on the project's trip generation estimates identified in the proposed project's Traffic Analysis (provided in **Appendix E** of this Draft EIR).[20] The proposed project would generate a total of 406 average daily trips (ADT), including 262 passenger vehicle trips, 50 two-axle truck trips, 16 three-axle truck trips, and 78 four-axle truck trips, which was included in CalEEMod. This analysis assumes that the four+-axle truck trips would travel approximately 40 miles. To be conservative, separate CalEEMod analyses were prepared for the operational analysis for the proposed project. One CalEEMod run evaluated operational and vehicle trip emissions and another CalEEMod run evaluated four+-axle truck trip emissions. In addition, it was conservatively assumed that trucks of all sizes would have diesel-powered transportation refrigerated units (TRUs). As a conservative assumption, the TRUs were modeled to be operational for up to 15 minutes per day. To be sure, 15 minutes is a conservative estimation of operational time for TRUs, as it represents a three-times exceedance of CARB's anti-idling rules, which prohibit idling for more than 5 minutes.[21] Moreover, truck operators will have access to plug-in power to operate the TRUs and will be incentivized to do

[20] Urban Crossroads. 2023. *Goodman Commerce Center Traffic Analysis*. November 21, 2023.

[21] CARB. 2004. Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. July 22. Website: https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling/about (accessed July 2024).

so based on their own fuel costs and compliance with the CARB TRU ATCM. However, to be conservative, the 15-minute runtime assumption does not take into account plugging into electric power sources. When project-specific data were not available, default assumptions from CalEEMod were used to estimate project emissions.

Long-term operational emissions associated with the existing uses were also evaluated in CalEEMod. The project site is developed with an existing 150,626-square-foot building. For purposes of analysis, and as described in Chapter 3, Project Description, the project's Traffic Analysis conservatively assumes that 37,657 square feet (25 percent) of the existing building was occupied with office uses.

The long-term operational emissions associated with the proposed project are shown in **Table 4.1.8**.

Table 4.1.8: Project Operational Emissions

Emission Type	Pollutant Emissions (lbs/day)					
	VOCs	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Existing Uses Operational Emissions						
Mobile Sources	1.4	1.1	11.0	<0.1	2.2	0.6
Area Sources	1.2	<0.1	1.6	<0.1	<0.1	<0.1
Energy Sources	<0.1	0.3	0.2	<0.1	<0.1	<0.1
Total Existing Emissions	**2.6**	**1.4**	**12.8**	**<0.1**	**2.2**	**0.6**
Proposed Project Operational Emissions						
Mobile Sources – Vehicles and Light Duty Trucks	0.7	0.7	6.2	<0.1	1.8	0.5
Mobile Sources – Heavy Duty Trucks	0.2	12.6	5.1	0.1	3.0	0.9
Area Sources	6.0	0.1	8.3	<0.1	<0.1	<0.1
Energy Sources	0.1	1.3	1.1	<0.1	0.1	0.1
TRU Truck Emissions	0.9	2.6	0.1	<0.1	<0.1	<0.1
Total Project Emissions	**7.9**	**17.3**	**20.8**	**0.1**	**4.9**	**1.5**
Total Net Emissions	**10.6**	**15.9**	**8.0**	**0.0**	**2.7**	**0.9**
SCAQMD Threshold	**55.0**	**55.0**	**550.0**	**150.0**	**150.0**	**55.0**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (June 2024).
Note: Some values may not appear to add correctly due to rounding.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

The results shown in **Table 4.1.8** indicate operational emissions associated with the proposed project would not exceed the significance criteria for daily VOCs, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State AAQS. Impacts would be less than significant, and no mitigation is required.

Long-Term Microscale (CO Hot Spot) Analysis. Vehicular trips associated with the proposed project would contribute to congestion at intersections and along roadway segments in the vicinity of the project site. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed project. The primary mobile-source pollutant of local concern is CO, a

direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited; under normal meteorological conditions, it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels, affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients). Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

An assessment of project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Existing CO concentrations in the immediate project vicinity are not available. Ambient CO levels monitored at the Anaheim Monitoring Station, located at 1630 W. Pampas Lane in Anaheim, showed a highest recorded 1-hour concentration of 2.5 parts per million (ppm) (the State standard is 20 ppm) and a highest 8-hour concentration of 1.6 ppm (the State standard is 9 ppm) from 2021 to 2023. The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under peak traffic conditions represent a worst-case analysis. Reduced speeds and vehicular congestion at intersections result in increased CO emissions.[22]

Based on the trip generation described in Section 4.7, Transportation, the proposed project would generate 406 ADT, with approximately 21 trips occurring in the AM peak hour and approximately 24 trips occurring in the PM peak hour. As the proposed project would not generate 100 or more AM or PM peak hour trips, the proposed project did not meet the criteria for an evaluation of study area intersection or roadway segment levels of service. Overall, truck trips associated with the project are minor relative to the existing traffic on nearby streets that are proximate to residential uses, such as Valley View Street. Furthermore, as described in the project's traffic analysis, truck trips will disperse along roadways, not concentrating trips on a specific roadway. As a result, per hour truck trips associated with the project on surrounding streets proximately located near residential uses are expected to be negligible in the context of overall existing traffic volumes. Finally, Valley View Street is a designated truck route and a "major" roadway in the City's General Plan and, along with Katella Avenue, carries the highest volumes of daily traffic in the City. (General Plan at CIR-4.) Therefore, it is assumed that the addition of the proposed project traffic would not create any significant adverse impacts to nearby intersections or have impacts on sensitive receptors.

Therefore, given the extremely low level of CO concentrations in the vicinity of the project site and the lack of traffic impacts at any intersections, project-related vehicles are not expected to contribute significantly to CO concentrations exceeding the State or federal CO standards. Because no CO hot spot would occur, as identified in the proposed project, there would be no project-related impacts on CO concentrations. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under applicable NAAQS and CAAQS, and impacts would be less than significant.

[22] United States Environmental Protection Agency (USEPA). Outdoor Air Quality Data. 2021. Website: https://www.epa.gov/outdoor-air-quality-data/monitor-values-report (accessed May 13, 2024).

Threshold AQ-3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-3: Less Than Significant Impact. The SCAQMD defines structures that house persons (e.g., children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise) or places where they gather (i.e., residences, schools, playgrounds, child-care centers, convalescent centers, retirement homes, and athletic fields) as sensitive receptors. Sensitive receptors are defined as people who have an increased sensitivity to air pollution or environmental contaminants. The nearest sensitive receptors for air quality emissions include a medical office located north of the project site within 960 feet. Other sensitive receptors include the residential uses approximately 1,398 feet north of the project site boundary line.

As discussed above, LSTs are based on the ambient concentrations of that pollutant within the project SRA and the distance to the nearest sensitive receptor. SCAQMD provides LST screening tables for 25-, 50-, 100-, 200-, and 500-meter source-receptor distances. For the proposed project, the appropriate SRA for the LST is the Central Orange County area (SRA 17). While the project site is approximately 8.53 acres, based on the anticipated construction equipment and grading and ground-disturbing activities, it is assumed that the maximum daily disturbed area for the proposed project would be 3.5 acres. Therefore, the LSTs for a 3.5-acre site at 960 ~~1,398~~ feet (293 ~~426~~ meters) were derived by interpolation.

By design, the localized impacts analysis only includes on-site sources; however, the CalEEMod outputs do not separate on-site and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions detailed in **Table 4.1.9** assume all area, stationary, and energy source emissions would occur on site, and 5 percent of the project-related new mobile sources, which is an estimate of the amount of project-related on-site vehicle and truck travel, would occur on site. Considering the total trip length included in CalEEMod, the 5 percent assumption is conservative. The results of the LST analysis for both construction and operation of the proposed project are summarized in **Tables 4.1.9** and **4.1.10** below. As shown in **Tables 4.1.9** and **4.1.10,** the proposed project would not result in an exceedance of a SCAQMD LST during project construction or operation. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant. Mitigation is not required.

Threshold AQ-4: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact AQ-4: Less Than Significant Impact.

Construction. Potential odor sources associated with the proposed project may result from Heavy-heavy-duty equipment on the project site during construction would emit odors, primarily from equipment exhaust. In addition, the application of asphalt and architectural coatings during construction activities may result in odors. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and are thus considered less than significant.

Table 4.1.9: Construction Localized Emissions

Emissions Sources	Pollutant Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Construction Emissions	39.9	28.3	8.8	5.0
SCAQMD LST	**191.0 ~~213.0~~**	**4,921.0 ~~7,166.0~~**	**109.0 ~~153.0~~**	**51.0 ~~83.0~~**
Significant Emissions?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (October 2024).
Note: SRA 17— Central Orange County, 3.5 acres, receptors at 960 ~~1,398~~ feet (293 ~~426~~ meters).
CO = carbon monoxide
lbs/day = pounds per day
LST = localized significance threshold
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SRA = Source Receptor Area

Table 4.1.10: Operational Localized Emissions

Emissions Sources	Pollutant Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions	1.4	10.0	<1.0	<1.0
SCAQMD LST	**191.0 ~~213.0~~**	**4,921.0 ~~7,166.0~~**	**27.0 ~~37.0~~**	**12.0 ~~20.0~~**
Significant Emissions?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (October 2024).
Note: SRA 17— Central Orange County, 3.5 acre, receptors at 960 ~~1,398~~ feet (293 ~~426~~ meters), on-site traffic 5 percent of total.
CO = carbon monoxide
lbs/day = pounds per day
LST = localized significance threshold
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SRA = Source Receptor Area

Operation. SCAQMD Rule 402 regarding nuisances states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."

The proposed project would construct a light industrial building. Therefore, the proposed project does not contain land uses typically associated with emitting objectionable odors. The proposed project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed project construction and operations would be less than significant, and no mitigation is required.

4.1.7 Level of Significance Prior to Mitigation

The proposed project would not result in any significant impacts related to air quality, and no mitigation is required.

4.1.8 Regulatory Compliance Measures and Mitigation Measures

No regulatory compliance measures are applicable to the proposed project, and no mitigation is required.

4.1.9 Level of Significance after Mitigation

The proposed project would not result in any significant impacts related to air quality.

4.1.10 Cumulative Impacts

As defined in the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for air quality. The cumulative impact area for air quality related to the proposed project is the South Coast Air Basin. Each project in the Basin is required to comply with SCAQMD rules and regulations and is subject to independent review. Per SCAQMD guidance, projects that exceed project-specific significance thresholds are considered to be cumulatively considerable. Conversely, projects that do not exceed project-specific thresholds are generally not considered to be cumulatively significant.[23]

The Basin is currently designated as a nonattainment area for the federal O_3 standard and $PM_{2.5}$ standard and as a nonattainment area for the State O_3, PM_{10}, and $PM_{2.5}$ standard. Thus, the Basin has not met the federal and State standards for these air pollutants. Future development that may take place with implementation of the project would contribute criteria pollutants to the area during project construction and operation.

Air pollution is inherently a cumulative type of impact measured across an air basin. The discussion under Threshold AQ-2, above, includes an analysis of the proposed project's contribution to cumulative air impacts. As discussed above, construction emissions associated with the proposed project would not exceed the SCAQMD thresholds for VOCs, NO_x, CO, SO_X, $PM_{2.5,}$ or PM_{10} emissions. The proposed project's construction- and operation-related regional daily emissions are less than the SCAQMD significance thresholds for all criteria pollutants. In addition, adherence to SCAQMD rules and regulations on a project-by-project basis would substantially reduce potential impacts associated with the related projects and basin-wide air pollutant emissions. Therefore, the proposed project would not have a cumulatively considerable increase in emissions and the proposed project's cumulative air quality impacts would be less than significant.

[23] Goss, Tracy A and Kroeger, Amy, *White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution, Appendix D, Cumulative Impact Requirements Pursuant to the California Environmental Quality Act*, <https://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4> (Accessed May 24, 2024).

4.2 CULTURAL RESOURCES

This section evaluates the potential for the 5665 Plaza Drive Project (proposed project) to impact cultural resources. Cultural resources are sites, buildings, structures, objects, and districts over 50 years old that may have traditional or cultural value for the historical significance they possess. This section summarizes information obtained from the *Phase I Environmental Site Assessment (Phase I ESA) 5665 Plaza Drive Cypress*, California, prepared by Stantec Consulting Services, Inc. (September 2021) and provided in **Appendix D** of this Draft EIR.

The term "site" is used in two contexts in this section:

- "Project site" refers to the approximately 8.53-acre site proposed for development.
- "Cultural resources site" refers to the specific locations of documented cultural materials or artifacts.

4.2.1 Scoping Process

The City received 3 comment letters during the public review period for the NOP. For copies of the NOP comment letters, refer to **Appendix A** of this Draft EIR. None of the comment letters included comments related to cultural resources.

4.2.2 Regulatory Setting

This section includes applicable federal, State, regional, and City regulations.

4.2.2.1 Federal Regulations

The National Historic Preservation Act of 1966 (NHPA) (16 U.S.C. ch. 1A, subch. II; § 470). The NHPA was enacted to preserve historical and archaeological sites in the United States. The NHPA established the Advisory Council on Historic Preservation (ACHP), the National Register of Historic Places (National Register), State Historic Preservation Offices and Officers (SHPOs), and allows for Native American Indian tribes to assume part or all of the SHPO's role through establishment of Tribal Historic Preservation Officers (THPOs). The NHPA also established the Section 106 consultation process, which mandates that federal agencies proposing actions that may affect historic properties eligible for or listed on the National Register must engage in consultation with interested parties. This typically includes consultation with the SHPO/THPO, local and State historical societies and organizations; and the ACHP. As part of this process, the federal agency must identify information on eligible or listed historic properties. If a historic property has the potential to be affected by the federal action, the federal agency must determine whether the effect would be adverse. If there is a potential adverse effect, the federal agency must resolve the adverse effect through the consultation process.

A cultural resource is evaluated for eligibility for listing in the National Register according to four criteria. These criteria generally require that the resource be 50 years of age or older and significant at the local, State, or national level according to one or more of the following:

A. It is associated with events that have made a significant contribution to the broad patterns of our history;

B. It is associated with the lives of persons significant in our past;

C. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values, or that represent a significant and distinguishable entity whose components lack individual distinction; and/or

D. It has yielded, or may be likely to yield, information important to prehistory or history.

Properties that are not 50 years of age or older must have "exceptional significance" in accordance with National Register Criteria Considerations. The National Register also requires that a resource possess integrity, which is defined as "the ability of a property to convey its significance." The aspects of integrity are location, design, setting, materials, workmanship, feeling, and association. To determine which of these factors are most important will depend on the particular National Register criterion under which the resource is considered eligible for listing.

The Native American Graves Protection and Repatriation Act (NAGPRA) (25 U.S.C. ch. 32 § 3001 *et seq.*). The NAGPRA describes the rights of Native American lineal descendants, Indian tribes, and Native Hawaiian organizations with respect to the treatment, repatriation, and disposition of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony, referred to collectively in the statute as cultural items, with which they can show a relationship of lineal descent or cultural affiliation. It requires that federal agencies and museums receiving federal funds inventory holdings of Native American human remains and funerary objects and provide written summaries of other cultural items.[24]

4.2.2.2 State Regulations

California Environmental Quality Act (Pub. Res. Code § 21000 *et seq.*). CEQA requires lead agencies to determine whether their projects would have a significant impact on the environment, including significant impacts to historical or unique archaeological resources. CEQA defines a "historical resource" as a resource that meets one or more of the following criteria: (1) listed in, or determined eligible for listing in, the California Register (of Historic Resources); (2) listed in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); (3) identified as significant in a historical resource survey meeting the requirements of Public Resources Code Section 5024.1(g); or (4) determined to be a historical resource by a project's Lead Agency (Pub. Res. Code Section 21084.1 and State CEQA Guidelines Section 15064.5(a)). A historical resource consists of:

> "Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California…. Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing

[24] National Park Service (NPS). The Native American Graves Protection and Repatriation Act (NAGPRA). Website: https://www.nps.gov/archeology/tools/laws/nagpra.htm (accessed January 10, 2024).

on the California Register of Historical Resources" (State CEQA Guidelines Section 15064.5(a)(3)).

In accordance with State CEQA Guidelines Section 15064.5(b), a substantial adverse change in the significance of a historical resource is a significant effect on the environment.

CEQA requires a Lead Agency to determine whether an archaeological cultural resource meets the definition of a historical resource, a unique archaeological resource, or neither (State CEQA Guidelines Section 15064.5(c)). Prior to considering potential impacts, the Lead Agency must determine whether an archaeological cultural resource meets the definition of a historical resource in State CEQA Guidelines Section 15064.5(c)(1). If the archaeological cultural resource meets the definition of a historical resource, it is treated like any other type of historical resource in accordance with State CEQA Guidelines Section 15126.4. Historical resources have the full advantage of mitigation measures, and treatment of historical resources can include documentation of the resource, avoidance measures, measures for preservation in place, and, as a last resort, data recovery for consequential information about the resource. If the archaeological cultural resource does not meet the definition of a historical resource, then the Lead Agency determines whether it meets the definition of a unique archaeological resource as defined in State CEQA Guidelines Section 21083.2(g). In practice, however, most archaeological sites that meet the definition of a unique archaeological resource will also meet the definition of a historical resource. Should the archaeological cultural resource meet the definition of a unique archaeological resource, it must be treated in accordance with State CEQA Guidelines Section 21083.2. If it can be demonstrated that a project will cause damage to a unique archaeological resource, the Lead Agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Treatments for archaeological resources can include, but are not limited to, avoidance measures, capping or covering sites adequately, or planning parks or open space to incorporate archaeological sites. If the archaeological cultural resource does not meet the definition of a historical resource or an archaeological resource, the effects to the resource are not considered significant effects on the environment (State CEQA Guidelines Section 15064.5(c)(4)).

California Health and Safety Code Sections 7050.5. California Health and Safety Code Section 7050.5 states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the Coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the Coroner's authority. If the human remains are of Native American origin, the Coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification. The NAHC will identify a Native American Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

California Register of Historical Resources (Pub. Res. Code Section 5020 *et seq*.). Public Resources Code establishes the State Historical Resources Commission and charges the State Historic Resources Commission with administration of the California Register of Historical Resources (California Register). State law protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources in CEQA documents. A cultural resource is an important historical resource if it meets any of the criteria found in State CEQA Guidelines Section

15064.5(a). These criteria are nearly identical to those for the National Register, which are listed above.

In coordination with the State Historic Resources Commission, the State Office of Historic Preservation (OHP) maintains the California Register. Properties listed on the National Register are automatically listed in the California Register. Properties formally designated eligible for listing on the National Register are nominated to the California Register and then selected to be listed on the California Register, as are State Landmarks and Points of Interest.

The California Register criteria are based on National Register criteria. For a property to be eligible for inclusion in the California Register, one or more of the following criteria must be met:

1. It is associated with the events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;

2. It is associated with the lives of persons important to local, California, or national history;

3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; and/or

4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition to meeting one or more of the above criteria, the California Register requires that sufficient time has passed since a resource's period of significance to "obtain a scholarly perspective on the events or individuals associated with the resource." Fifty years is used as a general estimate of time needed to develop the perspective to understand the resource's significance (California Code of Regulations § 4852[d][2]).

The California Register also requires that a resource possess integrity, which is defined as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance" (OHP 1999:2)[25]. To retain integrity, a resource should have its original location, design, setting, materials, workmanship, feeling, and association. Which of these factors is most important depends on the particular criterion under which the resource is considered eligible for listing.[26]

4.2.2.3 Regional Regulations

There are no regional regulations that are applicable to cultural resources relevant to the proposed project.

[25] California Office of Historic Preservation (OHP). 1999. California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register), OHP Technical Assistance Series #6.

[26] Ibid.

4.2.2.4 Local Regulations

Cypress General Plan. The Conservation/Open Space/Recreation (COSR) Element of the Cypress General Plan identifies goals and policies related to cultural resources (and includes references to paleontological resources). Goal COSR-5 is to "preserve Cypress' archaeologic and palaeontologic resources".[27] COSR-5.1 and COSR-5.2 were identified as policies in order to achieve Goal COSR-5. Policy COSR-5.1 is "to update records of resource finds and locations when required"[28] and COSR-5.2 states that "[p]rior to development in previously undeveloped areas, [the City will] require strict adherence to the CEQA guidelines for environmental documentation and mitigation measures where development will affect archaeological or paleontological resources."[29]

However, the City's General Plan does not identify any historic resources and does not contain any specific policies to protect historic resources. The COSR Element states that a record search was conducted by the Regional Information Center at UCLA on November 1, 1991, and yielded negative results for any recorded prehistoric or historic sites. This search also involved a review of maps from the years 1896, 1942, and 1943 which showed a high volume of development between 1896 and 1942. The COSR also states that the City contains no National Register listed or eligible properties, or State Landmarks.

4.2.3 Existing Environmental Setting

The area that is now Cypress (including the project site) was prehistorically occupied by the Gabrielino-Tongva Indian Tribe. The project site is an approximately 8.53-acre property located north of the intersection of Plaza Drive and Douglas Drive within an urbanized area. The project site is currently developed with a five-story office building and associated surface parking lot.

According to the Phase I ESA prepared for the project, historical aerial photographs indicate that the project site was used for light agricultural purposes from approximately 1938 to the late 1980s, with railroad tracks adjacent to the north. By 1994, the project site was developed with the existing office building, as well as commercial buildings to the north, east, and south. The railroad tracks were also no longer present in 1994. Additional commercial development was completed to the west and south of the project site by 2002. The project site and surrounding areas have largely remained the same since 2002.

4.2.4 Methodology

Historic maps, archival research, and aerial photographs of the project site were analyzed from the Phase I ESA to assess the potential for subsurface historic-period archaeological deposits at the project site.

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27 City of Cypress. 2001. Conservation/Open Space/Recreation Element. Website: https://www.cypressca.org/home/showpublisheddocument/686/636123123792970000 (accessed May 13, 2024).

28 Ibid.

29 Ibid.

4.2.5 Thresholds of Significance

The significance thresholds for impacts to cultural resources used in this analysis are consistent with Appendix G of the State CEQA Guidelines and the City's Initial Study/Environmental Checklist. The proposed project may be deemed to have a significant impact with respect to cultural resources if it would:

Threshold CUL-1: Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Threshold CUL-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Threshold CUL-3: Disturb any human remains, including those interred outside of dedicated cemeteries?

4.2.6 Project Impacts

Threshold CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Impact CUL-1: No Impact. According to the City of Cypress General Plan, there are no known archaeological resources located in Cypress. Further, the SCCIC record search results and field survey identified no previously recorded cultural resources on or in soils on the project site. As such, there are no historical resources as defined in State CEQA Guidelines Section 15064.5 located within the project site. The proposed project would not cause a substantial adverse change in the significance of a historical resource, and no mitigation is required.

Threshold CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Impact CUL-2: Less Than Significant with Mitigation Incorporated. As stated above in Threshold CUL-1, there are no known archaeological resources located in Cypress. There are no National Register listed or eligible properties or State landmarks in the City.[30]

The project site has been previously disturbed to construct an office building and a surface parking lot. The existing office building at the project site would be demolished, materials removed, and the entirety of the site would be graded for the construction of the proposed project. Although the site has been developed and used for nearly 100 years for various operations, there is evidence of a prehistoric presence of Native American tribes in the area. During site preparation/grading activities, there is the potential for inadvertent discovery of unknown archaeological resources.

[30] City of Cypress. General Plan. Conservation/Open Space/Recreation Element. Page COSR-7. Website: https://www.cypressca.org/home/showpublisheddocument/686/636123123792970000 (accessed May 13, 2024).

Mitigation Measure CUL-1 requires that a qualified professional archaeologist provide cultural resources awareness training prior to the commencement of ground-disturbing activities and that a qualified professional archaeologist be retained on-call in the event that construction personnel encounter any archaeological deposits and/or human remains during construction activities. If construction personnel encounter any archaeological deposits during construction activities, the on-call qualified professional archaeologist will be contacted to assess the nature of the find. When archaeological resources are assessed and/or protected as they are discovered, impacts to these resources would be less than significant. As such, implementation of **Mitigation Measure CUL-1** would reduce the impact of the proposed project on the significance of archaeological resources to less than significant.

Threshold CUL-3 **Would the project disturb any human remains, including those interred outside of dedicated cemeteries?**

Impact CUL-3: Less Than Significant Impact. Although no human remains are known to be on the project site or are anticipated to be discovered during project construction, due to ground disturbance there is a possibility of inadvertent discovery of human remains. Disturbing human remains could violate the State's Health and Safety Code as well as destroy the resource. **Regulatory Compliance Measure CUL-1** requires compliance with the State's Health and Safety Code for the treatment of human remains. Adherence to regulatory standards included in **Regulatory Compliance Measure CUL-1** would reduce the impact of the proposed project on human remains to less than significant. No mitigation is required.

4.2.7 Level of Significance Prior to Mitigation

No impacts to historical resources would occur. Prior to mitigation, the proposed project has the potential to result in significant impacts to unknown archaeological resources. With adherence to **Mitigation Measure CUL-1** and **Regulatory Compliance Measure CUL-1**, the project would result in less than significant impacts to previously undiscovered archaeological resources and/or human remains.

4.2.8 Mitigation Measures and Regulatory Compliance Measures

4.2.8.1 Mitigation Measures

Mitigation Measure CUL-1 **Unknown Archaeological Resources.** In the event that archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the Orange County List of Qualified Archaeologists has evaluated the find in accordance with federal, State, and local guidelines to determine whether the find constitutes a "unique archaeological resource," as defined in Section 21083.2(g) of the California Public Resources Code (PRC). The Applicant and its construction contractor shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the project site. Any found deposits shall be treated in accordance with federal, State and local guidelines, including those set forth in

PRC Section 21083.2, and shall be assessed, handled, and treated consistent with accepted standards, such as the Secretary of the Interior's standards and guidelines for archaeology and historic preservation. Prior to commencement of grading activities, the Director of the City of Cypress (City) Community Development Department, or designee, shall verify that all project grading and construction plans include specific requirements regarding California PRC (Section 21083.2[g]) and the treatment of archaeological resources as specified above.

4.2.8.2 Regulatory Compliance Measures

The following regulatory compliance measure is an existing regulation that is applicable to the proposed project and is considered in the analysis of potential impacts related to cultural resources. The City of Cypress considers this requirement to be mandatory; therefore, it is not a mitigation measure.

Regulatory Compliance Measure CUL-1

Cultural Resources Monitoring and Accidental Discovery, Human Remains. In the event that human remains are encountered on the project site, work within 50 feet of the discovery shall be redirected and the County Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the City of Cypress shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Prior to the issuance of grading permits, the Director of the City of Cypress Community Development Department, or designee, shall verify that all grading plans specify the

requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.

4.2.9 Level of Significance after Mitigation

No impacts to historical resources would occur. **Mitigation Measure CUL-1** would reduce potential impacts to unknown archaeological resources to a less than significant level. With adherence to the regulatory standards in **Regulatory Compliance Measure CUL-1**, the project would result in less than significant impacts to previously undiscovered buried human remains. No significant and unavoidable impacts to archaeological resources would occur with implementation of this mitigation measure. After mitigation has been implemented, all anticipated impacts to cultural resources would be considered less than significant.

4.2.10 Cumulative Impacts

Because impacts to cultural resources are typically site specific, the geographic scope of the proposed project for purposes of the cumulative impacts analysis would be the project site and the immediately surrounding area. The proposed project would have no impacts to historical resources. Therefore, when combined with the potential impacts of the past, present, and reasonably foreseeable projects identified in **Table 4.1, Summary of Cumulative Projects**, in Chapter 4.0 of this EIR, the proposed project would not contribute to cumulative impacts.

The cumulative projects all likely involved or would involve some level of ground disturbance with potential for inadvertent discovery of archaeological resources or human remains. As previously discussed, the proposed project would implement **Mitigation Measure CUL-1** in the case of accidental discovery of archaeological resources and **Regulatory Compliance Measure CUL-1** in the event human remains were accidentally discovered. Compliance with these measures would reduce any impacts to these resources associated with the proposed project to less than significant. Similarly, the cumulative projects would be required to comply with applicable laws and regulations pertaining to discovery of these resources. Accordingly, any cumulative impacts would be less than significant.

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4.3 ENERGY

This section discusses energy use resulting from implementation of the 5665 Plaza Drive Project (proposed project) and evaluates whether the proposed project would result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with any applicable plans for renewable energy and energy efficiency.

4.3.1 Scoping Process

The City received 3 comment letters during the public review period for the NOP. For copies of the NOP comment letters, refer to **Appendix A** of this EIR. None of the comment letters included comments related to energy.

4.3.2 Regulatory Setting

4.3.2.1 Federal Regulations

Energy Policy Act of 2005 (16 U.S.C. ch. 46 § 2601 *et seq.*; 42 U.S.C. ch. 134 § 13201 *et seq.*). The Energy Policy Act of 2005 seeks to reduce reliance on non-renewable energy resources and provide incentives to reduce current demand on these resources. For example, under the Act, consumers and businesses can obtain federal tax credits for purchasing fuel-efficient appliances and products (including hybrid vehicles), building energy-efficient buildings, and improving the energy efficiency of commercial buildings. Additionally, tax credits are available for the installation of qualified fuel cells, stationary microturbine power plants, and solar power equipment.

Corporate Average Fuel Economy Standards (49 CFR Parts 531, 533, 536, and 537). On March 31, 2022, the National Highway Traffic Safety Administration (NHTSA) finalized the CAFE standards for Model Years 2024–2026 Passenger Cars and Light Trucks. The amended CAFE standards would require an industry-wide fleet average of approximately 49 miles per gallon (mpg) for passenger cars and light trucks in model year 2026 by increasing fuel efficiency by 8 percent annually for model years 2024–2025, and 10 percent annually for model year 2026. The final standards are estimated to save about 234 billion gallons of gas between model years 2030 and 2050.

Safer Affordable Fuel-Efficient Vehicles Rule (85 Fed. Reg 24174 [April 30, 2020]). In August 2018, the NHTSA and the U.S. Environmental Protection Agency (USEPA) proposed *The Safer Affordable Fuel-Efficient* (SAFE) *Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks* (SAFE Vehicles Rule) to amend the CAFE and GHG emission standards established in 2012 for model years 2021 through 2026. The SAFE Vehicles Rule deceases fuel economy and withdraws the California Waiver for the California Advanced Clean Car program, Zero Emissions Vehicle mandate, and GHG emission standards for model years 2021 through 2026. the final SAFE Vehicles Rule was promulgated in April 2020.

4.3.2.2 State Regulations

Assembly Bill 1575, Warren-Alquist Act (Pub. Resources Code § 25000 *et seq.*). In 1975, largely in response to the oil crisis of the 1970s, the State Legislature adopted Assembly Bill (AB) 1575 (also known as the Warren-Alquist Act), which created the California Energy Commission (CEC). The statutory mission of the CEC is to forecast future energy needs; license power plants of

50 megawatts (MW) or larger; develop energy technologies and renewable energy resources; plan for and direct State responses to energy emergencies; and, perhaps most importantly, promote energy efficiency through the adoption and enforcement of appliance and building energy efficiency standards. AB 1575 also amended Public Resources Code (PRC) Section 21100(b)(3) and State CEQA Guidelines Section 15126.4 to require EIRs to include, where relevant, mitigation measures proposed to minimize the wasteful, inefficient, and unnecessary consumption of energy caused by a project. Thereafter, the State Resources Agency created Appendix F to the State CEQA Guidelines. Appendix F assists EIR preparers in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. Appendix F of the State CEQA Guidelines also states that the goal of conserving energy implies the wise and efficient use of energy and the means of achieving this goal, including (1) decreasing overall per capita energy consumption; (2) decreasing reliance on fossil fuels such as coal, natural gas, and oil; and (3) increasing reliance on renewable energy sources.

Senate Bill 1389, Energy: Planning and Forecasting (Pub. Resources Code § 25300 *et seq*.). In 2002, the State Legislature passed Senate Bill (SB) 1389, which required the CEC to develop an integrated energy plan every two years for electricity, natural gas, and transportation fuels for the California Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero emission vehicles (ZEVs) and their infrastructure needs, and encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

In compliance with the requirements of SB 1389, the CEC adopts an Integrated Energy Policy Report every two years and an update every other year. The most recently adopted report includes the *2023 Integrated Energy Policy Report.*[31] The *Integrated Energy Policy Report* covers a broad range of topics, including decarbonizing buildings, integrating renewables, energy efficiency, energy equity, integrating renewable energy, updates on Southern California electricity reliability, climate adaptation activities for the energy sector, natural gas assessment, transportation energy demand forecast, and the California Energy Demand Forecast. The *Integrated Energy Policy Report* provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs.

Renewable Portfolio Standards (SB 1078; Pub. Util. Code § 399.15). SB 1078 established the California Renewable Portfolio Standards program in 2002. SB 1078 initially required that 20 percent of electricity retail sales be served by renewable resources by 2017; however, this standard has become more stringent over time. In 2006, SB 107 accelerated the standard by requiring that the 20 percent mandate be met by 2010. In April 2011, SB 2 required that 33 percent of electricity retail sales be served by renewable resources by 2020. In 2015, SB 350 established tiered increases to the

[31] CEC. 2023. *2023 Integrated Energy Policy Report Update*. California Energy Commission. Docket Number 23-IEPR-01.

Renewable Portfolio Standards of 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. In 2018, SB 100 increased the requirement to 60 percent by 2030 and required that all State's electricity to come from carbon-free resources by 2045. SB 100 took effect on January 1, 2019.[32]

California Energy Code (Cal. Code Regs tit. 24). Energy consumption by new buildings in California is regulated by the Building Energy Efficiency Standards, in Part 6 of Title 24 of the California Code of Regulations (CCR), known as the Energy Code. The CEC first adopted the Building Energy Efficiency Standards for Residential and Nonresidential Buildings in 1978 in response to a legislative mandate to reduce energy consumption in the State. The Energy Code is updated every three years, with the most recent update consisting of the 2022 Energy Code that became effective on January 1, 2023. Mid-cycle supplements to the 2022 code will become effective on July 1, 2024. The efficiency standards apply to both new construction and rehabilitation of both residential and non-residential buildings, and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings, provided these standards meet or exceed those provided in the Energy Code.

California Green Building Standards Code (CALGreen Code)(Cal. Code Regs tit.24, pt. 11). In 2010, the California Building Standards Commission (CBSC) adopted Part 11 of the Title 24 Building Energy Efficiency Standards, referred to as the California Green Building Standards Code (CALGreen Code). The CALGreen Code took effect on January 1, 2011. The CALGreen Code is updated on a regular basis, with the most recent update consisting of the 2022 CALGreen Code standards that became effective January 1, 2023. The CALGreen Code established mandatory measures for residential and non-residential building construction and encouraged sustainable construction practices in the following five categories: (1) planning and design, (2) energy efficiency, (3) water efficiency and conservation, (4) material conservation and resource efficiency, and (5) indoor environmental quality. Although the CALGreen Code was adopted as part of the State's efforts to reduce GHG emissions, the CALGreen Code standards have co-benefits of reducing energy consumption from residential and non-residential buildings subject to the standard.

California Energy Efficiency Strategic Plan. On September 18, 2008, the California Public Utilities Commission (CPUC) adopted California's first Long-Term Energy Efficiency Strategic Plan, presenting a roadmap for energy efficiency in California (CPUC 2008). The Plan was updated in January 2011 (adopted by the CPUC in D.10-09-047). The Plan articulates a long-term vision and goals for each economic sector and identifies specific near-term, mid-term, and long-term strategies to assist in achieving those goals. The Plan also reiterates the following four specific programmatic goals known as the "Big Bold Energy Efficiency Strategies" that were adopted by the CPUC in Decisions D.07-10-032 and D.07-12-051:

- All new residential construction will be zero net energy (ZNE) by 2020.
- All new commercial construction will be ZNE by 2030.

[32] California Public Utilities Commission (CPUC). 2020. Renewables Portfolio Standard (RPS) Program. Website: https://www.cpuc.ca.gov/rps/ (accessed May 13, 2024).

- 50 percent of commercial buildings will be retrofitted to ZNE by 2030.
- 50 percent of new major renovations of State buildings will be ZNE by 2025.

4.3.2.3 Regional Regulations

There are no regional energy regulations that apply to the proposed project.

4.3.2.4 Local Regulations

Cypress Municipal Code. The City of Cypress has adopted the 2019 California Green Building Standards Code (CALGreen Code) and incorporated the CALGreen Code by reference into the City Municipal Code (Chapter 5, Buildings, Article 1, Building Code, Section 5-1 California Building Codes – Adopted).

Cypress General Plan Conservation/Open Space/Recreation Element. The following goals and policies are applicable to the proposed project:

COSR-3 Conserve energy resources through the use of available technology and conservation practices.

COSR-3.1 Encourage innovative site planning and building designs that minimize energy consumption by taking advantage of sun/shade patterns, prevailing winds, landscaping, and building materials.

COSR-3.2 Encourage new development and existing structures to install energy saving features.

4.3.3 Existing Environmental Setting

4.3.3.1 Electricity

Electrical power is a man-made resource. The production of electricity requires the consumption or conversion of energy resources (including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources) into energy. Electricity is used for a variety of purposes (e.g., lighting, heating, cooling, and refrigeration, and for operating appliances, computers, electronics, machinery, and public transportation systems).[33]

According to the most recent data available from the CEC, in 2022, total electricity generated in California was 287,220 gigawatt-hours (GWh), up 3.4 percent from 2021's total generation of 277,764 GWh.[34] The project site is within the service territory of Southern California Edison (SCE). SCE provides electricity to more than 15 million people in a 50,000-square-mile area of Central,

[33] United States Energy Information Administration (EIA). 2022. Electricity Explained. Website: https://www.eia.gov/energyexplained/electricity/ (accessed May 15, 2024).

[34] California Energy Commission (CEC). 2023. 2022 Total System Electric Generation. Website: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2022-total-system-electric-generation#:~:text=Highlights%20for%202022,(9%2C456%20GWh)%20from%202021. (accessed May 15, 2024).

Coastal, and Southern California.[35] According to the CEC, total electricity consumption in the SCE service area in 2022 was 85,870 GWh. Total electricity consumption in Orange County in 2022 was 20,243.7 GWh (20,243,721,856 kilowatt hours [kWh]).[36]

4.3.3.2 Natural Gas

Natural gas is a non-renewable fossil fuel. Fossil fuels form when layers of decomposing plant and animal matter are exposed to intense heat and pressure under the surface of the Earth over millions of years. Natural gas is a combustible mixture of hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas is found in naturally occurring reservoirs in deep underground rock formations. Natural gas is used for a variety of uses (e.g., heating buildings, generating electricity, and powering appliances such as stoves, washing machines and dryers, gas fireplaces, and gas grills).

Natural gas consumed in California is used for electricity generation (45 percent), residential uses (21 percent), industrial uses (25 percent), and commercial uses (9 percent). California continues to depend on out-of-state imports for nearly 90 percent of its natural gas supply.[37]

The Southern California Gas Company (SoCalGas) is the natural gas service provider for the project site. SoCalGas provides natural gas to approximately 21.8 million people in a 24,000 sq mi service area throughout Central and Southern California, from Visalia to the Mexican border.[38] According to the CEC, total natural gas consumption in the SoCalGas service area in 2022 was 5,026 million therms (1,646 million therms for the industrial sector). Total natural gas consumption in Orange County in 2022 was 572 million therms (352 million therms for the residential sector and 221 million therms for the non-residential sector).[39]

4.3.3.3 Petroleum/Transportation Energy

Petroleum is also a non-renewable fossil fuel. Petroleum is a thick, flammable, yellow-to-black mixture of gaseous, liquid, and solid hydrocarbons that occurs naturally beneath the earth's surface. Petroleum is primarily recovered by oil drilling. It is refined into a large number of consumer products, primarily fuel oil, gasoline, and diesel.

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35 Southern California Edison (SCE). Fact Sheets. Website: https://newsroom.edison.com/fact-sheets/fs (accessed May 15, 2024).

36 CEC. 2019a. California Energy Consumption Database. Website: http://www.ecdms.energy.ca.gov/ (accessed May 15, 2024).

37 CEC. 2021c. Supply and Demand of Natural Gas in California. Website: https://www.energy.ca.gov/data-reports/energy-almanac/californias-natural-gas-market/supply-and-demand-natural-gas-california (accessed May 15, 2024).

38 Southern California Gas Company (SoCalGas). 2020. About SoCalGas. Website: https://www3.socalgas.com/about-us/company-profile (accessed May 15, 2024).

39 CEC. 2019b. Gas Consumption by County. Website: http://www.ecdms.energy.ca.gov/gasbycounty.aspx (accessed May 15, 2023).

The average fuel economy for light-duty vehicles (autos, pickups, vans, and sport utility vehicles) in the United States has steadily increased from about 14.9 miles per gallon (mpg) in 1980 to 22.9 mpg in 2020.[40] Federal fuel economy standards have changed substantially since the Energy Independence and Security Act was passed in 2007. This act, which originally mandated a national fuel economy standard of 35 mpg by year 2020,[41] applies to cars and light trucks of Model Years 2011 through 2020. In March 2020, the United States Environmental Protection Agency and National Highway Traffic Safety Administration (NHTSA) finalized the Corporate Average Fuel Economy (CAFE) standards for Model Years 2024–2026 Passenger Cars and Light Trucks, further detailed below.

Gasoline is the most used transportation fuel in California, with 97 percent of all gasoline being consumed by light-duty cars, pickup trucks, and sport utility vehicles. According to the most recent data available, total gasoline consumption in California was 319,514 thousand barrels or 1,613.5 trillion British thermal units (BTU) in 2021.[42] Of the total gasoline consumption, 302,881 thousand barrels or 1,529.5 trillion BTU were consumed for transportation.[43] Based on fuel consumption obtained from EMFAC2021, 157.1 million gallons of diesel and 1.2 billion gallons of gasoline are estimated to be consumed from vehicle trips in Orange County in 2024.

4.3.4 Methodology

The energy use analysis discussed in this section is based on information from the CalEEMod version 2022.1. modeling results provided in **Appendix C** of this Draft EIR. Operational fuel consumption (diesel fuel and gasoline) from vehicle trips was estimated for the proposed project based on vehicle trip estimates from CalEEMod and fuel efficiencies from the CARB's EMFAC2021 model. Estimates of fuel consumption (diesel fuel and gasoline) from construction trucks and construction worker vehicles were based on trip estimates from CalEEMod and fuel efficiencies from the CARB EMFAC2021 model.

The analysis focuses on the four sources of energy that are relevant to the proposed project: electricity, natural gas, the equipment fuel necessary for project construction, and vehicle fuel necessary for project operations. To assist in the analysis and provide context, the amount of electricity, natural gas, construction fuel, and fuel use from operations are quantified and compared to that consumed in Orange County as a whole. The electricity/natural gas use of the proposed project is analyzed as a whole on an annual basis.

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40 United States Department of Transportation (USDOT). "Table 4-23: Average Fuel Efficiency of U.S. Light Duty Vehicles." Website: https://www.bts.dot.gov/bts/bts/content/average-fuel-efficiency-us-light-duty-vehicles (accessed May 13, 2024).

41 United States Department of Energy. 2007. "Energy Independence & Security Act of 2007." Website: https://www.afdc.energy.gov/laws/eisa (accessed May 13, 2024).

42 A British thermal unit is defined as the amount of heat required to raise the temperature of one pound of water by one degree Fahrenheit.

43 U.S. Energy Information Administration (EIA). 2020. California State Profile and Energy Estimates. Table F3: Motor gasoline consumption, price, and expenditure estimates, 2017. Website: eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_mg.html&sid=CA (accessed May 13, 2024).

4.3.5 Thresholds of Significance

The thresholds for energy impacts used in this analysis are consistent with Appendix G of the State CEQA Guidelines and the City's Initial Study/Environmental Checklist. The proposed project may be deemed to have a significant impact with respect to energy if it would:

Threshold ENG-1: Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Threshold ENG-2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

4.3.6 Project Impacts

Threshold ENG-1: Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impact ENG-1: Less Than Significant Impact. Implementation of the proposed project would increase the demand for energy through day-to-day operations and fuel consumption associated with construction activities. This section discusses energy use resulting from implementation of the proposed project and evaluates whether the proposed project would result in the wasteful, inefficient, or unnecessary consumption of energy resources.

Construction Energy Demands. Construction of the proposed project is anticipated to last approximately 11 months, including a 60-day demolition period, and would require energy for the manufacture and transportation of construction materials, worker commutes, preparation of the site for grading and building activities, and construction of the proposed building. All or most of this energy would be derived from non-renewable resources. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities. Construction of the proposed project would not involve the consumption of natural gas because none of the construction-related equipment would be powered by natural gas. Electricity would be used onsite for lighting, operating construction office equipment, and in use of smaller power tools.

Construction activities are not anticipated to result in an inefficient use of energy because gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the proposed project. Energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. The proposed project would not necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or State. Demolition of the existing buildings and infrastructure onsite would consist of primality of demolition materials which can be recycled. Construction activities would comply with all existing regulations, as required through the City's development permitting process, and would not use large amounts of energy or fuel in a wasteful, inefficient, or unnecessary manner. Therefore, the proposed construction activities would not be considered to be wasteful.

Operational Energy Demands. Energy use consumed by the proposed project would be associated with natural gas use, electricity consumption, and fuel used for vehicle and truck trips associated with the project.

CalEEMod divides building electricity use into uses that are subject to Title 24 standards and those that are not. For electricity, Title 24 uses include the major building envelope systems covered by Part 6 (California Energy Code) of Title 24 (e.g., space heating, space cooling, water heating, and ventilation). Non-Title 24 uses include all other end uses (e.g., appliances, electronics, and other miscellaneous plug-in uses). Because some lighting is not considered as part of the building envelope energy budget, CalEEMod considers lighting as a separate electricity use category.

As described above, the proposed project would result in energy usage associated with gasoline and diesel to fuel project-related trips. Trip generation rates used in CalEEMod for the proposed project were based on the project's trip generation estimates identified in the proposed project's Traffic Analysis (provided in **Appendix E** of this EIR).[44] The proposed project would generate a total of 406 average daily trips (ADT), including 262 passenger vehicle trips, 50 two-axle truck trips, 16 three-axle truck trips, and 78 four-axle truck trips, all of which were included in CalEEMod.

Table 4.3.1 provides the proposed project's estimated annual operational energy usage. The electricity and natural gas rates are from the CalEEMod analysis, while the gasoline and diesel rates are based on the Traffic Analysis in conjunction with United States Department of Transportation (USDOT) fuel efficiency data.

Table 4.3.1: Estimated Annual Energy Use

Land Use	Electricity Use (kWh per year)	Natural Gas Use (therms per year)	Gasoline Consumption (gallons per year)	Diesel Consumption (gallons per year)
Existing Uses				
General Office Building	671,059	**9,545**	**40,436**	**26,013**
Proposed Project				
Refrigerated Warehouse	3,701,189	47,952	33,938	158,778
Parking Lot	76,317	-	-	-
Total Project Energy Usage	**3,777,506**	**47,952**	**33,938**	**158,778**
Total Net Energy Usage	**3,106,447**	**38,407**	**-6,498**	**132,765**

Source: Compiled by LSA (June 2024).
kWh = kilowatt-hour(s)

As shown in **Table 4.3.1**, the estimated potential net increase in electricity demand associated with the operation of the proposed project is 3,106,447 kWh per year. Total electricity consumption in Orange County in 2022 was 20,243.7 GWh or 20,243,721,856 kWh. Therefore, operation of the proposed project would increase the annual electricity consumption in Orange County by less than 0.1 percent.

[44] Urban Crossroads. 2023. *Goodman Commerce Center Traffic Analysis*. November 21, 2023.

Also as shown in **Table 4.3.1**, the estimated potential net increase in natural gas demand associated with the proposed project is 38,407 therms per year. Total natural gas consumption in Orange County in 2022 was 572 million therms (572,454,744 therms). Therefore, operation of the proposed project would negligibly increase the annual natural gas consumption in Orange County by less than 0.1 percent.

Although there would be an overall increase in energy demand associated with the proposed project, the CALGreen Code (California Code of Regulations, Title 24, Part 11), sets performance standards for nonresidential development to reduce environmental impacts and encourage sustainable construction practices. The CALGreen Code addresses energy efficiency, water conservation, materials conservation, planning and design, and overall environmental quality. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Standards Code that became effective on January 1, 2023.

The project would be required to adhere to all federal, State, and local requirements for energy efficiency, including current Title 24 and CALGreen Code standards which establish minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting, which would reduce energy usage. In addition, proposed new development would be constructed using energy efficient modern building materials and construction practices, and the proposed project also would use new modern appliances and equipment, in accordance with the Appliance Efficiency Regulations (Title 20, CCR Sections 1601 through 1608). Title 24 includes requirements for reductions in energy consumption and increasing energy efficiency. Title 24 now has solar installation requirements for all newly constructed non-residential projects. The CBC now mandates incorporation of solar photovoltaic systems and battery storage in many non-residential projects, or for non-qualifying projects installation of solar-ready roofs and systems. These requirements serve to offset electricity demand and the project will be required to adhere to applicable Title 24 requirements. The proposed project's compliance with Title 24 will be confirmed prior to issuance of building permits. The expected energy consumption during construction and operation of the proposed project would be consistent with typical usage rates for industrial uses. In addition, the proposed project would be required to comply with Regulatory Compliance Measure EN-1 which would reduce energy usage on the project site during construction through reducing truck idling times. With implementation of **Regulatory Compliance Measure EN-1**, impacts to energy resources during project construction would be less than significant, and no mitigation is required.

In addition, the proposed project would result in energy usage associated with gasoline and diesel to fuel project-related trips. The average fuel economy for light-duty vehicles (automobiles, pickups, vans, and sport utility vehicles) in the United States has steadily increased, from about 14.9 mpg in 1980 to 22.9 mpg in 2020.[45] The average fuel economy for heavy-duty trucks in the United States

[45] United States Department of Transportation (USDOT). 2021. Table 4-23: Average Fuel Efficiency of U.S. Light Duty Vehicles. Website: www.bts.gov/content/average-fuel-efficiency-us-light-duty-vehicles (accessed May 13, 2024).

has also steadily increased, from 5.7 mpg in 2013 to a 8.0 mpg in 2021.[46] Therefore, using the USEPA fuel economy estimates for 2020, the California diesel fuel economy estimates for 2021, and the traffic data from the Traffic Analysis prepared for the proposed project, the proposed project is estimated to result in the net decrease of approximately 6,498 gallons of gasoline and the net increase of approximately 132,401 of diesel fuel per year from existing conditions. Based on fuel consumption obtained from EMFAC2021, 157.1 million gallons of diesel and 1.2 billion gallons of gasoline are anticipated to be consumed from vehicle trips in Orange County in 2024. Therefore, vehicle and truck trips associated with the proposed project would not increase the annual gasoline fuel use in Orange County and would increase the annual diesel fuel use by approximately 0.1 percent in Orange County. Therefore, operation of the proposed project would represent a very small percentage of the annual gasoline and diesel fuel consumption in Orange County.

Vehicles associated with trips to and from the project site would be subject to fuel economy and efficiency standards, which are applicable throughout the State. As such, the fuel efficiency of vehicles associated with project operations would increase throughout the life of the proposed project. Therefore, implementation of the proposed project would not result in a substantial increase in transportation-related energy uses. The proposed project would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy and would incorporate renewable energy or energy efficiency measures into building design, equipment uses, and transportation. Impacts would be less than significant, and no mitigation measures would be necessary.

Threshold ENG-2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact ENG-2: Less Than Significant Impact. In 2002, the Legislature passed Senate Bill (SB) 1389, which required the CEC to develop an integrated energy plan every two years for electricity, natural gas, and transportation fuels for the California Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero emission vehicles and their infrastructure needs, and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

The CEC recently adopted the *2023 Integrated Energy Policy Report*[47] that provides the results of the CEC's assessments of a variety of energy issues facing California. The City of Cypress relies on the State's integrated energy plan and does not have its own local plan to address renewable energy or energy efficiency.

As indicated above, energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the overall use in the County. In addition,

[46] CEC. 2015. Medium and Heavy-Duty Truck Prices and Fuel Economy 2013–2026. Website: efiling.energy.ca.gov/getdocument.aspx?tn=206180 (accessed May 13, 2024).

[47] CEC. 2023. *2023 Integrated Energy Policy Report Update*. Docket No. 23-IEPR-01.

energy usage associated with operation of the proposed project would be relatively small in comparison to the overall use in Orange County and the State's available energy sources. Therefore, energy impacts at the regional level would be negligible. Because California's energy conservation planning actions are conducted at a regional level, and because the proposed project's total impact on regional energy supplies would be minor, the proposed project would not conflict with or obstruct California's energy conservation plans as described in the CEC's Integrated Energy Policy Report. Additionally, as demonstrated above, the proposed project would not result in the inefficient, wasteful, and unnecessary consumption of energy. Potential impacts related to conflict with or obstruction of a State or local plan for renewable energy or energy efficiency would be less than significant, and no mitigation is required.

4.3.7 Level of Significance Prior to Mitigation

Energy impacts related to the inefficient, wasteful, and unnecessary consumption of energy are considered less than significant, and no mitigation is required.

4.3.8 Regulatory Compliance Measures and Mitigation Measures

4.3.8.1 Regulatory Compliance Measures

The following regulatory compliance measure includes existing regulations that are applicable to the proposed project and are considered in the analysis of potential impacts related to energy. The City of Cypress considers these requirements to be mandatory; therefore, they are not mitigation measures.

Regulatory Compliance Measure EN-1 **Limit Idling Time.** The Applicant and construction contractor would be required to comply with applicable idling regulations for on-road vehicles during project construction and operation, which require truck drivers to turn off their engines within five minutes of idling.

4.3.8.2 Mitigation Measures

No mitigation is required for the proposed project.

4.3.9 Level of Significance after Mitigation

Construction and operational impacts related to energy use would be less than significant. No mitigation is required.

4.3.10 Cumulative Impacts

The geographic area for cumulative analysis of electricity is that of the SCE service area, while the geographic area for cumulative analysis of natural gas service is that of the SoCalGas service area. Construction and operation of the proposed project would result in an increased demand for electricity and natural gas service. However, this increase would be minimal and would not require SCE to expand or construct infrastructure that could cause substantial environmental impacts. The proposed project would not result in the demand for natural gas during construction; however, operation of the proposed project would increase on-site natural gas demand. As discussed previously, the estimated potential net increase in electricity demand associated with the operation

of the proposed project is 3,106,447 kWh per year. Total electricity consumption in Orange County in 2022 was 20,243.7 GWh or 20,243,721,856 kWh and operation of the proposed project would increase the annual electricity consumption in Orange County by less than 0.1 percent. By 2030, consumption in Orange County is anticipated to increase by 12,000 GWh for the low-demand scenario and by 22,000 GWh for the high-demand scenario.[48] While this forecast represents a large increase in electricity consumption, the proposed project's share of cumulative consumption would be negligible. Energy use associated with the proposed project, in combination with energy use from the cumulative projects, would be within SCE's system-wide net annual increase in electricity supplies over the 2018 to 2030 period, and there are sufficient planned electricity supplies in the region for estimated net increases in energy demands.

The estimated potential net increase in natural gas demand associated with proposed project operations is 38,407 therms per year. Development of the cumulative projects is not anticipated to require additional natural gas infrastructure or result in a substantial increase in demand. Total natural gas consumption in the SoCalGas service area in 2022 was 5,026 million therms (1,646 million therms for the industrial sector). Total natural gas consumption in Orange County in 2022 was 572 million therms (352 million therms for the residential sector and 221 million therms for the non-residential sector).[49] Per SoCalGas's forecast, total natural gas consumption in the SoCalGas service area is expected to remain steady through 2030 for low- and mid-demand scenarios and to increase by approximately 650 million therms under a high-demand scenario due to intense energy efficiency efforts.[50] Proposed project operations would negligibly increase the annual natural gas consumption in Orange County by less than 0.1 percent. It is anticipated that SoCalGas would be able to meet the natural gas demand of the proposed project and the cumulative projects without the need to develop additional facilities. In addition, both SCE and SoCalGas demand forecasts include the growth contemplated by the proposed project and the cumulative projects within their respective service areas. Increased energy efficiency to comply with building energy efficiency standards would reduce energy consumption on a per-square-foot basis. Furthermore, utility companies are required to increase their renewable energy sources to meet the Renewable Portfolio Standards mandate of 60 percent renewable supplies by 2030. SCE and SoCalGas plan to continue to provide reliable service to their customers and upgrade their distribution systems as necessary to meet future demand.

In addition, the proposed project would include energy usage associated with gasoline and diesel to fuel project-related trips. The proposed project is estimated to result in a net decrease of approximately 6,498 gallons of gasoline and a net increase of approximately 132,401 of diesel fuel per year compared to existing conditions. However, those figures are based on existing average

[48] CEC. 2018. *California Energy Demand, 2018–2030 Revised Forecast*. Publication Number: CEC-200-2018-002-CMF. February. Website: https://efiling.energy.ca.gov/getdocument.aspx?tn=223244 (accessed May 13, 2024).

[49] CEC. 2019b. Gas Consumption by County. Website: http://www.ecdms.energy.ca.gov/gasbycounty.aspx (accessed May 13, 2024).

[50] CEC. 2018. *California Energy Demand, 2018–2030 Revised Forecast*. Publication Number: CEC-200-2018-002-CMF. February. Website: https://efiling.energy.ca.gov/getdocument.aspx?tn=223244 (accessed May 13, 2024).

truck fleet demands, which are anticipated to decrease with improvements in heavy duty engine efficiency and transitions to electrification, consistent with regulatory requirements such as the California Advanced Clean Truck Rule. The project would be designed to facilitate achievement of those goals and would not obstruct their implementation. Based on fuel consumption data obtained from EMFAC2021, 157.1 million gallons of diesel and 1.2 billion gallons of gasoline are anticipated to be consumed from vehicle trips in Orange County in 2024. Therefore, vehicle and truck trips associated with the proposed project would not increase the annual gasoline fuel use in Orange County and would increase the annual diesel fuel use by approximately 0.1 percent in Orange County. Therefore, operation of the proposed project would represent a very small percentage of the annual gasoline and diesel fuel consumption in Orange County.

Compliance with **Regulatory Compliance Measure EN-1** would help ensure that the proposed project does not result in an inefficient, wasteful, and unnecessary consumption of energy. Therefore, the proposed project's contribution to impacts related to the inefficient, wasteful, and unnecessary consumption of energy would not be cumulatively considerable, and no mitigation is required.

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4.4 GEOLOGY AND SOILS

This section provides a discussion of the existing geology and soils setting and an analysis of the 5665 Plaza Drive Project's (proposed project) potential geology and soils impacts. This section also addresses potential impacts due to the local geology underlying the project site, as well as slope stability, ground settlement, soil conditions, grading, and regional and local seismic conditions. This section also evaluates potential impacts to paleontological resources. This section summarizes information provided in the *Geotechnical Investigation and Report Update for Proposed Goodman Commerce Center, 5665 and 5757 Plaza Drive* (Geotechnical Evaluation), conducted by G3SoilWorks in August 2023, and provided in **Appendix F** of this Draft EIR. This section also incorporates data from the City of Cypress General Plan,[51] numerous State and federal studies of geologic and seismic hazards in the vicinity of the City, site-specific investigations in the project site, and field observations.

4.4.1 Scoping Process

The City received 3 comment letters during the public review period for the NOP. For copies of the NOP comment letters, refer to **Appendix A** of this Draft EIR. None of the comment letters included comments related to geology.

4.4.2 Regulatory Setting

4.4.2.1 Federal Regulations

There are no federal policies or regulations related to geology and soils that are applicable to the proposed project.

4.4.2.2 State Regulations

Alquist-Priolo Earthquake Fault Zoning Act (1972) (Pub. Resources Code § 2621 *et seq*.). The Alquist-Priolo Earthquake Fault Zoning Act of 1972 and updates (Pub. Resources Code, Section 2621, *et seq.)* is the principal California State guidance to prevent the construction of habitable structures on the surface trace of active earthquake faults. If an active fault is found, a structure for human occupancy must be set back from the fault (generally 50 feet). The Alquist-Priolo Earthquake Fault Zoning Act only addresses the hazard of surface fault rupture; it does not consider other earthquake hazards. There are no known earthquake fault zones on or in the near vicinity of the project site; therefore, regulations recommended by the California Geological Survey (CGS) for investigations conducted in such zones do not specifically apply.

Seismic Hazard Mapping Act (1990) (Pub. Resources Code §§ 2690-2699.6). The Seismic Hazard Mapping Act (SHMA) was adopted by the State in 1990 to address the potential hazards posed by secondary effects of seismic activity, including strong ground shaking, soil liquefaction, and associated ground failure and seismically induced landslides. The CGS prepares and provides local governments with seismic hazard zone maps that identify areas susceptible to amplified shaking, liquefaction, earthquake-induced landslides, and other ground failures. The seismic hazard zones are referred to as "zones of required investigation" because site-specific geological investigations are required for construction projects located within these areas. Before a project can be permitted, a

[51] City of Cypress. 2001. General Plan City of Cypress General Plan, Safety Element.

geologic investigation, evaluation, and written report must be prepared by a licensed geologist to demonstrate that the potential hazards can be successfully mitigated.

Public Resources Code. Section 5097.5 of the PRC provides for the protection of cultural and paleontological resources and prohibits the removal, destruction, injury, or defacement of archaeological and paleontological features on any lands under the jurisdiction of State or local authorities.

4.4.2.3 Regional Regulations

There are no regional policies or regulations related to geology and soils that are applicable to the proposed project.

4.4.2.4 Local Regulations

City of Cypress Municipal Code. Building and construction in the City are subject to the regulations of the City of Cypress Municipal Code. California Code of Regulations (CCR), Title 24, Part 2, the California Building Code (CBC) (2019), provides minimum standards for building design in the State. Local codes are permitted to be more restrictive than Title 24, but not less restrictive. The procedures and limitations for the design of structures are based on site characteristics, occupancy type, configuration, structural system height, and seismic design category. The seismic ratings used in the CBC are derived from the International Building Code specifications. Most of coastal Southern California, including the project site, is located in Seismic Design Category D. Construction activities are subject to occupational safety standards for excavation, shoring, and trenching as specified in the California Occupational Safety and Health Administration (Cal/OSHA) regulations (CCR, Title 8). In addition, the proposed project would adhere to the regulatory standards described in Regulatory Compliance Measure GEO-1, provided below, which includes the seismic and building standards in the City's Building Code, that adopt the CBC with amendments and modifications.

City of Cypress General Plan Conservation/Open Space/Recreation Element. The existing City of Cypress General Plan identifies goals and policies related to paleontological resources. Goal COSR-5 in the Conservation/Open Space/Recreation Element (2000) of the City's General Plan addresses paleontological resources (and potential resources) and indicates that conservation of the resources and investigation of potential resource areas is an important undertaking for connecting with the community's past.

The following goal and policies apply to the proposed project:

COSR-5 Preserve Cypress' archaeologic and paleontological resources.

COSR-5.1 Update records of resource finds and locations when required.

COSR-5.2 Prior to development in previously undeveloped areas, require strict adherence to the CEQA guidelines for environmental documentation and mitigation measures where development will affect archaeological or paleontological resources.

4.4.3 Existing Environmental Setting

4.4.3.1 Project Site

According to the Geotechnical Evaluation, the topography of the site is relatively flat to very gently sloping. Site elevations in feet above the North American Vertical Datum of 1988 (NAVD88) are estimated to range from approximately 38 feet above mean sea level (amsl) near the northeast and southeast corners of the site, approximately 39 feet amsl near the center of the site, and approximately 35–36 feet amsl near the northwest and southwest corners of the site, respectively.

4.4.3.2 Regional Geology

The project site is located within the Los Angeles Basin, a northwest-trending alluviated lowland situated at the north end of the Peninsular Ranges geomorphic province of coastal Southern California. The Los Angeles Basin is subdivided into four primary structural blocks that are distinguished from one another by contrasting basement rock types and stratigraphy. More specifically, the project site is located within the east-central portion of the Downey Plain, a broad lowland area that comprises a large portion of the Central Block of the Los Angeles Basin. This plain is bounded by the Santa Monica Mountains to the north, the Puente Hills and Santa Ana Mountains to the northeast and east, and a northwest-trending alignment of hills and mesas to the west and southwest.

In the area of the project site, the soils that form this extensive alluvial plain are composed primarily of geologically young materials deposited as a result of sedimentation along the Santa Ana and San Gabriel Rivers, with additional materials contributed from smaller canyons that drain the adjoining upland areas to the northeast.

4.4.3.3 Local Geology and Subsurface Conditions

The area occupied by the southern portion of the City of Cypress is underlain by unconsolidated, generally fine-grained, Holocene-age alluvial floodplain deposits composed primarily of various combinations of silt, sand, and clay. Underlying these Holocene alluvial deposits are older, semiconsolidated to consolidated Quaternary-age sediments that extend to depths of 2,700 feet to greater than 4,200 feet below the surface.

The subsurface investigation revealed that the project site is generally underlain with shallow fills and Quaternary alluvial deposits. Borings at the project site encountered Artificial fill within the upper 5 feet below ground surface, consisting of dark grayish brown, moist to very moist, medium-dense, silty sands. Native alluvial materials were encountered at depths below 5 feet below ground surface, consisting of very moist to wet silty sands / sandy silts with interbeds / discontinuous lenses of clayey silt. Silty clay and poorly graded sands were encountered between depths of 35 and 40 feet below ground surface.

4.4.3.4 Local Groundwater Conditions

Information pertaining to the occurrence of groundwater within inland portions of Orange County has primarily been obtained from borehole logs prepared during installation of the numerous water wells throughout the area. In the City and surrounding areas, groundwater may occur within the upper 40 to 50 feet of Holocene-age sediments. This water typically occurs within thin layers of silty sand and sand at depths of between 5 and 50 feet below the surface.

According to the Geotechnical Evaluation, groundwater was encountered at depths of 6 to 9 feet below the ground surface, indicating the presence of shallow groundwater conditions at the project site. Borings B-1 through B-5 encountered groundwater at depths 7 to 8 feet below ground surface, which is consistent with previous investigations conducted by Southern California Geotechnical (SCG), reporting groundwater depths from 5 to 9.5 feet at various boring locations. In 2022, groundwater monitoring wells were installed at depths of 6.4 to 8.8 feet below ground surface which indicated fluctuating water levels, with shallow groundwater conditions persisting across the site. During periods of heavy rainfall or "wet" rainy seasons, the groundwater elevation may rise, potentially resulting in mounding in areas of concentrated influx.

4.4.3.5 Fault Systems and Seismic Conditions

A potentially active fault is defined by the State as a fault with a history of movement within Pleistocene time (between 11,000 and 1.6 million years ago [Ma]). The active and potentially active faults are capable of producing potentially strong seismic shaking at the project site. It is anticipated that the project site will periodically experience ground acceleration as a result of earthquakes. The closest mapped active faults to the project site include the Newport-Inglewood and Whittier fault zones located approximately 5.1 miles southwest and 11.6 miles northeast of the project site, respectively.

No portion of the project site or larger study area in the Geotechnical Evaluation is located within the boundaries of an “Earthquake Fault Zone,” as defined by the State of California in the Alquist-Priolo Earthquake Fault Zoning Act. Furthermore, the Cypress General Plan Safety Element (2001) indicates that no active faults have been identified within City boundaries.

Seismic shaking is characterized by the physical movement of the land surface during and subsequent to an earthquake. Seismic shaking has the potential to cause destruction and damage to buildings and property, including damage resulting from damaged or destroyed gas or electrical utility lines, disruption of surface drainage, blockage of surface seepage and groundwater flow, changes in groundwater flow, dislocation of street alignments, displacement of drainage channels and drains and possible loss of life. In addition, ground shaking can induce several kinds of secondary seismic effects, including liquefaction, differential settlement, and landslides.

The intensity of seismic shaking during an earthquake depends largely on the geologic foundation conditions of the materials composing the upper several hundred feet of the Earth’s surface. The greatest amplitudes and longest durations of ground shaking occur on thick, water-saturated, unconsolidated alluvial sediments, which may lead to liquefaction (as further described below). Ground shaking can also cause ground failure or deformation due to lurching and liquefaction.

Surface fault rupture refers to the displacement of the ground surface along a fault, which can occur during strong earthquakes. The potential for seismic hazards at the project site is a consequence of ground shaking caused by events on nearby active faults. However, as previously discussed, the project site is not located within a designated Alquist-Priolo Earthquake Fault Zone, so the possibility for surface fault rupture is low. The project site is, however, located approximately 5.1 miles to the northeast of an earthquake fault zone that has been established around the active traces of the Newport-Inglewood Fault.

4.4.3.6 Liquefaction and Lateral Spreading

Liquefaction occurs when saturated, cohesionless soils temporarily lose shear strength (liquefy) due to increased pore water pressures induced by strong ground motion during an earthquake. Intervals of loose sand may, therefore, be subject to liquefaction if these materials are or were to become submerged and also exposed to strong seismic ground shaking. Seismic ground shaking of relatively loose, granular soils that are saturated or submerged can cause the soils to liquefy and temporarily behave as a dense fluid. This loss of support can produce local ground failure such as settlement or lateral spreading that may damage overlying improvements.

Lateral spreading typically occurs as a form of horizontal displacement of relatively flat-lying alluvial material toward an open or "unconfined" face such as an open body of water, channel, or excavation. In soils, this movement is generally due to failure along a weak plane and is often associated with liquefaction. The Safety Element of the City's General Plan also identifies the project site as an area at a potentially high risk of liquefaction.

As discussed in the Geotechnical Evaluation, the project site is located in Liquefaction Hazards Zone of required investigations. Subsurface explorations found the presence of potentially liquefiable soils to depths of 50 feet, indicating the potential for dynamic settlements ranging from 2.90 inches to 5.27 inches during severe seismic events. Given the nature and size of the proposed development, differential settlements under current conditions could be significant.

4.4.3.7 Subsidence

The phenomenon of widespread land sinking, or subsidence, is generally related to substantial over pumping of groundwater or petroleum reserves from deep underground reservoirs. Like most of northern Orange County, the City lies atop the Orange County Groundwater Basin (Orange County Basin). Although slight subsidence has been observed elsewhere in the Orange County Basin in Santa Ana (likely due to groundwater withdrawal) and in the Huntington Beach area (likely due to oil withdrawal), there is no recent history of subsidence in the project vicinity.[52] Groundwater levels and storage in the Orange County Basin are managed by the Orange County Water District (OCWD) in a manner that reduces the potential for land subsidence to occur.

4.4.3.8 Compressible/Collapsible Soils

Compressible soils are soils that consolidate when exposed to new loading, such as Artificial Fill or foundation loads. Soil collapse occurs when soils substantially decrease in volume following an increase in moisture content. The results of the subsurface investigation within the project site, as well as investigations conducted for previous reports, indicated that the majority of the project site is underlain by artificial fill in the upper to 5 feet below the surface. Native alluvial soils were encountered below approximately 5 feet below ground surface and generally consisted of interbedded layers of sandy silts with discontinuous lenses of clayey silt. A distinct widespread layer of clayey silt/silty clay was encountered at depths between 15 feet and 32 feet, in Borings B-1

[52] Metropolitan Water District of Southern California. 2007. Groundwater Assessment Study, Chapter IV – Groundwater Basin Reports, Orange County Basins – Orange County Basin, September.

through B-5. At depths between 35 to 40 feet poorly graded sands noted were encountered at the boring locations.

4.4.4 Methodology

To assess the impacts of the proposed project with respect to geologic and soil conditions, G3SoilWorks conducted a Geotechnical investigation and field explorations in May 2022. Additionally previous studies for the proposed project were performed by SCG in June 2021. The discussion below describes the scope of the exploration, including methods used during site reconnaissance and the results of pertinent prior explorations, laboratory tests, and engineering analyses.

4.4.4.1 Background Research and Data Review

Existing geologic literature (i.e., geologic maps, boring logs, and other applicable data) was reviewed by G3SoilWorks.

4.4.4.2 Site Reconnaissance

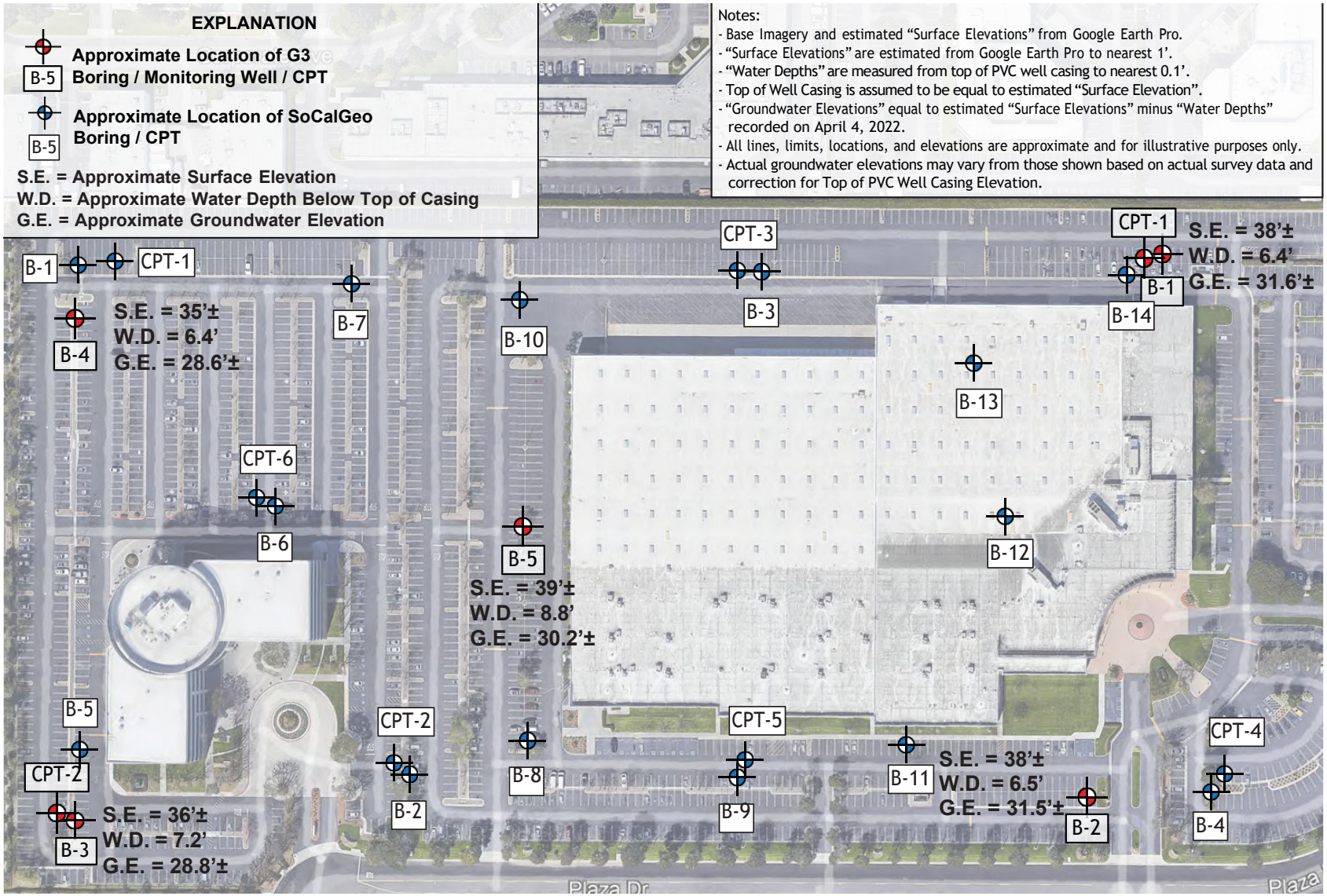
A site reconnaissance and a subsurface exploration of the project site were conducted by G3SoilWork. This included marking exploration and test locations for geology and soils that were analyzed in the Geotechnical Evaluation.

4.4.4.3 Geotechnical Laboratory Testing/Analysis

A field investigation was conducted by G3SoilWorks to identify subsurface conditions on the project site related to soil types, groundwater, liquefaction, corrosive soils, settlement, and the potential need for remedial grading. As part of these field investigations, a total of 5 borings were completed to depths of 25 to 51.5 feet below existing grade utilizing a truck- mounted drilling rig equipped with an 8-inch diameter hollow-stem auger, and associated soil sampling and logging by a geologist and engineer to substantiate the subsurface findings reported by the previous consultant and obtain additional subsurface information. A total of five (5) monitoring wells were installed to determine static water levels and provide a means of groundwater monitoring in advance of and during construction. A review of the liquefaction analyses performed by the previous consultant and the performance of two (2) additional Cone Penetrometer Tests to depths of 50 feet below grade for liquefaction evaluation. All boring sites and CPT locations are shown in **Figure 4.4.1**, **Boring and CPT Locations.**

4.4.5 Thresholds of Significance

The thresholds for geology and soils impacts used in this analysis are consistent with Appendix G of the State CEQA Guidelines and the City's Initial Study/Environmental Checklist. The proposed project may be deemed to have a significant impact with respect to geology and soils if it would:



LSA

FIGURE 4.4.1

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FEET

SOURCE: G3 SoilWorks

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5665 Plaza Drive Project Draft Environmental Impact Report

Boring and CPT Locations

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Threshold GEO-1: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

(i): Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidences of known fault? (Refer to Division of Mines and Geology Special Publication 42)

(ii): Strong seismic ground shaking?

(iii): Seismic-related ground failure, including liquefaction?

(iv): Landslides?

Threshold GEO-2: Result in substantial soil erosion or the loss of topsoil?

Threshold GEO-3: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-site or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse?

Threshold GEO-4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating direct or indirect substantial risks to life or property?

Threshold GEO-5: Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Threshold GEO-6: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

4.4.6 Project Impacts

Threshold GEO-1(i): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidences of known fault? (Refer to Division of Mines and Geology Special Publication 42)

Impact GEO-1(i): No Impact. According to the Geotechnical Evaluation, active faults do not appear to be present under or in close proximity to the project site. Additionally, according to the California Geological Survey's EQ Zapp: California Earthquake Hazards Zone Application (EQ Zapp web-based application), the Newport-Inglewood and Whittier Fault Zones are the nearest fault zones located approximately 5.1 miles southwest and 11.6 miles northeast of the project site, respectively. Therefore, surface rupture is not anticipated to occur within the project site or surrounding vicinity. No impact would occur, and no mitigation is required.

Threshold GEO-1(ii): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?

Impact GEO-1(ii): Less Than Significant Impact. As mentioned above, the Geotechnical Evaluation determined no evidence of active faults to be present under or in close proximity to the project site. However, incidental ground cracking and other ground shaking phenomena can occur due to high seismic accelerations and regional seismic activity. Thus, it was determined in the Geotechnical Evaluation that risks associated with seismic shaking and strong ground motion are considered to be moderate.

As specified in **Regulatory Compliance Measure GEO-1,** below, the proposed project's building would be subject to the seismic design criteria of the most current CBC requirements that aim to prevent building collapse and reduce the impacts of seismic ground shaking. Adherence to these requirements would address injury and loss of life and building damage after an earthquake. Therefore, with the implementation of **Regulatory Compliance Measure GEO-**1, impacts related to seismic ground shaking would be less than significant, and no mitigation is required. It should also be noted that the project is subject to Mitigation Measure GEO-1, which requires implementation of the recommendations of the Geotechnical Evaluation.

Threshold GEO-1(iii): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?

Impact GEO-1(iii): Less Than Significant with Mitigation Incorporated. Soil liquefaction is a phenomenon in which cyclic stresses, produced by earthquake-induced ground motion, create excess pore pressures in relatively cohesionless and low plastic soils. These soils may thereby acquire a high degree of mobility, which can lead to lateral movement, sliding, consolidation and settlement of loose sediments, sand boils, and other damaging deformations. This phenomenon occurs only below the water table; however, after liquefaction has developed, the effects can propagate upward into overlying non-saturated soil as excess pore water dissipates.

The factors known to influence liquefaction potential include soil type and grain size, relative density, groundwater level, confining pressures, and both intensity and duration of ground shaking. In general, materials that are susceptible to liquefaction are loose, saturated granular soils having low fine content under low confining pressures and some low plastic silts and clays.

According to the California Geological Survey's EQ Zapp, the project site is located in a Liquefaction Hazards Zone of required investigations. The Geotechnical Evaluation included a subsurface exploration and has determined the presence of potentially liquefiable soils to depths of 50 feet. Further analysis determined potential dynamic settlements of approximately 2.9 inches to 5.27 inches during a strong seismic event.

This dynamic settlement as a result of severe seismic activity is expected to occur over a large area and would result in areal subsidence, and the potential differential settlement is expected to be significantly less over any relatively small segment. However, given the nature of the proposed project, which includes a light industrial facility with office and warehouse uses, differential

settlements under current conditions could be significant. Thus, remedial grading, foundation considerations, and/or in-situ ground improvement measures are recommended in the Geotechnical Evaluation to help mitigate potential adverse effects due to soil liquefaction.

Mitigation Measure GEO-1, provided below, requires the construction contractor to comply with the recommendations in the Geotechnical Evaluation to reduce the proposed project's impact related to liquefaction. Therefore, with implementation of **Mitigation Measure GEO-1,** the proposed project's impacts related to liquefaction would be reduced to less than significant. The project would also be required to adhere to **Regulatory Compliance Measure GEO-1**.

Threshold GEO-1(iv): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?

Impact GEO-1(iv): No Impact. According to the City's General Plan Safety Element (2001), no significant topographic features exist within the City. Further, according to the Geotechnical Evaluation, the topography of the site is relatively flat to very gently sloping. Site elevations in feet above the NAVD88 are estimated to range from approximately 38 feet amsl near the northeast and southeast corners of the site, approximately 39 feet amsl near the center of the site, and approximately 35–36 feet amsl near the northwest and southwest corners of the site, respectively. Evidence of ancient landslides or slope instabilities were not observed at the project site. Both the project site and surrounding properties are flat with no unusual geographic features, and therefore, neither the project site nor the surrounding area has the potential for impacts related to landslides. No mitigation is required.

Threshold GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Impact GEO-2: Less Than Significant Impact. During project construction activities, soil would be exposed and disturbed, drainage patterns would be temporarily altered during grading and other construction activities, and there would be an increased potential for soil erosion and siltation compared to existing conditions. However, as described in Section 4.10, Hydrology and Water Quality, the Construction General Permit requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) (see **Regulatory Compliance Measure HYD-1** in that section). The SWPPP would detail Erosion Control and Sediment Control Best Management Practices (BMPs) to be implemented during project construction to minimize erosion and retain sediment on site. With compliance with the requirements of the Construction General Permit and with implementation of the construction BMPs, construction impacts related to substantial soil erosion and loss of topsoil would be less than significant. Following construction, the project site would be covered with the proposed buildings, paving, and landscaping. Therefore, operation of the proposed project would not result in substantial soil erosion or loss of topsoil. Potential soil erosion impacts related to construction activities would be less than significant with adherence to the required regulations discussed above. Operation of the proposed project would result in no impacts related to soil erosion or loss of topsoil. No mitigation is required.

Threshold GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-site or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse?

4.4.6.1 Landslides and Unstable Slopes

Impact GEO-3: Less Than Significant Impact. Landslides and other forms of mass wasting, including mud flows, debris flows, and soil slips, occur as soil moves downslope under the influence of gravity. Landslides are frequently triggered by intense rainfall or seismic shaking. Because the project site is in a flat area, landslides or other forms of natural slope instability do not represent a significant hazard to the project site or the surrounding area. In addition, as discussed under Threshold GEO-1(iv), the site is not within an area susceptible to landslides as both the project site and surrounding properties are flat with no unusual geographic features. Therefore, potential impacts related to landslides would be less than significant, and no mitigation is required.

4.4.6.2 Lateral Spreading

Impact GEO-3: Less Than Significant Impact. Lateral spreading often occurs on very gentle slopes or flat terrain. The dominant mode of movement is lateral extension accompanied by shear or tensile fracture. This failure is caused by liquefaction and is usually triggered by rapid ground motion, such as that experienced during an earthquake, but can also be artificially induced. When coherent material, either bedrock or soil, rests on materials that liquefy, the upper units may undergo fracturing and extension and may then subside, translate, rotate, disintegrate, or liquefy and flow. The Geotechnical Evaluation indicates that heavy lateral spreading is considered a low risk while ground cracking displacements, and localized spread is considered a moderate risk. These risks would be reduced by the implementation of **Regulatory Compliance Measure GEO-1**, which would include ground treatment and dewatering, as well as providing a capping of engineered fill. Therefore, potential impacts related to lateral spreading would be less than significant, and no mitigation is required.

4.4.6.3 Subsidence

Impact GEO-3: Less Than Significant Impact. Subsidence refers to broad-scale changes in the elevation of land. Common causes of land subsidence are pumping water, oil, and gas from underground reservoirs; dissolution of limestone aquifers (sinkholes); collapse of underground mines; drainage of organic soils; and initial wetting of dry soils (hydrocompaction). Subsidence may also be caused by heavy loads generated by large earthmoving equipment. As stated in the Geotechnical Evaluation, dynamic settlement as a result of liquefaction is expected to occur over a large area and would result in areal subsidence, and the potential differential settlement is expected to be significantly less over any relatively small segment. As specified in **Regulatory Compliance Measure GEO-1**, the proposed project's buildings would be subject to the seismic design criteria of the most current CBC requirements that aim to prevent building collapse and reduce the impacts of seismic ground shaking. Adherence to these requirements would address injury and loss of life and building damage during and after an earthquake. The proposed project's compliance with the most current CBC requirements would also reduce the project's impacts related to subsidence. Adherence to these requirements would address the removal and replacement of site soils. Therefore, with the

implementation of **Regulatory Compliance Measure GEO-1**, impacts related to seismic ground shaking would be less than significant, and no mitigation is required.

4.4.6.4 Liquefaction and Compressible/Collapsible Soils

Impact GEO-3: Less Than Significant with Mitigation Incorporated. As discussed in detail under Threshold GEO-1(iii) above, implementation of **Mitigation Measure GEO-1** and adherence to the regulatory standards described in **Regulatory Compliance Measure GEO-1** would be required to address the proposed project's impacts with respect to liquefaction. Provided that design and remedial grading and ground improvement (as necessary) are performed in accordance with the applicable requirements in the CBC (adopted by the City as its Building Code with certain amendments), and current standards of practice in the area, excessive settlement resulting from liquefaction and compression of existing undocumented fill and some layers of loose sands and silty sands on the project site would be reduced to a less than significant level.

Threshold GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating direct or indirect substantial risks to life or property?

Impact GEO-4: Less Than Significant Impact. According to the Geotechnical Evaluation prepared for the proposed project, surface site soils had a "very low" potential for expansion. No recommendations are provided in the Geotechnical Evaluation related to expansive soils due to this very low potential. Therefore, impacts related to expansive soils for the proposed project would be less than significant. No mitigation is required.

Threshold GEO-5: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Impact GEO-5: No Impact. The proposed project would not include the use of septic tanks or alternative wastewater disposal systems because sanitary sewer and wastewater facilities are available in the vicinity of the project site. Therefore, the project would have no impact with respect to septic tanks or alternative wastewater disposal systems. No mitigation is required.

Threshold GEO-6: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact GEO-6: Less Than Significant with Mitigation Incorporated. The project site contains Artificial Fill, which has no paleontological sensitivity, and Young Alluvium, Unit 2, which has low paleontological sensitivity from the surface to a depth of 10 feet and high paleontological sensitivity below 10 feet. With a maximum excavation depth of 8 feet during construction, the proposed project is expected to remain in deposits with no or low paleontological sensitivity. However, in the event that paleontological resources are encountered during construction, **Mitigation Measure GEO-2**, detailed below, would require work in the immediate area of the discovery to be halted and a qualified paleontologist to assess the discovery. These procedures would reduce potential impacts to scientifically significant nonrenewable paleontological resources encountered during construction.

4.4.7 Level of Significance Prior to Mitigation

The potential for surface fault rupture, erosion, subsidence, landslides, lateral spreading, and expansive soil is less than significant, and no mitigation is required. The potential impacts related to seismic shaking, liquefaction, and settlement due to compressible and wet soils would be potentially significant prior to mitigation. The proposed project would also have potentially significant impacts on paleontological resources prior to the implementation of mitigation.

4.4.8 Regulatory Compliance Measures and Mitigation Measures

4.4.8.1 Regulatory Compliance Measures

The following regulatory compliance measure is a requirement of the CBC that is applicable to the proposed project and is considered in the analysis of potential impacts related to geology and soils. The City of Cypress considers this requirement to be mandatory; therefore, it is not a mitigation measure.

Regulatory Compliance Measure GEO-1 **Compliance with Seismic and Standards in the Building Code.** Prior to issuance of the first building permit for the proposed buildings, the City of Cypress (City) Engineer, Building Official, or their designee, and the project soils engineer shall review the building plans to verify that the structural design conforms to the requirements of the City's latest adopted edition of the California Building Standards Code. Structures and walls shall be designed in accordance with applicable sections of the City's Building Code.

4.4.8.2 Mitigation Measures

In addition to the regulatory requirements described above, the following mitigation measures would reduce potential impacts related to seismic ground shaking, liquefaction, compressible/ collapsible soils, and paleontological resources to a less than significant level.

Mitigation Measure GEO-1 **Implementation of Geotechnical Evaluation Recommendations.** The Applicant's construction contractor shall implement the recommendations of the Geotechnical Evaluation prepared for the proposed project, as applicable, to the satisfaction of the City of Cypress' (City) Building Official, or designee. The City's Building Official, or designee, shall confirm recommendations have been implemented into the design and construction of the proposed project prior to the issuance of a building permit.

Mitigation Measure GEO-2 **Procedures for Unexpected Paleontological Resources Discoveries.** In the event that paleontological resources are encountered, work in the immediate area of the

discovery shall be halted and the Applicant shall retain a professional paleontologist who meets the qualifications established by the Society of Vertebrate Paleontology to assess the discovery. The qualified, professional paleontologist shall make recommendations regarding the treatment and disposition of the discovered resources, as well as the need for subsequent paleontological mitigation, which may include, but not be limited to, paleontological monitoring, collection of observed resources, preservation, stabilization and identification of collected resources, curation of resources into a museum repository, and preparation of a monitoring report of findings, consistent with well accepted standards, such as those established by the Society of Vertebrate Paleontology. The City of Cypress shall ensure that the recommendations from the qualified, professional paleontologist shall be followed by the Applicant

4.4.9 Level of Significance after Mitigation

With implementation of **Regulatory Compliance Measure GEO-1** and **Mitigation Measures GEO-1 and GEO-2**, all identified potentially significant impacts related to geotechnical hazards and paleontological resources would be reduced below a level of significance.

4.4.10 Cumulative Impacts

Typically, geology and soils impacts are specific to a particular project site and there is little, if any, cumulative relationship between the development of a proposed project and development within a larger cumulative area. Moreover, while seismic conditions are regional in nature, seismic impacts on a given project site are site-specific. For example, development within the project site would not alter geologic events or soil features/characteristics (such as ground shaking, seismic intensity, or soil expansion or compression). Therefore, the proposed project would not affect the level of intensity at which a seismic event on an adjacent site is experienced.

While seismic events may affect a broad region, development of the cumulative projects would not increase the intensity, frequency, or duration of seismic events or the properties of off-site geology or soils. The CBC (adopted by reference in Chapter 15.08 [Construction Codes] of the City's Municipal Code) contains provisions to safeguard against major structural failures or loss of life caused by earthquakes, liquefaction, ground shaking, landslides, and other seismically induced hazards, as codified in **Regulatory Compliance Measure GEO-1**. In addition, the Geotechnical Evaluation recommendations would reduce potential impacts related to seismic ground shaking, liquefaction, compressible/collapsible soils as required by **Mitigation Measure GEO-1.** Cumulative development projects would be required to undergo environmental review pursuant to CEQA including, as necessary, site-specific investigation of potential geologic, seismic, or soil-related impacts. It is reasonable to expect that such site-specific investigation would appropriately identify the siting, design, and construction criteria established in the CBC and/or by the City to address site-

specific geologic/soil conditions affecting future development, and that the City would condition future development to fully satisfy said criteria. Therefore, cumulative geologic, seismic, or soil-related impacts would be rendered to a less than significant level, and the project's contribution to such impacts would not be cumulatively considerable.

It is not anticipated that their development would have any geotechnical impact on the project site or the buildings that would be constructed as part of the proposed project, nor would the project have geotechnical impacts on any of the 11 related projects identified in **Table 4.A, Summary of Related Projects,** in Chapter 4.0, Existing Setting. Therefore, the proposed project and the applicable related projects would not have the potential to cause cumulatively significant adverse impacts related to geology and soils.

Potential impacts of the proposed project to unknown paleontological resources and unique geologic features, when combined with the impacts of past, present, and reasonably foreseeable probable future projects in the City of Cypress, could contribute to a cumulatively significant impact due to the overall loss of paleontological remains unique to the region. However, each development proposal received by the City is required to undergo environmental review pursuant to CEQA. If there were any potential for significant impacts to paleontological resources or unique geologic features, an investigation would be required to determine the nature and extent of the resources and identify appropriate mitigation measures.

When resources are assessed and/or protected as they are discovered, impacts to these resources are less than significant. As such, implementation of **Mitigation Measure GEO-2** would ensure that the proposed project, together with cumulative projects, would not result in significant cumulative impacts to unique paleontological resources or unique geologic features.

4.5 GREENHOUSE GAS EMISSIONS

This section provides a discussion of global climate change (GCC), existing regulations pertaining to GCC, and an analysis of greenhouse gas (GHG) emissions associated with the 5665 Plaza Drive Project (proposed project). This analysis used the CalEEMod version 2022.1. to quantify the potential GHG emissions associated with both construction and operation of the proposed project. The CalEEMod output is contained in **Appendix C** of this Draft EIR.

4.5.1 Scoping Process

The City received 2 comment letters during the public review period for the NOP. For copies of the NOP comment letters, refer to **Appendix A** of this Draft EIR. Two comment letters included comments related to GHG emissions.

The letter from Los Alamitos received on June 5, 2024, suggest that the Draft EIR should evaluate the proposed project's impact greenhouse gas emission increases from the proposed land use changes.

The Letter from Warland Investments Company and Affiliated Entities received on June 5, 2024, attached a previous letter dated March 7, 2024, stating their concerns related to the failure to meet "Less than Significant" emissions by exceeding the 3,000 MT CO2e per year SCAQMD threshold and the failure to evaluate the effects of off-site GHG emissions.

4.5.2 Regulatory Setting

4.5.2.1 Federal Regulations

Clean Air Act (CAA)(42 U.S.C. §§ 7401-7671q). The United States has historically had a voluntary approach to reducing GHG emissions. However, on April 2, 2007, the United States Supreme Court ruled that the USEPA has the authority to regulate CO_2 emissions under the Clean Air Act. While there currently are no adopted federal regulations for the control or reduction of GHG emissions, the USEPA commenced several actions in 2009 to implement a regulatory approach to global climate change.

This includes the 2009 USEPA final rule for mandatory reporting of GHGs from large GHG emission sources in the United States. Additionally, the USEPA Administrator signed an endangerment finding action in 2009 under the Clean Air Act, finding that six GHGs (CO_2, methane (CH_4), nitrous oxide (N_2O), hydroflourocarbons (HFCs), perfluourocarbons (PFCs), sulfur hexafluoride (SF_6) constitute a threat to public health and welfare, and that the combined emissions from motor vehicles cause and contribute to global climate change, leading to national GHG emission standards.

Federal Vehicle Emissions Standards. In October 2012, the USEPA and the NHTSA, on behalf of the United States Department of Transportation, issued final rules to further reduce GHG emissions and improve CAFE standards for light-duty vehicles for model years 2017 and beyond (77 Fed. Reg. 62624 [October 15, 2012). The NHTSA's CAFE standards have been enacted under the Energy Policy and Conservation Act since 1978. This national program requires automobile manufacturers to build a single light-duty national fleet that meets all requirements under both federal programs and the standards of California and other states. This program would increase fuel economy to the equivalent of 54.5 miles per gallon, limiting vehicle emissions to 163 grams of CO_2 per mile for the

fleet of cars and light-duty trucks by model year 2025 (77 Fed. Reg. 62624, 62630 [October 15, 2012]).

On March 31, 2022, the NHTSA finalized the CAFE standards for Model Years 2024–2026 Passenger Cars and Light Trucks. The amended CAFE standards would require an industry-wide fleet average of approximately 49 mpg for passenger cars and light trucks in model year 2026, by increasing fuel efficiency by 8 percent annually for model years 2024–2025, and 10 percent annually for model year 2026. The final standards are estimated to save about 234 billion gallons of gas between model years 2030 to 2050.

4.5.2.2 State Regulations

Assembly Bill 1493 (AB 1493)(2002). In a response to the transportation sector's significant contribution to California's CO2 emissions, AB 1493 was enacted on July 22, 2002. AB 1493 required the CARB to set GHG emission standards for passenger vehicles and light duty trucks (and other vehicles whose primary use is noncommercial personal transportation in the State) manufactured in 2009 and all subsequent model years. These standards (starting in model years 2009 to 2016) were approved by the CARB in 2004, but the needed waiver of California Clean Air Act Preemption was not granted by the USEPA until June 30, 2009. The CARB responded by amending its original regulation, now referred to as Low Emission Vehicle III, to take effect for model years starting in 2017 to 2025. The Trump administration revoked California's preemption waiver in 2019; however, the Biden administration restored it in 2021.

Executive Order S-3-05 (2005). Governor Arnold Schwarzenegger signed Executive Order (EO) S-3-05 on June 1, 2005, which proclaimed that California is vulnerable to the impacts of climate change. To combat those concerns, the executive order established California's GHG emissions reduction targets, which established the following goals:

- GHG emissions should be reduced to 2000 levels by 2010.
- GHG emissions should be reduced to 1990 levels by 2020.
- GHG emissions should be reduced to 80 percent below 1990 levels by 2050.

The Secretary of the California Environmental Protection Agency is required to coordinate efforts of various State agencies to collectively and efficiently reduce GHGs. A biannual progress report must be submitted to the Governor and the State Legislature disclosing the progress made toward GHG emission reduction targets. In addition, another biannual report must be submitted illustrating the impacts of global warming on California's water supply, public health, agriculture, the coastline, and forestry, and report possible mitigation and adaptation plans to address these impacts.

The Secretary of the California Environmental Protection Agency leads this Climate Action Team (CAT) made up of representatives from State agencies as well as numerous other boards and departments. The CAT members work to coordinate statewide efforts to implement global warming emission reduction programs and the State's Climate Adaptation Strategy. The CAT is also responsible for reporting on the progress made toward meeting the statewide GHG targets that were established in the executive order and further defined under AB 32, the "Global Warming Solutions Act of 2006." The first CAT Report to the Governor and the State Legislature, which was released in March 2006, laid out 46 specific emission-reduction strategies for reducing GHG

emissions and reaching the targets established in the executive order. The most recent report was released in December 2020.

Assembly Bill 32 (AB 32) (2006), California Global Warming Solutions Act. California's major initiative for reducing GHG emissions is AB 32, passed by the State Legislature on August 31, 2006. This legislation aimed at reducing GHG emissions to 1990 levels by 2020. The CARB has established the level of GHG emissions in 1990 at 427 million metric tons (MMT) of CO_2e. The emissions target of 427 MMT requires the reduction of 169 MMT from the State's projected business-as-usual 2020 emissions of 596 MMT. AB 32 required the CARB to prepare a Scoping Plan outlining the main State strategies for meeting the 2020 deadline and reducing GHGs that contribute to global climate change. The Scoping Plan was approved by the CARB on December 11, 2008, and contains the main strategies California will implement to achieve the reduction of approximately 169 MMT CO_2e, or approximately 30 percent, from the State's projected 2020 emissions level of 596 MMT CO_2e under a business-as-usual scenario (this was a reduction of 42 MMT CO_2e, or almost 10 percent from 2002–2004 average emissions). The Scoping Plan also includes CARB-recommended GHG reductions for each emissions sector of the State's GHG inventory. The Scoping Plan calls for the largest reductions in GHG emissions to be achieved by implementing the following measures and standards:

- Improved emissions standards for light-duty vehicles (estimated reductions of 31.7 MMT CO_2e)
- The Low-Carbon Fuel Standard (15.0 MMT CO_2e)
- Energy efficiency measures in buildings and appliances and the widespread development of combined heat and power systems (26.3 MMT CO_2e)
- A renewable portfolio standard for electricity production (21.3 MMT CO_2e)

The Scoping Plan identifies 18 emission-reduction measures that address cap-and-trade programs, vehicle gas standards, energy efficiency, low carbon fuel standards, renewable energy, regional transportation-related GHG targets, vehicle efficiency measures, goods movement, solar roof programs, industrial emissions, high-speed rail, green building strategies, recycling, sustainable forests, water, and air. The measures were estimated to result in a total reduction of 174 MMT CO_2e by 2020.

On August 24, 2011, the CARB unanimously approved both the new supplemental assessment and reapproved its Scoping Plan, which provides the overall roadmap and rule measures to carry out AB 32. The CARB also approved a more robust CEQA equivalent document supporting the supplemental analysis of the cap-and-trade program. The cap-and-trade program took effect on January 1, 2012, with an enforceable compliance obligation that began January 1, 2013.

The CARB approved the First Update to the Climate Change Scoping Plan on May 22, 2014. The First Update identifies opportunities to leverage existing and new funds to further drive GHG emission reductions through strategic planning and targeted low carbon investments. The First Update defined CARB climate change priorities until 2020, and also set the groundwork to reach long-term goals set forth in EOs S-3-05 and B-16-2012. In addition, the First Update highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals as defined in the

initial Scoping Plan. It also evaluated how to align the State's "longer-term" GHG reduction strategies with other State policy priorities for water, waste, natural resources, clean energy, transportation, and land use. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan,[53] to reflect the 2030 target set by EO B-30-15 and codified by Senate Bill (SB) 32.

The 2022 Scoping Plan[54] was approved in December 2022. It assesses progress towards achieving the SB 32 2030 target and lays out a path to achieve carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

Senate Bill 97 (SB 97) (2007). SB 97, signed by Governor Schwarzenegger in August 2007 (Chapter 185, Statutes of 2007; Public Resources Code, Sections 21083.05 and 21097), acknowledges climate change is a prominent environmental issue that requires analysis under the California Environmental Quality Act (CEQA). This bill directed the Governor's Office of Planning and Research to prepare, develop, and transmit to the California Resources Agency guidelines for mitigating GHG emissions or the effects of GHG emissions, as required by CEQA.

The California Natural Resources Agency adopted the amendments to the State CEQA Guidelines in November 2018, which went into effect in December 2018. The amendments do not identify a threshold of significance for GHG emissions, nor do they prescribe assessment methodologies or specific mitigation measures. The amendments encourage lead agencies to consider many factors in performing a CEQA analysis, but preserve the discretion granted by CEQA to lead agencies in making their own determinations based on substantial evidence. The amendments also encourage public agencies to make use of programmatic mitigation plans and programs when they perform individual project analyses.

Senate Bill 375 (SB 375) (2008). SB 375, the Sustainable Communities and Climate Protection Act, which establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions, was adopted by the State on September 30, 2008. On September 23, 2010, the CARB adopted the vehicular GHG emissions reduction targets that had been developed in consultation with the Metropolitan Planning Organization (MPO); the targets required a 6 to 15 percent reduction by 2020 and between 13 to 19 percent reduction by 2035 for each MPO. SB 375 recognizes the importance of achieving significant GHG reductions by working with cities and counties to change land use patterns and improve transportation alternatives. Through the SB 375 process, MPOs such as the Southern California Association of Governments (SCAG) will work with local jurisdictions in the development of a Sustainable Communities Strategy (SCS) designed to integrate development patterns and the transportation network in a way that reduces GHG emissions while meeting housing needs and other regional planning objectives. Pursuant to SB 375,

53 CARB. 2017. *California's 2017 Climate Change Scoping Plan*. November.

54 CARB. 2021. *2022 Scoping Plan Update*. May 10. Website: https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf (accessed June 2024).

the Los Angeles/Southern California reduction targets for per capita vehicular emissions were 8 percent by 2020 and are 19 percent by 2035, as shown in **Table 4.5.1**.

Table 4.5.1: Senate Bill 375 Regional Greenhouse Gas Emissions Reduction Targets

Metropolitan Planning Organization	By 2020 (percentage)	By 2035 (percentage)
San Francisco Bay Area	10	19
San Diego	15	19
Sacramento	7	19
Central Valley/San Joaquin	6–13	13–16
Los Angeles/Southern California	8	19

Source: California Air Resources Board (2018).

Executive Order B-30-15 (EO B-30-15) (2015). Governor Jerry Brown signed EO B-30-15 on April 29, 2015, which added the immediate target of:

- GHG emissions should be reduced to 40 percent below 1990 levels by 2030.

All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB was directed to update the AB 32 Scoping Plan to reflect the 2030 target. The mid-term target is critical to help frame the suite of policy measures, regulations, planning efforts, and investments in clean technologies and infrastructure needed to continue reducing emissions.

Senate Bill 350 (SB 350) (2015) Clean Energy and Pollution Reduction Act. SB 350, signed by Governor Brown on October 7, 2015, updates and enhances AB 32 by introducing the following set of objectives in clean energy, clean air, and pollution reduction for 2030:

- Raise California's renewable portfolio standard from 33 percent to 50 percent; and
- Increasing energy efficiency in buildings by 50 percent by the year 2030.

The 50 percent renewable energy standard will be implemented by the California Public Utilities Commission for the private utilities and by the California Energy Commission for municipal utilities. Each utility must submit a procurement plan showing it will purchase clean energy to displace other non-renewable resources. The 50 percent increase in energy efficiency in buildings must be achieved through the use of existing energy efficiency retrofit funding and regulatory tools already available to State energy agencies under existing law. The addition made by this legislation requires State energy agencies to plan for, and implement those programs in a manner that achieves the energy efficiency target.

Senate Bill 32 (SB 32), California Global Warming Solutions Act of 2016, and Assembly Bill 197 (AB 197). In summer 2016, the State Legislature passed, and the Governor signed, SB 32 and AB 197. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in Governor Brown's April 2015 EO B-30-15. SB 32 builds on AB 32 and keeps the State on the path toward

achieving its 2050 objective of reducing emissions to 80 percent below 1990 levels, consistent with an Intergovernmental Panel on Climate Change analysis of the emissions trajectory that would stabilize atmospheric GHG concentrations at 450 parts per million CO_2e and reduce the likelihood of catastrophic impacts from climate change.

The companion bill to SB 32, AB 197, provides additional direction to CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 meant to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

Senate Bill 100 (SB 100). On September 10, 2018, Governor Brown signed SB 100, which raises California's Renewables Portfolio Standard requirements to 60 percent by 2030, with interim targets, and 100 percent by 2045. The bill also establishes a State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the Western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Executive Order B-55-18 (EO B-55-18). EO B-55-18, signed September 10, 2018, set a goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." EO B-55-18 directs CARB to work with relevant State agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO_2e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

California Building Standards Code and CALGreen Code (Cal. Code Regs. Tit. 24, pt. 11). In November 2008, the California Building Standards Commission established the California Green Building Standards Code (CALGreen Code), which sets performance standards for residential and non-residential development to reduce environmental impacts and encourage sustainable construction practices. The CALGreen Code addresses energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The CALGreen Code is updated every 3 years and was most recently updated in 2022 to include new mandatory measures for residential as well as non-residential uses; the new measures took effect on January 1, 2023.

California Building Efficiency Standards (Cal. Code Regs. Tit. 24, pt. 6). The California Building Standards Code, or Title 24 of the California Code of Regulations contains the regulations that govern the construction of buildings in California. Within the Building Standards Code, two parts pertain to the incorporation of both energy efficient and green building elements into land use development. Part 6 is California's Energy Efficiency Standards for Residential and Non-Residential Buildings. These standards were first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption and are updated on an approximately 3-year cycle to allow consideration and possible incorporation of new energy efficient technologies and methods. All buildings for which an application for a building permit is submitted on or after January 1, 2023,

must follow the 2022 standards. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions.

Cap and Trade. The development of a cap-and-trade program was included as a key reduction measure of the CARB AB 32 Climate Change Scoping Plan. The cap-and-trade program will help put California on the path to meet its goal of achieving an 80 percent reduction of GHG emissions from 1990 levels by 2050. The cap-and-trade emissions trading program developed by the CARB took effect on January 1, 2012, with enforceable compliance obligations beginning January 1, 2013. The cap-and-trade program aims to regulate GHG emissions from the largest producers in the State by setting a statewide firm limit, or cap, on allowable annual GHG emissions. The cap was set in 2013 at approximately 2 percent below the emissions forecast for 2020. In 2014, the cap declined approximately 2 percent. Beginning in 2015 and continuing through 2020, the cap has been declining approximately 3 percent annually. The CARB administered the first auction on November 14, 2012, with many of the qualified bidders representing corporations or organizations that produce large amounts of GHG emissions, including energy companies, agriculture and food industries, steel mills, cement companies, and universities. On January 1, 2015, compliance obligation began for distributors of transportation fuels, natural gas, and other fuels. The cap-and-trade program was initially slated to sunset in 2020, but the passage of SB 398 in 2017 extended the program through 2030.

Executive Order N-79-20 (EO N-79-20). EO N-79-20, which was signed by Governor Gavin Newsom on September 23, 2020, sets the following goals for the State: 100 percent of in-State sales of new passenger cars and trucks shall be zero-emission by 2035; 100 percent of medium- and heavy-duty vehicles in the State shall be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks; and 100 percent of off-road vehicles and equipment in the State shall be zero-emission by 2035, where feasible.

Assembly Bill 1279. AB 1279 was signed in September of 2022, and codifies the State's goals of achieving net carbon neutrality by 2045 and maintaining net negative GHG emissions thereafter. This bill also requires California to reduce statewide GHG emissions by 85 percent compared to 1990 levels by 2045 and directs CARB to work with relevant state agencies to achieve these goals.

California Integrated Waste Management Act of 1989 (AB 939). To minimize the amount of solid waste that must be disposed of in landfills, the State Legislature passed the California Integrated Waste Management Act of 1989 (AB 939), effective January 1990. According to AB 939, all cities and counties were required to divert 25 percent of all solid waste from landfill facilities by January 1, 1995, and 50 percent by January 1, 2000. Through other statutes and regulations, this 50 percent diversion rate also applies to State agencies. In order of priority, waste reduction efforts must promote source reduction, recycling and composting, and environmentally safe transformation and land disposal. In 2011, AB 341 modified the California Integrated Waste Management Act and directed the CalRecycle to develop and adopt regulations for mandatory commercial recycling. AB 341 also established a statewide recycling goal of 75 percent; the 50 percent disposal reduction mandate still applies for cities and counties under AB 939, the Integrated Waste Management Act. In April 2016, AB 1826 further modified the California Integrated Waste Management Act, requiring businesses that generate a specified amount of organic waste per week to arrange for recycling services for that organic waste in a specified manner. Diverting organic waste from landfills reduces

emissions of CH_4. This is equivalent to reducing anaerobic decomposition of organic waste that would have otherwise occurred in landfills where organic waste is often buried with other inorganic waste.

Low Carbon Fuel Standard. In January 2007, EO S-01-07 established a low carbon fuel standard (LCFS). This executive order calls for a statewide goal to be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020, and that an LCFS for transportation fuels be established for California. The LCFS applies to all refiners, blenders, producers, or importers ("Providers") of transportation fuels in California, including fuels used by off-road construction equipment. In June 2007, CARB adopted the LCFS under AB 32 pursuant to Health and Safety Code Section 38560.5, and, in April 2009, CARB approved the new rules and carbon intensity reference values with new regulatory requirements taking effect in January 2011. The standards require providers of transportation fuels to report on the mix of fuels they provide and demonstrate they meet the LCFS intensity standards annually. This is accomplished by ensuring that the number of "credits" earned by providing fuels with a lower carbon intensity than the established baseline (or obtained from another party) is equal to or greater than the "deficits" earned from selling higher-intensity fuels. In response to certain court rulings, CARB re-adopted the LCFS regulation in September 2015, and the LCFS went into effect on January 1, 2016. In 2018, CARB approved amendments to the regulation to readjust carbon intensity benchmarks to meet California's 2030 GHG reductions targets under SB 32. These amendments include opportunities to promote zero-emission vehicle (ZEV) adoption, carbon capture and sequestration, and advanced technologies for decarbonization of the transportation sector.

Advanced Clean Cars Program. In January 2012, CARB approved the Advanced Clean Cars program, which combines the control of GHG emissions and criteria air pollutants, as well as requirements for greater numbers of ZEVs, into a single package of regulatory standards for vehicle model years 2017 through 2025. The new regulations strengthen the GHG standard for 2017 models and beyond. This will be achieved through existing technologies, the use of stronger and lighter materials, and more efficient drivetrains and engines. The program's ZEVs regulation requires battery, fuel cell, and/or plug-in hybrid electric vehicles to account for up to 15 percent of California's new vehicle sales by 2025. The program also includes a clean fuel outlet regulation designed to support the commercialization of zero-emission hydrogen fuel cell vehicles planned by vehicle manufacturers by 2015 by requiring increased numbers of hydrogen fueling stations throughout the State. The number of stations will grow as vehicle manufacturers sell more fuel cell vehicles. By 2025, when the rules will be fully implemented, the statewide fleet of new cars and light trucks will emit 40 percent fewer GHGs and 75 percent fewer smog-forming emissions than 2012 model year vehicles.

Executive Order B-48-18 (EO B-48-18). In January 2018, Governor Brown signed EO B-48-18 requiring all State entities to work with the private sector to have at least 5 million ZEVs on the road by 2030, as well as install 200 hydrogen fueling stations and 250,000 electric vehicle charging stations by 2025. It specifies that 10,000 of the electric vehicle charging stations should be direct current fast chargers. This order also requires all State entities to continue to partner with local and regional governments to streamline the installation of ZEV infrastructure. The Governor's Office of Business and Economic Development is required to publish a Plug-in Charging Station Design Guidebook and update the 2015 Hydrogen Station Permitting Guidebook to aid in these efforts. All State entities are required to participate in updating the 2016 Zero-Emissions Vehicle Action Plan to

help expand private investment in ZEV infrastructure with a focus on serving low-income and disadvantaged communities. Additionally, all State entities are to support and recommend policies and actions to expand ZEV infrastructure at residential land uses, through the LCFS Program, and recommend how to ensure affordability and accessibility for all drivers.

4.5.2.3 Regional Regulations

South Coast Air Quality Management District. SCAQMD is the responsible for air quality regulation in the South Coast Air Basin. In 2008, the SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the Basin. The Working Group developed several different options that are contained in the SCAQMD 2008 draft guidance document titled Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans[55] that could be applied by lead agencies. On September 28, 2010, SCAQMD Working Group Meeting No. 15 provided further guidance, including a tiered approach for evaluating GHG emissions for development projects where the SCAQMD is not the lead agency. The SCAQMD has not presented a finalized version of these thresholds to the governing board.

The SCAQMD identifies the emissions level for which a project would not be expected to substantially conflict with any State legislation adopted to reduce statewide GHG emissions. As such, the utilization of a service population represents the rates of emissions needed to achieve a fair share of the State's mandated emissions reductions. Overall, the SCAQMD identifies a GHG efficiency level that, when applied statewide or to a defined geographic area, would meet the 2020 and post-2020 emissions targets as required by AB 32 and SB 32. If projects are able to achieve targeted rates of emissions per the service population, the State will be able to accommodate expected population growth and achieve economic development objectives, while also abiding by AB 32's emissions target and future post-2020 targets.

Southern California Association of Governments. On April 4, 2024, SCAG adopted Connect SoCal—the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (2024–2050 RTP/SCS) for the SCAG region.[56] In general, the SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce vehicle miles traveled from automobiles and light-duty trucks and thereby reduce GHG emissions from these sources. For the SCAG region, CARB has set GHG reduction targets at 19 percent below 2005 per capita emissions levels by 2035. The RTP/SCS lays out a strategy for the region to meet these targets. Overall, the SCS is meant to provide growth strategies that will achieve the regional GHG emissions reduction targets. Land use strategies to achieve the region's targets include planning for new growth around high-quality transit areas and livable corridors, and creating neighborhood mobility areas to integrate land use and transportation and plan for more

55 SCAQMD. 2008b. *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans.*

56 Southern California Association of Governments (SCAG). 2024. Connect SoCal: The 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. Website: https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547(accessed May 13, 2024).

active lifestyles.[57] However, the SCS does not require that local General Plans, Specific Plans, or zoning be consistent with the SCS; SCAG is required to consider local land use controls when drafting the SCS.

4.5.2.4 Local Regulations

The City of Cypress does not currently have an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

4.5.3 Existing Environmental Setting

Global climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans in recent decades. The Earth's average near-surface atmospheric temperature rose 0.6 ± 0.2° Celsius or 1.1 ± 0.4° Fahrenheit in the 20th century. The prevailing scientific opinion on climate change is that most of the warming observed over the last 50 years is attributable to human activities. The increased amounts of CO_2 and other GHGs are the primary causes of the human-induced component of warming. GHGs are released by the burning of fossil fuels, land clearing, agriculture, and other activities, and lead to an increase in the greenhouse effect.[58]

GHGs are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced global climate change are:

- CO_2
- CH_4
- N_2O
- HFCs
- PFCs
- SF_6

Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere, and enhancing the natural greenhouse effect, which is believed to be causing global warming. While manmade GHGs include naturally occurring GHGs such as CO_2, methane, and N_2O, some gases, like HFCs, PFCs, and SF_6 are completely new to the atmosphere.

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57 Southern California Association of Governments (SCAG). 2024. Connect SoCal: The 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. Website: https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547(accessed May 13, 2024).

58 The temperature on Earth is regulated by a system commonly known as the "greenhouse effect." Just as the glass in a greenhouse lets heat from sunlight in and reduces the heat escaping, greenhouse gases like carbon dioxide, methane, and nitrous oxide in the atmosphere keep the Earth at a relatively even temperature. Without the greenhouse effect, the Earth would be a frozen globe; thus, although an excess of greenhouse gas results in global warming, the naturally occurring greenhouse effect is necessary to keep our planet at a comfortable temperature.

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation. For the purposes of this air quality analysis, the term "GHGs" will refer collectively to the six gases listed above.

These gases vary considerably in terms of Global Warming Potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The global warming potential is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time that the gas remains in the atmosphere ("atmospheric lifetime"). The GWP of each gas is measured relative to CO_2, the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO_2 over a specified time period. GHG emissions are typically measured in terms of pounds or tons of "CO_2 equivalents" (CO_2e). **Table 4.5.2** shows the GWP for each type of GHG. For example, SF_6 is 23,900 times more potent at contributing to global warming than CO_2.

Table 4.5.2: Global Warming Potential of Greenhouse Gases

Gas	Atmospheric Lifetime (Years)	Global Warming Potential (100-Year Time Horizon)
Carbon Dioxide	50-200	1
Methane	12	25
Nitrous Oxide	114	310
HFC-23	270	11,700
HFC-134a	14	140
HFC-152a	1.4	140
PFC: Tetrafluoromethane (CF_4)	50,000	6,500
PFC: Hexafluoromethane (C_2F_6)	10,000	9,200
Sulfur Hexafluoride (SF_6)	3,200	23,900

Source: *Second Update to the Climate Change Scoping Plan: Building on the Framework* (CARB 2017a).
HFC = hydrofluorocarbons
PFC = perfluorocarbons

The following discussion summarizes the characteristics of the six GHGs and black carbon

4.5.3.1 Carbon Dioxide

In the atmosphere, carbon generally exists in its oxidized form, as CO_2. Natural sources of CO_2 include the respiration (breathing) of humans, animals and plants, volcanic outgassing, decomposition of organic matter and evaporation from the oceans. Human-caused sources of CO_2 include the combustion of fossil fuels and wood, waste incineration, mineral production, and deforestation. Natural sources release approximately 150 billion tons of CO_2 each year, far outweighing the 7 billion tons of man-made emissions of CO_2 each year. Nevertheless, natural removal processes, such as photosynthesis by land- and ocean-dwelling plant species, cannot keep pace with this extra input of man-made CO_2; consequently, the gas is building up in the atmosphere.

In 2021, total annual CO_2 accounted for 81.2 percent of California's overall GHG emissions.[59] Transportation is the single largest source of CO_2 in California, which is primarily composed of on-road travel. Electricity production and industrial and residential sources also make important contributions to CO_2 emissions in California.

4.5.3.2 Methane

CH_4 is produced when organic matter decomposes in environments lacking sufficient oxygen. Natural sources include wetlands, termites, and oceans. Decomposition occurring in landfills accounts for the majority of human-generated CH_4 emissions in California and in the United States as a whole. Agricultural processes such as intestinal fermentation, manure management, and rice cultivation are also significant sources of CH_4 in California. Total annual emissions of CH_4 accounted for 9.8 percent of GHG emissions in California in 2021.[60]

4.5.3.3 Nitrous Oxide

N_2O is produced naturally by a wide variety of biological sources, particularly microbial action in soils and water. Tropical soils and oceans account for the majority of natural source emissions. Nitrous oxide is a product of the reaction that occurs between nitrogen and oxygen during fuel combustion. Both mobile and stationary combustion emit N_2O, and the quantity emitted varies according to the type of fuel, technology, and pollution control device used, as well as maintenance and operating practices. Agricultural soil management and fossil fuel combustion are the primary sources of human-generated N_2O emissions in California. Nitrous oxide emissions accounted for 3.5 percent of GHG emissions in California in 2021.[61]

4.5.3.4 Hydrofluorocarbons, Perfluorocarbons, and Sulfur Hexafluoride

HFCs are primarily used as substitutes for ozone-depleting substances regulated under the Montreal Protocol.[62] PFCs and SF_6 are emitted from various industrial processes, including aluminum smelting, semiconductor manufacturing, electric power transmission and distribution, and magnesium casting. There is no aluminum or magnesium production in California; however, the rapid growth in

[59] California Air Resources Board (CARB). 2022b. GHGs Descriptions and Sources in California. Website: ww2.arb.ca.gov/ghg-descriptions-sources (accessed May 13, 2024).

[60] United States Environmental Protection Agency (USEPA). 2023. Inventory of U.S. Greenhouse Gas Emissions and Sinks. Website: https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks#:~:text=In%202021%2C%20U.S.%20greenhouse%20gas,sequestration%20from%20the%20land%20sector (accessed May 13, 2024).

[61] United States Environmental Protection Agency (USEPA). 2023. Inventory of U.S. Greenhouse Gas Emissions and Sinks. Website: https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks#:~:text=In%202021%2C%20U.S.%20greenhouse%20gas,sequestration%20from%20the%20land%20sector (accessed May 13, 2024).

[62] The Montreal Protocol is an international treaty that was approved on January 1, 1989, and was designated to protect the ozone layer by phasing out the production of several groups of halogenated hydrocarbons believed to be responsible for ozone depletion.

the semiconductor industry leads to greater use of PFCs. HFCs, PFCs, and SF_6 accounted for about 5.6 percent of GHG emissions in California in 2021.[63]

4.5.4 Emissions Sources and Inventories

4.5.4.1 Global Emissions

Worldwide emissions of GHGs in 2020 totaled 22.9 billion MT of CO_2e. Global estimates are based on country inventories developed as part of the programs of the United Nations Framework Convention on Climate Change.[64]

4.5.4.2 United States Emissions

In 2022, the year for which the most recent data are available, the United States emitted about 6,343 million metric tons of CO_2e (MMT CO_2e). Overall, emissions in 2022 increased by 1 percent relative to the 2021 total GHG emissions. This increase in total GHG emissions was driven by fossil fuel combustion due primarily to increased energy use, due inpart to the continued rebound in economic activity after the height of the COVID-19 pandemic. However, GHG emissions in 2022 were 17 percent below those of 2005 levels. Of the five major sectors—residential and commercial, agricultural, industry, transportation, and electricity generation—transportation accounted for the highest amount of GHG emissions in 2022 (approximately 28 percent), with electricity generation second at 25 percent and emissions from industry third at 23 percent.[65]

4.5.4.3 State of California Emissions

The State emitted 381.3 MMT CO_2e emissions in 2021, 12.6 MMT CO_2e higher than 2020 levels but 23.1 MMT CO_2e below the 2019 levels.[66] CARB estimates that transportation was the source of 38 percent of the State's GHG emissions in 2021, which is a 7.4 percent higher than the 2020 emissions. This increase was most likely from passenger vehicles whose activity and emissions rebounded after the COVID-19 pandemic. The next largest sources included industrial sources at approximately 19 percent and electricity generation at 16 percent. The remaining sources of GHG emissions were commercial and residential activities at 10 percent, agriculture at 8 percent, high GWP at 6 percent, and waste at 2 percent.[67]

4.5.5 Methodology

The proposed project would result in GHG emissions from construction and operational sources. Construction activities associated with the proposed project would produce combustion emissions

63 CARB. 2021. *2022 Scoping Plan Update*. May 10. Website: https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf (accessed June 2024).

64 United Nations Framework Convention on Climate Change. 2022. GHG Data from UNFCCC. Website: https://di.unfccc.int/time_series (accessed May 13, 2024).

65 USEPA. 2023. Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2022. Website: https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks (accessed May 13, 2024).

66 CARB. 2023. *California Greenhouse Gas Emissions for 2000 to 2021, Trends of Emissions and Other Indicators Report*. Website: https://ww2.arb.ca.gov/sites/default/files/2023-12/2000_2021_ghg_inventory_trends.pdf (accessed May 13, 2024).

67 Ibid.

from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. Operational activities would also generate emissions at the project site from area, mobile, stationary, waste, and water sources as well as indirect emissions from sources associated with energy consumption. This analysis used the CalEEMod version 2022.1. to quantify the potential GHG emissions associated with both construction and operation of the proposed project.

4.5.6 Thresholds of Significance

The thresholds for greenhouse gas emissions impacts used in this analysis are consistent with Appendix G of the State CEQA Guidelines and the City's Initial Study/Environmental Checklist. The proposed project may be deemed to have a significant impact with respect to GHG emissions if it would:

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

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

4.5.6.1 Regional Emissions Thresholds

To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, SCAQMD convened a GHG CEQA Significance Threshold Working Group (Working Group). Based on the last Working Group meeting held in September 2010 (Meeting No. 15), SCAQMD proposed to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency:

- **Tier 1. Exemptions:** If a project is exempt from CEQA, project-level and cumulative GHG emissions are less than significant.

- **Tier 2. Consistency with a locally adopted GHG Reduction Plan:** If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project's geographic area (i.e., city or county), project-level and cumulative GHG emissions are less than significant.

- **Tier 3. Numerical Screening Threshold:** If GHG emissions are less than the numerical screening-level threshold, project-level and cumulative GHG emissions are less than significant.

  For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, SCAQMD requires an assessment of GHG emissions. SCAQMD, under Option 1, is proposing a "bright-line" screening-level threshold of 3,000 metric tons of CO_2e per year (MT CO_2e/yr) for all land use types or, under Option 2, the following land-use-specific thresholds: 1,400 MT CO_2e for commercial projects, 3,500 MT CO_2e for residential projects, or 3,000 MT CO_2e for mixed-use projects. This bright-line threshold is based on a review of the Governor's Office of Planning and Research database of CEQA projects. Based on their review of 711 CEQA

projects, 90 percent of CEQA projects would exceed the bright-line thresholds identified above. Therefore, projects that do not exceed the bright-line threshold would have a nominal and therefore less than cumulatively considerable impact on GHG emissions.

- **Tier 4. Performance Standards:** If emissions exceed the numerical screening threshold, a more detailed review of the project's GHG emissions is warranted. SCAQMD has proposed an efficiency target for projects that exceed the bright-line threshold. The current recommended approach is per capita efficiency targets. SCAQMD is not recommending use of a percentage emissions reduction target. Instead, SCAQMD proposes a 2020 efficiency target of 4.8 MT CO_2e/yr per service population (MT CO_2e/yr/SP) for project-level analyses and 6.6 MT CO_2e/yr/SP for plan-level projects (e.g., program-level projects such as general plans). In addition, GHG reductions by the SB 375 target date of 2035 would be approximately 40 percent. This 40 percent reduction was applied to the 2020 targets, resulting in an efficiency threshold for plans of 4.1 MT CO_2e/yr/SP and an efficiency threshold at the project level of 3.0 MT CO_2e/yr/SP. The GHG efficiency metric divides annualized GHG emissions by the service population, which is the sum of residents and employees, per the following equation:

  Rate of Emission: GHG Emissions (MT CO_2e/yr) ÷ Service Population

  The efficiency evaluation consists of comparing the project's efficiency metric to efficiency targets. Efficiency targets represent the maximum quantity of emissions each resident and employee in the State of California could emit in various years based on emission levels necessary to achieve the statewide GHG emissions reduction goals. A project that results in a lower rate of emissions would be more efficient than a project with a higher rate of emissions, based on the same service population. The metric considers GHG reduction measures integrated into a project's design and operation (or through mitigation).

The 3,000 MT CO_2e/yr threshold is based on a 90 percent emission "capture" rate methodology. Prior to its use by the SCAQMD, the 90 percent emissions capture approach was one of the options suggested by the California Air Pollution Control Officers Association in its CEQA & Climate Change white paper.[68] A 90 percent emission capture rate means that unmitigated GHG emissions from the top 90 percent of all GHG-producing projects within a geographic area—the South Coast Air Basin (Basin) in this instance—would be subject to a detailed analysis of potential environmental impacts from GHG emissions, while the bottom 10 percent of all GHG-producing projects would be excluded from detailed analysis. A GHG significance threshold based on a 90 percent emission capture rate is appropriate to address the long-term adverse impacts associated with global climate change, because medium and large projects will be required to implement measures to reduce GHG emissions, while small projects, which are generally infill development projects that are not the focus of the State's GHG reduction targets, are allowed to proceed. Further, a 90 percent emission capture rate sets the emission threshold low enough to capture a substantial proportion of future development projects and demonstrate that cumulative emissions reductions are being achieved

[68] SCAQMD. 2008b. *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans*. December 5. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2 (accessed May 13, 2024).

while setting the emission threshold high enough to exclude small projects that will, in aggregate, contribute approximate 1 percent of projected statewide GHG emissions in the Year 2050.[69]

In setting the threshold at 3,000 MT CO_2e/yr, SCAQMD researched a database of projects kept by the Governor's Office of Planning and Research. That database contained 798 projects, 87 of which were removed because they were very large projects and/or outliers that would skew emissions values too high, leaving 711 as the sample population to use in determining the 90th percentile capture rate.[70] The SCAQMD analysis of the 711 projects within the sample population combined commercial, residential, and mixed-use projects. Emissions from each of these projects were calculated by SCAQMD to provide a consistent method of emissions calculations across the sample population and from projects within the sample population. In calculating the emissions, the SCAQMD analysis determined that the 90th percentile ranged between 2,983 to 3,143 MT CO_2e/yr.[71] The SCAQMD set its significance threshold at the low-end value of the range when rounded to the nearest hundred tons of emissions (i.e., 3,000 MT CO_2e/yr) to define small projects that are considered less than significant and do not need to provide further analysis.

The City understands that the 3,000 MT CO_2e/yr threshold for residential/commercial uses was proposed by SCAQMD a decade ago and was adopted as an interim policy; however, no permanent, superseding policy or threshold has since been adopted. The 3,000 MT CO_2e/yr threshold was developed and recommended by SCAQMD, an expert agency, based on substantial evidence as provided in the Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold[72] document and subsequent Working Group meetings (the latest of which took place in 2010). SCAQMD has not withdrawn its support of the interim threshold and all documentation supporting the interim threshold remains on the SCAQMD website on a page that provides guidance to CEQA practitioners for air quality analysis (and where all SCAQMD significance thresholds for regional and local criteria pollutants and toxic air contaminants also are listed). Further, as stated by SCAQMD, this threshold "uses the Executive Order S-3-05 goal [80 percent below 1990 levels by 2050] as the basis for deriving the screening level" and, thus, remains valid for use in 2023.[73] Lastly, this threshold has been used for hundreds, if not thousands, of GHG analyses performed for projects within the Basin. Although the threshold was never formally adopted by SCAQMD and is therefore not considered legally binding, it has been included in the discussion below in order to provide full disclosure and consistency with other CEQA documents produced by the City and other jurisdictions within the Basin. This inclusion complements the analysis of compliance with applicable air quality

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69 SCAQMD. 2008b. *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans*. December 5. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2 (accessed May 13, 2024).

70 SCAQMD. 2009. *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13*. August 26. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-13/ghg-meeting-13-minutes.pdf?sfvrsn=2 (accessed May 13, 2024).

71 Ibid.

72 SCAQMD. 2008a. *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*. October. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2 (accessed May 13, 2024).

73 Ibid.

documents, such as the 2022 Scoping Plan and the 2020–2045 RTP/SCS presented under Threshold GHG-2 below.

For the purpose of this analysis, the proposed project will first be compared to the SCAQMD screening-level Tier 3 Numerical Screening Threshold of 3,000 MT CO_2e/yr for all land use type projects. If it is determined that the proposed project is estimated to exceed this numerical threshold, it will then be compared to the SCAQMD-recommended 2035 efficiency-based threshold of 4.1 MT CO_2e/yr per service population for plan-level projects. As previously stated, the proposed project is also evaluated for compliance with the 2022.

4.5.7 Project Impacts

Threshold GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact GHG-1: Less Than Significant Impact. This section describes the potential construction- and operational-related GHG emissions associated with the proposed project. SCAQMD has not addressed emission thresholds for construction in its *CEQA Air Quality Handbook*; however, SCAQMD requires quantification and disclosure. Thus, this section discusses construction emissions.

Construction Greenhouse Emissions. Demolition and construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

The SCAQMD does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are required to quantify and disclose GHG emissions that would occur during construction. The SCAQMD suggests that construction GHG emissions be amortized over the life of the project (defined as 30 years), added to the operational emissions, and compared to the applicable interim GHG significance threshold tier.

Using the CalEEMod, it is estimated that the proposed project would generate a total of approximately 536.4 MT CO_2e during construction of the project. When annualized over the 30-year life of the project, annual emissions would be 17.9 MT CO_2e.

Operational Greenhouse House Gas Emissions. Long-term operation of the proposed project would generate GHG emissions from area, mobile, stationary, waste, and water sources as well as indirect emissions from sources associated with energy consumption. Mobile-source GHG emissions would include project-generated vehicle trips. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site, and other sources. Waste source emissions generated by the proposed project include energy generated by landfilling and other methods of disposal related to transporting and managing project-generated waste. In addition, water source emissions associated with the proposed project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment.

Long-term operation emissions associated with the proposed project were calculated using CalEEMod. The proposed project analysis was conducted using land use codes *Refrigerated Warehouse No-Rail* and *Parking Lot*. Trip generation rates used in CalEEMod for the proposed project were based on the project's trip generation estimates identified in the proposed project's Traffic Analysis.[74] The proposed project would generate a total of 406 average daily trips (ADT), including 262 passenger vehicle trips, 50 two-axle truck trips, 16 three-axle truck trips, and 78 four-axle truck trips, which were included in CalEEMod. This analysis assumes that the four+-axle truck trips would travel approximately 40 miles. To be conservative, separate CalEEMod analyses were prepared for the operational analysis for the proposed project. One CalEEMod run evaluated operational and vehicle trip emissions and another CalEEMod run evaluated four+-axle truck trip emissions. When project-specific data were not available, default assumptions from CalEEMod were used to estimate project emissions.

In addition, long-term operational emissions associated with the existing uses were evaluated in CalEEMod. The project site is developed with an existing 150,626-square-foot office building; however, a total of 61,616 square feet (41 percent) of space was occupied as of August 2022. It was conservatively assumed in the Traffic Analysis that only 37,657 (25 percent) of the building was occupied. Therefore, the existing uses analysis evaluates 37,657 square feet of existing office uses and the Traffic Analysis identifies an existing trip generation of 408 ADT associated with the 37,657-square-foot occupied space.

Table 4.5.3 shows the calculated GHG emissions for the proposed project. As shown in **Table 4.5.3**, mobile sources would be the largest source of GHG emissions for the proposed project at approximately 61 percent of the total project emissions. Energy sources would be the next largest category at approximately 33 percent. Water sources would be approximately 4 percent of the total emissions and waste sources would be approximately 2 percent of the total emissions. Area sources would be approximately less than 1 percent of the total emissions.

As discussed above, according to SCAQMD, a project would have less than significant GHG emissions if it would result in operational-related GHG emissions of less than 3,000 MT CO_2e/yr. Based on the analysis results, the proposed project would result in a net increase of 2,925.9 MT CO_2e/yr over existing conditions, which would be below the numeric threshold of 3,000 MT CO_2e. Therefore, operation of the proposed project would not generate significant GHG emissions that would have a significant effect on the environment. As such, impacts related to operational GHG emissions would be less than significant. No mitigation is required.

[74] Urban Crossroads. 2023. *Goodman Commerce Center Traffic Analysis*. November 21, 2023.

Table 4.5.3: GHG Emissions (MT/yr)

Emission Type	Operational Emissions				
	CO_2	CH_4	N_2O	CO_2e	Percentage of Total
Existing Uses GHG Emissions					
Mobile Sources	407.7	<0.1	<0.1	414.4	63
Area Sources	0.8	<0.1	<0.1	0.8	<1
Energy Sources	212.6	<0.1	<0.1	213.3	32
Water Source	13.1	0.2	<0.1	20.1	3
Waste Source	3.1	0.3	0.0	10.9	2
Total Existing Uses Emissions				659.5	-
Proposed Project GHG Emissions					
Mobile Sources	330.8	<0.1	<0.1	336.1	9
Mobile Sources – Heavy Heavy Duty Trucks	1,778.1	0.1	0.3	1,867.7	52
Area Sources	3.9	<0.1	<0.1	3.9	<1
Energy Sources	1,166.0	0.1	<0.1	1,170.1	33
Water Sources	87.0	1.4	<0.1	133.4	4
Waste Sources	16.1	1.6	0.0	56.2	2
Total Operational Emissions				**3,567.4**	**100**
Amortized Construction Emissions				**17.9**	**-**
Total Annual Emissions				**3,585.3**	**-**
Total Net Annual Emissions				**2,925.9**	
SCAQMD Threshold				**3,000**	**-**
Exceeds Threshold?				**No**	**-**

Source: LSA (June 2024).
GHG = greenhouse gas
MT/yr = metric tons per year
SCAQMD = South Coast Air Quality Management District

Threshold GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact GHG-2: Less Than Significant Impact. The City, as a lead agency, may assess the significance of GHG emissions by determining a project's consistency with a local GHG reduction plan that qualifies under Section 15183.5 of the State CEQA Guidelines. The City of Cypress has not adopted a GHG reduction plan. In addition, the City has not completed the GHG inventory, benchmarking, and goal-setting process required to identify a reduction target and to take advantage of the streamlining provisions contained in the State CEQA Guidelines amendments adopted in SB 97.

2022 Scoping Plan. EO B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan, to reflect the 2030 target set by EO B-30-15 and codified by Senate Bill (SB) 32. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. The companion bill to SB 32, AB 197, provides additional direction to the CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 intended to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

The 2022 Scoping Plan Update[75] assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan Update focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

As identified above, the 2022 Scoping Plan Update contains GHG reduction measures that work toward reducing GHG emissions, consistent with the targets set by EO B-30-15 and codified by SB 32 and AB 197. The measures applicable to the proposed project include energy efficiency measures, water conservation and efficiency measures, and transportation and motor vehicle measures, as discussed below.

Energy efficiency measures are intended to maximize energy-efficient building and appliance standards; pursue additional efficiency efforts, including new technologies and new policy and implementation mechanisms; and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. As identified above, the proposed project would comply with the latest California Green Building Standards (CALGreen Code) regarding energy conservation and green building infrastructure. Therefore, the proposed project would comply with applicable energy measures.

Water conservation and efficiency measures are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As noted above, the project would be required to comply with the latest CALGreen Code standards, which include a variety of different measures, including reduction of wastewater and water use. The proposed project would also include drought tolerant landscape and would be required to comply with the California Model Water Efficient Landscape Ordinance. Therefore, the proposed project would not conflict with any of the water conservation and efficiency measures.

The goal of transportation and motor vehicle measures is to develop regional GHG emission reduction targets for passenger vehicles. Specific regional emission targets for transportation emissions would not directly apply to the proposed project. However, vehicles traveling to the project site would comply with the Pavley II (LEV III) Advanced Clean Cars Program. The second phase of Pavley standards will reduce GHG emissions from new cars by 34 percent from 2016 levels by 2025. Therefore, the proposed project would not conflict with the identified transportation and motor vehicle measures.

The proposed project would comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals.

[75] California Air Resources Board (CARB). 2022. California's 2022 Climate Change Scoping Plan. November.

2024–2050 RTP/SCS. The SCAG 2024–2050 RTP/SCS was adopted on April 4, 2024. SCAG's RTP/SCS identifies that land use strategies that focus on new housing and job growth in areas served by high-quality transit and other opportunity areas would be consistent with a land use development pattern that supports and complements the proposed transportation network. The core vision in the 2024–2050 RTP/SCS is to better manage the existing transportation system through design management strategies, integrate land use decisions and technological advancements, create complete streets that are safe to all roadway users, preserve the transportation system, and expand transit and foster development in transit-oriented communities. The 2024–2050 RTP/SCS contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as a forecasted development pattern that is generally consistent with regional-level General Plan data. The forecasted development pattern, when integrated with the financially constrained transportation investments identified in the 2024–2050 RTP/SCS, would reach the regional target of reducing GHG emissions from automobiles and light-duty trucks by 19 percent per capita by 2035 (compared to 2005 levels). The 2024–2050 RTP/SCS does not require that local General Plans, Specific Plans, or zoning be consistent with the 2024–2050 RTP/SCS, but it does provide incentives for consistency to governments and developers.

Implementing SCAG's RTP/SCS will greatly reduce the regional GHG emissions from transportation, helping to achieve statewide emissions reduction targets. The proposed project would not conflict with the stated goals of the RTP/SCS; therefore, the proposed project would not interfere with SCAG's ability to achieve the region's GHG reduction targets of 19 percent below 2005 per capita emissions levels by 2035, and it can be assumed that regional mobile emissions would decrease in line with the goals of the RTP/SCS. Furthermore, the proposed project is not regionally significant per State CEQA Guidelines Section 15206, and, as such, it would not conflict with the SCAG RTP/SCS targets since those targets were established and are applicable on a regional level.

The proposed project would consist of a 191,394-square-foot light industrial building. Based on the nature of the proposed project, it is anticipated that implementation of the proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS. Therefore, the proposed project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Impacts would be less than significant, and no mitigation is required.

4.5.8 Level of Significance Prior to Mitigation

The proposed project would not result in any significant impacts related to GHG emissions, and no mitigation is required.

4.5.9 Regulatory Compliance Measures and Mitigation Measures

The proposed project would not result in any significant impacts related to GHG emissions, and no mitigation is required.

4.5.10 Level of Significance after Mitigation

The proposed project would not result in any significant impacts related to GHG emissions.

4.5.11 Cumulative Impacts

Cumulative impacts are the collective impacts of one or more past, present, or reasonably foreseeable probable future projects, that when combined, result in adverse changes to the environment. Climate change is a global environmental problem in which: (1) any given development project contributes only a small portion of any net increase in GHGs, and (2) global growth is continuing to contribute large amounts of GHGs across the world. Land use projects may contribute to the phenomenon of global climate change in ways that would be experienced worldwide, and with some specific effects felt in California. However, no scientific study has established a direct causal link between individual land use project impacts and global warming.

Table 4.1: Summary of Cumulative Projects identifies the past, present, and reasonably foreseeable probable future projects that when considered with the proposed project could result in cumulative impacts. The analysis of impacts related to GHG emissions is inherently cumulative. Potential cumulative impacts would occur if the proposed project, when considered with the cumulative projects would result in significant impacts to GHGs. As discussed in Section 4.5.7, while the proposed project would generate GHGs as part of project construction and operations, these emissions would not exceed applicable thresholds. In addition, the proposed project would not conflict with applicable statewide and regional climate action plans and policies. Therefore, the proposed project's GHG emissions would not be cumulatively considerable and cumulative impacts associated with the proposed project would be less than significant.

4.6 NOISE

This section evaluates the potential short-term and long-term noise impacts associated with the construction and operation of the 5665 Plaza Drive Project (proposed project). This section is based in part on information provided in the Noise Element of the City of Cypress General Plan. The assumptions used in the noise analysis and the noise modeling results are provided in **Appendix G** of this Draft EIR.

4.6.1 Scoping Process

The City received 3 comment letters during the public review period for the NOP. For copies of the NOP comment letters, refer to **Appendix A** of this Draft EIR. One comment letter included comments related to noise.

The letter from Los Alamitos received on June 5, 2024, suggest that the Draft EIR should evaluate the proposed project's noise impact from the proposed land use change, proximity to sensitive receptors, and maximum noise levels indicates in the applicable General Plans (including the City of Los Alamitos General Plan).

The Letter from Warland Investments Company and Affiliated Entities received on June 5, 2024, suggest that the proposed project has a foreseeable use as a logistics center, stating that logistics centers can generate more significant noise impacts than typical warehousing projects.

4.6.2 Regulatory Setting

4.6.2.1 Federal Regulations

Federal Transit Administration. The USDOT Federal Transit Administration (FTA) identifies guidelines for the maximum acceptable vibration levels for different types of land uses. These guidelines are based on the potential for interference or annoyance from vibration levels in a building and the potential for building damage. According to the FTA, ground vibrations from construction activities generally do not reach levels that can damage structures, but they can achieve the audible and feel-able ranges in buildings very close to the construction site. Exceptions include non-engineered timber and masonry buildings such as residential buildings and old or fragile buildings, where special care must be taken to avoid damage. Construction activity can result in varying degrees of ground-borne vibration, depending on the equipment and methods used, distance to the affected structures, and soil type. Construction vibration is generally associated with pile driving and rock blasting. Other construction equipment, such as air compressors, light trucks, and hydraulic loaders, generates little or no ground vibration.

4.6.2.2 State Regulations

Noise Control Act (Health & Safety Code §§ 46000-46080). The California Noise Control Act states that excessive noise is a serious hazard to public health and welfare and that it is the policy of the State to provide an environment for all Californians that is free from noise that jeopardizes their health or welfare. The goal is to minimize the number of people that would be exposed to excessive noise but not create an environment completely free from any noise.

State of California General Plan Guidelines. The State of California regulates vehicular and freeway noise affecting classrooms, sets standards for sound transmission and occupational noise control, and identifies noise insulation standards and airport noise/land-use compatibility criteria. The State of California OPR's 2017 *General Plan Guidelines* (OPR 2017), also provide guidance for the acceptability of projects within specific Community Noise Equivalent Level (CNEL)/day-night average noise level (L_{dn}) contours. The General Plan Guidelines present adjustment factors that may be used in order to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution.

4.6.2.3 Regional Regulations

There are no regional regulations related to noise that are applicable to the proposed project.

4.6.2.4 Local Regulations

City of Cypress General Plan. The development of effective strategies to reduce impacts of excessive noise is an essential part of the land use planning process. Since 1971, the Noise Element has been one of the seven mandatory elements of a General Plan. The Noise Element requires that noise sources be considered in establishing land use patterns so as to minimize exposure of residents to excessive noise. The Noise Element of the City's General Plan[76] works to achieve and maintain environmental noise levels compatible with land use by establishing goals, policies, and programs to ensure that Cypress residents will be protected from excessive noise. The City's Noise Element serves as a guideline for compliance with the State's noise insulation standards. Applicable Noise Element objectives and policies include the following:

- **N-1** Reduce noise impacts from transportation noise sources.
- **N-2** Incorporate noise considerations into land use planning decisions.
- **N-3** Minimize noise spillover from commercial uses into nearby residential neighborhoods.
- **N-4** Minimize the noise impacts associated with the development of residential units above ground floor commercial uses in mixed use developments.
- **N-5** Develop measures to control non-transportation noise impacts.

Additionally, the City's General Plan Noise Element has established interior and exterior noise standards for various land use categories shown in **Table 4.6.1**. As shown in **Table 4.6.1**, the City's exterior and interior noise standards are 50–60 A-weighted decibels (dBA) CNEL and 45–55 dBA CNEL, respectively, for single- and multifamily residences. It should be noted that the City's exterior noise standard only applies to private yards of single-family residences, private patios, or balconies

[76] City of Cypress. 2001. *City of Cypress General Plan* Noise Element. <https://www.cypressca. org/home/showpublisheddocument/718/636123119313270000> (accessed June 3, 2023).

Table 4.6.1: City of Cypress Interior and Exterior Noise Standards

Land Use Categories		dBA CNEL	
Categories	**Uses**	**Interior[1]**	**Exterior[2]**
Residential	Single Family Duplex, Multiple Family	45[3]–55	50–60
	Mobile Home	45	65[4]
Commercial Industrial	Hotel, Motel, Transient Lodging	45	--
	Commercial Retail, Bank, Restaurant	55	--
	Office Building, Research and Development, Professional Offices, City Office Building	50	--
	Amphitheater, Concert Hall Auditorium, Meeting Hall	45	--
	Gymnasium (Multipurpose)	50	--
	Sports Club	55	--
	Manufacturing, Warehousing, Wholesale, Utilities	65	--
	Movie Theaters	45	--
Institutional	Hospital, Schools' Classrooms	45	65
	Church, Library	45	--
Open Space	Parks	--	65

Source: City of Cypress General Plan Noise Element, Table N-3.
[1] Indoor environmental including: bedrooms, living areas, bathrooms, toilets, closets, corridors.
[2] Outdoor environments limited to: private yards of single-family residences, private patios, or balconies of multifamily residences which are served by a means of exit from inside the dwelling (balconies 6 ft deep or less are exempt), mobile home parks, park picnic areas, and school playgrounds.
[3] Noise level requirement with closed windows. Mechanical ventilation system or other means of natural ventilation shall be provided as of Chapter 12, Section 1205 of the Uniform Building Code.
[4] Exterior noise levels should be such that interior noise levels will not exceed 45 dBA CNEL.
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibels

of multifamily residences which are served by a means of exit from inside the dwelling, mobile home parks, park picnic areas, and school playgrounds. Multifamily residences with balconies that are 6 feet deep or less are exempt from the City's exterior noise standard. Although the City's interior noise standard is 45–55 dBA CNEL, the interior noise standard of 45 dBA CNEL was used for a conservative noise analysis.

Although the City has not adopted exterior noise standards for hotels, movie theaters, and commercial uses, the City has established an interior noise standard of 45 dBA CNEL for hotels and movie theaters and an interior noise standard of 55 dBA CNEL for commercial retail and restaurant uses.

City of Cypress Municipal Code. The Cypress Municipal Code Chapter 13, Article VII, Sections 13-64 through 13-79, establish noise standards and enforcement procedures to enforce the reduction of "obnoxious or offensive" noises.

More specifically, Chapter 13, Article VII, Sections 13-67 through 13-69, establish the noise zone designations, exterior noise level standards, and interior noise level standards. Section 13-67 specifies that residential properties in the City are assigned to the following noise zones:

> **Noise Zone 1:** All residential properties zoned RS-15000 or RS-6000 (low-density residential uses with a maximum of 5 dwelling units per gross acre).
>
> **Noise Zone 2:** All residential property not in Noise Zone 1.

Section 13-68 (a), as shown in **Table 4.6.2**, presents the exterior noise level standards for Noise Zone 2, which would apply to the proposed project as the nearest sensitive uses are not zoned RS-15000 or RS-6000. In the event the alleged offensive noise consists of impact noise, simple tone noise, speech, music, or any combination thereof, each of the above noise levels shall be reduced by 5 dBA.

Table 4.6.2: Exterior Noise Level Standards

Noise Zone	Noise Level (dBA L_{eq})	Time Period
1	55	7:00 a.m. – 10:00 p.m.
	50	10:00 p.m. – 7:00 a.m.
2	60	7:00 a.m. – 10:00 p.m.
	55	10:00 p.m. – 7:00 a.m.

Source: City of Cypress Municipal Code Section 13-68 (a) (1976).
dBA = A-weighted decibels
L_{eq} = Average Hourly Noise Level

Section 13-68 of the Cypress Municipal Code goes on to state in subsection (b) the following:

> "It shall be unlawful for any person at any location within the incorporated area of the city to create any noise, or to allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person, when the foregoing causes the noise level, when measured on any other residential property, either incorporated or unincorporated, to exceed:"
>
> (1) The noise standard for a cumulative period of more than 30 minutes in any hour; or
>
> (2) The noise standard plus 5 dB(A) for a cumulative period of more than 15 minutes in any hour; or
>
> (3) The noise standard plus 10 dB(A) for a cumulative period of more than 5 minutes in any hour; or
>
> (4) The noise standard plus 15 dB(A) for a cumulative period of more than 1 minute in any hour; or
>
> (5) The noise standard plus 20 dB(A) for any period of time.

Subsection (c) also specifies the following:

> "In the event the ambient noise level exceeds either of the first four (4) noise limit categories above, the cumulative period applicable to said category shall be increased to reflect said ambient noise level. In the event the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under said category shall be increased to reflect the maximum ambient noise level."

Section 13-69(a), as shown in **Table 4.6.3**, presents the interior noise level standards for all residential zones.

Table 4.6.3: Interior Noise Level Standards

Noise Zone	Noise Level (dBA L_{eq})	Time Period
1 and 2	55	7:00 a.m. – 10:00 p.m.
	45	10:00 p.m. – 7:00 a.m.

Source: City of Cypress Municipal Code (1976).
dBA = A-weighted decibels
L_{eq} = Average Hourly Noise Level

Section 13-69(a) also states the following for the noise levels shown in **Table 4.6.3**:

> "In the event the alleged offensive noise consists of impact noise, simple tone noise, speech, music, or any combination thereof, each of the above noise levels shall be reduced by five (5) dBA."

Section 13-69(b) of the Cypress Municipal Code states the following:

> "It shall be unlawful for any person at any location within the incorporated area of the city to create any noise, or to allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person, when the foregoing causes the noise level, when measured on any other residential property, either incorporated or unincorporated, to exceed:
>
> (1) The interior noise standard for a cumulative period of more than 5 minutes in any hour; or
>
> (2) The interior noise standard plus 5 dB(A) for a cumulative period of more than 1 minute in any hour; or
>
> (3) The interior noise standard plus 10 dB(A) for any period of time."

Subsection (c) also specifies the following:

> "In the event the ambient noise level exceeds either of the first two (2) noise limit categories above, the cumulative period applicable to said category shall be increased to reflect said ambient noise level. In the event the ambient noise level exceeds the third noise limit category, the maximum allowable noise level under said category shall be increased to reflect the maximum ambient noise level."

Section 13-70, Special Provisions, of the City's Municipal Code specifies that construction activities are exempt from the provisions listed above; however, it regulates the timing of construction activities. According to the Municipal Code, construction activities shall not take place between the hours of 8:00 p.m. and 7:00 a.m. on weekdays, before 9:00 a.m. and after 8:00 p.m. on Saturday, or at any time on Sunday or a federal holiday.

Section 13-71, Schools, hospitals and churches; special provisions, of the Municipal Code states the following:

> "It shall be unlawful for any person to create any noise which causes the noise level at any school, hospital or church while the same is in use, to exceed the noise limits as specified in section 13-68 prescribed for the assigned noise zone in which the school, hospital or church is located, or which noise level unreasonably interferes with the use of such institutions or which unreasonably disturbs or annoys patients in the hospital, provided conspicuous signs are displayed in three (3) separate locations within one-tenth (0.1) of a mile of the institution indicating the presence of a school, church or hospital."

Vibration Standards. Due to the lack of vibration standards within the City's General Plan or Municipal Code, vibration standards included in the FTA's 2018 *Transit Noise and Vibration Impact Assessment Manual* (FTA Manual) are used in this analysis for ground-borne vibration impacts, as shown in **Table 4.6.4**.

Table 4.6.4: Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
Reinforced concrete, steel, or timber (no plaster)	0.50
Engineered concrete and masonry (no plaster)	0.30
Nonengineered timber and masonry buildings	0.20
Buildings extremely susceptible to vibration damage	0.12

Source: *Transit Noise and Vibration Impact Assessment Manual*, Table 12-3 (FTA 2018).
[1] RMS vibration velocity in decibels (VdB) re 1 micro-inch/second.
FTA = Federal Transit Administration
in/sec = inches per second
L_V = velocity in decibels
PPV = peak particle velocity
RMS = root-mean-square
VdB = vibration velocity in decibels

The criteria for environmental impact from ground-borne vibration and noise are based on the maximum levels for a single event. **Table 4.6.4** lists the potential vibration damage criteria associated with construction activities, as suggested in the FTA Manual.

The FTA Manual guidelines show that a vibration level of up to 0.5 inch per second (in/sec) in peak particle velocity (PPV) is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. For a nonengineered timber and masonry building, the construction vibration damage criterion is 0.2 in/sec in PPV.

4.6.3 Existing Environmental Setting

4.6.3.1 Overview of the Existing Noise Environment

The primary existing noise sources in the vicinity of the project site are associated with surface streets such as Valley View Street and Katella Avenue and include automobile and truck activities.

4.6.3.2 Existing Sensitive Land Uses in the Project Vicinity

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Noise-sensitive land uses include residences, hospitals, school classrooms,

churches, libraries, and parks. The closest noise-sensitive use along Plaza Drive is an existing hotel located 130 feet from the roadway. Land uses surrounding the project site include light industrial uses to the uses to the north, east, and west and office uses to the south. Additionally, two light industrial buildings are currently under construction directly east of the project site.

4.6.3.3 Existing Noise Levels

In order to assess the existing noise conditions in the area, long-term (24-hour) noise-level measurements were conducted on October 10 and 11, 2023, using three (3) Larson Davis Spark 706RC Dosimeters at ~~four~~ three locations near the edge of the project site. **Figure 4.6.1, Noise Monitoring Locations,** shows the long-term noise monitoring locations. **Table 4.6.5** provides a summary of the measured hourly noise levels and calculated CNEL level from the long-term noise level measurements as well as a brief description of the locations where the measurements were collected. As shown in **Table 4.6.5**, the calculated CNEL levels range from 54.3 dBA CNEL to 62.3 dBA CNEL. Hourly noise levels at surrounding noise-sensitive uses are as low as 41.8 dBA equivalent continuous sound level (L_{eq}) during nighttime hours and 48.8 dBA L_{eq} during daytime hours.

4.6.3.4 Existing Aircraft Noise Levels

The Joint Forces Training Base (JFTB) Los Alamitos is located approximately 0.4 mile southwest of the project site in the City of Los Alamitos. The noise contour boundaries of JFTB show that the project site is located outside of Noise Impact Zone 2 (60 dB CNEL or greater).

4.6.4 Methodology

Evaluation of noise and vibration impacts associated with the proposed project includes the following:

- Determination of the short-term construction noise and vibration impacts.
- Determination of the long-term off-site and on-site traffic noise impacts.
- Determination of the long-term stationary noise impacts from project operations.
- Determination of the required mitigation measures to reduce short-term construction–related noise and vibration impacts and long-term stationary and mobile source noise impacts.

The evaluation of noise and vibration impacts was prepared in conformance with appropriate standards, utilizing procedures and methodologies in the City of Cypress Noise Element and Municipal Code and FTA criteria.

4.6.4.1 Characteristics of Sound

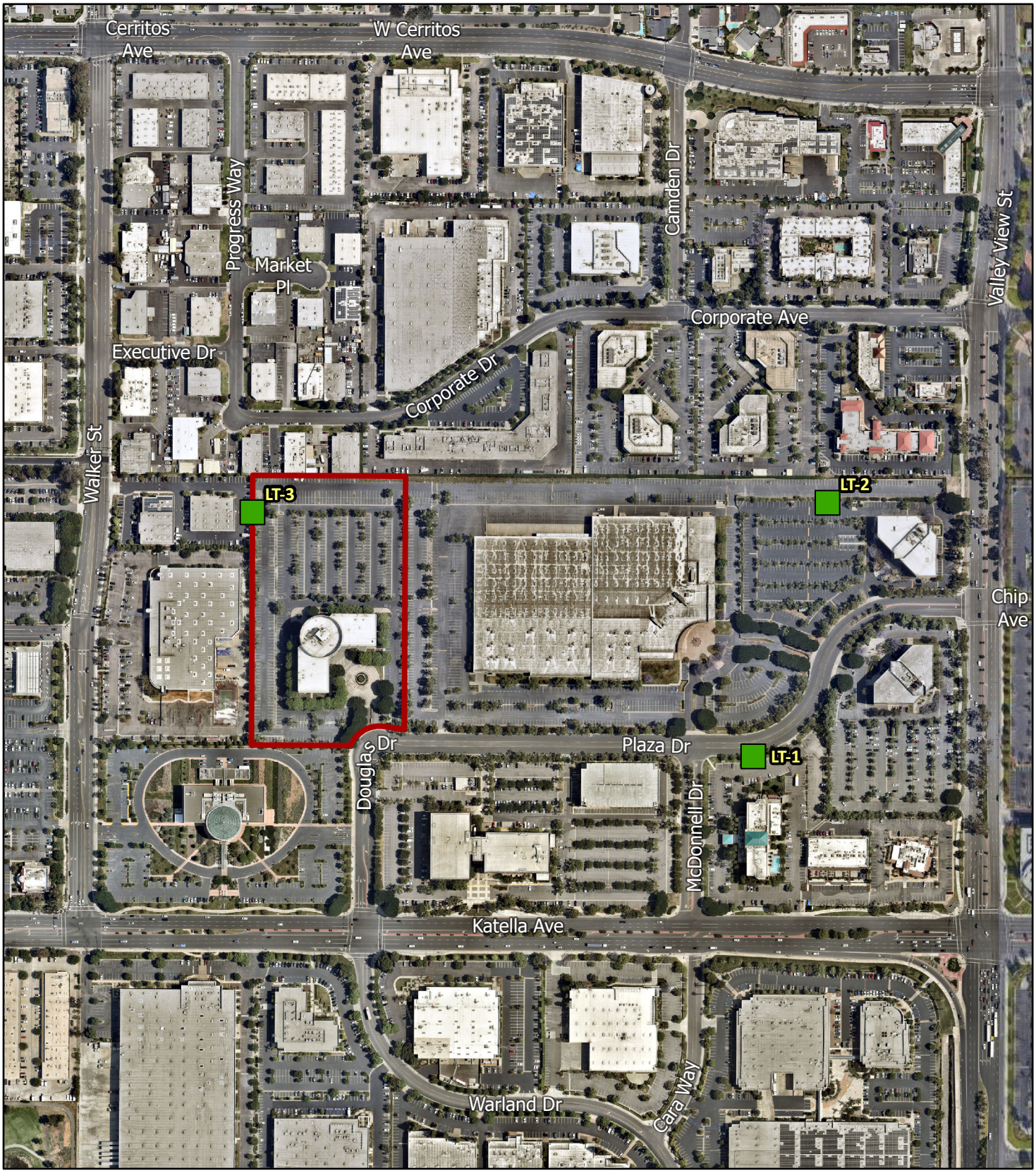
Noise is usually defined as “unwanted sound.” Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, or when it has adverse effects on health.

To the human ear, sound has two important characteristics: pitch and loudness. Pitch is generally an annoyance, while loudness can affect the ability to hear. Pitch is the number of complete vibrations, or cycles per second, of a wave resulting in the tone’s range from high to low.

Table 4.6.5: Existing Noise Level Measurements

Location	Description	Daytime Noise Levels[1] (dBA L_{eq})	Evening Noise Levels[2] (dBA L_{eq})	Nighttime Noise Levels[3] (dBA L_{eq})	Daily Noise Level (dBA CNEL)
LT-1	Approximately 185 ft east of the Plaza Drive and McDonnell Drive intersection.	54.3-68.0	49.7-61.6	46.2-59.0	62.3
LT-2	Approximately 460 ft west of the Valley View Street centerline and approximately 160 ft south of the existing hotel at 5990 Corporate Avenue.	53.8-60.3	50.5-55.7	47.3-54.6	58.8
LT-3	On the western property line of the project site, 455 ft east of the Walker Street centerline and 100 ft south of the northern property line.	48.8-55.8	46.9-55.0	41.8-48.6	54.3

Source: LSA (2023).
Note: Noise measurements were conducted from October 10 to October 11, 2023, starting at 1:00 p.m.
[1] Daytime Noise Levels = noise levels during the hours of 7:00 a.m. to 7:00 p.m.
[2] Evening Noise Levels = noise levels during the hours from 7:00 p.m. to 10:00 p.m.
[3] Nighttime Noise Levels = noise levels during the hours of 10:00 p.m. to 7:00 a.m.
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
ft = foot/feet
L_{eq} = the average noise level during a specific hour
LT = long-term measurement



LSA

Project Site

Long-term Noise Monitoring Location

FIGURE 4.6-1

N

0 200 400

FEET

SOURCE: Nearmap (June 17, 2023)

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5665 Plaza Drive Project Draft Environmental Impact Report

Noise Monitoring Locations

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Loudness is the strength of a sound that describes a noisy or quiet environment and is measured by the amplitude of the sound wave. Loudness is determined by the intensity of the sound waves combined with the reception characteristics of the human ear. Sound intensity is the average rate of sound energy transmitted through a unit area perpendicular to the direction in which the sound waves are traveling. This characteristic of sound can be precisely measured with instruments. In analyzing the potential noise impacts of a proposed project, the existing noise environment in the vicinity of the project site is identified and the potential noise effects of the project are evaluated in terms of sound intensity and the effect on adjacent sensitive land uses.

4.6.4.2 Measurement of Sound

Sound intensity is measured through the A-weighted decibel (dBA) scale to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound similar to the human ear's de-emphasis of these frequencies. Decibels (dB), unlike the linear scale (e.g., inches or pounds), is a scale based on powers of 10.

Each interval of 10 dB indicates a sound energy 10 times greater than before. For example, 10 dB is 10 times more intense than 0 dB, 20 dB is 100 times more intense than 0 dB, and 30 dB is 1,000 times more intense than 0 dB. Thirty (30 dB) dB represents 1,000 times as much acoustic energy as 0 dB. The decibel scale increases as the square of the change, representing the sound pressure energy. A sound as soft as human breathing is about 10 times greater than 0 dB. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. A 10 dB increase in sound level is perceived by the human ear as a doubling of the loudness of the sound. Ambient sounds generally range from 30 dB (very quiet) to 100 dB (very loud).

Sound levels are generated from a source, and their decibel level decreases as the distance from that source increases. Sound dissipates exponentially with distance from the noise source. For a single point source, sound levels decrease approximately 6 dB for each doubling of distance from the source. This drop-off rate is applicable to noise generated by stationary equipment. If noise is produced by a line source (which approximates the effect of several point sources), such as highway traffic or railroad operations, the sound decreases 3 dB for each doubling of distance in a hard site environment. Line source sound levels decrease 4.5 dB for each doubling of distance in a relatively flat environment with absorptive vegetation.

There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also account for the annoying effects of sound. The L_{eq} is the total sound energy of time-varying noise over a sample period. However, the predominant rating scales for communities in the State of California are the L_{eq} and CNEL or the L_{dn} based on A-weighted decibels. CNEL is the time-weighted average noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly L_{eq} for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and a 10 dBA weighting factor applied to noises occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). L_{dn} is similar to the CNEL scale but without the adjustment for events occurring during the relaxation. CNEL and L_{dn} are within 1 dBA of each other and are normally interchangeable.

Other noise rating scales used when assessing the annoyance factor of noise include the maximum noise level (L_{max}), which is the highest exponential time-averaged sound level that occurs during a stated time period. Short-term noise impacts are specified in terms of maximum levels denoted by L_{max}. L_{max} reflects peak operating conditions and addresses the annoying aspects of intermittent noise. For enforcement purposes, it is often used with another noise scale (or noise standards in terms of percentile noise levels) in noise ordinances. For example, the L_{10} noise level represents the noise level exceeded 10 percent of the time during a stated period. The L_{50} noise level represents the median noise level. Half the time the noise level exceeds this level, and half the time it is less than this level. The L_{90} noise level represents the noise level exceeded 90 percent of the time and is considered the background noise level during a monitoring period.

4.6.4.3 Vibration

According to the USDOT FTA Manual, vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or anthropogenic causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency. Vibration is often described in units of velocity (inches per second) and discussed in decibel units in order to compress the range of numbers required to describe vibration. Vibration impacts are generally associated with activities such as train operations, construction, and heavy truck movements.

The background vibration velocity level in residential areas is generally 50 vibration velocity decibels (VdB). Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The relevant range of vibration for the purposes of this analysis is from approximately 50 VdB, the typical background vibration velocity level, to 100 VdB, the general threshold where minor damage can occur in fragile buildings.

4.6.5 Thresholds of Significance

A project would normally have a significant effect on the environment related to noise if it would substantially increase the ambient noise levels for adjoining areas or conflict with the adopted environmental plans and the goals of the community in which the project is located. The following noise level increases were used to determine whether the project would result in a significant noise impact:

For off-site transportation-related impacts:

- Where the existing ambient noise level is less than 65 dBA and a project-related permanent increase in ambient noise levels of 3 dBA CNEL or greater occurs.
- Where the existing ambient noise level is greater than 65 dBA and a project-related permanent increase in ambient noise levels of 1 dBA CNEL or greater occurs.

For non-transportation-related stationary source impacts, including operations:

- If current noise levels experienced at the surrounding noise-sensitive uses are less than the hourly daytime noise level standards, then an exceedance of the standards listed in **Table 4.6.2** would constitute a potentially significant impact.
- If current noise levels experienced at the surrounding noise-sensitive uses are greater than the hourly daytime noise level standard listed in **Table 4.6.2**, then a perceptible increase of 3 dBA or more would constitute a potentially significant impact.

For construction-related impacts:

- Compliance with the City's Municipal Code and exceedance of the FTA standards listed above and in **Table 4.6.4**.

The thresholds for noise impacts used in this analysis are consistent with Appendix G of the State CEQA Guidelines and the City's Initial Study/Environmental Checklist. The proposed project may be deemed to have a significant impact with respect to noise if it would:

Threshold NOI-1: Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Threshold NOI-2: Generation of excessive groundborne vibration or groundborne noise levels?

Threshold NOI-3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Section 4.13, Noise, of the Initial Study (**Appendix B**) prepared for the proposed project concluded the proposed project would have less than significant impacts to ambient noise levels in the vicinity of the project site (Threshold NOI-1) and noise levels related to the proximity of private airstrips and airports (Threshold NOI-3). The proposed project would result in less than significant impact with mitigation incorporated for impacts related to the generation of excessive ground-borne vibration or ground-borne noise levels (Threshold NOI- 2).

4.6.6 Project Impacts

Threshold NOI-1: **Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Impact NOI-1: Less Than Significant Impact.

Construction Noise Impacts. Short-term noise impacts would be associated with demolition of the existing office building, excavation, grading, and construction of the proposed structure. Construction-related short-term noise levels would be higher than existing ambient noise levels in the vicinity of the project site at the present time but would no longer occur once construction of the proposed project is completed.

Two types of short-term noise impacts could occur during construction of the proposed project. First, construction crew commutes and the transport of construction equipment and materials to the project site would incrementally increase noise levels on access roads leading to the site. Although there would be a relatively high single-event noise exposure potential causing intermittent noise nuisance, the effect on longer-term (hourly or daily) ambient noise levels would be small when compared to existing average daily traffic (ADT) volumes of 800 vehicles on Plaza Drive, 39,950 vehicles on Katella Avenue, and 42,050 vehicles on Valley View Street (Urban Crossroads 2023).[77] Because construction-related vehicle trips would not approach the daily traffic volumes on these roadways, traffic noise would not increase by 3 dBA. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. It should be noted that the closest noise-sensitive use along Plaza Drive is an existing hotel located 130 feet from the roadway.

Therefore, short-term, construction-related impacts associated with worker commute and equipment transport to the project site would be less than significant.

In addition to the reference maximum noise level, the usage factor provided in **Table 4.6.6** is utilized to calculate the hourly noise level impact for each piece of equipment based on the following equation:

$$L_{eq}(equip) = E.L. + 10\log(U.F.) - 20\log\left(\frac{D}{50}\right)$$

where: $L_{eq}(equip)$ = L_{eq} at a receiver resulting from the operation of a single piece of equipment over a specified time period

E.L. = noise emission level of the particular piece of equipment at a reference distance of 50 feet

U.F. = usage factor that accounts for the fraction of time that the equipment is in use over the specified period of time

D = distance from the receiver to the piece of equipment

[77] Urban Crossroads. 2023. *Goodman Commerce Center Traffic Analysis*. December 15, 2023.

Table 4.6.6: Typical Maximum Construction Equipment Noise Levels (L_{max})

Type of Equipment	Acoustical Usage Factor	Suggested Maximum Sound Levels for Analysis (dBA L_{max} at 50 ft)
Air Compressor	40	80
Backhoe	40	80
Cement Mixer	50	80
Concrete/Industrial Saw	20	90
Crane	16	85
Excavator	40	85
Forklift	40	85
Generator	50	82
Grader	40	85
Loader	40	80
Pile Driver	20	101
Paver	50	85
Roller	20	85
Rubber Tire Dozer	40	85
Scraper	40	85
Tractor	40	84
Truck	40	84
Welder	40	73

Source: Federal Highway Administration. *Highway Construction Noise Handbook* (FHWA 2006).
dBA = A-weighted decibel(s)
ft = foot/feet
L_{max} = maximum instantaneous noise level

Each piece of construction equipment operates as an individual point source. Utilizing the following equation, a composite noise level can be calculated when multiple sources of noise operate simultaneously:

$$Leq\ (composite) = 10 * \log_{10}\left(\sum_{1}^{n} 10^{\frac{Ln}{10}}\right)$$

Once composite noise levels are calculated, reference noise levels can then be adjusted for distance using the following equation:

$$Leq\ (at\ distance\ X) = Leq\ (at\ 50\ feet) - 20 * \log_{10}\left(\frac{X}{50}\right) Leq\ (at\ distance\ X)$$
$$= Leq\ (at\ 50\ feet) - 20 * \log_{10}\left(\frac{X}{50}\right)$$

In general, this equation shows that doubling the distance would decrease noise levels by 6 dBA, while halving the distance would increase noise levels by 6 dBA.

Using the equations from the methodology above, the reference information in **Table 4.6.6**, and the construction equipment list provided, the composite noise level of each construction phase was calculated. The project construction composite noise levels at a distance of 50 feet would range

from 74 dBA L_{eq} to 88 dBA L_{eq}, with the highest noise levels occurring during the site preparation and grading phases.

Based on the information in **Table 4.6.6**, the noise level generated by the construction phases were calculated. The combination of the equipment during the site preparation and grading phases, considering the usage factor of each piece of equipment, would result in a combined noise level of 59 dBA L_{eq} at a distance of 1,300 feet, which represents the distance from the center of construction activity at the project site to the nearest noise-sensitive use (Courtyard by Marriott) to the southeast. This noise level is less than the average daytime noise level measured to be approximately 61 dBA L_{eq} as described in **Table 4.6.5.** The combined construction and ambient noise level would create an increase of less than 3 dBA, the threshold at which the increase becomes perceptible in an outdoor environment. These predicted noise levels would only occur when all construction equipment is operating simultaneously; therefore, the noise levels are assumed to be rather conservative in nature. While construction-related short-term noise levels have the potential to be higher than existing ambient noise levels in the vicinity of the project site under existing conditions, the noise impacts would no longer occur once project construction is completed. During deep dynamic compaction activities, the major source of noise would be the crane utilized to drop the weight. Construction noise levels would be similar to those during building construction as that construction phase would also include the operation of a crane.

Compliance with the allowed construction hours in the City's Noise Ordinance would ensure that construction noise does not disturb residents during typical sleeping hours or during hours when ambient noise levels are likely to be lower (i.e., at night). In addition, the proposed project would implement several best practices for reducing construction noise, including, but not limited to, maximizing the distance between noise sources and sensitive receptors during construction activities, equipping construction equipment with properly operating and maintained noise mufflers, and establishing a noise disturbance coordinator for the proposed project. These best practices are included in **Regulatory Compliance Measure NOI-1**, provided below. Although construction noise would be higher than the ambient noise in the vicinity of the project site, it would cease to occur once project construction is completed. Additionally, with the incorporation of **Regulatory Compliance Measure NOI-1**, all feasible and reasonable measures to reduce construction noise would be implemented, and a less than significant impact would occur.

Long-Term Off-Site Traffic Noise Impacts. The Federal Highway Administration (FHWA) Highway Traffic Noise Prediction Model (FHWA RD-77-108) was used to evaluate traffic-related noise conditions in the vicinity of the project site. This model requires various parameters, including traffic volumes, vehicle mix, vehicle speed, and roadway geometry to compute typical equivalent noise levels during daytime, evening, and nighttime hours. The resultant noise levels are weighted and summed over 24-hour periods to determine the Community Noise Equivalent Level (CNEL) values. The existing and existing plus project traffic volumes in the vicinity of the project site were obtained from the Traffic Analysis prepared for the proposed project (Urban Crossroads 2023). **Table 4.6.7** lists the existing and existing plus project traffic noise levels adjacent to roadway segments in the project site vicinity. These noise levels represent worst-case scenarios, which assume that no shielding is provided between the traffic and the location where the noise contours are drawn.

Table 4.6.7: Traffic Noise Levels Without and With Proposed Project

Roadway Segment	Existing Without Project		Existing With Project			Opening Year Without Project		Opening Year With Project		
	ADT	CNEL (dBA) 50 feet from Centerline of Nearest Lane	ADT	CNEL (dBA) 50 feet from Centerline of Nearest Lane	Increase from Existing Conditions	ADT	CNEL (dBA) 50 feet from Centerline of Nearest Lane	ADT	CNEL (dBA) 50 feet from Centerline of Nearest Lane	Increase from Near-Term Conditions
Katella Avenue west of Douglas Drive	42,950	70.2	43,200	70.2	0.0	47,150	70.6	47,350	70.6	0.0
Katella Avenue east of Douglas Drive	39,950	69.9	40,050	69.9	0.0	43,750	70.3	43,850	70.3	0.0
Plaza Drive between Douglas Drive and McDonnell Drive	1,350	50.1	1,500	50.6	0.5	1,650	51.0	1,800	51.4	0.4
Plaza Drive between McDonnell Drive and Valley View Street	800	47.9	900	48.4	0.5	1,300	50.0	1,400	50.3	0.3
Douglas Drive Between Katella Avenue and Plaza Drive	1,000	48.8	1,450	50.5	1.7	1,350	50.1	1,600	50.9	0.8
McDonnell Drive Between Katella Avenue and Plaza Drive	350	44.2	350	44.2	0.0	350	44.2	350	44.2	0.0
Valley View Street north of Plaza Drive	42,050	70.1	42,200	70.1	0.0	44,800	70.4	44,950	70.4	0.0

Source: Compiled by LSA (December 2022).
Note: Traffic noise within 50 feet of the roadway centerline should be evaluated with site-specific information.
Shaded cells indicate roadway segments adjacent to the project site.
ADT = average daily traffic
CNEL= Community Noise Equivalent Level
dBA = A-weighted decibels

The results indicate that the increase in noise associated with project-related traffic would be very small, ranging from 0.0 to 1.7 dBA along the analyzed road segments. With those increases, as compared to existing ambient conditions, no significant noise impacts would result based on the applicable thresholds ([1]a 3.0 increase in dBA when the ambient is 65 dBA or less, or [2] a 1.0 increase in dBA when the ambient is 65 dBA or greater). No mitigation is required.

Long-Term Off-Site Stationary Noise Impacts. Implementation of the proposed project would generate various on-site stationary noise sources, including heating, ventilation, and air conditioning (HVAC) and dock operations. The Cypress Municipal Code limits non-construction noise experienced at surrounding noise-sensitive uses to 60 dBA or less per the hourly daytime noise level standards for Noise Zone 2. The closest sensitive use for the noise analysis is the Courtyard by Marriott Hotel located approximately 970 feet southeast of the project site.

Of the on-site stationary noise sources during operation of the project, noise generated by loading dock activities would generate the highest maximum noise levels. To provide a conservative analysis, it is assumed that operations would occur equally during all hours of the day and half of the project's 25 loading docks would be active at all times.

The project would have various rooftop mechanical equipment, including HVAC units, on the proposed building. To be conservative, it is assumed the project could have four (4) rooftop HVAC units that would operate 24 hours per day and would generate sound power levels (SPL) of up to 76 dBA SPL or 63 dBA L_{eq} at 5 feet, based on manufacturer data (Allied Commercial 2019).[78] Noise levels generated by cold storage fan units would be similar to noise readings from previously gathered reference noise level measurements, which generate a noise level of 57.5 dBA L_{eq} at 60 feet based on measurements taken by LSA.[79]

Noise levels generated by delivery trucks would be similar to noise readings from truck loading and unloading activities, which generate a noise level of 75 dBA L_{eq} at 20 feet based on measurements taken by LSA. Delivery trucks would arrive on site and maneuver their trailers so that trailers would be parked within the loading docks. During this process, noise levels are associated with the truck engine noise, air brakes, and back-up alarms while the truck is backing into the dock. These noise levels would occur for a shorter period of time (less than 5 minutes). After a truck enters the loading dock, the doors would be closed, and the remainder of the truck loading activities would be enclosed and therefore much less perceptible. To present a conservative assessment, it is assumed that unloading activities could occur at half of the 25 docks simultaneously for a period of more than 30 minutes in a given hour. Additionally, at the remaining half of the loading docks, it is conservatively assumed that refrigeration units attached to the trailers would be in operation while waiting to be unloaded. Based on reference measurements gathered by LSA, each unit would have a reference noise level of 79.4 dBA at 15 feet.

[78] Allied Commercial. 2019. KHB – K-Series Rooftop Units Standard and High Efficiency – 50 Hz Product Specifications. April.

[79] LSA. 2016. *Operational Noise Impact Analysis for Richmond Wholesale Meat Distribution Center.*

To determine the future noise impacts from project operations to the noise-sensitive uses, a 3-D noise model, SoundPLAN, was used to incorporate the site topography as well as the shielding from the proposed building on site. A graphic representation of the potential operational noise impacts is presented in **Appendix G** of this Draft EIR. The results show the 60 dBA L_{eq} daytime noise contour from operations and the 55 dBA L_{eq} nighttime noise contour from operations would not approach the closest noise-sensitive uses. The estimated noise level at the closest noise-sensitive uses would be less than 34 dBA L_{eq}. Additionally, the proposed project would not substantially increase noise levels over existing conditions. Therefore, this impact would be less than significant. No mitigation is required.

Threshold NOI-2: Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels?

Impact NOI-2: Less Than Significant with Mitigation Incorporated. Vibration refers to ground-borne noise and perceptible motion. Ground-borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors. Vibration energy propagates from a source, through intervening soil and rock layers, to the foundations of nearby buildings. The vibration then propagates from the foundation throughout the remainder of the structure.

Typical sources of ground-borne vibration are construction activities (e.g., pavement breaking and operating heavy-duty earthmoving equipment), rail activity, and occasional traffic on rough roads. In general, ground-borne vibration from standard construction practices is only a potential issue when within 25 feet of vibration-sensitive uses. Ground-borne vibration levels from construction activities very rarely reach levels that can damage structures; however, these levels are perceptible near the active construction site. With the exception of older buildings built prior to the 1950s or buildings of historic significance, potential structural damage from heavy construction activities rarely occurs. When roadways are smooth, vibration from traffic (even heavy trucks) is rarely perceptible.

The roadways surrounding the project site, including Plaza Drive, McDonnell Drive, and the existing driveways, are paved, smooth, and unlikely to cause significant ground-borne vibration. In addition, the rubber tires and suspension systems of buses and other on-road vehicles make it unusual for on-road vehicles to cause ground-borne noise or vibration problems. It is, therefore, assumed that no such vehicular vibration impacts would occur and, therefore, no vibration impact analysis of on-road vehicles is necessary.

Construction Vibration Impacts. Construction of the proposed project could result in the generation of ground-borne vibration. This construction vibration impact analysis discusses the potential for building damages using vibration levels in PPV (in/sec) because vibration level in PPV is best used to characterize potential for damage. The 2018 FTA Manual guidelines indicate that a vibration level up to 0.5 in/sec in PPV is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. For a non-engineered timber and masonry building, the construction vibration damage criterion is 0.2 in/sec in PPV. Based on information provided by the Project Applicant, the surrounding structures are made of tilt-up concrete; therefore, the vibration analysis will utilize a criterion of 0.5 in/sec PPV.

Table 4.6.8 shows the PPV values at 25 feet from a construction vibration source. As shown in this table, bulldozers and other heavy-tracked construction equipment (except for pile drivers and vibratory rollers) generate approximately 0.089 in/sec PPV of ground-borne vibration when measured at 25 feet, based on the 2018 FTA Manual. In addition to standard vibration reference information, **Table 4.6.8** also includes reference vibration data previously gathered during deep dynamic compaction (DDC) operations.

Table 4.6.8: Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV (in/sec) at 25 ft
Deep Dynamic Compaction (10 ton, 60 ft Drop)	0.970[1]
Pile Driver (Impact), Typical	0.644
Pile Driver (Sonic), Typical	0.170
Vibratory Roller	0.210
Hoe Ram	0.089
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Trucks	0.076
Jackhammer	0.035
Small Bulldozer	0.003

Sources: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018), Measured DDC data from G3SoilWorks Inc.
[1] PPV vibration data for deep dynamic compaction activities is at a reference distance of 50 ft.
DDC = deep dynamic compaction
ft = foot/feet
FTA = Federal Transit Administration
in/sec = inches per second
PPV = peak particle velocity

In addition to DDC operations used during foundation preparation, construction activities for the proposed project are expected to include the use of bulldozers and loaded trucks. The greatest levels of vibration are anticipated to occur during the foundation preparation phase. All other phases are expected to result in lower vibration levels.

The distance to the nearest buildings for the vibration impact analysis is measured between the nearest off-site buildings and the project site boundary (assuming the construction equipment would be used at or near the project site boundary) because vibration impacts occur normally within buildings. The formula for vibration transmission is provided below.

$$PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$$

The distance to the nearest buildings for the vibration impact analysis during DDC is measured between the nearest off-site buildings and the edge of the proposed building at 50 feet, indicating where DDC is needed. The formula for vibration transmission was calculated based on data provided by G3SoilWorks Inc. and is provided in **Appendix F** of this Draft EIR.

For typical construction activity, the equipment with the highest vibration generation potential is the large bulldozer, which would generate 0.089 PPV in/sec at 25 feet. The closest surrounding buildings to the project site include existing industrial buildings located approximately 5 feet north of the edge of the project site. The industrial building would experience vibration levels of up to

0.995 in/sec PPV. This vibration level at the nearest building from construction equipment would potentially exceed the FTA threshold of 0.5 in/sec PPV for building damage. At a distance of approximately 8 feet from typical construction activities, vibration levels would approach 0.492 in/sec PPV and would be below the FTA criteria of 0.5 in/sec PPV. While construction could result in vibration damage, impacts would be reduced to less than significant, and the potential for building damage would be eliminated with the incorporation of **Mitigation Measure NOI-1** as detailed below.

For the DDC construction activities, the proposed drops could occur as close as 50 feet from the nearest structures. The nearest off-site industrial building to the DDC construction activities would experience vibration levels of up to 1.02 in/sec PPV, which would potentially exceed the FTA threshold of 0.5 in/sec PPV for building damage. At a distance of approximately 78 feet from DDC construction activities, vibration levels would be 0.49 in/sec PPV and would be below the FTA criteria of 0.5 in/sec PPV. While construction could result in vibration damage, impacts would be reduced to less than significant, and the potential for building damage would be eliminated with the incorporation of **Mitigation Measure NOI-1.**

Threshold NOI-3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Impact NOI-3: Less than Significant Impact. The closest airport to the project site is Joint Forces Training Base (JFTB) Los Alamitos, which is located approximately 0.4 mile to the southwest. The noise contour boundaries of JFTB show that the project site is located outside of Noise Impact Zone 2 (60 dB CNEL or greater), therefore, this impact would be less than significant. No mitigation is required.

4.6.7 Level of Significance Prior to Mitigation

Prior to the implementation of mitigation measures, the project could potentially result in the generation of ground-borne vibration and ground-borne noise during construction activities. The project would result in less than significant impacts related to temporary construction and operational noise impacts, and to the exposure of people to excessive noise levels within the vicinity of an airport or private airstrip.

4.6.8 Regulatory Compliance Measures and Mitigation Measures

4.6.8.1 Regulatory Compliance Measures

The following regulatory compliance measure is applicable to the proposed project and is considered in the analysis of potential impacts related to noise. In addition to compliance with the construction hours specified in the City's Municipal Code, the following standard condition would reduce construction noise to the extent feasible and reasonable:

Regulatory Compliance Measure NOI-1 **Construction Noise and Vibration**. Prior to issuance of grading permits, the City of Cypress (City) Director of Community Development Department, or designee, shall

verify that grading and construction plans include the following requirements:

- Ensure that the greatest distance between noise sources and sensitive receptors during construction activities has been achieved.
- Construction equipment, fixed or mobile, shall be equipped with properly operating and maintained noise mufflers consistent with manufacturers' standards.
- Construction staging areas shall be located away from off-site sensitive uses during the later phases of project development.
- The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from noise-sensitive receptors nearest the project site whenever feasible.
- The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators where feasible.
- A sign, legible at a distance of 50 feet, shall also be posted at the construction site perimeter. All notices and the signs shall indicate the dates and duration of ground improvement activities, as well as provide a telephone number for the "noise disturbance coordinator."
- A "noise disturbance coordinator" shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures to reduce noise levels. All signs posted at the construction site shall list the telephone number for the disturbance coordinator.

4.6.8.2 Mitigation Measures

The following mitigation measure is applicable to the proposed project.

Mitigation Measure NOI-1

Construction Vibration Monitoring Plan. Due to the close proximity to surrounding structures, the City of Cypress (City) Director of Community Development, or designee, shall verify prior to issuance of demolition or grading permits, that the approved plans require that the construction contractor implement the following mitigation measures during project construction activities in the event that the use of heavy equipment is necessary within 25 feet (ft) of surrounding structures or when deep dynamic compaction (DDC) construction activity takes places within 80 ft of surrounding structures:

- Notification to nearby businesses detailing the schedule and duration of DDC activities.

- Structures that are located within 25 ft of heavy construction activities and within 80 ft of DDC construction activity that have the potential to be affected by ground-borne vibration shall be identified. This task shall be conducted by a qualified structural engineer as approved by the City's Director of Community Development, or designee.

- The Applicant's construction contractor shall develop a vibration monitoring and construction contingency plan for approval by the City's Director of Community Development, or designee, to identify appropriate locations in the vicinity of nearby structures where monitoring would be conducted; set up a vibration monitoring schedule; define structure-specific maximum vibration limits based on building inspections; contain provisions to conduct photo, elevation, and crack surveys to document before and after construction conditions at those structures. The plan shall identify construction contingencies that would be implemented if vibration levels approach the established vibration limits at a particular location. Potential contingencies may include one or more of the following:

    - Lowering the height of the compaction weight;

    - Using a lighter compaction weight; or

    - Any other alternate method that is safe and appropriate, as determined by the project

geotechnical consultant, in consultation with the City's Director of Community Development (such as utilizing geopier stabilization instead of DDC).[80]

- At a minimum, vibration during initial site preparation activities at the locations described above shall be monitored. The monitoring results may indicate the need for more or less intensive measurements.

- When vibration levels approach the applicable limits established in the vibration monitoring and construction contingency plan, construction shall be suspended, and the appropriate mitigation measures identified in the construction contingency plan shall be implemented to reduce vibration levels below thresholds.

4.6.9 Level of Significance after Mitigation

With the implementation of mitigation measures, all impacts would be reduced to a less than significant level.

4.6.10 Cumulative Impacts

Less Than Significant Impact. As defined in the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and reasonably foreseeable probable future projects. A cumulative noise or vibration impact would occur if multiple sources of noise and vibration combine to create impacts in close proximity to a sensitive receptor. Therefore, the cumulative area for noise and vibration impacts is the project site and any sensitive receptors in the immediately surrounding area.

Construction Noise. Construction activities associated with the proposed project and other construction projects in the area may overlap, resulting in construction noise in the area. However, construction noise impacts primarily affect the areas immediately adjacent to each construction site. Construction noise for the proposed project was determined to be less than significant. Cumulative development in the vicinity of the project site could result in elevated construction noise levels at sensitive receptors in the area surrounding the project site. However, each project would be required to comply with the applicable city's Municipal Code limitations on construction. Therefore, cumulative construction noise impacts would be less than significant.

Operational Traffic Source Noise Impacts. According to the USEPA, cumulative noise impacts represent the combined and incremental effects of human activities that accumulate over time. While the incremental impacts may be insignificant by themselves, the combined effect may result

[80] Utilizing a geopier stabilization system method is estimated to result in vibration levels of 0.22 at approximately 15 feet, which would ensure that vibration from construction within 10 feet remains lower than the threshold of 0.5 in/sec PPV for building damage.

in a significant impact. Conversely, although there may be a significant noise increase due to the proposed project in combination with other related projects (combined effects), it must also be demonstrated that the project has an incremental effect. In other words, a significant portion of the noise increase must be due to the proposed project.

As stated in Section 4.7, Transportation, the results of the Future Year (2025) Condition (Opening Year With Project) peak-hour level of service (LOS) analysis for the study area intersections show that all study area intersections are forecasted to operate at satisfactory LOS during both peak hours. As previously shown in **Table 4.6.8** above, project-related traffic for the Opening Year With Project would result in noise level increases between 0.0 to 0.8 dBA CNEL along roadway segments in the vicinity of the project site. These levels are below the significance criteria for off-site traffic noise. Therefore, none of the roadway segments in the vicinity of the project site would experience a substantial noise level increase greater than the applicable noise thresholds, and the proposed project would not have a cumulatively significant traffic noise impact.

Operational Stationary Source Noise. Long-term stationary noise sources associated with the development at the proposed project, combined with other cumulative projects, could cause local noise level increases. Noise levels associated with the proposed project and related projects together could result in higher noise levels than considered separately. As previously described, on-site noise sources associated with the proposed project would not exceed any applicable noise standards. Additionally, each of the related projects would be required to comply with the City's noise level standards and include mitigation measures if standards are exceeded. Therefore, cumulative noise impacts from stationary noise sources would be less than significant.

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4.7 TRANSPORTATION

This section analyzes the potential transportation impacts associated with the 5655 Plaza Drive Project (proposed project). The analysis contained in this section is based on the *Traffic Impact Analysis* prepared by Urban Crossroads, dated November 21, 2023, the Traffic Memorandum dated February 20, 2024, and the *Vehicle Miles Traveled (VMT) Analysis*, prepared by LSA Associates, Inc., dated December 15, 2023. Both documents are provided in **Appendix E** to this Draft EIR.

4.7.1 Scoping Process

The City received three comment letters during the public review period for the NOP. For copies of the NOP comment letters, refer to **Appendix A** of this Draft EIR. Two comment letters included comments related to noise.

The letter from the City of Los Alamitos received on June 5, 2024, requests that the Draft EIR outline the existing truck routes, the project's impact along existing truck routes, and any impacts related to the modification of truck routes. Additionally, the letter suggested the Draft EIR provide a traffic and/or access analysis to evaluate daily truck trips and their distribution and influence on Los Alamitos roadways. Specifically, on I-605 and I-405.

The Letter from Warland Investments Company and Affiliated Entities received on June 5, 2024, suggest that the proposed project has a foreseeable potential use as a logistics center, stating that logistics centers can create more congestion on local streets when compared to typical warehouse projects. Additionally, in a previous letter dated March 7, 2024, which was included as an attachment in the June 5, 2024, letter, Warland states their concerns about the Truck Distribution Map in the Traffic Analysis for the proposed project, highlighting the analysis's failure to account for truck traffic from the entire Goodman Commerce Center (the 5665 Plaza Drive Project and The Goodmand Commerce Center Project), the incorrect assumption that 100 percent of truck traffic will exit via Driveway 1, and the omission of detailed projections for truck routes, especially regarding the impact on nearby residential areas. Additionally, the letter argues that the Traffic Analysis inaccurately estimates daily truck trips by solely evaluating the 5665 Redevelopment, rather than considering the entire Goodman Commerce Center as a logistics hub, leading to a significant underestimation of truck traffic impacts.

4.7.2 Regulatory Setting

The applicable federal, State, regional, and local regulatory framework is discussed below.

4.7.2.1 Federal Regulations

There are no federal regulations or policies pertaining to transportation that are applicable to the proposed project.

4.7.2.2 State Regulations

Senate Bill 743. SB 73 was signed into law by Governor Jerry Brown on September 27, 2013, initiating a change to the State CEQA Guidelines on the methodology for analyzing transportation impacts in CEQA documents. SB 743 directed the California OPR to establish new CEQA guidance to replace analytical approaches focused on automobile vehicle delay at intersections and traffic

congestion along roadway segments using the level of service (LOS) method from CEQA transportation analysis. As of July 1, 2020, lead agencies must use the vehicle miles traveled (VMT) metric instead of LOS to analyze transportation impacts in CEQA documents as the basis for determining significant transportation impacts in the State. VMT measures the vehicle miles travelled that would result from implementation of a project.

State CEQA Guidelines Section 15064.3, Subdivision (b). In January 2018, the State of California OPR submitted a proposal to the California Natural Resources Agency for comprehensive updates to the State CEQA Guidelines. The submittal included proposed updates related to the analysis of greenhouse gas (GHG) emissions, energy, transportation impacts pursuant to SB 743, and wildfires, as well as revisions to State CEQA Guidelines Section 15126.2(a) in response to the California Supreme Court's decision in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal. 4th 369. On December 28, 2018, the updated State CEQA Guidelines went into effect.

Section 15064.3 of the updated State CEQA Guidelines codifies that project-related transportation impacts are typically best measured by evaluating the project's VMT. Specifically, subdivision (b) focuses on specific criteria related to transportation analysis and is divided into four subdivisions: (1) land use projects, (2) transportation projects, (3), qualitative analysis, and (4) methodology. Subdivision (b)(1) provides guidance on determining the significance of transportation impacts of land use projects using VMT; projects located within 0.5 mile of high-quality transit should be considered to have a less than significant impact. Subdivision (b)(2) addresses VMT associated with transportation projects and states that projects that reduce VMT, such as pedestrian, bicycle, and transit projects, should be presumed to have a less than significant impact. Subdivision (b)(3) acknowledges that Lead Agencies may not be able to quantitatively estimate VMT for every project type; in these cases, a qualitative analysis may be used. Subdivision (b)(4) stipulates that Lead Agencies have the discretion to formulate a methodology that would appropriately analyze a project's VMT.

4.7.2.3 Regional Regulations

Orange County Congestion Management Program. Established in 1991, the Orange County Transportation Authority (OCTA) consolidated seven separate agencies into a single multimodal transportation agency. State law requires that a Congestion Management Program (CMP) be developed, adopted, and updated biennially for every county that includes an urbanized area, and requires that it include every city and the county government within that county. As the Congestion Management Agency for Orange County, OCTA is responsible for implementing the Orange County CMP. OCTA adopted the CMP in 1991 to reduce traffic congestion and to provide a mechanism for coordinating land use and development decisions in Orange County. Compliance with the CMP requirements ensures a city's eligibility to compete for State gas tax funds for local transportation projects.

County of Orange Master Plan of Arterial Highways. The County of Orange Master Plan of Arterial Highways (MPAH) defines the arterial system in the Circulation Element of the Orange County General Plan. This system, which is the planned future roadway system in the County, incorporates several specific arterial roadway classifications. The Circulation Elements of cities within the County

are expected to be consistent with the MPAH in order to be eligible for funding improvements on MPAH roadways.

County of Orange Measure M Growth Management Program. Measure M, approved in 1990 by County voters, authorized the collection of a one-half percent sales tax to fund needed transportation improvements. In order to be eligible to receive funds, cities must satisfy a number of requirements, including adopting a Circulation Element that is consistent with the County's MPAH, adopting a Growth Management Plan, and adopting a seven-year capital improvement program to include transportation projects funded by Measure M.

4.7.2.4 Local Regulations

City of Cypress General Plan. The City of Cypress General Plan[81] is the primary source of long-range planning and policy direction that guides growth and preserves quality of life within the community. The General Plan contains goals, policies, and plans that are intended to guide land use and development decisions. The General Plan, last comprehensively updated in 2001, includes a Land Use Map and the following eight elements, or chapters, which together fulfill the State requirements for a General Plan:

- Land Use Element
- Housing Element
- Circulation Element
- Conservation/Open Space/Recreation Element (satisfies the State's Conservation and Open Space Element requirements)
- Safety Element
- Noise Element
- Air Quality Element (optional element not required by State law)
- Growth Management Element (optional element not required by State law)

City of Cypress General Plan Circulation Element. The Circulation Element[82] is a general guide for the planning, development, and enhancement of the City's public roadways, based on existing and anticipated land uses. Most transportation-related plans and programs are established with the goal of maintaining acceptable operating LOS on the City's transportation system. The City of Cypress has adopted LOS D or better as the desired citywide operating standard for most City streets. However, given the influence of regional traffic on Valley View Street, Lincoln Avenue, and Katella Avenue, which are beyond the control of the City of Cypress, LOS E or better has been adopted as the minimum operating Level of Service for street segments and intersections on these arterials. The Circulation Element goals and policies define the City's vision for a balanced, efficient circulation system which incorporate many modes of travel and which allows for the safe movement of people

81 City of Cypress. 2001a. *City of Cypress General Plan*.
82 City of Cypress. 2001b. *City of Cypress General Plan* Circulation Element.

and goods in and around Cypress. Based on the Circulation Element, the local and regional street network is built out in Cypress. Similarly, the City's bikeway system is generally built out, with the exception of a planned bike lane on Walker Street south of Cerritos Avenue. This proposed bike lane would connect to the existing bike lane on Walker Street north of Cerritos Avenue.

4.7.3 Existing Environmental Setting

4.7.3.1 Existing Circulation System

The project site is generally bounded by light industrial uses to the north and the Goodman Commerce Center Project (approved in April 2023) to the east, and Plaza Drive to the south. Access to the project site is provided by two existing driveways along Plaza Drive; the proposed project would relocate the driveway locations. The new westernmost driveway would be the primary truck access point and path to the truck loading docks on the proposed building's west side, while the eastern driveway would be a shared driveway with the parcel to the east.

Key roadways in the vicinity of the project site include:

- **Plaza Drive** is an east-west two- lane divided roadway located directly south of the project site and is not a classified General Plan roadway. ~~Sidewalks are not provided along Plaza Drive~~ There are no sidewalks along Plaza Drive east of the project site. However, sidewalks are proposed along 5775 and 5885 Plaza Drive on the north side of Plaza Drive**.** No on-street parking is permitted.

- **Douglas Drive** is a north-south two-lane divided roadway located south of the project site and connects into Katella Avenue via a signalized intersection and is not a classified General Plan roadway. Sidewalks are provided on the west side along the roadway. ~~However, sidewalks are proposed along 5775 and 5885 on the north side of Douglas Drive~~ No on-street parking is permitted.

- **Katella Avenue** is an east-west six-lane divided roadway located south of the project site. According to the City of Cypress General Plan Circulation Element (2001), Katella Avenue is designated as a Major Arterial. Katella Avenue is designated on the Orange County CMP as a CMP facility. The posted speed limit is 40 to 45 miles per hour (mph). Sidewalks are provided on both sides of the street. On-street parking is permitted in select locations.

- **Valley View Street** is a north-south six-lane divided roadway located west of the project site. Valley View Street designated as a Major Arterial in the City of Cypress General Plan Circulation Element. Valley View Street is designated in the Orange County CMP as a CMP facility. The posted speed limit is 45 mph. Sidewalks are provided on both sides of the street. On-street parking is not permitted.

- **Walker Street** is a north-south, four-to-five-lane, ~~un~~divided roadway. According to the City of Cypress General Plan Circulation Element (2001), Walker Street is classified as a Secondary Arterial. The average posted speed limit is 40 mph. Sidewalks are provided on both sides of the street. On-street parking is not permitted.

- **Cerritos Avenue** is a four-to-five-lane, divided roadway. According to the City of Cypress General Plan (2001), Cerritos Avenue is a Primary Arterial. The posted speed limit is 45 mph. Sidewalks are provided on both sides of the street, and on-street (Class II) bicycle lanes are provided on both sides between Walker Street and Denni Street. On-street parking is permitted in select locations.

- **Ball Road** is a four-lane, divided roadway and it is classified as a Primary Arterial according to the City of Cypress General Plan (2001). The posted speed limit is 45 mph. On-street (Class II) bicycle lanes and sidewalks are provided on both sides of the street. On-street parking is not permitted.

- **Moody Street** is a north-south, four-lane, divided roadway. According to the City's General Plan Circulation Element (2001), Moody Street is classified as a Primary Arterial. The posted speed limit is 40 mph. On-street bicycle lanes (Class II) and sidewalks are provided on both sides of the street. On-street parking is generally not permitted.

- **Orangewood Avenue** is a four-lane, undivided roadway. According to the City of Cypress General Plan (2001), Orangewood Avenue is a Secondary Arterial. The posted speed limit is 35 to 40 mph. Sidewalks are provided on both sides of the street. On-street parking is not permitted.

Pedestrian Circulation. Sidewalks currently exist on both sides of Katella Avenue, Valley View Street, in the vicinity of the project site. Additionally, there is a 10-foot sidewalk along the west side of Douglas Drive between the proposed project down to Katella Avenue to the south. There are pedestrian crosswalks at all signalized intersections in the vicinity of the project site. These facilities provide for pedestrian circulation between the project site and the surrounding areas.

Bicycle Circulation. Katella Avenue and Valley View Street currently accommodate off-street bike paths; there are no on-street bike lanes provided by Katella Avenue. On-street (Class II) bicycle lanes are provided on both sides of Cerritos Avenue (between Walker Street and Denni Street) and Bloomfield Street. There is a Class I bicycle lane on the south side of Cerritos Avenue between Walker Street and Denni Street. On-street bicycle lanes (Class II) and sidewalks are provided on both sides of Moody Street.

Transit Facilities. Transit facilities would be provided by the OCTA along Katella Avenue and Valley View Street. OCTA Route 50 runs along Katella Avenue and currently has existing bus stops just east of Douglas Drive and west of Valley View Street. Route 50 provides transportation to/from the Cities of Orange and Long Beach via Katella Avenue. OCTA Route 123 runs along Valley View Street with existing bus stops north of Plaza. OCTA Route 123 provides transportation to/from Buena Park and Sunset Beach via Valley View Street. OCTA buses stop approximately every hour (60 minutes) during the morning and evening commute hours (operational between 4:00 AM and 10:00 PM).

4.7.3.2 Existing Traffic Volumes and LOS Analysis

The intersection LOS analysis is based on the traffic volumes observed during the peak hour conditions using traffic count data collected in 2022 when local schools were in session and operating on normal bell schedules. The following peak hours were selected for analysis:

- Weekday AM Peak Hour (peak hour between 7:00 AM and 9:00 AM)
- Weekday PM Peak Hour (peak hour between 4:00 PM and 6:00 PM)

There were no observations made in the field that would indicate atypical traffic conditions on the count dates, such as construction activity or detour routes and near-by schools were in session and operating on normal schedules. The 2022 peak hour volumes have been adjusted to increase turning movements into low occupancy office uses in the surrounding area by 30 percent. The volumes were then increased by an additional two percent for all movements in order to adjust the 2022 traffic counts to 2023. A comparison of the PM peak hour and daily traffic volumes of various roadway segments within the study area indicated that the peak-to-daily relationship is approximately 8.9 percent. As such, the above equation utilizing a factor of 11.3 estimates the ADT volumes on the study area roadway segments assuming a peak-to-daily relationship of approximately 8.9 percent (i.e., 1/0.089 = 11.3) and was assumed to sufficiently estimate ADT volumes for planning-level analyses.

Volumes reported on the exhibits are expressed in passenger car equivalent (PCE) volumes as the intersection operations analysis utilizes PCE volumes. Note that only the intersection turning movement volumes are expressed in PCE and ADTs are presented as actual vehicles as used in other technical studies. PCEs allow the typical "real-world" mix of vehicle types to be represented as a single, standardized unit, such as the passenger car, to be used for the purposes of capacity and level of service analyses.

The intersection operations analysis results summarized on **Table 4.7.1** indicate that all existing study area intersections are currently operating at acceptable LOS during the peak hours.

Table 4.7.1: Existing Intersection Level of Service Summary (2023) Conditions

Intersection		Control	Peak Hour	Existing	
				ICU/Delay	LOS
1	Douglas Drive /Warland Drive and Katella Avenue	Signal (ICU)	AM	0.44	A
			PM	0.52	A
		Signal (Delay)	AM	5.4	A
			PM	8.2	A
2	Douglas Drive /Driveway 2 and Driveway 1/Plaza Drive	AWS (ICU)	AM	N/A	N/A
			PM	N/A	N/A
		AWS (Delay)	AM	7.2	A
			PM	7.7	A
5	Existing Driveway/McDonnell Dive and Plaza Drive	CSS (ICU)	AM	N/A	N/A
			PM	N/A	N/A
		CSS (Delay)	AM	9.2	A
			PM	10.8	B
7	Knott Avenue/Katella Avenue	Signal (ICU)	AM	0.56	A
			PM	0.79	C
8	Western Avenue/Katella Avenue	Signal (Delay)	AM	15.4	B
			PM	35.7	D

Source: *Traffic Impact Analysis* (Urban Crossroads, November 2023).
Note: Delay is reported in seconds.
CSS = cross-street stop
ICU = Intersection Capacity Utilization
LOS = level of service
N/A = not applicable

4.7.3.3 Existing Traffic Signal Warrant Analysis

Traffic signal warrants for existing traffic conditions are based on existing peak hour intersection turning volumes. For existing traffic conditions, there are no study area intersections that currently warrant a traffic signal based on the peak hour traffic volumes.

4.7.3.4 Existing VMT

Regional HBW VMT for Orange County was calculated for the base (2016) and future (2045) scenarios based on OCTAM output files. The socio-economic data and VMT per employee for the region was calculated as a collection of TAZs (all TAZs located in Orange County) rather than a single TAZ. Baseline (2020) HBW VMT for Orange County was developed by interpolating (using linear interpolation) between base (2016) and future (2045) VMT. Orange County baseline (2020) VMT per employee is summarized in **Table 4.7.2.**

Table 4.7.2: Baseline 2020 Orange County VMT per Employee

Description	Orange County[1]
Employment	1,710,147
VMT	4 1,174,971
VMT/Employee	24.~~8~~1

Source: *VMT Assessment* (LSA December 2023).
[1] Obtained from Final Draft Guidelines For Evaluating Vehicle Miles Traveled Under CEQA for the County of Orange, September 17,2020.
OCTAM = Orange County Transportation Analysis Model
VMT = vehicle miles traveled

4.7.4 Methodology

As discussed in Section 4.7.2, Regulatory Setting, recent changes to the State CEQA Guidelines eliminated the requirement for LOS analysis in CEQA documents in favor of the VMT metric. However, the City of Cypress' General Plan Circulation Element includes a detailed LOS analysis of the City's existing operating conditions and sets LOS capacity/operational standards for each class of roadway within the City. Therefore, an analysis of LOS is included in this section in order to achieve consistency with the City's General Plan.

The Traffic Impact Analysis (TIA) (see **Appendix E**) prepared for the proposed project is consistent with the objectives and requirements of the City of Cypress, and the Orange County CMP (County of

Orange 2023),[83] as well as applicable provisions of CEQA, including disclosure of project impacts in both existing and cumulative horizon years.

The scope of work for the TIA, including the project study area, was reviewed and approved by the City's Traffic Engineer prior to the preparation of the TIA. Study area locations were selected in consultation with City staff. The study area analyzed in the project TIA includes the following four intersections (six intersections in Cypress, one intersection in both Cypress and Stanton, and one intersection in Stanton):

1. Douglas Drive/Warland Drive and Katella Avenue (signalized) (Cypress)
2. Douglas Drive/Driveway 2 and Driveway 1/Plaza Drive (unsignalized (Cypress)
3. Existing Driveway/McDonnell Drive and Plaza Drive (unsignalized) (Cypress)
4. Valley View Street and Plaza Drive/Chip Avenue (signalized) (Cypress)

4.7.4.1 Intersection Level of Service Methodologies

In accordance with the requirements of the City of Cypress, and the Orange County CMP, signalized intersection operation is analyzed using the Intersection Capacity Utilization (ICU) methodology. The ICU methodology compares the volume-to-capacity (v/c) ratios of conflicting turn movements at an intersection, sums up these critical conflicting v/c ratios for each intersection approach, and determines the overall ICU. Lane capacities of 1,600 vehicles per hour of green time is assumed for the ICU calculations. The Traffix software is utilized to evaluate the signalized intersections based on the ICU methodology. The resulting ICU is expressed in terms of level of service (LOS), where LOS A represents free-flow operation and LOS F represents over capacity operation.

The relationship between LOS and the ICU value (i.e., v/c ratio) is as follows.

Level of Service	Volume-to-Capacity (ICU Methodology)
A	≤0.60
B	>0.60 and ≤0.70
C	>0.70 and ≤0.80
D	>0.80 and ≤0.90
E	>0.90 and ≤1.00
F	>1.00

Source: 2019 Orange County Congestion Management Program (CMP)
ICU = intersection capacity utilization

In addition to the ICU methodology of calculating signalized intersection LOS, the *Highway Capacity Manual* (HCM), 6th Edition (Transportation Research Board 2017) methodology is used to determine the LOS of the unsignalized intersections. The Synchro (Version 10) is utilized for evaluation of the unsignalized study area intersections based on the HCM 6th Edition methodology. The following tables, **Table 4.7.3** shows the relationship of delay to LOS for unsignalized and **Table 4.74** shows the signalized intersections.

[83] Orange County Transportation Authority (OCTA). 2023. *Orange County Congestion Management Program Report. November.* Website: https://www.octa.net/pdf/2023CMP.pdf?n=202311 (accessed May 24, 2024).

Table 4.7.3: Unsignalized Intersection LOS Thresholds

Description	Level of Service	Intersection Delay (seconds) per Vehicle (HCM Methodology)
		Unsignalized
Little or no delays	A	0 to 10.00
Short traffic delays	B	10.01 to 15.00
Average traffic delays.	C	15.01 to 25.00
Long traffic delays	D	25.01 to 35.00
Very long traffic delays.	E	35.01 to 50.00
Extreme traffic delays with intersection capacity exceeded.	F	>50.0

Source: *Highway Capacity Manual* 6th Edition (Transportation Research Board 2017).

Table 4.7.4: Signalized Intersection LOS Thresholds

Description	Level of Service	Intersection Delay (seconds) per Vehicle (HCM Methodology)
		Unsignalized
Operations with very low delay occurring with favorable progression and/or short cycle length.	A	0 to 10.00
Operations with low delay occurring with good progression and/or short cycle lengths.	B	10.01 to 20.00
Operations with average delays resulting from fair progression and/or longer cycle lengths. Individual cycle failures begin to appear.	C	20.01 to 35.00
Operations with longer delays due to a combination of unfavorable progression, long cycle lengths, or high V/C ratios. Many vehicles stop and individual cycle failures are noticeable.	D	35.01 to 55.00
Operations with high delay values indicating poor progression, long cycle lengths, and high V/C ratios. Individual cycle failures are frequent occurrences. This is considered to be the limit of acceptable delay.	E	55.01 to 80.00
Operation with delays unacceptable to most drivers occurring due to over saturation, poor progression, or very long cycle lengths.	F	80.01 and up

Source: *Highway Capacity Manual* 6th Edition (Transportation Research Board 2017).

4.7.4.2 Traffic Signal Warrant Analysis Methodology

The term "signal warrants" refers to the list of established criteria used by Caltrans and other public agencies to quantitatively justify or ascertain the potential need for installation of a traffic signal at an otherwise unsignalized intersection. An evaluation of the signal warrant criteria presented in the Caltrans 2014 California Manual on Uniform Traffic Control Devices (CAMUTCD) (revised in 2023) is conducted for the unsignalized study area intersections.

The signal warrant criteria for existing study area intersections are based upon several factors, including volume of vehicular and pedestrian traffic, frequency of accidents, and location of school areas. The CA MUTCD indicates that the installation of a traffic signal should be considered if one or

more of the signal warrants are met. Specifically, this TIA utilizes the Peak Hour Volume-based Warrant 3 as the appropriate representative traffic signal warrant analysis for existing traffic conditions and for all future analysis scenarios for existing unsignalized intersections. Warrant 3 is appropriate to use for this TIA because it provides specialized warrant criteria for intersections with rural characteristics. For the purposes of this study, the speed limit was the basis for determining whether Urban or Rural warrants were used for a given intersection. Rural warrants have been used where posted speed limits on the major roadways with unsignalized intersections that are over 40 miles per hour while urban warrants have been used where posted speeds are 40 miles per hour or below.

It is important to note that a signal warrant defines the minimum condition under which the installation of a traffic signal might be warranted. Meeting this threshold condition does not require that a traffic control signal be installed at a particular location, but rather, that other traffic factors and conditions be evaluated in order to determine whether the signal is truly justified. It should also be noted that signal warrants do not necessarily correlate with LOS. An intersection may satisfy a signal warrant condition and operate at or above acceptable LOS or operate below acceptable LOS and not meet a signal warrant.

4.7.4.3 Vehicle Miles Traveled Analysis

On December 28, 2018, the California Office of Administrative Law cleared the revised CEQA Guidelines for use. Among the changes to the State CEQA Guidelines was the removal of vehicle delay and LOS from consideration under CEQA. With the adopted guidelines, transportation impacts are to be evaluated based on a project's effect on VMT.

The City is yet to adopt the SB 743 guidelines; therefore, the VMT analysis has been based upon the methodology and significant threshold criteria identified in the OPR's Technical Advisory, dated December 2018.

The project includes industrial land uses only. The OPR Technical Advisory does not specifically recommend any VMT metric or threshold for industrial uses. However, since the land use is non-residential and could not be classified as retail land use, VMT-per-employee metric was used for purposes of evaluating the project.

Based on the OPR Technical Advisory recommendations, the threshold for determining VMT impacts has been considered as 15 percent below the region's baseline VMT per capita for residential projects, and 15 percent below the region's baseline VMT per employee for non-residential/non-retail projects.

As per the OPR TA, a region should be defined based on where the majority of the project trips are contained. As such, the majority of project trips are estimated to start or end within the region defined for VMT analysis purposes. Typically, it is the county boundary within which a majority of those trips are contained. While the city boundary can also be considered as the region for residential uses, given that the project land use is non-residential and based on the understanding of the local trip patterns, it was determined that the entire Orange County would be the most appropriate region for the project for purposes of VMT analysis. As such, as recommended in the

OPR Guidelines, if the project VMT per employee is greater than 85 percent of the existing countywide VMT per employee, the project constitutes a significant VMT impact.

4.7.5 Thresholds of Significance

The thresholds for transportation impacts used in this analysis are consistent with Appendix G of the State CEQA Guidelines and the City's Initial Study/Environmental Checklist. The proposed project may be deemed to have a significant impact with respect to transportation if it would:

Threshold TRA-1: Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities

Threshold TRA-2: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)

Threshold TRA-3: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)

Threshold TRA-4: Result in inadequate emergency access

4.7.6 Project Impacts

Threshold TRA-1: **Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**

Impact TRA-1: Less Than Significant Impact. In order to assess the impact of the proposed project on the surrounding circulation system, Urban Crossroads calculated the project-related trips using trip rates from the Institute of Transportation Engineers' (ITE) *Trip Generation Manual*, 11th Edition (2021) High-Cube Cold Storage (Land Use Code 157) **Table 4.7.5**, below, presents the trip generation comparison between the existing and proposed use.

Table 4.7.5: Proposed Project Trip Generation Comparison

Land Use	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Proposed Project Trip Generation							
Passenger Cars	262	15	1	16	4	14	18
Total Truck Trips (PCE)	342	4	9	13	7	7	14
Total Trips (PCE)	**604**	**19**	**10**	**29**	**11**	**21**	**32**
Existing Use: General Office Trip Generation							
Passenger Cars	408	50	7	57	9	45	54
Total Truck Trips (PCE)	0	0	0	0	0	0	0
Total Trips (PCE)	**408**	**50**	**7**	**57**	**9**	**45**	**54**
Net Trips (Proposed Project - Existing)	**196**	**-31**	**-3**	**-28**	**2**	**-24**	**-22**

[1] Trip rates from the Institute of Transportation Engineers' (ITE) *Trip Generation* Manual, 11th Edition (2021).

As **Table 4.7.5** shows, the proposed project is anticipated to generate a net increase of 196 two-way trips per day with a net reduction of 28 a.m. peak hour trips and a net reduction of 22 p.m. peak hour trips (in passenger car equivalents [PCE]).

Since the proposed project is likely to generate fewer than 50 net new peak-hour trips and fewer than 25 net new peak-hour trips at any single intersection, the implementation of the proposed project is not anticipated to result in any operational or LOS deficiencies; therefore, no further study is necessary.

The City's General Plan provides goals and policies to implement a balanced, functional, and efficient circulation system, and incorporate alternative modes of travel which allows for the safe movement of people and goods. General Plan policies CIR-2.5 and CIR-2.8 encourage the development of adequate sidewalks, particularly to provide connections to surrounding alternative modes of transportation. The project site currently provides sidewalks along Plaza Drive and Walker Drive allowing for pedestrian connections to nearby transit. Therefore, the proposed project would not inhibit the use of alternative transportation in the area and would not conflict with circulation policies in the General Plan. Impacts would be less than significant, and no mitigation is required.

Threshold TRA-2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Impact TRA-2: Less Than Significant Impact. The City requires that all CEQA-related VMT studies be conducted consistent with the State of California Governor's OPR Technical Advisory, and that screening criteria and impact thresholds are determined on a case-by-case basis in accordance with Caltrans' February 2020 VMT-Focused Transportation Impact Study Guide (TISG).

California Public Resources Code Section 15064.3(b)(4) states (in part) that:

> "A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household, or in any other measure."

Additionally, the OPR Technical Advisory recommends VMT screening thresholds for smaller projects. The footnote on page 12 of the OPR Technical Advisory states the following:

> "Screening Threshold for Small Projects
>
> Many local agencies have developed screening thresholds to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact."

The OPR Technical Advisory recommends that a project generating 110 average daily trips (ADT) or less be screened out of a VMT analysis due to the presumption of a less than significant impact. This

recommendation is not based on any analysis of GHG reduction but is instead based on the potential trip generation of a project that would be categorically exempt under CEQA.

As mentioned before, the proposed project includes the demolition of 150,626 square feet of office space and the construction of a new light industrial building that would be approximately 191,394 square feet in size. The proposed project does not qualify for any of the screening criteria, including the screening threshold for small projects because, as noted in **Table 4.7.5**, the proposed project would generate a net increase of 196 ADT and a total of 604 ADT. Therefore, a detailed VMT analysis was prepared.

The Orange County Transportation Analysis Model (OCTAM) was used to determine the VMT impact of the proposed project. OCTAM is a socioeconomic data-based model, hence project land uses were converted into model employment using land use-to-employment conversion factors. The ITE *Trip Generation Manual*, 11th Edition, was used to develop the conversion factors. The ITE *Trip Generation Manual* includes trip rates for different types of land uses by multiple unit types that were used to develop land use-to-employee conversion factors (i.e., employees per thousand square feet). The socioeconomic data (i.e., total number of jobs) for the proposed project were added to the project transportation analysis zone (TAZ) for the model run.

A baseline model run was conducted using the adjusted socioeconomic data for the project and project location TAZs. No circulation/network modifications were identified for inclusion in the model network. The outputs from this updated model run were used to calculate the VMT per employee for the project.

The VMT per employee metric is used to evaluate the project's proposed land use. The proposed project would constitute a significant impact if the project VMT metric is greater than 85 percent of the regional existing VMT metric. Hence the proposed project would constitute a significant impact if the project VMT per employee is greater than 85 percent of the Orange County VMT per employee (threshold). As shown in **Table 4.7.6**, the project's VMT per employee would be lower than the Orange County regional threshold; therefore, the proposed project would have a less than significant impact related to VMT, and no mitigation measures are required.

Table 4.7.6: Baseline Project and Regional VMT Per Employee Comparison

Baseline	5665 Plaza Drive (Project)	Entire Orange County[1]	Threshold[2]	% Difference	Significant Impact?
VMT per employee	20.3	24.1	20.5	-1%	No

Source: Compiled by LSA (2023).

[1] Obtained from the *Final Draft Guidelines For Evaluating Vehicle Miles Traveled Under CEQA for the County of Orange*, September 17, 2020.

[2] 85% of the regional average (24.1*0.85=20.5) baseline. Base year of the OCTAM model is 2016.

OCTAM = Orange County Transportation Analysis Model

VMT = vehicle miles traveled

Threshold TRA-3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impact TRA-3: Less Than Significant with Mitigation Incorporated. Vehicular traffic to and from the project site would utilize the existing network of regional and local roadways that serve the project area. Access to the project site would be provided via two driveways at Plaza Drive and Douglas Drive. The design of the proposed project, including the internal roadways, ingress, egress, and other streetscape changes, would be subject to review by the City's Department of Public Works. The proposed project would include the relocation of the existing driveways. The new westernmost driveway would be the primary truck access point and path to the truck loading docks on the proposed building's west side. The eastern driveway would be a shared driveway with the parcel to the east.

Traffic from the proposed project site traveling to and from Valley View Street via Plaza Drive would head northbound on Valley View Street. Any southbound traffic on Valley View Street or eastbound traffic on Katella Avenue would originate from the intersection of Douglas Drive/Warland Drive. Trucks traveling from the proposed project building would utilize Plaza Drive to Valley View Street and Douglas Drive to Katella Avenue. A portion of the truck trips would continue east on Katella Avenue while the remainder of trucks would travel south on Valley View Street, consistent with the City's approved truck routes. The proposed project would contribute fewer than 50 peak hour trips at the intersection of Valley View and Katella Avenue that would fall below the City's threshold for analysis.[84] It is anticipated that Driveway 1 (on Douglas Drive) and Driveway 2 (on Plaza Drive) would be utilized by heavy trucks to access the project site. Driveway 1 is anticipated to be able to accommodate the ingress and egress of heavy trucks as currently designed, providing access to and from the east on Plaza Drive and south on Douglas Drive. Driveway 1 would serve as the primary driveway for heavy trucks accessing the project site. While Driveway 2 would accommodate the ingress and egress of heavy trucks along Plaza Drive, it is recommended that the northwest curb of Driveway 2 be modified to accommodate a 25-foot curb radius for the egress of heavy trucks. Implementation of **Mitigation Measure TRA-1**, described below, would require the installation of on-site traffic signing and striping. With implementation of **Mitigation Measure TRA-1**, the proposed project would have a less than significant impact related to transportation hazards.

Threshold TRA-4: Would the project result in inadequate emergency access?

Impact TRA-4: Less Than Significant Impact. As described above, vehicular access to the project site would be provided via two driveways at Plaza Drive and Douglas Drive. Plaza Drive would allow for adequate emergency access and all project improvements, including driveways, would be designed consistent with applicable emergency access standards. All emergency access routes to the proposed project and adjacent areas would be kept cleared and unobstructed during demolition and construction of the proposed project. No roadway closures or lane closures are anticipated as part of project construction. Therefore, the proposed project's effects on emergency access would be less than significant, and no mitigation is required.

[84] Urban Crossroads. 2023. *Goodman Commerce Center Traffic Analysis.* November 21, 2023.

4.7.7 Level of Significance Prior to Mitigation

The proposed project would have less than significant impacts related to conflicts with a program, plan, ordinance, or policy addressing the circulation system, and emergency access. However, the proposed project would have potential impacts to hazards due to geometric design features. **Mitigation Measure TRA-1** is incorporated to reduce that potential impact to a less than significant level.

Although the City has not yet adopted VMT metrics or thresholds of significant related to VMT, a VMT analysis was conducted using the recommendations and guidance of the OPR Technical Advisory to address State CEQA Guidelines Section 15064.3 subdivision (b). Based on the VMT analysis, the proposed project would have a less than significant impact.

4.7.8 Mitigation Measures

Mitigation Measure TRA-1 **Truck Access & Routing Plan and Truck Signage and Striping Plan.** The Applicant shall submit a Truck Access and Routing Plan to accommodate the circulation of trucks on site. Additionally, the Applicant shall prepare a Signage and Striping Plan, consistent with the provisions of the California Manual on Uniform Traffic Control Devices (CA MUTCD), that directs heavy trucks to the most appropriate access point. The Public Works Director of the City of Cypress, or designee, shall review and approve the Truck Access and Routing Plan and Signage and Striping Plan and confirm they have been incorporated into the project plans prior to the issuance of a building permit.

4.7.9 Regulatory Compliance Measures

No regulatory compliance measures are applicable to the proposed project.

4.7.10 Level of Significance after Mitigation

With the implementation of **Mitigation Measure TRA-1**, potentially significant impacts would be reduced below a level of significance.

4.7.11 Cumulative Impacts

Less Than Significant Impact. As defined in the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects. Potential cumulative impacts would occur if the proposed project in combination with one or more of the cumulative projects would produce significant impacts to transportation. For purposes of analyzing potential cumulative transportation impacts, the cumulative impact study area is the traffic study area outlined in the TIA. The cumulative projects that were determined to potentially affect one or more of the four study area intersections include:

- Cypress Town Center (Multifamily Housing)
- The Square (Shopping Center / Multifamily Housing / Hotel / Medical Office Building)

- Goodman Commerce Center (High-Cube Warehousing)
- 5995 Plaza Drive (General Office)

The Future Year 2025 Condition includes the existing baseline traffic conditions, without project traffic conditions, and with project traffic conditions within the study area. Any additional traffic generated by other projects not on the cumulative projects list is likely accounted for through background ambient growth factors that have been applied to the peak hour volumes at study area intersections.

Future Year peak hour traffic operations have been evaluated for the study area intersections. As indicated in **Table 4.7.7**, the Future Year traffic conditions demonstrate that the study area intersections are anticipated to continue operating at an acceptable LOS under both Future Year Without and With Project traffic conditions.

Table 4.7.7: Future Year Plus Project Intersection Level of Service Summary

Intersection		Control	Peak Hour	2025 Without Project		2025 With Project		Project Impact	
				ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/Delay (Net Change)	Yes/No
1	Douglas Drive/Warland Drive and Katella Avenue	Signal	AM	0.477	A	0.486	A	0.009	No
			PM	0.559	A	0.565	A	0.006	No
		Signal (Delay)	AM	6.8	A	7.7	A	0.9	No
			PM	9.4	A	9.8	A	0.4	No
2	Douglas Drive/ Driveway 2 and Driveway 1/Plaza Drive	AWS	AM	N/A	N/A	N/A	N/A	N/A	No
			PM	N/A	N/A	N/A	N/A	N/A	No
		AWS (Delay)	AM	7.2	A	7.3	A	0.1	No
			PM	7.8	A	7.9	A	0.1	No
3	Existing Driveway/McDonnell Drive and Plaza Drive	CSS	AM	N/A	N/A	N/A	N/A	N/A	No
			PM	N/A	N/A	N/A	--	N/A	No
		CSS (Delay)	AM	10.9	B	10.9	B	0.0	No
			PM	12.0	B	11.9	B	(0.1)	No
4	Valley View Street and Plaza Drive/Chip Avenue	Signal	AM	0.582	A	0.582	A	0.000	No
			PM	0.856	D	0.860	D	.0004	No
		Signal (Delay)	AM	18.6	B	18.7	B	0.1	No
			PM	45.7	D	46.8	D	1.1	No

Source: *Traffic Impact Analysis* (Urban Crossroads, November 2023).
Note: Delay is reported in seconds.
CSS = cross-street stop control
ICU = Intersection Capacity Utilization
LOS = level of service
N/A = not available

As discussed in Section 4.7.4, the City of Cypress General Plan Circulation Element identifies LOS D or better as the desired citywide operating standard for most City streets. As shown in **Table 4.7.7**, traffic associated with the proposed project when combined with the cumulative projects would not exceed LOS D. Accordingly, the proposed project in combination with the cumulative projects would not conflict with circulation policies in the General Plan. Furthermore, like the proposed project, the

cumulative projects would be required to comply with applicable programs, plans, ordinances, and policies addressing the circulation system. Accordingly, the proposed project in combination with the cumulative projects would not result in significant cumulative impacts associated with conflicts with these programs, plans, and policies.

As shown above in **Table 4.7.6**, the proposed project's VMT per employee would be lower than the Orange County regional threshold; therefore, the proposed project would have a less than significant impact related to VMT. Like the proposed project, the cumulative projects would be required to evaluate VMT as part of the environmental review process for those projects. In the event significant VMT impacts were identified, the project would be required to adopt appropriate mitigation to reduce impacts to a less than significant level. Accordingly, the proposed project in combination with the cumulative projects would not result in significant cumulative impacts associated with VMT.

The proposed project would result in a less than significant impact with mitigation incorporated in relationship to design hazards. This mitigation would include a truck access and routing plan and truck signage and striping to help accommodate truck access to the proposed project driveways. Similarly, the neighboring Goodman Center Project would also incorporate a truck access and routing plan and truck signage and striping to help accommodate truck access. It is assumed that the other cumulative projects would be designed in a manner consistent with the City's design standards and designs would be subject to review and approval by the City's Public Works Department. Consistency with the City's requirements would prevent implementation of design hazards. Accordingly, the proposed project in combination with the cumulative projects would not result in significant cumulative impacts associated with design hazards.

Finally, the proposed project would allow for adequate emergency access via the two planned driveways. Similar to potential design hazards, it is assumed that the cumulative projects would be designed to meet the City's design standards and would be approved by the City prior to implementation. Therefore, the proposed project in combination with the cumulative projects would not result in significant cumulative impacts associated with emergency access.

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4.8 TRIBAL CULTURAL RESOURCES

This section provides a discussion of the existing tribal cultural resource environment and an analysis of potential impacts due to implementation of the 5665 Plaza Drive Project (proposed project). According to California PRC Section 21080.3.1 and Chapter 532, Statutes 2014 (i.e., AB 52), "tribal cultural resources" are defined as the following:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either: (A) included or determined to be eligible for inclusion in the California Register of Historical Resources; or (B) included in a local register of historical resources as defined in subdivision (k) of Section 5020.1

2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1

This section summarizes information obtained from SB 18 and AB 52 Native American consultation efforts completed in support of the proposed project. The record of these consultation efforts is contained in **Appendix H** of this EIR.

4.8.1 Scoping Process

The City received 3 comment letters during the public review period for the NOP. For copies of the NOP comment letters, refer to **Appendix A** of this Draft EIR. One comment letter included comments related to tribal cultural resources. The letter from the Native American Heritage Commission (NAHC) received on June May 10, 2024, outlined the City's tribal consultation requirements under AB 52 and SB 18.

4.8.2 Regulatory Setting

4.8.2.1 Federal Regulations

Archaeological Resources Protection Act of 1979 (6 U.S.C. § 470aa *et seq*.). The Archaeological Resources Protection Act was enacted in 1979 with the purpose of securing the protection of archaeological resources and sites on public lands and Native American lands, and to foster increased cooperation and exchange of information between governmental authorities, the professional archaeological community, and private individuals.

Native American Graves Protection and Repatriation Act (25 U.S.C. ch. 32 § 3001 *et seq*.).The Native American Graves Protection and Repatriation Act (NAGPRA) was passed in 1990 with the purpose of outlining a process for museums and federal agencies to return certain Native American cultural items (e.g., human remains, funerary objects, sacred objects, or objects of cultural patrimony) to lineal descendants, and culturally affiliated Indian tribes. NAGPRA also establishes procedures for the inadvertent discovery or planned excavation of Native American cultural items on federal or tribal lands. While these provisions do not apply to discovery or excavations on private or State lands, the collection portions of NAGPRA may apply to cultural items if they are under the control of an institution that receives federal funding. NAGPRA also makes it a criminal offense to traffic in Native American human remains without right of possession or in cultural items obtained in violation of NAGPRA.

4.8.2.2 State Regulations

Native American Heritage Commission (NAHC). In 1976, the California State Government passed AB 4239, creating the NAHC. The NAHC is responsible for identifying and categorizing Native American cultural resources as well as preventing damage to designated sacred sites and associated artifacts and remains. Legislation passed in 1982 authorized the NAHC to identify a Most Likely Descendant (MLD) when Native American remains are found outside the boundaries of a designated cemetery. An MLD has the authority to make recommendations in regard to the treatment and disposition of the discovered remains.

California Public Resources Code Sections 5097.9–5097.991. California PRC Sections 5097.9–5097.991 provide protection to Native American historical and cultural resources (including sanctified cemeteries, places of worship, religious sites, or sacred shrines) and sacred sites, and gives the NAHC enforcement authority.

Specifically, California PRC Section 5097.98 outlines procedures that must be followed in the event that human remains are discovered. The County Coroner shall make a determination within 2 working days from the time the person responsible for the excavation, or designee, notifies the County Coroner of the discovery or recognition of the human remains. If the County Coroner identifies the remains to be of Native American origin or has reason to believe that the remains are those of Native American origin, the County Coroner must contact the California NAHC within 24 hours. The NAHC representative will then alert a Native American MLD to conduct an inspection of the site and to determine the following course of treatment and action. Additionally, State CEQA Guidelines Section 15064.5 sets forth a procedure if human remains are found on land outside of federal jurisdiction.

Health and Safety Code Section 7050.5. Section 7050.5 of the California Health and Safety Code protects Native American burials, remains, and associated grave artifacts in the event they are discovered in any location other than a designated cemetery. The Health and Safety Code mandates the immediate stop of excavation on the site as well as any adjacent or overlying area where the remains or associated items are found and provides for the sensitive disposition of those remains. Should remains be discovered, the County Coroner must determine that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or designee, in the manner provided in PRC Section 5097.98.

Senate Bill 18 Tribal Consultation. California Government Code Section 65352.3 (adopted pursuant to the requirements of SB 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a General or Specific Plan. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction and are identified, upon request, by the NAHC. As noted in the Governor's Office of Planning and Research's *Tribal Consultation Guidelines, Supplement to General Plan Guidelines* (2005)[85], "the intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places."

Assembly Bill 52 Tribal Consultation. California PRC Section 21080.3.1 and Chapter 532, Statutes 2014 (i.e., AB 52), require that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource, as defined, is a project that may have a significant effect on the environment. The bill requires a lead agency to begin consultation with each California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation, prior to determining whether a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report is required for a project. The bill specifies examples of mitigation measures that may be considered to avoid or minimize impacts on tribal cultural resources. The bill makes the above provisions applicable to projects that have a Notice of Preparation or a notice of Negative Declaration or Mitigated Negative Declaration filed on or after July 1, 2015. By requiring the lead agency to consider these effects relative to tribal cultural resources and to conduct consultation with California Native American tribes, this bill imposes a State-mandated local program.

4.8.2.3 Regional Regulations

There are no regional regulations that are applicable to tribal cultural resources relevant to the proposed project.

4.8.2.4 Local Regulations

There are no local regulations that are applicable to tribal cultural resources relevant to the proposed project.

4.8.3 Existing Environmental Setting

The area that is now the City of Cypress was prehistorically occupied by several different Native American tribes with unique oral histories, societal structures, and ways of life. This area is within the traditional boundaries of the Gabrielino. To date, no federally recognized tribes claim to have occupied the land that is now considered the City of Cypress.

4.8.4 Methodology

4.8.4.1 Senate Bill 18

California Government Code Section 65352.3 (adopted pursuant to the requirements of SB 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a General or Specific Plan. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction and are identified, upon request, by the NAHC. As noted in the Governor's Office of Planning and Research's *Tribal Consultation Guidelines, Supplement to General Plan Guidelines* (2005),[85] "The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places."

[85] Governor's Office of Planning and Research (OPR). 2005. *Tribal Consultation Guidelines, Supplement to General Plan Guidelines*. Website: https://www.parks.ca.gov/pages/22491/files/tribal_consultation_guidelines_ vol-4.pdf (accessed May 2023).

The NAHC was contacted to conduct a SLF search and to provide a list of Native American contacts for the project pursuant to SB 18. The NAHC responded on November 16, 2023, stating than an SLF search was completed for the opportunity sites with negative results. The NAHC recommended that 21 Native American individuals representing the Diegueno, Kumeyaay, Gabrielino, Gabrielino/ Tongva, Juaneño, Cahuilla, and Luiseño groups be contacted for information regarding tribal cultural resources that could potentially be affected by the project. These 21 individuals were contacted via letter by certified mail on November 20, 2023. The letters, which concurrently fulfilled both SB 18 and AB 52 requirements, provided each tribe with an opportunity to request consultation with the City regarding the proposed project. In compliance with SB 18, the tribes had 90 days from the date of receipt of notification to request consultation on the proposed project. A response was received from Chairman Andrew Salas on behalf of the Gabrieleño Band of Mission Indians – Kizh Nation. This response did not request consultation on the project but did request consultation on future projects within the area.

4.8.4.2 Assembly Bill 52

Chapter 532, Statutes of 2014 (i.e., AB 52), requires that Lead Agencies evaluate a project's potential to impact "tribal cultural resources." Such resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register or included in a local register of historical resources (PRC Section 21074). AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource falling outside the definition stated above nonetheless qualifies as a "tribal cultural resource."

Also, per AB 52 (specifically PRC Section 21080.3.1), as Lead Agency, the City must consult California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site and have previously requested that the Lead Agency provide the tribe with notice of such projects. Only one response was received in response to the City's AB 52 letters. The Kizh Nation emailed City staff to request consultation. The Kizh Nation sent the City proposed mitigation measures for tribal cultural resources, which the City accepted with no modifications or revisions.

Letters have also been sent to Native American tribal contacts provided by the NAHC, as previously described. The letters, simultaneously compliant with both SB 18 and AB 52 guidelines, provided each tribe with an opportunity to request consultation with the City regarding the proposed project. In compliance with AB 52, tribes had 30 days from the date of receipt of notification to request consultation on the proposed project. No requests for consultation on the project were received in response to the transmitted SB 18/AB 52 combination letters.

4.8.5 Thresholds of Significance

The thresholds for tribal cultural resources impacts used in this analysis are consistent with Appendix G of the State CEQA Guidelines and the City's Initial Study/Environmental Checklist. The proposed project may be deemed to have a significant impact with respect to tribal cultural resources if it would:

Threshold TCR-1: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site,

feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).

Threshold TCR-2: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

4.8.6 Project Impacts

Threshold TCR-1: **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?**

Impact TCR-1: No Impact. As previously discussed in Section 4.2, Cultural Resources, of this EIR, the project site does not contain any known historical resources. In addition, an SLF search for the site was requested from the NAHC on September 27, 2023, and no resources were noted in the database based on NAHC correspondence, dated November 16, 2023.

Native American consultation was conducted in compliance with AB 52. As part of the consultation process, a review of the SLF by the NAHC yielded negative results. Subsequently 21 Native American representatives were contacted by the City to determine their desire to consult on the proposed project, as detailed below.

- Campo Band of Diegueno Mission Indians
- Ewiiaapaayp Band of Kumeyaay Indians
- Gabrieleño Band of Mission Indians - Kizh Nation
- Gabrieleño/Tongva San Gabriel Band of Mission Indians
- Gabrielino/Tongva Nation
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino-Tongva Tribe
- Juaneño Band of Mission Indians Acjachemen Nation - Belardes

- Juaneño Band of Mission Indians Acjachemen Nation 84A
- La Posta Band of Diegueno Mission Indians
- Manzanita Band of Kumeyaay Nation
- Mesa Grande Band of Diegueno Mission Indians
- Pala Band of Mission Indians
- Santa Rosa Band of Cahuilla Indians
- Soboba Band of Luiseño Indians

During that process, the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) stated that the project site is within their tribal territory and requested consultation with the City. The Kizh Nation was provided with a summary of the project and its location. No information regarding specific known tribal cultural resources on the project site was provided by the Kizh Nation. Therefore, the proposed project would not result in any impacts to tribal cultural resources that are listed or eligible for listing in the State or local register of historical resources. No mitigation is required.

Threshold TCR-2: **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

Impact TCR-2: Less Than Significant with Mitigation Incorporated. Effective July 1, 2015, AB 52 requires meaningful consultation with California Native American Tribes on potential impacts to Tribal Cultural Resources, as defined in California PRC Section 21074. A tribe must submit a written request to the relevant lead agency if it wishes to be notified of proposed projects in its traditionally and culturally affiliated area. The lead agency must provide written formal notification to the tribes that have requested it within 14 days of determining that a project application is complete or of deciding to undertake a project. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Consultation concludes when either (1) the parties agree to mitigation measures to avoid a significant effect, if one exists, on a tribal cultural resource, or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. AB 52 also addresses confidentiality during tribal consultation per PRC Section 21082.3(c).

California Government Code Section 65352.3 (adopted pursuant to the requirements of SB 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan, or to designate open space that includes Native American Cultural Places.

Correspondence to the tribes recommended by NAHC was transmitted on November 20, 2023. The City currently maintains a list of tribal councils based on a list of councils and corresponding Native American representatives that have requested to be notified of proposed projects in their respective areas of traditional and cultural affiliation. All tribal contacts on this list were sent a letter from the City on November 20, 2023, for the purposes of AB 52 consultation. Only one response was received in response to the City's AB 52 letters. The Kizh Nation emailed City staff to request consultation. The Kizh Nation sent the City proposed mitigation measures for tribal cultural resources, which the City accepted with no modifications or revisions.

As discussed previously in Section 4.2 Cultural Resources, the project site does not contain any "historical resources" as defined by CEQA. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines or PRC 5020.1(k).

The project site is not likely to contain any prehistoric site or archaeological resources based on archival research and field surveys conducted for the project site. There is little potential for the proposed project to impact prehistoric resources due to the low likelihood of resource presence, significant prior disturbance from past grading and development activities on the project site and in the surrounding area. However, **Mitigation Measure CUL-1**, as provided in Section 4.2 Cultural Resources, has been included to mitigate potentially significant impacts associated with the unlikely discovery of archaeological resources, including tribal cultural resources (TCRs), on the project site. Therefore, implementation of **Mitigation Measure CUL-1** would reduce potentially significant impacts to unknown tribal cultural resources to a less than significant level.

The project site is not likely to contain any human remains due to the fact that soils on the site have been previously disturbed associated with prior disturbance from past grading and development activities on the project site and surrounding area. However, **Regulatory Compliance Measure CUL-1**, as provided in Section 4.2, has been included to mitigate potentially significant impacts associated with the unlikely discovery of human remains, including those determined to be of Native American descent, on the project site. Therefore, implementation of **Regulatory Compliance Measure CUL-1** would reduce potentially significant impacts to unknown human remains to a less than significant level.

As noted above, the Kizh Nation provided mitigation measures to address potential impacts related to tribal cultural resources. Implementation of **Mitigation Measures TCR-1 through TCR-3**, which incorporate the recommendations of the Kizh Nation, would reduce any potential impacts to previously undiscovered tribal cultural resources to a less than significant level. Therefore, on this basis and as a result of the City's consultation with the Kizh Nation or any other interested local Native American tribe, the City has concluded that, with implementation of **Mitigation Measures TCR-1 through TCR-3**, potential impacts related to unknown buried tribal cultural resources would also be reduced below a level of significance.

4.8.7 Level of Significance Prior to Mitigation

No impacts to known tribal cultural resources listed or eligible for listing in the California Register or in a local register would occur. Prior to mitigation, the proposed project has the potential to result in significant impacts to previously undiscovered tribal cultural resources.

4.8.8 Regulatory Compliance Measures and Mitigation Measures

4.8.8.1 Regulatory Compliance Measures

No Regulatory Compliance Measures are required.

4.8.8.2 Mitigation Measures

Refer to **Mitigation Measures TCR-1 through TCR-3**.

Mitigation Measure TCR-1

Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities. The project Applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation). The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project Applicant/lead agency upon written request to the Tribe.

On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh Nation from a designated point of contact for the project Applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh Nation to the project Applicant/lead agency

that no future, planned construction activity and/or development/ construction phase at the project site possesses the potential to impact Kizh Nation TCRs.

Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh Nation monitor and/or Kizh Nation archaeologist. The Kizh Nation will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

Mitigation Measure TCR-2

Unanticipated Discovery of Human Remains and Associated Funerary Objects. Native American human remains are defined in Public Resources Code 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.

Human remains and grave/burial goods shall be treated alike per California Public Resources Code Section 5097.98(d)(1) and (2).

Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh Nation determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh Nation monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)

Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Mitigation Measure TCR-3

Procedures for Burials and Funerary Remains. As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.

If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.

The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.

In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.

In the event preservation in place is not possible despite good faith efforts by the project Applicant/developer and/or landowner,

before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.

Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

4.8.9 Level of Significance after Mitigation

No impacts to known tribal cultural resources listed or eligible for listing in the California Register or in a local register would occur. **Mitigation Measures TCR-1 through TCR-3** would reduce potential impacts to newly discovered tribal cultural resources to a less than significant level.

4.8.10 Cumulative Impacts

Defined in Section 15130 of the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and reasonably foreseeable probable future projects in an area of interest.

The proposed project would result in less than significant impacts to known and unknown tribal cultural resources listed or eligible for listing in the California Register, in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or otherwise determined by the lead agency to be significant. Further, each individual development proposal received by the City that requires discretionary approval is required to undergo individual environmental review pursuant to CEQA. AB 52 outreach would be required for those discretionary projects for which a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report is prepared. Furthermore, impacts of other projects on tribal cultural resources are generally site-specific resulting from ground-disturbing activities, which would require unique impact analysis to

determine the nature and extent of the resources and identify appropriate mitigation measures that would reduce or avoid significant impacts. Thus, there is no potential for the project to contribute towards a significant cumulative impact associated with the significance of a tribal cultural resource pursuant to California Code of Regulations Section 15064.5.

Additionally, when resources can be assessed and/or protected as they are discovered, impacts to these resources are less than significant. As such, implementation of **Mitigation Measures TCR-1 through TCR-3** would ensure that the proposed project, together with the related projects, would not result in significant cumulative impacts to tribal cultural resources.

5.0 ALTERNATIVES

5.1 INTRODUCTION

This chapter of the EIR identifies potential alternatives to the 5665 Plaza Drive Project in the City of Cypress. This discussion includes a summary of the project and the project objectives, the project- related impacts, identification of the alternatives considered but rejected from further analysis, and presentation of the alternatives analysis, as well as identification of the environmentally superior alternative.

CEQA Guidelines Section 15126.6 requires that an EIR include a discussion of a reasonable range of project alternatives that would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project and evaluate the comparative merits of the alternatives." EIRs are not required to evaluate alternatives that are infeasible, rather the purpose of the alternatives analysis is to foster informed decision making and public participation.

CEQA Guidelines Sections 15126.6 (e) and (f) specify:

- The "no project" alternative shall also be evaluated, along with its impact. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

- The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the proposed project. Of those alternatives, the EIR needs to examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the proposed project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making.

In addition to specifying that the EIR evaluate a range of reasonable alternatives to the proposed project, Section 15126.6 (c) of the CEQA Guidelines requires that an EIR identify any alternatives that were considered but were rejected as infeasible. Pursuant to the CEQA Guidelines, alternatives to the proposed project, including any considered but rejected, are also evaluated in this section.

5.2 SELECTION OF ALTERNATIVES

Section 21100 of the Public Resources Code and Section 15126 of the State CEQA Guidelines require an EIR to identify and discuss a No Project Alternative and a reasonable range of alternatives to the proposed project that would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant environmental impacts. Each

of the potentially significant impacts of the proposed project is capable of being mitigated to below a level of significance. The alternatives considered in this EIR include the following:

- **Alternative 1: No Project Alternative:** Consistent with State CEQA Guidelines Section 15126.6, the No Project Alternative assumes the existing land uses and condition of the project site at the time the Notice of Preparation (NOP) was published (May 2024) would remain unchanged. Under the No Action Alternative, the existing five-story office building on the project site would remain in place. The No Project Alternative represents the environmental conditions that would exist if no new development of any kind were to occur on the project site. The setting of the project site at the time the NOP was published is described in Chapter 4.0 of this Draft EIR with respect to individual environmental issues and forms the baseline of the impact assessment of the proposed project. While the No Project Alternative would avoid the potential impacts of the proposed project and require no mitigation measures, none of the project objectives would be achieved.

- **Alternative 2: Reduced Footprint Alternative:** Alternative 2 would occupy the same building footprint as the proposed project and would include the construction and operation of a light-industrial building on the project site; however, Alternative 2 would reduce the project footprint by one-third (33 percent). Under this alternative, it is assumed that the light industrial building would be built out at 127,596 square feet (63,798 square feet smaller than the proposed project) and operate at a reduced capacity as compared to the proposed project. Similar to the proposed project, Alternative 2 would be located on the same approximately 8.53-acre project site, include demolition of the existing 150,626-square-foot five-story office building, and construction of a new light industrial building, with associated landscaping, surface parking, and utility improvements. Alternative 2 would provide the same number of loading docks on the western side of the proposed building (25 docks) and the same number of parking spaces (206 parking stalls) on all sides of the new building. Similar to the proposed project, Alternative 2 would relocate the two existing driveways, providing a new westernmost driveway that would be the primary truck access point and path to the truck loading docks on the proposed building's west side, and a new eastern driveway, which would be a shared driveway with the parcel to the east.

- **Alternative 3 – No Refrigeration Warehouse Alternative:** Alternative 3 would occupy the same building footprint as the proposed project; however, the proposed building would not include cold storage space, nor would it accommodate the transport of refrigeration units by trucks accessing the project site. Because the proposed building would not accommodate refrigeration, Alternative 3 would utilize less energy and produce fewer operational emissions of criteria pollutants and greenhouse gases. Similar to the proposed project, Alternative 3 would be located on an approximately 8.53-acre site and include the demolition of the existing 150,626-square-foot five-story office building on the project site and the construction of a new 191,394-square-foot light industrial building with 181,061 square feet of warehouse space and 10,333 square feet of office space with associated landscaping, surface parking, and utility improvements. Alternative 3 would provide the same number of loading docks on the west side of the proposed building and include the same number of parking spaces on all sides of the new building. Additionally, similar to the proposed project, Alternative 3 would relocate

two existing driveways, providing a new westernmost driveway that would be the primary truck access point and path to the truck loading docks on the proposed building's west side and a new eastern driveway, which would be a shared driveway with the parcel to the east.

- **Alternative 4: Deep Dynamic Compaction and Stone Columns:** Alternative 4 would occupy the same building footprint as the proposed project; however, under Alternative 4, both deep dynamic compaction and stone columns would be utilized during construction to reduce the liquefaction potential of project soils. Deep dynamic compaction is a ground improvement technique which involves the repeated dropping of a heavy weight onto the ground surface from a predetermined height to improve the density and load-bearing capacity of soil layers. Similar to the proposed project, Alternative 4 would utilize a 10-ton weight which would be dropped at a height of 60 feet. Stone columns involve filling pre-augered cavities with aggregate, the aggregate is then compacted using static crowd pressure combined with a high frequency, low amplitude vibratory hammer. Deep dynamic compaction and stone columns would reduce the vibratory impact of the proposed project, as the proposed project would only utilize deep dynamic compaction methods for soil compaction. Under Alternative 4, stone columns would be placed around the periphery of the project site, while deep dynamic compaction would only be implemented near the central portions of the project site to reduce vibratory impacts to nearby buildings. Similar to the proposed project, Alternative 4 would be located on an approximately 8.53-acre site and include the demolition of the existing 150,626-square-foot five-story office building on the project site and the construction of a new 191,394-square-foot light industrial building with 181,061 square feet of warehouse space and 10,333 square feet of office space with associated landscaping, surface parking, and utility improvements. Alternative 4 would provide the same number of loading docks on the west side of the proposed building and include the same number of parking spaces on all sides of the new building. Additionally, similar to the proposed project, Alternative 4 would relocate two existing driveways, providing a new westernmost driveway that would be the primary truck access point and path to the truck loading docks on the proposed building's west side and a new eastern driveway, which would be a shared driveway with the parcel to the east.

For the purpose of this analysis, it is assumed that all of the alternatives would comply with applicable federal, State, and local regulations, policies, and ordinances. The alternatives and their impacts are further described below. The Alternatives analysis provides the following:

- A description of the alternative;

- An analysis of the potential environmental impacts of the alternative and the significance of those impacts (per Section 15126.6 of the State CEQA Guidelines, significant effects of an alternative shall be discussed but, in less detail, than those of the proposed project); and

- Summary comparison of the alternative relative to the proposed project's impacts, specifically addressing whether the alternative would meet the project objectives, eliminate or reduce impacts as compared to the project, and include other comparative merit.

5.2.1 Project Summary

As described in Chapter 3.0, Project Description, the proposed project would include the demolition of an existing five-story office building on the project site and the construction of a concrete tilt-up light industrial building. The proposed building would be 191,394 square feet in size including 181,061 square feet of warehouse space and 10,333 square feet of office space (5,184 square feet on the first floor and 5,149 square feet on the second floor). The proposed office space would be located at the southeast corner of the building. The maximum building height would be approximately 51 feet, 6 inches, to the top of the parapet on the northeast and southeast corners of the building; however, the majority of the building would have a maximum height of 40 feet. Additionally, the proposed project would include associated site improvements, including landscaping, surface parking, and utility improvements.

5.2.2 Project Objectives

The alternative is analyzed to determine whether it achieves the basic objectives of the proposed project. The underlying purpose of the proposed project would be to meet a greater market demand for state-of-the-art light industrial buildings by replacing a vacant office building. As stated in Chapter 3.0, the City has established the following intended specific objectives for the proposed project that would serve to aid decision-makers in their review of the proposed project and its associated environmental impacts:

1. To meet a greater market demand for state-of-the-art light industrial buildings by replacing a vacant office building.

2. To promote development that will attract new businesses to operate in the City.

3. To encourage business development that will generate a range of employment opportunities for the community.

4. To help attract new business enterprises that will result in a positive flow of revenue to the City.

5.2.3 Project-Related Impacts

As described further in Chapter 2.0, Introduction, the Initial Study (IS) for the proposed project (**Appendix B**) determined that all impacts would be less than significant for Aesthetics, Agricultural/Forestry Resources, Biological Resources, Hazards and Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mineral Resources, Population/Housing, Public Services, Recreation, Utilities/Service Systems, and Wildfire. Accordingly, this EIR addresses potential impacts associated with Air Quality, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Noise, Transportation, and Tribal Cultural Resources.

The proposed project would result in less than significant impacts to Air Quality, Energy, and Greenhouse Gas Emissions. No mitigation measures would be required to reduce project-related impacts, and the proposed project would not result in any significant unavoidable impacts.

The proposed project would result in less than significant impacts with mitigation incorporated to Cultural Resources, Geology and Soils, Noise; Transportation/Traffic; and Tribal Cultural Resources.

For the purpose of this alternatives analysis, it is assumed the alternatives would comply with applicable federal, State, and local regulations, policies, and ordinances. It is also assumed that all mitigation measures required for project implementation would also apply to any project alternative and that similar reductions in impacts would be achieved through such mitigation. Therefore, the following discussion focuses on the ability of the alternative to further reduce or lessen project impacts and the potential impacts of the project related to these issues.

5.3 ALTERNATIVES INITIALLY CONSIDERED BUT REJECTED FROM FURTHER CONSIDERATION

The following is a discussion of the development alternatives considered during the environmental review process and the reasons they were not selected for detailed analysis in the Alternatives section of this Draft EIR.

5.3.1 Alternative Sites Considered

In accordance with Section 15126.6(c) of the CEQA Guidelines, an EIR should identify alternatives considered for analysis but rejected as infeasible and briefly explain the reasons for their elimination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR is failure to meet most of the basic project objectives, infeasibility, or inability to avoid or substantially reduce significant environmental impacts. Alternatives that have been initially considered and rejected as infeasible include the following, which have been rejected, as detailed below, either because they would create new or more severe impacts compared to the proposed project, are repetitive of other alternatives, would not meet the project objectives and requirements, or are otherwise considered infeasible.

5.3.2 Off-Site Alternative

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant impacts of the project. The key question and first step in the analysis is whether any of the significant impacts of the project would be avoided or substantially lessened by relocating the project. Only locations that would avoid or substantially lessen any of the significant impacts of the project need be considered for inclusion in the EIR (State CEQA Guidelines, Section 15126.6[f][2][A]). Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the Project Applicant can reasonably acquire, control, or otherwise have access to the alternative site (State CEQA Guidelines Section 15126.6[f][1]). If it is determined that no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion (State CEQA Guidelines Section 15126.6[f][2][B]).

No alternative locations where the proposed project could be undertaken are analyzed in the Draft EIR. As discussed further below, there is no other property in the City that would support a development similar to the proposed project. The surrounding area is highly urbanized, and there

is no land of sufficient size currently available for development (approximately 8.53 acres) to develop the proposed project in an area that would be compatible with light industrial uses. In addition, the Applicant/Developer does not own or control any other property within the City or in the vicinity of the project site that would be suitable for development of the proposed project. Moreover, the Applicant/Developer cannot reasonably acquire or control an alternative site in a timely fashion that would allow for the implementation of a project with similar uses and square footage.

The following alternative sites were considered as potential alternatives to the project site, but eliminated for the reasons discussed above and below:

Alternative Site within the Specific Plan Area: The planning areas within the McDonnell Specific Plan Area are primarily designated for industrial, warehouse, office, and commercial uses. The light industrial uses of the proposed project would be compatible with the uses in Planning Area 1 (Industrial/Warehouse/Office) and Planning Area 2 (Industrial Warehouse). The proposed project is located in Planning Area 1. Planning Area 1 encompasses a total of approximately 16 acres. There is insufficient available space in the remaining parts of Planning Area 1 to accommodate the proposed project. Planning Area 2 is located directly adjacent to Planning Area 1 and encompasses an area of approximately 15 acres. There would be insufficient space within Planning Area 2 as all available areas are already built out or projects are currently under construction. As such neither planning area would have sufficient space to accommodate the proposed project. Development of the proposed project within another portion of the McDonnell Specific Plan is not a feasible option. Therefore, alternative sites within the specific plan area were rejected from further consideration and are not analyzed further in this Draft EIR.

Cypress Town Center and Commons Specific Plan 2.0: The Cypress Town Center and Commons Specific Plan 2.0, approved by voters in 2018 as part of a ballot initiative (Measure A), covers an approximately 154.4-acre area located approximately 1.1 mile west of the project site and generally bound by Cerritos Avenue, Katella Avenue, and Lexington Drive. The Cypress Town Center and Commons Specific Plan 2.0 established a comprehensive master plan and regulatory framework to develop a town center, housing, and public park space in parts of the Los Alamitos Race Course, the former Cypress Golf Club, and adjacent property. Although some of the property included in the Cypress Town Center and Commons Specific Plan 2.0 area may be currently available for development, the use of this potential alternative site for the proposed project is infeasible for several reasons. First, the Project Applicant does not own or control this land. Second, the available area within the Cypress Town Center and Commons Specific Plan 2.0's Town Center District, is planned for a variety of retail, entertainment, commercial, and residential uses to create a gathering place and "main street" for the community. Despite the fact that the light industrial facility included in the proposed project would not be an expressly prohibited use, it is reasonable to conclude that the facility would not be permitted within the Town Center District because it shares some key characteristics (a warehouse, loading docks, and large volumes of goods entering the site via trucks) with other land uses such as warehousing, that are expressly prohibited within the Town Center District. In addition, the proposed project's uses would not be permitted in any of the other land use districts in the Cypress Town Center and Commons Specific Plan 2.0 area. As noted above, the Cypress Town Center and Commons Specific Plan 2.0 was approved by the voters of the City of Cypress; therefore, with the exception of certain minor

adjustments, it may only be amended or repealed by a vote of the people. Development of the proposed project within the Cypress Town Center and Commons Specific Plan 2.0 is not a feasible option.

Development of the proposed project at an alternative site (assuming one was available) could potentially result in some environmental impacts that would be similar to or greater than those of the proposed project's environmental impacts, depending on the proximity of the alternate site to sensitive uses. Conversely, given that the project site is located in a highly urbanized area, it is unlikely that relocating the proposed project to another site would substantially lessen any of its impacts.

As such, no alternative sites were considered feasible because, as discussed above, the Applicant/ Developer does not own or control another project site in the City, no suitable alternative site is available that would achieve the underlying purpose and objectives of the proposed project, and development of the proposed project on an alternative site would likely result in many of the same environmental impacts as development of the proposed project on the project site. For these reasons, the alternative sites option was rejected from further consideration.

5.4 ALTERNATIVES UNDER CONSIDERATION

The following is a discussion of the alternatives considered in this EIR.

5.4.1 Alternative 1: No Project Alternative

Consistent with State CEQA Guidelines Section 15126.6, the No Project Alternative assumes the existing land uses and condition of the project site at the time the NOP was published (May 2024) would continue to exist without any changes. The setting of the project site at the time the NOP was published is described throughout Chapter 4.0 of this Draft EIR with respect to individual environmental issues and forms the baseline of the impact assessment of the proposed project. The No Project Alternative represents the environmental conditions that would exist if no new development of any kind were to occur on the project site. The No Project Alterative would allow existing conditions on the project site to remain unchanged. While the No Project Alternative would lessen or avoid impacts of the proposed project and require no mitigation measures, none of the project objectives would be achieved.

The following provides a description of the No Project Alternative and its anticipated environmental impacts. The emphasis of the analysis is on comparing the anticipated environmental impacts of the No Project Alternative to the environmental impacts associated with the proposed project. The discussion includes a determination of whether or not the No Project Alternative would reduce, eliminate, or create new significant environmental impacts and would or would not meet the objectives of the proposed project.

5.4.1.1 Environmental Analysis

Air Quality. The No Project Alternative would not require grading or construction, and, assuming no increase in occupancy to the existing office building, would not change or increase the intensity of the existing on-site use, nor increase vehicle trips to and from the project site. If the proposed project were not approved, the existing office building could be re-leased to tenants and new

tenants could move into the currently vacant office space, which would substantially increase vehicle trips in the area. Therefore, no additional air pollutant emissions related to construction and operations would be generated under the No Project Alternative. The No Project Alternative would result in **no impacts** to air quality. Therefore, the level of impact associated with this issue would be less under the No Project Alternative than the proposed project.

Cultural Resources. The No Project Alternative would not require any grading, site work, or demolition because no new development would occur on the project site. No buildings would be constructed on the project site. As no ground disturbance would occur, there is no potential for impacts to previously unidentified or as-of-yet undiscovered cultural materials that may exist at the project site. **No impacts** to on-site cultural resources would occur under this alternative. The level of impact associated with this issue would be less under the No Project Alternative than the proposed project.

Energy. The No Project Alternative would not require any grading, site work, or demolition due to construction on the project site. No new buildings would be constructed on the project site and no increased operations would occur. If the proposed project were not approved, the existing office building could be re-leased to tenants and new tenants could move into the currently vacant office space, which would increase energy demand from current conditions and increase vehicle trips to and from the project site. If no re-occupancy occurred (which is possible without any associated environmental review under existing permits), there would be no increased energy use under the No Project Alternative over existing conditions, resulting in no impacts related to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operations. Therefore, **no impact** related to energy resources would occur under this alternative. The level of impact associated with this issue would be less under the No Project Alternative than the proposed project.

Geology and Soils. The No Project Alternative would not require any grading, excavation, or site work because no demolition or construction activities would occur on the project site. As the project site would not be redeveloped under this alternative, no impact or increased potential for damage to structures/facilities or injury to persons resulting from geologic conditions or seismic/seismic-related events would occur. Furthermore, in the absence of any modification requiring ground disturbance, there would be no potential for impacts to previously unidentified or as-of-yet undiscovered potential paleontological resources that may be located on the project site. While the proposed project included **Regulatory Compliance Measure GEO-1** and **Mitigation Measure GEO-1 through Mitigation Measure GEO-2** to reduce impacts to liquefaction and paleontological resources to a less than significant level, **no impact** to geology and soils would occur under this alternative. The level of impact associated with this issue would be less under the No Project Alternative than the proposed project.

Greenhouse Gas Emissions. The No Project Alternative would not require any grading or site work because no new development would occur on the project site. No new buildings would be constructed on the project site. Although this alternative does not assume that the existing office building would be re-occupied in its entirety, it is possible that the building could be re-leased to new tenants. The increase in occupancy would increase emissions beyond what was assumed in this EIR as “baseline” conditions (e.g., 25 percent occupancy). Re-occupancy of the building could

occur without the need for additional environmental review. Therefore, although this alternative is assumed not to increase greenhouse gas emissions from new on-site uses or additional vehicle trips, based on the assumption that existing conditions would continue, emissions could increase substantially if the building is re-tenanted. No impacts related to greenhouse gas emissions would occur. Therefore, No Project Alternative would result in **no impact** to greenhouse gas emission. The level of impact associated with this issue would be reduced under the No Project Alternative compared to the proposed project.

Noise. The No Project Alternative would not involve any grading, deep dynamic compaction activities, construction vehicle, or truck trips, nor would it involve demolition activities. Therefore, the noise impacts that are typically associated with grading and construction would not occur under this alternative. While the proposed project includes **Regulatory Compliance Measure NOI-1** and **Mitigation Measure NOI-1** to reduce impacts to construction noise and vibration to a less than significant level, all construction impacts associated with this alternative are likely to be reduced and there would be **no impact**. If the proposed project were not approved, the existing office building could be re-leased to tenants and new tenants could move into the currently vacant office space, which would increase vehicle trips to and from the project site and thus increase traffic noise in the area. If no re-occupancy occurred (which is possible without any associated environmental review under existing permits), no noise impacts would occur. Additionally, the stationary noise sources associated with proposed industrial uses would be eliminated, reducing the ambient noise levels. Therefore, this alternative would result in **no impact** related to noise and vibration. The level of impact associated with this issue would be less under the No Project Alternative than the proposed project

Transportation. Under The No Project Alternative, the project site would remain in its current developed state, which includes an existing office building. This alternative would not directly result in an increase in daily traffic volumes on local or regional roadways; therefore, traffic operations at intersections and on roadway segments would not be altered. However, If the proposed project were not approved, the existing office building could be re-leased to tenants, and new tenants could move into the currently vacant office space. Under this scenario, vehicle trips would increase beyond what were assumed to be in this EIR as baseline conditions. A fully occupied office building would significantly increase trips beyond currently existing conditions. While the proposed project includes **Mitigation Measure TRA-1** to reduce impacts to reduce transportation hazards related to truck access and signage to a less than significant level, all impacts associated with this alternative are likely to be reduced and there would be **no impact** on transportation. The level of impact associated with this issue would be less under the No Project Alternative than the proposed project.

Tribal Cultural Resources. The No Project Alternative would not require any grading, site work, or removal of vegetation because no new development would occur on the project site. In addition, no new buildings would be constructed on the project site. As no disturbance of existing topography would occur, there is no potential for impacts to previously identified or any as-of-yet undiscovered tribal cultural materials that may exist. While the proposed project includes **Mitigation Measures TCR-1 through TCR-3**, to reduce tribal cultural resource impacts to a less than significant. The No Project Alternative would result in **no impact** to on-site tribal cultural resources. Therefore, **no impact** related to tribal cultural resources would occur under this

alternative. The level of impact associated with this issue would be less under the No Project Alternative than the proposed project.

5.4.1.2 Attainment of Project Objectives

While the No Project Alternative would eliminate the impacts associated with the proposed project, as well as those impacts determined to be **less than significant**, it would not meet any of the project objectives. Since the project site would remain undeveloped and vacant, this alternative would not: (1) meet a greater market demand for state-of-the-art light industrial buildings by replacing a vacant office building; (2) realize the City's industrial goal, policies, and programs to strengthen its economic base; (3) promote development that will attract new businesses to operate in the City; (4) encourage business development that will generate a range of employment opportunities for the community; or (5) help attract new business enterprises that will result in a positive flow of revenue to the City. As a result, this alternative would not meet the objectives of the proposed project.

5.4.2 Alternative 2: Reduced Footprint Alternative

The following provides a description of the Reduced Footprint Alternative and its anticipated environmental impacts. The purpose of the Reduced Footprint Alternative is to reduce the proposed light industrial square footage and facility footprint, which are the primary sources of project-related air quality, greenhouse gas, and transportation impacts.

The emphasis of the analysis is on comparing the anticipated environmental impacts of the Reduced Footprint Alternative to the environmental impacts associated with the proposed project. The discussion includes a determination of whether or not the Reduced Footprint Alternative would reduce, eliminate, or create new significant environmental impacts and would or would not meet the objectives of the proposed project.

The potential impacts associated with the Reduced Footprint Alternative are described below. As discussed, the Reduced Footprint Alternative would develop the same use as the proposed project on the same project site. As such, it can be assumed that construction methods, equipment, and activities would be similar for both the proposed project and this alternative. It can also be assumed that alterations to topography and vegetation on the site would be similar for both developments. The same regulations, ordinances, standards, and policies applicable to the proposed project would also be applicable to this alternative.

5.4.2.1 Environmental Analysis

Air Quality. The Reduced Footprint Alternative would develop a reduced size light industrial building on the same site as the proposed project. It is assumed that the proposed landscaping, surface parking, and utility improvements identified for the proposed project would remain the same under the Reduced Footprint and construction activities for the proposed project, and this alternative would be similar. However, due to the reduced development under this alternative, this alternative may result in reduced construction and operational emissions, including those due to vehicle trips and stationary equipment, compared to those under the proposed project.

The Reduced Footprint Alternative would result in an approximately 33 percent reduction in development, which would proportionally correlate with a reduction in the number of pollutants emitted during construction and operation of this alternative. As described in Section 4.1, Air Quality, of the EIR, the South Coast Air Basin (SCAB) is currently designated nonattainment for the federal and State standards for ozone (O_3), particulate matter 2.5 microns and less ($PM_{2.5}$), and particulate matter 10 microns in diameter and less (PM_{10}). Consistent with the proposed project, construction of the Reduced Footprint Alternative would not exceed the South Coast Air Quality Management District's (SCAQMD) thresholds, and impacts would **be less than significant**. No mitigation measures are required.

Operation of the Reduced Footprint Alternative would not exceed the significance criteria for daily volatile organic compounds (VOCs), carbon monoxide (CO), sulfur oxides (SO_X), PM_{10}, and $PM_{2.5}$ emissions. The Reduced Footprint Alternative would reduce the number of pollutants emitted during operation. Therefore, operation of the Reduced Footprint Alternative would result in a l**ess than significant impact** related to a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard.

Consistent with the proposed project, the Reduced Footprint Alternative would result in **less than significant** impacts related to CO hot spots, odors, and health risk impacts during operation, and no mitigation measures are required.

All air quality impacts would be reduced compared to those of the proposed project and would be **less than significant.**

Cultural Resources. The Reduced Footprint Alternative would develop the same site as the proposed project and would result in similar alterations to the project site topography. Although the Reduced Footprint Alternative could result in a reduced construction footprint on the site, similar to the proposed project, this alternative would still involve construction on the project site that could potentially disturb previously unknown historical and archaeological resources and human remains, and result in significant impacts. As such, **Mitigation Measure CUL-1** and **Regulatory Compliance Measure CUL-1** would also be required for this alternative to reduce the impacts to less than significant levels. Therefore, under this alternative, potential impacts to cultural resources would be **less than significant with mitigation incorporated.** The level of impact associated with this issue would be similar under the Reduced Footprint Alternative to the proposed project.

Energy. Implementation of the Reduced Footprint Alternative assumes that the eastern portion of the project site would be developed with one light industrial building totaling 127,596 square feet. This represents a reduction in development of 63,798 square feet, or approximately 33 percent, compared to the proposed project. Therefore, implementation of this alternative would result in lower energy demand during construction and operation compared to the proposed project because of the reduced construction activity and level of development. Consistent with the proposed project, this alternative would be required to implement **Regulatory Compliance Measure EN-1** to reduce truck idling times. Therefore, the Reduced Footprint Alternative would result in a **less than significant impact** to the wasteful, inefficient, or unnecessary consumption of

fuel or energy during construction and operation and would incorporate renewable energy or energy efficiency measures into building design, equipment uses, and transportation. Therefore, this alternative would result in a **less than significant impact** related to energy resources. The level of impact associated with this issue would be less under the Reduced Footprint Alternative than the proposed project.

Geology and Soils. The Reduced Footprint Alternative would develop the same site as the proposed project and, therefore, would result in the same potential impacts related to geology and soils and seismic hazards as the proposed project. Consistent with the proposed project, compliance with Seismic and Building Standards in the Building Code as specified in **Regulatory Compliance Measure GEO-1** would be required as a condition under this alternative. Additionally, implementation of **Mitigation Measure GEO-1**, which would require the construction contractor to comply with the recommendations in the Geotechnical Evaluation to reduce the proposed project's impact related to liquefaction would reduce impacts related to liquefaction to less than significant. Therefore, with implementation **Regulatory Compliance Measure GEO-1** and **Mitigation Measure GEO-**, impacts resulting from strong seismic ground shaking, seismic-related ground failure, liquefaction, landslide, unstable slopes, expansive soils, and soil collapse would be **less than significant with mitigation incorporated.**

The Reduced Footprint Alternative would involve the same construction activities on the project site that could impact previously unknown unique paleontological resources or unique geologic features, as the proposed project. As such, implementation of **Mitigation Measure GEO-2** would be required to reduce potential impacts to less than significant levels. Therefore, impacts related to geology and soils under this alternative would be **less than significant with mitigation incorporated.** The level of impact associated with this issue would be similar under the Reduced Footprint Alternative to the proposed project.

Greenhouse Gas Emissions. Implementation of the Reduced Footprint Alternative would result in a reduction in development of 63,798 square feet, or approximately 33 percent, compared to the proposed project. Therefore, implementation of this alternative would result in lower energy demand during construction compared to the proposed project because of the reduction in development. This alternative would also result in reduced emissions from all operational greenhouse gas sources because the emissions from each source would vary in direct proportion to the building size. Total net annual operational emissions (which include energy, mobile, solid waste, and water consumption sources) for this alternative are assumed to be less than the proposed project. Therefore, the Reduced Footprint Alternative would have lower greenhouse gas emission impacts than the proposed project. Greenhouse gas emissions under this alternative, similar to the proposed project, would not exceed the 3,000 metric tons of carbon dioxide equivalent per year (MT CO_2e/year) threshold of significance. Therefore, this alternative would result in a **less than significant impact** related to greenhouse gas emissions. The level of impact associated with this issue would be less under the Reduced Footprint Alternative than the proposed project.

Noise. Construction activities under the Reduced Footprint Alternative would involve the use of generally the same types of construction equipment and vehicles as the proposed project; however, construction activities would take place at further distances from the nearest receptors

as under the proposed project. As a result, the daily construction noise levels generated under this alternative would be less than that generated by the construction of the proposed project. Consistent with the proposed project, **Regulatory Compliance Measure NOI-1** would still be required. Under this alternative deep dynamic compaction activities would occur at further distances from the nearby sensitive receptors and the potential for building damage would be less than the proposed project. Consistent with the proposed project, **Mitigation Measure NOI-1** would still be required to reduce the potential for vibration damage to a less than significant impact. However, due to the reduced project footprint under this alternative, the duration of construction would be reduced, the duration of exposure to noise and vibration impacts would be shorter, and the noise and vibration impacts to nearby receptors would be reduced. Therefore, impacts related to vibration under this alternative, would be **less than significant with mitigation incorporated**. The level of impact associated with this issue would be less under the Reduced Footprint Alternative than the proposed project.

Transportation. The Reduced Footprint Alternative would develop a smaller light industrial building (127,596 square feet, which is 63,798 square feet less than the proposed project) on the same site as the proposed project. It is assumed that the proposed landscaping, surface parking, and utility improvements identified for the proposed project would remain the same under the Reduced Footprint Alternative and construction activities for the proposed project and would be constructed consistent with City standards and regulations. The Reduced Footprint Alternative would result in less of an increase in vehicle trips to and from the project site because the number of trucks accessing the project site would be reduced by 33 percent. Under this alternative, all study area intersections would continue to operate at satisfactory LOS during both peak hours.

Consistent with the proposed project, the Reduced Footprint Alternative would result in **less than significant impacts** concerning conflicts with applicable programs, plans, ordinances, or policies addressing the circulation system, inconsistencies with CEQA Guidelines §15064.3, subdivision (b), and inadequate emergency access. Consistent the proposed project, the Reduced Footprint Alternative would require the implementation of **Mitigation Measure TRA-1**, which involves the installation of on-site traffic signing and striping to direct heavy trucks to the driveway on Douglas Drive. Impacts related to hazards due to a geometric design feature under this alternative would result in a **less than significant impact with mitigation incorporated.** The level of impact associated with this issue would be less under the Reduced Footprint Alternative than the proposed project.

Tribal Cultural Resources. The Reduced Footprint Alternative would develop the same site as the proposed project and would result in similar alterations to the project site topography. Due to the reduced project size proposed under this alternative, this alternative could result in a reduced construction footprint. However, construction of this alternative would still result in ground-disturbing activities that could impact previously unknown tribal cultural resources. Consistent with the proposed project, this alternative would be required to implement **Mitigation Measure CUL-1** and **Regulatory Compliance Measure CUL-1**, to reduce potentially significant impacts to unknown tribal cultural resources and the discovery of human remains, including those determined to be of Native American descent, to a less than significant level. Additionally, the Reduced Footprint Alternative would be required to implement **Mitigation Measures TCR-1 through TCR-3** to reduce potential impacts related to unknown buried tribal cultural resources to

a less than significant level. Therefore, impacts related to Tribal Cultural Resources under this alternative would be **less than significant with mitigation incorporated.** The level of impact associated with this issue would be similar under the Reduced Footprint Alternative than the proposed project.

5.4.2.2 Attainment of Project Objectives

As discussed above, the Reduced Footprint Alternative would develop a smaller light industrial building (127,596 square feet, which is 63,798 square feet less than the proposed project) on the same site as the proposed project. The Reduced Footprint Alternative would fulfill project objectives by constructing a light industrial facility that would provide (1) a greater market demand for state-of-the-art light industrial buildings by replacing a vacant office building; realize the City's industrial goal, policies, and programs to strengthen its economic base; (2) promote development that will attract new businesses to operate in the City; (3) encourage business development that will generate a range of employment opportunities for the community; and (4) help attract new business enterprises that will result in a positive flow of revenue to the City. However, due to the reduced development proposed under this alternative, it would not provide the same capacity or employment opportunities as the proposed project. As such, this alternative would only partially meet project objectives.

5.4.3 Alternative 3: No Refrigeration Warehouse Alternative

The following provides a description of the No Refrigeration Warehouse Alternative and its anticipated environmental impacts. The purpose of the No Refrigeration Warehouse Alternative is to eliminate cold storage space in the proposed light industrial building and truck refrigeration units, which are the primary source of project-related operational air quality impacts and greenhouse gas emissions.

The emphasis of the analysis is on comparing the anticipated environmental impacts of the No Refrigeration Warehouse Alternative to the environmental impacts associated with the proposed project. The discussion includes a determination of whether or not the No Refrigeration Warehouse Alternative would reduce, eliminate, or create new significant environmental impacts and would or would not meet the objectives of the proposed project.

The potential impacts associated with the No Refrigeration Warehouse Alternative are described below. As discussed, the No Refrigeration Warehouse Alternative would develop the same use as the proposed project on the same project site. As such, it can be assumed that construction methods, equipment, and activities would be similar for both the proposed project and this alternative. It can also be assumed that alterations to topography and vegetation on the site would be similar for both developments. The same regulations, ordinances, standards, and policies applicable to the proposed project would also be applicable to this alternative.

5.4.3.1 Environmental Analysis

Air Quality. The No Refrigeration Warehouse Alternative would include the same building footprint as the proposed project, on the same site as the proposed project. It is assumed that the proposed landscaping, surface parking, and utility improvements identified for the proposed project would remain the same under the No Refrigeration Warehouse Alternative. Construction

activities for the proposed project would also remain the same. However, during operation, the No Refrigeration Warehouse Alternative would not include any refrigerated cold storage space in the light industrial building or the transport of refrigeration units by trucks accessing the project site. Consistent with the proposed project, construction of the No Refrigeration Warehouse Alternative would not exceed the SCAQMD's thresholds, and impacts would be **less than significant**.

Operation of the No Refrigeration Warehouse Alternative would not exceed the significance criteria for daily VOCs, CO, SO_X, PM_{10}, and $PM_{2.5}$ emissions The No Refrigeration Warehouse Alternative would reduce the number of pollutants emitted during operation, specifically emissions related to mobile source and energy source emissions. Therefore, consistent with the proposed project, operation of the No Refrigeration Warehouse Alternative would result in a **less than significant impact** related to a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard.

Consistent with the proposed project, the No Refrigeration Warehouse Alternative would result in a **less than significant impact** related to CO hot spots, odors, and health risk impacts during operation, and no mitigation measures are required.

Operational air quality impacts would be reduced compared to those of the proposed project and would be **less than significant**. Therefore, the level of impact associated with this issue would be less under the No Refrigeration Warehouse Alternative than the proposed project.

Cultural Resources. The No Refrigeration Warehouse Alternative would include the same building footprint as the proposed project; however, the No Refrigeration Warehouse Alternative would not include any cold storage space in the light industrial building or the transport of refrigeration units by trucks accessing the project site. The No Refrigeration Warehouse Alternative would result in the same construction footprint on the site as the proposed project. Consistent with the proposed project, construction of this alternative has the potential to impact unidentified archaeological resources during ground-disturbing activities. As such, **Mitigation Measure CUL-1** and **Regulatory Compliance Measure CUL-1** would also be required for this alternative to reduce the impacts to less than significant levels. Therefore, under this alternative, potential impacts to cultural resources would be **less than significant with mitigation incorporated.** The level of impact associated with this issue would be similar under the No Refrigeration Warehouse Alternative to the proposed project.

Energy. The No Refrigeration Warehouse Alternative would include the same building footprint as the proposed project; however, the No Refrigeration Warehouse Alternative would not include any cold storage space in the light industrial building or the transport of refrigeration units by trucks accessing the project site. The No Refrigeration Warehouse Alternative would result in the same construction activities on the site as the proposed project; however, the implementation of this alternative would result in lower energy demand during operation compared to the proposed project due to the of the elimination of cold storage and refrigerated trucks accessing the project site. Consistent with the proposed project, compliance with **Regulatory Compliance Measure EN-1,** which would reduce energy usage on the project site during construction through reducing

truck idling times, would be required under this alternative. With implementation of the regulatory compliance measure, impacts related to energy resources during project construction would be less than significant. The No Refrigeration Warehouse Alternative would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy during construction or operation and would incorporate renewable energy or energy efficiency measures into building design, equipment uses, and transportation. Therefore, this alternative would result in a **less than significant impact** to energy resources. The level of impact associated with this issue would be less under the No Refrigeration Warehouse Alternative than the proposed project.

Geology and Soils. The No Refrigeration Warehouse Alternative would develop the same site as the proposed project and therefore, would result in the same potential impacts related to geology and soils and seismic hazards. Consistent with the proposed project, compliance with Seismic and Building Standards in the Building Code as specified in **Regulatory Compliance Measure GEO-2** would be required as a condition under this alternative. Additionally, implementation of **Mitigation Measure GEO-1**, which would require the construction contractor to comply with the recommendations in the Geotechnical Evaluation to reduce the proposed project's impact related to liquefaction, would reduce impacts related to liquefaction to less than significant and this impact would be **less than significant with mitigation incorporated.** The No Refrigeration Warehouse Alternative would involve the same construction activities on the project site, as the proposed project, which could impact previously unknown unique paleontological resources or unique geologic features. As such, implementation of **Mitigation Measure GEO-2** would be required to reduce potential impacts to less than significant levels and this impact would be **less than significant with mitigation incorporated**. The level of impact associated with this issue would be similar under the No Refrigeration Warehouse Alternative than the proposed project.

Greenhouse Gas Emissions. The No Refrigeration Warehouse Alternative would include the same building footprint as the proposed project; however, the No Refrigeration Warehouse Alternative would not include any cold storage in the light industrial building or the transport of refrigeration units by trucks accessing the project site. The No Refrigeration Warehouse Alternative would result in the same demolition and construction activities and would produce similar greenhouse gas emissions as the proposed project. Under this alternative, operational emissions associated with mobile-source emissions, and energy consumption would be reduced; however, area sources emissions (e.g., maintenance activities and landscaping), waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution) emissions would be similar to the proposed project. Therefore, this alternative would result in a **less than significant impact** to greenhouse gas emissions. The level of impact associated with this issue would be less under the No Refrigeration Warehouse Alternative than the proposed project.

Noise. Construction activities under the No Refrigeration Warehouse Alternative would involve the use of the same types of construction equipment and vehicles as the proposed project, and construction activities would take place at the same distances from the nearest receptors as under the proposed project. As a result, the daily construction noise levels generated under this alternative would be comparable to those generated by the construction of the proposed project, and compliance with **Regulatory Compliance Measure NOI-1** would still be required; this alternative would also result in similar vibration impacts at the nearby sensitive receptors and **Mitigation Measure NOI-1** would still be required to reduce the potential for vibration damage to

a less than significant impact. Under this alternative vibration impacts would be **less than significant with mitigation incorporated.**

Operation of the No Refrigeration Warehouse Alternative has the potential to reduce operational noise as this alternative would not include cold storage fan units. Under the proposed project, these cold storage fan units would operate 24 hours per day and generate a noise level of 57.5 A-weighted decibel equivalent continuous sound level (dBA L_{eq}) at 60 feet. Under the No Refrigeration Warehouse Alternative, it is assumed that the elimination of cold storage would also eliminate the need for cold storage fan units within the warehouse, reducing operational noise compared to the proposed project. Therefore, impacts related to **operational noise** under this alternative, would be **reduced when compared** to the proposed project. The level of impact associated with this issue would be **less** under the No Refrigeration Warehouse than the proposed project.

Transportation. The No Refrigeration Warehouse Alternative would include the same building footprint as the proposed project; however, the No Refrigeration Warehouse Alternative would not include any cold storage space in the light industrial building or the transport of refrigeration units by trucks accessing the project site. The No Refrigeration Warehouse Alternative would result in the same construction activities on the site as the proposed project; however, implementation of this alternative would eliminate cold storage in the proposed warehouse space and would eliminate all refrigerated trucks, reducing the number of daily truck trips. Under this alternative, all study area intersections would continue to operate at satisfactory LOS during both peak hours.

Consistent with the proposed project, the No Refrigeration Warehouse Alternative would result in **less than significant impacts** concerning conflicts with applicable programs, plans, ordinances, or policies addressing the circulation system, inconsistencies with CEQA Guidelines §15064.3, subdivision (b), and inadequate emergency access. Consistent the proposed project, the No Refrigeration Warehouse Alternative would require the implementation of **Mitigation Measure TRA-1**, which involves the installation of on-site traffic signing and striping to direct heavy trucks to the driveway on Douglas Drive. Impacts related to hazards due to a geometric design feature under this alternative would result in a **less than significant impact with mitigation incorporated.** The level of impact associated with this issue would be less under the No Refrigeration Warehouse Alternative than the proposed project.

Tribal Cultural Resources. The No Refrigeration Warehouse Alternative would include the same building footprint as the proposed project, would develop the same site as the proposed project and would result in similar alterations to the project site topography. Construction of this alternative would still result in ground-disturbing activities that could impact previously unknown tribal cultural resources. Consistent with the proposed project, the No Refrigeration Warehouse Alternative would be required to implement Mitigation **Measure CUL-1 and Regulatory Compliance Measure CUL-1**, to reduce potentially significant impacts to unknown tribal cultural resources and the discovery of human remains, including those determined to be of Native American descent, to a less than significant level. Additionally, the No Refrigeration Warehouse Alternative would be required to the implement **Mitigation Measures TCR-1 through TCR-3** to reduce potential impacts related to unknown buried tribal cultural resources to a less than

significant level. Therefore, impacts related to Tribal Cultural Resources under this alternative would be **less than significant with mitigation incorporated.** The level of impact associated with this issue would be similar under the No Refrigeration Warehouse to the proposed project.

5.4.3.2 Attainment of Project Objectives

As discussed above, the No Refrigeration Warehouse Alternative would include the same building footprint as the proposed project; however, the No Refrigeration Warehouse Alternative would not include any cold storage space in the light industrial building or the transport of refrigeration units by trucks accessing the project site. While the No Refrigeration Warehouse Alternative would reduce the operational emissions of criteria pollutants, operational greenhouse gas emissions, operational energy consumption, and stationary noise levels, when compared with the proposed project, this alternative would not totally fulfill Project Objectives 2 and 4, as warehouse projects without cold storage would by definition exclude certain users and generally not be as competitive as warehouses with cold storage. As such, this alternative would only partially meet project objectives.

5.4.1 Alternative 4: Deep Dynamic Compaction and Stone Columns

The following provides a description of the Deep Dynamic Compaction and Stone Columns Alternative and its anticipated environmental impacts. The purpose of the Deep Dynamic Compaction and Stone Columns Alternative is to reduce vibratory impacts to sensitive receptors within the vicinity of the proposed project.

The emphasis of the analysis is on comparing the anticipated environmental impacts of the Deep Dynamic Compaction and Stone Columns Alternative to the environmental impacts associated with the proposed project. The discussion includes a determination of whether or not the Deep Dynamic Compaction and Stone Columns Alternative would reduce, eliminate, or create new significant environmental impacts and would or would not meet the objectives of the proposed project.

The potential impacts associated with the Deep Dynamic Compaction and Stone Columns Alternative are described below. As discussed, the Deep Dynamic Compaction and Stone Columns Alternative would develop the same use as the proposed project on the same project site. As such, it can be assumed that construction methods, equipment, and activities would be similar for both the proposed project and this alternative. It can also be assumed that alterations to topography and vegetation on the site would be similar for both developments. The same regulations, ordinances, standards, and policies applicable to the proposed project would also be applicable to this alternative.

5.4.1.1 Environmental Analysis

Air Quality. The Deep Dynamic Compaction and Stone Columns Alternative would include the same building footprint as the proposed project and the same construction footprint. Implementation of this alternative would result in the same operational air quality impacts as the proposed project; however, the installation of stone columns alongside deep dynamic compaction would require additional construction equipment such as an auger rig and compactors. While the addition of construction equipment has the potential to increase construction emissions when

compared to the proposed project, these emissions would be short term and would not represent a significant increase when compared to the proposed project. Therefore, under the Deep Dynamic Compaction and Stone Columns Alternative, project construction would not exceed the SCAQMD's thresholds, and impacts would be **less than significant.**

Operation of the Deep Dynamic Compaction and Stone Columns Alternative would not exceed the significance criteria for daily VOCs, CO, SO_X, PM_{10}, and $PM_{2.5}$ emissions. The Deep Dynamic Compaction and Stone Columns Alternative would include the same operational impacts as the proposed project and would result in a **less than significant impact** related to a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard.

Consistent with the proposed project, the Deep Dynamic Compaction and Stone Columns Alternative would result in a **less than significant impact** related to CO hot spots, odors, and health risk impacts during operation, and no mitigation measures are required.

Construction emissions under this alternative may result in a negligible increase compared to those of the proposed project. Therefore, the level of impact associated with this issue would be similar under the Deep Dynamic Compaction and Stone Columns Alternative to the proposed project.

Cultural Resources. The Deep Dynamic Compaction and Stone Columns Alternative would include the same building footprint as the proposed project and would develop the same site as the proposed project; however, under this alternative, both deep dynamic compaction and stone columns would be used during construction. Construction activities associated with stone columns would involve the use of augers at shallow-to-medium depths below the ground surface for the drilling of the initial cavities for the installation of stone columns. Under the proposed project, only deep dynamic compaction would be used, and these activities would not include excavation; however, the vibration impacts caused by this activity would likely impact buried archaeological resources, if present. Therefore, consistent with the proposed project, construction using the Deep Dynamic Compaction and Stone Columns Alternative has the potential to impact unidentified archaeological resources during ground-disturbing activities. Implementation of **Mitigation Measure CUL-1** would be required under this alternative to reduce potential impacts to unknown archaeological resources to a less than significant level. Additionally, adherence to **Regulatory Compliance Measure CUL-1** would be required as part of this alternative to ensure that the project has minimal impacts related to unknown buried human remains. Therefore, the level of impact associated with this issue would be similar under the Deep Dynamic Compaction and Stone Columns Alternative to the proposed project.

Energy. Implementation of the Deep Dynamic Compaction and Stone Columns Alternative would include the same building footprint as the proposed project; however, the Deep Dynamic Compaction and Stone Columns Alternative would involve both deep dynamic compaction activities and the installation of stone columns to mitigate the soils liquefaction potential. Under this alternative, impacts to energy during construction would be similar to that of the proposed project. Consistent with the proposed project, this alternative would be required to implement **Regulatory Compliance Measure EN-1** to reduce truck idling times. Therefore, the Deep Dynamic

Compaction and Stone Columns Alternative would result in a **less than significant impact** to the wasteful, inefficient, or unnecessary consumption of fuel or energy during construction and operation and would incorporate renewable energy or energy efficiency measures into building design, equipment uses, and transportation. Therefore, this alternative would result in a **less than significant impact** related to energy resources. The level of impact associated with this issue would be similar under the Deep Dynamic Compaction and Stone Columns Alternative to the proposed project.

Geology and Soils. The Deep Dynamic Compaction and Stone Columns Alternative would develop the same site as the proposed project and, therefore, would result in similar potential impacts related to geology and soils and seismic hazards as the proposed project. Consistent with the proposed project, compliance with Seismic and Building Standards in the Building Code as specified in **Regulatory Compliance Measure GEO-1** would be required as a condition under this alternative. Additionally, implementation of **Mitigation Measure GEO-1**, which would require the construction contractor to comply with the recommendations in the Geotechnical Evaluation to reduce the proposed project's impact related to liquefaction, would reduce impacts related to liquefaction to less than significant. Therefore, with implementation of the regulatory compliance measure and mitigation measure, impacts resulting from strong seismic ground shaking, seismic-related ground failure, liquefaction, landslide, unstable slopes, expansive soils, and soil collapse would be **less than significant with mitigation incorporated.**

The Deep Dynamic Compaction and Stone Columns Alternative would involve the use of augers at shallow-to-medium depths below the ground surface for drilling of the initial cavities for the installation of stone columns. Under the proposed project, only deep dynamic compaction would be used and these activities would not include excavation; however, the vibration impacts caused by this activity would likely impact buried paleontological resources or unique geologic features, if present. Therefore, consistent with the proposed project, construction using the Deep Dynamic Compaction and Stone Columns Alternative has the potential to impact paleontological resources or unique geologic features during ground-disturbing activities. As such, implementation of **Mitigation Measure GEO-2** would be required to reduce potential impacts to less than significant levels. Therefore, impacts related to geology and soils under this alternative would be **less than significant with mitigation incorporated.** The level of impact associated with this issue would be similar under the Deep Dynamic Compaction and Stone Columns Alternative to the proposed project.

Greenhouse Gas Emissions. The Deep Dynamic Compaction and Stone Columns Alternative would include the same building footprint as the proposed project and the same construction footprint. Implementation of this alternative would result in similar construction and operational greenhouse gas emissions, including those due to mobile sources (e.g., cars and trucks), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, waste sources (landfilling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). Therefore, impacts related to greenhouse gas emissions would be **less than significant** under this alternative. The level of impact associated with this issue would be similar under the Deep Dynamic Compaction and Stone Columns Alternative to the proposed project.

Noise. The Deep Dynamic Compaction and Stone Columns Alternative would develop the same site as the proposed project and would involve similar construction activities including demolition, grading, site preparation, building construction, architectural coating, and paving activities; however, under this alternative both deep dynamic compaction and stone columns would be utilized for soil stabilization. This alternative would only utilize deep dynamic compaction within the central portion of the project site, while stone columns would be installed around the periphery of the project site. Under this alternative, it is assumed the deep dynamic compaction activities would not be implemented within 80 feet of the nearest buildings to reduce potential building damage and vibration impacts. While this alternative may generate short-term noise and vibration impacts from associated equipment, compliance with **Regulatory Compliance Measure NOI-1** would reduce construction noise and vibration, and impacts would be **less than significant.**

Operational activities under the Deep Dynamic Compaction and Stone Columns Alternative would involve the same operational activities and generate the noise impacts from project operations as the proposed project. Consistent with the proposed project, under this alternative, noise and vibration impacts would be **less than significant.**

Transportation. The Deep Dynamic Compaction and Stone Columns Alternative would include the same building footprint as the proposed project and would result in generally similar construction activities on the site as the proposed project with generally similar trip generation characteristics. Similar to the proposed project, all study area intersections would continue to operate at satisfactory LOS during both peak hours under the Deep Dynamic Compaction and Stone Columns Alternative.

Consistent with the proposed project, the Deep Dynamic Compaction and Stone Columns Alternative would result in a **less than significant impact** concerning conflicts with applicable programs, plans, ordinances, or policies addressing the circulation system, inconsistencies with CEQA Guidelines §15064.3, subdivision (b), and inadequate emergency access. Consistent with the proposed project, the Deep Dynamic Compaction and Stone Columns Alternative would require the implementation of **Mitigation Measure TRA-1**, which involves the installation of on-site traffic signing and striping. Impacts related to hazards due to a geometric design feature under this alternative would result in a **less than significant impact with mitigation incorporated**. The level of impact associated with this issue would be similar under the Deep Dynamic Compaction and Stone Columns Alternative to the proposed project.

Tribal Cultural Resources. The Deep Dynamic Compaction and Stone Columns Alternative would include the same building footprint as the proposed project; and would develop the same site as the proposed project and would result in similar alterations to the project site topography. The Deep Dynamic Compaction and Stone Columns Alternative would involve the use of augers at shallow-to- medium depths below the ground surface for the drilling of the initial cavities for the installation of stone columns. Both deep dynamic compaction and stone column activities could impact previously unknown tribal cultural resources. Consistent with the proposed project, the Deep Dynamic Compaction and Stone Columns Alternative would be required to implement **Mitigation Measures TCR-1 through TCR-3** to reduce potential impacts related to unknown buried tribal cultural resources to a **less than significant leve**l. Therefore, impacts related to Tribal Cultural Resources under this alternative would be **less than significant with mitigation**

incorporated. The level of impact associated with this issue would be similar under the Deep Dynamic Compaction and Stone Columns Alternative to the proposed project.

5.4.1.2 Attainment of Project Objectives

As discussed above, the Deep Dynamic Compaction and Stone Columns Alternative would include the same building footprint as the proposed project; however, the Deep Dynamic Compaction and Stone Columns Alternative would only include the use of deep dynamic compaction activities within the central portion of the project site and would utilize stone columns around the periphery of the project site during construction. The Deep Dynamic Compaction and Stone Columns Alternative would reduce impacts to ground-borne vibration during project construction when compared with the proposed project. As a result, this alternative would fulfill all of the project objectives to the same degree as the proposed project.

5.5 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an Environmentally Superior Alternative among the proposed project and the alternatives evaluated in an EIR. State CEQA Guidelines Section 15126.6(e)(2) provides that, if the No Project Alternative is the Environmentally Superior Alternative, then the EIR shall also identify an Environmentally Superior Alternative among the other alternatives and the proposed project. The qualitative environmental effects of each alternative in relation to the proposed project are summarized in **Table 5.1**. As explained previously in Section 5.1, Introduction, of this chapter, the comparisons contained in **Table 5.1** and the subsequent discussion are provided for informational purposes only because the proposed project would not result in any significant and unavoidable impacts.

The No Project Alternative would have the least impact on the environment because it would require minimal construction, with the exception of the minor renovation of the existing buildings on the project site and would thereby avoid most of the proposed project's environmental impacts resulting from construction. However, the No Project Alternative cannot be the only Environmentally Superior Alternative. Therefore, according to Section 15126.6(e)(2) of the State CEQA Guidelines, because the No Project Alternative has been identified as the environmentally superior alternative, the EIR shall also identify the proposed project or one of the other alternatives as the Environmentally Superior Alternative.

With the exception of the No Project Alternative, the Deep Dynamic Compaction and Stone Columns Alternative is the Environmentally Superior Alternative. As shown in **Table 5.1**, Alternative 4 would reduce impacts to noise and vibration from "Less than Significant with Mitigation Incorporated" to "Less than Significant" and would have the least impact on noise and vibration compared to all other alternatives. The Deep Dynamic Compaction and Stone Columns Alternative would also meet all of the project objectives of the proposed project. Accordingly, it is determined that the Deep Dynamic Compaction and Stone Columns Alternative is the Environmentally Superior Alternative because it would meet all of the project's objectives and would result in reduced impacts to noise and vibration as compared to the proposed project.

Table 5.1: Comparison of the Environmental Impacts of the Proposed Project and Project Alternatives

Impact Area	Proposed Project Impact with Mitigation (if any)	Alternative 1: No Project Alternative	Alternative 2: Reduced Footprint Alternative	Alternative 3: No Refrigerated Warehouse Alternative	Alternative 4: Deep Dynamic Compaction and Stone Columns Alternative
Air Quality	Less than Significant	Less	Less	Less	Similar
Cultural Resources	Less than Significant[1]	Less[1]	Similar[1]	Similar [1]	Similar[1]
Energy	Less than Significant	Less	Less	Less	Similar
Geology and Soils	Less than Significant[1]	Less[1]	Similar[1]	Similar[1]	Similar[1]
Greenhouse Gas Emissions	Less than Significant	Less	Less	Less	Similar
Noise	Less than Significant[1]	Less[1]	Less[1]	Less[1]	Less
Transportation	Less than Significant	Less[1]	Less[1]	Less[1]	Similar[1]
Tribal Cultural Resources	Less than Significant[1]	Less[1]	Similar[1]	Similar[1]	Similar[1]

[1] Mitigation identified.

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6.0 OTHER CEQA CONSIDERATIONS

6.1 SUMMARY OF SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(c) of the State CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided. Specifically, Section 15126.2(c) states that an EIR shall:

> "Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described."

The Executive Summary of this document (Chapter 1.0) contains a detailed summary that identifies the proposed project's environmental impacts as compared to existing conditions, proposed mitigation measures, and the level of significance of any impacts after mitigation. Implementation of the proposed project would not result in any impacts that are considered significant, adverse, and unavoidable. All environmental issues analyzed in this Draft EIR were determined to result in less than significant impacts or can be reduced to less than significant levels with the incorporation of mitigation measures.

6.2 ENERGY IMPACTS

According to Section 15126.2(b) of the State CEQA Guidelines, "[i]f analysis of the project's energy use reveals that the project may result in significant environmental effects due to wasteful, inefficient, or unnecessary use of energy, or wasteful use of energy resources, the EIR shall mitigate that energy use."

As discussed in Section 4.3, Energy, of this Draft EIR, the proposed project would not result in significant impacts related to energy use. Energy (e.g., fuel) usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. In addition, the net increase in electricity usage attributable to the proposed project would not represent a substantial demand on available electricity resources. Furthermore, automobiles and transportation-related energy use to and from the project site would be subject to fuel economy and efficiency standards applied throughout the State and fuel efficiency is expected to increase throughout the life of the project. Therefore, implementation of the proposed project would not result in a substantial increase in transportation-related energy uses. Neither construction nor operation of the proposed project would result in the wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, no mitigation is required.

6.3 GROWTH-INDUCING IMPACTS

State CEQA Guidelines Sections 15126(d) and 15126.2(e) require that an EIR analyze growth-inducing impacts and discuss the ways in which a proposed project could foster economic or population growth or construction of additional housing, either directly or indirectly, in the surrounding environment. State CEQA Guidelines Section 15126.2(d) also requires a discussion of the characteristics of projects that may encourage and facilitate other activities that could

significantly affect the environment, either individually or cumulatively. To address these issues, potential growth-inducing effects were examined through analysis of the following questions:

- Would the project remove obstacles to, or otherwise foster, population growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development)?

- Would the project foster economic growth?

- Would approval of the project involve some characteristic that may encourage and facilitate other activities that could significantly affect the environment?

Growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment (State CEQA Guidelines Section 15126.2(e)). This issue is presented to provide additional information on ways in which the proposed project could contribute to significant changes in the environment beyond the direct consequences of developing the proposed land uses as described in earlier sections of this Draft EIR.

The area surrounding the project site is highly urbanized and developed with a variety of industrial, commercial, office, and warehouse land uses. The proposed project will require water, sewer, drainage, electricity, and natural gas lines. However, the project site is currently developed and located in a highly urbanized environment where these facilities already exist in place. It is not anticipated that the proposed project would require substantial utility infrastructure improvements.

The construction of the proposed project is anticipated to generate a number of construction-related jobs. However, as discussed in Section 4.14 of the Initial Study prepared for the proposed project (see **Appendix B)**, it is unlikely that a substantial number of employees would need to be relocated from outside the region to meet the need for employees resulting from implementation of the proposed project. In addition, the proposed project would not provide or remove housing on the project site. it is unlikely that the employment offered by the proposed project would cause people to move or relocate to the area solely for the purpose of being close to the project site. Accordingly, the proposed project would not induce either short- nor long-term population growth.

In its existing condition, the project site is developed with an underutilized five-story office building. The project site currently does not generate revenue for the City. The proposed project would provide a new source of property tax revenues to the City, thereby increasing the local tax base. Therefore, the proposed project would foster economic growth.

The proposed project includes the development of a light industrial facility. The proposed project would require an amendment to the McDonnell Specific Plan to allow light industrial uses in the eastern portion of Planning Area 1, and removal of the maximum developable area requirement while retaining the 1.0:1 FAR to maintain consistency with the General Plan. This amendment would not allow for residential uses, or add any permanent residents to the project site. Therefore, the project would not directly increase the City's population beyond existing levels. The proposed Specific Plan Amendment (SPA) would not cause a future increase in density or land use. Accordingly, the proposed project would not have any growth-inducing impacts.

6.4 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

State CEQA Guidelines Section 15126.2(d) requires an EIR to consider and discuss significant irreversible changes that would be caused by implementation of a proposed project. The State CEQA Guidelines specify that the use of nonrenewable resources during the initial and continued phases of a project should be discussed because a large commitment of such resources makes removal or non-use thereafter unlikely. Primary and secondary impacts (e.g., a highway improvement that provides access to a previously inaccessible area) should also be discussed because such changes generally commit future generations to similar uses. Irreversible damage can also result from environmental accidents associated with a project and should be discussed.

The type of development associated with the proposed project would consume limited, slowly renewable, and nonrenewable resources. This consumption would occur during construction of the proposed project and would continue throughout the proposed project's operational lifetime. The development of the proposed project would require a commitment of resources that would include (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the project site.

Construction of the proposed project would require consumption of resources that are not replenishable or that may renew so slowly as to be considered nonrenewable. These resources would include certain types of lumber and other forest products (e.g., hardwood lumber), aggregate materials used in concrete and asphalt (e.g., sand, gravel, and stone), metals (e.g., steel, copper, and lead), petrochemical construction materials (e.g., plastics), and water. Fossil fuels (e.g., gasoline and oil) would also be consumed in the use of construction vehicles and equipment. Water, which is a limited, slowly renewable resource, would also be consumed during construction of the proposed project. Furthermore, the use of construction vehicles and equipment would require the consumption of nonrenewable fossil fuels such as natural gas and oil. As with other resources consumed during construction, the consumption of nonrenewable fossil fuels for energy use would occur on a temporary basis during construction of the proposed project.

Energy use consumed by the proposed project would be associated with natural gas use, electricity consumption, and fuel used for vehicle and truck trips associated with the project. Energy resources would be used for heating and cooling buildings, transportation within the project site, and building lighting. Although there would be an overall increase in energy demand associated with the proposed project, the project would be required to adhere to all federal, State, and local requirements for energy efficiency, including current Title 24 and California Green Building Standards Code (CALGreen Code) standards that establish minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting, which would reduce energy usage. In addition, proposed new development would be constructed using energy efficient modern building materials and construction practices, and the proposed project also would use new modern appliances and equipment, in accordance with the Appliance Efficiency Regulations (Title 20, California Code of Regulations (CCR) Sections 1601 through 1608). The expected energy consumption during construction and operation of the proposed project would be consistent with typical usage rates for industrial use.

In summary, construction and operation of the proposed project would commit the use of slowly renewable and nonrenewable resources and would limit the availability of these resources on the project site for future generations or for other uses during the life of the proposed project. However, the continued use of such resources during operation would be on a relatively small scale and consistent with regional and local urban design and development goals for the area. As a result, the use of nonrenewable resources in this manner would not result in significant irreversible changes to the environment under the proposed project.

7.0 MITIGATION MONITORING AND REPORTING PROGRAM

7.1 MITIGATION MONITORING REQUIREMENTS

California Public Resources Code (PRC) Section 21081.6, which is part of the California Environmental Quality Act (CEQA) statute, mandates that the following requirements shall apply to all reporting or mitigation monitoring programs:

- The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes that have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead agency or a responsible agency, prepare and submit a proposed reporting or monitoring program.

- The lead agency shall specify the location and custodian of the documents or other materials that constitute the record of proceedings upon which its decision is based.

- The lead agency shall provide measures to mitigate or avoid potentially significant effects on the environment that are fully enforceable through permit conditions, agreements, or other measures. Conditions of project approval may be set forth in referenced documents that address required mitigation measures or, in the case of the adoption of a plan, policy, regulation, or other project, by incorporating the mitigation measures into the plan, policy, regulation, or project design.

- Prior to the close of the public review period for a draft Environmental Impact Report (EIR) or Mitigated Negative Declaration (MND), a responsible agency, or a public agency having jurisdiction over natural resources affected by the project, shall either (1) submit to the lead agency complete and detailed performance objectives for mitigation measures that would address the significant effects on the environment identified by the responsible agency or agency having jurisdiction over natural resources affected by the project, or (2) refer the lead agency to appropriate, readily available guidelines or reference documents. Any mitigation measures submitted to a lead agency by a responsible agency or an agency having jurisdiction over natural resources affected by the project shall be limited to measures that mitigate impacts to resources that are subject to the statutory authority of, and definitions applicable to, that agency. Compliance or noncompliance with that requirement by a responsible agency or agency having jurisdiction over natural resources affected by a project shall not limit the authority of the responsible agency or agency having jurisdiction over natural resources affected by a project, or the authority of the lead agency, to approve, condition, or deny projects as provided by this division or any other provision of law.

7.2 MITIGATION MONITORING PROCEDURES

The mitigation monitoring and reporting program for the proposed 5665 Plaza Drive Project (proposed project) has been prepared in compliance with PRC Section 21081.6. It describes the requirements and procedures to be followed by the City of Cypress, as the Lead Agency, to ensure that all mitigation measures adopted as part of the proposed project will be carried out as described in this Initial Study.

Table 7.1 sets forth the proposed mitigation monitoring and reporting program. It lists each of the mitigation measures specified in this Initial Study and identifies the party or parties responsible for implementation and monitoring of each measure.

Table 7.1: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
4.4: Biological Resources					
Regulatory Compliance Measure BIO-1 **Nesting Bird Survey and Avoidance.** If vegetation removal, construction, or grading activities are planned to occur within the active nesting bird season (February 1 through August 31), the City of Cypress, or designee, shall confirm that the Applicant has retained a qualified biologist who shall conduct a preconstruction nesting bird survey no more than 3 days prior to the start of such activities. The nesting bird survey shall include the work area and areas adjacent to the site (within 500 feet, as feasible) that could potentially be affected by project-related activities such as noise, vibration, increased human activity, and dust, etc. For any active nest(s) identified, the qualified biologist shall establish an appropriate buffer zone around the active nest(s). The appropriate buffer shall be determined by the qualified biologist based on species, location, and the nature of the proposed activities. Project activities shall be avoided within the buffer zone until the nest is deemed no longer active, as determined by the qualified biologist.	No more than three days prior to commencement of grading activities	Applicant and City of Cypress Community Development Director, or designee			
4.5: Cultural Resources					
Mitigation Measure CUL-1 **Unknown Archaeological Resources.** In the event that archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the Orange County List of Qualified Archaeologists has evaluated the find in accordance with federal, State, and local guidelines to determine whether the find constitutes a "unique archaeological resource," as defined in Section 21083.2(g) of the California Public Resources Code (PRC). The Applicant and its construction contractor shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the project site. Any found deposits shall be treated in accordance with federal, State and local guidelines,	During construction activities	Applicant and/or Construction Supervisor/City of Cypress Director of Community Development Department, or designee			

Table 7.1: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
including those set forth in PRC Section 21083.2. Prior to commencement of grading activities, the Director of the City of Cypress (City) Community Development Department, or designee, shall verify that all project grading and construction plans include specific requirements regarding California PRC (Section 21083.2[g]) and the treatment of archaeological resources as specified above.					
Regulatory Compliance Measure CUL-1 **Human Remains.** In the event that human remains are encountered on the project site, work within 50 feet of the discovery shall be redirected and the County Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the City of Cypress shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Prior to the issuance of grading permits, the Director of the City of Cypress Community Development Department, or designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.	During construction activities	Construction Supervisor/Applicant			

Table 7.1: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
4.6: Energy					
Regulatory Compliance Measure EN-1 Limit Idling Time. The Applicant and construction contractor would be required to comply with applicable idling regulations for on-road vehicles during project construction and operation, which require truck drivers to turn off their engines within 5 minutes of idling.	Prior to issuance of a building permit	Applicant and City of Cypress Community Development Director, or designee			
4.7: Geology and Soils					
Regulatory Compliance Measure GEO-1 **Compliance with Seismic and Building Standards in the Building Code.** Prior to issuance of the first building permit for the proposed buildings, the City of Cypress (City) Engineer, Building Official, or their designee, and the project soils engineer shall review the building plans to verify that the structural design conforms to the requirements of the City's latest adopted edition of the California Building Standards Code. Structures and walls shall be designed in accordance with applicable sections of the City's Building Code.	Prior to issuance of building permits	Applicant and City of Cypress Engineer, Building official, or designee			
Mitigation Measure GEO-1 **Implementation of Geotechnical Evaluation Recommendations.** The Applicant's construction contractor shall implement the recommendations of the Geotechnical Evaluation prepared for the proposed project, as applicable, to the satisfaction of the City of Cypress' (City) Building Official, or designee. The City's Building Official, or designee, shall confirm recommendations have been implemented into the design and construction of the proposed project prior to the issuance of a building permit.	Prior to issuance of building permits	Applicant and City of Cypress Building official, or designee			
Mitigation Measure GEO-2 **Procedures for Unexpected Paleontological Resources Discoveries.** In the event that paleontological resources are encountered, work in the immediate area of the discovery shall be halted and the Applicant shall retain a professional Paleontologist	During ground-disturbing activities	Applicant and/or Construction Supervisor/City of Cypress Director of Community Development			

Table 7.1: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
who meets the qualifications established by the Society of Vertebrate Paleontology to assess the discovery. The qualified, professional Paleontologist shall make recommendations regarding the treatment and disposition of the discovered resources, as well as the need for subsequent paleontological mitigation, which may include, but not be limited to, paleontological monitoring, collection of observed resources, preservation, stabilization and identification of collected resources, curation of resources into a museum repository, and preparation of a monitoring report of findings. The City of Cypress shall ensure that the recommendations from the qualified, professional Paleontologist shall be followed by the Applicant.		Department, or designee			
4.10: Hydrology and Water Quality					
Regulatory Compliance Measure HYD-1 Construction General Permit. Prior to commencement of construction activities, the Applicant shall obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), NPDES No. CAS000002, Order No. 2022-0057-DWQ, National Pollutant Discharge Elimination System (NPDES) No. CAS000002. This shall include submission of Permit Registration Documents (PRDs), including permit application fees, a Notice of Intent (NOI), a risk assessment, a site plan, a Stormwater Pollution Prevention Plan (SWPPP), a signed certification statement, and any other compliance-related documents required by the permit, to the State Water Resources Control Board via the Stormwater Multiple Application and Report Tracking System (SMARTS). Construction activities shall not commence until a Waste Discharge Identification Number (WDID) is obtained for the project from the SMARTS and provided to the Director of the City of Cypress Community Development Department, or designee, to demonstrate that coverage under the Construction General Permit has been obtained. Project	Prior to commencement of construction activities	Applicant and/or Construction Supervisor/City of Cypress Director of Community Development Department, or designee			

Table 7.1: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
construction shall comply with all applicable requirements specified in the Construction General Permit, including, but not limited to, preparation of a SWPPP and implementation of construction site best management practices (BMPs) to address all construction-related activities, equipment, and materials that have the potential to impact water quality for the appropriate risk level identified for the project. The SWPPP shall identify the sources of pollutants that may affect the quality of stormwater and shall include BMPs (e.g., Sediment Control, Erosion Control, and Good Housekeeping BMPs) to control the pollutants in stormwater runoff. Construction Site BMPs shall also conform to the requirements specified in the latest edition of the Orange County Stormwater Program Construction Runoff Guidance Manual for Contractors, Project Owners, and Developers to control and minimize the impacts of construction and construction-related activities, materials, and pollutants on the watershed. Upon completion of construction activities and stabilization of the project site, a Notice of Termination shall be submitted via SMARTS.					
Regulatory Compliance Measure HYD-2 If groundwater dewatering is required during construction or excavation activities and the dewatered groundwater is discharged to the sanitary sewer system, the Applicant shall obtain a discharge permit from the Director of the City of Cypress Public Works Department. If the dewatered groundwater is discharged to the storm drain system, the Applicant shall obtain coverage under the *General Waste Discharge Requirements for Discharges to Surface Waters that Pose an Insignificant (De Minimis) Threat to Water Quality (*Order No. R8-2020-0006, NPDES No. CAG998001), which covers discharges to surface waters that pose an insignificant (de minimis) threat to water quality within. This shall include submission of a Notice of Intent for coverage under the permit to the RWQCB at least 45 days prior to the start of dewatering. The Applicant shall provide the	Prior to commencement of construction activities	Applicant and/or Construction Supervisor/City of Cypress Director of Public Works, or designee			

Table 7.1: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
Waste Discharge Identification Number (WDID) to the Director of the City's Public Works Department, or designee, to demonstrate proof of coverage under the *De Minimis* Permit. Groundwater dewatering shall not be initiated until a WDID is received from the Santa Ana Regional Water Quality Control Board (RWQCB) and is provided to the Director of the City's Public Works Department, or designee. Groundwater dewatering activities shall comply with all applicable provisions in the permit, including water sampling, analysis, treatment (if required), and reporting of dewatering-related discharges. Upon completion of groundwater dewatering activities, a Notice of Termination shall be submitted to the Santa Ana RWQCB.					
Regulatory Compliance Measure HYD-3 **Water Quality Management Plan.** Prior to the issuance of grading or building permits, the Applicant shall submit a Final Water Quality Management Plan (WQMP) to the City of Cypress Engineer, or designee, for review and approval in compliance with the requirements of the *Waste Discharge Requirements for the County of Orange, Orange County Flood Control District, and the Incorporated Cities of Orange County within the Santa Ana Region Areawide Urban Storm Water Runoff Orange County (Order No. R8-2009-0030, NPDES No. CAS618030, as amended by Order No. R8-2010-0062) (North Orange County MS4 Permit)*. The Final WQMP shall be prepared consistent with the requirements of the *Technical Guidance Document for Water Quality Management Plans* (December 2013) and the Water Quality Management Plan template, or subsequent guidance manuals. The Final WQMP shall specify the BMPs to be incorporated into the project design to target pollutants of concern in runoff from the project site. The City shall ensure that the BMPs specified in the Final WQMP are incorporated into the final project design.	Prior to issuance of grading or building permits	Applicant and City of Cypress Engineer, or designee			

Table 7.1: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
Regulatory Compliance Measure HYD-4 Final Hydrology and Hydraulic Analysis. The Applicant shall submit a Final Hydrology Study to the City of Cypress Director of Public Works, or his/her designee, for review and approval prior to issuance of grading and building permits. The Final Hydrology Study shall be prepared consistent with the requirements of the *Orange County Hydrology Manual* (Orange County Environment Agency 1986) and *Orange County Hydrology Manual Addendum No. 1* (Orange County Environment Agency 1996), or subsequent guidance manuals. The Final Hydrology Study shall demonstrate that the on-site drainage facilities and post-project Best Management Practices (BMPs) (e.g., Modular Wetland Systems) are designed in compliance with the requirements of the *Waste Discharge Requirements for the County of Orange, Orange County Flood Control District, and the Incorporated Cities of Orange County within the Santa Ana Region Areawide Urban Storm Water Runoff Orange County (Order No. R8-2009-0030, NPDES No. CAS618030, as amended by Order No. R8-2010-0062) (North Orange County MS4 Permit)*. The Final Hydrology Study shall also demonstrate that the on-site drainage facilities and post-construction BMPs are adequately sized to accommodate stormwater runoff from the design storm so that post-development peak flow rates for the 10-year 24-hour frequency storm, 25-year 24-hour frequency storm, and 100-year 24-hour frequency storm does not exceed the pre-development flow rate. The City Director of Public Works, or designee, shall ensure that the drainage facilities specified in the Final Hydrology Study are incorporated into the final project design.	Prior to issuance of grading or building permits	Applicant and City of Cypress Director of Public Works, or designee			

Table 7.1: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
4.13: Noise					
Regulatory Compliance Measure NOI-1 **Construction Noise and Vibration.** Prior to issuance of grading permits, the City of Cypress (City) Director of Community Development Department, or designee, shall verify that grading and construction plans include the following requirements: • Ensure that the greatest distance between noise sources and sensitive receptors during construction activities has been achieved. • Construction equipment, fixed or mobile, shall be equipped with properly operating and maintained noise mufflers consistent with manufacturers' standards. • Construction staging areas shall be located away from off-site sensitive uses during the later phases of project development. • The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the project site whenever feasible. • The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators where feasible. • A sign, legible at a distance of 50 feet, shall also be posted at the construction site perimeter. All notices and the signs shall indicate the dates and duration of ground improvement activities, as well as provide a telephone number for the "noise disturbance coordinator." • A "noise disturbance coordinator" shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures to reduce noise levels. All signs posted at the construction site shall list the telephone number for the disturbance coordinator.	Prior to issuance of grading permits	Applicant and/or Construction Supervisor/City of Cypress Director of Community Development Department, or designee			

Table 7.1: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
Mitigation Measure NOI-1 **Construction Vibration Monitoring Plan**. Due to the close proximity to surrounding structures, the City of Cypress (City) Director of Community Development, or designee, shall verify prior to issuance of demolition or grading permits, that the approved plans require that the construction contractor implement the following mitigation measures during project construction activities in the event that the use of heavy equipment is necessary within 25 feet (ft) of surrounding structures or when deep dynamic compaction (DDC) construction activity takes places within 80 ft of surrounding structures: • Notification to nearby businesses detailing the schedule and duration of DDC activities. • Structures that are located within 25 ft of heavy construction activities and within 80 ft of DDC construction activity that have the potential to be affected by ground-borne vibration shall be identified. This task shall be conducted by a qualified structural engineer as approved by the City's Director of Community Development, or designee. • The Applicant's construction contractor shall develop a vibration monitoring and construction contingency plan for approval by the City's Director of Community Development, or designee, to identify appropriate locations in the vicinity of nearby structures where monitoring would be conducted; set up a vibration monitoring schedule; define structure-specific maximum vibration limits based on building inspections; contain provisions to conduct photo, elevation, and crack surveys to document before and after construction conditions at those structures. The plan shall identify construction contingencies that would be implemented if vibration levels approach the established vibration limits at a particular location. Potential contingencies may include one or more of the following:	Prior to issuance of demolition or grading permits	Applicant and/or Construction Supervisor/City of Cypress Director of Community Development Department, or designee			

Table 7.1: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
○ Lowering the height of the compaction weight; ○ Using a lighter compaction weight; or ○ Any other alternate method that is safe and appropriate, as determined by the project geotechnical consultant, in consultation with the City's Director of Community Development (such as utilizing geopier stabilization instead of DDC). [1] • At a minimum, vibration during initial site preparation activities at the locations described above shall be monitored. The monitoring results may indicate the need for more or less intensive measurements. When vibration levels approach the applicable limits established in the vibration monitoring and construction contingency plan, construction shall be suspended and the appropriate mitigation measures identified in the construction contingency plan shall be implemented to reduce vibration levels below thresholds.					
4.17: Transportation					
Mitigation Measure TRA-1: Truck Access & Routing Plan and Truck Signage and Striping Plan. The Applicant shall submit a Truck Access and Routing Plan to accommodate the circulation of trucks on site. Additionally, the Applicant shall prepare a Signage and Striping Plan, consistent with the provisions of the California Manual on Uniform Traffic Control Devices (CA MUTCD), that directs heavy trucks to the most appropriate access point. The Public Works Director of the City of Cypress, or designee, shall review and approve the Truck Access and Routing Plan and Signage and Striping Plan and confirm they have been incorporated into the project plans prior to the issuance of a building permit.	Prior to issuance of building permits	Applicant and City of Cypress Public Works Director, or designee			

[1] Utilizing a geopier stabilization system method is estimated to result in vibration levels of 0.22 at approximately 15 feet, which would ensure that vibration from construction within 10 feet remains lower than the threshold of 0.5 in/sec PPV for building damage.

Table 7.1: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
4.18: Tribal Cultural Resources					
Mitigation Measure TRC-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities. The project Applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation). The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/ definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground- disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project Applicant/lead agency upon written request to the Tribe. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh Nation from a designated point of contact for the project Applicant/lead agency	Prior to ground disturbing activities	Applicant and City of Cypress Engineer, or designee			

Table 7.1: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh Nation to the project Applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh Nation TCRs. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh Nation monitor and/or Kizh Nation archaeologist. The Kizh Nation will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.					
Mitigation Measure TRC-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects. Native American human remains are defined in Public Resources Code 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section	During construction activities	Applicant and/or Construction Supervisor/City of Cypress Director of Community Development Department, or designee			

Table 7.1: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
5097.98 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh Nation determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh Nation monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).) Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.					
Mitigation Measure TCR-3 Procedures for Burials and Funerary Remains. As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a	During project construction	Applicant and/or Construction Supervisor/City of Cypress Director of Community Development Department, or designee			

Table 7.1: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
separate treatment plan shall be created. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. In the event preservation in place is not possible despite good faith efforts by the project Applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe					

Table 7.1: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measures and Mitigation Measures	Monitoring Milestone	Responsible Party Responsible for Monitoring	Verification of Compliance		
			Initials	Date	Remarks
and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.					

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8.0 LIST OF PREPARERS AND PERSONS CONSULTED

8.1 CITY OF CYPRESS

The following individuals from the City of Cypress were involved in the preparation of this EIR:

- Alicia Velasco, Director of Planning/Community Development

8.2 EIR PREPARERS

The following individuals were involved in the preparation of this Draft EIR. The nature of their involvement is summarized below.

8.2.1 LSA

The following individuals were involved in the preparation of this Draft EIR:

- Ryan Bensley, AICP, Principal in Charge
- Chris Jones, AICP, Project Manager
- Lynnea Palecki, Assistant, Environmental Planner
- Amy Fischer, Principal/Air Quality, Noise and Global Climate Change Specialist
- Bianca Martinez, Air Quality Specialist
- Ken Wilhelm, Principal/Transportation
- Debmalya Sinha, Principal/Transportation
- JT Stephens, Principal/Noise
- Matt Phillips, Graphics Technician
- Jason Thomas Graphics & GIS Specialist
- Mitchell Alexander, GIS Specialist
- Jessie Quigley, GIS Specialist
- Lauren Johnson, Senior Technical Editor
- Chantik Virgil, Senior Word Processor

8.3 TECHNICAL REPORT PREPARERS

The following individuals were involved in the preparation of the technical reports in support of this Draft EIR. The nature of their involvement is summarized below.

8.3.1 G3Soil Works

The following individuals were involved in the preparation of the *Geotechnical Investigation and Report Update, Proposed Goodman Commerce Center, 5665 and 5757 Plaza Drive, Cypress, California* (May 4, 2022) and the *Updated Earthwork Considerations Goodman Commerce Center Cypress Building 3, 5665 Plaza Drive Cypress, California* (August 25, 2023):

- Daniel J. Morikawa, P.E., Director of Engineering
- Steve E. Stricklen, CEO / Principal Geotechnical Engineer
- Erik C. Haaker, P.G., C.E.G. Senior Engineering Geologist

8.3.2 Stantec Consulting Services Inc.

The following individuals were involved in the preparation of the *Phase I Environmental Site Assessment – 5665 Plaza Drive Cypress, California* (September 3, 2021)*:*

- Alicia Jansen, Associate Scientist
- Brian Viggiano, PG, Senior Geologist
- Kevin Miskin, P.E. Senior Principal Engineer

8.3.3 Pacific Environmental Company

The following individuals were involved in the preparation of the *Asbestos Inspection Report 5665 Plaza Drive Cypress, California, 90630* (August 10, 2021):

- Michael Lyssy, Certified Asbestos Consultant

8.3.4 PBLA Engineering, Inc.

The following individuals were involved in the preparation of the *Water Quality Management Plan (PWQMP) GCC Cypress Building 3* (September 20, 2023):

- Steven D. Levisee, Engineer

8.3.5 Urban Crossroads

The following individuals were involved in the preparation of the Goodman Commerce Center *Traffic Impact Analysis* (November 2023):

- Aric Evatt, PTP, Principal
- Charlene So, P.E., Senior Associate

8.4 PROJECT APPLICANT/DEVELOPER

8.4.1 Goodman North America Management, LLC

The project Applicant/Developer was consulted during the preparation of this Draft EIR:

- Blair Dahl, Vice President Entitlements & Construction, Southwest Region, Goodman

8.5 PERSONS CONSULTED

8.5.1 Gabrieleño Band of Mission Indians – Kizh Nation

The following individuals were consulted during the preparation of this Draft EIR:

- Andrew Salas, Chairman

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FINAL
ENVIRONMENTAL IMPACT REPORT

5665 PLAZA DRIVE PROJECT

CYPRESS, CALIFORNIA

SCH NO. 2024040017

OCTOBER 2024

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1.0 INTRODUCTION

This document comprises the Final Environmental Impact Report (EIR) for the proposed 5665 Plaza Drive Project (proposed project). It is composed of comments received during the public review period, responses to those comments, and an Errata section that clarifies, amplifies, or makes minor modifications to the Draft EIR text. The Draft EIR and technical appendices are provided separately.

In compliance with Section 15201 of the State CEQA Guidelines, the City of Cypress (City) has provided opportunities for public participation in the environmental process. The City distributed a Notice of Preparation (NOP) on May 7, 2024, to the California State Clearinghouse, responsible agencies, and interested parties for a 30-day public review period. The NOP was circulated for review from May 7 to June 5, 2024. The State Clearinghouse (SCH) number for this EIR is SCH No. 2020069007. The City also made the NOP available on the City's website to inform agencies and the public about the proposed project and to solicit input on the scope of the Draft EIR. The NOP described the project and identified potential environmental impacts associated with project implementation. In addition, the City held a virtual Public Scoping Meeting on Tuesday, May 28, 2024, to present the proposed project and to solicit input from interested parties regarding environmental issues that the Draft PEIR should address. Appendix A of the Draft EIR contains a copy of the NOP, and comments received. Section 2.2.2, Issues Raised, of the Draft EIR identifies areas of concern raised in response to the NOP or at the scoping meeting.

The California Environmental Quality Act (CEQA) requires that a Draft EIR have a review period lasting at least 45 days for projects that have been submitted to the State Clearinghouse for review (State CEQA Guidelines, Section 150105(a)). As required by State CEQA Guidelines Section 15087, the City provided a public Notice of Availability (NOA) of the Draft EIR for the 5665 Plaza Drive Project at the same time it filed a Notice of Completion (NOC) with the State Clearinghouse. The Draft EIR was circulated for public review for a period of 45 days, from August 12, 2024, to September 27, 2024.

The City actively solicited comments on the Draft EIR. The City posted physical notices to various locations throughout the City. Additionally, the NOA was mailed to the last known names and addresses of agencies, organizations, and individuals who previously requested such notice in writing. The City also submitted the Draft EIR to the State Clearinghouse for distribution to, and review by, State agencies. The City made a copy of the Draft EIR available at the Cypress Civic Center by appointment. In addition, the City posted the Draft EIR and all technical appendices on the City's website.

Four comment letters were received on the Draft EIR during the public review period. The comments in the comment letter are included and responded to in this Final EIR. Comments that address environmental issues are responded to thoroughly. Comments that (1) do not address the adequacy or completeness of the Draft EIR; (2) do not raise environmental issues; or (3) do request the incorporation of additional information not relevant to environmental issues, do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines.

Section 15088 of the State CEQA Guidelines, Evaluation of and Response to Comments, states:

a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response. The lead agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.

b) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail, giving the reasons that specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.

c) The response to comments may take the form of a revision to the Draft EIR or may be a separate section in the final EIR. Where the response to comments makes important changes in the information contained in the text of the Draft EIR, the lead agency should either:

   1. Revise the text in the body of the EIR; or

   2. Include marginal notes showing that the information is revised in the responses to comments.

Information provided in this Final EIR clarifies, amplifies, or makes minor modifications to the Draft EIR. No significant changes have been made to the information contained in the Draft EIR as a result of the comments received on the Draft EIR, and no significant new information has been added that would require recirculation of the document pursuant to State CEQA Guidelines Section 15088.5. This Final EIR also includes an Errata section that clarifies and makes minor modifications to the Draft EIR as a result of comments received during the public review period.

1.1 INDEX OF COMMENTS RECEIVED

The following is an index list of the agencies and individuals that commented on the Draft EIR prior to the close of the public comment period. The comments received have been organized in a manner that facilitates finding a particular comment or set of comments. The comment letter received is coded with the number as shown in Table 1.A, below.

Table 1.A: Comments Received During the Public Comment Period

Comment Code	Signatory	Date
State and Regional		
S-1	California Department of Transportation (Caltrans) District 12	09/27/2024
S-2	South Coast Air Quality Management (South Coast AQMD)	09/27/2024
Local		
L-1	The City of Los Alamitos	08/21/2024
Interested Parities		
IP-1	Paul Hastings, on behalf of Warland Investments Company and Affiliated Entities	09/27/2024

1.2 FORMAT OF RESPONSES TO COMMENTS

The following pages provide responses to the coded comment letter. The comment code number is provided in the upper right corner of the comment letter, and individual comments within the letter are numbered along the right-hand margin of the letter. The City's responses to the comment letter immediately follow each letter and are referenced by the index numbers in the margins.

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2.0 RESPONSES TO COMMENTS

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2.1 STATE AND REGIONAL AGENCIES

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California Department of Transportation

PLAZADISTRICT 12
1750 East 4th Street, Suite 100 | SANTA ANA, CA 92705
(657) 328-6000 | FAX (657) 328-6522 TTY 711
https://dot.ca.gov/caltrans-near-me/district-12

September 27, 2024

Ms. Alicia Velasco
Planner Director
City of Cypress
5275 Orange Avenue
Cypress, CA. 90630

File: LDR/CEQA
SCH: 2024040017
12-ORA-2024-02631
I-605, PM: R1.441
SR 22, PM: R0.927
I–405, PM 20.551
SR 39, PM 10.657

Dear Ms. Velasco,

Thank you for including the California Department of Transportation (Caltrans) in the review of the Draft Environmental Impact Report (DEIR) for the 5665 Plaza Drive Project. The proposed project will be constructed on an approximately 8.53 acre site located at 5665 Plaza Drive in the City of Cypress. The project includes demolition of the existing five-story office building on the project site and the construction of a new light industrial building totaling approximately 191,394 sf in size. The project site is currently developed with an approximately 150,626 sf, five-story, office building and surface parking lot. The existing building would be demolished and replaced with a new warehouse building including 181,061 sf of warehouse space and 10,333 sf of office space. The building would be one-story and a maximum of approximately 51 feet, 6 inches to the top of the parapet. The proposed building would include a truck loading area with 25 dock-high loading doors on the west side of the building and the installation of new westernmost driveway. S-1-1

The project site is in the southern part of the City of Cypress, which is in northwestern Orange County, California. The project site is north of the intersection of Plaza Drive and Douglas Drive. Local access to the project site is provided by Plaza Drive. The project site is approximately 2.75 miles east of Interstate 605 (I-605), and approximately 2.2 miles north of State Route 22 (SR-22). Access to the site can also be attained by State Route 39 (SR 39) and Interstate 405 (I-405).
State Routes 22 and 39 as well as Interstates 605 and 405 are owned and operated by Caltrans. Therefore, Caltrans is a responsible agency on this project, and has the following comments:

1. Caltrans encourages the design of Complete Streets that include high-quality pedestrian, bicycle, and transit facilities that are safe and comfortable for users of all ages and abilities. Improvements may include providing secure bicycle parking, pedestrian-oriented LED lighting, and comfortable connections to nearby active transportation and/or transit facilities. Complete Streets improvements also promote regional connectivity, improve air quality, reduce congestion, promote improved first-/last-mile connections, and increase safety for all modes of transportation. S-1-2

2. Consider adding one pedestrian scale lighting at the southern edge of the project limits on Plaza Drive, at the end of the pedestrian facility, to improve pedestrian safety. S-1-3

3. Consider providing secure bicycle parking facilities. Refer to APBP's Essentials of Bike Parking guide for bicycle parking best practices. (https://www.apbp.org/assets/docs/EssentialsofBikeParking_FINA.pdf) S-1-4

Caltrans' mission is to provide a safe and reliable transportation network that serves all people and respects the environment. Please continue to coordinate with Caltrans for any future developments that could potentially impact State transportation facilities. If you have any questions, please do not hesitate to contact Julie Lugaro at Julie.lugaro@dot.ca.gov. S-1-5

Sincerely,

Julie Lugaro
Julie Lugaro (Sep 26, 2024 15:34 PDT)

Julie Lugaro for
Scott Shelley
Branch Chief,
LDR-Climate Change-Transit Planning
Caltrans, District 12

2.1.1 CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS) DISTRICT 12

Letter Code: S-1

Date: August 21, 2024

Response to Comment S-1-1

This comment provides introductory remarks and summarizes the proposed project.

The City of Cypress acknowledges this comment. Because the comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR, no further response is required.

Response to Comment S-1-2

The commenter states that they encourage the design of Complete Streets that include high-quality pedestrian, bicycle, and transit facilities that are safe and comfortable for users of all ages and abilities. The commenter also notes that Improvements may include providing secure bicycle parking, pedestrian-oriented LED lighting, and comfortable connections to nearby active transportation and/or transit facilities.

The City acknowledges this comment. The proposed project would develop a new light industrial building. Excluding the relocation of the existing driveway locations, the proposed project would not include any changes to the City's existing transit, roadway, bicycle, or pedestrian infrastructure necessitating incorporation of "Complete Streets" design elements. As described in Draft EIR Section 4.7, Transportation, the proposed project would comply with City of Cypress General Plan policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. General Plan Policies CIR-2.5 and CIR-2.8 encourage the development of adequate sidewalks, particularly to provide connections to surrounding alternative modes of transportation. The project site currently provides sidewalks along Plaza Drive and Walker Drive allowing for pedestrian connections to nearby transit and bicycle infrastructure on Katella Avenue. The proposed project would not affect the existing sidewalks. The proposed project would include bicycle parking consistent with the requirements of the California Green Building Standards Code (CALGreen Code) (Cal. Code Regs tit. 24, pt. 11).

Response to Comment S-1-3

The commenter encourages the addition of one pedestrian scale lighting at the southern edge of the project limits on Plaza Drive, at the end of the pedestrian facility, to improve pedestrian safety.

The City acknowledges this comment. As discussed in Section 4.1, Aesthetics, in the Initial Study, (Appendix B), the proposed project would include lighting that would be distributed throughout the project site. A mix of lighting would be used to balance both safety lighting and ambient/enhanced lighting throughout the site. Exterior lighting associated with the proposed project would be implemented in conformance with the exterior lighting requirements in Section M of the McDonnell Specific Plan and the City's Lighting Standards 3.11.060, Exterior Lighting, and Section 3.10.060, Light and Glare, of the City's Zoning Ordinance.

Response to Comment S-1-4

The commenter encourages the proposed project to provide secure bicycle parking facilities as described in the APBP's Essentials of Bike Parking guide for bicycle parking best practice. The commenter also provides a link to these guidelines.

The City acknowledges this comment. As discussed in Response to Comment S-1-2, the proposed project would include bicycle parking consistent with the requirements of the California Green Building Standards Code (CALGreen Code) (Cal. Code Regs tit. 24, pt. 11).

Response to Comment S-1-5

This comment provides concluding remarks and contact information.

The City acknowledges this comment and looks forward to future communications with Caltrans.

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIAE-MAIL:
avelasco@cypressca.org
Alicia Velasco, Planning Director
City of Cypress
5275 Orange Avenue
Cypress, CA 90630

September 27, 2024

Notice of Availability of a Draft Environmental Impact Report for the 5665 Plaza Drive Project (Proposed Project) (SCH No.: 2024040017)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Cypress is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

South Coast AQMD Staff's Summary of Project Information in the Draft EIR

S-2-1

The Proposed Project includes demolishing an existing 150,626-square-foot five-story office building on the project site and constructing a new 191,394-square-foot light industrial building with 181,061 square feet of warehouse space and 10,333 square feet of office space.[1] Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residential development) is located 1398 feet in the north part of the Proposed Project site.[2] The construction of the Proposed Project is anticipated to occur over an 11-month duration, with construction beginning in November 2024 and completion expected in October 2025.[3] The project site is in the southern part of the city of Cypress at 5665 Plaza Drive, north of the intersection of Plaza Drive and Douglas Drive.[4]

South Coast AQMD Staff's Comments

Health Risk Assessment (HRA) during Project Operation

S-2-2

CEQA Guidelines Sections 15126.2 and 15126.4 require a Draft EIR to include a description of the significant environmental effects of a Proposed Project, significant environmental effects which cannot be avoided, significant irreversible environmental changes, growth-inducing impacts, and mitigation measures proposed to minimize the significant adverse impacts. An impact is considered significant under CEQA if it leads to a "substantial, or potentially substantial, adverse change in the environment." In addition to the air quality impacts from the criteria air pollutants and greenhouse

[1] Draft EIR, Page 49.
[2] *Ibid*, Page 108.
[3] *Ibid*, Page 108.
[4] *Ibid*, Page 45.

gases, the adverse air quality health risk impacts associated with increased emissions of toxic air contaminants (TACs) from all sources (including but not limited to expected future permitted stationary and portable sources, mobile sources, and other emission sources) during the operation phases need to be appropriately evaluated using qualitative and/or quantitative approaches to justify whether there will be potentially substantial adverse impacts.

However, the Draft EIR for the Proposed Project did not contain a comprehensive assessment of the health risk associated with mobile, stationary and portable sources during the operation phase. Please refer to the South Coast AQMD's guidance for performing a mobile source health risk assessment.[5] As a result, the potential cancer risk linked to the Proposed Project is unknown and undisclosed. This omission is concerning because the operation of a 181,061 square feet of warehouse space- using 100% cold storage and diesel-powered transportation refrigerated units (TRUs) is expected to involve various diesel-powered stationary and portable sources and vehicles that emit Diesel Particulate Matter (DPM), a known air toxic and carcinogen. S-2-3

As mentioned earlier in this letter, the aerial maps indicate that the nearest sensitive receptor, a residential area, is located within 1398 feet north of the Proposed Project site. As such, the Lead Agency is recommended to conduct an operational phase HRA, which should include evaluating truck emissions (including the truck routes to and from the site, truck loading/unloading docks, and their proximity to the sensitive receptors) and the impact of diesel-powered stationary and portable sources under the foreseeable probable future conditions. An HRA assessment is essential for determining the potential cancer risk impacts associated with the operation of the Proposed Project to the offsite sensitive receptors and workers so that they can be compared to the South Coast AQMD Air Quality Significance Thresholds for TACs[6] to determine whether there will be a potentially significant air quality impact. The analysis should also disclose the potential health risks for chronic and acute impacts of the Proposed Project's operation on residents living and/or workers working outside the Proposed Project's boundary in the Revised Draft EIR or Final EIR. S-2-4

We have raised this concern during both the Notice of Preparation (NOP) and Mitigated Negative Declaration (MND) phases of the Proposed Project. However, it has not been addressed in either phase.

Enhancing Emissions Mitigation: Adopting Cleaner Technologies and Addressing Truck Trip Discrepancies

Based on the CalEEMod modeling Tier 2 is used for all the construction equipment. However, Tier 4 engines are currently the cleanest technology for the off-road construction equipment. It is crucial to ensure that the levels of construction emissions, specifically NOx and PM_{10}, remain below significant thresholds during the construction period for each proposed individual project. Moving towards achieving this goal, where feasible, involves opting for higher Tier engines or electric emission-free engines instead of diesel-fueled engines for the construction equipment. This proactive choice not only aligns with environmental concerns but also demonstrates a commitment to S-2-5

[5] South Coast AQMD's guidance for performing a mobile source health risk assessment is available at: https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis

[6] South Coast AQMD Air Quality Significance Thresholds. https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf

minimizing the project's environmental footprints. The abatement of NOx can also be pursued by enforcing greener constructions, such as, limiting the usage of older engines in favor of adopting the latest available technologies, or even incorporating exhaust retrofits such as cutting-edge exhaust aftertreatment techniques. Additionally, several other resources to assist the Lead Agency with identifying additional potential mitigation measures for the Proposed Project are included in the South Coast AQMD's CEQA Air Quality Handbook[15] for both operational and construction emissions.

Moreover, according to Appendix C – CalEEMod work document, the truck trips used for the Refrigerated Warehouse-No Rail are estimated at 327 trips per day.[7] However, the calculated truck trips for the High-Cube Cold Storage warehouse are 342 trips per day in Appendix E, VMT analysis,[8] and the Draft EIR document. This discrepancy may result in underestimating truck emissions in the CalEEMod modeling. It is recommended that the lead agency correct this inconsistency across both documents to ensure accurate emissions calculations. S-2-6

South Coast AQMD Air Permits and Role as a Responsible Agency

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required. The final CEQA document, whether a MND or EIR, should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct,[9] Rule 203 – Permit to Operate,[10] Rule 401 – Visible Emissions,[11] Rule 402 – Nuisance,[12] Rule 403 – Fugitive Dust,[13] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[14] Rule 1113 – Architectural Coating,[15] Rule 1166 – VOC Contaminated Soil Excavation,[16] Rule 1179 – Publicly Owned Treatment Works Operation,[17] Regulation XIII – New Source Review,[18] Rule 1401 – Air S-2-7

[7] Appendix C – CalEEMod work document. Page 68.
[8] Appendix E, VMT analysis. Page 6.
[9] South Coast AQMD. Rule 201 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule 201.pdf
[10] South Coast AQMD. Rule 203 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[11] South Coast AQMD. Rule 401 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[12] South Coast AQMD. Rule 402 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[13] South Coast AQMD. Rule 403 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[14] South Coast AQMD. Rule 1110.2 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[15] South Coast AQMD. Rule 1113 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[16] South Coast AQMD. Rule 1166 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf
[17] South Coast AQMD. Rule 1179 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf
[18] South Coast AQMD. Regulation XIII available at https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii

Toxics,[19] Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,[20] Rule 1470 – Requirements for Stationary Diesel Fueled Internal Combustion and Other Compression Ignition Engines,[21] etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. South Coast AQMD is concerned that the project description and analysis in its current form in the MND is inadequate to be relied upon for this purpose. S-2-8

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at https://www.aqmd.gov/home/permits. S-2-9

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. S-2-10

[19] South Coast AQMD. Rule 1401 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf

[20] South Coast AQMD. Rule 1466 available https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf

[21] South Coast AQMD. Rule 1470 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov should you have any questions.

S-2-11

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW:SG
ORC240813-01
Control Number

2.1.2 South Coast Air Quality Management District (SCQAMD)

Letter Code : S-2

Date : September 27, 2024

Response to Comment S-2-1

This comment provides introductory remarks and summarizes the proposed project.

The City of Cypress acknowledges this comment. Because the comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR, no further response is required.

Response to Comment S-2-2

This comment summarizes the requirements of CEQA Guidelines Sections 15126.2 and 15126.4 and asserts that the Draft EIR should include an evaluation of the adverse air quality health risk impacts associated with increased emissions of toxic air contaminants (TACs) during the operational phase of the proposed project.

The South Coast AQMD *CEQA Air Quality Handbook*[1] states that emissions of toxic air contaminants (TACs) are considered significant if a health risk assessment (HRA) shows an increased cancer risk of greater than 10 in 1 million. The California Office of Environmental Health Hazard Assessment (OEHHA) *Air Toxic Hot Spots Program Risk Assessment Guidelines*[2] has determined that long-term exposure to diesel exhaust particulates poses the highest cancer risk of any TAC it has evaluated. The California Air Resources Board (CARB) has also identified diesel particulate matter (DPM) emitted by off-road, diesel-fueled engines as a TAC.[3] As such, the TAC of concern with respect to the proposed project would be DPM associated with the use of diesel engines during project construction. For risk assessment procedures, the OEHHA has identified DPM as the surrogate for whole diesel exhaust. HRA analyses typically use particulate matter less than 10 microns in size (PM_{10}) emissions to represent DPM emissions, consistent with OEHHA guidance.

As shown in Table 4.1.7, Short Term Construction Emissions, and Table 4.1.8, Project Operational Emissions, of the Draft EIR, the proposed project's PM_{10} emissions would not exceed applicable South Coast AQMD thresholds. Construction emissions would generate peak emissions of 9.0 pounds per day, below the South Coast AQMD threshold of 150 pounds per day. Similarly, proposed project operations would result in total PM_{10} emissions of 4.9 pounds per day or a net total of 2.7

1 South Coast Air Quality Management District (South Coast AQMD). 2008. *Final Localized Significance Threshold Methodology.* July. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf (accessed October 3, 2024).

2 California Office of Environmental Health Hazard Assessment (OEHHA). 2015. *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*. March. Website: https://oehha ca.gov/air/air-toxics-hot-spots (accessed October 2, 2024).

3 California Air Resources Board (CARB). 2024. Non-Vehicular Diesel Engine Risk Assessment Guidance. Website: https://ww2.arb.ca.gov/sites/default/files/classic/ab2588/2024%20DICE%20Screening% 20Risk %20Guidelines.pdf (accessed October 2, 2024).

pounds per day, which is also well below the South Coast AQMD threshold. This indicates that significant mass emissions of PM_{10} would not occur. Therefore, the proposed project would not generate a substantial amount of DPM emissions from off-road equipment use or truck idling that would result in the generation of a substantial amount of TACs and a significant health risk would not occur. Furthermore, the nearest sensitive receptors are located approximately 1,398 feet from the project site, which is a sufficient distance for particulate matter to disperse prior to reaching the nearest sensitive receptor. Therefore, the proposed project would not expose sensitive receptors to substantial levels of TACs and a health risk assessment is not warranted.

Response to Comment S-2-3

This comment suggests that a comprehensive assessment of health risk associated with the proposed project should have been completed, since the operation of a 181,061 square feet of warehouse space- using 100% cold storage and diesel-powered transportation refrigerated units (TRUs) is expected to involve various diesel-powered stationary and portable sources and vehicles that emit Diesel Particulate Matter (DPM), a known air toxic and carcinogen. Additionally, the commenter notes that, without this assessment, "the potential cancer risk linked to the proposed project is unknown and undisclosed."

As discussed in Response to Comment S-2-2, Table 4.1.7, Short Term Construction Emissions, of the Draft EIR, indicates that PM_{10} emissions, which are a surrogate for TAC emissions during construction, would be 9.0 pounds per day. This is well below the South Coast AQMD threshold of 150 pounds per day. This indicates that there would be no significant mass emissions of PM_{10} during project construction resulting in a significant health risk. Additionally, as shown in Table 4.1.8, Project Operational Emissions, of the Draft EIR, once operational, the proposed project would produce a total of 4.9 pounds per day, or a net total of 2.7 pounds per day, of PM_{10} emissions of 4.9 pounds per day. This is also below the South Coast AQMD threshold of 150 pounds per day. This indicates that significant mass emissions of PM_{10} would not occur. As discussed on page 4.1-25 in Section 4.1, Air Quality, of the Draft EIR it was conservatively assumed that trucks of all sizes would have diesel-powered transportation refrigerated units (TRUs). As a conservative assumption, the TRUs were modeled to be operational for up to 15 minutes per day. This is a conservative estimation of operational time for TRUs, as it represents three-times the exceedance of CARB's anti-idling rules, which prohibit idling for more than 5 minutes. Moreover, truck operators will have access to plug-in power to operate the TRUs and will be incentivized to do so based on their own fuel costs and compliance with the Airborne Toxic Control Measure for In-Use Diesel-Fueled TRUs and TRU Generator Sets, and Facilities where TRUs Operate (TRU ATCM). However, to be conservative, the 15-minute runtime assumption does not take into account plugging into electric power sources. Additionally, as stated above operational emissions of the proposed be also well below the South Coast AQMD thresholds. As the proposed project would not generate a substantial amount of DPM emissions from off-road equipment use or truck idling, generation of a substantial amount of TACs would not occur and, significant health risks would not be anticipated. As discussed in Response to Comment S-2-2, the nearest sensitive receptors are located approximately 1,398 feet from the project site, which is a sufficient distance for particulate matter to disperse prior to reaching the nearest sensitive receptor. Therefore, the proposed project would not expose sensitive receptors to substantial levels of TACs and a health risk assessment is not warranted.

Response to Comment S-2-4

The commenter notes that a review of aerial photographs of the project site and surrounding area indicate that the nearest sensitive receptor, a residential area, is located 1,398 feet to the north. The commenter recommends that the Lead Agency prepare an operational phase HRA that includes an evaluation of truck emissions (including evaluation of the truck routes to and from the site, truck loading/unloading docks, and their proximity to the sensitive receptors) and the impact of diesel-powered stationary and portable sources under the foreseeable probable future conditions. The commenter notes the importance of an HRA and states that the analysis should disclose the potential health risks for chronic and acute impacts of the proposed project's operation on residents living and/or workers working outside the proposed project's boundary in the Final EIR. The commenter notes that comments on this issue were provided in response to the NOP and previously prepared IS/MND, stating that this has not been addressed in either phase.

The City acknowledges this comment. As discussed on pages 4.1-28 and 4.1-29 of Section 4.1, Air Quality, of the Draft EIR, a localized significance threshold (LST) analysis was prepared for the proposed project to evaluate potential ambient concentrations of pollutants to nearby sensitive receptors. Based on the South Coast AQMD's Final Localized Significance Threshold Methodology,[4] South Coast AQMD staff developed LSTs similar to the regional significance thresholds. These thresholds are based on the pounds of pollutant emitted per day by a project that would cause or contribute to adverse localized air quality impacts. Emissions were assumed to be uniformly distributed across a flat project site over an 8-hour workday. Receptor distances are measured in meters from the proposed project boundary. The same emissions estimated for regional significance thresholds should be compared to allowable emissions presented in the LST lookup tables for the source/receptor area closest to the proposed project. Based on the South Coast AQMD's Final Localized Significance Threshold Methodology, screening procedures are by design conservative; that is, the predicted impacts tend to overestimate the actual impacts. If the predicted impacts are acceptable using the LST approach presented, then a more detailed evaluation is not necessary. As identified in Table 4.1.9, Construction Localized Emissions, and Table 4.1.10, Operational Localized Emissions, of the Draft EIR, the proposed project's on-site maximum localized construction and operational emissions would be below the South Coast AQMD's localized significance thresholds.

The South Coast AQMD *CEQA Air Quality Handbook*[5] states that emissions of TACs are considered significant if an HRA shows that project emissions would result in an increased cancer risk of greater than 10 in 1 million. The California OEHHA's *Air Toxic Hot Spots Program Risk Assessment Guidelines*[6] has determined that long-term exposure to diesel exhaust particulates poses the highest cancer risk of any TAC it has evaluated. In addition, CARB has also identified DPM emitted by off-road, diesel-fueled engines emit DPM as a TAC.[7] As such, the TAC of concern would be DPM

4 South Coast Air Quality Management District (South Coast AQMD). 2008. *Final Localized Significance Threshold Methodology*. July. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2 (accessed October 2, 2024).

5 Ibid.

6 Ibid.

7 Ibid.

associated with the use of diesel engines during project construction. For health risk assessment procedures, the OEHHA specifies that the surrogate for whole diesel exhaust is DPM. HRA analyses typically use PM_{10} emissions to represent DPM emissions, consistent with OEHHA guidance. As shown in Table 4.1.7, Short-Term Regional Construction Emissions, of the Draft EIR, project construction would produce peak daily PM_{10} emissions of 9.0 pounds per day. This is well below the South Coast AQMD threshold of 150 pounds per day. This indicates that significant mass emissions of PM_{10} would not occur and there would be no resultant significant health risk. Additionally, as shown in Table 4.1.8, Project Operational Emissions, of the Draft EIR, proposed project operations would result in total PM_{10} emissions of 4.9 pounds per day or a net total of 2.7 pounds per day. This is also well below the South Coast AQMD threshold of 150 pounds per day, indicating that significant mass emissions of PM_{10} due to project operations would not occur. Therefore, the proposed project would not generate DPM emissions from off-road equipment use or truck idling that would result in the generation of a substantial amount of TACs and a significant health risk would not occur.

Response to Comment S-2-5

The commenter states that while the CalEEMod modeling Tier 2 is used for all the construction equipment, Tier 4 engines are currently the cleanest technology for the off-road construction equipment. The commenter explains the importance of keeping construction emissions, specifically NOx and PM10, below the established significance thresholds during the construction period for each proposed individual project and recommends using higher tier engines or electric emission-free engines instead of diesel-fueled engines for the construction equipment. The commentor provides a link in the footnotes to the South Coast AQMD's CEQA Air Quality Handbook.

The City acknowledges this comment. As discussed in Section 4.1, Air Quality, of the Draft EIR, the air quality analysis assumed the use of Tier 2 construction equipment because it is required by the California Air Resources Board (CARB) In-Use Off-Road Diesel Fueled Fleets Regulation. As such, the proposed project would be required to meet this CARB regulation by using a minimum standard of Tier 2 equipment or better. Tier 4 engines are currently the cleanest technology for off-road construction equipment. Accordingly, the use of Tier 2 engines in the air quality analysis represents a conservative assumption. As demonstrated in Table 4.1.7, Short-Term Regional Construction Emissions, of the Draft EIR, construction emissions for the proposed project analyzed using Tier 2 engines would not exceed the South Coast AQMD thresholds for construction emissions. This would result in a less than significant impact associated with a cumulatively considerable net increase of any criteria pollutant for which the Project region is in nonattainment under the applicable federal or State ambient air quality standards. Therefore, additional mitigation, such as the requirement to use Tier 4 equipment is not warranted.

Response to Comment S-2-6

The commenter notes that the estimated daily trips in Appendix C (327 trips per day) is not consistent with the projected daily trips in Appendix E (342 trips per day). The commenter also states that this discrepancy may result in underestimating truck emissions in the CalEEMod modeling and recommends this discrepancy be corrected in both documents.

The proposed project analysis is consistent with Table 1, Project Trip Generation, provided in the vehicle miles traveled (VMT) analysis, which identifies that the proposed project would generate a

total of 406 average daily trips (ADT), including 262 passenger vehicle trips, 50 two-axle truck trips, 16 three-axle truck trips, and 78 four-axle truck trips, which was included in the California Emissions Estimator Model (CalEEMod). As described on page 4.1-25 of the Draft EIR, to be conservative, the air quality analysis assumed that the four+-axle truck trips would travel approximately 40 miles. Therefore, separate CalEEMod model runs were conducted for the proposed project. One CalEEMod run evaluated operational vehicle and light duty truck trip emissions, which include 262 passenger vehicle trips, 50 two-axle truck trips, and 16 three-axle truck trips, for a combined total of 328 average daily trips. The other CalEEMod run evaluated the four+-axle truck trip emissions, which include the 78 four+-axle truck trips. The combined trip emissions from the model runs are consistent with the total trip generation identified in the VMT analysis. Therefore, the proposed project adequately incorporates all vehicle and truck trips associated with the proposed project.

Response to Comment S-2-7

The commenter states that if the proposed project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD would be required.

The commenter identifies several AQMD rules that the proposed project may be required to comply with and states that a discussion of the applicable rules should be included in the Final CEQA document.

The City acknowledges this comment. The proposed project would not include any stationary sources or operational equipment that would require permits. However, as discussed in Section 4.1, Air Quality, of the Draft EIR, the proposed project would comply with several South Coast AQMD rules. This includes Rule 402 – Nuisance, to prevent occurrences of public nuisances, Rule 403 – Fugitive Dust, to prevent Fugitive Dust, and Rule 1113 – Architectural Coating, to limit the amount of volatile organic compounds (VOCs) from architectural coatings and solvents. Section 4.1.2.4, Regional Regulations, in the Draft EIR also provides a discussion of the applicable AQMD rules for the proposed project.

Response to Comment S-2-8

The commenter outlines that CEQA Guidelines Section 15096 details the responsibilities of Responsible Agencies in assessing the adequacy of CEQA documents for project reviews and approvals. They note that if a CEQA document is deemed inadequate, further actions are required, potentially delaying the project. The South Coast AQMD expresses concern that the existing project description and analysis in the MND do not provide the necessary information for issuing air permits.

The City acknowledges this comment. The proposed project would not include any stationary sources or operational equipment that would require permits from South Coast AQMD. Please see Response to Comment S-2-7, above.

Response to Comment S-2-9

The comment states that the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide

the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the proposed project as this information would be relied upon as the basis for the permit conditions and emission limits for the air permit(s). The commenter provides contact information and a link to their Webpage for general permit information.

The City acknowledges this comment. The proposed project would not include any stationary sources or operational equipment that would require permits. Please see Response to Comment S-2-7, above.

Response to Comment S-2-10

The commenter requests that the Lead Agency provide written responses to all comments from South Coast AQMD at least 10 days prior to certifying the Final EIR, as required by California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b). Additionally, the commenter states that if the Lead Agency's position differs from the recommendations in the comment letter, they must provide detailed reasons supported by substantial evidence explaining why specific comments and suggestions are not accepted.

The City acknowledges this comment.

Response to Comments S-2-11

This comment provides concluding remarks and contact information.

The City acknowledges this comment and looks forward to future communications with the South Coast AQMD.

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2.2 LOCAL AGENCIES

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CITY OF
Los Alamitos
California

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Los Alamitos, CA 90720-5600
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L-1

August 21, 2024

Alicia Velasco
Planning Director
City of Cypress
5275 Orange Avenue
Cypress, CA 90603
741-229-6720
avelasco@cypressca.org

SUBJECT: RESPONSE TO NOTICE OF AVAILABILITY FOR DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE WAREHOUSE PROJECT AT 5665 PLAZA DRIVE

Dear Director Velasco:

Thank you for the opportunity to provide comments on the Notice of Availability 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 project's potential impacts on our adjacent community, especially noise, air quality, and roadway impacts. We originally sent the following comments on the NOP for your consideration, and our City's Traffic Engineer has added further comments below after reading the draft EIR.

Traffic

L-1-1

The methodology used is in conformance with the industry standard. However, our Traffic Engineer noted two or three versions of the study impact; the latest is February 2024. The following is based on the City of Cypress Website.

The current site includes a total of 390,268 square feet of mixed warehouse and general office buildings. The proposed project will replace 150,626 square feet of office space with 181,061 square feet of High-Cubed Cold Storage Warehouse and 10,333 square feet of office space. The existing warehouse building will remain according to the latest site plan. (Different building sizes from various reports?)

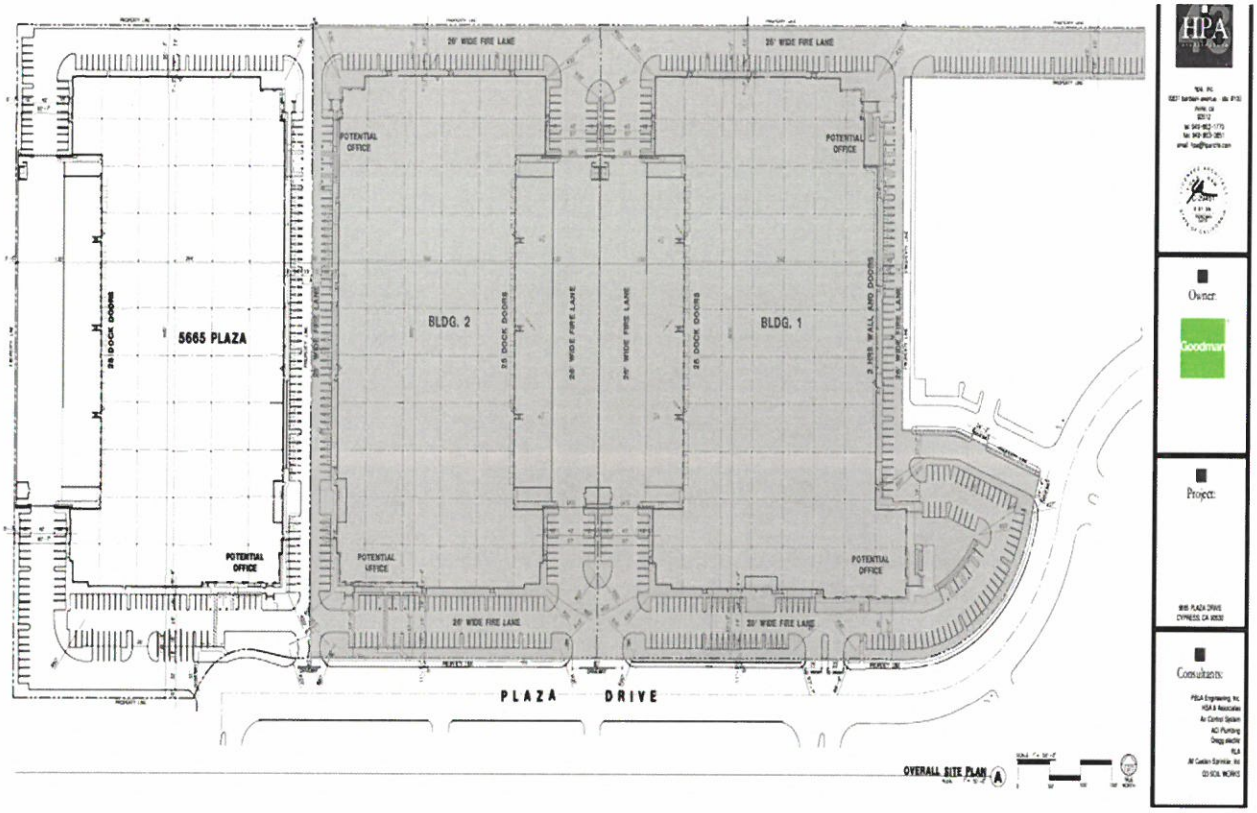


Table 4-2 presents the existing site trip generations.

TABLE 4-2: EXISTING TRIP GENERATION SUMMARY

Land Use	Quantity Units[1]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Actual Vehicles:								
Warehousing	248.623 TSF							
Passenger Cars:		30	7	37	9	29	38	276
2-axle Trucks:		0	0	0	1	0	1	26
3-axle Trucks:		0	1	1	1	1	2	32
4+-axle Trucks:		2	1	3	2	2	4	94
Total Truck Trips (Actual Vehicles):		2	2	4	4	3	7	152
Total Trips (Actual Vehicles)[2]		32	9	41	13	32	45	428
General Office	88.020 TSF	118	16	134	22	105	127	954
Passenger Cars		148	23	171	31	134	165	1,230
Trucks		2	2	4	4	3	7	152
Total Trips (Actual Vehicles)[2]		**150**	**25**	**175**	**35**	**137**	**172**	**1,382**

As shown in Table 4-2 the existing site generates 1,230 of passenger vehicles per day and 152 trucks per day.

L-1-1

Table 1 below presents the trip generation for the new development. It does not include the existing building to remain trip generations.

TABLE 1: PROJECT TRIP GENERATION

Land Use	Quantity Units[1]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Actual Vehicles:								
High-Cube Cold Storage Warehouse	191.394 TSF							
Passenger Cars:		15	1	16	4	14	18	262
2-axle Trucks:		1	1	2	1	1	2	50
3-axle Trucks:		0	0	0	0	0	0	16
4+-axle Trucks:		1	2	3	2	2	4	78
Total Truck Trips (Actual Vehicles):		2	3	5	3	3	6	144
Total Trips (Actual Vehicles)[2]		**17**	**4**	**21**	**7**	**17**	**24**	**406**

Based on the City's Traffic Engineer's review and evaluation, he has questions with the TIA indication of the project size and truck trip generation differences between what is existing and the proposed project. The estimated truck trips distribution indicates 50% of trucks go west on Katella Avenue through the City of Los Alamitos. The City of Cypress needs to clarify the net additional trucks generated by this development. L-1-1

Thank you again for the opportunity to provide comments on the DEIR for the 5665 Plaza Drive warehouse project. If you have any questions regarding the City's comments, please contact Tom Oliver, Associate Planner, at toliver@cityoflosalamitos.org or 562-431-3538 ext. 303.

Sincerely,

R. Noda

Ron Noda
Deputy City Manager/Development Service Director

2.2.1 City of Los Alamitos

Letter Code: L-1
Date: August 21, 2024

Response to Comment L-1-1

The Commenter states that they are concerned regarding the proposed project's potential noise, air quality, and roadway impacts on the adjacent community of Los Alamitos. The commentor also stated that they provided comments in the NOP.

The City of Cypress acknowledges this comment and thanks the City of Los Alamitos for their comment.

2.3 INTERESTED PARTIES

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IP-1

PAUL HASTINGS

September 27, 2024

VIA E-MAIL (*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 Draft Environmental Impact Report for 5665 Plaza Drive, Cypress, California
Cal. Code Regs. Tit. 14, §§ 15084, 15087 and 15088.5

Dear Ms. Velasco:

This firm, together with Garrett Stiepel Ryder LLP ("**Garrett**"), 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 City, including the Warland Cypress Business Center, the Warland Business Park, and Cypress Plaza. Warland is the largest landowner within the Cypress Business Center by a significant margin. Warland's holdings include over thirty properties located in the Cypress Business Center, the closest of which is within approximately 650 feet of 5665 Plaza Drive (hereinafter referred to as "**5665 Plaza**"), the redevelopment of which is the subject matter of the Draft Environmental Impact Report ("**DEIR**") prepared for the 5665 Plaza project.

IP-1-1

The City circulated the DEIR in connection with the redevelopment of 5665 Plaza, which project was initiated by GLC Cypress LLC ("**Goodman**"). The DEIR describes the proposed project as the demolition of an existing 150,626 square foot five-story office building and the construction of a new 191,394 square foot light industrial building with 181,061 square feet of warehouse space, and 10,333 square feet of office space (the "**Project**"). Although the Project is described as light industrial, it appears to be primarily a warehouse development. The proposed Project includes a proposed amendment to the McDonnell Specific Plan to allow light industrial uses within the eastern portion of Planning Area 1 and the removal of the maximum developable area requirement. The proposed Project also includes a lot line adjustment between 5665 Plaza and 5757 Plaza Drive (hereinafter, "**5757 Plaza**") and the installation of a shared access road connecting the parcels.

As previously referenced in prior correspondence to you dated June 5, 2024, March 7, 2024, and September 11, 2023 from Warland's general counsel, the Garrett firm, attached hereto and incorporated

herein, the redevelopment of 5665 Plaza is not a standalone project. Rather, it is clear from materials previously published by the City with respect to both the redevelopment of 5665 Plaza and the redevelopment of 5757 Plaza, which is located immediately adjacent to 5665 Plaza and commonly known as "Goodman Commerce Center Cypress," that 5665 Plaza and 5757 Plaza will operate as a single project. 5665 Plaza and 5757 Plaza were purchased by Goodman on the same day as part of the same transaction, with the intent of developing both properties as a single, approximately 600,000 square foot 3-building logistics center with 75 dock doors. Notwithstanding (a) the City's receipt of written notices from Garrett and others alerting the City as to this issue, (b) the fact that the cumulative site plan published on the City's own website, the first page of which is attached hereto as Schedule 1, depicts 5665 Plaza and 5757 Plaza as a single project, and (c) the numerous, nearly identical Goodman logistics centers located throughout California, the City has consistently failed to meet its obligations as the Lead Agency under CEQA to accurately define the entirety of the project under any of the environmental reports prepared with respect to either 5757 Plaza or 5665 Plaza (including, without limitation, the DEIR), and/or to properly evaluate the cumulative environmental impacts of the overall project (including, without limitation, in connection with the DEIR). Instead, the City elected to piecemeal the overall project in violation of CEQA and obtained City Council approval of the 5757 Plaza redevelopment mere months before the application for the 5665 Plaza redevelopment was submitted. Even if the City was somehow ignorant of Goodman's machinations, which seems unlikely, rather than alert the City Council or the City residents of the City's critical error in submitting the 5757 Plaza redevelopment for approval without the required diligence, the City has instead elected to continue its efforts to actively mislead both City Council and the public in preparing both the IS/MND and the subsequent DEIR for the 5665 Plaza redevelopment by inaccurately defining 5665 Plaza as a standalone project – even though the City is, by now, well-aware that doing so is misleading. In fact, the City's actions suggest that it desires to intentionally obscure the true nature of the overall project from interested parties – including the City Council members, the residents, the business owners, the workers, and their families.

IP-1-2

As previously advised, Warland engaged experts, including an environmental consultant, EcoTierra Consulting, and transportation consultant, Ganddini Group, to carefully review the DEIR prepared by the City in connection with 5665 Plaza. Copies of the results of such peer reviews identifying deficiencies in the DEIR are enclosed for your information. As you will note, both consultants identified critical errors in the DEIR, rendering the conclusions therein invalid. Given the significance of the errors identified, both consultants advised that a revised DEIR, with those errors corrected, must be circulated again for the required public review period in order to give the public an opportunity to understand the true and actual impacts of the Project. Failing to do so will render any approval of the proposed Project vulnerable to a costly and lengthy litigation process, which may be necessary in light of the gravity of the flaws in the DEIR analyses.

IP-1-3

The information presented below summarizes the detailed analysis in the consultants' reports, all of which must be responded to by the City's consultant.

A. Peer Review of the Draft Environmental Impact Report prepared for the 5665 Plaza Drive Project by the City of Cypress dated September 27, 2024 from EcoTierra Consulting

- Notes the DEIR fails to correctly identify the nearest sensitive receptor sites in several respects, including, critically, with respect to Air Quality, and that the DEIR must be revised to reflect potential impacts to the nearest sensitive receptors and recirculated to provide the public an opportunity to review and comment on the assessment. IP-1-4

- Notes the DEIR fails to assess potential health risks associated with the concentrated operation of diesel-fueled trucks on the Project site. It further notes that, despite the fact the Project can be reasonably characterized as a warehouse/distribution center since it would involve high levels of truck idling and truck movements, the DEIR provides no analysis or other substantial evidence that emissions from diesel truck operations on-site would not expose sensitive receptors to substantial pollutant concentrations. IP-1-5

    - An operational health risk assessment that evaluates the potential health risks to sensitive receptors located in the vicinity of the Project resulting from the operation of diesel-fueled trucks on the Project site must be performed, and the DEIR must be revised to reflect this analysis and recirculated to the public for review and comment on the City's justification for the conclusion of Less than Significant Impact with respect to exposing sensitive receptors to substantial pollutant concentrations. IP1-6

    - Notes the fact that this issue was raised during the EIR scoping process, which makes it incumbent on the Lead Agency (i.e., the City) to document that Diesel Particulate Matter ("**DPM**") emissions resulting from Project operations would not represent a risk to public health. IP1-7

- Notes that 5757 Plaza would constitute an additional source of DPM emitted by trucks and truck refrigeration units and that the DPM is the Toxic Air Contaminant (TAC) most associated with warehousing uses. Notes further that the DEIR fails to include a cumulative operational health risk assessment encompassing emissions from both 5665 Plaza and 5757 Plaza to assess the potential cumulative health risks resulting from the operation of the warehouse projects located immediately adjacent to one another. As such, the DEIR must be revised to reflect the cumulative operational health risk assessment and recirculated to the public for review and IP-1-8

comment on the City's justification for the conclusion of Less Than Significant Impact to exposing sensitive receptors to substantial cumulative pollutant concentrations. IP-1-8

- Notes that the DEIR fails to assess potential health risks associated with the operation of diesel fuel trucks that are off-site, travelling to and from the Project site, and the trucks accessing Valley View, located adjacent to numerous residential neighborhoods and the Frank Vessels Elementary School. The DEIR must be revised to reflect the results of this analysis and recirculated to provide the public an opportunity to review and comment on the City's justification for the conclusion of Less Than Significant Impact with respect to exposing sensitive receptors to substantial pollutant concentrations resulting from diesel fuel trucks travelling to and from the Project site. IP-1-9

- Notes the DEIR fails to identify adverse impacts to protected trees since the potential work activities that could impact street trees were not identified and their associated impacts were not analyzed. The DEIR must be revised to reflect better context and the results of an actual analysis, and recirculated to provide the public an opportunity to review and comment on the City's justification for the conclusion of Less Than Significant Impact with respect to conflict with local policies or ordinances protecting biological resources. IP-1-10

- Notes the discussion in the DEIR merely states, without analysis or evidence, that the Project would not conflict with the stated goals of the SCAG 2020-2045 RTP/SCS related to Greenhouse Gas (GHG) Reduction Plans, and fails to take into consideration the City of Los Alamitos. The DEIR must be revised to analyze the consistency of the Project with all relevant goals and policies of the RTP/SCS related to reduction of GHG emissions and recirculated to provide the public an opportunity to review and comment on the City's justification for the conclusion of Less Than Significant Impact with respect to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. IP-1-11

- Notes the DEIR incorrectly characterized the existing noise environment and improperly calculated the impacts of construction noise at 5665 Plaza. Further notes that the noise measurement locations used in the DEIR do not consider the noise impact at critically affected sensitive receptors (i.e., schools, medical centers, and residential communities).[1] The DEIR IP-1-12

[1] This calls into question whether the measurement locations were deliberately chosen in a way that appears to minimize the resulting noise impact, especially considering the fact that Cypress is primarily a residential city rather than an industrial park.

must be revised to correctly reflect the construction noise impacts and re-circulated in accordance with CEQA Guidelines Section 15088(a)(1). IP-1-12

- Notes the DEIR fails to identify the route that will be utilized by haul trucks during construction and does not assess the impacts of hauling activity to nearby residential neighborhoods and other sensitive receptor sites, including the Frank Vessels Elementary School. The DEIR must be revised to accurately reflect the potential impacts of hauling activity on the nearest sensitive receptors and recirculated to provide the public an opportunity to review and comment on the assessment. IP-1-13

- Notes that the vibration impacts of Deep Dynamic Compaction ("**DDC**") are inconsistently addressed in the DEIR, and that considerable additional details regarding the parameters and locations where DDC is to take place is necessary to understand the precise potential impacts of DDC on neighboring buildings and property. The DEIR must be revised to confirm whether DDC will be used during construction and to provide the required additional details. IP-1-14

    - Further notes that the DEIR fails to provide proper analyses of potential impacts on human annoyance from, or the noise impacts of, DCC at the Project. The DEIR must be modified to include such analyses. IP-1-15

B. Transportation Analysis Peer Review for the 5665 Plaza Drive Project in the City of Cypress (Project No. 19722) dated September 20, 2024 from Ganddini Group, Inc.

- Notes the 5665 Plaza Drive Project and the adjacent Goodman Commerce Center project (i.e., 5757 Plaza) have similar uses by the same applicant/project proponent. An additional note is that consideration of two projects as one large distribution center would have a greater impact than the two separate projects, warranting a larger area study per the City's Traffic Study Guidelines. The consultant concluded that it appears the projects may have been "piecemealed" to avoid analysis of a single, larger project. IP-1-16

- Notes several instances in which the DEIR does not accurately describe or depict the existing and/or proposed conditions. Without limiting the generality of the foregoing, Comment 11 criticizes the inconsistences between the trip distribution patterns at 5665 Plaza and 5757 Plaza. IP-1-17

- Notes numerous instances in which the DEIR references outdated and unreliable sources and methodologies, fails to identify the source of certain assumptions made therein, and/or presents incorrect results or references its results inconsistently. Without limiting the generality of the foregoing, the DEIR relies on an outdated Traffic Analysis prepared by Urban Crossroads in IP1-18

November 2023, even though a more recent one was published by the City in January 2024. The DEIR must be revised and recirculated to address the latest version of the Traffic Analysis. IP-1-18

- Note the January 2024 Traffic Analysis shows truck turning templates that present a potential traffic hazard, so the revised DEIR must demonstrate that trucks can complete a specific truck-turn movement without causing the identified traffic hazard. IP-1-19

- Further, the City's scoping agreement set forth in Appendix 1.1 of the Traffic Analysis attached to the DEIR promises to provide a safety assessment in the study area[2], which would include a review of collision history, but no such safety assessment was included in the DEIR/Traffic Analysis. IP-1-20

- Notes that the City's Transportation Operational Assessment Guidelines and industry standards both require transportation analyses to use traffic counts that are less than a year old, but the DEIR uses traffic counts from 2022, which were taken when office occupancies were low. Further notes that the DEIR shows an adjustment of the 2022 traffic counts to estimate 2023 traffic counts, but the resulting traffic counts are both calculated and applied incorrectly. Ultimately, the DEIR should be revised to reflect new traffic counts taken in 2024. IP-1-21

- Notes that the environmental baseline VMT should correspond to the conditions at the time the environmental analysis is prepared, which is typically based on the date the Notice of Preparation was published (in this case, 2024). However, the DEIR uses as environmental baseline VMT year of 2020 without further explanation. IP-1-22

- Notes the DEIR contemplates only one potential use of the facility despite identifying no ultimate tenant.[3] Further notes that, absent conditions of approval or another mechanism to restrict other potential uses, the DEIR/Traffic Analysis underestimates the trip generation and total volumes for future conditions. Since the ultimate tenant(s) are not known, the DEIR/Traffic Analysis should be revised to accurately consider the trip generations for the "worst-case" potential tenants, which are identified in Comment 6. IP-1-23

  - Notably, these revisions would affect key assumptions regarding the Project's trip generation, which in turn affects the needs for further analysis and assumptions of the noise IP-1-24

[2] Per note above, the appropriate study area should include both 5665 Plaza and 5757 Plaza.
[3] *See* Comments 6 and 10. The report notes several examples of other high-cube warehouse uses that would generate significantly more AM and PM peak hour trips, requiring further analysis.

and greenhouse gas emissions impact analyses, which constitutes substantial new information requiring the DEIR to be revised and recirculated. IP-1-24

- Notes the VMT Calculation Worksheet attached to the DEIR was modified after the same was originally published by the City, without any change to the date of the previously published document, nor any indication that the document had been modified. This calls into question the accuracy of reports previously published in connection with the IS/MND for 5665 Plaza, but were ostensibly unchanged when published in connection with the DEIR. IP-1-25

    - This document further assumes a total employment number without documenting the original land use and conversion factors applied to determine such input. IP-1-26

C. CONCLUSION

As the Lead Agency under CEQA, the City has a responsibility to ensure the studies and methodologies used in preparing a DEIR are up to date and consistent with the City's own guidelines, Orange County guidelines, and industry standard practices. In light of the foregoing, the City must revise and recirculate the DEIR to fulfill its CEQA obligations, including, without limitation, by correcting the comments above and in the enclosed expert reports. IP-1-27

Warland hereby requests that the City cure the issues identified in the enclosed peer review reports. We must note that many of these issues were foreseeable in light of the improper piecemealing of the entire Goodman Commerce Center (i.e., 5665 Plaza and 5757 Plaza) and the failure to consider the foreseeable use of the overall project as a logistics center. Nevertheless, the City has an opportunity to correct these issues before Warland and others must explore their other options. As you know, as the Lead Agency, the City is responsible for following CEQA guidelines in its revised analysis and the City has a duty to be transparent with the community of Cypress when doing so. We strongly encourage you to proceed as required by CEQA and other applicable law. IP-1-28 IP-1-29

Warland reserves all rights and remedies associated with 5665 Plaza, 5757 Plaza (i.e., the current Goodman Commerce Center Cypress), the DEIR, the enclosed expert reports, and the analysis and conclusions presented therein. IP-1-30

We appreciate your time and consideration on these matters.

Sincerely yours,

Jeffrey S. Haber

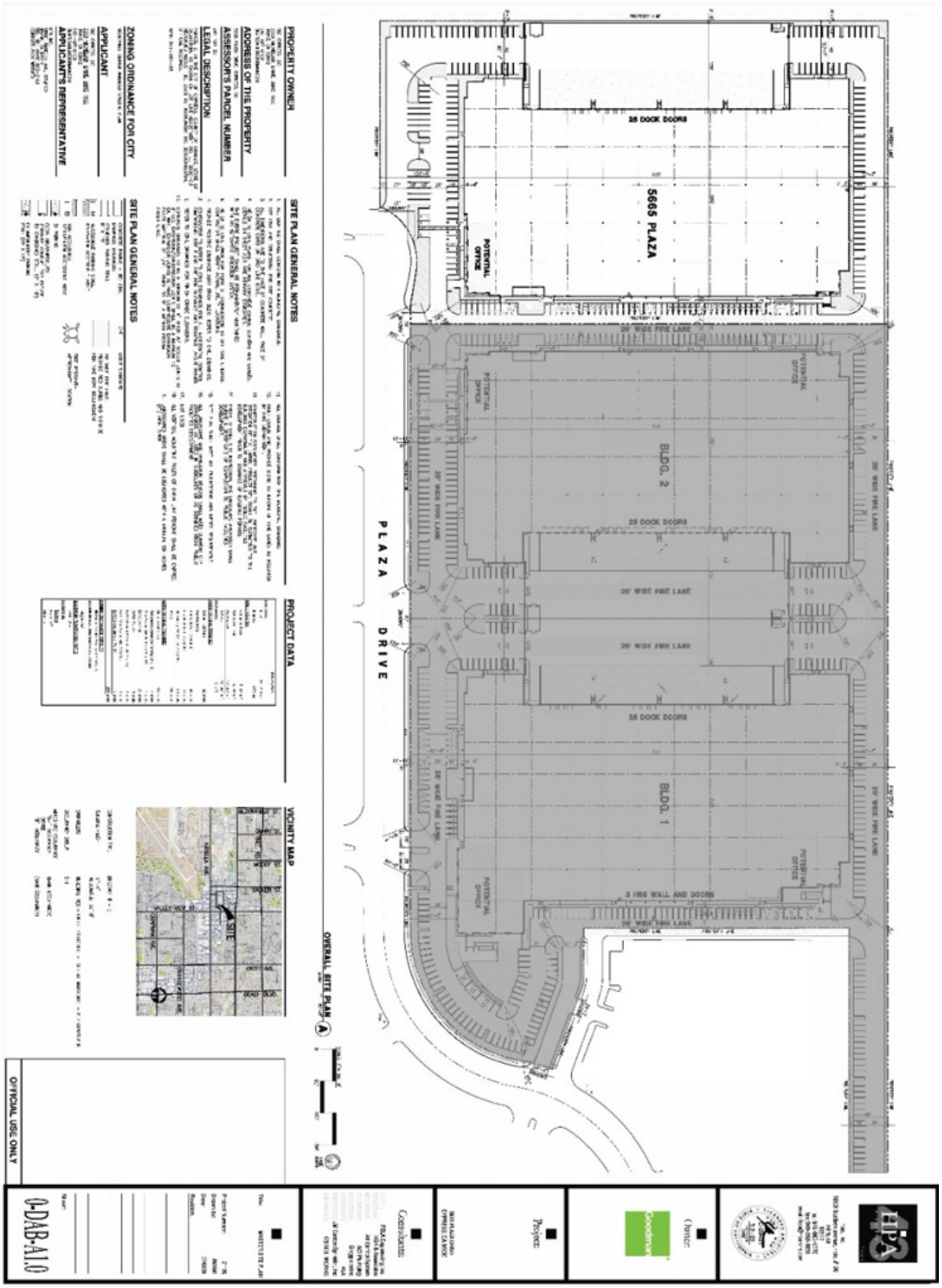
Jeffrey S. Haber,
of PAUL HASTINGS LLP

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)*
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)*
Allyssa J. Holcomb, Esq. *(via email)*
Lana H. Sammons, Esq. *(via email)*

Schedule 1

Cumulative Site Plan



EcoTierra Consulting, Inc. Peer Review of the Draft Environmental Impact Report for the 5665 Plaza Drive Project

EcoTierra consulting

September 27, 2024

Allyssa J. Holcomb
Garrett Stiepel Ryder LLP
3200 Bristol Street, Suite 850
Costa Mesa, California 92626

RE: Peer Review of the Draft Environmental Impact Report prepared for the 5665 Plaza Drive Project by the City of Cypress

Dear Ms. Holcomb:

As requested, **EcoTierra Consulting, Inc.** (EcoTierra) has conducted a peer review of the 5665 Plaza Drive Project Draft Environmental Impact Report (5665 Plaza Drive DEIR) and associated supporting documents, prepared by the City of Cypress, dated August 2024. Our review also encompassed relevant parts of the Initial Study/Mitigated Negative Declaration (IS/MND) and associated supporting documents prepared by the City of Cypress for the immediately adjacent Goodman Commerce Center project, located at 5757 Plaza Drive, dated March 2023 (Goodman Commerce Center IS/MND). Our review comments follow. IP-1-31

Air Quality

Sensitive Receptors

In its analysis of potential impacts to Air Quality, the 5665 Plaza Drive DEIR (page 4.1-20) identifies that the nearest sensitive receptors to the project site are the residential homes located 1,398 feet to the north. This statement is contradicted by the Goodman Commerce Center IS/MND, prepared for the project located on the immediately adjacent site, which states that the nearest sensitive receptor is a medical center located within 960 feet of that site (Goodman Commerce Center IS/MND, page 4.3-2). Due to the proximity of the 5665 Plaza Drive and Goodman Commerce Center sites, this receptor would also be the closest air quality sensitive receptor to the 5665 Plaza Drive project. The 5665 Plaza Drive DEIR must be revised to reflect potential impacts to this nearest sensitive receptor and re-circulated to provide the public an opportunity to review and comment on this assessment. IP-1-32

Health Risks Associated with Diesel Emissions from On-Site Truck Activity

In its analysis of potential impacts to Air Quality, the 5665 Plaza Drive DEIR, under Threshold AQ-3), (pages 4.1-28 and 4.1-29), assesses potential health risks associated with construction and operational emissions generated by the project, based on the South Coast Air Quality Management District (SCAQMD) Localized Significance Threshold (LST) methodology. However, the 5665 Plaza Drive DEIR fails to assess potential health risks associated with the concentrated operation of diesel-fueled trucks on the project site. The 5665 Plaza Drive DEIR identifies that the proposed building would include a truck loading area with 25 dock-high loading doors (page 3-16). It further states that the project would generate a total of 406 average daily trips (ADT), including 262 passenger vehicle trips, 50 two-axle truck trips, 16 three-axle truck trips, and 78 IP-1-33

four-axle truck trips. It was assumed that all trucks of all sizes accessing the project site would have transport refrigeration units (page 4.1-25).

Guidance promulgated by SCAQMD requires that operational health risk assessments be conducted for facilities that include the following activities that have the potential to generate high levels of diesel particulate matter (DPM) (emphasis added):[1]

- **Truck idling and movement (such as, but not limited to, truck stops, warehouse/distribution centers or transit centers)**,
- Ship hoteling at ports, and
- Train idling.

Because the project can reasonably be characterized as a warehouse/distribution center since it would involve high levels of truck idling and truck movements, the 5665 Plaza Drive DEIR must provide an operational health risk assessment that evaluates the potential health risks to sensitive receptors located in the vicinity of the project resulting from the operation of diesel-fueled trucks on the project site. Indeed, the 5665 Plaza Drive DEIR acknowledges (page 4.1-1) that the potential for logistics centers to contribute to excessive air pollution was raised during the scoping process. Yet the DEIR provides no analysis or other substantial evidence that emissions from diesel truck operations on-site would not expose sensitive receptors to substantial pollutant concentrations. As this concern was raised during the EIR scoping process, it is incumbent on the Lead Agency to document that DPM emissions resulting from project operations would not represent a risk to public health. The closest the DEIR comes to acknowledging this potential impact is a statement that Diesel Particulate Matter (DPM) is emitted by trucks and truck refrigeration units and that DPM is the Toxic Air Contaminant (TAC) most associated with warehousing uses. The DEIR goes on to state that the California Air Resources Board (CARB) Diesel Risk Reduction Plan is intended to substantially reduce diesel particulate matter emissions and associated health risks through introduction of ultra-low-sulfur diesel fuel and cleaner-burning diesel engines. However, the CARB Diesel Risk Reduction Plan is a long-term statewide program that does not address localized health risks to nearby sensitive receptors associated with DPM emissions at any specific project site, further indicating the need for an operational health risk assessment to be prepared for the 5665 Plaza Drive Project. This assessment must be conducted in accordance with SCAQMD and the State Office of Environmental Health Hazards Assessment (OEHHA) requirements. The 5665 Plaza Drive DEIR must be revised to reflect the results of this analysis and re-circulated to provide the public an opportunity to review and comment on the City's justification for the conclusion of Less Than Significant Impact with respect to exposing sensitive receptors to substantial pollutant concentrations.

IP-1-34

Moreover, the 5665 Plaza Drive Project would be located adjacent to Related Project 1 (Goodman Commerce Center, 5757 Plaza Drive and presently under construction, 5665 Plaza Drive Project

[1] South Coast Air Quality Management District, Mobile Source Toxics Analysis, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis, accessed April, 2024.

DEIR page 4-7 and Figure 3.2, page 3-7). This project would constitute an additional source of DPM TAC emissions that could expose sensitive receptors to substantial pollutant concentrations. Accordingly, a cumulative operational health risk assessment encompassing emissions from both the 5665 Plaza Drive project and Goodman Commerce Center project must be prepared to assess the potential cumulative health risks resulting from the operation of these two warehouse projects located immediately adjacent to one another. The Cumulative Impact analysis provided in Section 4.1.10 of the DEIR (page 4.1-30) does not address this potential impact. It incorrectly states that the only cumulative air quality impacts are those that occur across an air basin. The 5665 Plaza Drive DEIR must be revised to reflect the results of the cumulative operational health risk assessment and re-circulated to provide the public an opportunity to review and comment on the City's justification for the conclusion of Less Than Significant Impact with respect to exposing sensitive receptors to substantial cumulative pollutant concentrations. IP-1-35

Health Risks Associated with Off-Site Truck Activity

Similar to the above, 5665 Plaza Drive DEIR fails to assess potential health risks associated with the operation of diesel-fueled trucks travelling to and from the project site. Trucks accessing the project site from the north would likely use Valley View Street, which is located adjacent to numerous residential neighborhoods and the Frank Vessels Elementary School. The health risk assessment described above, along with the cumulative impact assessment which has not yet been completed in connection with the cumulative projects at 5665 Plaza Drive and 5757 Plaza Drive, must include receptor locations along Valley View Street in accordance with SCAQMD and OEHHA requirements. The 5665 Plaza Drive DEIR must be revised to reflect the results of this analysis and re-circulated to provide the public an opportunity to review and comment on the City's justification for the conclusion of Less Than Significant Impact with respect to exposing sensitive receptors to substantial pollutant concentrations. IP-1-36

Biological Resources

The 5665 Plaza Drive DEIR states that impacts to biological resources were considered but no adverse impacts were identified in the Initial Study (IS, Appendix B to the DEIR). In its analysis of the potential impacts to Biological Resources (IS, Appendix B to the DEIR, page 4.4-4), under Threshold e), the IS discusses the potential for impacts to protected trees. It states that there would be no impact to street trees as all work would be in accordance with the City's adopted Parkway Tree Policy (page 4.4-4). This conclusion is not supported by substantial evidence because the potential work activities that could impact street trees are not identified and their associated impacts are not analyzed. The 5665 Plaza Drive DEIR must be revised to provide better context and reflect the results of this analysis, and re-circulated to provide the public an opportunity to review and comment on the City's justification for the conclusion of Less Than Significant Impact with respect to conflict with local policies or ordinances protecting biological resources. IP-1-37

Greenhouse Gas Emissions

Conflict with GHG Reduction Plans

In its analysis of potential impacts related to Greenhouse Gas (GHG) Emissions (pages 4.5-20 and 4.5-21), the 5665 Plaza Drive DEIR includes an analysis of project consistency with the SCAG 2020-2045 RTP/SCS. This analysis does not include any discussion of the pertinent goals of the 2020-2045 RTP/SCS, which include, but are not limited to, how the project would reduce GHG emissions and improve air quality, or support regional goals to focus new development in areas served by transit. The discussion in the DEIR merely states, without analysis or evidence, that the project would not conflict with the stated goals of the RTP/SCS. The 5665 Plaza Drive DEIR must be revised to analyze the consistency of the project with all relevant goals and policies of the RTP/SCS related to reduction of GHG emissions and re-circulated to provide the public an opportunity to review and comment on the City's justification for the conclusion of Less Than Significant Impact with respect to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. IP-1-38

Furthermore, the DEIR states that the proposed project is not regionally significant per State CEQA Guidelines Section 15206 (DEIR, page 4.5-21), and as such, it would not conflict with the SCAG RTP/SCS targets since those targets were established and are applicable on a regional level. This statement is incorrect in that State CEQA Guidelines Section 15206(b)(2) also states that a regionally significant project includes a project that has the potential for causing significant effects on the environment the extending beyond the city of county in which the project is located. As indicated in the description of the scoping process in the DEIR includes concerns from the City of Los Alamitos regarding the potential impacts of the Project on Los Alamitos (DEIR, page 1-3). IP-1-39

Noise and Vibration

Sensitive Receptors

In its analysis of the potential impacts of construction noise on sensitive receptors, the 5665 Plaza Drive DEIR states that the nearest noise sensitive receptor to the project site is a hotel use located 1,300 feet to the southeast (page 4-6.16). This statement is contradicted by the Goodman Commerce Center IS/MND, prepared for the project located on the immediately adjacent site, which states that the nearest sensitive receptors are located 450 feet to the north and south of the Goodman Commerce Center site (Goodman Commerce Center IS/MND, page 4.13-14). Due to the proximity of the 5665 Plaza Drive and Goodman Commerce Center sites, these receptors would also be the closest sensitive receptors to the 5665 Plaza Drive project. The 5665 Plaza Drive DEIR must be revised to reflect potential impacts to the nearest sensitive receptors and re-circulated to provide the public an opportunity to review and comment on this assessment. IP-1-40

Construction Noise Impacts Improperly Calculated

In its analysis of the potential impacts of construction noise, the 5665 Plaza Drive DEIR states that the combination of the equipment during the site preparation and grading phases, would result IP-1-41

in a combined noise level of 59 dBA L_{eq} at a distance of 1,300 feet, which represents the distance from the center of construction activity at the project site to the nearest noise-sensitive hotel use (Courtyard by Marriott) to the southeast, based on a source level of 88 dBA L_{eq} at 50 feet (5665 Plaza Drive DEIR, Appendix G, page 8). The DEIR states that this noise level is less than the average daytime noise level measured to be approximately 61 dBA L_{eq}. The DEIR contends that combined construction and ambient noise level would create an increase of less than 3 dBA, the threshold at which the increase becomes perceptible in an outdoor environment. Therefore, the impact would be less than significant, per the DEIR.

However, the closest point from the edge of the project site (i.e., the location where the highest noise levels that would be experienced at the Courtyard by Marriott during construction of the project would be generated) to the nearest sensitive receptor is in fact approximately 1,015 feet. At this distance, noise levels of up to 61.9 dBA L_{eq} would occur at the Courtyard by Marriott. Moreover, according to the DEIR, the threshold of significance for construction noise impacts is "compliance with the City's Municipal Code" (DEIR, page 4,6-13). The City's Municipal Code establishes a maximum exterior noise level standard of 60 DBa L_{eq} (DEIR, Table 4.6.2, page 4.6-4) for activities lasting more than 30 minutes in an hour. As such, the DEIR analysis of construction noise incorrectly applies its own threshold. Moreover, as discussed below, the calculated construction noise levels incorrectly exclude specific construction activities. While this impact could be mitigated with installation of a temporary noise barrier at the edge of the construction site, no such mitigation measure is included in the DEIR. In accordance with CEQA Guidelines Section 15088(a)(1), identification of a new significant impact from the project after the Draft EIR has been circulated for public review represents significant new information requiring recirculation of the Draft EIR. Accordingly, the 5665 Plaza Drive DEIR must be revised to correctly reflect construction noise impacts and re-circulated in accordance with CEQA Guidelines Section 15088(a)(1).

IP-1-41

Existing Noise Environment Not Properly Characterized

In its analysis of Noise impacts, the 5665 Plaza Drive DEIR states that it includes long-term measurements at four locations (5665 Plaza Drive DEIR, page 4.6-7) located in the immediate vicinity of the project site. However, DEIR Table 4.6.5 and Figure 4.6-1 only show three locations. Because of the location of these three measurement sites, existing conditions at the nearest sensitive receptors (Courtyard by Marriott and residential uses to the north of the project site) are not accurately presented in the DEIR. Ambient noise levels at these locations are primarily influenced by vehicle traffic on Katella Avenue and Cerritos Avenue, respectively, which would not be captured at the measurement locations used in the DEIR and, if properly measured, could reflect lower ambient noise levels than are typically characteristic of the commercial area where the measurements were taken. Accordingly, the noise analysis presented in the DEIR does not accurately reflect the change in ambient noise levels at the most affected sensitive receptors that would result from construction of the project. The 5665 Plaza Drive DEIR must be revised to accurately reflect potential impacts at the nearest sensitive receptors and re-circulated to provide the public an opportunity to review and comment on this assessment.

IP-1-42

Haul Route Not Identified

The 5665 Plaza Drive DEIR identifies that approximately 960 cubic yards of soil would be exported by trucks during construction of the project (page 3-27). The haul route that these trucks would utilize to travel to and from the project site is not identified in the DEIR. As such, the change in the ambient noise environment resulting from haul truck activity is not correctly assessed in the DEIR. A haul truck can generate noise levels up to 84 dBA at 50 feet (DEIR, Table 4.6.6, page 4.6-15). Regardless of the specific route, haul trucks will likely pass by numerous residential neighborhoods and the Frank Vessels Elementary School. The 5665 Plaza Drive DEIR must be revised to accurately reflect potential impacts of hauling activity the nearest sensitive receptors and re-circulated to provide the public an opportunity to review and comment on this assessment. IP-1-43

Vibration Impact of Deep Dynamic Compaction Inconsistently Addressed

Appendix F to the DEIR (Geotechnical Evaluation) indicates that Deep Dynamic Compaction (DDC) could be employed to provide in-situ ground stabilization as an option to mitigate potential site soil liquefaction and provide acceptable support for the planned Building No. 3. DDC involves repetitive dropping of a 10-ton weight from a height of 60 feet to compress the underlying soils at a building site (DEIR, page 1-5). Potential use of this technique is first introduced in the Executive Summary description of Alternative 4 (Deep Dynamic Compaction and Stone Columns Alternative). It is not included in either the Executive Summary project description (DEIR, pages 1-1 and 1-2), Introduction (DEIR, page 2-1) or the DEIR description of Project Characteristics (DEIR, pages 3-15 through 3-27). Nonetheless, the DEIR implies that this technique will be employed for the project, although the first mention is on page 4.6-16. The DEIR further includes a three-paragraph analysis of the potential for DDC to result in damage to adjacent buildings and provides a mitigation measure (MM NOI-1, Construction Vibration Monitoring Plan) to address potential impacts on buildings from DDC). Impacts would be less than significant with mitigation. IP-1-44

Additionally, the analysis of Alternative 4 indicates that it is intended to "reduce vibratory impacts to sensitive receptors within the vicinity of the proposed project" (DEIR, page 5-18). The analysis of the vibration impacts of Alternative 4 indicates that the impacts of the alternative would be lower than the project (DEIR, page 5-21). However, because the areas in which DDC would take place under the project and Alternative 4 are not specified anywhere in the DEIR, it is unclear how Alternative 4 would reduce impacts compared to the project. Considerable additional details regarding the parameters and locations where DDC is to take place under both the project and the alternative needs to be provided in order for neighboring uses to understand what are the precise potential impacts of DDC on their buildings and property. IP-1-45

Vibration Impacts of DDC on Human Annoyance Not Addressed

The DEIR (page 4.6-12) includes a discussion of perception of vibration by humans. Whereas vibration levels that can potentially result in building damage are expressed in Peak Particle Velocity (PPV, inches/second), impacts related to human annoyance are expressed in Vibration Velocity Decibels (VdB). While the DEIR discusses this under Methodology (DEIR, page 4.6-12), no IP-1-46

analysis is provided as to the potential impacts on human annoyance from DDC. According to the Federal Transit Administration, a pile driver can generate typical vibration levels of 104 VdB, with an upper range of 112 VdB (Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual (2018), Table 7-4, page 184). The DEIR needs to be modified to include this analysis in order for residents and occupants to understand potential impacts on them that could result from DDC.

Noise Impacts of DDC Not Addressed

The DEIR does not include any analysis of the noise impacts of DDC. It simply provides one statement:

"During deep dynamic compaction activities, the major source of noise would be the crane utilized to drop the weight. Construction noise levels would be similar to those during building construction as that construction phase would also include the operation of a crane." (DEIR, page 4.6-16).

This statement is contradicted by information contained in the DEIR. Table 4.6.6 (DEIR, page 4.6-15) indicates that the source level for pile driving is 101 dBA. The source level for a crane is 85 dBA. Since DDC generates greater noise levels than standard pile driving, the source level for construction equipment during site preparation (DEIR, Appendix G, page 8) needs to be revised to reflect the correct equipment mix to be used during site preparation (i.e., dozer, tractor, crane and DDC) and the resulting noise levels at sensitive receptors need to be re-calculated to demonstrate their effects on sensitive receptors.

IP-1-47

Please feel free to contact me if you have any questions or require any additional information.

IP-1-48

Sincerely,
EcoTierra Consulting, Inc.



Craig Fajnor
Principal

EcoTierra consulting

EcoTierra Consulting, Inc. is an environmental consulting firm that assists public and private entities with implementation of the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). These two laws require public agencies to consider the potential environmental consequences of agency decisions by following processes and procedures set forth in state and federal law and regulation. These laws apply to agency-sponsored projects and to private development projects.

Craig Fajnor and Curtis Zacuto, the founding Principals of **EcoTierra**, have a total of over 60 years of experience in CEQA and NEPA report preparation. The founding Principals established the firm in July, 2010, after previously serving as the Senior Vice Presidents for a noted Southern California CEQA firm. **EcoTierra's** success is based upon the success of projects and the partnerships that **EcoTierra** builds with each client.

EcoTierra's professional staff brings a reliable combination of knowledge and experience to each project. **EcoTierra** staff's diverse project experience includes large and complex and controversial projects in the Los Angeles area and throughout the Southern California region, including:

- Industrial
- Commercial
- Institutional
- Single/Multi-Family Residential
- Mixed-Use
- Entertainment/Events
- Public Sector
- Subdivisions
- Urban In-fill
- Master Plans

EcoTierra staff's background in private and public sector planning has resulted in a comprehensive understanding of the complex relationships between land use regulations, environmental impact, and project implementation.

CRAIG FAJNOR / PRINCIPAL

Experience Summary

Mr. Craig Fajnor, Co-Founder and Principal of **EcoTierra Consulting, Inc.**, has 38 years of experience in environmental planning and project management. Mr. Fajnor has served in a senior management position at various consulting firms for over 18 years and operated an independent consulting practice for more than 13 years. Mr. Fajnor specializes in urban projects and has managed large and complex projects in Los Angeles and throughout the Southern California region, including EIRs for the Staples Center and Hollywood and Highland projects, and an EIR/EIS for the Los Angeles Air Force Base. Mr. Fajnor brings extensive hands-on experience in all forms of environmental documentation which may be needed to meet the requirements of the California Environmental Quality Act and the National Environmental Policy Act.

Education Background and Professional Affiliations

- M.A. in Planning – University of Virginia
- B.A. in Political Science – Duke University
- American Planning Association (APA)
- Former editor of The Dispatch, newsletter of the Los Angeles Section of APA

Project Experience

EIRs/EISs

- Anaheim Gateway Project (EIR)
- Ashland Chemical Distribution Center (EIR)
- Bradley Landfill and Recycling Center Master Plan (EIR)
- Chinatown Redevelopment Project (EIR Addendum)
- Downey Studios Mixed-Use Development Specific Plan (EIR)
- Grand Avenue Project (EIR Addendum)
- Harbor Gateway Center (EIR)
- Hollywood & Highland (EIR)
- Hollywood Redevelopment Plan (EIR)
- Hollywood and Vine (EIR Addendum
- Kinder-Morgan Tank Farm Projects (EIR)
- LAAFB Land Conveyance, Construction and Development Project (EIR/EIS)
- Metro Universal Project (EIR)
- North Hollywood Arts and Entertainment District (EIR/EIS)
- Olive Avenue Development Peer Review
- Playa Vista Phase I (EIR)
- Sepulveda/Rosecrans Site Rezoning and Plaza El Segundo Development (EIR)
- Santa Monica-UCLA Medical Center (EIR)
- Staples Center (EIR)
- UCLA University Village Expansion (EIR)
- Universal City Specific Plan (EIR)
- Wilshire Grand Redevelopment Plan (EIR)
- Vermont Corridor (EIR)

Initial Studies/MNDs/EAs

- California Hospital Medical Center Seismic Reconstruction (EA)
- Sunquest Business Park (EA)
- Wiseburn School District Reconstructions (MND)

Ganddini Group, Inc.
Transportation Analysis Peer Review
for the 5665 Plaza Drive Project

September 20, 2024

Ms. Allyssa Holcomb
GARRET STIEPEL RYDER LLP
3200 Bristol Street, Suite 850
Costa Meas, California 92626

RE: Transportation Analysis Peer Review for the 5665 Plaza Drive Project in the City of Cypress
Project No. 19722

Dear Ms. Holcomb:

Ganddini Group, Inc. is pleased to provide this peer review summary of the Transportation section of the Draft Environmental Impact Report (DEIR) and supporting technical documents for the 5665 Plaza Drive project in the City of Cypress. We have reviewed the following documents:

- Transportation Section of the DEIR (August 2024)
- Appendix E – *5665 Plaza Drive Project - Vehicle Miles Traveled Analysis* (LSA, December 15, 2023) ["VMT Analysis"]
- Appendix E – *Goodman Commerce Center Trip Generation Assessment* (Urban Crossroads, February 20, 2024) ["Trip Generation Assessment"]
- Appendix E – *Goodman Commerce Center Traffic Analysis* (Urban Crossroads, November 21, 2023) ["Traffic Analysis"]

We also reviewed the following document which is not contained in the DEIR but was provided for review:

- Updated *Goodman Commerce Center Traffic Analysis* (Urban Crossroads, January 11, 2024) ["Updated Traffic Analysis"]

IP-1-49

As described in the DEIR, Section 1.2 – Summary of Project Description, the proposed project involves demolition of an existing 150,626 square foot five-story office building and the construction of a new 191,394 square foot light industrial building with 181,061 square feet of warehouse space and 10,333 square feet of office space. The project also involves a Specific Plan Amendment to the McDonnel Center Specific Plan to allow light industrial uses within the eastern portion of Planning Area 1 and removal of the maximum developable area requirement.

LIMITATIONS ON REVIEW

This peer review focuses on whether the analysis was completed in accordance with industry practice for the region and to provide our opinion regarding the findings and recommendations. The methodologies and key input parameters of the technical analyses reviewed; however, detailed review of every calculation and typographical errors were not the focus of this review.

Ms. Allyssa Holcomb
GARRET STIEPEL RYDER LLP
September 20, 2024

GENERAL COMMENT REGARDING PROJECT DESCRIPTION

It is understood that the proposed 5665 Plaza Drive project and the adjacent Goodman Commerce Center project (5757 Plaza Drive) are similar uses by the same applicant/project proponent. Consideration of the proposed 5665 Plaza Drive and Goodman Commerce Center (5757 Plaza Drive) projects as one large distribution center complex would result in a greater project trip generation than evaluated in either project's environmental analysis, which in turn would contribute more than 25 peak hour trips through additional signalized intersections, thus warranting a larger study area per the City's Traffic Study Guidelines. Additionally, consideration of the two projects as one large distribution center complex would have a greater impact on the net change in volume-to-capacity, delay, and Level of Service operations than is disclosed by evaluation as two separate projects. Therefore, it appears the projects may have been "piecemealed" to avoid analysis of a single, larger project with greater potential to cause operational or Level of Service deficiencies. IP-1-50

COMMENTS ON TRANSPORTATION SECTION OF THE DEIR

COMMENT 1

Page 4.7-4, Section 4.7.3.1, the description of Douglas Drive incorrectly refers to proposed sidewalks along 5775 and 5885 on the north side of Douglas Drive. The proposed sidewalks will presumably be installed along 5775 and 5885 Plaza Drive on the north side of Plaza Drive. Walker Street is incorrectly described as undivided although there is a painted median with left turn lanes. These descriptions should be corrected so that the EIR accurately describes existing conditions. IP-1-51

COMMENT 2

Page 4.7-6, 2nd paragraph states that peak hour volume counts were conducted in 2022. According to the *City of Cypress Transportation Operational Assessment (Level-of-Service Traffic Study) Guidelines* (April 2023) ["Traffic Study Guidelines"], *"Any traffic counts utilized in the transportation analysis shall not be more than one year old without prior approval of the City Traffic Engineer."* This section of the DEIR further acknowledges low office occupancy at the time the traffic counts were collected.

To adjust for these shortcomings, the DEIR/Traffic Analysis states that the 2022 traffic volume counts were increased by 30 percent to account for low occupancy office uses and further increased by an additional two percent to adjust from 2022 to 2023; however, the traffic volumes shown on Exhibit 3-8 of the Traffic Analysis do not accurately reflect these adjustments. The following is an example of the calculations for the PM peak hour volumes that do not reflect the adjustments as claimed: IP-1-52

Intersection	PM Peak Hour Volumes												
	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	Total
Douglas St & Katella Ave													
Raw 2022 Count[1]	79	1	7	24	2	45	11	1,888	27	8	1,541	6	3,639
Low Office Occupancy Adjustment (+30%)	24	0	2	7	1	14	3	566	8	2	462	2	1,091
2022 -> 2023 Adjustment (+2%)	2	0	0	1	0	1	0	49	1	0	40	0	94
Adjusted 2023 Volume	105	1	9	32	3	60	14	2,503	36	10	2,043	8	4,824
Volume Shown in the Traffic Analysis[2]	83	1	7	26	2	47	11	1,963	32	9	1,608	6	3,795
Valley View St & Plaza Dr													
Raw 2022 Count[1]	4	1,894	4	16	1,455	23	79	0	28	51	9	116	3,679
Low Office Occupancy Adjustment (+30%)	1	568	1	5	437	7	24	0	8	15	3	35	1,104
2022 -> 2023 Adjustment (+2%)	0	49	0	0	38	1	2	0	1	1	0	3	95
Adjusted 2023 Volume	5	2,511	5	21	1,930	31	105	0	37	67	12	154	4,878
Volume Shown in the Traffic Analysis[2]	4	1,967	12	52	1,503	23	168	0	61	162	30	355	4,337

Notes:
Shaded values indicate movements that do not meet the low occupancy and growth factor adjustments as claimed.
1. Taken from Appendix 3.1 of the Traffic Analysis.
2. Taken from Exhibit 3-8 of the Traffic Analysis.

IP-1-52

Additionally, the adjusted 2023 should be even greater than shown in the above "Adjusted 2023 Volume" rows when accounting for passenger car equivalent (PCE) factors.

In summary, since existing volumes serve as the baseline for development of future scenarios and are one of the primary variables for determining existing and future Levels of Service, the Level of Service calculations presented in the DEIR are not accurately represented according to the study's own methodology. The DEIR/Traffic Analysis relies on a series of assumptions to estimate existing conditions that are inconsistent with the City guidelines and industry practice.

The DEIR/Traffic Analysis should be revised based on new traffic counts within the past year. As new traffic counts would re-establish the existing conditions baseline, this would constitute substantial new information and the EIR should be re-circulated.

COMMENT 3

Page 4.7-7, Section 4.7.3.4, states that the existing baseline VMT was established for year 2020 by interpolating between the OCTAM base (2016) and future (2045) models. The environmental baseline should correspond to conditions at the time the environmental analysis was prepared, typically based on the date of the Notice of Preparation (in this case, 2024). [1]

IP-1-53

COMMENT 4

Page 4.7-7, Table 4.7.2, the VMT per employee is incorrectly calculated as 24.81. According to the employment and VMT shown, then baseline VMT should be 24.08 VMT per employee (41,174,971 VMT / 1,710,147 employees = 24.08). Furthermore, the baseline VMT per employee shown in this section is inconsistent with the VMT Analysis in Appendix E.

IP-1-54

[1] Stevens and Antero (2016). Baseline and Environmental Setting. CEQA Portal Topic Paper, 6. Retrieved May 8, 2024 from https://ceqaportal.org/tp/Baseline%20and%20Environmental%20Setting%20Topic%20Paper%2008-23-16.pdf.

Ms. Allyssa Holcomb
GARRET STIEPEL RYDER LLP
September 20, 2024

COMMENT 5

Page 4.7-8, Section 4.7.4.1, the description of lane capacity assumptions are inconsistent with the Traffic Analysis in Appendix E. Additionally, the last paragraph states that intersection level of service (LOS) was performed based on the 6th Edition Highway Capacity Manual (HCM) methodology using the Synchro 10 software. According to the City's Traffic Study Guidelines, HCM calculations should be performed using the latest edition of the HCM (currently the 7th Edition) and the latest version of the Synchro software suite (currently version 12). IP-1-55

The DEIR/Traffic Analysis should be revised based on the latest HCM methodology and Synchro software requirements in accordance with the City's Traffic Study Guidelines. As such revisions would affect all existing and future Levels of Service, this would constitute substantial new information and the EIR should be re-circulated.

COMMENT 6

Pages 4.7-11/12, Section 4.7.6 states that trip generation estimates were derived from trip generation rates obtained from the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (11th Edition) for a High-Cube Cold Storage Warehouse (ITE Land Use Code 157); however, Section 3.6.4 Operational Characteristics of the DEIR states that the ultimate tenant has not been identified. While the Alternatives evaluation in Section 5.0 correctly notes that a "No Refrigeration Warehouse Alternative" would reduce the number of daily truck trips, there numerous other types of warehousing categories that would generate more peak hour and total daily trips (cars and trucks) compared to high-cube cold-storage warehousing, as summarized in the following table:

Land Use	Quantity	Trip Generation					
		AM Peak Hour		PM Peak Hour		Daily	
		Rate	Trips	Rate	Trips	Rate	Trips
High-Cube Fulfillment Center Warehouse (Non-Sort)	191.394 TSF	0.15	29	0.16	31	1.81	346
High-Cube Fulfillment Center Warehouse (Sort)	191.394 TSF	0.87	167	1.20	230	6.44	1,233
High-Cube Parcel Hub Warehouse	191.394 TSF	0.70	134	0.64	122	4.63	886
High-Cube Cold Storage Warehouse	191.394 TSF	0.11	21	0.12	24	2.12	406

Source: ITE Trip Generation Manual (11th Edition, 2021)
Shaded values exceed trip estimates for cold storage use evaluated in the DEIR.

IP-1-56

As shown above, a High-Cube Fulfillment Center Warehouse (Sort) (ITE Land Use Code 155), which would include uses such as last-mile delivery stations for e-commerce users, may result in substantially greater trip generation for employee cars and delivery vans/vehicles. Therefore, absent conditions of approval or another mechanism to restrict such uses, DEIR/Traffic Analysis underestimates the proposed project's potential trip generation and related impacts.

Based on the trip estimates shown above, a High-Cube Fulfillment Center Warehouse (Sort) or High-Cube Parcel Hub Warehouse would generate more than 50 net new peak hour trips and more than 25 peak hour trips through additional signalized intersections, thus requiring further analysis.

Since the ultimate tenant(s) are not known, the DEIR/Traffic Analysis should be revised to accurately consider trip generation for the worst-case potential tenant. As such revisions would affect key assumptions of the project's trip generation, which in turn affects the need for further analysis and assumptions of the noise and greenhouse gas emissions impact analyses, this would constitute substantial new information and the EIR should be re-circulated.

COMMENT 7

Page 4.7-13, 2nd complete paragraph, refers to land use-to-employee conversion factors developed from the ITE *Trip Generation Manual* for purposes of converting the project land use into socioeconomic data for the VMT modeling performed. The VMT Analysis provided in Appendix E does not specify use of the ITE *Trip Generation Manual* for development of these conversion factors. It is unclear what ITE land use, or other source, was used for developing these conversion factors. Without further information, the DEIR fails to adequately document the methodology used and the appropriateness of these assumptions cannot be verified. IP-1-57

COMMENT 8

Page 4.7-13, Table 4.7.6 identifies the baseline VMT for Orange County as 24.1 VMT per employee; this is inconsistent with the Table 4.7.2 in the Existing Environmental Setting section, which identifies the baseline as 24.81 VMT per employee. IP-1-58

COMMENTS ON APPENDIX E - TRAFFIC ANALYSIS (URBAN CROSSROADS, NOVEMBER 21, 2023)

COMMENT 9

Page 17, Section 2.2 Intersection Capacity Analysis, states that intersection level of service (LOS) was performed based on the 6th Edition Highway Capacity Manual (HCM) methodology. The Traffic Analysis should use the more recent 7th Edition HCM methodology, which was released prior to publication of the November 2023 Traffic Analysis, as well as the latest edition of the Synchro software (currently version 12) in accordance with the City's Traffic Study Guidelines. IP-1-59

COMMENT 10

Page 36, Section 4.1.2 Proposed Project, states that project trip generation was estimated based on trip generation rates for High-Cube Cold Storage Warehouse (ITE Land Use Code 157). As previously noted, use of trip generation rates for High-Cube Fulfillment Center Warehouse (Sort) (ITE Land Use Code 155) would generate approximately 1,232 passenger car equivalent (PCE) trips per day, including 169 PCE trips during the AM peak hour and 232 PCE trips during the PM peak hour. In this case, the project would generate roughly three to four times the number of peak hour PCE trips analyzed in the February 2023 Traffic Analysis. IP-1-60

COMMENT 11

Pages 39/40, Exhibits 4-1 and 4-2. Project trip distribution patterns for passenger cars and trucks are inconsistent with trip distribution forecasts for the adjacent Goodman Commerce Center Traffic Analysis (February 2023) prepared by the same traffic consultant (Urban Crossroads). The following summarizes the inconsistencies: IP-1-61

Distribution To/From	Trucks		Cars	
	5665 Plaza Dr (Exhibit 4-1)	Goodman Commerce Ctr (Exhibit 4-1)	5665 Plaza Dr (Exhibit 4-2)	Goodman Commerce Ctr (Exhibit 4-2)
North on Valley View	20%	25%	30%	20%
Valley View/Katella Intersection	30%	45%	20%	50%
West on Katella Ave	50%	30%	50%	30%

IP-1-61

The DEIR/Traffic Analysis should be revised to be consistent with the Goodman Commerce Center project or explain why the trip distribution assumptions for the Goodman Commerce Center are incorrect.

COMMENT 12

Page 45, Table 4-6. The Traffic Analysis fails to document the trip generation source used to determine cumulative development trip generation forecasts. The trip generation estimate for cumulative development "C3. Goodman Commerce Center" appears to be derived from the *Goodman Commerce Center Traffic Analysis* (Urban Crossroads, February 2023), which assumed that approximately half of that development (195,134 square feet) would consist of High-Cube Transload and Short-Term Storage Warehouse (ITE Land Use Code 154) and half would consist of High-Cube Cold-Storage Warehouse (ITE Land Use Code 157). Trip generation rates for High-Cube Transload and Short-Term Storage Warehouse (ITE Land Use Code 154) are the lowest of high-cube warehousing categories and lower than general warehousing (ITE Land Use Code 150). The cumulative development trip generation may be substantially understated, especially if there is the potential for future occupancy of the Goodman Commerce Center with a fulfillment center sorting facility/last-mile delivery station.

IP-1-62

Absent conditions of approval or another mechanism to restrict such uses, the DEIR/Traffic Analysis underestimates the trip generation and total volumes for future conditions. Therefore, the DEIR/Traffic Analysis should be revised to accurately consider trip generation for the worst-case potential tenant for the adjacent Goodman Commerce Center.

COMMENT 13

Page 1.1-14, Appendix 1.1, Approved Traffic Study Scoping Agreement. The approved scoping agreement states that a safety assessment will be prepared, including review of collision history in the study area. This safety assessment, specifically collision history review, does not appear to be included in the Traffic Analysis. The Traffic Analysis should be revised to include collision history review in accordance with the approved scoping agreement.

IP-1-63

COMMENTS ON APPENDIX E – VMT ANALYSIS (LSA, DECEMBER 15, 2023)

COMMENT 14

Page 2, Project Traffic Analysis Zone Update. The second paragraph refers to conversion of project land use data into model employment using "land use-to-employment conversion factors." The VMT Analysis should specify the source for the conversion factors used. Without further information, the appropriateness of these assumptions cannot be verified.

IP-1-64

COMMENT 15

Page 5, Table A. Footnote 2 of Table A appears to indicate that the baseline project and regional VMT calculations shown are based on the Orange County Transportation Analysis Model (OCTAM) base year 2016 model rather than the environmental baseline year, which is typically based on the date of the Notice of Preparation (in this case, 2024).[2] The project VMT and regional VMT per employee should be calculated for the appropriate existing year (as determined by the applicable environmental baseline year) by interpolating between the base year and future/cumulative year models.

IP-1-65

COMMENT 16

Appendix A – VMT Calculation Worksheet. The heading on the table in the version of this document originally included in the Initial Study/Mitigated Negative Declaration referred to the "Goodman Commerce Center (project)", rather than 5665 Plaza Drive. It appears this has been corrected in the version attached in Appendix E of the DEIR, however, the date of the VMT Analysis memorandum is the same and there is no other indication that the document had been revised.

IP-1-66

Additionally, a total employment of 93 is shown as the employment input for the project. The analysis fails to document the original land use and conversion factors used to determine this input. Without further information, the appropriateness of these assumptions cannot be verified.

COMMENTS ON UPDATED TRAFFIC ANALYSIS (URBAN CROSSROADS, JANUARY 11, 2024)

COMMENT 17

The Update Traffic Analysis (Urban Crossroads, January 11, 2024) appears to contain new Exhibit 1-11, which shows truck turning templates at the intersection of Douglas Drive and Katella Avenue. As shown on Exhibit 1-11, inbound trucks performing a right turn from westbound Katella Avenue to northbound Douglas Drive would have to begin the turn in the through lane adjacent to the designated right turn lane. This presents a potential hazard as passenger cars may attempt to use the dedicated right turn expecting the truck to continue straight and would instead be caught in the trucks turning path.

IP1-67

The DEIR should be revised and re-circulated to include the latest version Traffic Analysis. The Traffic Analysis should demonstrate that trucks can complete the right turn movement without encroaching into the adjacent lane.

CONCLUSION

While it is acknowledged that the project's effects on Level of Service/roadway operations are not considered environmental impacts in the context of CEQA, the comments pertaining to potentially understated trip generation estimates may affect other technical studies such as air quality/greenhouse gas emissions and noise. Additionally, comments pertaining to the VMT analysis and potentially hazardous truck turning paths at the intersection of Douglas Drive and Katella Avenue may affect the findings of significance in the context of CEQA.

IP-1-68

[2] Stevens and Antero (2016). Baseline and Environmental Setting. CEQA Portal Topic Paper, 6. Retrieved May 8, 2024 from https://ceqaportal.org/tp/Baseline%20and%20Environmental%20Setting%20Topic%20Paper%2008-23-16.pdf.

Ms. Allyssa Holcomb
GARRET STIEPEL RYDER LLP
September 20, 2024

We appreciate the opportunity to assist you on this project. Should you have any questions or if we can be of further assistance, please contact us at (714) 795-3100.

IP-1-69

Respectfully submitted,
GANDDINI GROUP, INC.



Giancarlo Ganddini, PE, PTP
Principal
California Registration TR 2663



GIANCARLO GANDDINI, PE, PTP

Traffic Engineer and Transportation Planner

Mr. Ganddini is a Registered Traffic Engineer and certified Professional Transportation Planner with over 16 years of experience in the traffic engineering and transportation planning profession, including over five years as the Principal Traffic Engineer of Ganddini Group, Inc., a consulting firm he founded in 2018. He has directly managed or prepared hundreds of technical studies involving traffic engineering analysis and transportation planning for a broad range of development and infrastructure projects. This experience includes data collection, traffic volume forecasting, roadway capacity analysis, traffic signal control evaluation, collision analysis, complete streets/active transportation planning, traffic modeling and simulation, and conceptual improvements. He is a Past President of the Institute of Transportation Engineers for both the Western District and Southern California Section and continues to be involved in Western District committees.

IP-1-

PROFESSIONAL CREDENTIALS

Professional Traffic Engineer (TR 2663), State of California

Professional Transportation Planner (No. 597), Transportation Professional Certification Board, Inc.

PROFESSIONAL EXPERIENCE

Ganddini Group, Inc., Santa Ana, CA
Founding Principal/Principal Traffic Engineer

Since founding the firm in 2018, Mr. Ganddini has managed all aspects of business operations and has served as Principal-in-Charge for technical services provided on over 600 projects. He has managed the preparation of hundreds of studies involving traffic engineering analysis and transportation planning for a broad range of development and infrastructure projects, including numerous projects in Orange County. Notable projects include, but are not limited to:

- Cypress Town Center 7-AC Residential Traffic/VMT Impact Analysis, City of Cypress
- 1400 Bristol Street North Residences Transportation Impact Analysis, City of Newport Beach
- 1600 Dove Street Residences Transportation Impact analysis, City of Newport Beach
- Picerne Residential (1300 Bristol Street North) Traffic Impact Analysis, City of Newport Beach
- Hughes Warehouse Project Access Study, City of Irvine
- 17731 Cowan Warehouse Access Study, City of Irvine
- Cabrillo at First Mixed-Use Residential Traffic Impact Analysis, City of Santa Ana
- Victoria Boulevard Apartments Traffic Impact Analysis, City of Dana Point
- EF International Language Campus Traffic/Parking Study Peer Review, City of Costa Mesa
- Buena Park Downtown Transportation Peer Review, City of Buena Park
- The Children's School Focused Traffic Analysis, City of Irvine
- Parker Hannifin Access Study, City of Irvine
- Old Dominion Expansion Traffic Analyses, City of Anaheim
- Tina-Pacific Residential Traffic Impact Analysis, City of Stanton
- Ball-Sunkist 7-Eleven & Car Wash Traffic Impact Analysis, City of Anaheim
- 18181 Imperial Highway In-N-Out Traffic Impact Analysis, City of Yorba Linda
- In-N-Out at Orange Outlets Traffic & VMT Impact Analysis, City of Orange
- In-N-Out at 7902 Edinger Avenue Traffic Impact Analysis, City of Huntington Beach
- 710 East Katella Avenue Trailer Parking Trip Generation/VMT Analysis, City of Anaheim

Michael Baker International (Formerly RBF Consulting), Irvine, CA
Civil Associate II and Technical Specialist III

Mr. Ganddini performed technical analysis for small and large-scale transportation planning projects, directed field work, and provided technical oversight to junior staff. After promptly being promoted, he performed project management duties for all stages of the project lifecycle, including preparation of scope of work and budget proposals, direction of technical analysis and completion of tasks, and participation in public meetings and hearings as the subject matter expert. Notable projects include, but are not limited to:

- Enhanced Mobility and Complete Streets Transition Plan. *City of Laguna Beach, CA.*
- Lincoln Specific Plan Traffic Impact Analysis. *City of Whittier*, CA
- Lido House Hotel Traffic Impact Analysis. *City of Newport Beach, CA.*
- City of San Bernardino Traffic Impact Analysis Peer Reviews. *City of San Bernardino, CA.*

Kunzman Associates, Inc., Orange, CA
Junior Associate, Associate, and Manager of Traffic Engineering

As an entry-level engineer, Mr. Ganddini conducted field work and data collection, prepared technical analysis, performed data entry for traffic capacity and forecasting software, and assisted in the preparation of technical reports. He quickly advanced to associate, senior associate, and eventually Manager of Traffic Engineering responsible for overseeing technical staff and implementing best practices and procedures across the company.

EDUCATION

BS, Civil Engineering, University of California, Irvine

PRESENTATIONS/SPEAKING ENGAGEMENTS

Transportation Impact Analysis in the Age of SB 743 & COVID, presented at a joint Orange County/Los Angeles Chapter of the Association of Environmental Professionals (AEP), August 2020

Intro to Transportation Impact Analysis: An Overview of Current and Transitioning Practice, presented at California State University, Long Beach, October 2019

Introduction to Traffic Impact Analysis: An Overview of Current Practice, presented at University of California, Irvine, October 2017

Traffic Impact Studies: Current Practice and Emerging Trends, presented at Cal Poly Pomona, January 2016

RECENT PROFESSIONAL DEVELOPMENT

Adapting Infrastructure to Environmental Change, Institute of Transportation Engineers Education Foundation, July 2024

MUTCD Panel – Future MUTCD, Institute of Transportation Engineers Education Foundation, July 2024

Complete Street Planning, Institute of Transportation Engineers Education Foundation, July 2024

Stepping Forward: What the MUTCD means for crosswalks, traffic calming, and school zones in California, Synapse ITS, February 2024

Setting Safe Speeds, Institute of Transportation Engineers Education Foundation, August 2023

Innovative Approaches to Planned and Unplanned Events, Institute of Transportation Engineers Education Foundation, August 2023

Trends in Transportation Impact Assessment, Institute of Transportation Engineers Education Foundation, August 2023

What's New in the 7th Edition of HCM, McTrans/University of Florida, April 2022

Walking and Biking: User Insights and the Toolkits You Need to Know, Institute of Transportation Engineers Education Foundation, July 2021

Big Data for Complete Streets: Promoting Safety, Mobility, and Equity of all Transportation Modes Through Data-driven Decision Making, Institute of Transportation Engineers Education Foundation, July 2021

ITE Western District Annual Meeting, Session 10 – Traffic Studies, Institute of Transportation Engineers Education Foundation, June 2020

ITE Western District Annual Meeting, Session 11 – Travel Demand Models, Institute of Transportation Engineers Education Foundation, June 2020

ITE Western District Annual Meeting, Session 19 – What's New in VMT, Institute of Transportation Engineers Education Foundation, June 2020

PROFESSIONAL AFFILIATIONS

Institute of Transportation Engineers (member since 2009)
- Western District Past President
- Western District Public Relations Committee
- Southern California Section Past President

Orange County Traffic Engineering Council (member since 2009)

AWARDS

Young Transportation Engineer of the Year (2011), ITE Southern California Section

Garrett Stiepel Ryder LLP Letters Dated
June 5, 2024, March 7, 2024, and September 11, 2023

GARRETT
STIEPEL RYDER LLP

Allyssa J. Holcomb
Direct Dial No.
(714) 384-4313
Email Address
aholcomb@garrettllp.com

June 5, 2024

VIA EMAIL *(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. IP-1-70

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 IP-1-71

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**. IP-1-71

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.[1]

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. IP-1-72

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".

[1] 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. IP-1-72

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. IP-1-73

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.[2] 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. IP-1-74

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:

[2] 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**".[3]

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). IP-1-74

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[4], 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 *mus*t evaluate the reasonably foreseeable use of the project for logistics purposes.

[Remainder of Page Intentionally Left Blank]

[3] https://www.goodman.com/about-goodman/about-us.
[4] 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;

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. IP-1-75

We appreciate your time and consideration on these matters.

Regards,

Allyssa J. Holcomb /kw

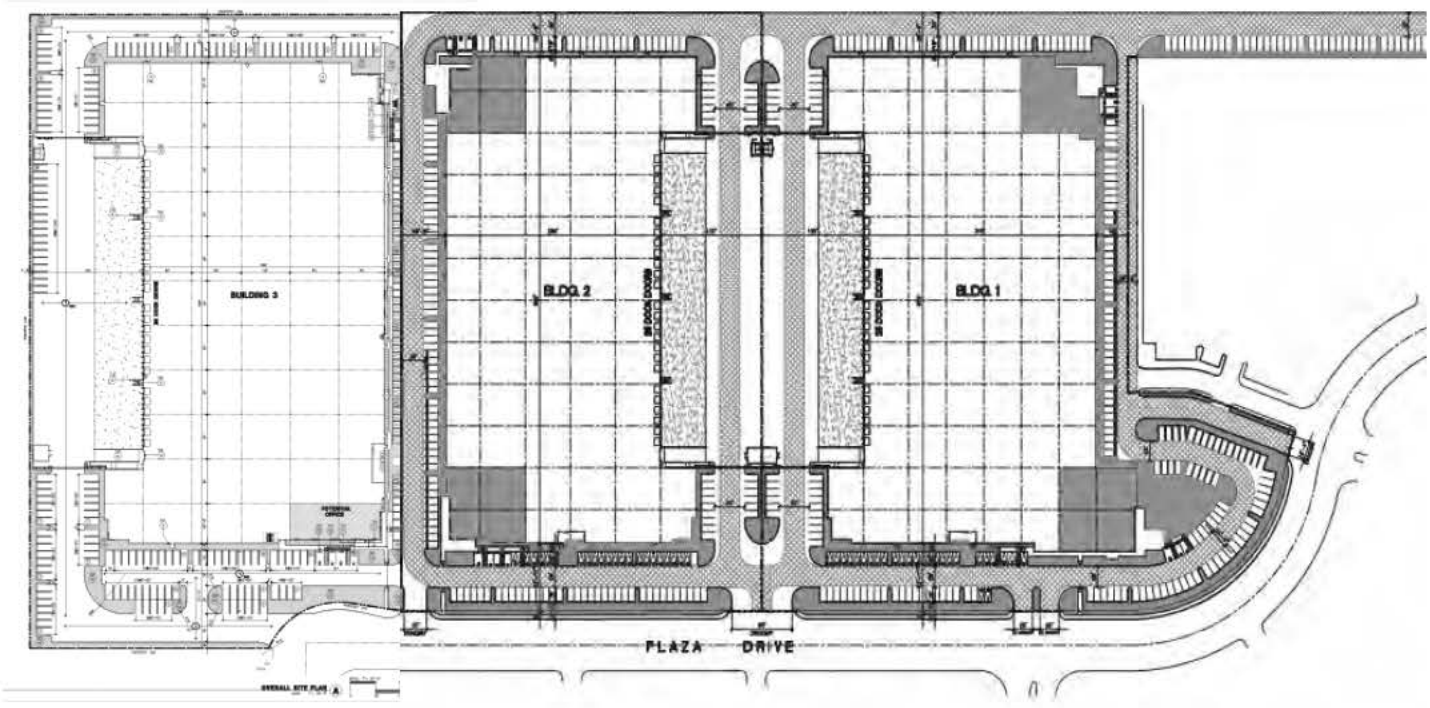
Allyssa J. Holcomb

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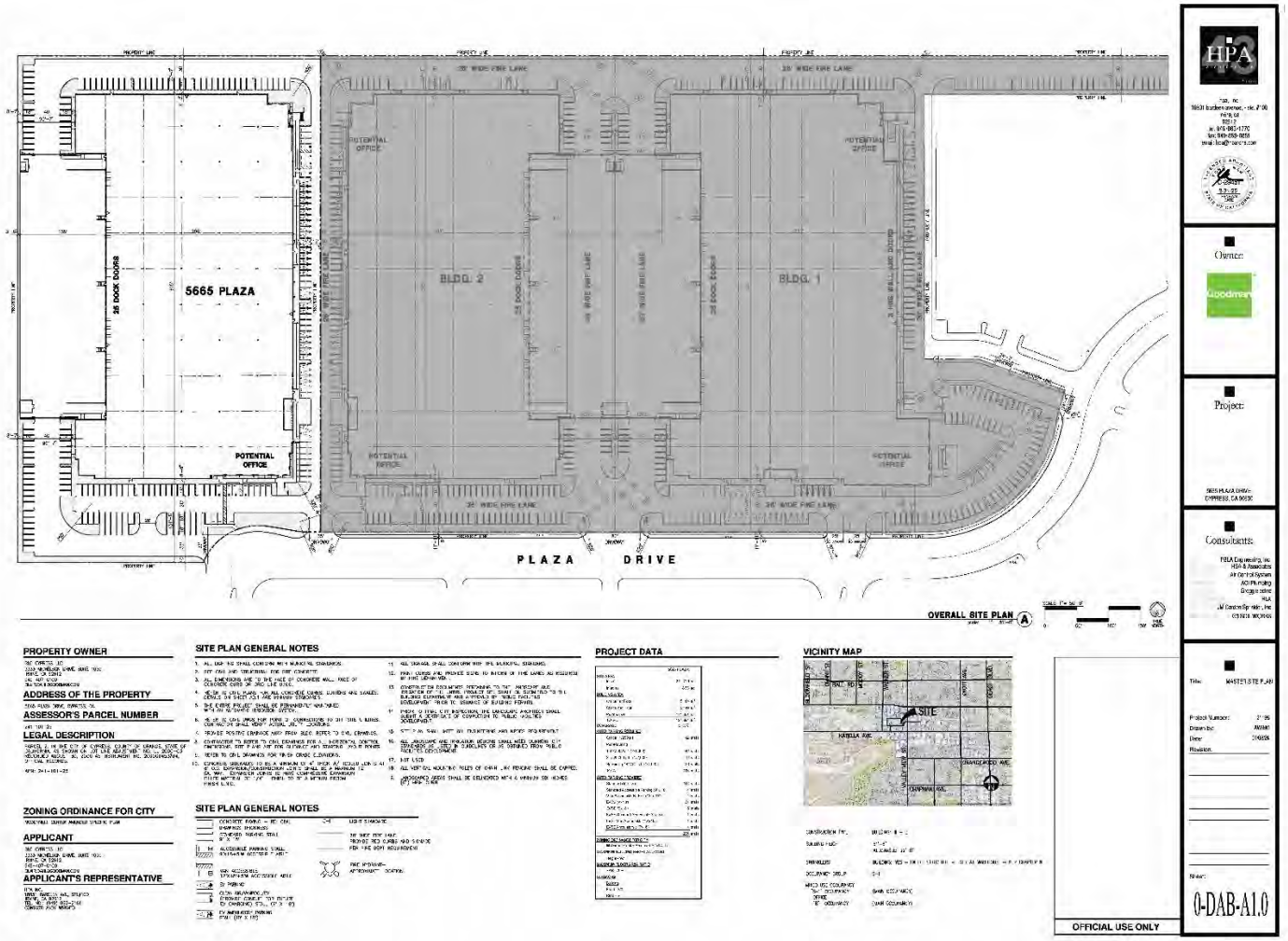
cc: City Clerk of the City of Cypress *(via email)*
Mr. Peter Grant, City Manager *(via email)*
Mayor Scott Minikus, City Council, City of Cypress *(via email)*
Mayor Pro Tem Bonnie Peat, City Council, City of Cypress *(via email)*
Council Member David Burke, City Council, City of Cypress *(via email)*
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)



Cumulative Site Plan



GARRETT
STIEPEL RYDER LLP

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Email Address
aholcomb@garrettllp.com

March 7, 2024

VIA EMAIL (*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. IP-1-76

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

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 that 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.

IP-1-76

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.[1] 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). IP-1-76

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

IP-1-

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. IP-1-77

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.[2] 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".[3] Any Initial Study must (a) consider all phases of project planning, implementation, and operation, and (b) contain a description of the project.[4] Two key purposes of an Initial Study are to "(1) Provide the lead agency with information to use as the basis for deciding whether

[1] 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.
[2] Cal. Code Regs. tit. 14, § 15020.
[3] Cal. Code Regs. tit. 14, § 15060.
[4] 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."[5] 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.[6] 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.[7] *(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).[8] 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.

IP-1-77

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

[5] Cal. Code Regs. tit. 14, §§ 15063(c)(1) and 15063(c)(2).
[6] Cal. Code Regs. tit. 14, § 15064.
[7] Cal. Code Regs. tit. 14, § 15070(b).
[8] 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. IP-1-77

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.[9] 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.[10] 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. IP-1-78

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.[11] 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.[12] 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.[13] 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 IP-1-79

[9] Cal. Code Regs. tit. 14, § 15378.
[10] Citizens Ass'n for Sensible Dev. of Bishop Area v. Cty. of Inyo, 172 Cal. App. 3d 151, 165 (1985).
[11] Cal. Code Regs. tit. 14, § 15130.
[12] Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal., 47 Cal. 3d 376, 394 (1988).
[13] 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.

IP-1-79

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.

IP-1-80

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.

IP-1-81

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. IP-1-82

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.[14]

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.[15]

[14] 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.
[15] Cal. Code Regs. tit. 14, § 15147.

b. Daily Truck Trips

The Traffic Analysis contemplates 342 additional daily PCE[16] 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. IP-1-83

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[17] 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.[18] 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. IP-1-84

b. Analysis Fails to Evaluate Off-Site Impacts

The localized air quality impacts analysis in the MND only includes on-site sources.[19] CEQA requires the evaluation of all significant environmental effects related to a project, including off-site impacts if they are reasonably foreseeable.[20] 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)[21], 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. IP-1-85

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 86

[16] "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.
[17] Refrigerated trucks typically weigh 43,000 – 45,000 lbs (https://www.atsinc.com/blog/legal-axle-weight-limits-commercial-trucks-explained)
[18] Health Analyses (ca.gov)
[19] Page 4.3-10 of the MND.
[20] Cal. Code Regs. tit. 14, § 15130.
[21] 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.[22] 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. IP-1-86

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. IP-1-87

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_2e per year.[23] The MND further states the 5665 Redevelopment is anticipated to result in 3,191.6 MT CO_2e 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_2e 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. IP-1-88

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.[24] 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. IP-1-89

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. IP-1-90

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[22] Page 4.3-9 of the MND.
[23] Page 4.8-4 of the 5665 Plaza Drive MND.
[24] 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.[25] The MND therefore failed to eliminate significant impacts on the environment and CEQA requires that in such cases an EIR must be prepared. IP-1-91

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. IP-1-92

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. IP-1-93

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.[26] 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. IP-1-94

[25] Page 4.9-3 of the 5665 Plaza Drive MND.
[26] 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 that significant level.

IP-1-95

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

Regards,

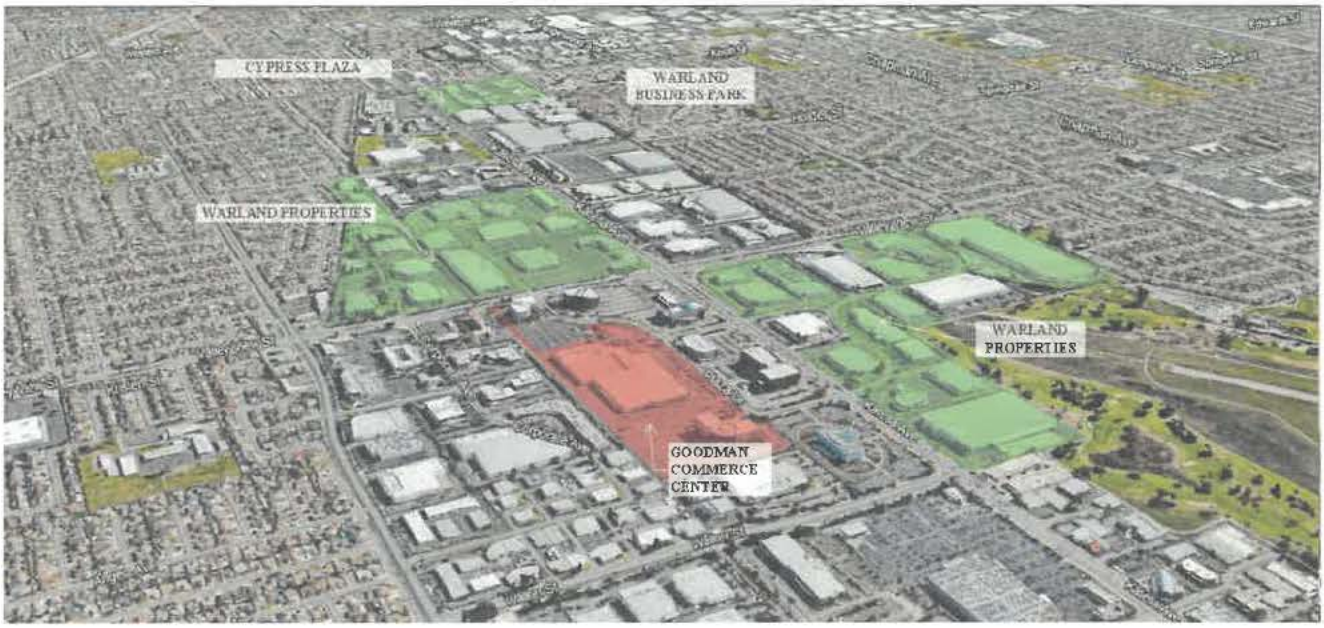
Allyssa J. Holcomb

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
0014 7713-093-SDC

Recorded in Official Records, Orange County
Hugh Nguyen, Clerk-Recorder
45.00
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2021000575922 3:39 pm 09/15/21
156 403A G02 7 19
70549.33 70549.32 20.00 0.00 18.00 0.00 0.000.000.00 0.00

(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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08575\025A\9047910

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 Pelts, 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

08575\025A\9047910

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: 01FA6021152 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: _____
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 MINERALS 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. 20000396720,0F 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.

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. 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

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**

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.

APPROVED BY: Peter Grant, City Manager

Attachments
LSA Task Order
Vicinity Map

Schedule 5

LSA Task Order (Cover Page Only)

LSA

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., or Mr. Wiswell at (510) 236-6810 or Matthew.Wiswell@lsa.net.

Sincerely,

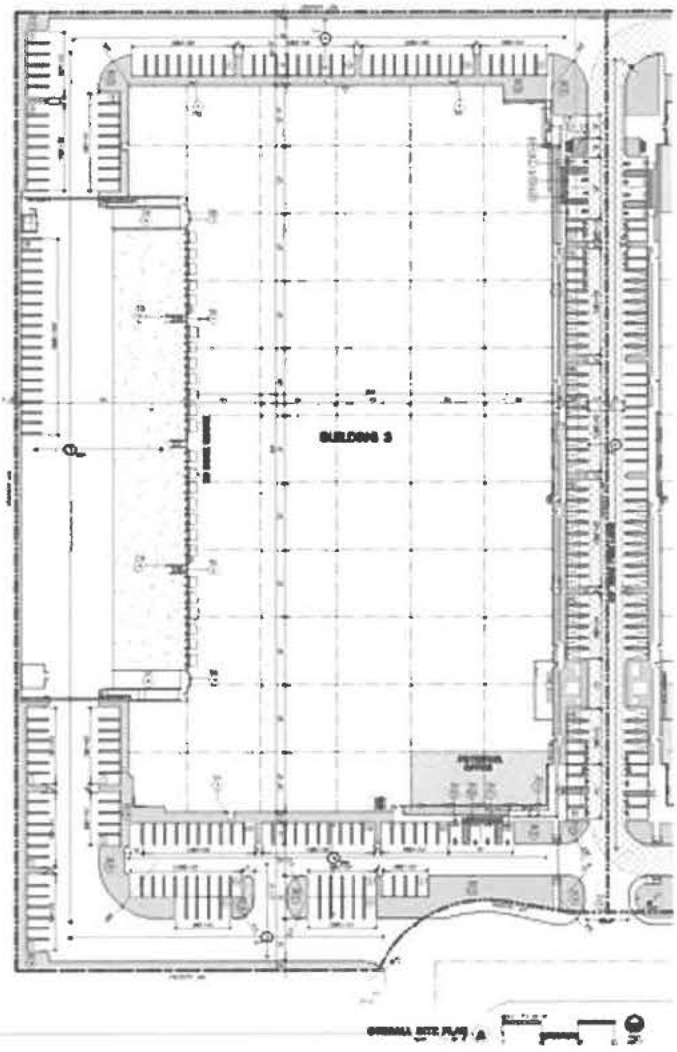
LSA Associates, Inc.

Ryan Bensley
Principal in Charge

Attachment: **Proposal to Prepare an Environmental Document and Technical Studies**

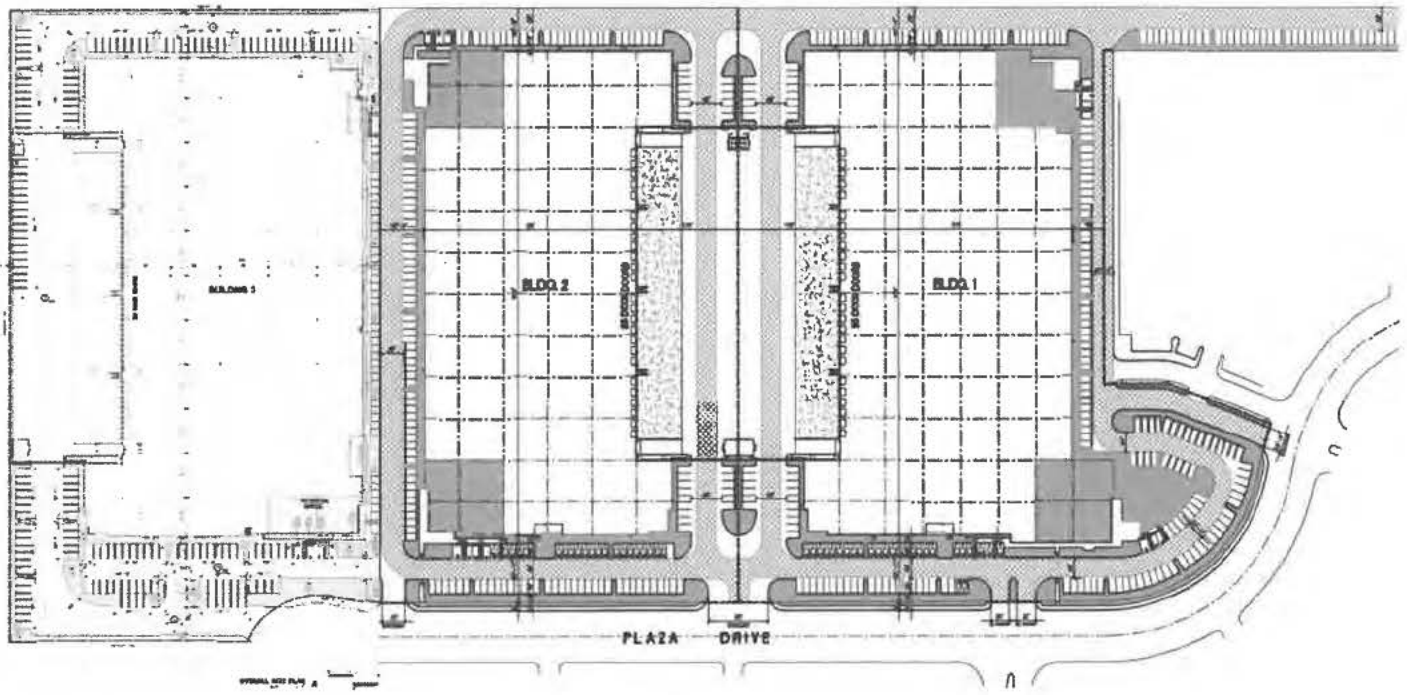
Schedule 6

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

MAINTAIN FINANCIAL STABILITY AND PROMOTE ECONOMIC ACTIVITY						
WHEN	**WHO**	**WHAT**	**STATUS**			**COMMENTS**
			DONE	ON TARGET	REVISED	
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		

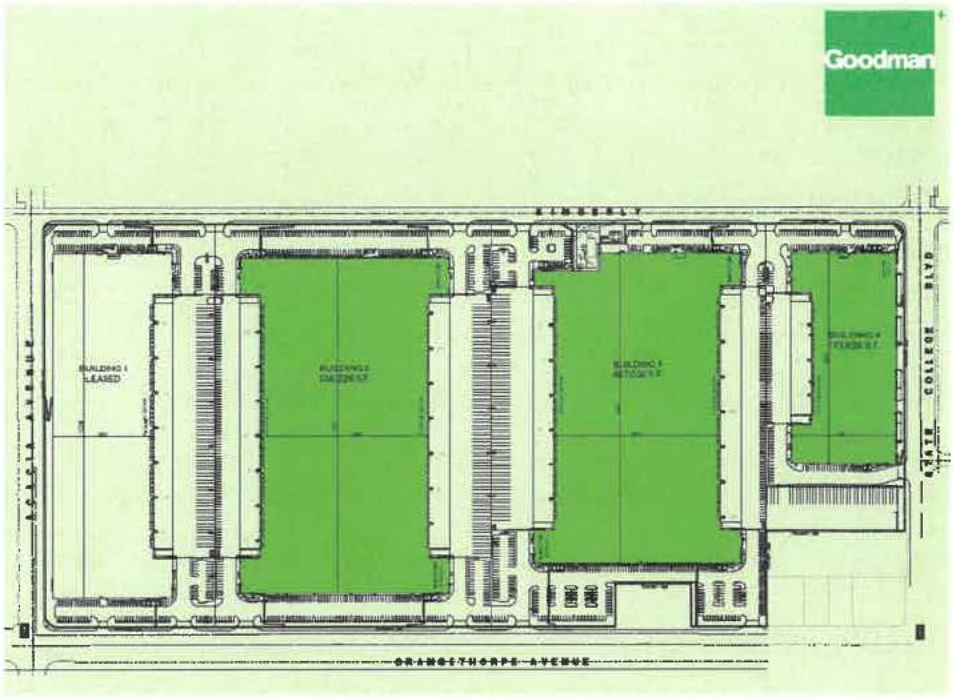
Schedule 9

Examples of Goodman Logistics Centers

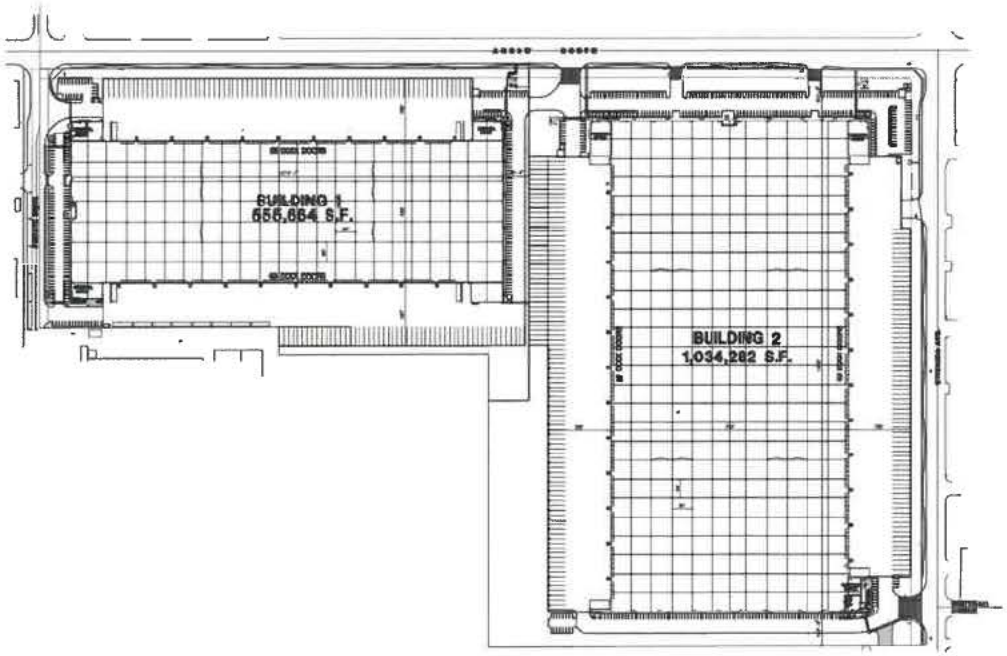
Fullerton

GLC FULLERTON
SITE PLAN

BUILDING 2	**538,226 sqft**
Clear height	40'
Office	6,323 sqft
Mezzanine (N)	6,123 sqft
Mezzanine (S)	6,123 sqft
Car parking	412
Dock doors	98
Trailer parking	75 stalls
BUILDING 3	**487,036 sqft**
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
BUILDING 4	**173,825 sqft**
Clear height	36'
Office	5,743 sqft
Mezzanine	5,543 sqft
Car parking	143
Dock doors	23
Trailer parking	34 stalls



Rancho Cucamonga



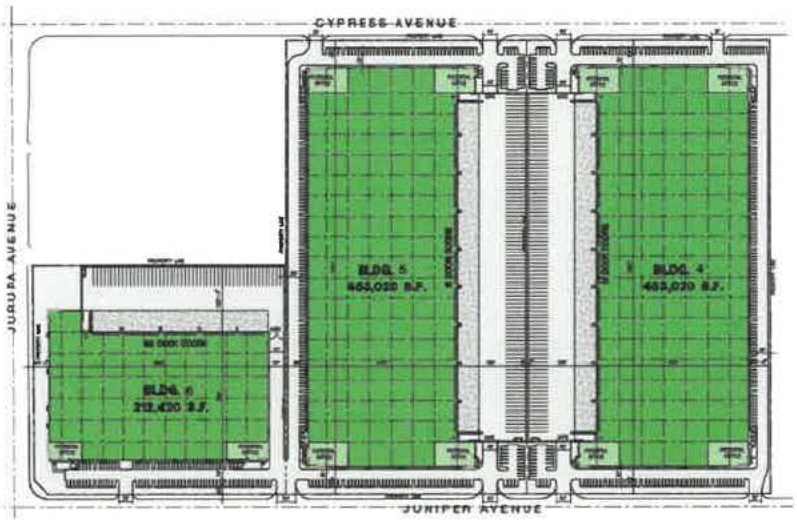
Fontana

PLAN+

Goodman

GOODMAN LOGISTICS CENTER FONTANA

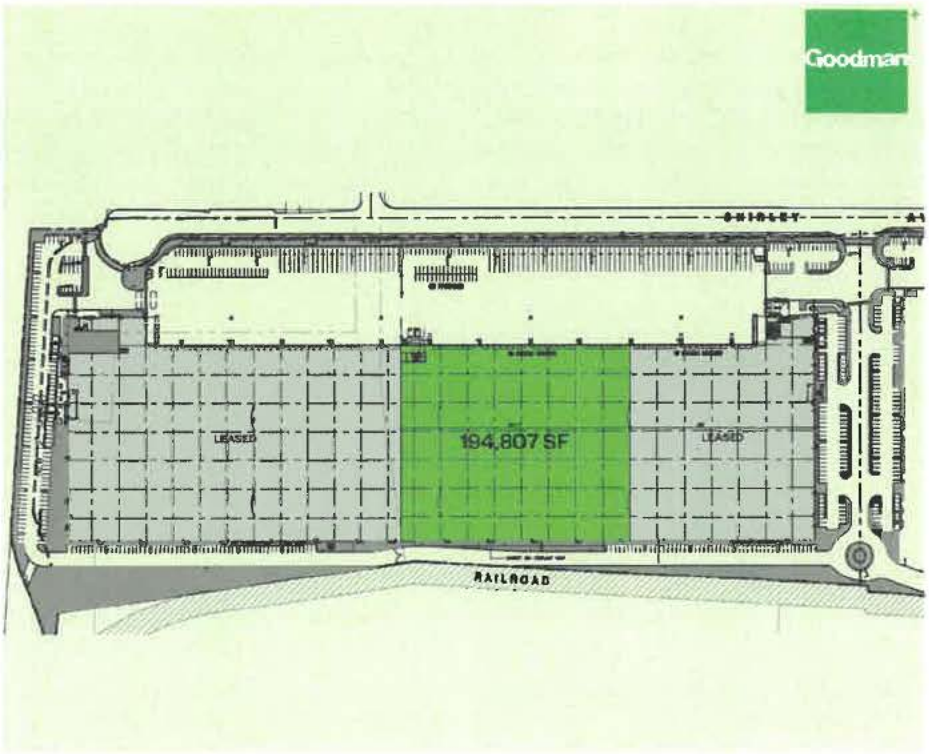
Building 4	453,020 sqft
Clear height	36'
Car parking	227
Dock doors	92
Trailer parking	92 stalls
Building 5	453,020 sqft
Clear height	36'
Car parking	227
Dock doors	92
Trailer parking	92 stalls
Building 6	212,420 sqft
Clear height	36'
Car parking	81
Dock doors	36
Trailer parking	37 stalls



El Monte

GLC EL MONTE BUILDING 2

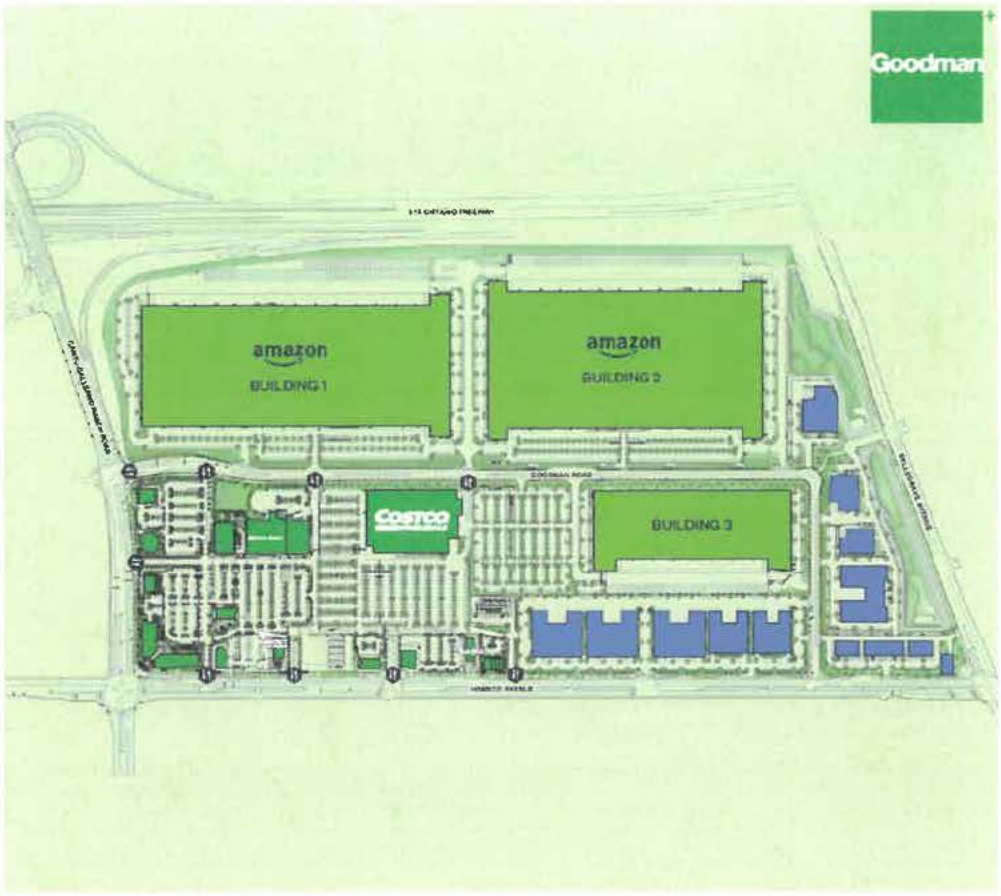
BUILDING AREA	194,807 sqft
Office	1,800 sqft
Dock doors	28
Trailer stalls	29
Parking stalls	53
Power	1000A 277/480V 3P 4W service
Clear height	36'
Decking/Apron	12'



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	19,400 sqft
Building	6,000 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	58,423 sqft
Building 14	58,423 sqft
Building 15	58,796 sqft
Building 16	30,546 sqft
Building 17	38,209 sqft



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

Schedule 10

Goodman California Projects

Property Type	Name	Address	Approximate Square Feet
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

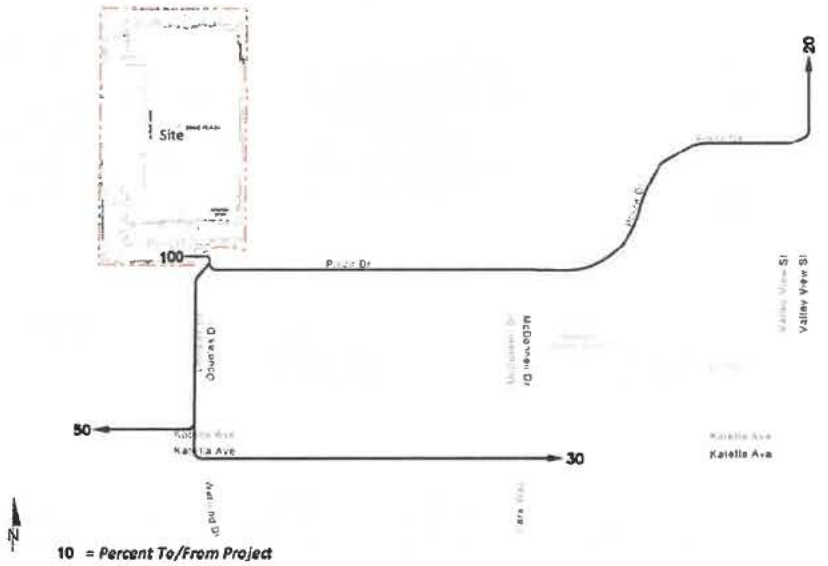
Business Park, Logistics Center, Retail	Goodman Commerce Center Eastvale	Adjacent to I-15 between Cantu-Galleano Ranch Road and Bellegrave Avenue Eastvale, CA, USA	3,263,495
TBD	Goodman Commerce Center Cypress	5665 & 5757 Plaza Drive Cypress, CA 90630	581,662
Business Park	Goodman Innovation Center Belmont	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

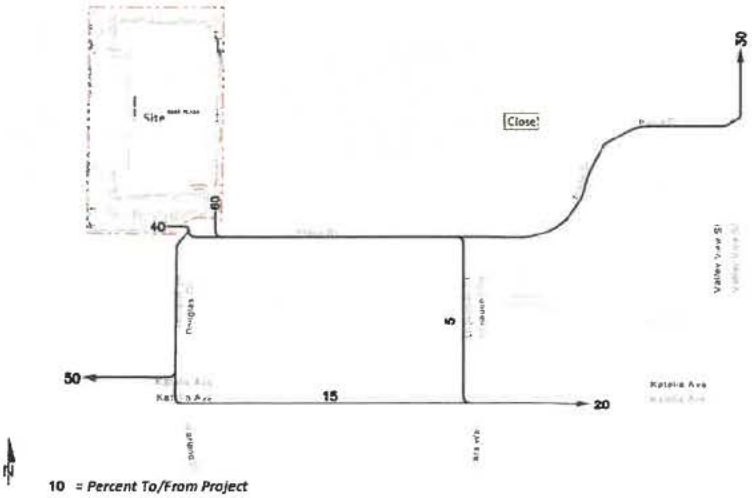
a. **5665 PLAZA DRIVE Truck Distribution**

EXHIBIT 4-1: PROJECT (TRUCK) TRIP DISTRIBUTION



b. **5665 PLAZA DRIVE PASSENGER CAR Distribution**

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



c. **<u>5757 PLAZA DRIVE</u> Truck Distribution**

EXHIBIT 4-1: PROJECT (TRUCK) 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[1]	Quantity Units[2]
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

[1] TSF = Thousand Square Feet; DU = Dwelling Units

TABLE 4-6: CUMULATIVE DEVELOPMENT TRIP GENERATION SUMMARY

	AM Peak Hour			PM Peak Hour			
Land Use	In	Out	Total	In	Out	Total	Daily
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
Total	**257**	**181**	**438**	**267**	**337**	**604**	**8,057**

GARRETT
STIEPEL RYDER LLP

Allyssa J. Holcomb
Direct Dial No.
(714) 384-4313
Email Address
aholcomb@garrettllp.com

March 7, 2024

VIA EMAIL (*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. IP-1-96

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

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 that 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.

IP-1-96

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.[1] 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

IP-1-96

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.[2] 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".[3] Any Initial Study must (a) consider all phases of project planning, implementation, and operation, and (b) contain a description of the project.[4] Two key purposes of an Initial Study are to "**(1)** Provide the lead agency with information to use as the basis for deciding whether

[1] 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.
[2] Cal. Code Regs. tit. 14, § 15020.
[3] Cal. Code Regs. tit. 14, § 15060.
[4] 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."[5] 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.[6] 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.[7] *(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).[8] 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.

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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

[5] Cal. Code Regs. tit. 14, §§ 15063(c)(1) and 15063(c)(2).
[6] Cal. Code Regs. tit. 14, § 15064.
[7] Cal. Code Regs. tit. 14, § 15070(b).
[8] 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.[9] 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.[10] 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. IP-1-96

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.[11] 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.[12] 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.[13] 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

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[9] Cal. Code Regs. tit. 14, § 15378.
[10] Citizens Ass'n for Sensible Dev. of Bishop Area v. Cty. of Inyo, 172 Cal. App. 3d 151, 165 (1985).
[11] Cal. Code Regs. tit. 14, § 15130.
[12] Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal., 47 Cal. 3d 376, 394 (1988).
[13] 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. IP-1-96

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.

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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.[14]

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.[15]

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[14] 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.

[15] Cal. Code Regs. tit. 14, § 15147.

b. Daily Truck Trips

The Traffic Analysis contemplates 342 additional daily PCE[16] 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[17] 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.[18] 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

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The localized air quality impacts analysis in the MND only includes on-site sources.[19] CEQA requires the evaluation of all significant environmental effects related to a project, including off-site impacts if they are reasonably foreseeable.[20] 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)[21], 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

[16] "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.
[17] Refrigerated trucks typically weigh 43,000 – 45,000 lbs (https://www.atsinc.com/blog/legal-axle-weight-limits-commercial-trucks-explained)
[18] Health Analyses (ca.gov)
[19] Page 4.3-10 of the MND.
[20] Cal. Code Regs. tit. 14, § 15130.
[21] 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.[22] 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.

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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_2e per year.[23] The MND further states the 5665 Redevelopment is anticipated to result in 3,191.6 MT CO_2e 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_2e 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.[24] 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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[22] Page 4.3-9 of the MND.
[23] Page 4.8-4 of the 5665 Plaza Drive MND.
[24] 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.[25] 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.

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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.[26] 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.

[25] Page 4.9-3 of the 5665 Plaza Drive MND.
[26] 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 that 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. IP-1-96

Regards,

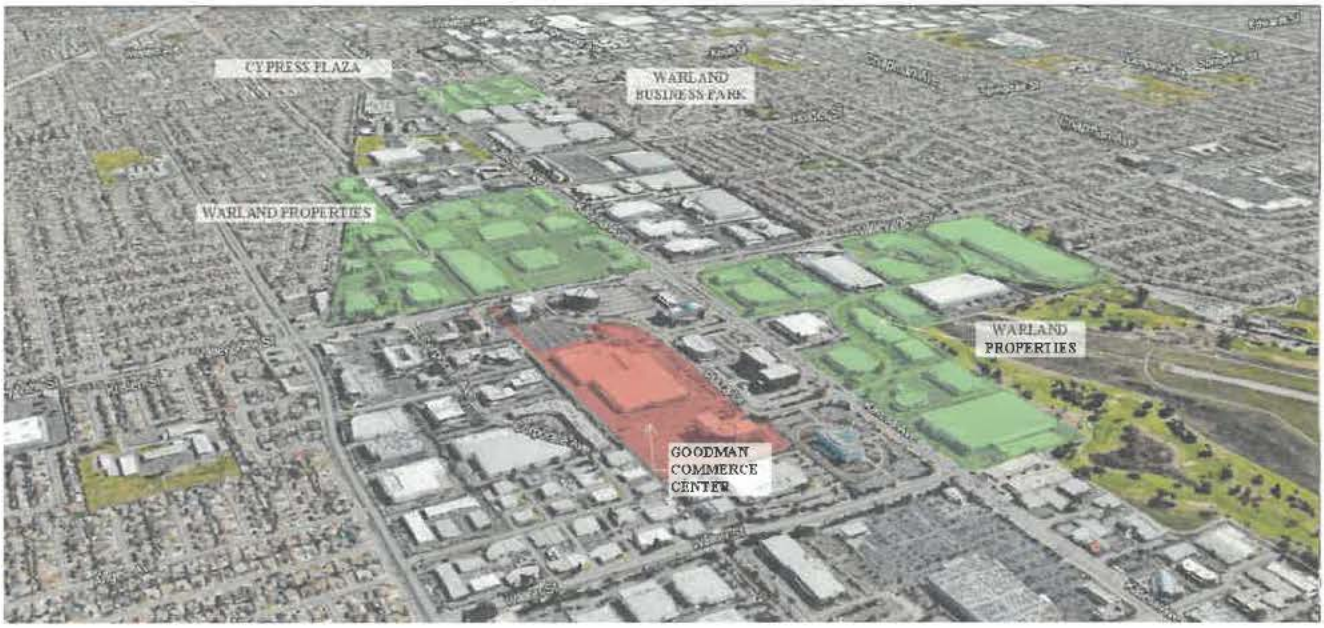
Allyssa J. Holcomb

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
0014 7713-093-SDC

Recorded in Official Records, Orange County
Hugh Nguyen, Clerk-Recorder
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156 403A G02 7 19
70549.33 70549.32 20.00 0.00 18.00 0.00 0.000.000.00 0.00

(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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08575\025A\9047910

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 Pelts, 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: 01FA6021152 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: _____
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 MINERALS 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. 20000396720,0F 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.

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. 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

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**

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.

APPROVED BY: Peter Grant, City Manager

Attachments
LSA Task Order
Vicinity Map

Schedule 5

LSA Task Order (Cover Page Only)

LSA

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., or Mr. Wiswell at (510) 236-6810 or Matthew.Wiswell@lsa.net.

Sincerely,

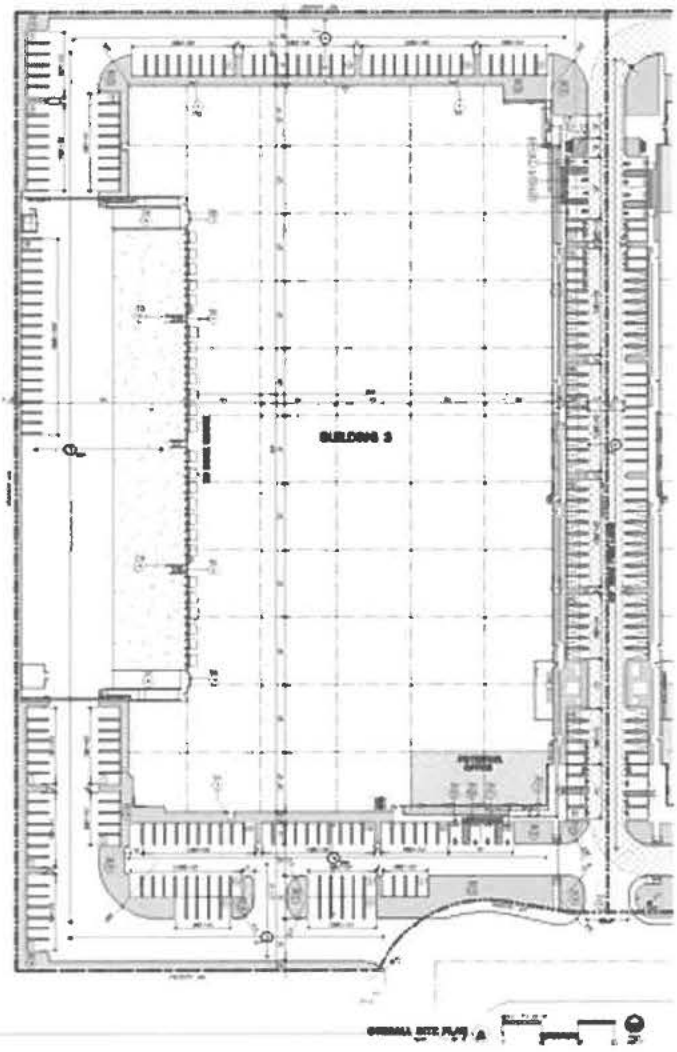
LSA Associates, Inc.

Ryan Bensley
Principal in Charge

Attachment: **Proposal to Prepare an Environmental Document and Technical Studies**

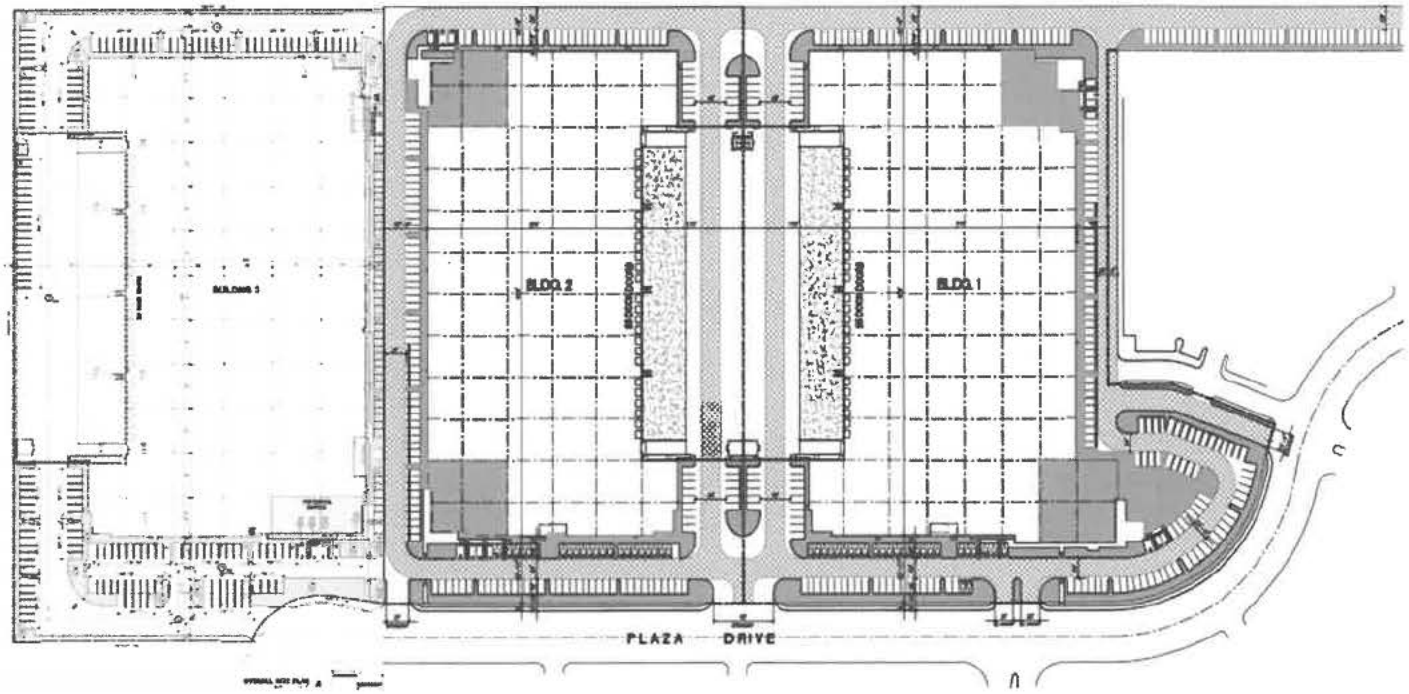
Schedule 6

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

MAINTAIN FINANCIAL STABILITY AND PROMOTE ECONOMIC ACTIVITY						
WHEN	**WHO**	**WHAT**	**STATUS**			**COMMENTS**
			DONE	ON TARGET	REVISED	
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		

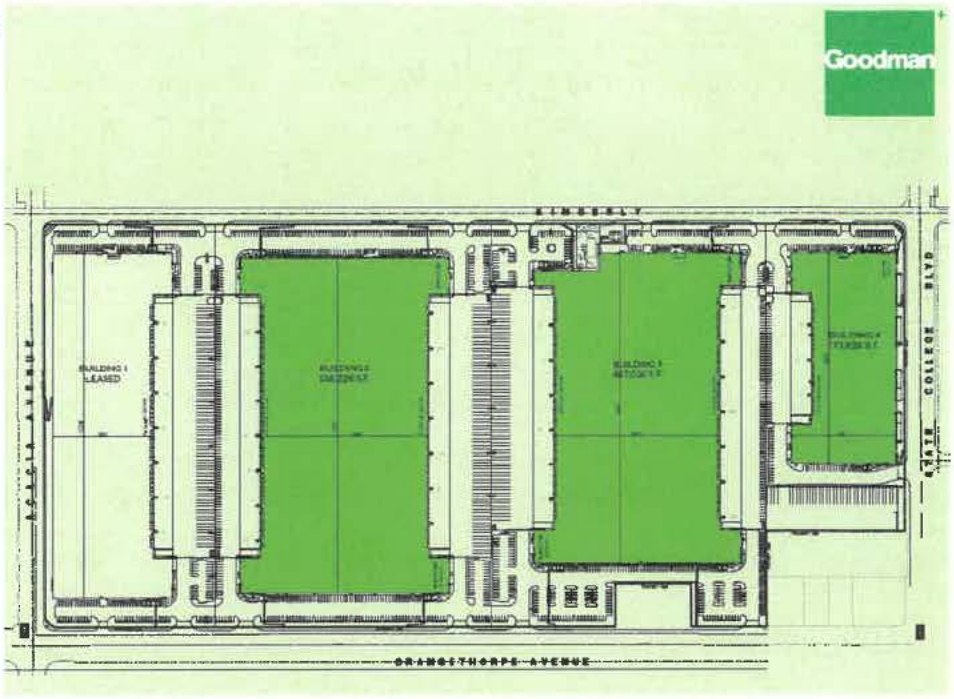
Schedule 9

Examples of Goodman Logistics Centers

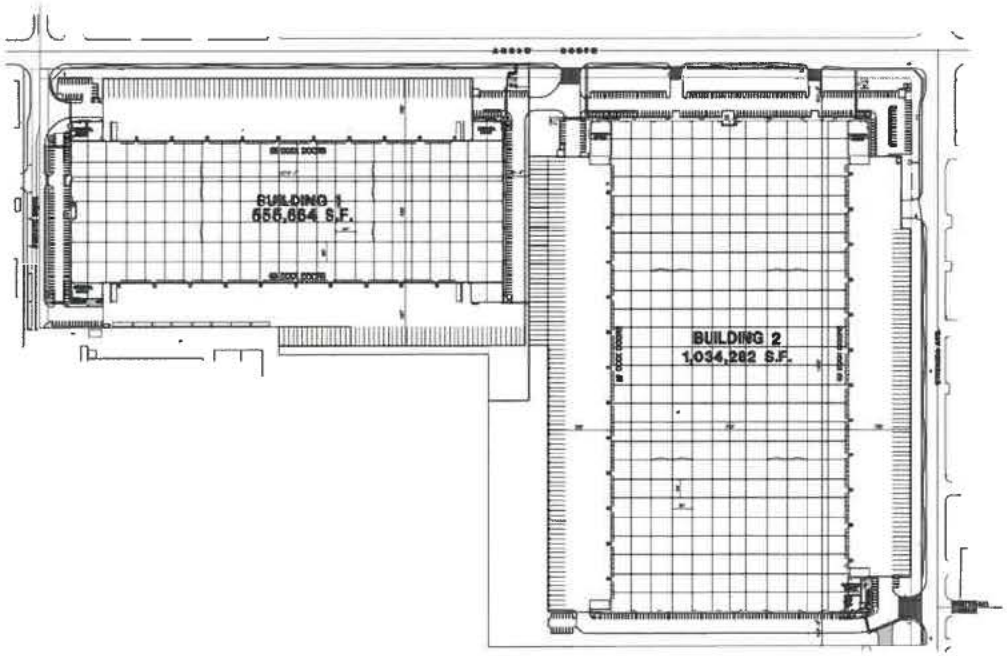
Fullerton

GLC FULLERTON
SITE PLAN

BUILDING 2	**538,226 sqft**
Clear height	40'
Office	6,323 sqft
Mezzanine (N)	6,123 sqft
Mezzanine (S)	6,123 sqft
Car parking	412
Dock doors	98
Trailer parking	75 stalls
BUILDING 3	**487,036 sqft**
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
BUILDING 4	**173,825 sqft**
Clear height	36'
Office	5,743 sqft
Mezzanine	5,543 sqft
Car parking	143
Dock doors	23
Trailer parking	34 stalls



Rancho Cucamonga



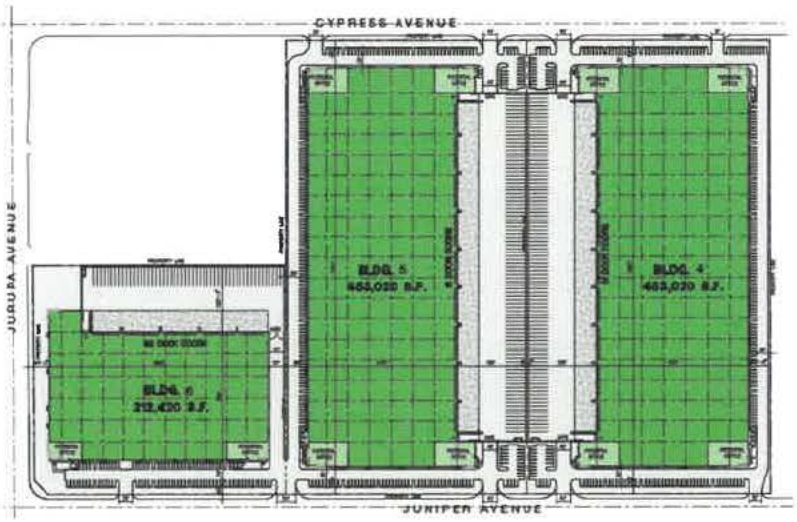
Fontana

PLAN+

Goodman

GOODMAN LOGISTICS CENTER FONTANA

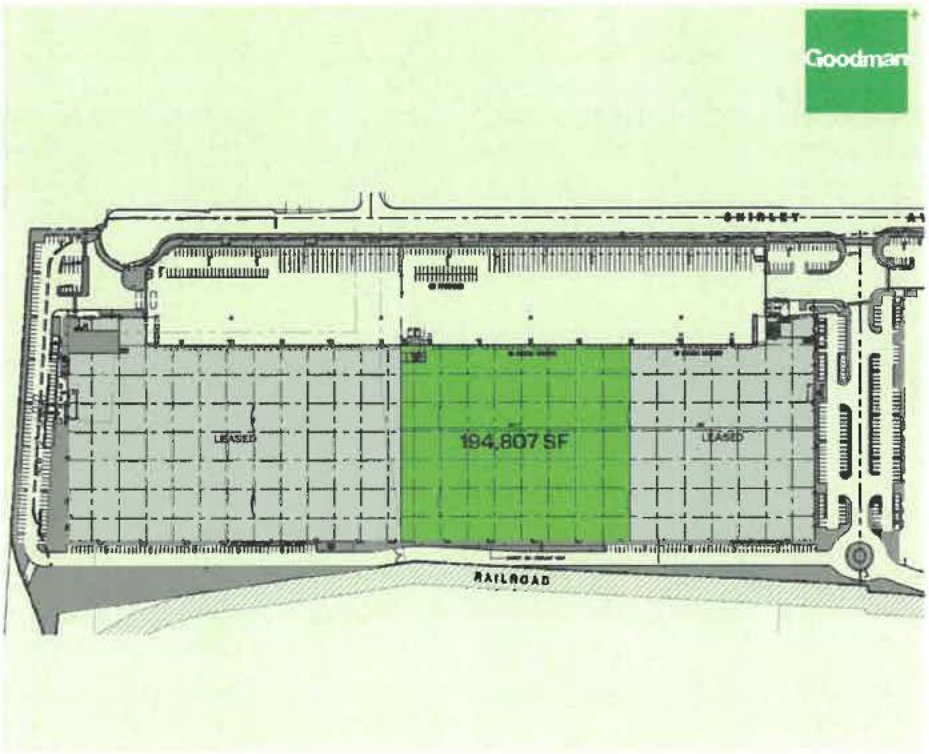
Building 4	453,020 sqft
Clear height	36'
Car parking	227
Dock doors	92
Trailer parking	92 stalls
Building 5	453,020 sqft
Clear height	36'
Car parking	227
Dock doors	92
Trailer parking	92 stalls
Building 6	212,420 sqft
Clear height	36'
Car parking	81
Dock doors	36
Trailer parking	37 stalls



El Monte

GLC EL MONTE BUILDING 2

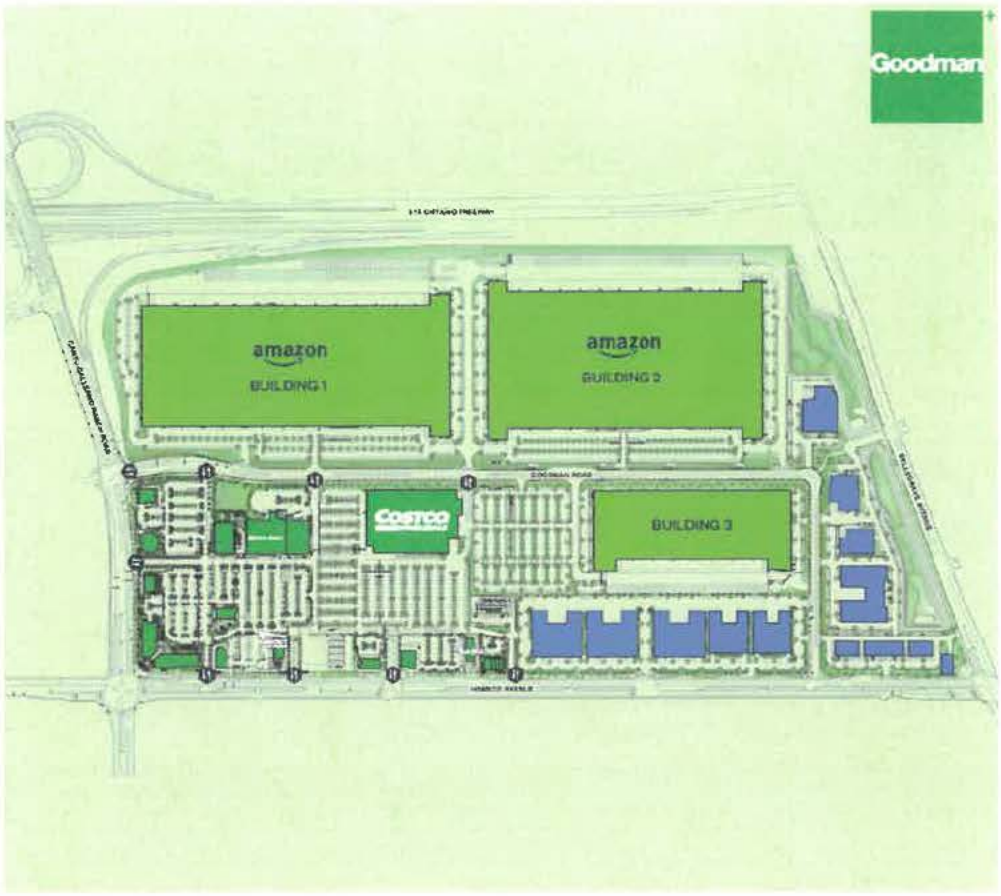
BUILDING AREA	194,807 sqft
Office	1,800 sqft
Dock doors	28
Trailer stalls	29
Parking stalls	53
Power	1000A 277/480V 3P 4W service
Clear height	36'
Decking/Apron	12'



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	19,400 sqft
Building	6,000 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	58,423 sqft
Building 14	58,423 sqft
Building 15	58,796 sqft
Building 16	30,546 sqft
Building 17	38,209 sqft



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

Schedule 10

Goodman California Projects

Property Type	Name	Address	Approximate Square Feet
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

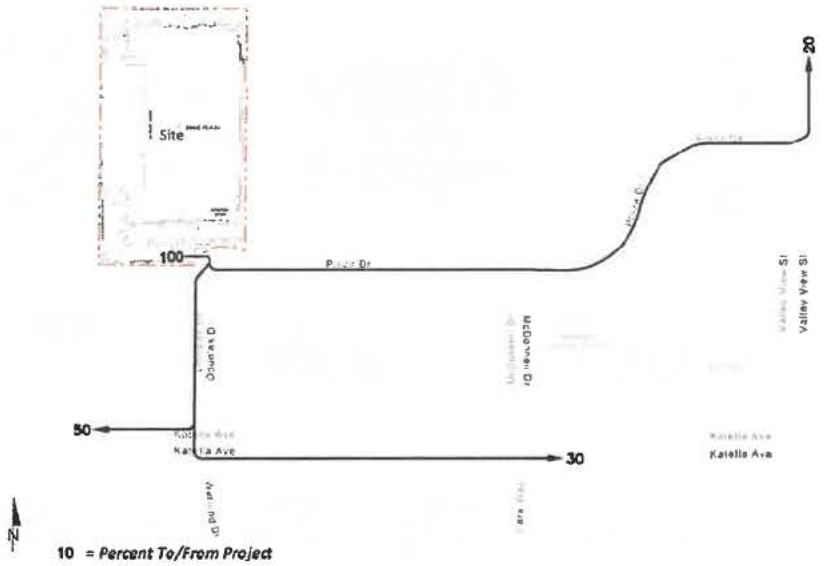
Business Park, Logistics Center, Retail	Goodman Commerce Center Eastvale	Adjacent to I-15 between Cantu-Galleano Ranch Road and Bellegrave Avenue Eastvale, CA, USA	3,263,495
TBD	Goodman Commerce Center Cypress	5665 & 5757 Plaza Drive Cypress, CA 90630	581,662
Business Park	Goodman Innovation Center Belmont	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

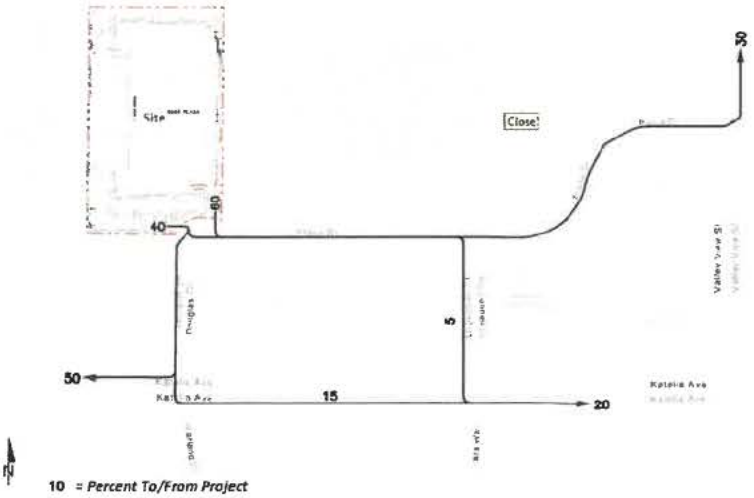
a. **5665 PLAZA DRIVE Truck Distribution**

EXHIBIT 4-1: PROJECT (TRUCK) TRIP DISTRIBUTION



b. **5665 PLAZA DRIVE PASSENGER CAR Distribution**

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



c. **<u>5757 PLAZA DRIVE</u> Truck Distribution**

EXHIBIT 4-1: PROJECT (TRUCK) 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[1]	Quantity Units[2]
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

[1] TSF = Thousand Square Feet; DU = Dwelling Units

TABLE 4-6: CUMULATIVE DEVELOPMENT TRIP GENERATION SUMMARY

	AM Peak Hour			PM Peak Hour			
Land Use	In	Out	Total	In	Out	Total	Daily
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
Total	**257**	**181**	**438**	**267**	**337**	**604**	**8,057**

GARRETT
STIEPEL RYDER LLP

Allyssa J. Holcomb

Direct Dial No.
(714) 384-4313

Email Address
aholcomb@garrettllp.com

September 11, 2023

VIA EMAIL (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: Goodman 5665 Plaza Drive Warehouse Project
Environmental Documents and Technical Analysis
Cypress, California

Dear City Council Members:

As you may know, 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.

We understand that GLC Cypress LLC ("**Goodman**") intends to redevelop an 8.5 acre site within the Park located at 5665 Plaza Drive by demolishing an existing office building and constructing a new facility that will consist primarily of new warehouse space (we understand the project will have approx. 181,061 sf of warehouse space and approx. 10,333 sf of office space) for an unspecified industrial use ("**5665 Plaza**"). 5665 Plaza is located immediately adjacent to that certain project owned by Goodman located at 5757 Plaza Drive and commonly referred to as "Goodman Commerce Center" ("**5757 Plaza**"), which is also being redeveloped by Goodman to construct two (2) new buildings consisting primarily of warehouse space, to be used for an unspecified industrial use (the redevelopment of 5665 Plaza and 5757 Plaza by Goodman are collectively referred to herein as the "**Goodman projects**"). The Goodman projects are depicted in Exhibit A attached hereto. The Goodman projects are located within a block of the intersection of Plaza Drive (which becomes Chip Avenue at Valley View Street) and Valley View Street ("**Intersection**"). Warland is an interested party by virtue of owning two (2) facilities located at the Intersection – specifically, an office building and an office/warehouse facility – as well as numerous other office and warehouse buildings located within a mile of the Goodman projects.

IP-1-97

We previously reached out to you to address Warland's concerns regarding the increased truck traffic that will result from the redevelopment of 5757 Plaza, as well as certain inaccuracies in the traffic study made available to the public as part of the environmental review conducted for 57575 Plaza pursuant to the California Environmental Quality Act ("**CEQA**"). A copy of that correspondence is enclosed for your reference. The redevelopment of 5665 Plaza as another large warehouse located immediately adjacent to the two (2) large warehouses to be located at 5757 Plaza gives rise to the same concerns that we addressed in the enclosed letter, which is that the truck traffic entering and exiting the Intersection

will greatly increase from both current conditions and from the conditions that existed when the existing office building located at 5665 Plaza and the existing office/warehouse building located at 5757 Plaza were fully occupied. The Goodman projects will have a significant impact on users of the Intersection and the surrounding area. IP-1-97

Specifically, the Goodman projects will increase the warehouse space on 5665 Plaza and 5757 Plaza by over 300,000 square feet, which will dramatically change the extent and nature of the truck traffic entering and existing the Intersection. While there will also certainly be significant impacts to air quality and noise at the Intersection and surrounding areas of the Park due to the Goodman projects, the truck traffic alone will have significant adverse effects on users of the buildings located at the Intersection (and in the surrounding areas) by increasing both the time the people working in those buildings have to spend in their vehicles (which will also increase damaging air quality impacts) and the associated traffic-related frustrations, and by reducing both the productivity and the quality of life of such users, many of which are residents of the City. We must note that three (3) of the four (4) corners of the Intersection are currently occupied by office tenants only. IP-1-98

We must be clear that Warland's position is not that these concerns should outweigh the City's interests in redeveloping and modernizing portions of the Park, nor that the Goodman projects should not be redeveloped as planned. On the contrary, Warland believes that redevelopments such as – and including – the Goodman projects are critical to the overall success of the Park. However, as with any redevelopment project, the interests of the community, which in this case consists primarily of existing residential and commercial property owners and tenants, must be considered and addressed. Applicable law recognizes this and therefore requires that environmental studies performed in connection with a redevelopment paint an accurate picture of the overall impacts of any redevelopment so that existing owners in the surrounding area are able to provide the feedback necessary for you to make decisions with respect to appropriate mitigation measures. IP-1-99

In this case, applicable law requires the environmental studies for 5665 Plaza to not only contemplate that project as a single redevelopment, but to also address the cumulative impacts of both the Goodman projects (i.e., the redevelopments of 5665 Plaza and 5757 Plaza by Goodman). This is particularly relevant here, where Goodman acquired both 5665 Plaza and 5757 Plaza in September 2021 as a part of the same transaction and continues to own both parcels, which makes clear the potential for the three (3) new warehouse facilities to be placed on those parcels to be operated as a single project, either now or later. CEQA requires the City evaluate the short and long-term impacts to air quality, traffic and noise that will result from any proposed project, both individually and viewed cumulatively with other projects in the area, and mandates that those impacts be accurately communicated to the public so as to fully inform it of the potential impacts and allow for informed decision making. In omitting this cumulative impact analysis, the CEQA review performed this far with respect to the Goodman projects falls short of the legally required standard. IP-1-100

As we suggested in the enclosed letter, a simple way to minimize the Goodman projects' impacts to the Intersection and surrounding areas is to require that commercial vehicles with a gross vehicle weight rating (GVWR) exceeding 33,000 pounds (which are commonly known as "long haul" trucks) entering and exiting those projects use designated truck routes. Specifically, instead of being routed to Valley View Street via Plaza Drive (i.e., via the Intersection), those vehicles should be required to access and depart the Goodman projects utilizing Douglas Drive to Katella Avenue to the 605 freeway. This avoids problematic truck traffic at the Intersection, and is similar to requirements the City has historically IP-1-101

imposed on similar developments, including the Shaw Industries facility located at 11411 Valley View Street. IP-1-101

Again, we cannot emphasize strongly enough that Warland's goals are not to prevent Goodman from redeveloping 5665 Plaza and 5757 Plaza – Warland only wants to encourage you to take into account the reality of the environmental impacts of the Goodman projects, and to encourage you to seriously consider reasonable mitigation measures to address these impacts. Doing so benefits the existing owners within the Park, but it also (and more importantly) benefits the many residents that work in the Park and live in the City. We all have the same goal: Ensuring the Park's continued success. IP-1-102

We appreciate your time and consideration on these matters, and are happy to have more discussions on these issues in the coming months.

Regards,

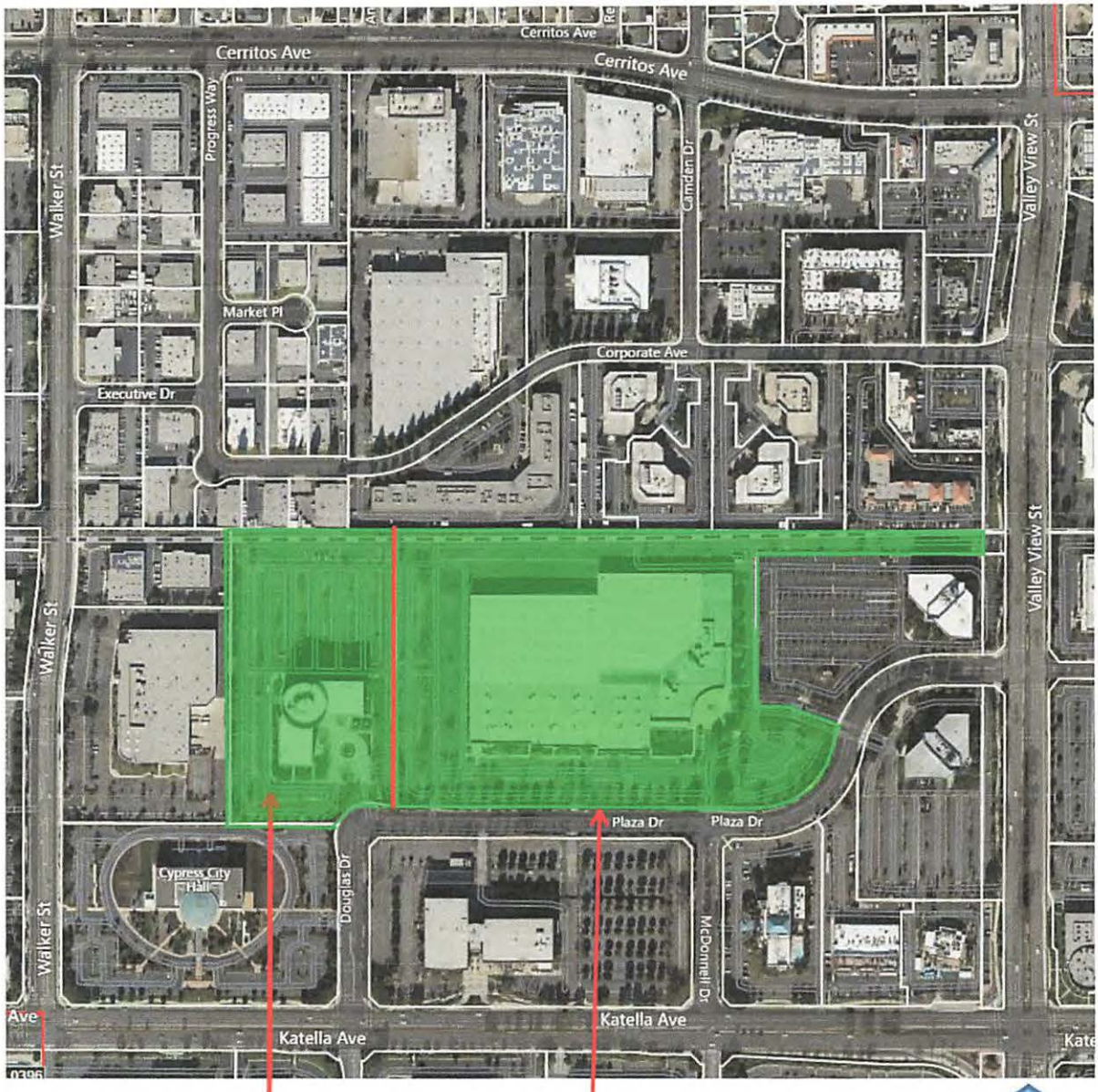
Allyssa J. Holcomb

Enc.

cc: Mr. Carl W. Robertson, Jr., Warland Investments Company *(via email)*
Ms. Hope Warschaw, Warland Investments Company *(via email)*
Mr. Peter Grant, City Manager, City of Cypress *(via email)*
Ms. Alicia Velasco, Planning Director, City of Cypress *(via email)*
Summer Nastich, Esq. *(via email)*

EXHIBIT A

Depiction of Goodman Projects



VICINITY MAP

GARRETT
STIEPEL RYDER LLP

Allyssa J. Holcomb
Direct Dial No.
(714) 384-4313
Email Address
aholcomb@garrettllp.com

April 10, 2023

VIA EMAIL (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: Goodman Commerce Center
5757 Plaza Drive
Cypress, California

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 City. Warland's presence in the City brings great value to the community by maintaining high-end facilities that draw first-class tenants. Currently, Warland has approximately 135 tenants within Warland/Cypress Business Center, which constitutes approximately half of the acreage within Cypress Business Park ("**Park**"). Those tenants collectively account for one of the largest employer bases in the City, and include local businesses as well as internationally recognized companies including Siemens Corporation, Rolls-Royce High Temperature Composites and Mitsubishi Electric. Warland is an interested party in the "Goodman Commerce Center" redevelopment project consisting of two (2) new primarily industrial facilities located at 5757 Plaza Drive, which is within one (1) block of the intersection of Plaza Drive/Chip Avenue and Valley View Street ("**Project**"), by virtue of Warland's holdings located near the proposed Project, the closest of which are located at 10800 and 10850 Valley View Street and 6100 Chip Avenue (i.e., at the intersection of Plaza Drive/Chip Avenue and Valley View Street), and several other buildings located within a few blocks of the Project. In that capacity, Warland offers the following comments in response to the Initial Study / Mitigated Negative Declaration for Goodman Commerce Center dated February 2023 ("**IS/MND**"), and specifically (a) that certain Goodman Commerce Center Traffic Analysis dated January 27, 2023 prepared by Urban Crossroads under Reference No. 14915-04A TA Report ("**January Traffic Study**"), (b) that certain Goodman Commerce Center Traffic Analysis dated February 9, 2023 under Reference No. 14915-06 TA Report ("**February Traffic Study**"), and (c) the memoranda dated March 21, 2023 (referencing Job No. 14915-08 RTC) and March 22, 2023 (referencing Job No. 14915-09 TG) to Alicia Velasco of the City of Cypress, from Charlene So from Urban Crossroads, Inc. relating to the discrepancies between the January Traffic Study and the February Traffic Study (each, "**Memorandum**"). Note that the March 21 version of the Memorandum is available on the City of Cypress website, while the March 22 version of the Memorandum was provided to Warland by Goodman under separate cover on March 24, 2023 but is not currently available on the City of Cypress website.

IP-1-103

Background

Warland was first advised of the Project on March 2, 2023 via email from Robert Ramirez, the City's Business Development Manager, which email included a link to a staff report prepared by Alicia Velasco in anticipation of the March 27, 2023 City Council meeting ("**Staff Report**"). The Staff Report stated that "(a)n Initial Study and Mitigated Negative Declaration (IS/MND) were prepared in accordance with CEQA guidelines and made available for a 20-day public review period from February 6 through February 27, 2023. No public comments were made prior to drafting the agenda report." The Staff Report included a link to the IS/MND, which referenced a Traffic Report attached as Appendix F, as well as certain other Project documents, but in fact neither the January Traffic Study nor the February Traffic Study were attached to the IS/MND nor included in the materials available in the Staff Report.

On March 13, 2023, Warland located the "Project Environmental Documents" regarding the Project on the City of Cypress website at https://www.cypressca.org/departments/community-development/planning-division/development-information, and downloaded from that site the document attached as "Appendix F – Traffic Report", which was the January Traffic Study. Today, that same link instead attaches the February Traffic Study. Warland did not receive notice of the new February Traffic Study until it questioned the results of the January Traffic Study, as detailed below. Further, but for the fact that Warland happened to access the City's website at some point after they were switched out, would never have known there was any change in the underlying data made available to the public for the City's CEQA analysis. IP-1-103

In early March 2023, prior to the Warland becoming aware of the new February Traffic Study, Warland reviewed the January Traffic Study—which, again, at that point was the only traffic study available to it—and provided comments to the City on March 16, 2023 regarding certain concerns with respect to the same—specifically that the January Traffic Study's conclusion that the Project would reduce the actual and "PCE"[1] truck traffic in the immediate area was obviously erroneous for the following reasons. First, the Project will contain, cumulatively, approximately 121,645 additional square feet of warehouse space, which is a nearly 50% increase in warehouse space from the current facility. Second, the Project is designed with fifty (50) dock high doors, which Warland understands is an approximately 67% increase in the number of dock high doors from the current facility. And, last, the January Traffic Study used different land use codes to evaluate the existing facility against the Project – specifically, it used ITE Land Use Code 150 (warehouse) to evaluate the existing facility and ITE Land Use Codes 154 (high cube short-term storage warehouse) to evaluate approximately 50% of the Project and ITE Land Use Code 158 (high-cube storage) to evaluate the remainder of the Project.[2] Typically, these land use codes would be expected to result in a significantly *increased* truck use than the one used for the existing facility. Given the increased warehouse space, substantially more dock high doors, and assumed higher intensity truck use, the January Traffic Study's conclusion that the truck traffic would be *reduced* daily by 234 actual trucks and 198 PCE trucks was clearly wrong. A few days after the conversation with the City, Warland later discussed these issues with representatives from Goodman, which admitted that the January Traffic Study had been in error with respect to the anticipated truck traffic because it misstated the truck traffic from the existing facility, and that the February Traffic Study corrected the issue. Per

[1] "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.
[22] "High cube warehouse" means buildings used for the storage of manufactured goods prior to their distribution. These facilities are typically characterized by a high level of mechanization (and, as a result, less employees) and increased truck activities occurring outside of the peak hours of the adjacent street system.

the February Traffic Study, the actual truck traffic is now expected to increase by 42 actual daily trips, a difference from the January Traffic Study of *276 actual daily truck trips*. This inaccuracy was further described in each of the March 21 and March 22 versions of the Memorandum. IP-1-103

Concerns

Warland wants to be clear that it feels strongly that appropriate redevelopment projects in the Park present a net positive for the Park and for the City by bringing more high-quality businesses and jobs into the community. Warland is therefore enthusiastic about the prospect of redevelopment of certain facilities within the Park. That said, Warland has significant concerns regarding CEQA compliance with respect to the Project, as well as the overall impacts of the Project given its specific location and intended truck routes. IP-1-104

A. CEQA Compliance

The CEQA guidelines mandate that the public receive notice and have a meaningful opportunity to review and respond to environmental reports generated related to proposed developments in the City. In this case, although the IS/MND was made available for public comment between February 6 and February 27, the traffic study made available at that time was the January Traffic Study, which significantly misrepresented the impact of the Project relative to truck traffic as compared to the existing facility. Assessing the Project based on, and only providing the public with, a clearly (and admittedly) inaccurate basis on which to evaluate the Project runs afoul of CEQA's intent and requirements that agencies evaluate the Project's actual environmental impacts, and that the public be given a meaningful chance to do the same. It is also irrelevant that the February Traffic Study was corrected prior to the expiration of the notice period, as the February Traffic Study was not readily available to the public (including Warland) until well after the end of the notice period, rendering the disclosures within it inadequate under CEQA. IP-1-105

In Warland's view, the errors in the January Traffic Study undermine the integrity of the February Traffic Study, which was performed by the same firm. While Warland would like to believe the error was made in good faith, the corrected February Traffic Study was produced for Warland only after Warland identified the issues in the January Traffic Study. The timing of the provision of the February Traffic Study calls into question the reliability of other data and conclusions in the January Traffic Study, most of which remained the basis for the conclusions in the February Traffic Study. As such, Warland urges the City Council to require a new traffic study from an independent third party to ensure that the short and long-term impacts to air quality, traffic and noise in the Park and surrounding areas due to the proposed Project, particularly when those impacts are viewed cumulatively with other projects in the area and are accurately represented so that the public is fully informed of the potential impacts of the Project and can make informed decisions accordingly. Also, given the City's failure to comply with CEQA as detailed above, Warland asks that the City provide a new notice period to allow for public review of, and comment on, the Project in light of the February Traffic Study.

B. Impacts to Neighboring Office and Residential Areas

The February Traffic Study and each Memorandum indicate that the Project will result in 42 additional daily truck trips, which is nearly 30% more truck trips than those associated with the existing facility if it was fully occupied. Further, 70% of the truck traffic from the Project will be routed to Valley View Street via Plaza Drive, where three (3) high end office buildings are located, with 30% of the overall IP-1-106

truck traffic from the Project continuing south on Valley View Street through a large residential area. This increased volume of truck traffic will invariably lead to noise, air pollution and safety hazards, including the following:

1. Significant greenhouse gas emissions from commercial vehicle source emissions.
2. Traffic impacts, including roadway hazards, from heavy commercial vehicle circulation within or near surrounding commercial projects.
3. Roadway noise impacts, including at night, from commercial vehicles.
4. Potential significant impacts to public services as to the new Project as well as interference with the provision of those services to the Park and surrounding areas, including the residential area located south of the Project.
5. Potential safety impacts to pedestrians and cyclists.

IP-1-106

The Park has been carefully designed to ensure that office buildings can be operated with minimal interference from nearby industrial facilities, which ensures the City remains attractive to both local and national companies for their office needs. Further, the City has historically made it a priority to ensure that heavier truck traffic has minimal impact on residential areas near the Park, which attracts business to the area while also contributing to a thriving residential community within the City.

In order for the Project to be consistent with the City's goals and to mitigate potential negative impacts of the Project on nearby office buildings and residential areas, Warland recommends that the City require that commercial vehicles entering and exiting the Project, which have a gross vehicle weight rating (GVWR) exceeding 33,000 pounds, use specified designated truck routes. Specifically, instead of being routed to Valley View Street via Plaza Drive, those vehicles should be required to access and depart the Project utilizing Douglas Drive to Katella Avenue to the 605 freeway, which is similar to designated truck routes the City has required as a condition of approval for other nearby industrial projects, such as the Shaw Industries facilities located at 11411 Valley View Street.

C. Project Design and 3PL Use

Warland understands that no specific users of the Project facilities have been identified; however, the design of the buildings, which substantially increase warehouse space and dock high doors, is well suited for smaller scale third party logistics ("**3PL**") uses. Such uses could significantly increase commercial truck traffic, particularly with respect to the volume of smaller trucks traveling short distances. While an argument can be made that any use that is not currently permitted by the applicable specific plan will require a conditional use permit and thus will have to complete a necessary environmental review process, including traffic studies, the City is also in the process of evaluating the current specific plans for the Park with the intention of adopting a new specific plan. That new specific plan could permit uses that are not currently contemplated by the existing specific plan applicable to the Project, which would then circumvent the need for a conditional use permit for a heavier truck use later on.

IP-1-107

Given the particular design of the Project, as well as the potentially changing landscape of the specific plans at the Park, Warland suggests restricting any 3PL use of the Project now to avoid future issues.

Conclusion

Warland strongly believes that balancing the need for economic growth and job creation with maintaining a safe and healthy environment for all current and future residents can be achieved by being

IP-1-108

supportive of redevelopment projects such as the Project, provided that the reasonable and foreseeable impacts of the same are mitigated by measures such as those described above. Accordingly, Warland requests (1) a new traffic study for the Project be performed by an independent third party to confirm the results of the February Traffic Study (note that at a minimum, a new notice period must be established under CEQA to allow for public review of the February Traffic Study), (2) designated heavy truck routes be established to minimize potential impacts to nearby office buildings and the residential area located south of the Project on Valley View Street, and (3) any 3PL uses of the Project be restricted. IP-1-108

Warland reserves all rights and remedies associated with the Project, the IS/MND, the January Traffic Study, the February Traffic Study, each Memorandum and the analysis and conclusions presented therein.

Please call with any questions.

Regards,

Allyssa J. Holcomb/HD

Allyssa J. Holcomb

cc: Mr. Carl W. Robertson, Jr., Warland Investments Company (via email)
Ms. Hope Warschaw, Warland Investments Company (via email)
Mr. Peter Grant, City Manager, City of Cypress (via email)
Ms. Alicia Velasco, Planning Director, City of Cypress (via email)
Summer Nastich, Esq. (via email)

2.4 Paul Hastings (On Behalf of Warland Investments Company and Affiliated Entities)

Letter Code: IP-1
Date: September 27, 2024

Response to Comment IP-1-1

This comment provides introductory remarks and summarizes the proposed project.

The City acknowledges this comment. Because the comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR, no further response is required.

Response to Comment IP-1-2

The commenter claims the City has impermissibly allowed for the piecemealed environmental review of what it claims is a single project, namely the redevelopment of adjacent parcels located at 5757 Plaza Drive and at 5665 Plaza Drive, the location of this proposed project. The commenter claims evidence in the record establishes the applicant has always intended to develop these properties to operate as a single project. To support this contention the commenter notes 5665 Plaza and 5757 Plaza were purchased by the applicant on the same day as part of the same transaction, with the intent of developing both properties as a single, approximately 600,000 square foot 3-building logistics center with 75 dock doors.

The commenter claims are based upon limited and misleading information. The applicant purchased both of the parcels located at 5757 Plaza Drive and 5665 Plaza Drive, respectively, because they were owned by the same entity who had placed both properties for sale. According to information received from the applicant, at the time of the applicant's purchase of the properties on September 15, 2021, the office building located at 5665 Plaza Drive had six tenants: Toyo Tires, Murphy, Murphy & Murphy, Inc, Beacon CBHM, LLC, Bar Bakers, LLC, United Healthcare, and Albena Newco, LLC. Toyo Tires leased approximately 46,000 square feet of office space, which amounted to nearly a third of the space in the 150,626-square-foot building. At the time, Toyo Tire's lease was set to expire on October 31, 2022. However, Toyo Tires had two additional 5-year lease extension options that could have extended the lease's term to October 31, 2032. Furthermore, soon after acquiring 5665 Plaza Drive, the applicant entered into a listing agreement with CBRE to market the building with a term of October 1, 2021, until September 30, 2022, indicating the applicant's desire to continue to lease the office building to new tenants. This was the status of the office building at 5665 Plaza Drive at the time the applicant submitted development applications to the City to redevelop the 5757 Plaza Drive property by demolishing an existing 336,643-square-foot warehouse and constructing two warehouse buildings totaling approximately 390,000 square feet. Considering the uncertainty as to when the leases of office space at 5665 Plaza Drive would expire, it is reasonable to conclude that at that time, the nature, scope and timing of any future redevelopment of that site was speculative, at best.

In the context of phased development, "an EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects. Absent these two circumstances, the future expansion need not be considered in the EIR for the proposed project." Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal.3d 376, 396. The first part of this test is not met here. At the time of the preparation of the Initial Study to analyze the redevelopment of 5757 Plaza Drive in late 2022 leading to the publication of the Initial Study and Mitigated Negative Declaration in February 2023, the City was not aware of any plans by the applicant to redevelop 5665 Plaza Drive. Based upon the evidence above regarding the existing tenancies at 5665 Plaza Drive, it would appear any redevelopment was speculative. Furthermore, the plans the applicant submitted for the redevelopment of 5757 Plaza Drive showed a fully functional two warehouse configuration that did not depend on any additional development at 5665 Plaza Drive to operate. Accordingly, the redevelopment of 5665 Plaza Drive was not a reasonably foreseeable consequence of the redevelopment of 5757 Plaza Drive.

As noted in the Draft EIR, the project to redevelop 5757 Plaza Drive, known as the "The Goodman Commerce Center" is an independent, cumulative project. The proposed project at 5665 Plaza Drive is on a separate parcel and has independent utility. The Goodman Commerce Center project was designed to function as an independent development, with all required public and private improvements (such as internal accessways and driveways). It did not necessitate or compel the proposed project. (Aptos Council v. County of Santa Cruz (2017) 10 Cal.App.5th 266, 280 ["when each action has independent utility and does not subsume or necessitate each other, the actions may properly undergo separate environmental review"].) The proposed project can likewise function independently and proposes all necessary on-site and off-site improvements needed to ensure proper operation of the proposed 191,394-square-foot light industrial building. The holdings in numerous cases support the fact that no improper piecemealing has occurred with regard to the proposed project at 5665 Plaza Drive, including the following. In McCann v. City of San Diego (2021) 70 Cal.App.5th 51, 85, the court held a city could separately consider different utility undergrounding projects because each project was separately approved and independently functional of the other projects. In Banning Ranch Conservancy v. City of Newport Beach (2012) 211 Cal.App.4th 1209, the court determined the City of Newport Beach had not piecemealed the environmental review of a proposed project to develop a new park and a proposed private residential development project even though both projects would improve and utilize the same access road. In holding that no impermissible piecemealing had occurred, the court determined the park project had independent utility as the city intended to move forward with that project regardless of whether the private residential development project moved forward. Banning Ranch, supra, at p. 1226. In the same vein, the project approved for 5757 Plaza Drive was capable of operating independently regardless of whether 5665 Plaza Drive was ever redeveloped with a warehouse, which appeared speculative at the time due to the number and terms of the existing leases at that office building.

For these reasons, the City of Cypress believes the record supports the City's environmental analysis of the redevelopment of 5757 Plaza Drive as a standalone project and its separate analysis of the redevelopment of 5665 Plaza Drive including the 5757 Plaza Drive Project as a related project for purposes of analyzing cumulative impacts.

The commenter outlines their prior correspondence claiming that the proposed project is not a standalone project. The commenter asserts that the materials previously published by the City of Cypress with respect to the redevelopment of the project site and the redevelopment of the Goodman Commerce Center Project, which is located immediately east of 5665 Plaza Drive at 5757 Plaza Drive support the commenter's claim that the applicant's proposed projects at 5665 and 5757 Plaza Drive and would operate as a single project.

Response to Comment IP-1-3

The commenter notes that it engaged the EcoTierra Consulting and Ganddini Group to review the Draft EIR and claims that both firms identified critical errors, which render its conclusions invalid. The commenter claims that these deficiencies necessitate the circulation of a revised Draft EIR for public review to ensure transparency and accurate understanding of the project's impacts. The commenter states that failure to address these issues could lead to costly and lengthy litigation against any project approval.

The City acknowledges this comment. Because the comment does not contain any specific comments or questions about the environmental analysis or conclusions contained in the Draft EIR, no further response is required.

Response to Comment IP-1-4

The commenter claims that the Draft EIR fails to accurately identify the nearest sensitive receptor sites, particularly with respect to its evaluation of air quality. The commenter recommends that the Draft EIR be revised to address potential impacts to the nearest sensitive receptors and recirculated.

The City acknowledges this comment**.** Page 4.1-28 in Section 4.1, Air Quality, of the Draft EIR identifies the nearest sensitive receptors to be the residential uses located north of the project site, approximately 1,398 feet from the project site boundary.

Pages 4.1-28 and 4.1-29, in Section 4.1, Air Quality, of the Draft EIR provide an assessment of health risks associated with the proposed project in which a localized significance threshold (LST) analysis was prepared to evaluate potential ambient concentrations of pollutants to nearby sensitive receptors. As identified in Tables 4.1.9, Construction Localized Emissions, and 4.1.10, Operational Localized Emissions, of the Draft EIR, the proposed project's on-site maximum localized construction and operational emissions would be below the South Coast AQMD's localized significance thresholds, and no significant health risk would occur. As such, the Draft EIR correctly identifies the nearest sensitive receptors and evaluates the health risk associated with the proposed project. Please also refer to Response to Comment IP-1-32 for a detailed description of sensitive receptors.

Response to Comment IP-1-5

The commenter claims that the proposed project failed to assess potential health risks associated with the concentrated operation of diesel-fueled trucks on the project site. The commenter also claims that the Draft EIR provides no analysis or other substantial evidence that emissions from diesel truck operations on-site would not expose sensitive receptors to substantial pollutant concentrations.

The City acknowledges this comment. The Draft EIR provided an assessment of health risk associated with the project on pages 4.1-28 and 4.1-29. As identified in Tables 4.1.9 and 4.1.10 of the Draft EIR, the proposed project's on-site maximum localized construction and operational emissions would be below the South Coast AQMD's localized significance thresholds and no significant health risk would occur. Additionally, as described on page 4.1-25 of the Draft EIR, the air quality analysis accounts for all vehicle and truck trips associated with the proposed project and conservatively assumed that that all trucks of all sizes would have diesel-powered transportation refrigerated units (TRUs). This is a conservative assumption because diesel engines typically have higher emissions compared to alternative fuel options, and TRUs release additional emissions when operating. By assuming that all trucks would have diesel TRUs, the analysis provides a more comprehensive estimate of potential emissions, representing a worst-case scenario. Additionally, the analysis conservatively assumed, that the TRUs would be operational for up to 15 minutes per day. 15 minutes is a conservative estimation of operational time for TRUs, as it represents a three-times exceedance of the California Air Resources Board's (CARB) anti-idling rules, which prohibit idling for more than 5 minutes. It is likely that TRU truck emissions would be lower since truck operators will have access to plug-in power to operate the TRUs and will be incentivized to do so based on their own fuel costs and compliance with the CARB TRU Airborne Toxic Control Measure (ATCM). Furthermore, as shown in Table 4.1.8, Project Operational Emissions, of the Draft EIR, the proposed project would not result in substantial mobile source emissions or TRU truck emissions and total project operational emissions would be well below the South Coast AQMD thresholds. Therefore, the proposed project would not result in significant mobile source emissions that would impact sensitive receptors. Please refer to Response to Comment IP-1-33 for a detailed discussion of sensitive receptors.

Response to Comment IP-1-6

The commenter recommends that an operational health risk assessment be prepared for the proposed project to evaluate the potential health risks to sensitive receptors located in the vicinity of the project resulting from the operation of diesel-fueled trucks on the project. The commenter claims that the Draft EIR should be revised and recirculated.

The City acknowledges this comment. Please refer to Response to Comment IP-1-33.

Response to Comment IP-1-7

The commenter states that the City, as the Lead Agency overseeing the project, has the responsibility to demonstrate that emissions of Diesel Particulate Matter (DPM) from the project's operations will not pose a risk to public health.

Please refer to Response to Comment IP-1-33. As described in that response, the proposed project would not expose sensitive receptors to substantial levels of TACs and a significant health risk would not occur.

Response to Comment IP-1-8

The commenter claims that the Goodman Commerce Center Project and the proposed project would constitute an additional source of DPM emitted by trucks and truck refrigeration units and that the DPM is the Toxic Air Contaminant (TAC) most associated with warehousing uses. The commenter also claims that the Draft EIR fails to include a cumulative operational health risk assessment encompassing emissions from both the proposed project and the Goodman Commerce Center Project to assess the potential cumulative health risks resulting from the operation of the warehouse projects immediately adjacent to one another. The commenter recommends that the Draft EIR should be revised to reflect the cumulative operational health risk assessment and recirculated.

The City acknowledges this comment. There is no methodology to quantify the cumulative areawide or localized health risks within a community-wide area. The South Coast AQMD's recommended thresholds of significance apply to individual development projects and evaluate the incremental increase in emissions from a proposed source. The thresholds do not apply to cumulative impacts. The City relies on the South Coast AQMD's recommended methodology to evaluate cumulative impacts, which is to conclude that an impact considered to be significant on a project-specific basis would also result in a significant cumulative impact. In developing thresholds of significance for air pollutants, the South Coast AQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified South Coast AQMD significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. As shown in Tables 4.1.9 and 4.1.10 of the Draft EIR, the proposed project would not result in an exceedance of a South Coast AQMD LST during project construction or operation. As such, the proposed project would not result in a cumulative air quality impact and would not expose sensitive receptors to substantial levels of TACs. Please refer to Response to Comment IP-1-33 for a more detailed discussion on sensitive receptors and TACs.

Response to Comment IP-1-9

The commenter claims that the Draft EIR fails to assess potential health risks associated with the operation of diesel fuel trucks that are off-site, travelling to and from the project site, and the trucks accessing Valley View, located adjacent to numerous residential neighborhoods and the Frank Vessels Elementary School. The commenter recommends that Draft EIR be revised to reflect the results of this analysis and recirculated.

The City acknowledges this comment. Please refer to Response to Comment IP-1-36.

Response to Comment IP-1-10

The commenter notes that the Draft EIR does not adequately identify adverse impacts to protected trees, lacking analysis of potential work activities affecting street trees. They commenter recommends that the Draft be revised and recirculate.

The City acknowledges this comment. Please refer to the Response to Comment IP-1-37.

Response to Comment IP-1-11

The commenter claims that the proposed project does not provide sufficient evidence that the proposed project would not conflict with the stated goals of the SCAG 2020-2045 RTP/SCS related to Greenhouse Gas (GHG) Reduction Plans. The commenter also claims that the proposed project fails to take into consideration the City of Los Alamitos. The commenter recommends that Draft EIR be revised to analyze the consistency of the proposed project with all relevant goals and policies of the RTP/SCS related to reduction of GHG emissions and recirculated.

The City acknowledges this comment. Please refer to Response to Comment IP-1-38.

Response to Comment IP-1-12

The commenter claims that the Draft EIR incorrectly characterized the existing noise environment and improperly calculated the impacts of construction noise at the proposed project site. The commenter also claims that the noise measurement locations used in the Draft EIR do not consider the noise impact at critically affected sensitive receptors (i.e., schools, medical centers, and residential communities). The commenter recommends that Draft EIR be revised to correctly reflect the construction noise impacts and recirculated.

The City acknowledges this comment. Please refer to Responses to Comments IP-1-40 and IP-1-41.

Response to Comment IP-1-13

The commenter claims that the Draft EIR fails to identify the route that will be utilized by haul trucks during construction and does not assess impacts of hauling activities near sensitive receptor sites. The commenter recommends that the Draft EIR be revised to reflect potential impacts of hauling activities on nearby sensitive receptors and recirculated.

The City acknowledges this comment. The expected volume of haul truck trips during the demolition phase would be 30 heavy trucks based on the modeling completed in CalEEMod for the air quality analysis. The City's truck haul routes are along major arterials including Katella Avenue and Valley View Street. The minimum traffic volume along the streets near the project site is 31,200 average daily trips (ADT) based on the City's Circulation Element. With an increase of 30 heavy trucks, the estimated noise increase would be less than 0.02 A-weighted decibel (dBA) Community Noise Equivalent Level (CNEL). Given that human beings are unable to perceive noise level increases of 3 dBA or less, there would be no perceptible noise level increase to any of the land uses along the haul routes during construction, including residential uses. Please also refer to Response to Comment IP-1-43.

Response to Comment IP-1-14

The commenter claims that the vibration impacts of DDC are inconsistently addressed in the Draft EIR, and that additional details regarding the parameters and locations of where DDC is to take place is necessary. The commenter recommends that the Draft EIR be revised to provide confirmation in whether DDC will be used during construction and to provide required additional details.

The City acknowledges this comment. Please refer to Response to Comment IP-1-44.

Response to Comment IP-1-15

The commenter claims that the Draft EIR fails to provide proper analyses of potential impacts on human annoyance from, or noise impacts of, DDC at the Project. The commenter recommends the Draft EIR be revised to include such analyses.

The City acknowledges this comment. Please refer to Response to Comment IP-1-46.

Response to Comment IP-1-16

The commenter states that the proposed project and the adjacent Goodman Commerce Center project have similar uses by the same applicant, and that consideration of the two projects as one large project would have a great impact, warranting a larger study area per the City's Traffic Study Guidelines. The commenter claims that the projects have been "piecemealed" to avoid analysis of a single larger project.

The City acknowledges this comment. Please refer to Response to Comment IP-1-2.

Response to Comment IP-1-17

The commenter claims that the Draft EIR does not accurately describe or depict the existing and/or proposed conditions. The commenter claims there are inconsistencies between the trip distribution patterns at the proposed project.

Please see Response to Comment IP-1-61.

Response to Comment IP-1-18

The commenter claims that the Draft EIR references outdated and unreliable sources and methodologies, fails to identify the source of certain assumptions, and/or presents incorrect results. The commenter states that there is a recent Traffic Analysis published by the City in January 2024 that the Draft EIR should rely on instead of the November 2023 Traffic Analysis prepared by Urban Crossroads. The commenter recommends that the Draft EIR be revised to address the latest version of the Traffic Analysis.

Please see Response to Comment I-1-55.

Response to Comment IP-1-19

The commenter states that the January 2024 Traffic Analysis shows truck turning templates that present a potential traffic hazard. The commenter recommends that the Draft EIR be revised to demonstrate that trucks can complete a specific truck-turn movement without causing the identified traffic hazard.

Please see Response to Comment IP-1-63.

Response to Comment IP-1-20

The commenter states that the City's scoping agreement set forth in Appendix 1.1 of the Traffic Analysis promises to provide a safety assessment of the study area. The commenter states that no such safety assessment was included in the Draft EIR/Traffic Analysis.

Please see Response to Comment IP-1-63.

Response to Comment IP-1-21

The commenter states that the City's Transportation Operational Assessment Guidelines and industry standards require transportation analyses to use traffic counts that are less than a year old. The commenter states that the Draft EIR uses traffic counts from 2022 and 2023 and recommends that the Draft EIR be revised to reflect new traffic counts taken in 2024.

Please see Response to Comment IP-1-52.

Response to Comment IP-1-22

The commenter states that the environmental baseline VMT should correspond to the conditions at the time environmental analysis is prepared. The commenter claims that the environmental baseline VMT should be 2024, however the Draft EIR uses 2020.

The City acknowledges this comment. VMT analysis conducted using model base year typically provides a more conservative estimate for project VMT profile. This is because, with new land use developments, the trip lengths for project trips tend to diminish. Therefore, as a conservative estimate, model base year (2016 for the Orange County Transportation Analysis Model [OCTAM]) has been used to determine the regional threshold and project VMT. It should be noted that though the City is yet to develop its own VMT guidelines, this methodology is consistent with the VMT analysis methodologies of the County of Orange.

Response to Comment IP-1-23

The commenter claims that the Draft EIR contemplates only one potential use of the facility despite identifying no ultimate tenant. The commenter claims that the Draft EIR/Traffic Analysis underestimates the trip generation and total volumes for future conditions. The commenter recommends that the Draft EIR/Traffic Analysis be revised to accurately consider trip generations for the "worst-case" potential tenants.

Please see Response to Comment I-1-56.

Response to Comment IP-1-24

The commenter claims that the revisions recommended above, would affect key assumptions regarding the project's trip generation and affect the need for further analysis and assumptions of the noise and greenhouse gas emissions impact analyses. The commenter recommends that the Draft EIR be revised and recirculated.

The City acknowledges this comment. Please refer to Responses to Comments IP-1-2 through IP-1-23.

Response to Comment IP-1-25

The commenter notes that the VMT Calculation Worksheet attached to the Draft EIR was modified after the same was originally published by the City, without any change to the date of the previously published document, nor any indication that the document had been modified. The commenter questions the accuracy of reports previously published in connection with the IS/MND for the proposed project.

The City acknowledges this comment. The project name in Appendix A of the VMT Calculation Worksheet was updated in the Draft EIR to "5665 Plaza Drive", to accurately represent the name of the proposed project. The reports published for the proposed project are accurate and correct.

Response to Comment IP-1-26

The commenter claims that the Draft EIR assumes a total employment number without documenting the original land use and conversion factors applied to determine such input.

The City acknowledges this comment. Page 4.7-13, Section 4.7 Transportation, discusses the land use-to-employee conversion factors. Typically, the employment estimates for non-residential projects are developed using the available data for similar land uses in the vicinity or within the region. Recently, the City has approved the neighboring Goodman Commerce Center project, which included 350,268 square feet of warehouse space and 20,000 square feet of office space. The Goodman Commerce Center Project is estimated to have approximately 190 employees. As such, this project is estimated to have approximately 0.51 employees per thousand square feet (tsf). Given the project is estimated to have similar operational characteristics to that of the Goodman Commerce Center Project, the employees per tsf rate from the Goodman Commerce Center project was applied to this project's square footage to develop the project's employment estimate.

Response to Comment IP-1-27

The commenter states that as the Lead Agency, the City has the responsibility to ensure the studies and methodologies used in preparing the Draft EIR are up to date and consistent with City and County guidelines, and industry standard practices. The commenter states that the City must revise and recirculate the Draft EIR to fulfill its CEQA obligations.

The Draft EIR for the proposed project was prepared in accordance with CEQA and the State CEQA Guidelines, ensuring a thorough evaluation of the project's potential environmental impacts. The environmental studies and methodologies used in preparing the Draft EIR were prepared using the most current methodologies and are consistent with both applicable City and County guidelines. All studies in the Draft EIR have been reviewed by the lead agency prior to circulation of the Draft EIR. Additions and corrections made to the Draft EIR are presented in the Errata provided in Section 3.0, Errata, of this Final EIR. Therefore, revision to the technical analyses requiring recirculation of the Draft EIR is not warranted.

Response to Comment IP-1-28

The commenter claims that the issues identified in the peer review reports were foreseeable considering the improper piecemealing of the proposed project and the Goodman Commerce Center Project. The commenter requests that the City cure the issues identified in the enclosed peer review reports.

The City acknowledges this comment. Please refer to Response to Comment IP-1-2.

Response to Comment IP-1-29

The commenter states that, as a Lead Agency, the City is responsible for following CEQA guidelines in its revised analysis and the City has a duty to be transparent with the community of Cypress when doing so. The commenter encourages the City to proceed as required by CEQA and other applicable laws.

The City acknowledges this comment. The Draft EIR for the proposed project was prepared in accordance with CEQA and the State CEQA Guidelines, ensuring a thorough evaluation of the project's potential environmental impacts. The City of Cypress has followed the State CEQA Guidelines and all applicable laws. Please refer to Response to Comment IP-1-2 for more details.

Response to Comment IP-1-30

This comment provides concluding remarks regarding the project and the Lead Agency's role in following CEQA guidelines in its revised analysis.

The City acknowledges this comment and thanks the commenter for their input.

Response to Comment IP-1-31

This comment provides introductory remarks from EcoTierra Consulting Inc. about their peer review of the proposed project. This comment states that EcoTierra's peer review contains review of the IS/MND prepared for the adjacent Goodman Commerce Center Project.

The City acknowledges this comment. Because the comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR, no further response is required.

Response to Comment IP-1-32

The commenter states that the proposed project identifies the nearest sensitive receptors as the residential homes located 1,398 feet to the north. The commenter claims that the statement is contradicting with the Goodman Commerce Center IS/MND which states that the nearest sensitive receptor is a medical center located 960 feet from the Goodman Commerce Center Project site. The commenter recommends the Draft EIR for the proposed project should be revised to reflect potential impacts to this sensitive receptor.

The South Coast AQMD defines structures that house persons (e.g., children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise) or places where they gather (i.e., residences, schools, playgrounds, child-care centers, convalescent centers, retirement homes, and athletic fields) as sensitive receptors. As identified on page 4.1-28 of the Draft EIR, the nearest sensitive receptor for air quality emissions is the residential home located north of the project site at approximately 1,398 feet from the project site boundary line. The proposed project is surrounded primarily by commercial, and office uses. Existing medical offices, such as the medical center referenced in the Goodman Commerce Center IS/MND document, are located within 1,000 feet of the proposed project. However, the medical center is a medical office use center and does not accommodate patients overnight. Residential receptors are more sensitive to air quality conditions because people generally spend longer periods of time at their residences, with greater associated exposure to ambient air quality conditions. However, to be conservative, the medical office center was added to the Draft EIR as a sensitive receptor for air quality emissions. Please refer to Section 3.0, Errata, for a description of these revisions.

Response to Comment IP-1-33

The commenter states that Pages 4.1-28 and 4.1-29 of the Draft EIR assess potential health risks associated with construction and operational emissions based on the South Coast AQMD Localized Significance Threshold methodology. The commenter claims that the Draft EIR fails to assess potential health risks associated with the concentrated operation of diesel-fueled trucks on the project site.

The City acknowledges this comment. As discussed on pages 4.1-28 and 4.1-29 of the Draft EIR, a localized significance threshold (LST) analysis was prepared for the proposed project to evaluate potential ambient concentrations of pollutants to nearby sensitive receptors. Based on the South Coast AQMD's Final Localized Significance Threshold Methodology[8], South Coast AQMD staff developed LSTs similar to the regional significance thresholds, which are based on the pounds of emissions per day generated by a proposed project that would cause or contribute to adverse localized air quality impacts. Emissions were assumed to be uniformly distributed across a flat proposed project site over an 8-hour workday. Receptor distances are measured in meters from the proposed project boundary. The same emissions estimated for regional significance thresholds should be compared to allowable emissions presented in the LST lookup tables for the source/ receptor area closest to the proposed project. Based on the South Coast AQMD's Methodology, screening procedures are by design conservative; that is, the predicted impacts tend to overestimate the actual impacts. If the predicted impacts are acceptable using the LST approach presented, then a more detailed evaluation is not necessary. As identified in Tables 4.1.9 and 4.1.10 of the Draft EIR, the proposed project's on-site maximum localized construction and operational emissions would be below the South Coast AQMD 's localized significance thresholds.

[8] South Coast Air Quality Management District (South Coast AQMD). 2008. *Final Localized Significance Threshold Methodology.* July. Website:http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf (accessed October 2, 2024).

In addition, the South Coast AQMD *CEQA Air Quality Handbook*[9] states that emissions of toxic air contaminants (TACs) are considered significant if a health risk assessment (HRA) shows an increased cancer risk of greater than 10 in 1 million. The OEHHA *Air Toxic Hot Spots Program Risk Assessment Guidelines*[10] has determined that long-term exposure to diesel exhaust particulates poses the highest cancer risk of any TAC it has evaluated. In addition, CARB has also identified DPM emitted by off-road, diesel-fueled engines emit DPM as a TAC.[11] As such, the TAC of concern would be DPM associated with the use of diesel engines during project construction. For risk assessment procedures, the OEHHA specifies that the surrogate for whole diesel exhaust is DPM. HRA analyses typically use PM_{10} emissions to represent DPM emissions, consistent with OEHHA guidance. As shown in Table 4.1.7 of the Draft EIR, PM_{10} emissions, which are a surrogate for TAC emissions during construction, would be 9.0 pounds per day, which is well below the South Coast AQMD threshold of 150 pounds per day, indicating that significant mass emissions of PM_{10} would not occur and a significant health risk would also not occur. Additionally, as shown in Table 4.1.8 of the Draft EIR, once operational, the proposed project would result in a total of PM_{10} emissions of 4.9 pounds per day or a net total of 2.7 pounds per day, which is also well below the South Coast AQMD threshold of 150 pounds per day, indicating that significant mass emissions of PM_{10} would not occur. Therefore, the proposed project would not generate a substantial amount of DPM emissions from off-road equipment use or truck idling that would result in the generation of a substantial amount of TACs and a significant health risk would not occur. Furthermore, the nearest sensitive receptors are located at approximately 1,398 feet from the project site, this distance is sufficient that particulate matter would settle prior to reaching the nearest sensitive receptor. Therefore, the proposed project would not expose sensitive receptors to substantial levels of TACs.

Response to Comment IP-1-34

The commenter claims that the project can be reasonably characterized as a warehouse/distribution center and therefore, the Draft EIR must provide an operational health risk assessment. The commenter further claims that the Draft EIR does not provide analysis or substantial evidence that emissions from diesel truck operations on-site would not expose sensitive receptors to substantial pollutant concentrations. The commenter recommends that the Lead Agency documents that DPM emissions from project operations would not represent a risk to public health, and claims that the closest the Draft EIR comes to acknowledging this potential impact is by stating that DPM is emitted by trucks and that DPM is a TAC most associated with warehousing uses. The commenter claims that the CARB Diesel Risk Reduction Plan mentioned in the Draft EIR does not address risks at any specific project site. The commenter recommends that the Draft EIR be revised and recirculated to provide the public an opportunity to review the City's justification for the conclusion of Less Than Significant Impact with respect to exposing sensitive receptors to substantial pollutant concentrations.

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9 South Coast Air Quality Management District (South Coast AQMD). 1993. CEQA Air Quality Handbook. Website: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook (1993). (accessed October 2, 2024).

10 California Office of Environmental Health Hazard Assessment (OEHHA). 2015. *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*. March. Website: https://oehha ca.gov/air/air-toxics-hot-spots (accessed October 2, 2024).

11 California Air Resources Board (CARB). 2022. *Proposed Amendments to the In-Use Off-Road Diesel-Fueled Fleets Regulation.* November 17. Website: https://ww2.arb.ca.gov/sites/default/files/barcu/board/res/2022/res22-19.pdf (accessed October 2, 2024).

The City acknowledges this comment. As discussed on pages 4.1-28 and 4.1-29 of the Draft EIR, a localized significance threshold (LST) analysis was prepared for the proposed project to evaluate potential ambient concentrations of pollutants to nearby sensitive receptors. Based on this localized analysis, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. In addition, the proposed project would generate 406 average daily trips, including 78 heavy duty truck trips. The proposed project is also anticipated to generate fewer than 50 net new peak-hour trips and fewer than 25 net new peak-hour trips at any single intersection. Since the proposed project would contribute to fewer than 50 peak hour trips and would generate less than 100 heavy truck trips, it would not result in a substantial number of vehicles or trucks that would warrant an operational health risk assessment. As shown in Table 4.1.8, emissions associated with operation of the proposed project would not be expected to exceed the most stringent applicable federal or State ambient air quality standards. It should be noted that the ambient air quality standards are developed and represent levels at which the most susceptible persons (children and the elderly) are protected. In other words, the ambient air quality standards are purposefully set low to protect children, the elderly, and those with existing respiratory problems. Furthermore, based on the CARB Land Use Handbook[12] recommendations, research studies have shown that approximately 80 percent of DPM emissions drop-off in pollutant concentration at approximately 1,000 feet from a distribution center. Although the proposed project would be a warehouse and would not have the intensive truck activity seen at a distribution center, the nearest sensitive receptor to the project site is located at approximately 1,398 feet away. At this distance, air pollutant concentrations would have dispersed prior to reaching the nearest sensitive receptor. Therefore, the project would not expose sensitive receptors to substantial levels of pollutant concentrations. Please refer to Responses to Comments IP-1-32 and IP-1-33 for a more detailed discussion of cumulative impacts and health risk impacts to nearby sensitive receptors.

Response to Comment IP-1-35

The commenter claims that a cumulative operational health risk assessment encompassing emissions from both the proposed project and the Goodman Commerce Center Project be prepared to assess the potential risks resulting from the operation of these two warehouse projects located adjacent to one another. The commenter further claims that the cumulative impact analysis provided in Section 4.1.10 of the Draft EIR does not address this potential impact, and incorrectly states that the only cumulative air quality impacts are those that occur across an air basin. The commenter recommends that the Draft EIR be revised and recirculated to provide the public an opportunity to review the City's justification for the conclusion of less than significant Impact with respect to exposing sensitive receptors to substantial cumulative pollutant concentrations.

The City acknowledges this comment. Currently, there is no methodology to quantify the cumulative areawide or localized health risks within a community-wide area. In developing thresholds of significance for air pollutants, the South Coast AQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified South Coast AQMD significance thresholds, its emissions would be cumulatively considerable,

[12] CARB. 2005. Air Quality and Land Use Handbook: A Community Perspective. April. Website: ARB's Community Health: 2005-04-00 ARB's Air Quality and Land Use Handbook: A Community Health Perspective (aqmd.gov) (accessed October 2024).

resulting in significant adverse air quality impacts to the region's existing air quality conditions. As demonstrated in the Air Quality section of the Draft EIR, the proposed project would generate operational emissions that are below the South Coast AQMD's thresholds. As such, the proposed project would not result in a cumulative air quality impact and additional analysis to assess cumulative impacts is not required. Please refer to Response to Comment IP-1-2 for additional details.

Response to Comment IP-1-36

The commenter claims that the Draft EIR fails to assess potential health risks associated with the operation of diesel-fueled trucks traveling to and from the project site. The commenter further claims that the health risk assessment must include receptors located along Valley View Street where trucks accessing the site from the north would likely travel along. The commenter recommends that the Draft EIR be revised and recirculated to provide the public an opportunity to review the City's justification for the conclusion of Less Than Significant Impact with respect to exposing sensitive receptors to substantial pollutant concentrations.

The City acknowledges this comment. As described on pages 4.7-12 and 4.7-14 of the Draft EIR, the proposed project is likely to generate fewer than 50 net new peak-hour trips and fewer than 25 net new peak-hour trips at any single intersection. Since the proposed project would contribute to fewer than 50 peak hour trips at the intersection of Valley View and Katella Avenue, it would not be anticipated that a substantial number of vehicles or trucks would impact Valley View Street when compared to existing conditions.

In addition, the distribution analysis assumes that approximately 30 percent of the proposed project's total truck trips would travel eastbound on Katella Avenue toward Valley View Street. However, it does not specify the expected north or south movements on Valley View Street. This omission is reasonable and consistent with CEQA as detailed below.

The proposed project is estimated to generate approximately 144 daily truck trips. With 30 percent of those trips, approximately 43 trips, occurring throughout the day, 43 daily trips is below the generally accepted threshold of 50 trips per hour for specific intersection analysis. Additionally, it is assumed that all 43 daily trips would be concentrated over a 12-hour period, which would result in an average of only about 3.5 trips per hour that would travel east on Katella Avenue. This assumption is a modest volume of traffic and is unlikely to cause a significant impact, even if all those trips would head in one direction on Valley View Street.

Driveway 1 (on Douglas Drive) and Driveway 2 (on Plaza Drive) would be utilized by heavy trucks to access the project site. Driveway 1 would serve as the primary driveway for heavy trucks accessing the project site. As such, heavy trucks would be expected to concentrate along Douglas Drive and Plaza Drive as opposed to Valley View Street. Therefore, emissions from heavy trucks are not expected to result in emissions that would impact sensitive receptors along Valley View Street.

Valley View Street is located over 1,000 feet to the west of the project site and sensitive receptors located along Valley View Street are not located in the immediate vicinity of the proposed project. Currently, there is no methodology to quantify the cumulative areawide or localized health risks

within a community-wide area. The City relies on the South Coast AQMD's recommended methodology to evaluate cumulative impacts, which is to conclude that an impact considered to be significant on a project-specific basis would also cause a significant cumulative impact. As shown in Table 4.1.8 of the Draft EIR, the proposed project would not result in a substantial amount of mobile source emissions or TRU truck emissions and total project operational emissions would be well below the South Coast AQMD thresholds. Therefore, the proposed project would not result in significant mobile source emissions that would impact sensitive receptors. Therefore, the proposed project would not expose sensitive receptors to substantial levels of TACs and would not be expected to generate a substantial amount of emissions from heavy trucks that would impact sensitive receptors along Valley View Street.

Response to Comment IP-1-37

The commenter refers to Threshold E under Biological Resources of the IS attached as Appendix B to the Draft EIR. This comment claims that the potential impacts to protected trees is not supported by substantial evidence and not analyzed. The commenter recommends that the Draft EIR be revised to provide better context and reflect the results of this analysis.

The City acknowledges this comment. No protected trees or landmark trees are located on or adjacent to the project site or within the Public Right of way. The Landmark Tree Ordinance in the City's Municipal Code protects designated landmark trees that are specifically identified in the City's Inventory of Landmark Trees (July 1996).[13] As shown in this inventory, there are no landmark trees on the project site. Accordingly, the removal of any on-site trees or vegetation would not conflict with the City's Landmark Tree Ordinance. As such, the proposed project would comply with all local policies and ordinances associated with tree protection.

Response to Comment IP-1-38

The commenter claims that the GHG emissions analysis on pages 4.5-20 through 4.5-21 of the Draft EIR does not include discussion of pertinent goals of the 2020-2045 RTP/SCS. The commenter recommends that the Draft EIR be revised to analyze the consistency of the project with relevant goals and policies of the 2020-2024 RTP/SCS related to reduction of GHG emissions and recirculated to provide the public an opportunity to review and comment on the City's justification for the conclusion of less than significant impact with respect to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

The City acknowledges this comment. A description of the Southern California Association of Governments (SCAG) 2020–2045 goals and GHG reduction targets is included on pages 4.5-9 through 4.5-10 of the Draft EIR. The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) land use strategies to achieve the region's targets include planning for new growth around high-quality transit areas and livable corridors. The 2020–2045 RTP/SCS takes into account information/ assumptions provided by member cities and counties throughout the SCAG region, including the City of Cypress, Los Alamitos, and many others in the surrounding area through the SCAG cooperative process. The proposed project would include the demolition of existing uses to provide infill development within an existing urban area that is currently served by

[13] City of Cypress. 1996. Inventory of Landmark Trees. July.

transit facilities along Katella Avenue and Valley View Street. Additionally, the proposed project would be designed to comply with the water efficiency and energy conservation requirements included in the California Building Standards Code and will achieve certification for Leadership in Energy and Environmental Design (LEED). Therefore, the proposed project would be consistent with land use strategies outlined in the 2020–2045 RTP/SCS and would be designed to include sustainable project features that would conserve the use of water and energy. Furthermore, as described on pages 4.1-21 through 4.1-22, the proposed project would be consistent with the forecasted regional growth patterns for the City and would not result in a substantial increase in employment projections. As such, the proposed project would be consistent with SCAG's growth assumptions for new job growth in the region as identified in the 2020–2045 RTP/SCS. Additionally, based on the proposed project size (191,394 square feet), the proposed project is not considered a project of statewide, regional, or areawide significance (e.g., large-scale projects such as airports, electrical generating facilities, petroleum and gas refineries, residential developments of more than 500 dwelling units, and shopping centers or business establishments employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space) as defined in the California Code of Regulations (CCR) (Title 14, Division 6, Chapter 3, Article 13, Section 15206(b)). Because the proposed project would not be defined as a regionally significant project under CEQA, it does not meet the SCAG's Intergovernmental Review criteria. Furthermore, as described on page 4.5-21, the forecasted development pattern of the SCAG region would reach the regional target of reducing GHG emissions from autos and light-duty trucks by 19 percent by 2035 (compared to 2005 levels). Therefore, since the proposed project is already reflected in SCAG's 2020–2045 RTP/SCS, it would not interfere with SCAG's ability to achieve the region's GHG reduction target of 19 percent below 2005 per capita emissions levels by 2035. Furthermore, the proposed project would not conflict with the SCAG RTP/SCS targets since those targets were established and are applicable on a regional level. Additionally, as outlined in Appendix B of the Initial Study, Table 4.11.A, RTP/SCS Consistency Analysis, provides a consistency analysis of the goals from the 2020–2045 RTP/SCS that are relevant to the proposed project. As stated in this table, the proposed project would be consistent with applicable goals in the SCAG's 2020–2045 RTP/SCS. Table 4.11.B, General Plan Consistency Analysis, provides a consistency analysis of the goals and policies from the City's General Plan that are relevant to the proposed project. As stated in Table 4.11.B, the proposed project would be consistent with all applicable General Plan goals and policies.

Response to Comment IP-1-39

The commenter claims that the Draft EIR incorrectly states that the proposed project is not regionally significant per State CEQA Guidelines Section 15206 which states that a regionally significant project includes a project that has the potential for causing significant effects on the environment extending beyond the city or county in which the project is located. The commenter refers to the scoping process in the Draft EIR where the City of Los Alamitos voices concern regarding the potential impacts of the Project on Los Alamitos.

The City acknowledges this comment. Based on the proposed project size (191,394 square feet), the proposed project is not considered a project of statewide, regional, or areawide significance per State CEQA Guidelines Section 15206. Furthermore, the City relies on the South Coast AQMD's recommended methodology to evaluate cumulative impacts, which is to conclude that an impact considered to be significant on a project-specific basis would also cause a significant cumulative

impact. As described on pages 4.5-15 through 4.5-17, the 3,000 metric tons of carbon dioxide equivalent per year (MT CO_2e/yr) threshold was developed and recommended by South Coast AQMD, an expert agency, based on substantial evidence as provided in the Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold[14] document and subsequent Working Group meetings. South Coast AQMD has not withdrawn its support of the interim threshold and all documentation supporting the interim threshold remains on the South Coast AQMD website on a page that provides guidance to CEQA practitioners for air quality analysis (and where all South Coast AQMD significance thresholds for regional and local criteria pollutants and toxic air contaminants also are listed). If a project exceeds the identified South Coast AQMD significance threshold, its emissions would be cumulatively considerable, resulting in significant adverse GHG impacts to the region's existing conditions. As shown in Table 4.5.3, operational GHG emissions would be below the numeric South Coast AQMD threshold of 3,000 MT CO_2e. Therefore, operation of the proposed project would not generate significant GHG emissions that would have a significant effect on the environment extending beyond the city or county in which the project is located. As such, the proposed project would not result in a cumulative GHG impacts and additional analysis to assess cumulative impacts is not required.

Response to Comment IP-1-40

The commenter claims that the analysis of potential impacts of construction noise on sensitive receptors in Draft EIR is contradicted by the sensitive receptors named in the adjacent Goodman Commerce Center IS/MND. The commenter claims that due to the proximity of the proposed project to the Goodman Commerce Center project, the sensitive receptors of the Goodman Commerce Center project would also be the closest sensitive receptors to the proposed project. The commenter recommends that the Draft EIR be revised to reflect potential impacts to nearest sensitive receptors.

The City acknowledges this comment. The Goodman Commerce Center's closest sensitive receptors were hotels located to the north and south. The Goodman Commerce Center IS/MND states that the "closest sensitive use for the noise analysis is the Extended Stay America Hotel located approximately 70 feet north of the project site" (Goodman Commerce Center IS/MND page 4.13-15.). Those receptors are more than 1,400 feet from the center of the 5665 Project.

Response to Comment IP-1-41

This comment refers to the potential impacts of construction noise that the combination of the equipment during the site preparation and grading phases would have to the nearest noise-sensitive hotel use located 1,300 feet away. The commenter claims that the closest point from the edge of the project site to the nearest sensitive receptor is 1,015 feet. The commenter claims that the noise levels thresholds are incorrectly applied and excludes specific construction activities. The commenter further claims that the Draft EIR fails to provide a mitigation measure that includes the installation of a temporary noise barrier. The commenter recommends that the Draft EIR be revised to correctly reflect construction noise impacts and be recirculated in accordance with CEQA Guidelines Section 15088(a)(1).

[14] South Coast AQMD. 2008. *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*. October. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2 (accessed May 13, 2024).

The City acknowledges this comment. The construction noise analysis in the Draft EIR appropriately uses the center of the construction area to assess the typical or average condition during construction. Although it is highly unlikely that all of the typical construction equipment working on the site would be operating at exactly the same time, it is even less likely that they would be doing so at the edge of the construction site. Furthermore, there is no requirement under CEQA to assess the worst-case scenario or day. The average noise level (L_{eq}) is used to assess the increase of ambient noise based on typical hourly noise levels consistent with the average construction condition.

Secondarily, the City's Municipal Code specifies (as stated on page 4.6-5 of the Draft EIR) that construction noise is exempt from the operational noise standards in Table 4.6.2.

Response to Comment IP-1-42

This comment refers to the Noise analysis in the Draft EIR. The commenter claims that the Draft EIR Table 4.6.5 and Figure 4.6-1 only show three locations for long-term measurement of noise when the Noise analysis discusses measurements at four locations in the vicinity of the project site. The commenter further claims that the existing conditions at the nearest sensitive receptor, Courtyard by Marriott and residential uses to the north, are not accurately presented in the Draft EIR. The commenter also claims that the noise analysis does not accurately reflect the change in ambient noise levels at the most affected sensitive receptors that would result from the construction of the project. The commenter recommends that the Draft EIR be revised to reflect impacts at nearest sensitive receptors.

The City acknowledges this comment. Please refer to Section 3.0, Errata, for a description of the revision to the Draft EIR.

Additionally, the City disagrees with the statement that the monitoring locations in the Draft EIR present higher ambient noise level conditions. Based on field observation and a review of the data, the noise environment at the measurement locations is much more influenced by traffic noise than operations at surrounding uses. Furthermore, the noise monitoring locations represent the locations at which project construction and operation would be the loudest due to distance and lack of shielding from intervening buildings.

Response to Comment IP-1-43

The commenter claims that the Draft EIR fails to identify the haul truck route that trucks will utilize to export approximately 960 cubic yards of soil. The commenter claims that the change in ambient noise environment resulting from haul truck activity is not correctly assessed in the Draft EIR and will likely pass by numerous residential neighborhoods and schools. The commenter recommends that the Draft EIR be revised to reflect potential impacts of hauling activity to nearest sensitive receptors.

The City acknowledges this comment. The expected volume of haul truck trips during the demolition phase would be 30 heavy truck trips based on the modeling completed in CalEEMod for the Air Quality Analysis. The City's truck haul routes are along major arterials including Katella Avenue and Valley View Street. The minimum volume along the streets near the project site is 31,200 based on the City's Circulation Element. With an increase of 30 heavy trucks, the estimated noise increase

would be less than 0.02 dBA CNEL. Therefore, there would be no perceptible increase to uses along the haul routes during construction.

Response to Comment IP-1-44

The commenter raises concerns regarding the DDC technique outlined in Appendix F of the Draft EIR, which is intended to mitigate soil liquefaction and support the proposed project. The commenter notes that, although DDC is mentioned in the Executive Summary as part of Alternative 4, it is not included in the main project descriptions or characteristics. The first reference to DDC appears late in the document, on page 4.6-16. Additionally, the commenter points out that the Draft EIR contains a brief analysis of the potential damage DDC could cause to adjacent buildings, along with a proposed mitigation measure (MM NOI-1, Construction Vibration Monitoring Plan) to address these concerns. The commenter concludes that, with this mitigation, the impacts would be less than significant.

The City acknowledges this comment. Deep dynamic compaction (DDC) is addressed in Section 4.6, Noise, of the Draft EIR. As DDC is a soil compaction technique and not related specially to construction equipment or construction duration, DDC activities were not specifically described in the project description.

Response to Comment IP-1-45

The commenter claims that the employment of DDC in the project and Alternative 4 are not specified in the Draft EIR, and that it is unclear how Alternative 4 would reduce impacts compared to the project. The commenter recommends that considerable additional details regarding the parameters and locations where DDC is to take place in both the project and alternative needs to be provided.

As described on page 5-21, under Chapter 5.0, Alternatives, of the Draft EIR, Alternative 4 would only utilize deep dynamic compaction within the central portion of the project site, while stone columns would be installed around the periphery of the project site. Under this alternative, it is assumed the deep dynamic compaction activities would not be implemented within 80 feet of the nearest buildings to reduce potential building damage and vibration impacts. While this alternative may generate short-term noise and vibration impacts from associated equipment, compliance with Regulatory Compliance Measure NOI-1 would reduce construction noise and vibration, and impacts would be less than significant.

As discussed on page 4.6-20 in Section 4.6, Noise, of the Draft EIR, the proposed project would involve DDC construction activities, which could include drops as close as 50 feet from the nearest structures. As the nearest off-site industrial building to the DDC construction activities would experience vibration levels of up to 1.02 inches per second peak particle velocity (in/sec PPV), which would potentially exceed the Federal Transit Administration (FTA) threshold of 0.5 in/sec PPV for building damage. At a distance of approximately 78 feet from DDC construction activities, vibration levels at the nearest off-site industrial building would be 0.49 in/sec PPV and would be below the FTA criteria of 0.5 in/sec PPV. While construction could result in vibration damage, impacts would be reduced to less than significant, and the potential for building damage would be eliminated with the incorporation of Regulatory Compliance Measure NOI-1.

As such, Alternative 4 would reduce impacts to DDC as this alternative would not lead to potentially significant vibration impacts.

Response to Comment IP-1-46

The commenter claims that there is no analysis of the potential impacts on human annoyance from DDC presented in the Draft EIR. The commenter recommends that the Draft EIR be revised to include an analysis of vibration impacts on DDC on human annoyance.

CEQA does not require a discussion of potential impacts on human annoyance for vibration. As discussed in Section 4.6 of the Draft EIR, analysis of vibration impacts focused on construction of the proposed project and disclosed that construction activity could result in the generation of ground-borne vibration. However, the vibration analysis was focused on potential impacts to nearby buildings, not sensitive land uses. The noise analysis identified the closest sensitive land use as the Courtyard by Marriott Hotel, located approximately 970 feet southeast of the project site boundary (see page 4.6-18 of the Draft EIR). Construction activities would occur at a distance of 1,300 feet from the nearest sensitive use, representing the total distance from the center of construction activity at the project site to the nearest-sensitive use (Courtyard by Marriott). This represents a sufficient enough distance to reduce ground borne vibration to levels unlikely to result in annoyance at the nearest sensitive receptor.

Response to Comment IP-1-47

The commenter claims that statements regarding the noise impacts of DDC is contradicted with other information in the Draft EIR. The commenter refers to Table 4.6.6 of the Draft EIR on page 4.6-15 and statements on Page 4.6-16 where source levels for construction equipment is discussed. The commenter recommends that the Draft EIR be revised to reflect the correct equipment mix to be used during site preparation and that the resulting noise levels are sensitive receptors be re-calculated.

The comment is incorrect in stating that DDC noise levels are higher than standard pile driving. Reference noise levels associated with DDC indicate that the noise level generated is actually 80 dBA at 50 feet, which is quieter than the assumed crane noise level of 85 dBA at 50 feet. The 101 dBA referenced by the commenter is for impact pile driving, which is substantially louder.

Response to Comment IP-1-48

This comment provides concluding remarks from EcoTierra Consulting Inc.

The City acknowledges this comment and thanks the commenter for their input.

Response to Comment IP-1-49

This comment includes introductory remarks from the Ganddini Group who would provide a peer review summary of the transportation section of the Draft EIR and supporting documents.

The City acknowledges this comment. Because the comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR, no further response is required.

Response to Comment IP-1-50

This comment includes a general summary of the claims mentioned previously, including that the proposed project and the adjacent Goodman Commerce Center project were "piecemealed" to avoid analysis of a single larger project. The commenter claims that when considered as one large project, the trip generation, net change in volume-to-capacity, delay, and Level of Service operations would have greater impacts than in the evaluation as two separate projects.

The City acknowledges this comment. Please refer to Response to Comment IP-1-2.

Response to Comment IP-1-51

The commenter claims that Section 4.7.3.1 of the Draft EIR incorrectly describes the proposed sidewalks along 5775 and 5885 Plaza Drive. The commenter states that the proposed sidewalks will presumably be installed along 5775 and 5885 Plaza Drive on the north side of Plaza Drive. Additionally, the commenter noted that Walker Street is incorrectly described as undivided. The commenter recommends that the description of existing conditions be revised.

The City acknowledges this comment. Please refer to Section 3.0, Errata, for a description of the revisions made to the Draft EIR.

Response to Comment IP-1-52

This comment refers to the peak volume counts and the adjustments made based on the low occupancy office uses in the Traffic Analysis. The commenter claims that the traffic volumes on Exhibit 3-8 of the Traffic Analysis do not accurately reflect the adjustments. The commenter further claims that the Level of Service calculations presented in the Draft EIR are not accurately represented according to the study's own methodology, and that the analysis relies on assumptions to estimate existing conditions that are inconsistent with City guidelines and industry practice. The commenter recommends that the Draft EIR/Traffic Analysis be revised based on new traffic counts withing the past year to re-establish the existing conditions baseline.

The City determined that new traffic counts were not required, as noted in Appendix 1.1, Approved Traffic Study Scoping Agreement, of the Traffic Analysis. The traffic counts used are from August 30, 2022. The traffic scoping agreement, approved August 17, 2023, is less than a year after these counts were taken and aligns with the City of Cypress Transportation Operational Assessment Guidelines. As part of the scoping agreement, City staff approved use of adjusted 2022 traffic count data as specified in the methodology outlined in Section 3.6 of the Traffic Analysis. The commenter states that the adjusted 2023 traffic volume should be greater than what was ultimately calculated based on the assumption that the 30 percent adjustment was applied to all turning movements. However, the 30 percent adjustment factor was not intended to apply to all or total traffic on the road, as was stated by the commentor. The 30 percent adjustment factor was intended to only apply to the pandemic period depressed traffic generation from under occupied buildings at the

time the traffic counts were taken. Adjustments were only made to specific turning movements into and out of low occupancy office driveways. See Section 4.7.3.2, Existing Traffic Volumes and LOS Analysis, of the Draft EIR and Section 3.6, Existing (2023) Traffic Counts, for further discussion on the 2023 traffic counts used for the traffic analysis. The commenter does not present any evidence that the assumptions do not accurately reflect expected conditions, or that the EIR does not adequately discuss a potential impact.

Response to Comment IP-1-53

This comment refers to the existing baseline VMT which was established for year 2020. The commenter claims that the environmental baseline should correspond to conditions at the time that environmental analysis is prepared which is typically based on the date of the Notice of Preparation which is 2024.

The City acknowledges this comment. Please refer to Response to Comment IP-1-22.

Response to Comment IP-1-54

The commenter claims that the VMT per employee is incorrectly calculated as 24.81 and states it should be 24.08 VMT per employee. The commenter further claims that the baseline VMT per employee is inconsistent with the VMT analysis in Appendix E.

This is a typographical error. The Draft EIR has been revised to provide the correct VMT per employee (24.1). Please refer to Section 3.0, Errata, for a description of the revision to the Draft EIR.

Response to Comment IP-1-55

The commenter claims that the description of lane capacity assumptions is inconsistent with the Traffic Analysis in Appendix E. The commenter further claims that HCM calculations should be performed using latest versions of the HCM and Synchro software suite. The commenter recommends that the Draft EIR be revised based on the latest HCM methodology and Synchro software requirements, which would affect the existing and future Levels of Service.

Comment noted. As discussed in Appendix 1.1, Approved Traffic Study Scoping Agreement, to the Traffic Analysis, the City approved use of Synchro 11 and the HCM 6th Edition for purposes of the traffic analysis. A City has the discretion to choose among many different methodologies, software, and study parameters for the conduct of traffic studies. Not all agencies direct that the latest HCM methodologies and Synchro software versions be used in the conduct of their traffic studies. With that being said, the HCM 7th Edition was released in January of 2022; however, Synchro 12 wasn't released until May of 2023. Since Synchro 11 is based on the 6th Edition of the HCM and was the latest software available in July of 2022 when the consultant first filed their traffic study request with the City, it is entirely appropriate for the consultant to use the 6th Edition of the HCM and Synchro 11 to perform the traffic analysis.

Section 4.7.4.1, Intersection Level of Service Methodologies, of the Draft EIR, states that Synchro 10 was used for the traffic analysis. The Draft EIR will be corrected to reflect the correct version of Synchro. Please see Section 3.0, Errata. The commenter should note that the HCM 6th Edition

methodology only affects unsignalized intersections as the signalized locations utilize the Intersection Capacity Utilization (ICU) methodology per the City's Traffic Study Guidelines.

Response to Comment IP-1-56

This comment refers to pages 4.7-11/12 Section 4.7.6 which states that trip generation estimates were derived from trip generation rates obtained from the ITE Trip Generation Manual (11th edition) for a High-Cube Cold Storage Warehouse. The commenter claims that because the ultimate tenant has not been identified, there are numerous other types of warehouse categories that would generate more peak hour and total daily trips that should be presented. The commenter includes a table with other warehousing categories that show trip generation data, and claims that the Draft EIR underestimates the proposed project's potential trip generation and relate impacts. The commenter includes trip estimates of a High-Cube Fulfillment Center Warehouse (Sort) or a High-Cube Parcel Hub Warehouse that would generate more net new peak hour trips and require further analysis. The commenter suggests that because ultimate tenants are not known, the Draft EIR should be revised to consider trip generation for the worst-case potential tenant.

The City Acknowledges this comment. The Institute of Transportation Engineers' (ITE) *Trip Generation Manual* defines a high-cube warehouse (HCW) as "a building that typically has at least 200,000 gross square feet of floor area, has a ceiling height of 24 feet or more, and is used primarily for the storage and/or consolidation of manufactured goods (and to a lesser extent, raw materials) prior to their distribution to retail locations or other warehouses." The building developed under the proposed project would be less than 200,000 gross square feet. As discussed in Appendix 1.1, Approved Traffic Study Scoping Agreement, to the Traffic Analysis, the High Cube Cold Storage Warehouse (ITE Land Use Code 157) land use was conservatively assumed for use in the traffic analysis. Additionally, CEQA does not require an analysis of a worst-case scenario, but rather requires a sufficient degree of analysis to provide decisionmakers with information that enables them to make a decision which intelligently takes account of the environmental consequences of a project.

Response to Comment IP-1-57

This comment refers to page 4.7-13 which discusses land use-to-employee conversion factors developed from the ITE Trip Generation Manual for purposes of converting the project land use into socioeconomic data for the VMT modeling performed. The commenter claims that the VMT Analysis in Appendix E does not specific use of the ITE Trip Generation Manual for development of these conversion factors, making it unclear what ITE land use was used. The commenter claims that the Draft EIR fails to adequately document the methodology used and that these assumptions cannot be verified.

The City acknowledges this comment. Page 4.7-13, Section 4.7, Transportation, discusses the and use-to-employee conversion factors, which have been updated to reflect the project land use to employment conversion factor. Additionally, please refer to Response to Comment IP-1-26.

Response to Comment IP-1-58

The commenter states that page 4.7-13, Table 4.7.6 of the Draft EIR identifies the baseline VMT for Orange County as 24.1 VMT per employee noting that this is inconsistent with the Table 4.7.2 in the Existing Environmental Setting section, which identifies the baseline as 24.81 VMT per employee.

This is a typographical error. The Draft EIR has been revised to provide the correct VMT per employee (24.1). Please refer to Section 3.0, Errata, for a description of the revision to the Draft EIR.

Response to Comment IP-1-59

The commenter refers to the Intersection Capacity Analysis on page 17, Section 2.2 which states that the intersection LOS was performed based on the 6th edition HCM methodology. The commenter recommends that the analysis use the more recent 7th edition HCM methodology and Synchro software version 12 in accordance with the City Traffic Study Guidelines.

Please see Response to Comment I-1-55.

Response to Comment IP-1-60

This comment refers to page 36 Section 4.1.2 which states that the project trip generation was estimated based on rates for a High-Cube Cold Storage Warehouse. The commenter states that trip generation rates for a High-Cube Fulfillment Center Warehouse (Sort) would generate roughly three to four times the number of peak hours PCE trips analyzed in the February 2024 Traffic Analysis.

Please see Response to Comment I-1-56.

Response to Comment IP-1-61

The commenter claims that project trip distribution patterns on pages 39-40 Exhibits 4-1 and 4-2 are inconsistent with trip distribution forecasts for the adjacent Goodman Commerce Center Traffic Analysis. The commenter includes a table summarizing the inconsistencies and recommends that the Draft EIR be revised to be consistent with the Goodman Commerce Center or provide an explanation of why the trip distribution assumptions in the Goodman Commerce Center are incorrect.

Project trip distribution is based on a project's location relative to the surrounding street system, including proximity to roadways and expected number/types of trips, and determined from existing traffic counts. Because of those factors, two separate projects are likely to have different trip distribution patterns. Project trip distribution was reviewed and approved by City Public Works staff as part of the scoping process. The Goodman Commerce Center and 5665 Plaza Drive projects are not constructed as the same type of warehouse nor is the primary access to the loading docks and the employee parking areas for the two projects the same. Therefore, it is reasonable to assume that the trip distribution would likewise vary between the two projects and not be identical. A significant factor in the distribution of truck and car traffic to and from the west along Katella Avenue is the fact that the 5665 Plaza Drive warehouse is constructed to accommodate cold storage. The Ports of Los Angeles and Long Beach terminals are the busiest gateway for the import and export of refrigerated cargo on the West Coast. With the 5665 Plaza Drive warehouse being in much closer proximity to the two ports than larger cold storage facilities located in the Inland

Empire, it is reasonable to assume that much of the traffic destined to, or originating from, the 5665 Plaza Drive warehouse will be linked to port traffic and its employee base.

Please see Appendix 1.1, Approved Traffic Study Scoping Agreement, to the Traffic Analysis for additional information regarding the assumptions used in the Traffic Analysis.

Response to Comment IP-1-62

The commenter refers to page 45, Table 4-6, of the Traffic Analysis, and claims that the Traffic Analysis fails to document the trip generation source used to determine cumulative development trip generation forecasts. The commenter claims that the cumulative development trip generation may be substantially understated if there is potential for future occupancy of the Goodman Commerce Center with a fulfillment center. The commenter further claims that the Draft EIR underestimates trip generation and total volumes for future conditions. The commenter recommends that the Draft EIR be revised to consider trip generation for the worst-case potential tenant for the adjacent Goodman Commerce Center.

The commenter indicates that, absent conditions of approval to restrict land uses analyzed for the cumulative projects, both the Draft EIR and the Traffic Analysis underestimate trip generation and total volumes for future conditions. As discussed in Appendix 1.1, Approved Traffic Study Scoping Agreement, to the Traffic Analysis, the City approved the cumulative projects, and the land uses used for purposes of trip generation. ITE land use for the adjacent project would have been consistent with the analysis completed for that project's environmental documentation and consistent with direction from the City's traffic engineer as evidenced by the approved scoping agreement used for preparation of the traffic analysis. The commenter speculates that the Goodman Commerce Center Project may be potentially occupied by a fulfillment center. "Logistics center" is not a land use currently permitted in the McDonnell Center Specific Plan. Warland's March 7, 2024, letter acknowledges this fact. CEQA does not require speculation, but instead requires reasonable analysis. Analysis of potential future occupancy of the Goodman Center by an impermissible land use would be unduly speculative and would not constitute a reasonable analysis.

Response to Comment IP-1-63

This comment refers to the Approved Traffic Study Scoping Agreement in Appendix 1.1 to the Traffic Analysis, which states that a safety assessment, including review of collision history in the study area will be prepared. The commenter claims that the collision history review is not included in the Traffic Analysis. The commenter recommends that the Traffic Analysis be revised to include collision history review.

A safety analysis was prepared for the proposed project as a separate document and is being included in the Final EIR. Please see Section 3.0, Errata. The analysis does not change the conclusions in the EIR and provides support for the analysis included in Section 4.7.6 of the Draft EIR.

Response to Comment IP-1-64

The commenter refers to the Project Traffic Analysis Zone Update on page 2 of the VMT analysis, which is included as Appendix E to the Draft EIR. The commenter claims that the VMT analysis should specify the source for conversion factors used to verify assumptions.

The City acknowledges this comment. Please refer to the Response to Comment IP-1-26.

Response to Comment IP-1-65

This comment refers to the Footnote 2 of Table A on page 5 of the VMT Analysis which indicates the baseline project and regional VMT calculations are based on the OCTAM base year 2016. The commenter claims that the calculations should be based on the appropriate existing year by interpolating between the base year and future/cumulative year models.

VMT analysis conducted using model base year typically provides a more conservative estimate for project VMT profile. This is because, with new land use developments, travel requirements for employment, educational and other daily activities tend to diminish. Therefore, as a conservative estimate, model base year (2016 for OCTAM) have been used to determine the regional threshold and project VMT. It should be noted that though the City is yet to develop its own VMT guidelines, this methodology is consistent with majority of the jurisdictions as well as the VMT analysis methodologies of the County of Orange.

Response to Comment IP-1-66

This comment refers to the VMT Calculation Worksheet (Appendix A) where the heading of the table referred to the "Goodman Commerce Center" rather than 5665 Plaza Drive. The commenter states that this has since been corrected in Appendix E of the Draft EIR however the date of the VMT analysis memorandum is the same and there is no indication that the document has been revised. The commenter further claims that the analysis fails to document the original land use and conversion factors used to determine the employment input for the project.

The City acknowledges this comment. Please refer to Responses to Comments IP-1-25 and IP-1-26.

Response to Comment IP-1-67

This comment refers to the Updated Traffic Analysis by Urban Crossroads (January 2024) which contains Exhibit 1-11 showing truck turning templates at the intersection of Douglas Drive and Katella Avenue. The commenter claims that this presents a potential hazard for passenger cars who may get caught in the trucks turning path. The commenter recommends that the Draft EIR be revised to include the latest version of the Traffic Analysis and demonstrate how trucks can complete a right turn without encroaching into the adjacent lane.

As shown on Exhibit 1-11, the inbound truck turns coming in from the east on Katella Avenue would be turning within the proposed restriping of the road. The right turning lane in the westbound approach to Douglas Drive depicted on the aerial photo would be removed and is not included as part of the project.

Response to Comment IP-1-68

This comment provides concluding remarks regarding the comments presented by Ganddini. The commenter claims that the potentially understated trip generation estimates may affect other technical studies such as air quality/greenhouse gas emissions and noise. The commenter further claims that the comments pertaining to the VMT analysis may affect the finding of significance.

The City acknowledges this comment. Please refer to Response to Comment IP-1-56.

Response to Comment IP-1-69

This comment provides concluding remarks and contact information.

The City acknowledges this comment and thanks the commenter for their input.

Response to Comment IP-1-70

This comment provides introductory remarks regarding Warland Investment Company and summarizes the proposed project which they refer to as "5665 Redevelopment".

The City acknowledges this comment. Because the comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR, no further response is required.

Response to Comment IP-1-71

The commenter acknowledges the previously prepared IS/MND and the NOP for the Draft EIR. The commenter notes that the NOP describes the EIR as a standalone warehouse project, and claims that the description is inaccurate and misleading. The commenter further claims that the proposed project is the second phase of a larger project consisting of the redevelopment by Goodman of 5665 and 5757 Plaza Drive. The commenter recommends that the EIR fully analyze the cumulative environmental impacts of the 3-building redevelopment of 5665 and 5757 Plaza Drive and account for the foreseeable use of the project for logistics purposes.

The City acknowledges this comment. Please refer to Response to Comment IP-1-2.

Response to Comment IP-1-72

This comment refers to the cumulative impacts of the proposed project and the Goodman Commerce Center Project. The commenter claims that these are not two separate projects, but two phases of a single larger project due to both parcels being purchased by Goodman in the same transaction. The commenter refers to past site plans and descriptions that were on the City's website to serve as their evidence that 5665 and 5757 Plaza Drive would operate as a single project. The commenter further claims that Goodman intended to redevelop these projects as a single project from the beginning but applied for the City's approval in two phases. The commenter states that the City must perform a proper EIR that defines the project as both 5665 and 5757 Plaza Drive to thoroughly evaluate the cumulative environmental impacts.

The City acknowledges this comment. Please refer to Response to Comment IP-1-2.

Response to Comment IP-1-73

The commenter claims that even if the 5665 Redevelopment was a standalone project, 5665 and 5757 Plaza Drive may operate as a single project now or later because one party owns both parcels. The commenter further claims that given the potential of 5665 and 5757 Plaza Drive to be operated as a single project, the EIR must fully evaluate the cumulative environmental impacts of 5665 and 5757 Plaza Drive including the impacts that would result from being operated as a single project.

Please refer to Response to Comment IP-1-2. Additionally, an EIR was prepared for the proposed project that evaluates the potential cumulative effects of the proposed project and the adjacent Goodman Commerce Center Project. The fact that a single owner owns two adjacent properties does not demand that the properties be analyzed as a single development. The two projects are designed to function independently and have independent utility – one does not necessitate or require the other to function/operate. The commenter speculates about future comprehensive operation. First, logistics uses are not permitted in the specific plan area. Second, the fact that shared drive aisles may exist is reflect of efficient design but does not mandate operation as a single unit. As such, the Draft EIR describes that the proposed project would not lead to any significant or cumulatively significant impacts which could not be mitigated to a less-than-significant level.

Response to Comment IP-1-74

The commenter states that the EIR must consider the foreseeable use of all three buildings for logistics purposes because Goodman is a well-known developer of logistics centers and has developed many in California with similar designs to the 5665 Redevelopment. The commenter questions the office space of the project that is anticipated to be used as "corporate headquarters." The commenter also claims that because the City is actively "modernizing" the City Specific Plans, a logistics or distribution use may be permitted under the modernized Specific Plan. Lastly, the commenter acknowledges that logistics uses are not permitted under the current zoning regulations applicable to the project, but that the City must not limit the scope of the EIR to currently permitted uses. The commenter recommends that the EIR must evaluate the reasonably foreseeable use of the project for logistics purposes.

The City of Cypress does not allow logistic centers as a land use and prohibits logistic centers within the Amended McDonnell Center Specific Plan, which the commenter acknowledged in an earlier letter (Warland letter dated March 7, 2024). The project would not amend the City of Cypress's Zoning Ordinance to allow logistics center. CEQA does not require speculation regarding future actions beyond or not associated with the project. To the extent logistics uses could be permitted in the future, which is highly speculative, such future authorization would be subject to CEQA review in conjunction with required legislative actions (such as an amendment to the Specific Plan). Additionally, an EIR was prepared for the proposed project. Please refer to Response to Comment IP-1-2 for additional details.

Response to Comment IP-1-75

The commenter claims that the City has not considered the full scope of the project by piecemealing the phases of the project. The commenter recommends that the City properly define the proposed project and the foreseeable use. The comment includes concluding remarks.

The City acknowledges this comment. Please refer to Response to Comments IP-1-2 and comment IP-1-74.

Response to Comment IP-1-76

The commenter refers to the proposed project as "5665 Redevelopment", part of the "Goodman Commerce Center" redevelopment project. The commenter summarizes the project timeline from when Goodman acquired the Plaza Drive parcels to when the City tasked LSA to prepare an Initial Study. The commenter claims that the City failed to prepare a thorough Initial Study and review the whole record in connection with the Goodman Commerce Center.

The City acknowledges this comment. Please refer to Response to Comment IP-1-2.

Response to Comment IP-1-77

The commenter claims that the City failed to fairly conduct an Initial Study and instead predetermined that it was going to approve the 5665 Redevelopment with an MND. The commenter also claims that the City knew or should have known that Goodman intended to redevelop 5665 and 5757 Plaza Drive as a cohesive project, yet still approved the preparation of an Initial Study for the proposed project as a standalone project. The commenter states that the City erred in in preparing the Initial Study and MND simultaneously for the proposed project.

The City acknowledges this comment. The City has decided to transition to a Draft EIR to further analyze potential impacts of the proposed project. An EIR was prepared for the proposed project and was prepared in accordance with CEQA and State CEQA Guidelines, ensuring a thorough evaluation of the project's potential environmental impacts. Additionally, while agencies may anticipate the type of CEQA document required, such anticipation does not equate to predetermined outcomes. Rather, agencies always determine the type of CEQA document based on a comprehensive analysis of the project.

Response to Comment IP-1-78

The commenter claims that the City should have included: "the 5757 Redevelopment, the 5665 Redevelopment, and the potential use of Goodman Commerce Center as a logistics center" as the "project". The commenter states that "piecemealing" a project is dangerous because separate pieces may separately have less-than-significant impacts, but the overall project could present significant impacts. The commenter claims that the City "piecemealed" the project and that in viewing the Goodman Commerce Center in separate parts, the City did not evaluate the full cumulative impact which would have resulted in the further requirement to prepare an EIR.

The City acknowledges this comment. Please refer to Response to Comment IP-1-2.

Response to Comment IP-1-79

This comment refers to the design of Goodman logistic centers throughout California to compare to the design of the Goodman Commerce Center at 5757 Drive and design of the proposed project. The commenter states that the Goodman Commerce Center's potential use as a logistics center is not currently permitted under the McDonnell Specific Plan but per the Specific Plan Modernization

project, the Goodman Commerce Center is subject to a new Specific Plan. The commenter claims that the City cannot rely on current permitted uses and that CEQA requires that reasonably foreseeable uses be taken into account for environmental studies. Lastly, the commenter claims that the MND prepared for The Goodman Commerce Center Project was inadequate, and that the City should require an EIR for proposed project that evaluates the entire Goodman Commerce Center.

The City acknowledges this comment. Please refer to Response to Comment IP-1-74.

Response to Comment IP-1-80

This comment refers to the IS/MND which indicates that the proposed project would require an amendment to the McDonnell Specific Plan to allow industrial uses within the eastern portion of the Planning Area 1 and an increase in the maximum allowable square footage of Planning Area 1. The commenter claims that the IS/MND fails to include a description of the type and nature of the light industrial uses and any analysis of impacts resulting from such uses. The commenter states that there is a discrepancy between the Project Description section of the IS/MND and the Land Use and Planning section of the IS/MND in describing where light industrial uses are permitted within Planning Area 1. The commenter claims that the IS/MND fails to include information and analysis concerning the amount of additional square footage proposed to be added to Planning Area 1.

The City acknowledges this comment. The City has decided to transition to a Draft EIR to further analyze potential impacts of the proposed project. Please refer to page 1-1, Section 2.2, Summary of the Project Description, and page 3-15, in the project description of the Draft EIR. The proposed project would include a Specific Plan Amendment to the McDonnell Center Specific Plan to allow light industrial uses in the eastern portion of Planning Area 1, and removal of the maximum developable area requirement while retaining the 1.0:1 floor area ratio (FAR) to maintain consistency with the General Plan. Additionally, the portion of Planning Area 1 which is outside of the proposed project already permits industrial/warehouse uses. (McDonell Center Specific Plan at 10-12, 40-43.) Therefore, the proposed project would not create a new permitted use in the western portion of Planning Area 1.

Response to Comment IP-1-81

The commenter claims that results of the MND, which is treated as a standalone project, are contradictory, inaccurate, and not reliable for purposes of evaluating the actual impact of the project.

The City acknowledges this comment. Because the comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR, no further response is required.

Response to Comment IP-1-82

This comment refers to the Goodman Commerce Center Traffic Analysis dated January 11, 2024, prepared by Urban Crossroads. The commenter claims that the Truck Distribution map is missing critical information and obscures the total amount of truck traffic that the residences on Valley View

will be subjected to because of the 5665 Redevelopment by assuming that truck traffic would exit via specific driveways.

The City acknowledges this comment. The City has decided to transition to a Draft EIR to further analyze potential impacts of the proposed project. According to the Traffic Impact Analysis (TIA) in Appendix E of the Draft EIR, the truck distribution map reflected on Exhibit 4-1 in the TIA is specific to the development of the proposed project and does not reflect the distribution patterns of the adjacent Goodman Commerce Center Project, located at 5757 Plaza Drive, since the Goodman Commerce Center Project is not a part of the proposed project. The commenter is referred to Responses to Comments IP-1-36 and IP-1-61.

Response to Comment IP-1-83

The commenter claims that the Traffic Analysis significantly underestimates the number of truck trips because the analysis evaluates the daily truck trips generated by the proposed project as a standalone project rather than a part of the entire Goodman Commerce Center and because it fails to contemplate the reasonably foreseeable use of the facility as a logistics center.

The City acknowledges this comment. According to the TIA in Appendix F of the Initial Study, the truck distribution map on Exhibit 4-1 is specific to the proposed project and does not reflect the distribution patterns of the adjacent Goodman Commerce Center development (located at 5757 Plaza Drive) since it is not a part of this project. However, the truck trip distribution patterns for the adjacent Goodman Commerce Center are accounted for as cumulative projects, and those trucks are included in the Future Year (2025) analysis, as presented in the traffic study. Additionally, please refer to Response to Comments IP-1-2 and IP-1-74 for more details.

Response to Comment IP-1-84

The commenter claims that the MND does not adequately address the environmental impacts of high cube refrigerated storage, particularly concerning the use of refrigerated trucks. The commenter also notes that these trucks are heavily polluting due to their weight and operational constraints, leading to significant air quality issues. Specifically, a truck running 8,000 hours per week poses a cancer risk to nearly 1,800 people per million living near cold-storage facilities. The commenter claims that the MND's failure to consider these impacts results in incomplete and inaccurate conclusions regarding air quality, undermining its reliability.

The commenter claims that there is health risks associated with living near cold-storage warehouses that the MND does not consider in its conclusions related to air quality. The commenter claims that the conclusions of the MND are incomplete and cannot be relied upon.

The City acknowledges this comment. The City has decided to transition to a Draft EIR to further analyze the potential impacts of the proposed project. As stated on page 4.1-26, in Section 4.1 Air quality, “long-term operation emissions associated with the proposed project were calculated using CalEEMod. The proposed project analysis was conducted using land use codes Refrigerated Warehouse No-Rail, and Parking Lot. Trip generation rates used in CalEEMod for the proposed. project was based on the project’s trip generation estimates identified in the proposed projects. Traffic Analysis (provided in Appendix E of the Draft EIR). The proposed project would generate a

total of 406 average daily trips (ADT), including 262 passenger vehicle trips, 50 two-axle truck trips, 16 three-axle truck trips, and 78 four-axle truck trips, which was included in CalEEMod. This analysis assumes that the four+-axle truck trips would travel approximately 40 miles. To be conservative, separate CalEEMod analyses were prepared for the operational analysis for the proposed project. One CalEEMod run evaluated operational and vehicle trip emissions and another CalEEMod run. evaluated four+-axle truck trip emissions. In addition, it was conservatively assumed that trucks of all sizes would have diesel-powered transportation refrigerated units (TRUs). As a conservative assumption, the TRUs were modeled to be operational for up to 15 minutes per day. To be sure, 15 minutes is a conservative estimation of operational time for TRUs, as it represents a three-times. exceedance of CARB's anti-idling rules, which prohibit idling for more than 5 minutes.[15] Moreover, truck operators will have access to plug-in power to operate the TRUs and will be incentivized to do. so based on their own fuel costs and compliance with the CARB TRU ATCM. However, to be conservative, the 15-minute runtime assumption does not take into account plugging into electric power sources. As such, because future TRU trucks would be required to plug in, any increase in emissions associated with TRUs would be minimal and would not result in a significant increase in emissions.

Response to Comment IP-1-85

The commenter claims that the MND fails to evaluate off-site impacts that are reasonably foreseeable. The commenter further claims that given the location of the Goodman Commerce Center being near populated areas and the foreseeable use of the project as a logistics center, off-site impacts of the project are reasonably foreseeable. The commenter states that the MND should have analyzed the air quality impact of the off-site vehicle trips but because they failed to do so, the conclusions of the MND are incomplete and cannot be relied upon.

The City acknowledges this comment. The City has decided to transition to a Draft EIR to further analyze potential impacts of the proposed project. As discussed on page 4.1-19 of the Draft EIR, the South Coast AQMD published its Final Localized Significance Threshold Methodology in July 2008, recommending that all air quality analyses include an assessment of air quality impacts to nearby sensitive receptors. This guidance was used to analyze potential localized air quality impacts associated with construction of the proposed project. Localized significance thresholds (LSTs) are developed based on the size or total area of the emission source, the ambient air quality in the source receptor area, and the distance between the project and the nearest sensitive receptor. As stated on page 4.1-28 of the Draft EIR, by design, the localized impacts analysis only includes on-site sources.

Further, the operational air quality analysis, included on pages 4.1-24 through 4.1-27 of the Draft EIR includes an evaluation of long-term air pollutant emissions associated with operation of the proposed project, including emissions from area, energy, and mobile sources, using CalEEMod as recommended by the South Coast AQMD. As stated on page 4.1-28, by design, the localized impacts analysis only includes on-site sources; however, the CalEEMod outputs do not separate on-site and

[15] CARB. 2004. Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. July 22. Website: https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling/about (accessed October 8, 2024).

off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions detailed in Table 4.1.9 of the Draft EIR, stationary, and energy source emissions would occur on site, and 5 percent of the project-related new mobile sources, which is an estimate of the amount of project-related on-site vehicle and truck travel, would occur on site. Additionally, the increased truck trips including those that would occur off site, were included in the trip generation rates used in CalEEMod for the proposed project. These rates were based on the project's trip generation estimates identified in the proposed project's Traffic Analysis (provided in Appendix E of this Draft EIR). The proposed project would generate a total of 406 ADT, including 262 passenger vehicle trips, 50 two-axle truck trips, 16 three-axle truck trips, and 78 four-axle truck trips, which was included in CalEEMod. As such, the commenter is incorrect that the air quality analysis does not include impacts associated with the off-site vehicle trips (including truck trips). Also, the project's small level of trips is marginal given the existing volumes on surrounding streets. Valley View Street is a designated truck route and a "major" roadway in the City's General Plan and, along with Katella Avenue, carries the highest volumes of daily traffic in the City. (General Plan at CIR-4.) Please refer to response IP-1-74 for more details regarding logistic uses.

Response to Comment IP-1-86

This comment refers to the criteria for carbon monoxide evaluation at roadway segment when a project is anticipated to generate 100 or more AM or PM peak trips. The commenter states that the MND does not consider the cumulative impacts of the entire Goodman Commerce Center, nor the impacts of the foreseeable use of the project for logistics purposes. The commenter claims that because these 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 of the MND are likely incomplete or inaccurate.

The City acknowledges this comment. The City has decided to transition to a Draft EIR to further analyze potential impacts of the proposed project. Section 4.6 of the Traffic study in Appendix E of the Draft EIR, describes that it has considered trips from both the Goodman Commerce Center development and the proposed project to develop traffic for the Future year (2025). As such, the future year does consider truck traffic from both the Goodman Commerce Center and the proposed project. Therefore, the cumulative impact has already been analyzed in the study.

Additionally, the analysis of impacts related to GHG emissions is inherently cumulative. Refer to Section 4.5 Green House Gas Emissions, in the Draft EIR, the proposed project would have less than significant GHG emissions if it would result in operational-related GHG emissions of less than 3,000 MT CO_2e per year. Based on the analysis results, the proposed project would result in a net increase of 2,925.9 MT CO_2e per year over existing conditions, which would be below the numeric threshold of 3,000 MT CO_2e. Additionally, the proposed project would have no conflict with applicable Statewide and regional climate action measures. Therefore, GHG emissions impacts associated with the proposed project would be less than significant, and therefore the cumulative impact would also be less than significant.

Response to Comment IP-1-87

The commenter states that the analysis in the MND regarding GHG emissions relies on trip generations from the Traffic Analysis which are claimed to be incomplete and inaccurate. Therefore,

the commenter further claims that the conclusions regarding GHG emissions in the MND are also incomplete and inaccurate.

The City acknowledges this comment. The City has decided to transition to a Draft EIR to further analyze potential impacts of the proposed project. As described in Section 4.5, Greenhouse Gas Emissions, of the Draft EIR, the proposed project trip generation estimates from the Traffic Analysis were used in the CalEEMod for the analysis of Greenhouse Gas Emissions. Additionally, page 4.5-18, under Threshold GHG-1 discussed that the proposed project would generate a total of 406 average daily trips (ADT), including 262 passenger vehicle trips, 50 two-axle truck trips, 16 three-axle truck trips, and 78 four-axle truck trips. The analysis is adequate as presented and no further evaluation is necessary.

Response to Comment IP-1-88

This comment refers to the "less than significant" GHG emissions South Coast AQMD threshold of 3,000 MT CO_2e per year. The commenter claims that the MND states the 5665 Redevelopment is anticipated to exceed the South Coast AQMD threshold, but then concludes that there is a less than significant impact because the net increase of such GHG emissions is less than the 3,000 thresholds. The commenter claims that the MND utilized the threshold based on total GHG emissions, not the net increase, and that the MND should have included a detailed review of GHG emissions.

The City acknowledges this comment. The City has decided to transition to a Draft EIR to further analyze potential impacts of the proposed project. As stated in Response to Comment IP-1-86, the Draft EIR concluded that the proposed project would result in a net increase of 2,925.9 MT CO_2e per year over existing conditions, which would be below the numeric threshold of 3,000 MT CO_2e and operation of the proposed project would not generate significant GHG emissions that would have a significant effect on the environment.

Response to Comment IP-1-89

The commenter claims that the analysis fails to evaluate the effects of off-site GHG emissions that are reasonably foreseeable given the location of the Goodman Commerce Center and its foreseeable use as a logistics center.

The City acknowledges this comment. Please refer to Response to Comment IP-1-85. Additionally, the City of Cypress does not allow logistic centers as a land use and prohibits logistic centers within the Cypress Zoning Code. Greenhouse gases are, by nature, cumulative. The commenter has not presented any evidence that localized impacts could result from GHG emissions.

Response to Comment IP-1-90

The commenter claims that the MND was prepared under the assumption that the 5665 Redevelopment is separate from the 5757 Redevelopment, which they argue improperly segments the Goodman Commerce Center. The commenter claims that the MND does not account for the logistics use of the Goodman Commerce Center. The commenter highlights that, due to these inaccurate assumptions, the conclusions reached in the MND are also inaccurate.

The City acknowledges this comment. Please refer to response IP-1-2.

Further, the Draft EIR the proposed project was prepared in accordance with CEQA and State CEQA Guidelines, ensuring a thorough evaluation of the project's potential environmental impacts. Additionally, the City of Cypress does not allow logistic centers as a land use and prohibits logistic centers within the Cypress Zoning Code. As such, the assumptions, the conclusions reached in the Draft EIR are accurate.

Response to Comment IP-1-91

This comment refers to Section 4.9(b) of the MND and claims that it concludes less than significant impact with mitigation incorporated, but does not provide a mitigation measure, concluding that no mitigation is required. The commenter claims that the MND failed to eliminate significant impacts and that an EIR must be prepared.

The City acknowledges this comment. The City has decided to transition to a Draft EIR to further analyze potential impacts of the proposed project.

This is a typographical error. The Initial Study to the Draft EIR (Appendix B) was s revised on page 4.9.3 to update the impacts related to the release of hazardous materials for Threshold Topic 4.9 (b) to "Less than Significant." This revision was made to be consistent with the text under this threshold for hazardous materials impacts in the Initial Study which identifies a less than significant impact with no mitigation. This revision clarifies the proposed project's impacts and has no effect on the analysis in the Initial Study.

Response to Comment IP-1-92

This comment refers to the conclusions made in the MND based on comparing the proposed project to the existing office building. The commenter recommends that the analysis draw conclusions based on the cumulative impacts of the Goodman Commerce Center and not the variance between existing office building and the single warehouse building at 5665 Plaza Drive.

The City acknowledges this comment. Please refer to Response to Comment IP-1-2. Additionally, CEQA is concerned with potential environmental impacts caused by a project, which means *changes* in the environment. To that end, CEQA contemplates that a project's potential impacts are compared to existing conditions, or the environmental baseline. (*North County Advocates v. City of Carlsbad* (2015) 241 Cal.App.4th 94, 105-106 [a traffic baseline that was based on past usage/occupancy was appropriate].) "To decide whether a given project's environmental effects are likely to be significant, the agency must use some measure of the environment's state absent the project…." (*Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 315.) An analysis that uses a baseline condition that reflects "what was actually happening at the site" complies with CEQA. (*Citizens for East Shore Parks v. California State Lands Com.* (2012) 202 Cal.App.4th 549, 560.)

Response to Comment IP-1-93

This comment refers to the cumulative development tables in the Traffic Analysis which note the cumulative impact analysis of the proposed project and other nearby developments but does not identify the cumulative truck traffic. The commenter claims that despite most of the parcels neighboring the proposed project being used for industrial purposes, the table contemplates cumulative effects of the proposed project with residential office, hotel, retail, and 5757 Plaza Drive as the only industrial project. The commenter claims that evaluating only the cumulative number of total vehicles generated rather than cumulative environmental impacts fall short of CEQA requirements.

The City acknowledges this comment. The City has decided to transition to a Draft EIR to further analyze potential impacts of the proposed project. As described in Section 4.6 of the Traffic Analysis (Appendix E), the Traffic Analysis has considered trips from the proposed project together with trips from the Goodman Commerce Center to develop traffic for the Future (2025) year. As such, the future year does consider truck traffic from both the Goodman Commerce Center Project and the proposed project. Therefore, the cumulative impact has already been analyzed in the study. Therefore, the analysis is adequate as presented and no further evaluation is necessary.

Response to Comment IP-1-94

The commenter states that neighboring commercial and residential owners are entitled to accurate information regarding the effects of the Goodman Commerce Center project and the proposed project, including information related to truck traffic and refrigerated truck traffic. The comment notes that both project parcels are located in the Center of the Park (Cypress Business Park), which is used for light industrial, and office uses. Warland believes that without an EIR, it is difficult to know what mitigation is appropriate to address the additional congestion, noise, and air pollution which could result from the operation of the planned 581,662 square foot logistics facility. Warland states that a full EIR must be completed that includes evaluation of the cumulative environmental impact of the Goodman Commerce Center (which commenter characterizes as The Goodman Commerce Center Project and the proposed project) and its uses as a logistics center.

The City acknowledges this comment. The City has decided to transition to a Draft EIR to further analyze potential impacts of the proposed project.

As stated in Section 4.6 of the TIA in Appendix E, trips from the Goodman Commerce Center Project and the proposed project have been analyzed to develop traffic for the Future Year (2025). As such, the future year does consider truck traffic from both the Goodman Commerce Center development and the proposed project. Therefore, the cumulative impact has already been analyzed in the study.

As stated in Section 4.5, Noise, and Appendix F of the Draft EIR, daytime noise contour from operations and the 55 dBA L_{eq} nighttime noise contour from operations would not approach the closest noise-sensitive uses. The estimated noise level at the closest noise-sensitive uses would be less than 34 dBA L_{eq}. Additionally, the proposed project would not substantially increase noise levels over existing conditions. Therefore, this impact would be less than significant. Standard Condition NOI-1 was also presented in Section 4.5 to ensure the compliance with the construction hours specified in the City's Municipal Code.

Additionally, the air quality analysis, included in Section 4.3, Air Quality (page 4.3-9), of the Draft EIR, includes an evaluation of criterion pollutants. As stated on page 4.1-26, operational emissions associated with the proposed project would not exceed the significance criteria for daily volatile organic compounds (VOCs), nitrogen oxides (NO_X), carbon monoxide (CO), sulfur oxides (SO_X), particulate matter less than 10 microns in diameter (PM_{10}), or particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) emissions. Operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State Ambient Air Quality Standards (AAQS).

Additionally, please refer to Response to Comment IP-1-2 for a detailed response regarding the proposal for the proposed project and the previously approved Goodman Commerce Center Project.

Further, the Draft EIR the proposed project was prepared in accordance with CEQA and State CEQA Guidelines, ensuring a thorough evaluation of the project's potential environmental impacts.

Additionally, the City of Cypress does not allow logistic centers as a land use and prohibits logistic centers within the Cypress Zoning Code. The commenter is referred to Response to Comment IP-1-74.

Response to Comment IP-1-95

The commenter claims that a full analysis of the project as whole which they consider as 5665 and 5757 Plaza Drive combined, may identify impacts that need to be mitigated or may not be mitigated to a less than significant level. The commenter then provides concluding remarks.

The City acknowledges this comment. Please refer to Response to Comment IP-1-2.

Response to Comment IP-1-96

IP-1-96 is a repeat of Responses to Comments IP-1-70 through IP-1-95. Please refer to Responses to Comments IP-1-70 through IP-1-95, for a detailed summary and response to this comment.

Response to Comment IP-1-97

This comment refers to the 5665 and 5757 Plaza Drive projects as the "Goodman projects". This The commenter notes that they previously reached out to address Warland's concerns about increased truck traffic resulting from the redevelopment of 5757 Plaza and inaccuracies in the associated traffic study. They enclose that correspondence for reference. The commenter expresses similar concerns regarding the redevelopment of the proposed project, which will add another large warehouse adjacent to the warehouses at 5757 Plaza. The commenter claims that this will significantly increase truck traffic at the intersection compared to current conditions and those when the existing office buildings were fully occupied. The commenter also claims that the "Goodman projects" will have a substantial impact on users of the intersection and the surrounding area.

The City acknowledges this comment. As stated in Section 4.6 of the TIA in Appendix E, trips from the Goodman Commerce Center Project and the proposed project) have been analyzed to develop traffic for the Future Year (2025). As such, the future year does consider truck traffic from both the

Goodman Commerce Center development and the proposed project. Therefore, the cumulative impact has already been analyzed in the study.

Response to Comment IP-1-98

The commenter states that the "Goodman projects" would increase the warehouse space on the proposed project and 5757 Plaza by over 300,000 square feet, dramatically changing the extent and nature of truck traffic entering and exiting the intersection. The commenter further claims that the truck traffic alone would have significant adverse effects on users of the buildings located at and near the intersection through traffic-related frustrations. The commenter notes that three of the four corners of the intersection are currently occupied by office tenants only.

The City acknowledges this comment, including the commenter's reference to the 5665 Plaza Drive project and the Goodman Commerce Center project as independent projects. The proposed project would not dramatically change the extent and nature of the truck traffic. As shown in Table 4.7.1: Existing Intersection Level of Service Summary (2023) Conditions, on page 4.7-6 of the Draft EIR, the proposed project describes that all existing study area intersections are currently operating at acceptable LOS during the peak hours. Also as described on page 4.7-11 and 4.7-12, the proposed project is anticipated to generate a net increase of 196 two-way trips per day with a net reduction of 28 a.m. peak hour trips and a net reduction of 22 p.m. peak hour trips (in passenger car equivalents [PCE]). Since the proposed project is likely to generate fewer than 50 net new peak-hour trips and fewer than 25 net new peak-hour trips at any single intersection, the implementation of the proposed project is not anticipated to result in any operational or LOS deficiencies; therefore, no further study is necessary. Additionally, the proposed project would also be required to comply with the City's transportation-related goals, policies, and metrics for determining traffic impacts, as well as the Orange County Congestion Management Program (CMP) (2019). The Draft EIR's cumulative analysis evaluated impacts associated with trips from both the project and the Goodman Commerce Center project.

Response to Comment IP-1-99

This comment includes general remarks regarding Warland's position on the redevelopment of the business park. The commenter claims that while the concerns raised should not overshadow the City's interests in redeveloping and modernizing parts of the Park, including the Goodman projects, these redevelopments are essential for the Park's overall success. The commenter is concerned that the interests of the community, particularly existing residential and commercial property owners and tenants, must be considered and addressed. The commenter states that applicable law requires environmental studies to accurately reflect the overall impacts of redevelopment, allowing surrounding property owners to provide necessary feedback for informed decision-making regarding appropriate mitigation measures.

The City acknowledges this comment. In compliance with Section 15201 of the State CEQA Guidelines, the City has provided opportunities for public participation in the environmental process. The City distributed a Notice of Preparation (NOP) on May 7, 2024, to the California State Clearinghouse, responsible agencies, and interested parties for a 30-day public review period. The NOP was circulated for review from May 7 to June 5, 2024.

Additionally, as required by State CEQA Guidelines Section 15087, the City provided a public Notice of Availability (NOA) of the Draft EIR for the proposed project at the same time it filed a Notice of Completion with the State Clearinghouse. The Draft EIR circulated for public review for a period of 45 days, from August 12, 2024, to September 27, 2024. The proposed project was circulated in compliance with CEQA Guidelines and has given the public the opportunity to provide feedback.

The proposed project and its associated technical studies accurately reflect the project and include recommended mitigation measures, as necessary. Furthermore, the project prescribes mitigation measures to reduce any potential impacts to less-than-significant levels.

Response to Comment IP-1-100

The commenter claims that the environmental studies for the proposed project must consider both the project itself and the cumulative impacts of the Goodman projects (proposed project and the Goodman Commerce Center Project), especially since both properties were acquired together by Goodman in September 2021. The commenter emphasizes that this indicates the potential for the new warehouse facilities to operate as a single project. The commenter points out that CEQA requires the City to assess the short- and long-term impacts on air quality, traffic, and noise, both individually and cumulatively. They argue that omitting this cumulative impact analysis means the CEQA review for the Goodman projects does not meet legal standards.

The City acknowledges this comment. Please refer to Response to Comment IP-1-72. Additionally, Sections 4.1 (Air Quality), 4.6 (Noise), and 4.7 (Transportation) in the Draft EIR provide a discussion regarding cumulative impacts on air quality, noise, and traffic. All potential impacts related to air quality, noise, and traffic—both individual and cumulative—would be reduced to less-than-significant levels, as discussed in the above sections.

Response to Comment IP-1-101

The commenter suggests minimizing the Goodman projects' impacts to the intersection and surrounding area by requiring long haul trucks to use designated truck routes. The commenter recommends that instead of being routed to Valley View Street via Plaza Drive, vehicles should be required to access and depart the Goodman projects utilizing Douglas Drive to Katella Avenue to the 605 freeway. The commenter claims that the City has historically imposed this on similar developments.

The City acknowledges this comment. As stated on page 4.7-14 in Section 4.7 of the Draft EIR, traffic from the proposed project traveling to and from Valley View Street via Plaza Drive would head northbound on Valley View Street. Any southbound traffic on Valley View Street or eastbound traffic on Katella Avenue would originate from the intersection of Douglas Drive/Warland Drive. Trucks traveling from the proposed project building would utilize Plaza Drive to Valley View Street and Douglas Drive to Katella Avenue. A portion of the truck trips would continue east on Katella Avenue while the remainder of trucks would travel south on Valley View Street, consistent with the City's approved truck routes.

Response to Comment IP-1-102

This comment contains concluding remarks regarding Warland's position within the Cypress Business Park.

This comment does not contain any substantive comments or questions about the environmental analysis, or conclusions contained in the Draft EIR. No further response is required.

Response to Comment IP-1-103

This comment contains a summary of Warland's interest in the Goodman Commerce Center project and the timeline of project components such as the traffic studies. The commenter refers to discrepancies between the January and February version of the Traffic Study.

The City acknowledges this comment. Based on correspondence with City staff, the traffic study utilized 2022 traffic counts due to the lack of tenancy and trip generation for the proposed project and the adjacent Goodman Commerce Center Project in 2023. In its existing condition, the office building is currently vacant and generates only incidental vehicle trips. Using 2023 traffic counts would lead to artificially low traffic counts in the project area. Additionally, as described in the traffic memo dated February 20, 2024, in Appendix E of the Draft EIR, "the existing office building was approximately 41 percent occupied; however, to avoid overstating existing credit for the office use and to conduct a conservative analysis for the 2024 Traffic Study, it was assumed that only 25 percent of the building space was occupied to account for existing tenants who could be underutilizing their space. However, current entitlements for the office building would allow for 100 percent occupancy without any further discretionary action by the City. As such, the following trip generation assessment compares the proposed project (as evaluated in the 2024 Traffic Study) to 100 percent occupancy of the existing 150,626 square foot office building. It should be noted that this memo is not a separate traffic study but a supplement to the TIA prepared in 2023.

Response to Comment IP-1-104

The commenter claims that Warland is enthusiastic about the prospect of redevelopment of certain facilities within the Cypress Business Park but has significant concerns regarding CEQA compliance and overall impacts of this project given its location and intended truck routes.

The City acknowledges this comment. The Draft EIR for the proposed project was prepared in accordance with CEQA and State CEQA Guidelines, ensuring a thorough evaluation of the project's potential environmental impacts. Additionally, Please refer to Response to Comment IP-1-101.

Response to Comment IP-1-105

The commenter claims that when the IS/MND was made available for public comment, the traffic study that was attached misrepresented the impact of the project relative to truck traffic as compared to the existing facility. The commenter further claims that the errors in the January Traffic Study undermine the integrity of the February Traffic Study and questions the reliability of the data and conclusions. The commenter recommends that the City requires a new traffic study from an independent third party to ensure that impacts are accurately represented. In addition, the commenter calls for a new notice period to allow for public review and comment.

The City acknowledges this comment. Please refer to Response to Comment IP-1-103.

Response to Comment IP-1-106

The commenter states that the February Traffic Study indicates the Project will generate 42 additional daily truck trips, nearly 30 percent more than the existing facility if fully occupied. They note that 70 percent of this truck traffic will route to Valley View Street via Plaza Drive, impacting nearby office buildings, while 30 percent will pass through a residential area. The commuter claims that this increased volume of truck traffic will invariably lead to noise, air pollution and safety hazards, including the following:

1. *Significant greenhouse gas emissions from commercial vehicles.*

2. *Traffic impacts, including roadway hazards from heavy commercial vehicle circulation within or near commercial projects.*

3. *Roadway noise impacts, including at night from commercial vehicles.*

4. *Potential significant impacts to public service, including the residential areas located south of the project site.*

5. *Safety risks for pedestrians and cyclists.*

The commenter claims that the Cypress Business Park has been designed to minimize interference from industrial facilities and that the City has prioritized reducing heavy truck traffic's impact on residential areas. To mitigate these issues, the commenter recommends requiring commercial vehicles over 33,000 pounds to use designated routes, specifically utilizing Douglas Drive to Katella Avenue and the 605 freeway, as established for other nearby industrial projects.

The City acknowledges this comment. As stated on page 27 in Appendix E of the Draft EIR, both Katella Avenue and Valley View Street adjacent to the project site are identified as City truck routes. These truck routes serve both the proposed project and future cumulative development projects throughout the study area. Please refer to Exhibit 2 and 3, on pages 1.1-7 and 1.1.-8 of Appendix E, which describe the trip distribution pattern for truck traffic and passenger cars along Valley View Street and Katella Avenue. Additionally, The Interstate 605 (I-605) and Katella Avenue interchange was not evaluated as part of the study area as the project is anticipated to contribute fewer than 50 net new peak hour trips during the morning and evening peak commute hours.

1. As discussed on page 4.5-25, under Section 4.5, Greenhouse Gas Emissions, of the Draft EIR, the proposed project would generate a total of 406 average daily trips (ADT), including 262 passenger vehicle trips. Please refer to Table 4.5.3 on page 4.5-19, which shows the calculated GHG emissions for the proposed project. As shown in Table 4.5.3, mobile sources would be the largest source of GHG emissions for the proposed project at approximately 61 percent of the total project emissions. Energy sources would be the next largest category at approximately 33 percent. Water sources would be approximately 4 percent of the total emissions and waste sources would be approximately 2 percent of the total emissions. Area sources would be approximately less than 1 percent of the total emissions. According to

South Coast AQMD, a project would have less than significant GHG emissions if it would result in operational-related GHG emissions of less than 3,000 MT CO_2e/yr. Based on the analysis results, the proposed project would result in a net increase of 2,925.9 MT CO_2e/yr over existing conditions, which would be below the numeric threshold of 3,000 MT CO_2e. Therefore, operation of the proposed project would not generate significant GHG emissions that would have a significant effect on the environment. As such, impacts related to operational GHG emissions would be less than significant. No mitigation is required.

2. As discussed on page 4.7-14, under Section 4.7, Transportation, of the Draft EIR, "vehicular traffic to and from the project site would utilize the existing network of regional and local roadways that serve the project area. Access to the project site would be provided via two driveways at Plaza Drive and Douglas Drive. The design of the proposed project, including the internal roadways, ingress, egress, and other streetscape changes, would be subject to review by the City's Department of Public Works." Additionally, "the proposed project would contribute fewer than 50 peak hour trips at the intersection of Valley View and Katella Avenue that would fall below the City's threshold for analysis. It is anticipated that Driveway 1 (on Douglas Drive) and Driveway 2 (on Plaza Drive) would be utilized by heavy trucks to access the project site. Driveway 1 is anticipated to be able to accommodate the ingress and egress of heavy trucks as currently designed, providing access to and from the east on Plaza Drive and south on Douglas Drive. Driveway 1 would serve as the primary driveway for heavy trucks accessing the project site. While Driveway 2 would accommodate the ingress and egress of heavy trucks along Plaza Drive, it is recommended that the northwest curb of Driveway 2 be modified to accommodate a 25-foot curb radius for the egress of heavy trucks. Implementation of Mitigation Measure TRA-1, would require the installation of on-site traffic signing and striping. With implementation of Mitigation Measure TRA-1, the proposed project would have a less than significant impact related to transportation hazards.

   In addition, as discussed on page 4.7-16, under Section 5.7.10, Cumulative Impacts, the City of Cypress General Plan Circulation Element identifies LOS D or better as the desired citywide operating standard for most City streets. Please refer to Table 4.7.7 on page 4.7.16, which shows that traffic associated with the proposed project when combined with the cumulative projects would not exceed LOS D. Accordingly, the proposed project in combination with the cumulative projects would not conflict with circulation policies in the General Plan.

3. As discussed in Section 4.6, Noise, of the Draft EIR, the increase in noise associated with project-related traffic would be very small, ranging from 0.0 to 1.7 dBA along the analyzed road segments. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment; These noise level increases are not perceptible by the human ear; therefore, off-site traffic noise impacts would be less than significant. No mitigation is required. Additionally, implementation of the proposed project would generate various on-site stationary noise sources, including heating, ventilation, and air conditioning (HVAC) and dock operations. Noise levels generated by delivery trucks would be similar to noise readings from truck loading and unloading activities, which generate a noise level of 75 dBA L_{eq} at 20 feet. To present a conservative assessment, it is assumed that unloading

activities could occur at half of the 25 docks simultaneously for a period of more than 30 minutes in a given hour. Additionally, at the remaining half of the loading docks, it is conservatively assumed that refrigeration units attached to the trailers would be in operation while waiting to be unloaded. Based on reference measurements, each unit would have a reference noise level of 79.4 dBA at 15 feet. The proposed project would not substantially increase noise levels over existing conditions. Additionally, the proposed project will generate daytime and nighttime operational noise level increases ranging from 60 to 55 dBA Leq. The estimated noise level at the closest noise-sensitive uses would be less than 34 dBA Leq. Therefore, the proposed project would not substantially increase noise levels over existing conditions. Therefore, this impact would be less than significant.

4. As discussed in Section 4.15 of the Initial Study, Appendix B of the Draft EIR, the proposed project would adhere to the development standards described in the City's Municipal Code related to public safety. The proposed project would also be designed to comply with all OCFA requirements, including providing adequate fire flow/structure protection to the project site and providing adequate access for emergency vehicles. Additionally, the proposed project would comply with current editions of the California Building Code, the California Fire Code, and related codes. The proposed project would not increase the City's population, as it proposes a non-residential development. The project site is currently developed with existing office uses; the proposed project would introduce light industrial uses, which are anticipated to require a demand for police services similar to or slightly less than the existing uses on the project site. Therefore, the project would have no impact on the CPD's ratio of police officers per 1,000 residents and would not trigger the need for new or physically altered police facilities. Impacts to police services would be less than significant. Pursuant to the provisions of Government Code Section 65996, the proposed project impacts to schools' facilities would be fully mitigated through payment of the requisite school facility development fees. As such, Regulatory Compliance Measure PS-1, which requires payment of school fees would reduce impacts to a less-than-significant level. Additionally, although the project is anticipated to increase the City's employment by 93 jobs, the number of employees would be minor compared to the amount of parks and recreational space within the City. While it is possible that employees may visit parks and recreational facilities in the City during lunch breaks or after-work hours, it is unlikely that the use of parks by project employees would increase the use of those parks to a level that would contribute to substantial physical deterioration of those facilities. Impacts to parks and recreation facilities would be less than significant.

   In addition, as described in Table 4.11.B, General Plan Consistency Analysis, on page 4.11-4 of the Initial Study, the proposed project is currently characterized by a mix of commercial, warehouse, office, and residential uses. As discussed in Section 4.15, Public Services, and Section 4.19, Utilities and Service Systems, of the Initial Study, the project's impacts on utilities and other public services would be less than significant. Therefore, project implementation would contribute to a well-balanced land use pattern that accommodates the City's existing and future needs for commercial uses while providing adequate community services to City residents. Thus, the proposed project would be consistent with General Plan Land Use Element Goal LU-1.

Moreover, as discussed in Section 4.7, Transportation, of the Draft EIR, the proposed project would not generate significant adverse impacts related to transportation. As discussed in Section 4.1, Aesthetics; Section 4.3, Air Quality; and Section 4.13, Noise, of the Initial Study (Appendix B), the closest sensitive receptors for light, glare, air pollution, and noise would not experience unacceptable levels of noise, odors, dust, light, or glare as a result of project implementation. Therefore, the proposed project would be consistent with General Plan Land Use Element Policy LU-2.4 and would mitigate traffic congestion and unacceptable levels of noise, odors, dust, and light and glare that affect residential areas and sensitive receptors, where feasible.

5. As discussed on page 4.7-5, sidewalks currently exist on both sides of Katella Avenue, Valley View Street, in the vicinity of the project site. Additionally, there is a 10-foot sidewalk along the west side of Douglas Drive between the proposed project down to Katella Avenue to the south. There are pedestrian crosswalks at all signalized intersections in the vicinity of the project site. These facilities provide for pedestrian circulation between the project site and the surrounding areas. Additionally, Katella Avenue and Valley View Street currently accommodate off-street bike paths; there are no on-street bike lanes provided by Katella Avenue. On-street (Class II) bicycle lanes are provided on both sides of Cerritos Avenue (between Walker Street and Denni Street) and Bloomfield Street. The proposed project would not create safety risks for pedestrians and cyclists as the design of the proposed project, including the internal roadways, ingress, egress, and other streetscape changes, would be subject to review by the City's Department of Public Works (page 4.4-14). As such, the proposed project would be required to comply with City General Plan policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The proposed project would also be required to comply with the City's transportation-related goals, policies, and metrics for determining traffic impacts, as well as the 2019 CMP.

Response to Comment IP-1-107

The commenter claims although no specific users of the project have been identified, the design of the 5665 and 5757 Plaza project buildings are well suited for smaller scale third party logistics ("3PL") uses and could significantly increase commercial truck traffic. The commenter recommends that the City restricts any 3PL use of the project now to avoid future issues.

The City acknowledges this comment. Please refer to Response to Comment IP-1-23. The proposed project is not and could not be defined as a logistics center as the City of Cypress does not allow logistic centers as a land use and prohibits logistic centers within the Cypress Zoning Code.

Response to Comment IP-1-108

This comment includes concluding remarks and summarizes Warland's requests for a new traffic study, designated heavy truck routes, and a restriction of any 3PL uses of the project.

The City acknowledges this comment. Please refer to Responses to Comments IP-1-103, IP-1-101, and IP-1-74.

3.0 ERRATA

This section of the Final Environmental Impact Report (EIR) provides changes to the Draft EIR that have been made to clarify, correct, or add to the environmental impact analysis for the proposed 5665 Plaza Drive Project (proposed project). Such changes are a result of further review of, and public comments related to, the Draft EIR. The changes described in this section are generally minor changes that do not constitute significant new information, change the conclusions of the environmental analysis, or require recirculation of the document (*State of California Environmental Quality Act [CEQA] Guidelines* Section 15088.5).

Such changes to the Draft EIR are indicated in this section under the appropriate Draft EIR section. Deletions are shown with ~~strikethrough~~ and additions are shown with underline.

1) The Draft EIR was revised on pages 4.1-20 and 4.1-27 through 4.1-28 Section 4.1, Air Quality, as detailed below.

Page 4.1-20: The nearest sensitive receptors for air quality emissions include a medical office located north of the project site within 960 feet. Other sensitive receptors include the residential homes located north of the project site at approximately 1,398 feet from the project site boundary line. Therefore, the LST for a 3.5-acre site at 960~~1,398~~ feet (~~426~~293 meters) were derived by interpolation.[16] The LST analysis followed the guidance of the South Coast AQMD for evaluating sensitive receptors, discussed in further detail in this analysis. **Table 4.1.6** lists the LST thresholds that apply during project construction and operation. To be conservative, this LST analysis assumes all area, stationary, and energy source emissions would occur on site, and 5 percent of the project-related new mobile sources, which is an estimate of the amount of project-related on-site vehicle and truck travel, would occur on site. These emissions would be compared against the operational threshold.

Table 4.1.6: South Coast AQMD LST Thresholds (lbs/day)

Emissions Source Category	NO_X	CO	PM_{10}	$PM_{2.5}$
Construction (3.5-acre, 426-meter distance)	191.0 ~~213.0~~	4,921.0 ~~7,166.0~~	109.0 ~~153.0~~	51.0 ~~83.0~~
Operations (3.5-acre, 426-meter distance)	191.0 ~~213.0~~	4,921.0 ~~7,166.0~~	27.0 ~~37.0~~	12.0 ~~20.0~~

Source: Final Localized Significance Threshold Methodology (South Coast AQMD 2008).
Note: SRA 17— Central Orange County, 3.5 acres, receptors at 960~~1,398~~ feet (293~~426~~ meters).
CO = carbon monoxide
lbs/day = pounds per day
LST = localized significance threshold
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
South Coast AQMD = South Coast Air Quality Management District
SRA = source receptor area

[16] South Coast AQMD. n.d. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf (accessed May 13, 2024).

Page 4.1-27- 4.1-28: **Impact AQ-3: Less Than Significant Impact.** The South Coast AQMD defines structures that house persons (e.g., children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise) or places where they gather (i.e., residences, schools, playgrounds, child-care centers, convalescent centers, retirement homes, and athletic fields) as sensitive receptors. Sensitive receptors are defined as people who have an increased sensitivity to air pollution or environmental contaminants. The nearest sensitive receptors for air quality emissions include a medical office located north of the project site within 960 feet. Other sensitive receptors include the residential uses approximately 1,398 feet north of the project site boundary line.

As discussed above, LSTs are based on the ambient concentrations of that pollutant within the project SRA and the distance to the nearest sensitive receptor. South Coast AQMD provides LST screening tables for 25-, 50-, 100-, 200-, and 500-meter source-receptor distances. For the proposed project, the appropriate SRA for the LST is the Central Orange County area (SRA 17). While the project site is approximately 8.53 acres, based on the anticipated construction equipment and grading and ground-disturbing activities, it is assumed that the maximum daily disturbed area for the proposed project would be 3.5 acres. Therefore, the LSTs for a 3.5-acre site at 960~~1,398~~ feet (293~~426~~ meters) were derived by interpolation.

By design, the localized impacts analysis only includes on-site sources; however, the CalEEMod outputs do not separate on-site and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions detailed in **Table 4.1.9** assume all area, stationary, and energy source emissions would occur on site, and 5 percent of the project-related new mobile sources, which is an estimate of the amount of project-related on-site vehicle and truck travel, would occur on site. Considering the total trip length included in CalEEMod, the 5 percent assumption is conservative. The results of the LST analysis for both construction and operation of the proposed project are summarized in **Tables 4.1.9** and **4.1.10** below. As shown in **Tables 4.1.9** and **4.1.10,** the proposed project would not result in an exceedance of a South Coast AQMD LST during project construction or operation. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant. Mitigation is not required.

Table 4.1.9: Construction Localized Emissions

Emissions Sources	Pollutant Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Construction Emissions	39.9	28.3	8.8	5.0
South Coast AQMD LST	**191.0 ~~213.0~~**	**4,921.0 ~~7,166.0~~**	**109.0 ~~153.0~~**	**51.0 ~~83.0~~**
Significant Emissions?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (October 2024).
Note: SRA 17— Central Orange County, 3.5 acres, receptors at 960~~1,398~~ feet (293~~426~~ meters).
CO = carbon monoxide
lbs/day = pounds per day
LST = localized significance threshold
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
South Coast AQMD = South Coast Air Quality Management District
SRA = Source Receptor Area

Table 4.1.10: Operational Localized Emissions

Emissions Sources	Pollutant Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions	1.4	10.0	<1.0	<1.0
South Coast AQMD LST	**191.0 ~~213.0~~**	**4,921.0 ~~7,166.0~~**	**27.0 ~~37.0~~**	**12.0 ~~20.0~~**
Significant Emissions?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (October 2024).
Note: SRA 17— Central Orange County, 3.5 acre, receptors at 960~~1,398~~ feet (293~~426~~ meters), on-site traffic 5 percent of total.
CO = carbon monoxide
lbs/day = pounds per day
LST = localized significance threshold
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
South Coast AQMD = South Coast Air Quality Management District
SRA = Source Receptor Area

2) The Draft EIR was revised on page 4.6-7, Section 4.6.3.3 Existing Noise Levels, from "four" to "three" locations near the edge of the project site.

In order to assess the existing noise conditions in the area, long-term (24-hour) noise-level measurements were conducted on October 10 and 11, 2023, using three (3) Larson Davis Spark 706RC Dosimeters at ~~four~~three locations near the edge of the project site. Figure 4.6.1, Noise Monitoring Locations, shows the long-term noise monitoring locations. Table 4.6.5 provides a summary of the measured hourly noise levels and calculated CNEL level from the long-term noise level measurements as well as a brief description of the locations where the measurements were collected. As shown in Table 4.6.5, the calculated CNEL levels range from 54.3 A-weighted decibels dBA CNEL to 62.3 dBA CNEL. Hourly noise levels at surrounding noise-sensitive uses are as low as 41.8 dBA equivalent continuous sound level (Leq) during nighttime hours and 48.8 dBA L_{eq} during daytime hours.

3) The Draft EIR has been revised on page 4.7-4, in Section 4.7.3.1 of the Draft EIR. Revisions to the Draft EIR include revisions to the first bullet point, Plaza Drive, from "Sidewalks are not provided along Plaza Drive" to "There are no sidewalks along Plaza Drive east of the project site" and now includes "Sidewalks are proposed along 5775 and 5885 Plaza Drive on the north side of Plaza Drive." The second bullet point, Douglas Drive, has been revised to remove the sentence, "However, sidewalks are proposed along 5775 and 5885 on the north side of Douglas Drive." The fifth bullet, Walker Street, has also been revised from "undivided" to "divided."

Plaza Drive is an east-west two- lane divided roadway located directly south of the project site and is not a classified General Plan roadway. ~~Sidewalks are not provided along Plaza Drive~~ There are no sidewalks along Plaza Drive east of the project site. However, sidewalks are proposed along 5775 and 5885 Plaza Drive on the north side of Plaza Drive. No on-street parking is permitted.

Douglas Drive is a north-south two-lane divided roadway located south of the project site and connects into Katella Avenue via a signalized intersection and is not a classified General Plan roadway. Sidewalks are provided on the west side along the roadway. ~~However, sidewalks are proposed along 5775 and 5885 on the north side of Douglas Drive~~ No on-street parking is permitted.

Walker Street is a north-south, four-to-five-lane, ~~un~~divided roadway. According to the City of Cypress General Plan Circulation Element (2001), Walker Street is classified as a Secondary Arterial. The average posted speed limit is 40 mph. Sidewalks are provided on both sides of the street. On-street parking is not permitted.

4) The Draft EIR has been revised on page 4.7-7, Section 4.7.3.4, to include the correct VMT/Employee metric of 24.1 in Table 4.7.2 Existing VMT Table Baseline 2020 Orange County VMT per Employee, as shown below.

Table 4.7.2: Baseline 2020 Orange County VMT per Employee

Description	Orange County[1]
Employment	1,710,147
VMT	4 1,174,971
VMT/Employee	24.~~8~~1

Source: *VMT Assessment* (LSA December 2023).
[1] Obtained from Final Draft Guidelines For Evaluating Vehicle Miles Traveled Under CEQA for the County of Orange, September 17,2020.
OCTAM = Orange County Transportation Analysis Model
VMT = vehicle miles traveled

5) The Safety Analysis has been added to the Draft EIR as Appendix E-1, as shown below.

APPENDIX E-1

SAFETY ASSESSMENT

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MEMORANDUM

URBAN | CROSSROADS

DATE: March 14, 2024
TO: Blair Dahl, GLC Cypress LLC
FROM: Jose Alire/Robert Vu, Urban Crossroads
JOB NO: 15593-02 Safety Eval

GOODMAN COMMERCE CENTER SAFETY EVALUATION

The firm of Urban Crossroads, Inc. is pleased to submit the following Safety Evaluation for the Goodman Commerce Center development (**Project**), which is located at 5665 Plaza Drive in the City of Cypress. The purpose of this work effort is to provide a report summarizing the findings of the proposed Project's safety elements.

PROPOSED PROJECT

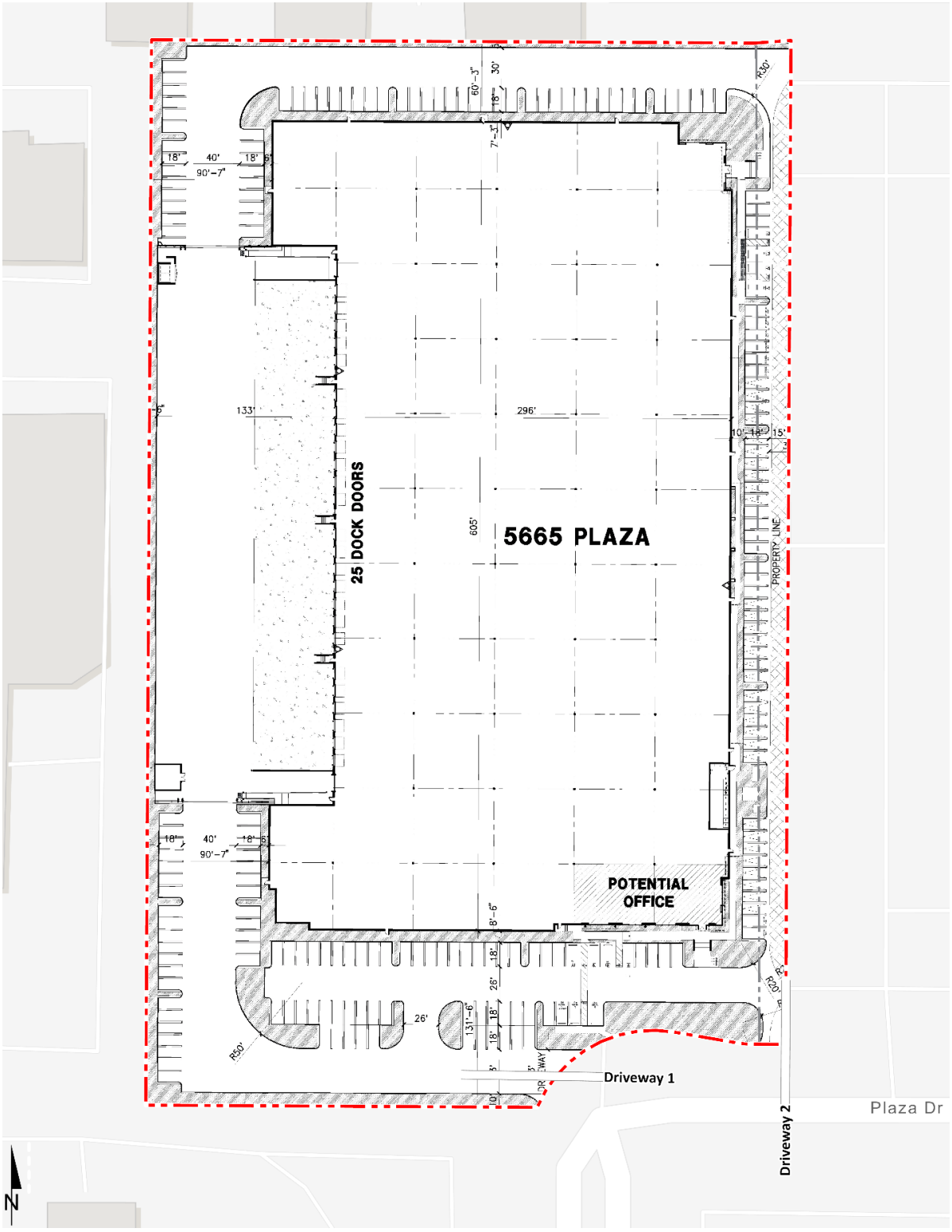
The Project consists of the development of a 191,394 square foot warehouse building. The proposed project will replace an existing 150,626 square foot office building. A preliminary site plan for the proposed Project is shown on **Exhibit 1**. The proposed Project is anticipated to have an Opening Year of 2025. Access to the Project site will be accommodated via two driveways at Plaza Drive and Douglas Drive.

SAFETY EVALUATION METHODOLOGY

The safety evaluation completed for this project included the following elements:

- Review of available collision data
- Review of potential increase presence of pedestrians and bicyclist
- Review of any proposed changes to the walking and bicycling environment and experience.
- New pedestrian and bicyclist connection desires
- Multimodal conflict points, especially at intersections and project access locations.
- Change in traffic mix such as an increase in bicyclists or pedestrians where features such as shoulders or sidewalks may not exist or are inconsistent with facility design (sidewalks, bike and multi-user paths, multimodal roadways, etc.)
- Increased traffic volumes
- Site access management (i.e., driveway sight distance, driveway or intersection spacing, project access queuing, multimodal conflict points, incomplete pedestrian, and bicycle connections)

EXHIBIT 1: PRELIMINARY SITE PLAN



COLLISION DATA

The collision analysis is based on the collision data received from California Highway Patrols' (CHP) Statewide Integrated Traffic Records System (**SWITRS**). The collision data includes 6 years of collision data gathered by CHP staff and members of its Allied Agencies throughout California (including the City of Cypress). However, due to the COVID-19 shutdown starting in March 2020, the 6-year data is effectively a 5-year period due to the lower sample size. This safety evaluation includes all of the 2020 crashes in order to provide a conservative estimate. The SWITRS data is provided in **Attachment A**. **Table 1** provides a summary of the types of collisions by intersection. It should be noted that there may be unreported collisions that were not collected into SWITRS. However, the reported collisions provide reasonable data to evaluate safety performance at these locations.

TABLE 1: COLLISION SUMMARY (JANUARY 2018 TO JANUARY 2024)

Head-On	Sideswipe	Rear-End	Broadside	Hit-Object	Overturn	Auto-Ped	Other	Not Stated
Douglas Dr./Warland Dr. & Katella Ave. (Total: 4 Collisions)								
0 (0.0%)	1 (25.0%)	1 (25.0%)	2 (50.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)
Douglas Dr./Dwy. 2 & Dwy. 1/Plaza Dr. (Total: 0 Collisions)								
0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)
Existing Driveway/McDonnell Dr. & Plaza Dr. (Total: 0 Collisions)								
0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)
Valley View & Plaza Dr./Chip Ave. (Total: 4 Collisions)								
1 (25.0%)	0 (0.0%)	0 (0.0%)	3 (75.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)

The CHP SWITRS collision data includes the following collision types:

- Head-On
- Sideswipe
- Rear-End
- Broadside

The Caltrans 2021 Crash Data on California State Highways report (latest edition) (**2021 Crash Report**) provides data on crash reports collected by law enforcement agencies. Calculation rates by intersection are computed for various types of facilities and settings, and then are averaged statewide. The intersection crash rate is calculated by the following formula:

Crash Rate = Crashes / Million Vehicle (MV) Entering the Intersection

For the purposes of this analysis, average daily traffic (**ADT**) will be utilized to determine the crash rate. Existing weekday ADT volumes are provided in **Attachment B**. Where actual 24-hour tube count data was not available, Existing ADT volumes were based upon factored intersection peak hour counts collected by Urban Crossroads, Inc. using the following formula for each intersection leg:

Weekday PM Peak Hour (Approach Volume + Exit Volume) x 11.3 = Leg Volume

A comparison of the PM peak hour and daily traffic volumes of various roadway segments within the study area indicated that the peak-to-daily relationship is approximately 8.9 percent. As such, the above equation utilizing a factor of 11.3 estimates the ADT volumes on the study area roadway segments assuming a peak-to-daily relationship of approximately 8.9 percent (i.e., 1/0.089 = 11.3) and was assumed to sufficiently estimate ADT volumes for planning-level analyses. The state average crash rates for similar facilities, as determined by the 2021 crash report, to those that are a part of this Project are summarized in **Table 2**. It is not anticipated that the addition of the proposed Project will result in a significant change in collisions due to the number of trips generated or vehicle mix. A summary of the crash rate comparison, by intersection, is shown in **Table 2**.

TABLE 2: CRASH RATE COMPARISON

Intersection	Intersection Control and Setting[1]	Average Rate[2]	Crash Rate
Douglas Dr./Warland Dr. & Katella Ave.	Suburban, TS, 4-leg	0.55	0.11
Douglas Dr./Dwy. 2 & Dwy. 1/Plaza Dr.	Suburban, AWS, 3-leg	0.18	0.0
Existing Driveway/McDonnell Dr. & Plaza Dr.	Suburban, CSS, 3-leg	0.22	0.0
Valley View & Plaza Dr./Chip Ave.	Suburban, TS, 4-leg	0.55	0.11

[1] AWS = All-way Stop; CSS = Cross-street Stop; TS = Traffic Signal

[2] Source: Intersection crash rates from the Caltrans 2021 Crash Data on California State Highways report

Douglas Dr./Warland Dr. & Katella Ave. had a total of 4 reported collisions in a 5-year period. The common collisions include broadside collisions. Broadside collisions are commonly caused by failure to yield, failure to stop, or impaired/distracted driving. The 5-year average rate for this intersection is calculated as followed:

(4 collisions / 5 years) / (365 days/year x (41,450 ADT / 2) / 1,000,000 MV) **= 0.11 total crashes per MV**

The intersection of Douglas Dr./Warland Dr. & Katella Ave. has a lower crash rate than the state average for similar facilities.

Valley View & Plaza Dr./Chip Ave. had a total of 4 reported collisions in a 5-year period. The common collisions include broadside collisions. The 5-year average rate for this intersection is calculated as followed:

(4 collisions / 5 years) / (365 days/year x (41,600 ADT / 2) / 1,000,000 MV) **= 0.11 total crashes per MV**

The intersection of Valley View & Plaza Dr./Chip Ave. has a lower crash rate than the state average for similar facilities.

BICYCLE & PEDESTRIAN FACILITIES

The City's bike network is shown on **Exhibit 2**, which demonstrates both Katella Avenue and Valley View Street currently accommodate off-street bike paths (there are no on-street bike lanes). **Exhibit 3** illustrates the existing crosswalks and sidewalks throughout the study area. As shown, there are pedestrian facilities in place in the vicinity of the Project site along Douglas Drive, Katella Avenue, and Valley View Street. There is a 10-foot sidewalk along the west side of Douglas Drive between the proposed Project down to Katella Avenue to the south. Once the adjacent development to the east completes their project, there will be a 5-foot sidewalk along the north side of Plaza Drive providing pedestrian connectivity between the proposed Project and approximately 450-feet west of Valley View Street. The signalized intersection of Douglas Drive at Katella Avenue has striped crosswalks on all approaches with push buttons. All four corners of the intersection of Douglas Drive at Katella Avenue have tactile warning strips and curb access ramps. The intersection of Valley View Street at Plaza Drive/Chip Avenue does not have a marked crosswalk across the north leg of the intersection. All other approach legs at the intersection include striped crosswalks with the appropriate pedestrian push buttons, tactile warning strip, and curb access ramps. Since the proposed Project has an industrial component, it is not anticipated that the Project will generate a significant increase in pedestrian/bicyclists. Field observations in the study area indicate nominal pedestrian and bicyclist activity and it is expected that the addition of the Project would not change that observation.

INTERSECTION SIGHT DISTANCE

Attachment C identifies limited use areas per Orange County Standard Plan 1117 – Intersection Sight Distance. The limited use areas determine the necessary sight distance to allow 7 ½ seconds for the driver on the crossroad (or left turn pocket) to safely cross the main roadway or turn left while the approach vehicle travels at the assumed design speed of the main roadway. **Table 3** summarizes areas of limited use that currently obstruct sight distance and **Attachment C** shows areas of limited use that obstruct sight distance per Orange County Standard Plan 1117. The intersection sight distance is currently below design standards for the existing development. The lower intersection sight distance may be a factor in existing and potential collisions. It is recommended that all obstructions within the limited use areas are to be removed at this location. Trees and landscaping should be maintained to prevent overgrowth and visual obstructions.

TABLE 3: SIGHT DISTANCE SUMMARY

Intersection	Potential Visual Obstructions on:[1]
Douglas Dr./Warland Dr. & Katella Ave.	N/A
Douglas Dr./Dwy. 2 & Dwy. 1/Plaza Dr.	- Center median on Douglas Dr. - SEC of Douglas Dr./Plaza Dr.
Existing Driveway/McDonnell Dr. & Plaza Dr.	Bend along Plaza Dr.
Valley View & Plaza Dr./Chip Ave.	N/A

[1] N = North. S = South, E = East, W = West, C = Corner, N/A = Not Applicable

TRUCK ACCESS

Attachment D identifies the ingress and egress circulation for the study area (including Project driveways). Due to the typical wide turning radius of large trucks, a truck turning template has been overlaid on the site plan at Driveway 1 and Driveway 2 (at the intersection of Douglas Drive and Plaza Drive) which is anticipated to be utilized by heavy trucks in order to determine appropriate curb radii and to verify that trucks will have sufficient space to execute turning maneuvers. A WB-67 truck (53-foot trailer) has been utilized for the purposes of this analysis. As it is currently designed, Driveway 1, located on Douglas Drive, is anticipated to accommodate the ingress and egress of heavy trucks to and from the east on Plaza Drive and south on Douglas Drive. However, the northwest curb of Driveway 2 should be modified to accommodate a 25-foot curb radius to accommodate the egress of these heavy trucks. Ingress and egress of heavy trucks will also be permitted at Driveway 2 on Plaza Drive. As shown in **Attachment D**, the truck turning templates show acceptable turning movements for the various movements that trucks are anticipated to use for site access, with exception of the following:

- The northwest curb of Driveway 2 should be modified to accommodate a 25-foot curb radius to accommodate the egress of heavy trucks.

SITE ACCESS

Recommendations made in the following section are based on the minimum improvements needed to accommodate site access and maintain acceptable peak hour operations for the proposed Project. The driveway intersection recommendations and roadway improvements are summarized below.

Driveway 2/Douglas Drive & Driveway 1/Plaza Drive (#2) – Project to install a stop control on the southbound approach and eastbound approach (egress Project traffic) to implement an all-way stop-controlled intersection. Driveway 1/Driveway 2 will accommodate site access for passenger cars and trucks and will accommodate full access (no turn restrictions). The northwest curb of Driveway 2 should be modified to accommodate a 25-foot curb radius to accommodate the egress of heavy trucks.

On-site traffic signing and striping should be implemented agreeable with the provisions of the California Manual on Uniform Traffic Control Devices (CA MUTCD) and in conjunction with detailed in the master signing program and construction plans for the Project site.

Sight distance at each project access point should be reviewed with respect to standard Caltrans and City of Cypress sight distance standards at the time of preparation of final grading, landscape, and street improvement plans.

LIGHTING

Orange County Standard Plan 1411 – Street Light provides standards for safety lighting along roadways. Street lighting on local streets is justified at the intersection of two local streets or with a spacing of 300 feet. **Exhibit 2** shows the street lighting in effect at the intersection of Douglas Dr./Dwy. 2 & Dwy. 1/Plaza Dr. Nighttime field observations indicate that the existing street light configuration meets the Orange County Standard Plan 1411 requirements. Relocation of the street light is anticipated in order to accommodate the Project's Driveway 1. The relocation of the street light should be reviewed with respect to standard Orange County and City of Cypress lighting standards at the time of preparation of final grading, landscape, and street improvement plans.

EXHIBIT 2: EXISTING STREET LIGHTING



RECOMMENDATIONS

This review of available collision data indicates that the study area intersections have lower crash rates than the statewide average of intersections with similar configuration and settings. The addition of Project traffic is not anticipated to increase the crash rates by a significant margin.

Frontage improvements proposed by the Project will include sidewalk improvements, driveway modifications to accommodate site access, and landscaping improvements as required by City standards.

It is recommended that all obstructions within the limited use areas are to be removed. Trees and landscaping should be maintained to prevent overgrowth and visual obstructions.

The northwest curb of Driveway 2 should be modified to accommodate a 25-foot curb radius to accommodate the egress of heavy trucks.

Relocation of the street light is anticipated in order to accommodate the Project Driveway 1. The relocation of the street light should be reviewed with respect to standard Orange County and City of Cypress lighting standards at the time of preparation of final grading, landscape, and street improvement plans.

CONCLUSION

The addition of Project-related traffic is not anticipated to cause additional or new safety deficiencies. It is recommended that a review of intersection sight distance, pedestrian/bike facilities, and street facilities be conducted to satisfy CA MUTCD, Orange County, and City of Cypress standards. It is recommended that the Project Applicant coordinate with City staff to meet applicable CA MUTCD, Orange County, City of Cypress, and ADA standards. On-site traffic signing and striping, and sight distance evaluation should be implemented in conjunction with detailed construction plans for the Project site.

If you have any questions or comments, we can be reached at jalire@urbanxroads.com or at rvu@urbanxroads.com.

Respectfully submitted,

URBAN CROSSROADS, INC.



Jose Alire, P.E.
Senior Traffic Engineer



Robert Vu, P.E.
Transportation Engineer

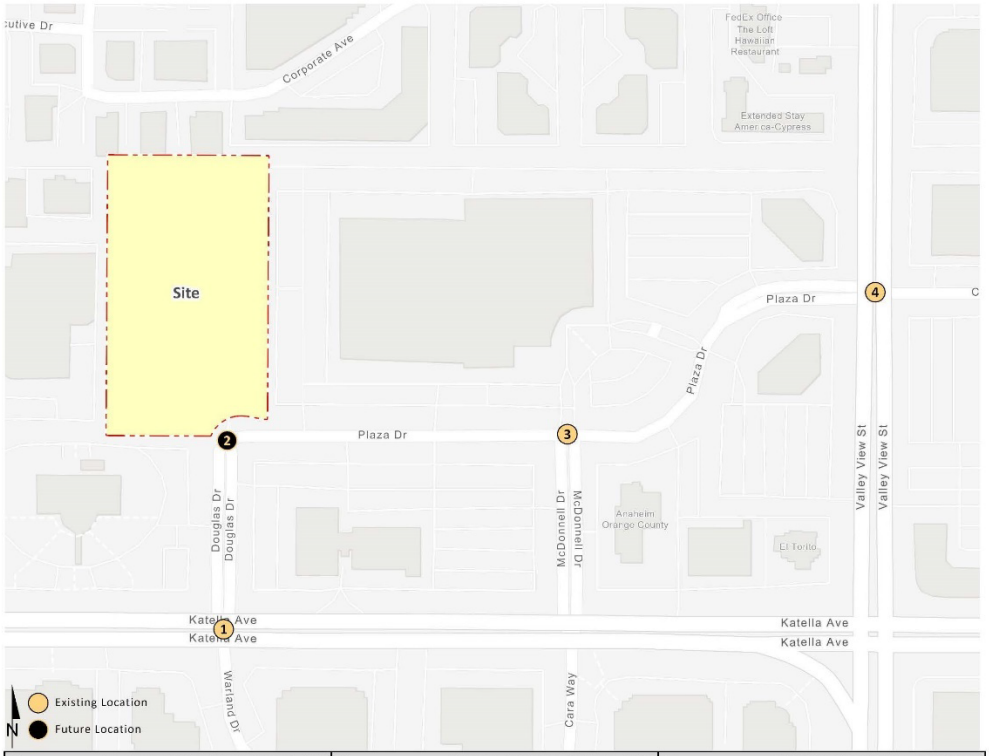
ATTACHMENT A

SWITRS DATA

COLLISION_DATE	COLLISION_TIME	DAY_OF_WEEK	PRIMARY_RD	SECONDARY_RD	DISTANCE	DIRECTION	INTERSECTION	COLLISION_SEVERITY	NUMBER_KILLED	NUMBER_INJURED	PARTY_COUNT	TYPE_OF_COLLISION	PEDESTRIAN_ACCIDENT	BICYCLE_ACCIDENT	MOTORCYCLE_ACCIDENT	TRUCK_ACCIDENT	ALCOHOL_INVOLVED
20190317	1559	7	VALLEY VIEW ST	PLAZA DR	0		Y	3	0	2	2	D					
20190814	1800	3	KATELLA AV	WARLAND DR	0		Y	0	0	0	2	D					
20191009	1552	3	VALLEY VIEW ST	PLAZA DR	0		Y	3	0	2	2	D					
20191219	842	4	VALLEY VIEW ST	CHIP AV	0		Y	4	0	3	2	D					
20200714	853	2	KATELLA AV	DOUGLAS DR	0		Y	4	0	1	2	C					
20201104	2028	3	KATELLA	WARLAND DR	0		Y	3	0	2	2	D			Y		
20210216	1403	2	KATELLA AV	DOUGLAS DR	0		Y	0	0	0	2	B					
20230302	736	4	VALLEY VIEW ST	CHIP AV	0		Y	0	0	0	2	A				Y	

ATTACHMENT B
EXISTING COUNT DATA

EXHIBIT 3-8: EXISTING (2023) TRAFFIC VOLUMES (PCE)



1 Douglas Dr./Warland Dr. & Katella Av.

1,000 | 39,950

15(47) ↲ 1(2) ↓ 2(26) ↳
34(6) ↱ 1782(1608) ← 12(9) ↰
27(11) ↳
1702(1963) →
72(32) ↲
26(83) ↰ 2(1) ↑ 5(7) ↱

42,950 | 1,450

2 Douglas Dr./Dwy. 2 & Dwy. 1/Plaza Dr.

1,350

53(100) ↰
21(24) ↱

1,350

3 McDonnell Dr. & Plaza Dr.

Nominal | 800

0(3) ↓
4(0) ↱ 104(80) ← 8(11) ↰
23(86) →
0(2) ↲
19(5) ↰ 2(0) ↑ 77(9) ↱

1,900 | 350

4 Valley View St. & Plaza Dr./Chip Av.

42,050 | 6,750

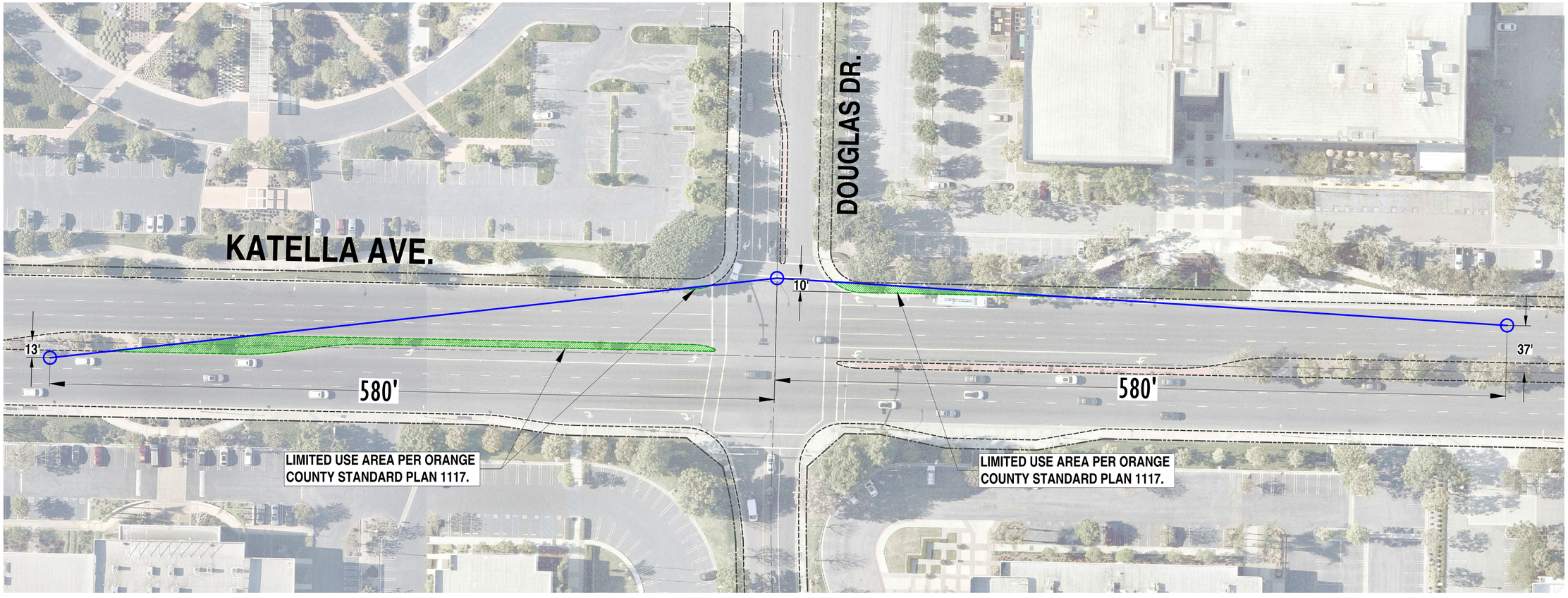
154(23) ↲ 1551(1503) ↓ 254(52) ↳
39(355) ↱ 0(30) ← 12(162) ↰
9(168) ↳
9(0) →
15(61) ↲
22(4) ↰ 1516(1967) ↑ 181(12) ↱

3,200 | 41,150

##(##) AM(PM) Peak Hour Intersection Volumes

Average Daily Trips

ATTACHMENT C
INTERSECTION SIGHT DISTANCE



N

SCALE: 1" = 40' (ON 24" x 36" SHEET)

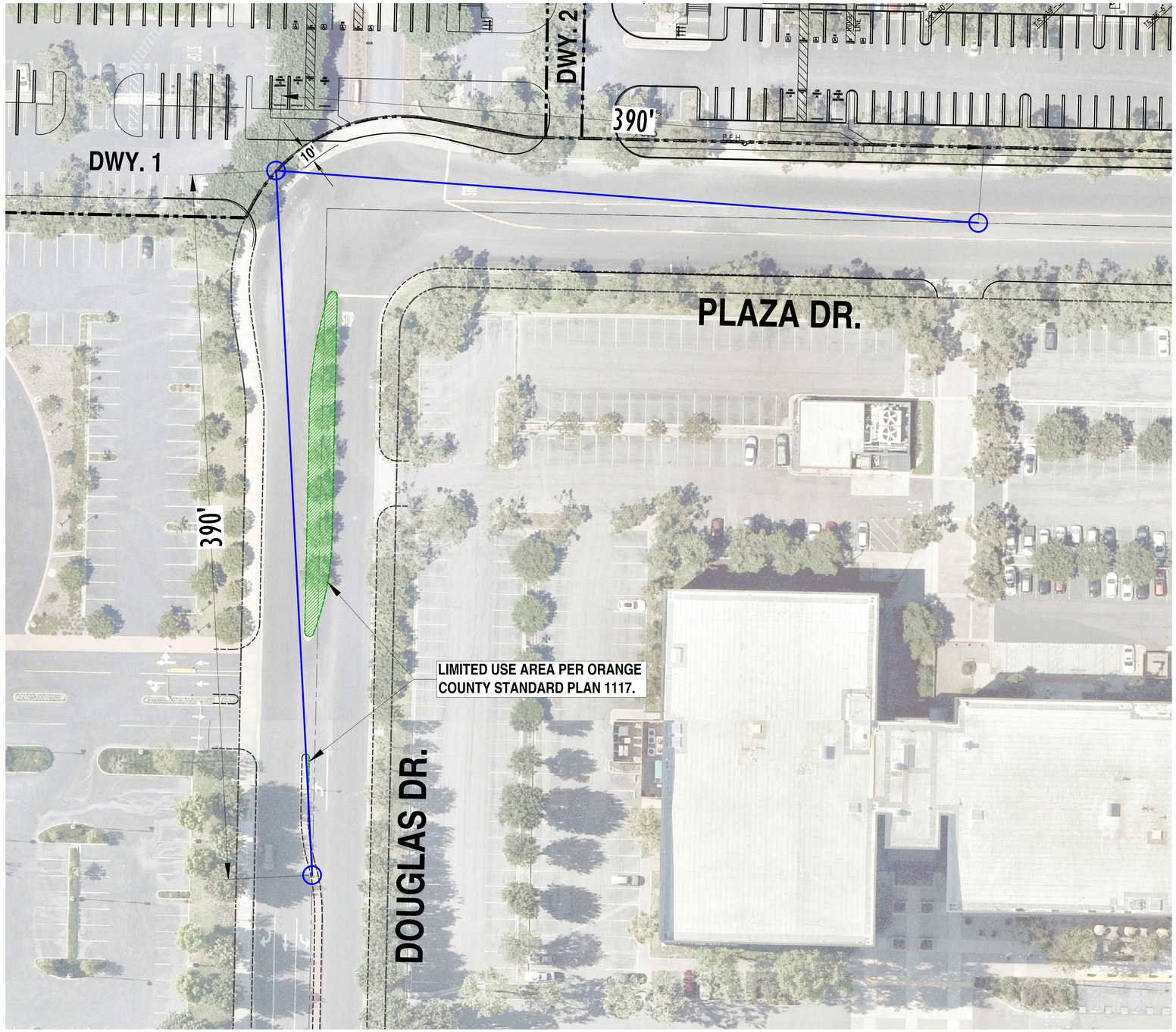
0 20 40 80 120 160

EXHIBIT 1: INTERSECTION SIGHT DISTANCE
KATELLA AVENUE & DOUGLAS DRIVE

URBAN CROSSROADS

WWW.URBANXROADS.COM
TELEPHONE # 949-660-1994

15593 - ACAD\15593-SightDistance_A.dwg - 2/27/24 - OD



SCALE: 1" = 30' (ON 24" x 36" SHEET)

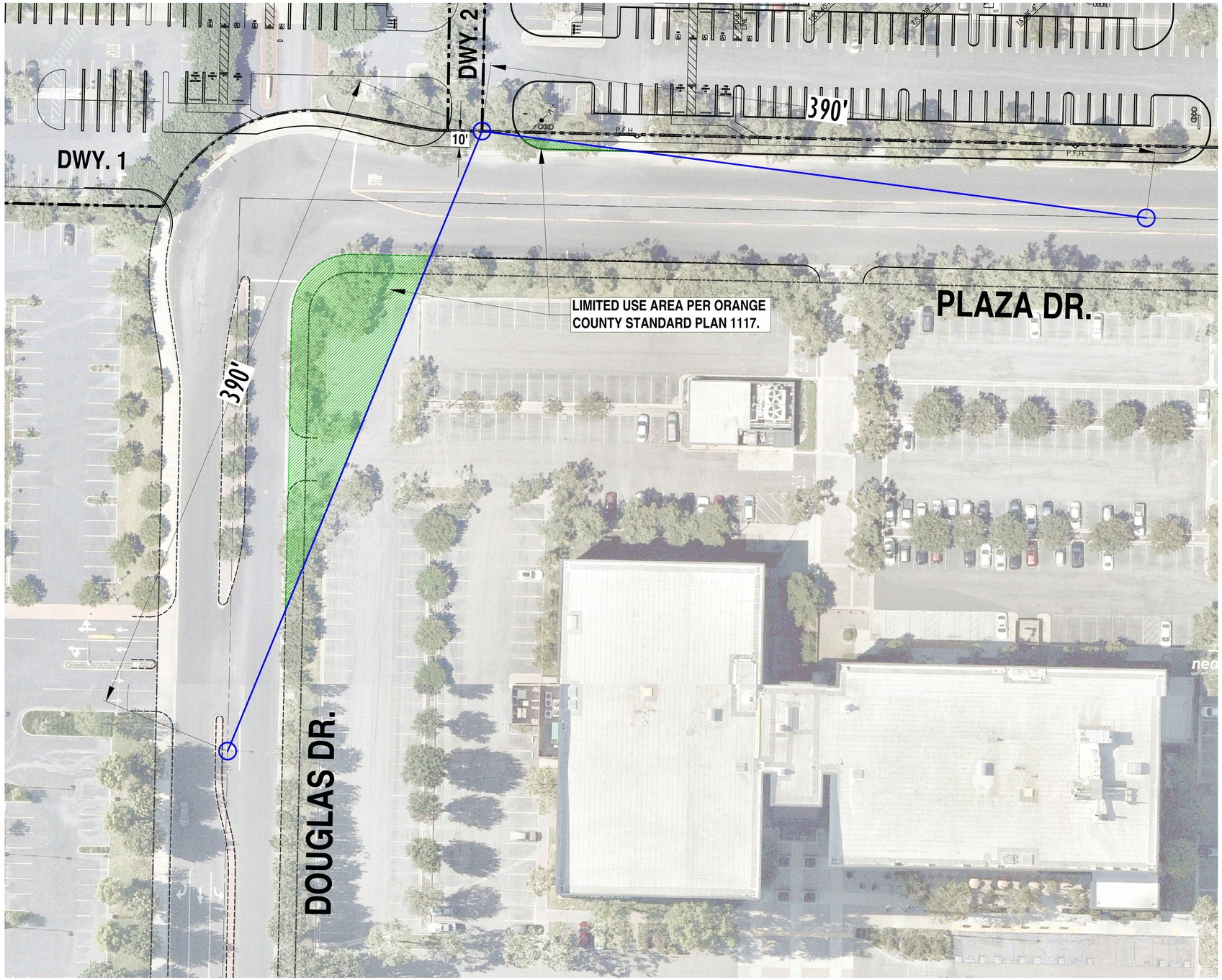
0 15 30 60 90 120

EXHIBIT 2: INTERSECTION SIGHT DISTANCE
DOUGLAS DRIVE & PROJECT DRIVEWAY 1

URBAN CROSSROADS

WWW.URBANXROADS.COM
TELEPHONE # 949-660-1994

15593 - ACAD\15593-SightDistance_A.dwg - 2/27/24 - OD



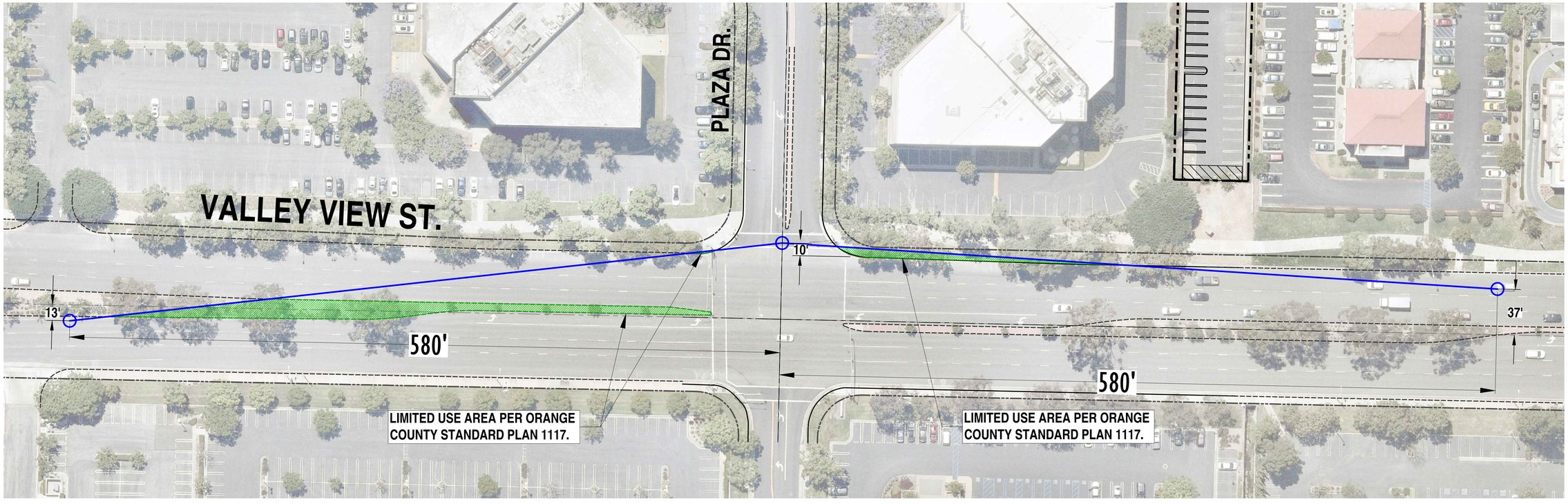
SCALE: 1" = 30' (ON 24" x 36" SHEET)

0 15 30 60 90 120

EXHIBIT 3: INTERSECTION SIGHT DISTANCE
PLAZA DRIVE & PROJECT DRIVEWAY 2

URBAN CROSSROADS
WWW.URBANXROADS.COM
TELEPHONE # 949-660-1994

15593 - ACAD\15593-SightDistance_A.dwg - 2/27/24 - OD



SCALE: 1" = 40' (ON 24" x 36" SHEET)

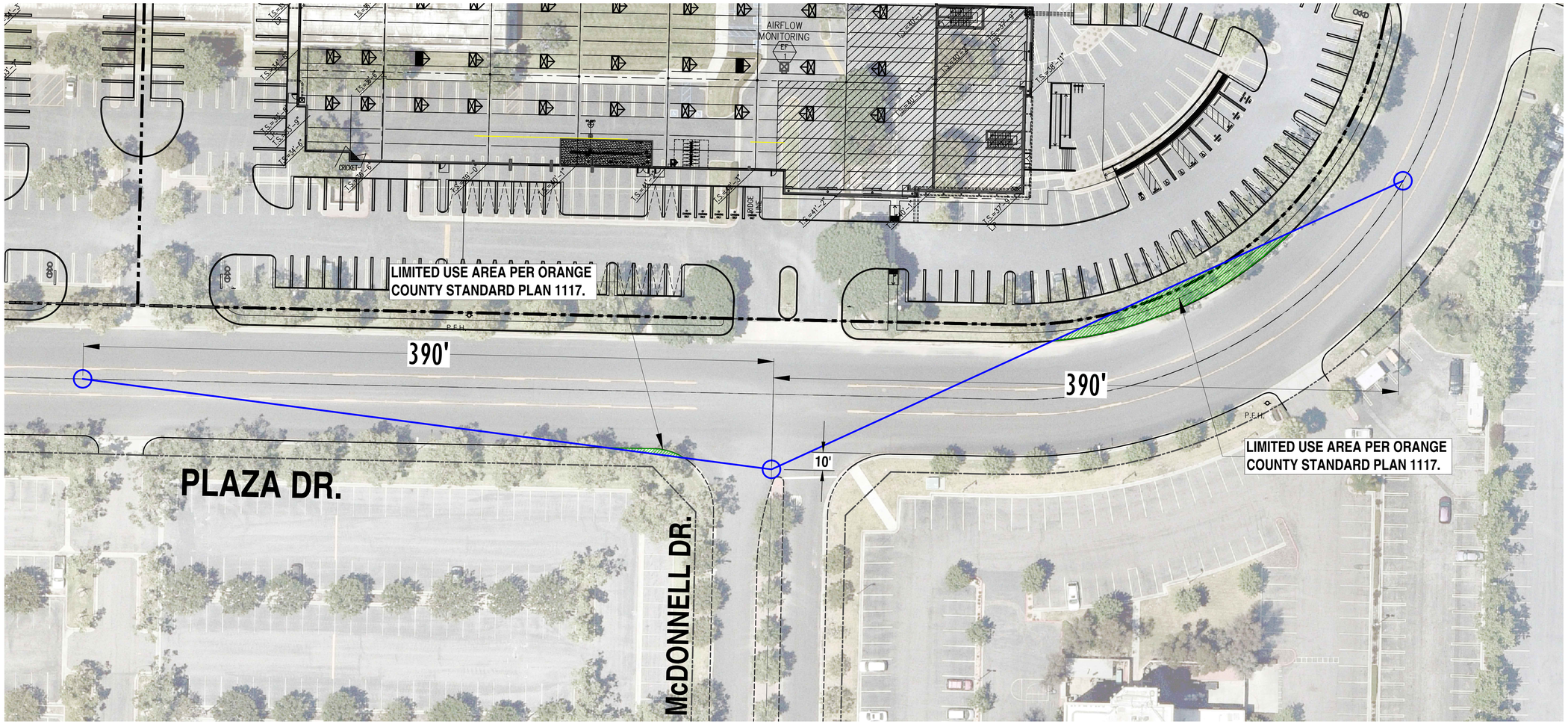
0 20 40 80 120 160

EXHIBIT 5: INTERSECTION SIGHT DISTANCE
PLAZA DRIVE & VALLEY VIEW STREET

URBAN CROSSROADS

WWW.URBANXROADS.COM
TELEPHONE # 949-660-1994

15593 – ACAD\15593–SightDistance_A.dwg – 2/27/24 – OD



SCALE: 1" = 30' (ON 24" x 36" SHEET)

0 15 30 60 90 120

EXHIBIT 4: INTERSECTION SIGHT DISTANCE
PLAZA DRIVE & McDONNELL DRIVE

URBAN CROSSROADS

WWW.URBANXROADS.COM
TELEPHONE # 949-660-1994

15593 - ACAD\15593-SightDistance_A.dwg - 2/27/24 - OD

ATTACHMENT D
VEHICLE TURNING TEMPLATES

EXHIBIT 1-4: INBOUND TRUCK ACCESS AT DRIVEWAY 1

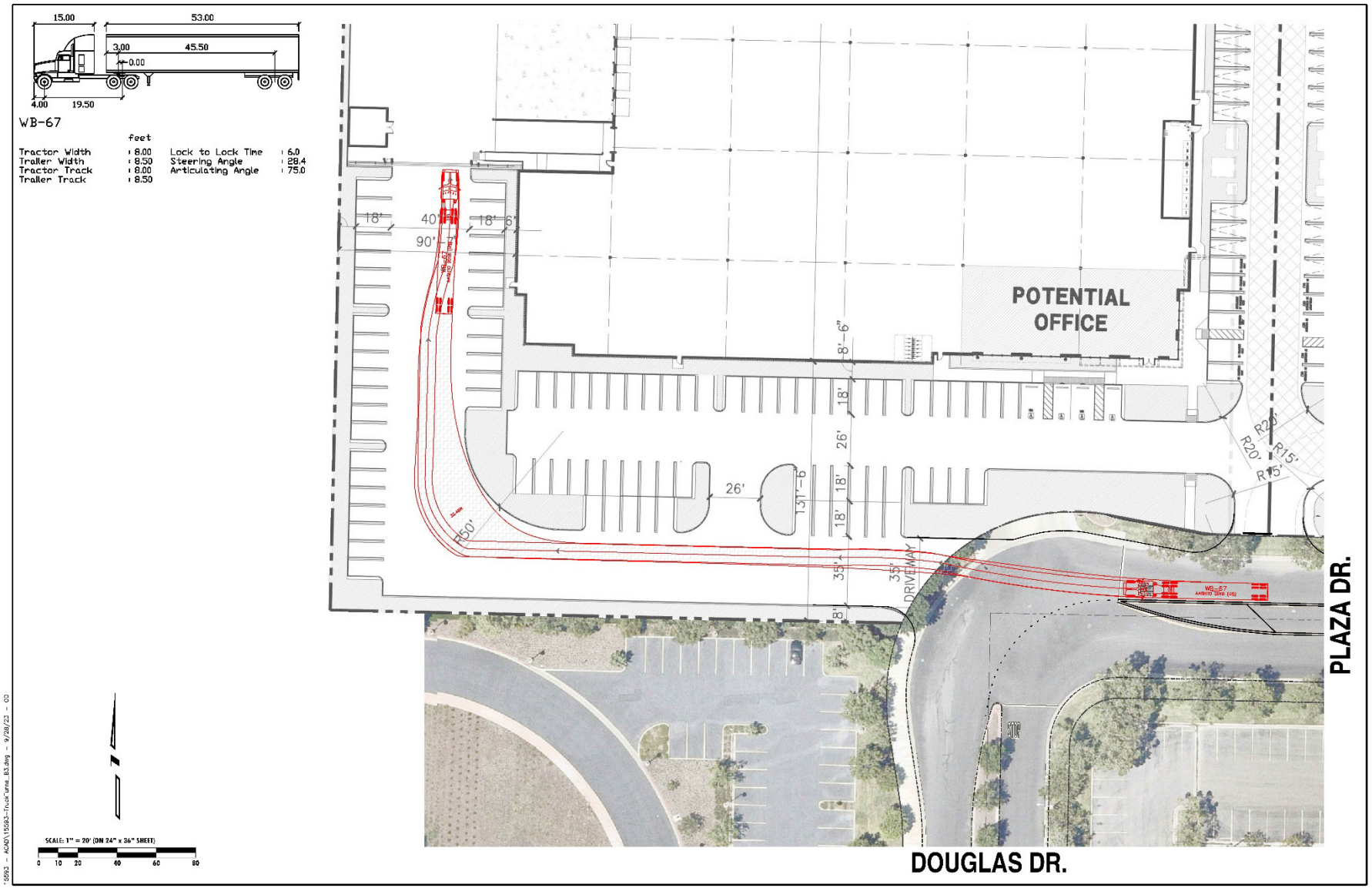


EXHIBIT 1-5: OUTBOUND TRUCK ACCESS AT DRIVEWAY 1

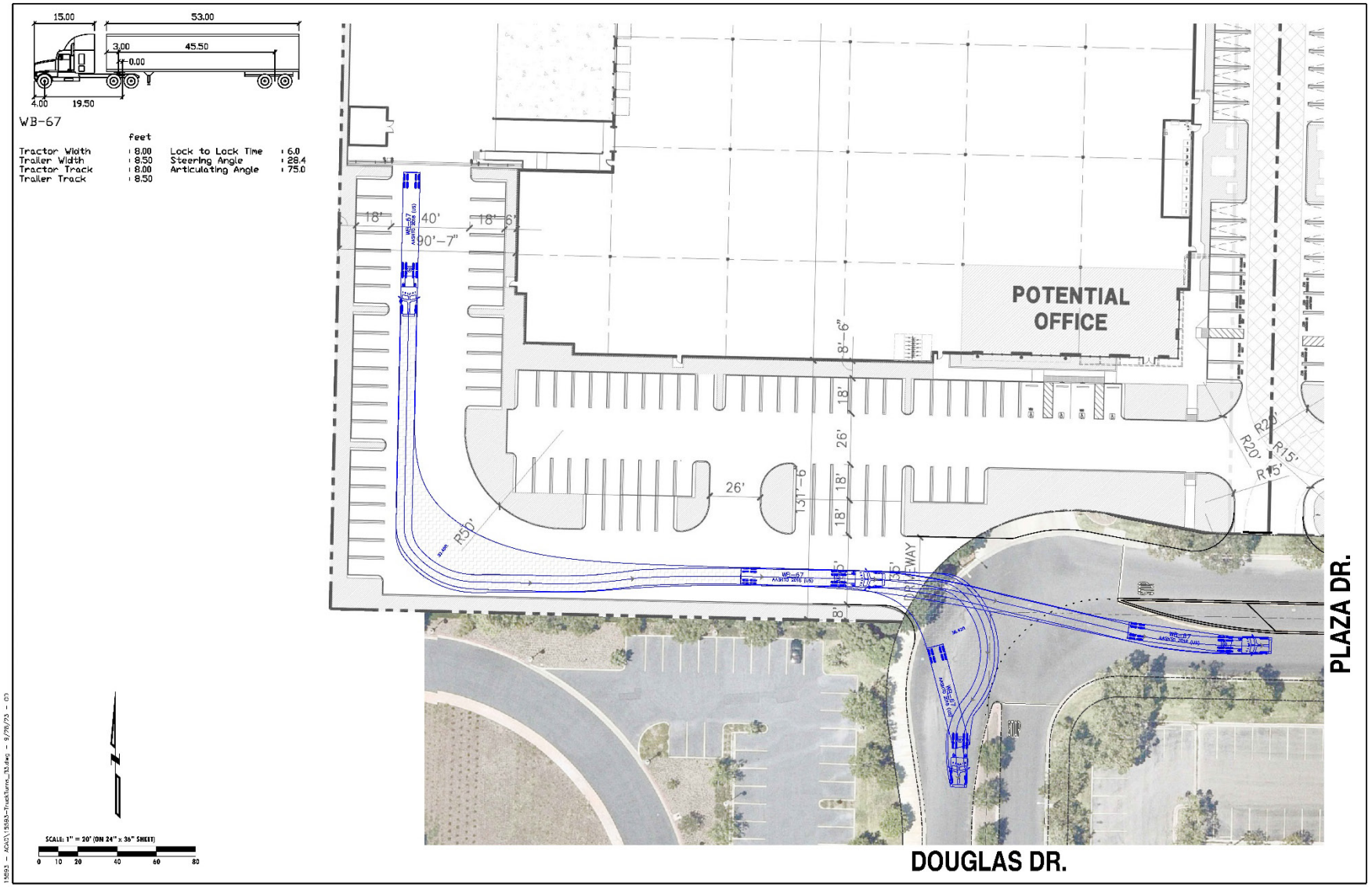


EXHIBIT 1-6: INBOUND TRUCK ACCESS AT DRIVEWAY 2

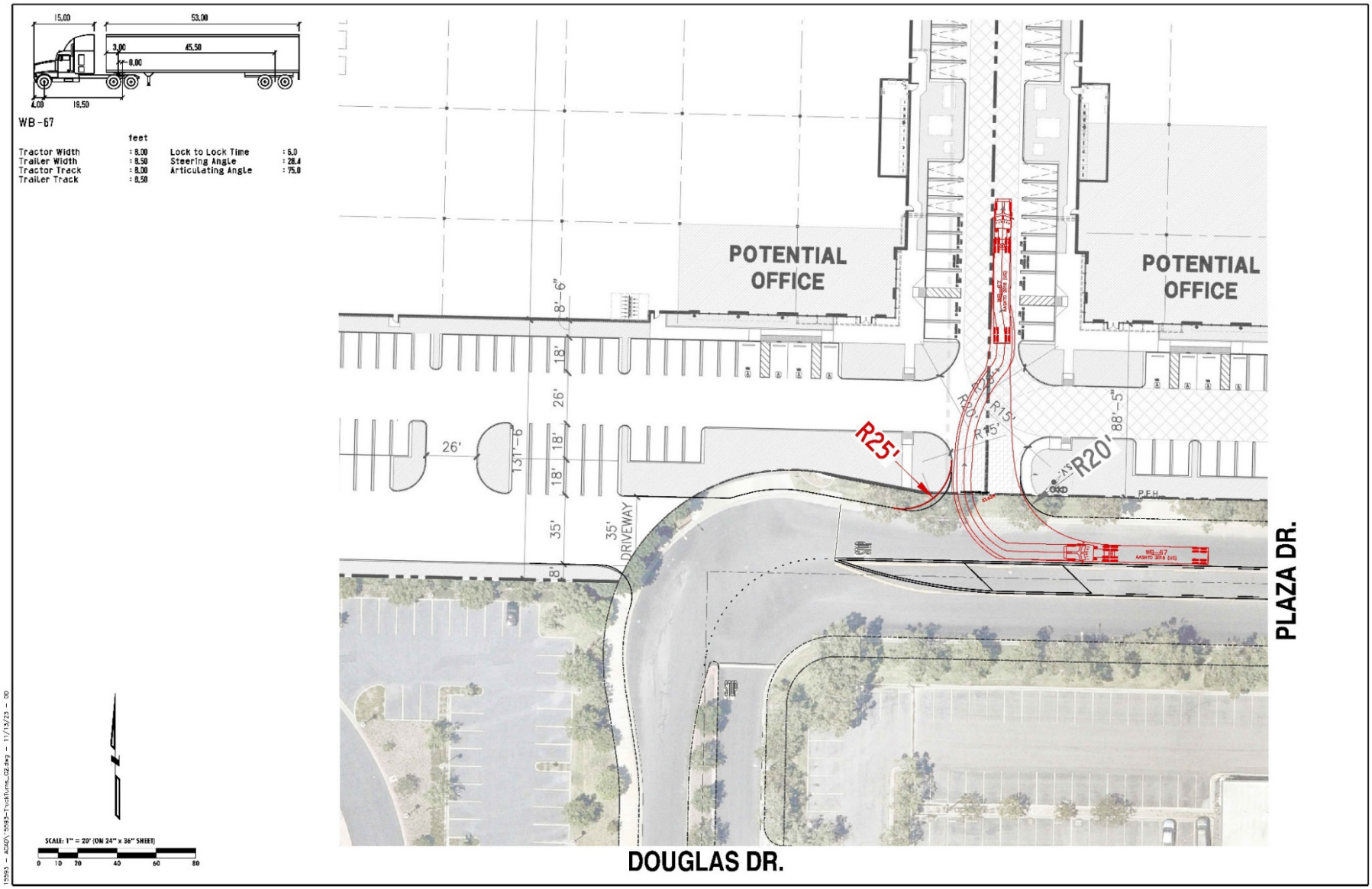


EXHIBIT 1-7: OUTBOUND TRUCK ACCESS AT DRIVEWAY 2

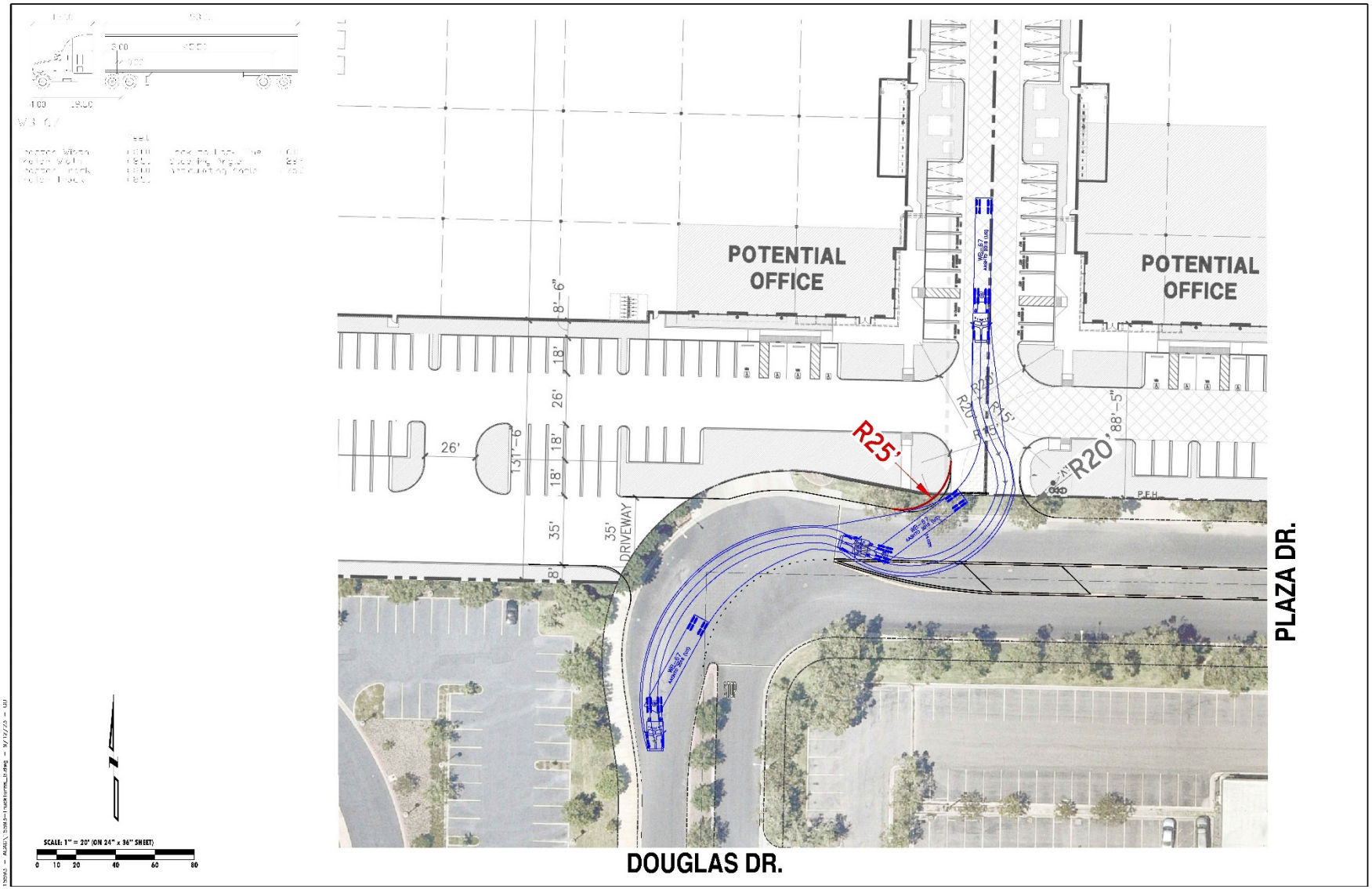


EXHIBIT 1-8: INBOUND ON-SITE TRUCK CIRCULATION VIA DRIVEWAY 2

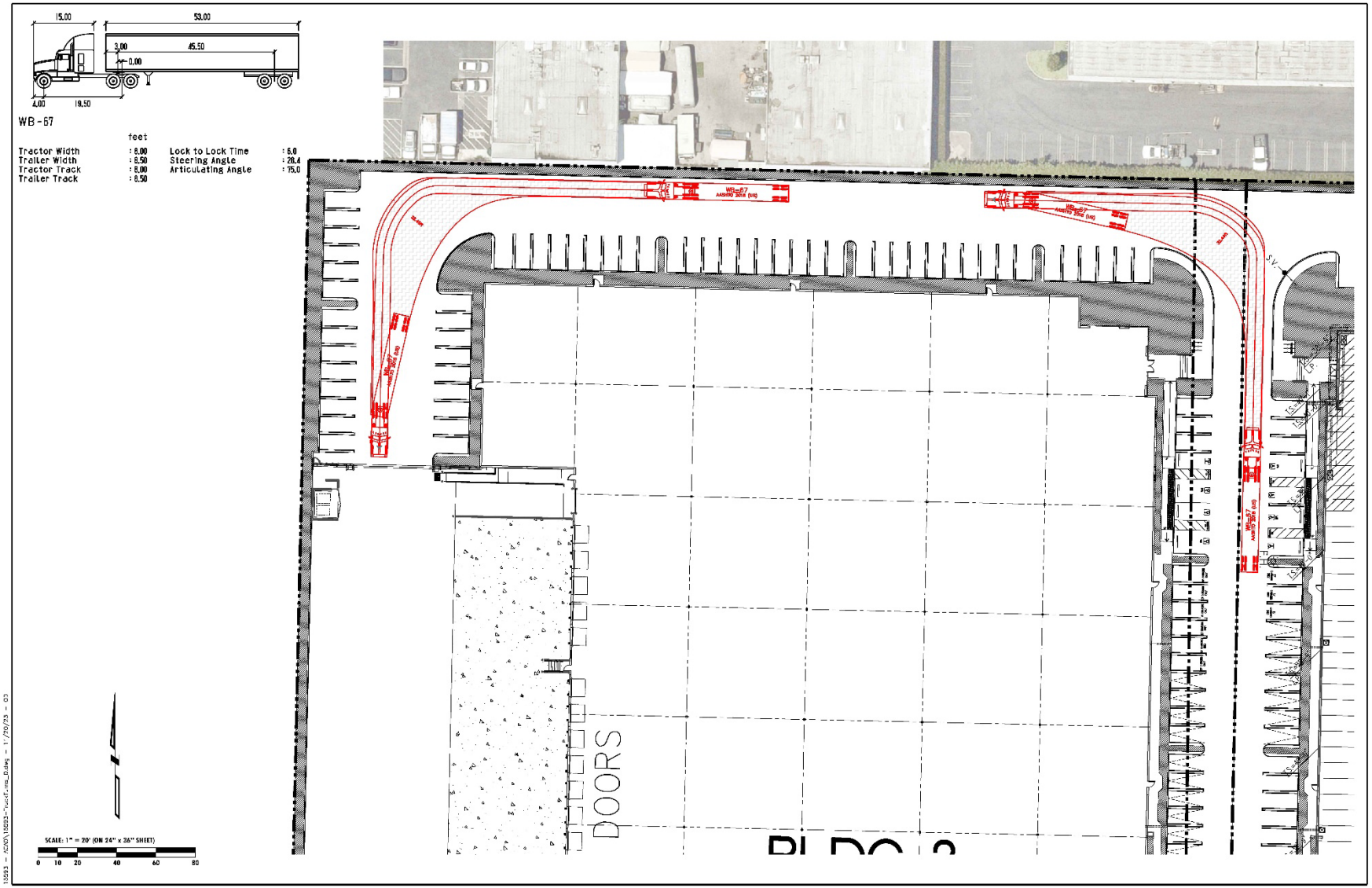


EXHIBIT 1-9: OUTBOUND ON-SITE TRUCK CIRCULATION VIA DRIVEWAY 2

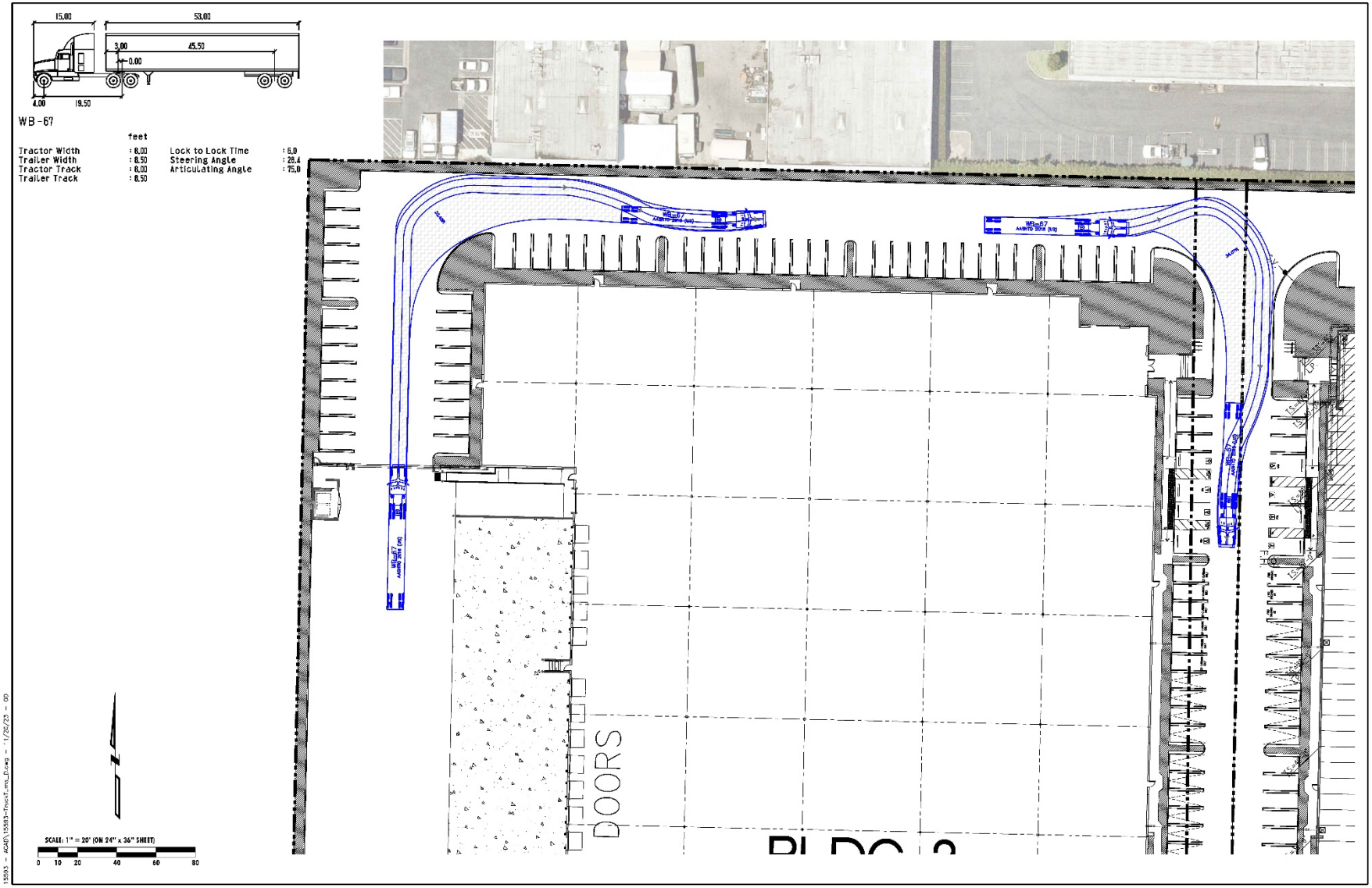


EXHIBIT 1-10: LOADING DOCK TRUCK CIRCULATION

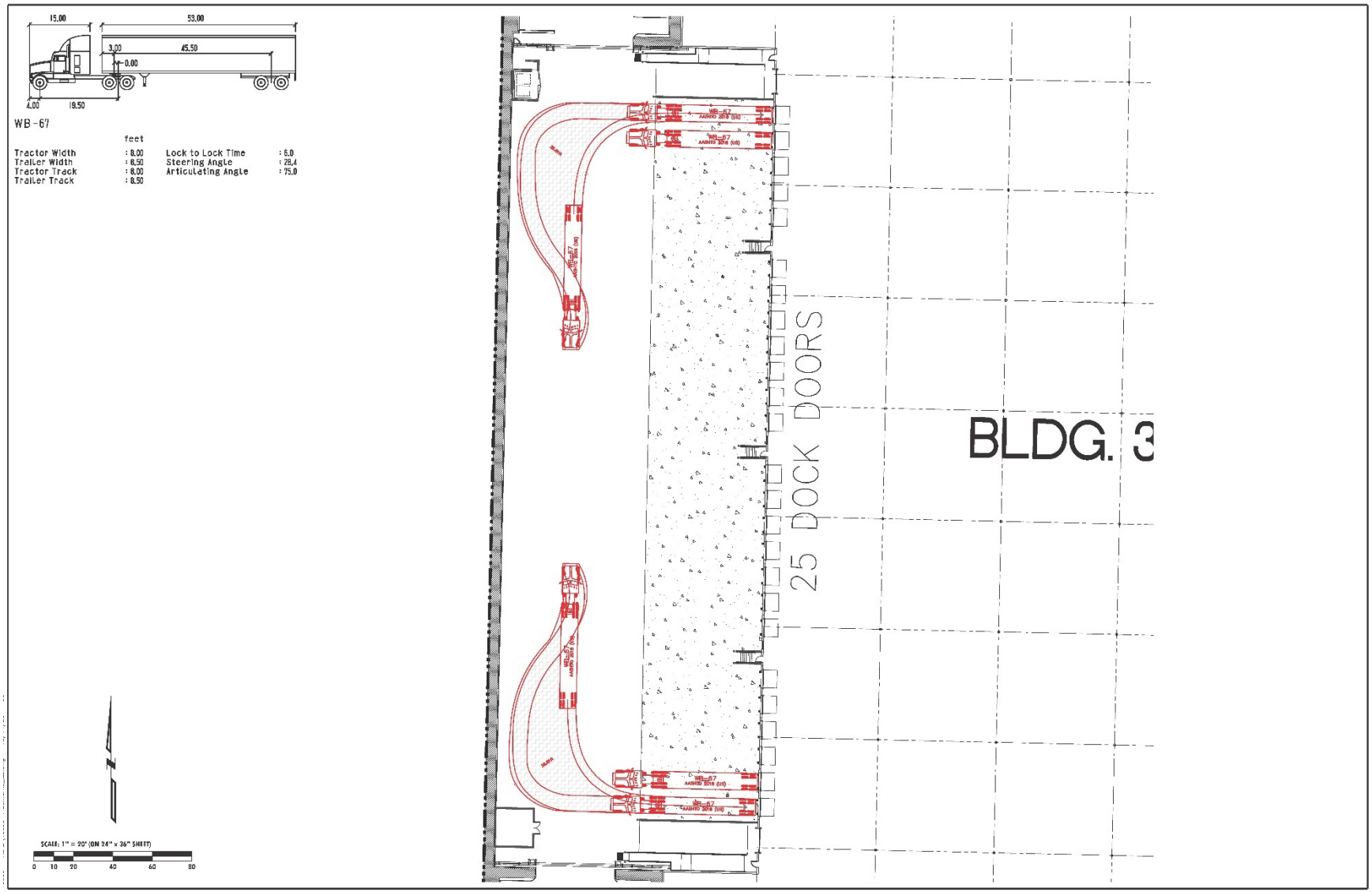
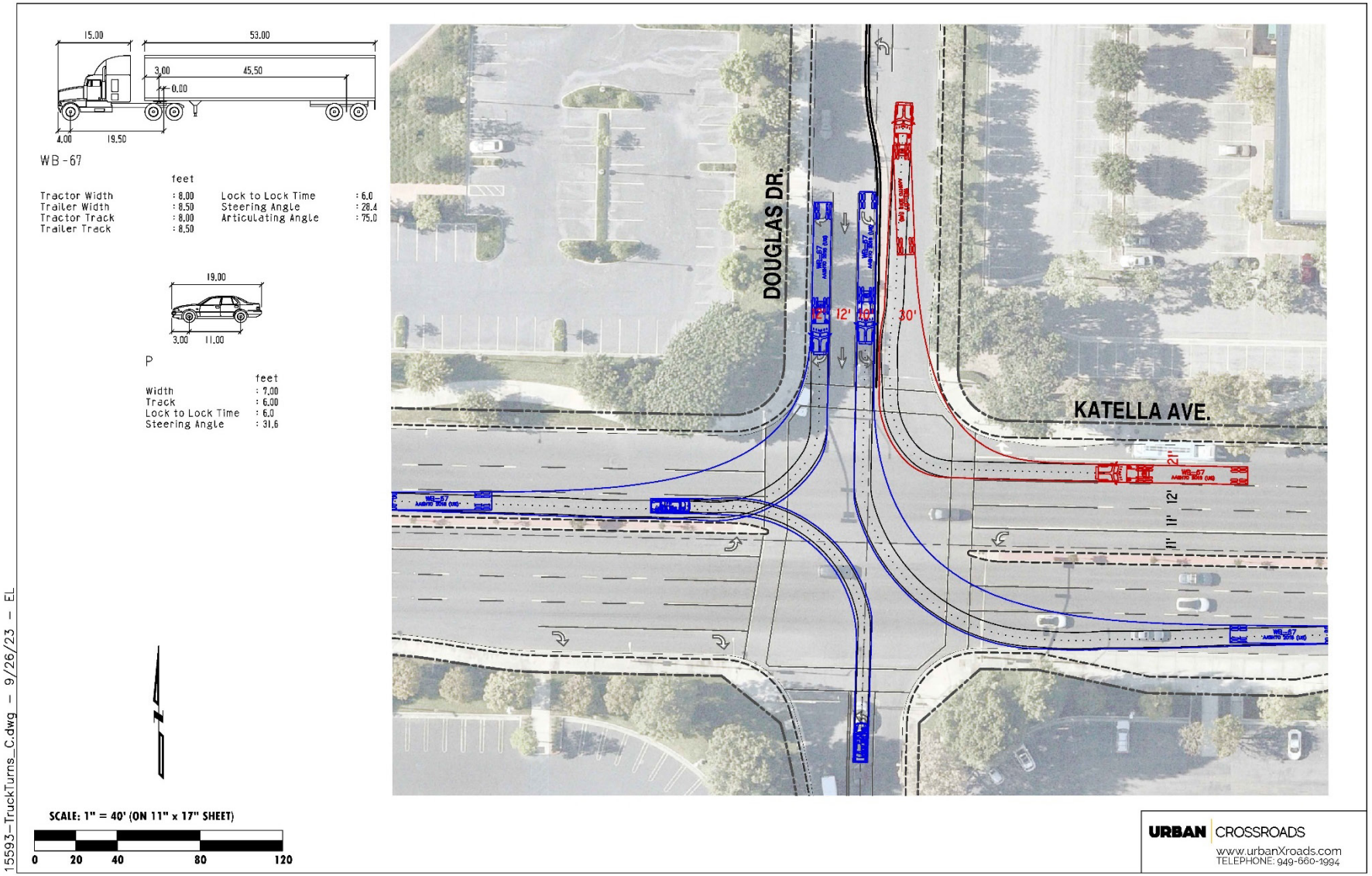
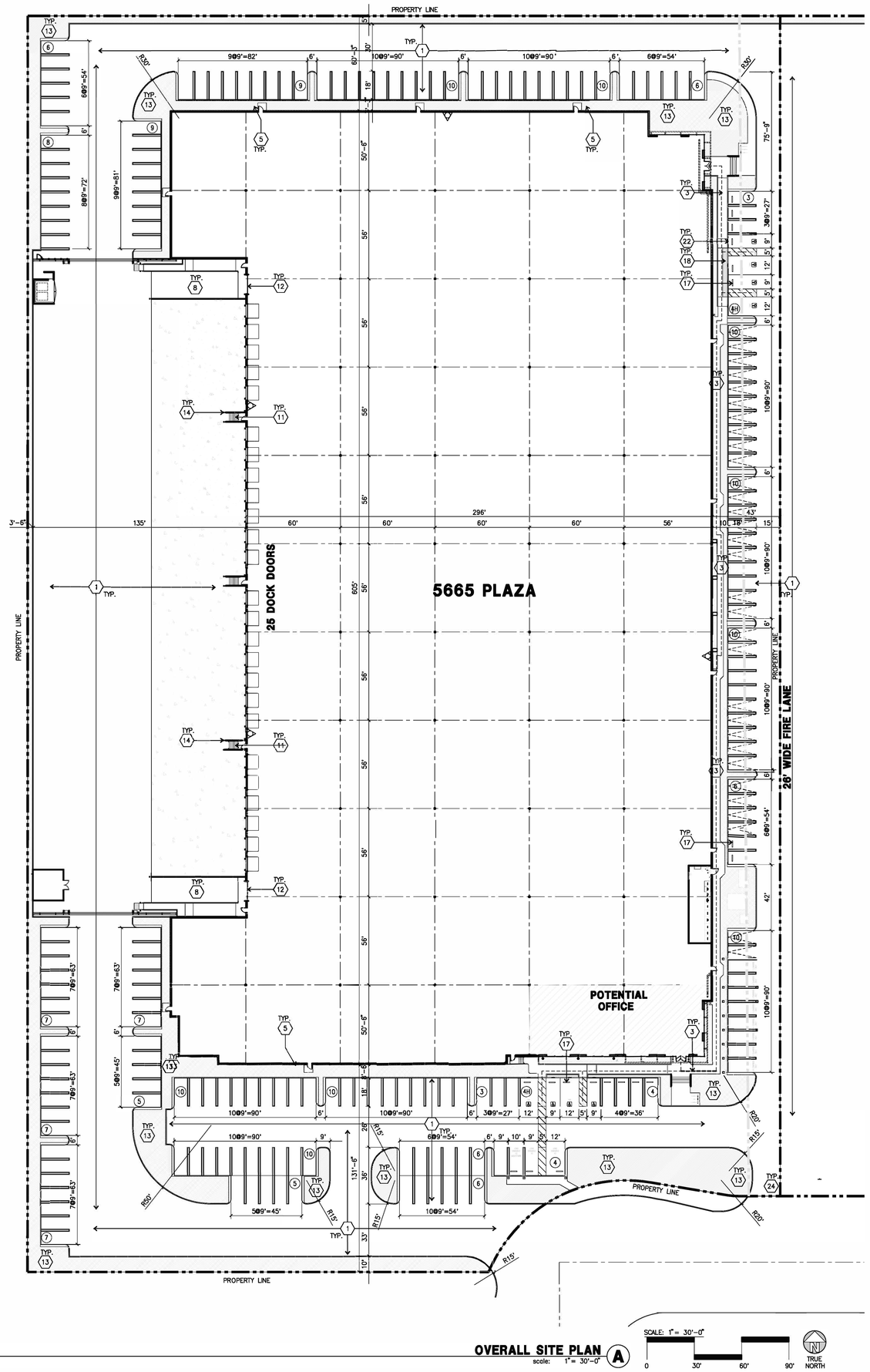


EXHIBIT 1-11: TRUCK ACCESS AT DOUGLAS DR./WARLAND DR. & KATELLA AV.



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OVERALL SITE PLAN (A) scale: 1" = 30'-0"

PROPERTY OWNER

GLC CYPRESS LLC
3333 MICHELSON DRIVE, SUITE 1050
IRVINE, CA 92612.
949-407-0100
BLAIR.DAHL@GOODMAN.COM

ADDRESS OF THE PROPERTY

5665 PLAZA DRIVE, CYPRESS, CA

ASSESSOR'S PARCEL NUMBER

241-101-25

LEGAL DESCRIPTION

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. 20000045370 4, OFFICIAL RECORDS.

APN: 241-101-25

ZONING ORDINANCE FOR CITY

MCDONNELL CENTER AMENDED SPECIFIC PLAN

APPLICANT

GLC CYPRESS LLC
3333 MICHELSON DRIVE, SUITE 1050
IRVINE, CA 92612.
949-407-0100
BLAIR.DAHL@GOODMAN.COM

APPLICANT'S REPRESENTATIVE

HPA INC.
18831 BARDEEN AVE. STE#100
IRVINE, CA 92612
TEL. NO.: (949) 862-2161
CONTACT: ANDY WIYANTO

PROJECT DATA

	5665 PLAZA
SITE AREA	
In s.f.	371,729 s.f.
In acres	8.53 ac
BUILDING AREA	
Office 1st Floor	5,184 s.f.
Office 2nd Floor	5,149 s.f.
Warehouse	181,061 s.f.
TOTAL	191,394 s.f.
COVERAGE	51.5%
AUTO PARKING REQUIRED	
Office: 1/250 s.f.	42 stalls
Warehousing	
1st 20,000 s.f. (2/1,000)	40 stalls
2nd 20,000 s.f. (1/2,000)	10 stalls
Remaining 141,061 s.f. (1/4,000)	36 stalls
TOTAL	128 stalls
AUTO PARKING PROVIDED	
Standard (9' x 18')	156 stalls
Standard Accessible Parking (9' x 18')	4 stalls
Van Accessible Parking (12' x 18')	4 stalls
EVCS (9'x18')	31 stalls
EVSE (9'x18')	8 stalls
EVSE Standard Accessible (9'x18')	1 stalls
EVSE Van Accessible (12'x18')	1 stalls
EVSE Ambulatory (10'x18')	1 stalls
	206 stalls
ZONING ORDINANCE FOR CITY	
McDonnell Center Amended SP (PA-1)	
MAXIMUM BUILDING HEIGHT ALLOWED	
Height - 99'	
MAXIMUM FLOOR AREA RATIO	
FAR - 70%	
SETBACKS	
Building	
Front - 30'	
Rear - 5'	

SITE PLAN KEYNOTES

1. HEAVY BROOM FINISH CONCRETE PAVEMENT
2. FUTURE POLE SIGN TBD.
3. CONCRETE WALKWAY, MEDIUM BROOM FINISH
4. 14'-6" HIGH CONCRETE TILT UP SCREEN WALL WITH 16'-0" HIGH PILASTER.
5. 5'-6"X5'-6"X4" THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH. PROVIDE WALK TO PUBLIC WAY OR DRIVE WAY AS REQ. BY CITY INSPECTOR.
6. PROPOSE TRANSORMER LOCATION.
7. 8'-0" HIGH METAL GATES W/ KNOX-BOX PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY. CONTRACTOR TO DESIGN & DETAIL GATES. DRAWINGS AND CALCULATIONS PRIOR TO FABRICATION. PROVIDE CONDUIT FOR FUTURE.
8. CONCRETE RAMP.
9. BIKE RACK TYPICAL.
10. FIRE HYDRANT W/ CONC. FILLED STEEL GUARD POST
11. EXTERIOR CONCRETE STAIR.
12. 12'W X 14'H' OVERHEAD DOOR @ DRIVE THRU.
13. ALL LANDSCAPE AREAS INDICATED BY SHADING
14. CONC. FILLED GUARD POST "6 DIA. U.N.O. 42" H,
15. ENHANCED HARDSCAPE – PAVING FINISH A (VEHICULAR)
    1. SEE CIVIL PLANS WHERE CONCRETE CURBS OCCUR. BANDS TO BE SEPARATED FROM CURB WITH EXPANSION JOINT.
    2. PERIMETER BAND WITH TOOLED JOINTS"
    3. INTERIOR ACCENT PAVING
    3.1. PROVIDE TOOLED CONTROL JOINTS AT 48" O.C, AT 45 DEGREES EACH DIRECTION.
    3.2. CENTER OVERALL PATTERN WITHIN PERIMETER BAND SUCH THAT THERE ARE NOT SMALL TRIANGLE PIECES WITH SIDES LESS THAN 3" LONG.
16. TRASH COMPACTOR PROVIDED BY OWNER
17. PRE-CAST CONC. WHEEL STOP.
18. TRUNCATED DOME.
19. GRADE LEVEL EXIT DOOR CONNECTED TO PATH OF TRAVEL
20. 8'-0" HIGH BLACK PAINTED METAL TUBULAR FENCE
21. ACCESSIBLE ENTRY SIGN.
22. ACCESSIBLE PARKING STALL SIGN
23. TRASH ENCLOSURE
24. ENHANCED CONCRETE PAVING
25. PAINTING STRIPS
26. EMPLOYEE PATIO BREAK AREA
27. 10'-0" HIGH CONCRETE TILT UP SCREEN WALL

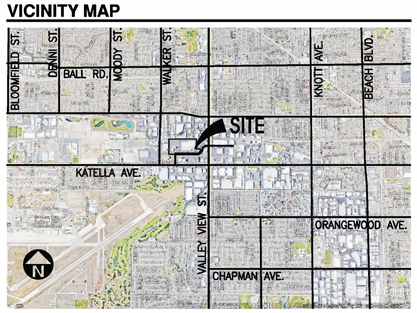
SITE PLAN GENERAL NOTES

1. ALL LIGHTING SHALL CONFORM WITH MUNICIPAL STANDARDS.
2. SEE CIVIL AND STRUCTURAL FOR SITE CONCRETE.
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. REFER TO CIVIL PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES. DETAILS ON SHEET AD.1 ARE MINIMUM STANDARDS.
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM.
6. REFER TO CIVIL DWGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. REFER TO CIVIL DRAWINGS.
8. CONTRACTOR TO REFER TO CIVIL DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
9. REFER TO CIVIL DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' EA. WAY. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4". FINISH TO BE A MEDIUM BROOM FINISH U.N.O.
11. ALL SIGNAGE SHALL CONFORM WITH THE MUNICIPAL STANDARD.
12. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT.
13. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
14. PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
15. SITE PLAN SHALL MEET ALL ENGINEERING AND NPDES REQUIREMENT.
16. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
17. NOT USED.
18. ALL VERTICAL MOUNTING POLES OF CHAIN LINK FENCING SHALL BE CAPPED.
19. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB

SITE PLAN GENERAL NOTES

- CONCRETE PAVING – RE: CIVIL DRAWINGS THICKNESS
- STANDARD PARKING STALL 9' X 18'
- ACCESSIBLE PARKING STALL, 9'X18+5'W ACCESSIBLE AISLE
- VAN ACCESSIBLE 12'X18'+5'W ACCESSIBLE AISLE
- EV PARKING
- CLEAN AIR/VANPOOL/EV (PROVIDE CONDUIT FOR FUTURE EV CHARGING) STALL (9' X 18')
- EV AMBULATORY PARKING STALL (10' X 18')
- LIGHT STANDARD
- 26' WIDE FIRE LANE. PROVIDE RED CURBS AND SIGNAGE PER FIRE DEPT REQUIREMENT
- FIRE HYDRANT– APPROXIMATE LOCATION

VICINITY MAP



HPA architecture 43 Years

hpa, inc.
18831 bardeen avenue, - ste. #100
irvine, ca
92612
tel: 949•863•1770
fax: 949•863•0851
email: hpa@hparchs.com

LICENSED ARCHITECT YOUNG NAM C-29451 3-31-25 RENEWAL DATE STATE OF CALIFORNIA

Owner:

Goodman

Project:

5665 PLAZA DRIVE
CYPRESS, CA 90630

Consultants:

CIVIL	PBLA Engineering, Inc.
STRUCTURAL	HSA & Associates
MECHANICAL	Air Control System
PLUMBING	ACI Plumbing
ELECTRICAL	Gregg electric
LANDSCAPE	RLA
FIRE PROTECTION	JM Carden Sprinkler, Inc
SOILS ENGINEER	G3 SOIL WORKS

Title: OVERALL SITE PLAN

Project Number:	21196
Drawn by:	AW/EM
Date:	01/08/24
Revision:	

Sheet:

3-DAB-A1.1



ONSITE PLANT SCHEDULE

TREES

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE / FORM	HT. X SPRD. X CAL. (MIN.)	WATER USE	DESCRIPTION
	LAGERSTROEMIA FAUERI 'TUSCARORA'	TUSCARORA CRAPE MYRTLE	24" BOX STD.	8'H X 5'W X 4"C	M	FLOWERING TREE
	LOPHOSTEMON CONFERTUS	BRISBANE BOX	24" BOX STD.	8'H X 5'W	M	EVERGREEN CANOPY
	`TIPUANA TIPU	TIPU TREE	36" BOX STD.	14' H X 6'W	L	SEMIDECIDUOUS BROAD CANOPY

SHRUBS, GRASSES, & GROUNDCOVERS

SYMBOL	KEY	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WATER USE	DESCRIPTION
	AGA VIL	AGAVE VILMORINIANA	OCTOPUS AGAVE	15 GAL.	60" O.C.	L	ACCENT SUCCULENT
	ALO BE	ALOE 'BLUE ELF'	BLUE ELF ALOE	1 GAL.	24" O.C.	L	ACCENT SUCCULENT
	CAL LJ	CALLISTEMON 'LITTLE JOHN'	LITTLE JOHN BOTTLE BRUSH	5 GAL.	36" O.C.	L	MIDGROUND FLOWERING SHRUB
	CAR GC	CARISSA M. 'GREEN CARPET'	DWARF NATAL PLUM	1 GAL.	30" O.C.	L	EVERGREEN LOW SHRUB
	CAR DIV	CAREX DIVULSA	BERKELEY SEDGE	1 GAL.	24" O.C.	L	ORNAMENTAL GRASS
	DIA LR	DIANELLA 'LITTLE REV'	LITTLE REV FLAX LILY	1 GAL.	24" O.C.	L	UPRIGHT ACCENT
	DIA VAR	DIANELLA T. 'VARIEGATA'	VARIEGATED FLAX LILY	5 GAL.	36" O.C.	M	UPRIGHT ACCENT
	FES MAI	FESTUCA MAIREI	ATLAS FESCUE	1 GAL.	24" O.C.	L	ORNAMENTAL GRASS
	JUN PAT	JUNCUS PATENS	CALIFORNIA GRAY RUSH	1 GAL.	24" O.C.	L	MODULAR WETLAND PLANT
	LAN NG	LANTANA 'NEW GOLD'	NEW GOLD LANTANA	5 GAL.	36" O.C.	VL	FLOWERING LOW SHRUB
	MUH ET	MUHLENBERGIA 'EL TORO'	BULL RUSH	1 GAL.	36" O.C.	L	ORNAMENTAL GRASS
	OLE MON	OLEA 'MONTRA'	LITTLE OLLIE	5 GAL.	48" O.C.	L	LARGE SHRUB
	WES WG	WESTRINGIA 'WYNYABBIE GEM'	COAST ROSEMARY	5 GAL.	36" O.C.	L	EVERGREEN HEDGE
	CAL HAE	CALLIANDRA HAEMATOCEPHALA	RED POWDER PUFF	15 GAL.	15' O.C.	M	FLOWERING VINE

WATER USE KEY:
VL = VERY LOW WATER USE, L = LOW WATER USE, M = MODERATE WATER USE, H = HIGH WATER USE. WATER USE STATED IS PER 'WATER USE CLASSIFICATION OF LANDSCAPE SPECIES' (ALSO REFERRED TO AS WUCOLS IV) FOR THE CITY OF CYPRESS, CA.

LEGEND

1. ENHANCED PAVING AT BUILDING ENTRY
2. CONCRETE WALKWAYS
3. PROPOSED ACCENT TREES
4. PROPOSED PARKING TREES
5. PROPOSED SCREEN TREES
6. DROUGHT TOLERANT LANDSCAPE

EXISTING PLANT SCHEDULE

TREES

SYMBOL	BOTANICAL NAME	COMMON NAME
	PLATANUS ACERFOLIA	LONDON PLANE
	ERYTHRINA CAFFRA	CORAL
	LOPHOSTEMON CONFERTUS	BRISBANE BOX

NOTE: THE LETTER (E) NEXT TO A TREE SYMBOL INDICATES AN EXISTING TREE TO BE PROTECTED IN PLACE. THE LETTER (R) INDICATES AN EXISTING TREE TO BE REMOVED FROM SITE.

EXISTING TREE DISPOSITION

EXISTING TREES REMOVED	157
NEW TREES PROPOSED	173

HPA architecture
RLA
8841 RESEARCH DR
SUITE 200
IRVINE • CA 92618
949.387.1323
RIDGELA.COM

Preliminary Landscape Plan

L1.1

0 20 40 80 120

Goodman

18831 Bardeen Ave. - Ste. #100
Irvine, CA 92612
(949) 863-1770
www.hparchs.com

Goodman Commerce Center Cypress

5665 Plaza Dr. Cypress, CA

JANUARY 12, 2024 / Job #23072



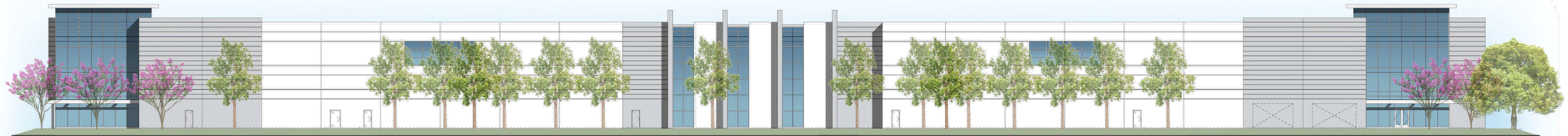
North Elevation — Scale: N.T.S



West Elevation — Scale: N.T.S



South Elevation — Scale: N.T.S



East Elevation — Scale: N.T.S

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Preliminary Landscape Elevations

L2.1

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SAN LUIS OBISPO

MEMORANDUM

DATE: December 15, 2023

TO: Alicia Velasco, City of Cypress

FROM: Ambarish Mukherjee, P.E., AICP

SUBJECT: 5665 Plaza Drive Project – Vehicle Miles Traveled (VMT) Analysis

LSA has prepared this memorandum documenting the methodology and findings of a vehicle miles traveled (VMT) analysis for the 5665 Plaza Drive Project (project) in the City of Cypress (City), California.

BACKGROUND

On December 28, 2018, the California Office of Administrative Law cleared the revised California Environmental Quality Act (CEQA) guidelines for use. Among the changes to the guidelines was the removal of vehicle delay and level of service (LOS) from consideration under CEQA. With the adopted guidelines, transportation impacts are to be evaluated based on a project's effect on VMT.

PROJECT DESCRIPTION

It is LSA's understanding that GLC Cypress LLC (Applicant) is proposing to demolish an approximately 150,626-square-foot (sf) office building (Assessor's Parcel Number 241-101-26) located at 5665 Plaza Drive and construct a 191,394 square foot warehouse building. The existing warehouse/office building is currently vacant and generating only nominal vehicle trips.

ANALYSIS METRICS

The City is yet to adopt the Senate Bill 743 (SB 743) guidelines; therefore, the VMT analysis has been based upon the methodology and significant threshold criteria identified in the Governor's Office of Planning and Research (OPR) *Technical Advisory* (TA), dated December 2018.

The project includes industrial land uses only. The OPR TA does not specifically recommend any VMT metric or threshold for industrial uses. However, since the land use is non-residential and could not be classified as retail land use, VMT-per-employee metric was used for purposes of evaluating the project.

Based on the OPR TA recommendations, the threshold for determining VMT impacts has been considered as 15 percent below the region's baseline VMT per capita for residential projects, and 15 percent below the region's baseline VMT per employee for non-residential/non-retail projects.

As per the OPR TA, a region should be defined based on where the majority of the project trips are contained. As such, the majority of project trips are estimated to start or end within the region defined for VMT analysis purposes. Typically, it is the county boundary within which a majority of those trips are contained. While the city boundary can also be considered as the region for residential uses, given that the project land use is non-residential and based on the understanding of the local trip patterns, it was determined that the entire Orange County would be the most appropriate region for the project for purposes of VMT analysis. As such, as recommended in the OPR Guidelines, if the project VMT per employee is greater than 85 percent of the existing countywide VMT per employee, the project constitutes a significant VMT impact.

METHODOLOGY

The OPR TA provides multiple screening criteria for land use projects. One of the screening criteria is a daily trip threshold. If the land use project generates less than 110 daily trips, the project can be screened from a detailed VMT analysis. The project includes demolition of existing office land uses and replaces them with industrial land uses. A trip generation analysis conducted by the traffic consultant looked at the difference in daily trips between the existing land uses and proposed land uses. It was observed that the proposed land uses produce 196 more daily trips than the existing office land uses. Since the difference in daily trips between the proposed and existing uses is greater than 110, it was concluded that a detailed VMT analysis using the regional travel demand model would be required to evaluate the project VMT impact. The Orange County Transportation Analysis Model (OCTAM) was used to determine the VMT impact of the project.

Project Traffic Analysis Zone Update

The first step in the preparation of this analysis was to update the Traffic Analysis Zones (TAZs) in the model that include the project area. The project needs to be isolated in a separate TAZ to estimate/determine the project VMT. OCTAM doesn't include the capability to split/add new TAZs, so a TAZ was borrowed for the project. That TAZ was used to estimate the project VMT and efficiency metric (i.e., VMT per employee).

OCTAM is a socioeconomic data-based model, hence project land uses were converted into model employment using land use-to-employment conversion factors. The project socioeconomic data were added to the project TAZ for the model run.

VMT Analysis

A baseline model run was conducted using socioeconomic data for the project and project location TAZs (as indicated above). No circulation/network modifications were identified for inclusion in the model network. The outputs from this updated model run were used to calculate the VMT per employee for the project.

As indicated before, VMT per employee metric is used to evaluate the project land use. The proposed project would constitute a significant impact if the project VMT metric is greater than 85 percent of the regional existing VMT metric. Hence the proposed project would constitute a significant impact if project VMT per employee is greater than 85 percent of the Orange County VMT

per employee (threshold). As can be seen from Table A, existing project VMT per employee is lower than the significant threshold; therefore, the project doesn't constitute any significant VMT impact.

Table A: Baseline Project and Regional VMT Per Employee Comparison

2016	5665 Plaza Drive (project)	Entire Orange County [1]	Threshold [2]	% Difference	Significant Impact
VMT per employee	20.3	24.1	20.5	-1%	No

Source: Compiled by LSA (2023).

[1] Obtained from Final Draft Guidelines For Evaluating Vehicle Miles Traveled Under CEQA for the County of Orange, September 17, 2020.

[2] 85% of the regional average (24.1*0.85=20.5) Baseline. Base year of the OCTAM model is 2016.

OCTAM = Orange County Transportation Analysis Model

VMT = vehicle miles traveled

CONCLUSIONS

Based on the recommendations from the OPR TA, the proposed 5665 Plaza Drive warehouse project was evaluated using VMT per employee metric. The project is not eligible to be screened out of a VMT analysis and therefore, a detailed VMT analysis was conducted for the project using the OCTAM model and using Orange County as the region. Based on the significance threshold criteria determined within the OPR TA, the project VMT per employee does not exceed the threshold. Therefore, the project will have a less than significant transportation impact.

Attachment: Vehicle Miles Traveled (VMT) Analysis Worksheet

LSA

Appendix A - VMT Calculation Worksheet

5665 Plaza Drive, City of Cypress - VMT Analysis

2016	5665 Plaza Drive (project)	Entire Orange County *	Threshold **
Total Employment	93	1,710,147	
Homebased Work (HBW) VMT	1,886	41,174,971	
HBW VMT per employee	**20.3**	**24.1**	**20.5**

**: Obtained from Final Draft Guidelines For Evaluating Vehicle Miles Traveled Under CEQA for the County of Orange, September 17, 2020*

***: 85% of the regional average (24.1*0.85=20.5)*

MEMORANDUM

URBAN | CROSSROADS



DATE: February 20, 2024
TO: Alicia Velasco, City of Cypress
FROM: Charlene So, Urban Crossroads, Inc.
JOB NO: 15593-06 TG Memo

GOODMAN COMMERCE CENTER TRIP GENERATION ASSESSMENT

Urban Crossroads, Inc. is pleased to provide the following Trip Generation Assessment that has been prepared for the Goodman Commerce Center development (referred to as Project), which is located at 5665 Plaza Drive in the City of Cypress. Specifically, the following trip generation assessment compares the Project to the existing 150,626 square foot office building assuming 100% occupancy.

BACKGROUND

For the purposes of the Goodman Commerce Center Traffic Analysis (dated January 11, 2024. Referred to as the 2024 Traffic Study), the existing office building was approximately 41% occupied, but to not overstate existing credit for the office use and conduct a conservative analysis for the 2024 Traffic Study, it was assumed that only 25% of the building space was occupied to account for the existing tenants that could be underutilizing their space. However, current entitlements for the office building would allow for 100% occupancy of the existing building without any further discretionary action by the City. As such, the following trip generation assessment compares the proposed Project (as evaluated in the 2024 Traffic Study) to 100% occupancy of the existing 150,626 square foot office building.

PROJECT TRIP GENERATION

Table 1 summarizes the Project trip generation as evaluated in the 2024 Traffic Study. The proposed Project is anticipated to generate 406 two-way trips per day with 21 AM peak hour trips and 24 PM peak hour trips (actual vehicles). Intersection operations analysis for an industrial project must be evaluated using the passenger car equivalent (PCE) trip generation consistent with the City's Guidelines. As such, the Project's trip generation in PCE is also summarized in Table 1. The Project is anticipated to generate 604 two-way PCE trips per day with 29 PCE AM peak hour trips and 32 PCE PM peak hour trips.

TABLE 1: PROJECT TRIP GENERATION

			AM Peak Hour			PM Peak Hour			
Land Use	Quantity	Units[1]	In	Out	Total	In	Out	Total	Daily
Actual Vehicles:									
High-Cube Cold Storage Warehouse	191.394	TSF							
Passenger Cars:			15	1	16	4	14	18	262
2-axle Trucks:			1	1	2	1	1	2	50
3-axle Trucks:			0	0	0	0	0	0	16
4+-axle Trucks:			1	2	3	2	2	4	78
Total Truck Trips (Actual Vehicles):			2	3	5	3	3	6	144
Total Trips (Actual Vehicles)[2]			**17**	**4**	**21**	**7**	**17**	**24**	**406**
Passenger Car Equivalent (PCE):									
High-Cube Cold Storage Warehouse	191.394	TSF							
Passenger Cars:			15	1	16	4	14	18	262
2-axle Trucks:			1	2	3	1	2	3	76
3-axle Trucks:			0	1	1	1	0	1	32
4+-axle Trucks:			3	6	9	5	5	10	234
Total Truck Trips (PCE):			4	9	13	7	7	14	342
Total Trips (PCE)[2]			**19**	**10**	**29**	**11**	**21**	**32**	**604**

Note: Due to rounding, some of the numbers reflected in the table to not reflect actual calculated amounts.

[1] TSF = Thousand Square Feet

[2] Total = Passenger Cars + Trucks

EXISTING TRIP GENERATION

In an effort to understand the existing traffic associated with 100% occupancy of the existing office use, the trip generation rates used for this assessment are based upon information collected by the Institute of Transportation Engineers (ITE) as provided in their Trip Generation Manual (11th Edition, 2021). General Office (ITE Land Use Code 710) land use category has been used to calculate the trip generation for the existing 150,626 square feet of available office space. The trip generation summary illustrating daily, and peak hour trip generation estimates for the existing uses are shown in Table 2 along with the applicable trip generation rates. As shown in Table 2, 150,626 square feet of general office use generates a total of 1,634 two-way trips per day with 228 AM peak hour trips and 217 PM peak hour trips.

TABLE 2: EXISTING TRIP GENERATION

Land Use[1]	Units[2]	ITE LU Code	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
General Office (based on average rates)	TSF	710	1.34	0.18	1.52	0.24	1.20	1.44	10.84

Land Use	Quantity	Units[2]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
General Office[3]	150.626	TSF	201	27	228	37	180	217	1,634

[1] Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Eleventh Edition (2021).

[2] TSF = Thousand Square Feet

[3] 100% occupancy of the 150,626 square foot office building.

TRIP GENERATION COMPARISON

Table 3 shows the trip generation comparison between the proposed Project uses and the existing office use (assuming 100% occupancy). The resulting net change in trips is identified in Table 3. As shown, the proposed Project is anticipated to generate 1,030 fewer two-way PCE trips per day with 199 fewer PCE AM peak hour trips and 185 fewer PCE PM peak hour trips as compared to the existing office use (resulting in a net reduction).

TABLE 3: TRIP GENERATION COMPARISON

Land Use	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Proposed Project							
Passenger Cars:	15	1	16	4	14	18	262
Total Truck Trips (PCE):	4	9	13	7	7	14	342
Total Trips (PCE)	**19**	**10**	**29**	**11**	**21**	**32**	**604**
Existing Use: General Office							
Passenger Cars:	201	27	228	37	180	217	1,634
Total Truck Trips (PCE):	0	0	0	0	0	0	0
Total Trips (PCE)	**201**	**27**	**228**	**37**	**180**	**217**	**1,634**
Variance							
Passenger Cars:	-186	-26	-212	-33	-166	-199	-1,372
Total Truck Trips (PCE):	4	9	13	7	7	14	342
Total Trips (PCE)	**-182**	**-17**	**-199**	**-26**	**-159**	**-185**	**-1,030**

If you have any questions or comments, I can be reached at cso@urbanxroads.com.

URBAN | CROSSROADS

GOODMAN COMMERCE CENTER

TRAFFIC ANALYSIS

PREPARED BY: Charlene So | cso@urbanxroads.com
Aric Evatt | aevatt@urbanxroads.com



Reference Number	Agency	Date
15593-03 TA Report	City of Cypress	November 21, 2023

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LIST OF ABBREVIATED TERMS

(1)	Reference
ADT	Average Daily Traffic
CAMUTCD	California Manual on Uniform Traffic Control Devices
Caltrans	California Department of Transportation
CMP	Congestion Management Program
E+P	Existing plus Project
HCM	Highway Capacity Manual
ICU	Intersection Capacity Utilization
ITE	Institute of Transportation Engineers
LOS	Level of Service
OCTA	Orange County Transit Authority
PCE	Passenger Car Equivalent
PHF	Peak Hour Factor
Project	Goodman Commerce Center
SCAQMD	South Coast Air Quality Management District
TA	Traffic Analysis
v/c	Volume to Capacity
vphgpl	Vehicles per Hour Green per Lane

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1 INTRODUCTION

This report presents the results of the Traffic Analysis (TA) for Goodman Commerce Center development ("Project"), which is located at 5665 Plaza Drive (Assessor's Parcel Number: 241-101-26) in the City of Cypress, as shown on Exhibit 1-1. The purpose of this TA is to evaluate the potential circulation system deficiencies that may result from the development of the proposed Project, and where necessary recommend improvements to achieve acceptable operations consistent with the City's General Plan level of service goals and policies. This TA has been prepared in accordance with the City's Transportation Operational Assessment (Level-Of-Service Traffic Study) Guidelines (dated April 2023) and through consultation with City of Cypress staff during the scoping process. (1) The Project traffic study scoping agreement is provided in Appendix 1.1 of this TA, which has been reviewed and approved by the City of Cypress.

1.1 SUMMARY OF FINDINGS

The Project is to construct the following improvements as design features in conjunction with development of the site:

- Project to construct the site frontage improvements needed to accommodate site access along Plaza Drive/Douglas Drive.
- Project to install stop controls for all egress traffic from each Project driveway. All driveways along Plaza Drive/Douglas Drive will accommodate full access (no turn restrictions).

Additional details and intersection lane geometrics are provided in Section 1.6 *Recommendations* of this report. The Project is not anticipated to require the construction of any off-site improvements and would also contribute to improvement needs identified at off-site intersections for future cumulative traffic conditions.

1.2 PROJECT OVERVIEW

A preliminary site plan for the proposed Project is shown on Exhibit 1-2. The Project includes the development of a 191,394 square foot warehouse building. The TA evaluates 191,394 square feet of high-cube cold storage warehouse use. The proposed Project will replace an existing 150,626 square foot office building. The anticipated Opening Year for the proposed Project is 2025. Access to the site will be accommodated via two driveways at Plaza Drive and Douglas Drive. In order to develop the traffic characteristics of the proposed project, trip-generation statistics published in the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021). (2) The Project is anticipated to generate a total of 406 two-way trips per day with 21 AM peak hour trips and 24 PM peak hour trips (actual vehicles). The assumptions and methods used to estimate the Project's trip generation characteristics are discussed in greater detail in Section 4.1 *Project Trip Generation* of this report.

EXHIBIT 1-1: LOCATION MAP

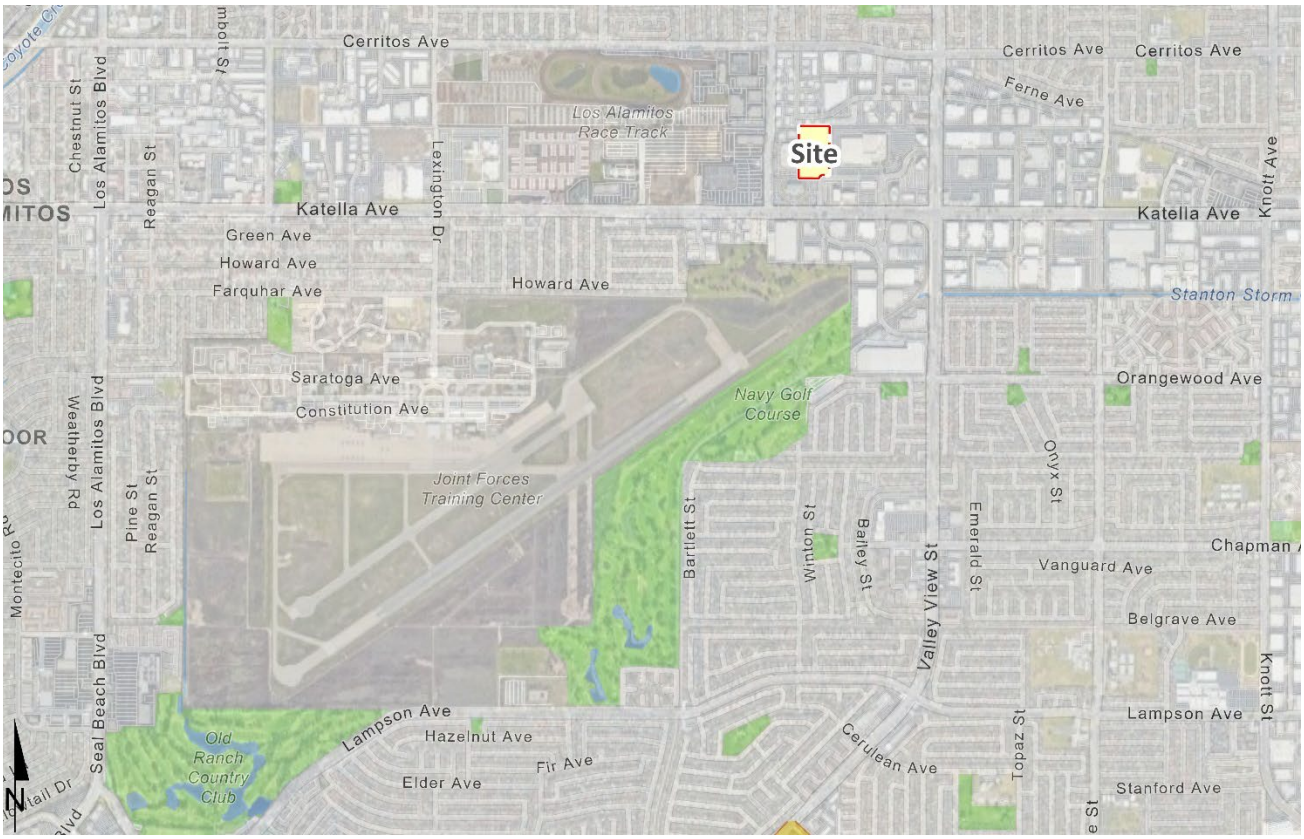
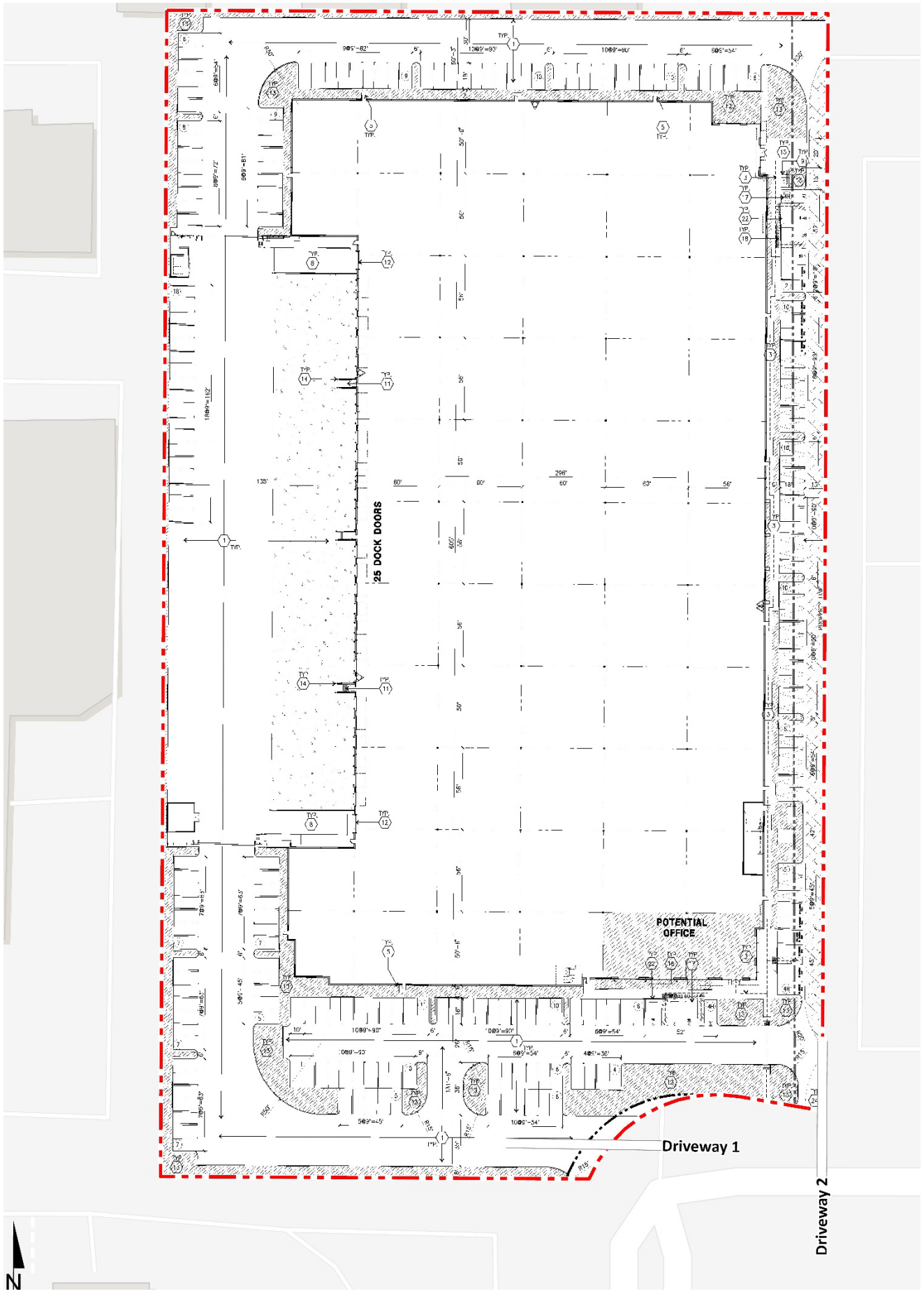


EXHIBIT 1-2: PRELIMINARY SITE PLAN



1.3 ANALYSIS SCENARIOS

For the purposes of this traffic study, potential deficiencies to traffic and circulation have been assessed for each of the following conditions:

- Existing (2023) Conditions
- Existing plus Project (E+P)
- Future Year (2025) Without Project
- Future Year (2025) With Project

1.3.1 EXISTING (2023) CONDITIONS

Information for Existing (2023) conditions is disclosed to represent the baseline traffic conditions as they existed at the time this report was prepared. Traffic volume utilized for the intersection operations analyses are based on 2022 traffic counts in conjunction with the application of a two percent adjustment/growth factor to reflect 2023 traffic conditions. For a detailed discussion on the existing traffic counts, see Section 3.6 *Existing Traffic Counts*.

1.3.2 E+P CONDITIONS

The E+P conditions analysis determines the potential circulation system deficiencies based on a comparison of the E+P traffic conditions to Existing conditions. The roadway network is similar to Existing conditions except for new connections to be constructed by the Project. Cumulative development projects and ambient growth are not included for E+P traffic conditions.

1.3.3 FUTURE YEAR (2025) CONDITIONS

The Future Year (2025) traffic conditions analysis determines the potential near-term cumulative circulation system deficiencies. The roadway network is similar to Existing conditions except for new connections to be constructed by the Project. To account for background traffic growth, an ambient growth factor from Existing (2023) conditions of 4.04% (2 percent per year, compounded over 2 years) is included for Future Year (2025) traffic conditions. Conservatively, this TA estimates the area ambient traffic growth and then adds traffic generated by other known or probable related projects. These related projects are at least in part already accounted for in the assumed ambient growth rates; and some of these related projects may not be implemented and operational within the 2025 Opening Year time frame assumed for the Project. The resulting traffic growth utilized in the TA (ambient growth factor plus traffic generated by related projects) would therefore tend to overstate rather than understate background cumulative traffic deficiencies under 2025 conditions.

1.4 STUDY AREA

To ensure that this TA satisfies the City of Cypress's traffic study requirements, Urban Crossroads, Inc. prepared a Project traffic study scoping package for review by City of Cypress staff prior to the preparation of this report. This agreement provides an outline of the Project study area, trip generation, trip distribution, and analysis methodology. The agreement approved by the City is included in Appendix 1.1 of this TA.

The 4 study area intersections shown on Exhibit 1-3 and listed in Table 1-1 were selected for evaluation in this TA based on consultation with City of Cypress staff. At a minimum, the study area includes intersections where the Project is anticipated to contribute 25 or more peak hour trips per the City's Guidelines. (1) The 25 peak hour trip criterion has been used for the purposes of estimating a potential area of influence (i.e., study area).

TABLE 1-1: INTERSECTION ANALYSIS LOCATIONS

#	Intersection	Jurisdiction	CMP?
1	Douglas Dr./Warland Dr. & Katella Av.	City of Cypress	No
2	Douglas Dr./Dwy. 2 & Dwy. 1/Plaza Dr.	City of Cypress	No
3	Existing Driveway/McDonnell Dr. & Plaza Dr.	City of Cypress	No
4	Valley View St. & Plaza Dr./Chip Av.	City of Cypress	No

The intent of a Congestion Management Program (CMP) is to more directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs that will effectively utilize new transportation funds, alleviate traffic congestion and related deficiencies, and improve air quality. The County of Orange CMP became effective with the passage of Proposition 111 in 1990 and most recently updated in 2021. (3) There are no study area intersections identified as a CMP intersection.

1.5 DEFICIENCIES

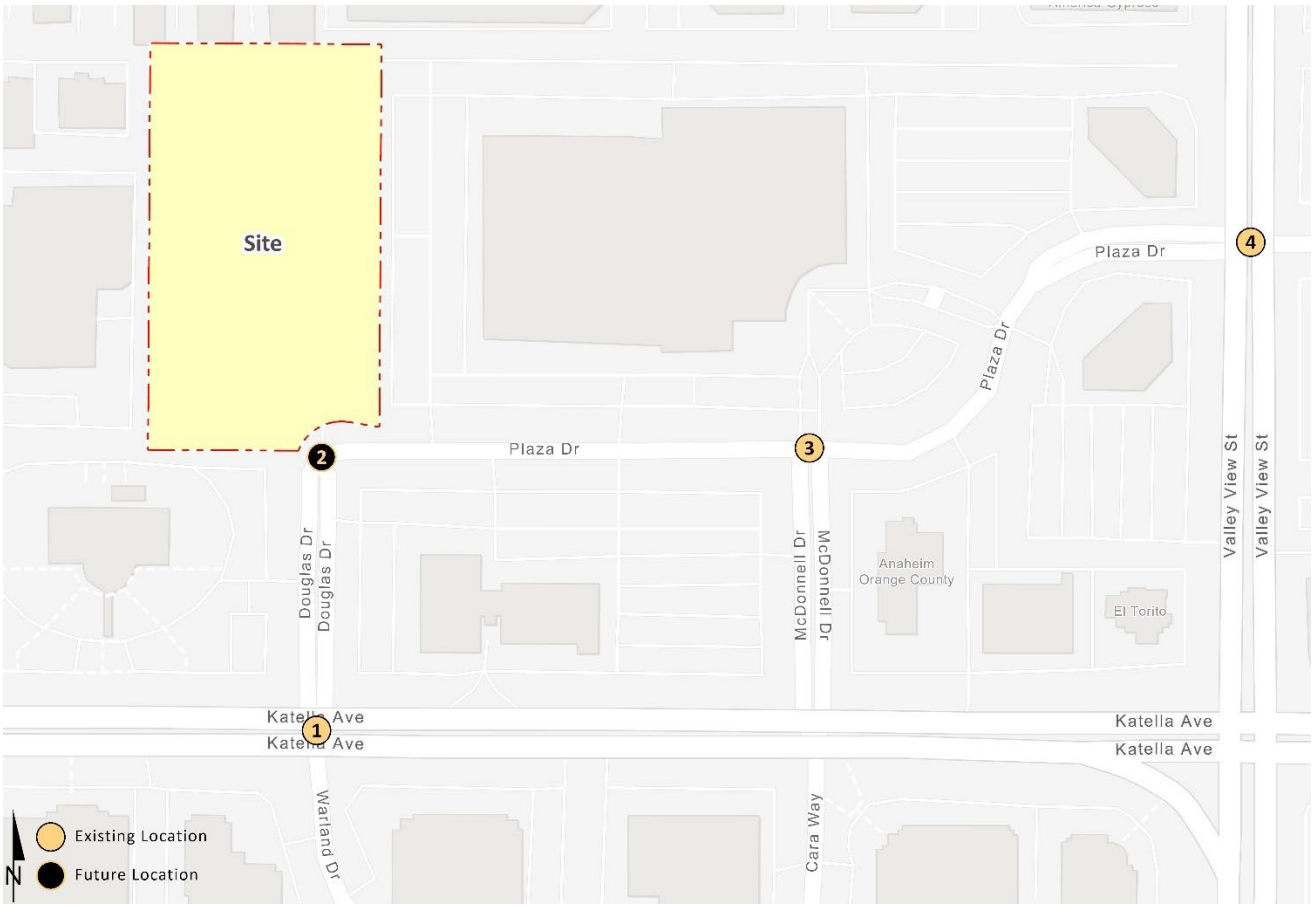
This section provides a summary of deficiencies by analysis scenario. Section 2 *Methodologies* provides information on the methodologies used in the analysis, Section 5 *Existing plus Project Traffic Conditions,* and Section 6 *Future Year (2025) Traffic Conditions* include the detailed analysis. A summary of level of service (LOS) results for all analysis scenarios is presented on Table 1-2.

TABLE 1-2: SUMMARY OF LOS

		Existing		E+P		2025 NP		2025 WP	
#	Intersection	AM	PM	AM	PM	AM	PM	AM	PM
1	Douglas Dr./Warland Dr. & Katella Av.	●	●	●	●	●	●	●	●
2	Douglas Dr./Dwy. 2 & Dwy. 1/Plaza Dr.	●	●	●	●	●	●	●	●
3	Existing Driveway/McDonnell Dr. & Plaza Dr.	●	●	●	●	●	●	●	●
4	Valley View St. & Plaza Dr./Chip Av.	●	●	●	●	●	●	●	●

● = A - D ● = E ● = F

EXHIBIT 1-3: STUDY AREA



1.5.1 EXISTING (2023) CONDITIONS

The study area intersections are currently operating at an acceptable LOS during the peak hours.

1.5.2 E+P CONDITIONS

The study area intersections are anticipated to continue to operate at an acceptable LOS during the peak hours with the addition of Project traffic.

1.5.3 FUTURE YEAR (2025) CONDITIONS

The study area intersections are anticipated to continue to operate at an acceptable LOS under Future Year (2025) Without and With Project traffic conditions.

1.6 RECOMMENDATIONS

The following recommendations are based on the minimum improvements needed to accommodate site access and maintain acceptable peak hour operations for the proposed Project.

Recommendation 1 – Driveway 2/Douglas Drive & Driveway 1/Plaza Drive (#2) – The following improvements are necessary to accommodate site access:

- Project to install a stop control on the southbound approach and eastbound approach (egress Project traffic) to implement an all-way stop-controlled intersection. Driveway 1/Driveway 2 will accommodate site access for passenger cars and trucks and will accommodate full access (no turn restrictions).
- The northwest curb of Driveway 1 should be modified to accommodate a 25-foot curb radius to accommodate the egress of heavy trucks.

Recommendation 2 – Truck Access & Routing Plan – A revised truck access and routing plan should be prepared for the proposed Project identifying the proposed signage that needs to be implemented on-site to direct trucks per the proposed circulation of trucks as noted in this report.

On-site traffic signing and striping should be implemented agreeable with the provisions of the California Manual on Uniform Traffic Control Devices (CA MUTCD) and in conjunction with detailed in the master signing program and construction plans for the Project site.

Sight distance at each project access point should be reviewed with respect to standard Caltrans and City of Cypress sight distance standards at the time of preparation of final grading, landscape, and street improvement plans.

Recommendation 3 – Douglas Drive/Warland Drive & Katella Avenue – Install a new southbound signal head on the northwest corner for southbound approach vehicles in order to display the signal indication should a truck in the southbound lanes obstruct the existing signal heads on the mast arm. The new signal head is proposed to be mounted on the existing signal pole on the northwest corner.

1.7 TRUCK ACCESS

Due to the typical wide turning radius of large trucks, a truck turning template has been overlaid on the site plan at Driveway 1 and Driveway 2 (at the intersection of Douglas Drive and Plaza Drive) which is anticipated to be utilized by heavy trucks in order to determine appropriate curb radii and to verify that trucks will have sufficient space to execute turning maneuvers. A WB-67 truck (53-foot trailer) has been utilized for the purposes of this analysis. Driveway 1 on Douglas Drive is anticipated to accommodate the ingress and egress of heavy trucks as currently designed to and from the east on Plaza Drive and south on Douglas Drive, however, the northwest curb of Driveway 2 should be modified to accommodate a 25-foot curb radius to accommodate the egress of heavy trucks. Ingress and egress of heavy trucks will also be permitted at Driveway 2 on Plaza Drive.

Exhibit 1-4 and Exhibit 1-5 reflect the inbound and outbound truck access at Driveway 1, respectively. Exhibit 1-6 and Exhibit 1-7 reflect the inbound and outbound truck access at Driveway 2, respectively.

Exhibit 1-8 and Exhibit 1-9 show the inbound and outbound on-site circulation of trucks via Driveway 2 around the north side of the building, respectively. Inbound and outbound on-site circulation of trucks via Driveway 1 around the south side of the building was previously shown on Exhibit 1-4 and Exhibit 1-5. On-site signage will be provided to direct trucks per the proposed/allowable circulation. Trucks backing into the dock bay on-site within the truck court for the building is shown on Exhibit 1-10.

EXHIBIT 1-4: INBOUND TRUCK ACCESS AT DRIVEWAY 1

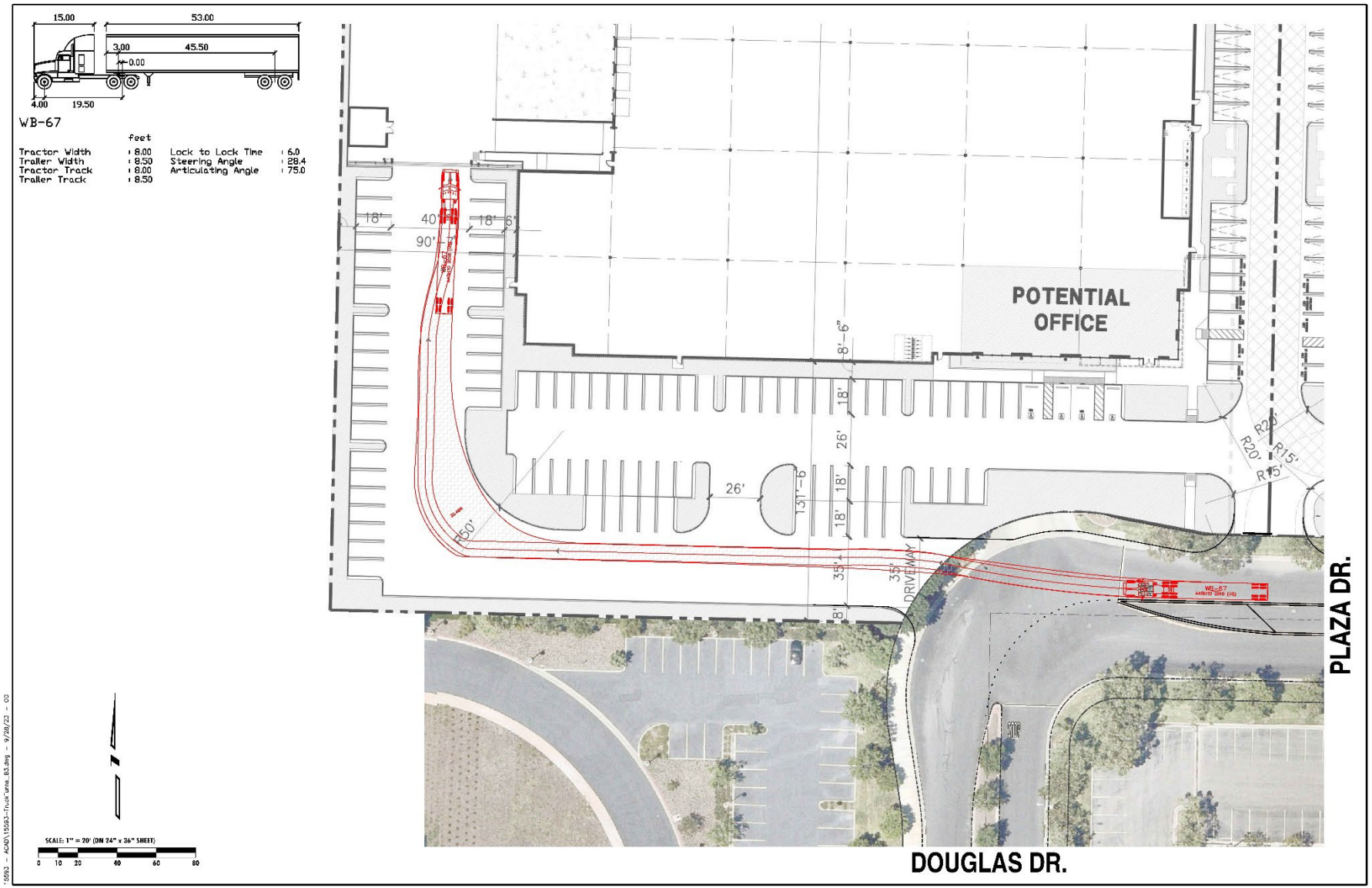


EXHIBIT 1-5: OUTBOUND TRUCK ACCESS AT DRIVEWAY 1

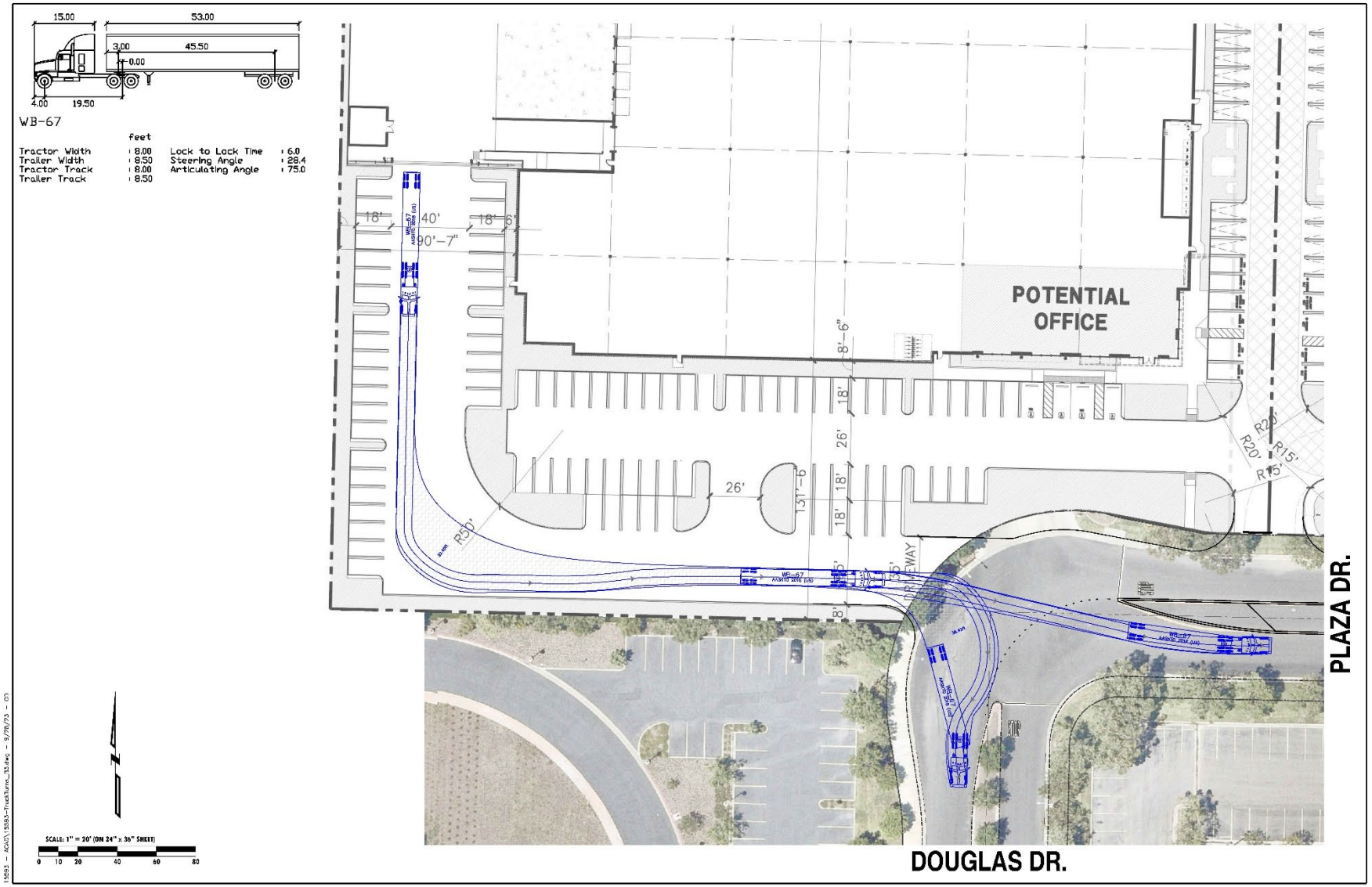


EXHIBIT 1-6: INBOUND TRUCK ACCESS AT DRIVEWAY 2

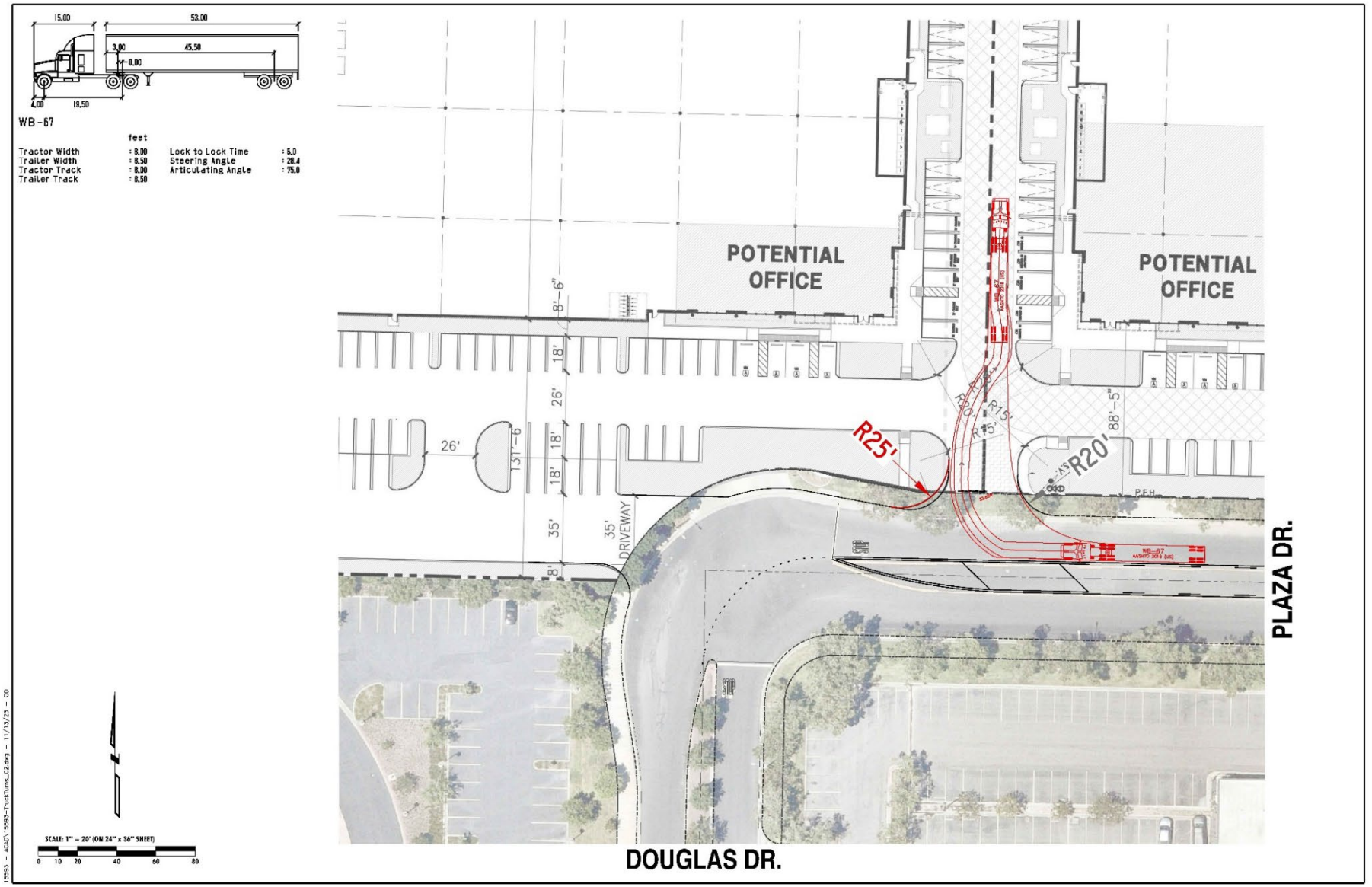


EXHIBIT 1-7: OUTBOUND TRUCK ACCESS AT DRIVEWAY 2

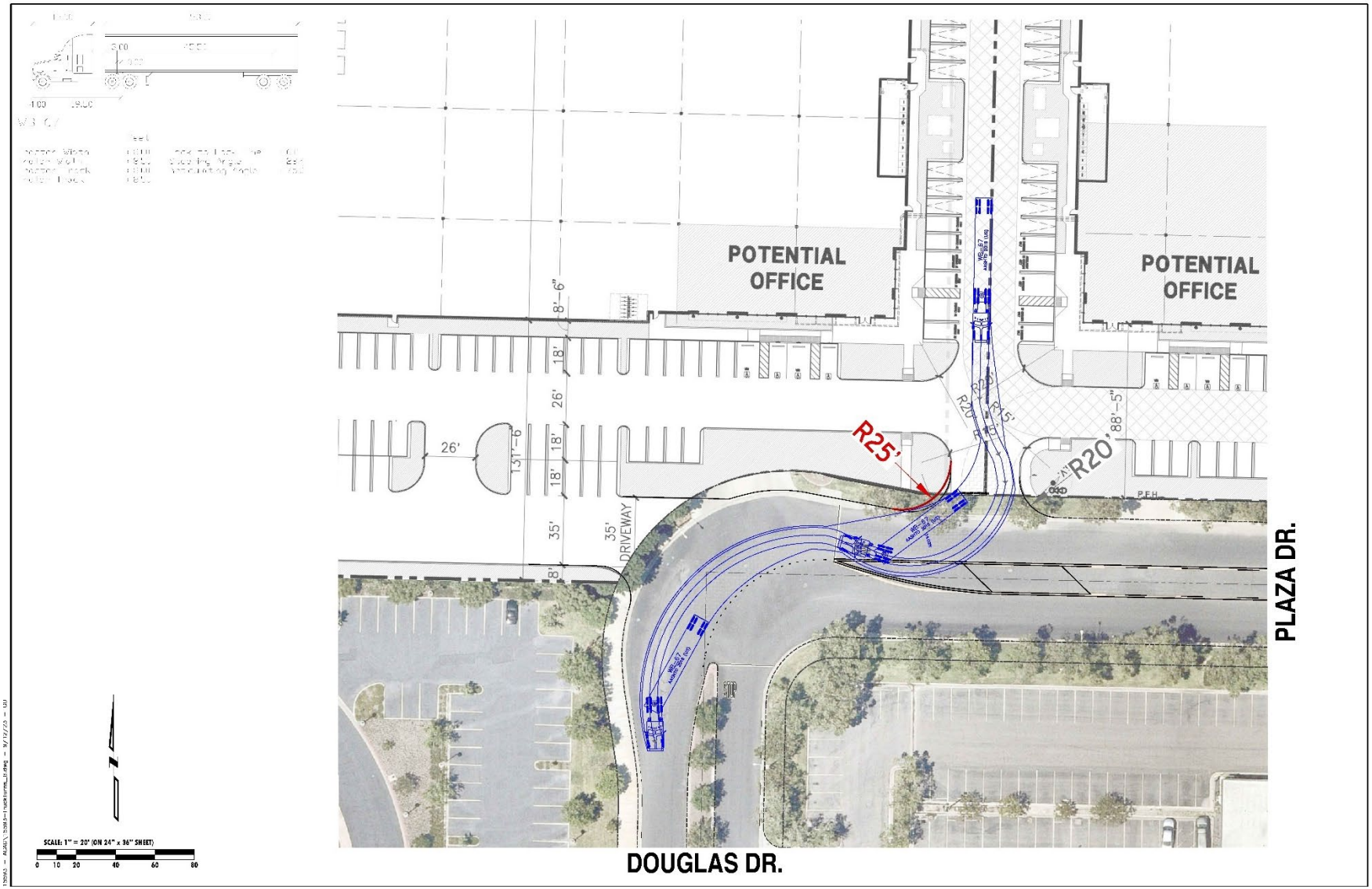


EXHIBIT 1-8: INBOUND ON-SITE TRUCK CIRCULATION VIA DRIVEWAY 2

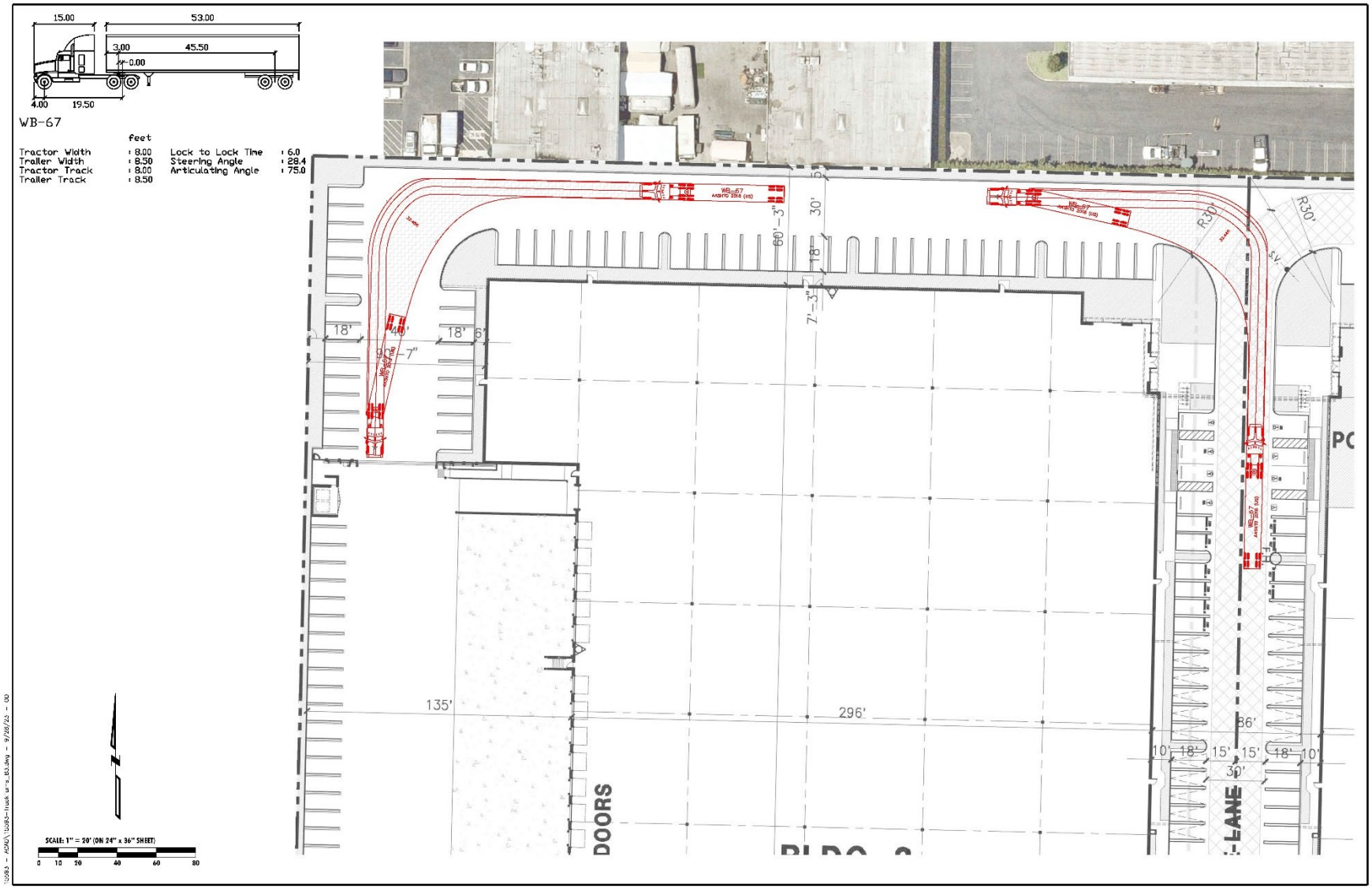


EXHIBIT 1-9: OUTBOUND ON-SITE TRUCK CIRCULATION VIA DRIVEWAY 2

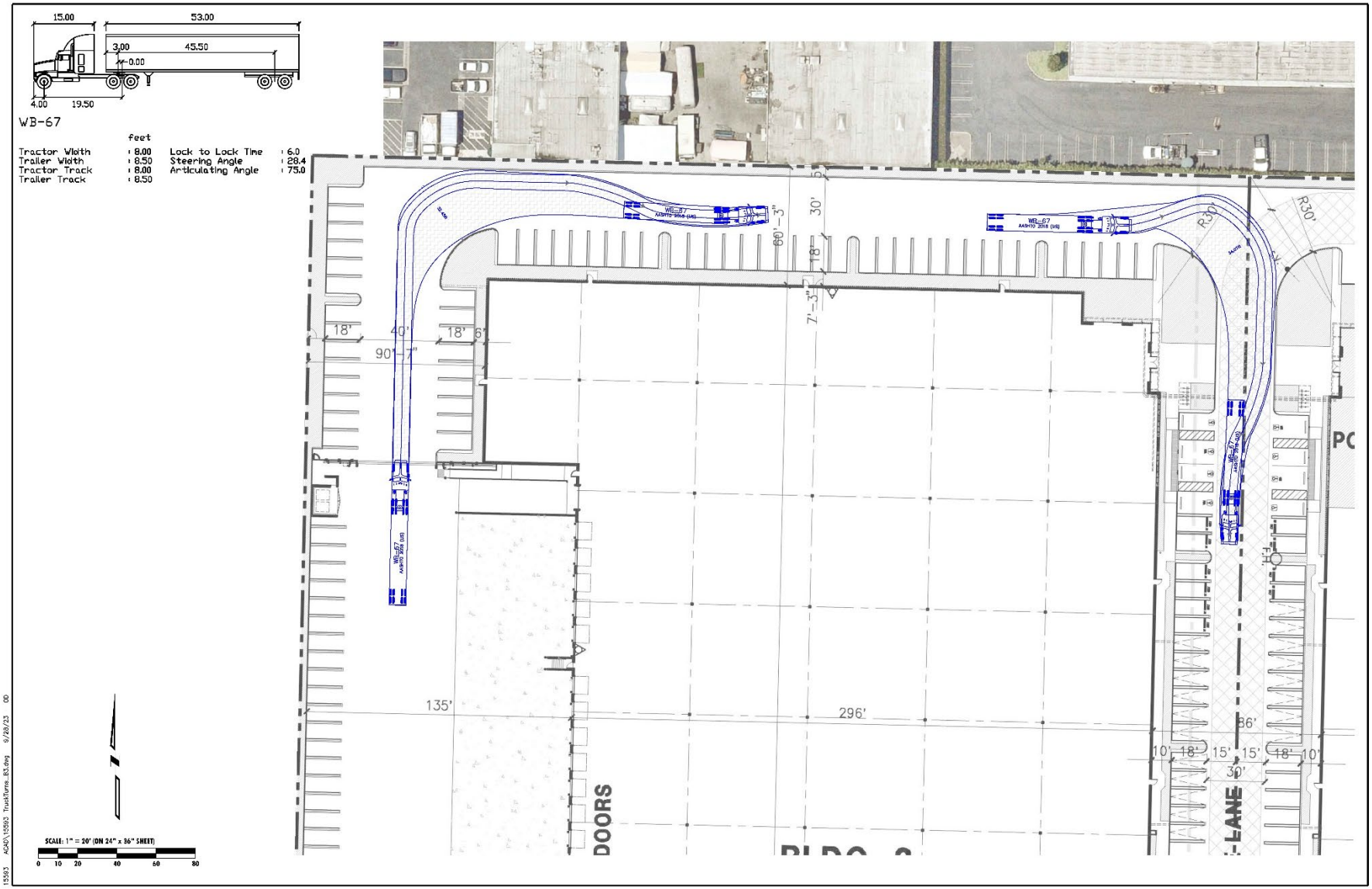
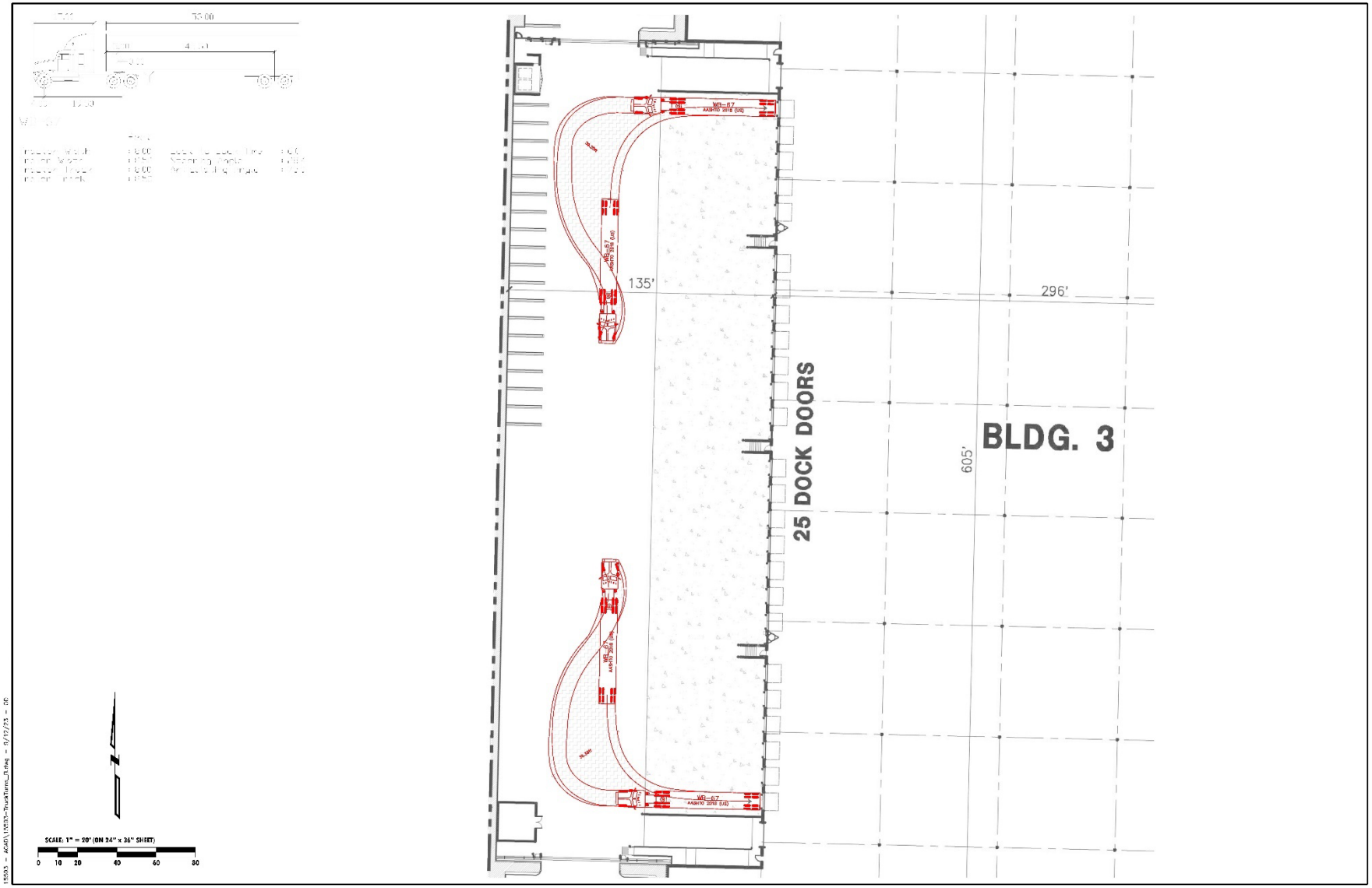


EXHIBIT 1-10: LOADING DOCK TRUCK CIRCULATION



1.8 QUEUING ANALYSIS

The traffic modeling and signal timing optimization software package SimTraffic has been utilized to assess the queues. SimTraffic is designed to model networks of signalized and unsignalized intersections, with the primary purpose of checking and fine-tuning signal operations. SimTraffic uses the input parameters from Synchro to generate random simulations. These random simulations generated by SimTraffic have been utilized to determine the 95th percentile queue lengths observed for each applicable turn lane. A SimTraffic simulation has been recorded up to 5 times, during the weekday AM and weekday PM peak hours, and has been seeded for 15-minute periods with 60-minute recording intervals.

A queuing analysis has been conducted for all signalized study area intersections under Future Year (2025) With Project traffic conditions to ensure the existing and proposed left turn storage can accommodate the 95th percentile peak hour queues. The results of the queuing analysis are shown in Table 1-3 and the worksheets for the weekday AM and PM peak hours are provided in Appendix 1.2 of this report for Future Year (2025) With Project traffic conditions. As shown on Table 1-3, there are no improvements needed to the turn lane storage lengths.

TABLE 1-3: PEAK HOUR QUEUING ANALYSIS

Intersection	Movement	Available Stacking Distance (Feet)[3]	95th Percentile Queue (Feet) AM Peak	95th Percentile Queue (Feet) PM Peak	Acceptable? [1] AM	Acceptable? [1] PM
Douglas Dr./Warland Dr. & Katella Av.	NBL	115	47	80	Yes	Yes
	SBL	90	25	52	Yes	Yes
	SBR	90	35	44	Yes	Yes
	EBL	250	75	49	Yes	Yes
	EBR	100	52	35	Yes	Yes
	WBL	250	42	66	Yes	Yes
	WBR	130	88	52	Yes	Yes
Douglas Dr./Dwy. 2 & Dwy. 1/Plaza Dr.	NBL/T/R	185	51	48	Yes	Yes
	SBL/T/R	100	0	33	Yes	Yes
	EBL/T/R	100	32	34	Yes	Yes
	WBL/T/R	165	48	57	Yes	Yes
Valley View St. & Plaza Dr./Chip Av.	NBL	190	97	34	Yes	Yes
	SBL	160	121	70	Yes	Yes
	EBL	110	26	87	Yes	Yes
	WBL	65	20	71	Yes	Yes

NB = Northbound; SB = Southbound; EB = Eastbound; WB = Westbound; L = Left; T = Through; R = Right

[1] Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 25 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown on this table, where applicable.

2 METHODOLOGIES

This section of the report presents the methodologies used to perform the traffic analyses summarized in this report. The methodologies described are consistent with the County's CMP Guidelines and the City's Transportation Operational Assessment (Level of Service Traffic Study) Guidelines.

2.1 LEVEL OF SERVICE

Traffic operations of roadway facilities are described using the term "Level of Service" (LOS). LOS is a qualitative description of traffic flow based on several factors, such as speed, travel time, delay, and freedom to maneuver. Six levels are typically defined ranging from LOS A, representing completely free-flow conditions, to LOS F, representing breakdown in flow resulting in stop-and-go conditions. LOS E represents operations at or near capacity, an unstable level where vehicles are operating with the minimum spacing for maintaining uniform flow.

2.2 INTERSECTION CAPACITY ANALYSIS

The definitions of LOS for interrupted traffic flow (flow restrained by the existence of traffic signals and other traffic control devices) differ slightly depending on the type of traffic control. The LOS is typically dependent on the quality of traffic flow at the intersections along a roadway. The 6th Edition Highway Capacity Manual (HCM) methodology expresses the LOS at an intersection in terms of delay time for the various intersection approaches. (4) The HCM uses different procedures depending on the type of intersection control.

2.2.1 SIGNALIZED INTERSECTIONS

Intersection Capacity Utilization (ICU)

The City of Cypress requires signalized intersections to be evaluated through ICU analysis which compares the peak hour traffic volumes to intersection capacity. Lane capacities of 1,700 vehicles per hour of green time have been assumed for the ICU calculations. 0.05 of volume to capacity (V/C) has been assumed representing 5 percent for the yellow and all-red signal indication and inherent vehicle delay between cycles with an assumed signal cycle of 100 seconds. The ICU LOS definitions based on V/C ratio are presented in Table 2-1. The Traffix software package has been utilized to evaluate the signalized intersections using the ICU methodology with the analysis parameters discussed above.

TABLE 2-1 INTERSECTION CAPACITY UTILIZATION (ICU) LOS DEFINITIONS

Level of Service	Critical Volume to Capacity Ratio
A	0.00 - 0.60
B	0.61 - 0.70
C	0.71 - 0.80
D	0.81 - 0.90
E	0.91 - 1.00
F	>1.00

Source: 2019 Orange County Congestion Management Program (CMP)

Highway Capacity Analysis (HCM)

Intersection LOS operations have also been reported based on the HCM methodology which are based on an intersection's average control delay. (4) Control delays include initial deceleration delay, queue move-up time, stopped delay, and final acceleration delay. For signalized intersections LOS is related to the average control delay per vehicle and is correlated to a LOS designation as described on Table 2-2.

The traffic modeling and signal timing optimization software package Synchro (Version 11) has been utilized to analyze signalized intersections. Synchro is a macroscopic traffic software program that is based on the signalized intersection capacity analysis as specified in the HCM. Macroscopic level models represent traffic in terms of aggregate measures for each movement at the study intersections. Equations are used to determine measures of effectiveness such as delay and queue length. The level of service and capacity analysis performed by Synchro takes into consideration optimization and coordination of signalized intersections within a network.

TABLE 2-2: SIGNALIZED INTERSECTION LOS THRESHOLDS

Description	Average Control Delay (Seconds), V/C ≤ 1.0	Level of Service, V/C ≤ 1.0[1]
Operations with very low delay occurring with favorable progression and/or short cycle length.	0 to 10.00	A
Operations with low delay occurring with good progression and/or short cycle lengths.	10.01 to 20.00	B
Operations with average delays resulting from fair progression and/or longer cycle lengths. Individual cycle failures begin to appear.	20.01 to 35.00	C
Operations with longer delays due to a combination of unfavorable progression, long cycle lengths, or high V/C ratios. Many vehicles stop and individual cycle failures are noticeable.	35.01 to 55.00	D
Operations with high delay values indicating poor progression, long cycle lengths, and high V/C ratios. Individual cycle failures are frequent occurrences. This is considered to be the limit of acceptable delay.	55.01 to 80.00	E
Operation with delays unacceptable to most drivers occurring due to over saturation, poor progression, or very long cycle lengths.	80.01 and up	F

Source: HCM, 6th Edition

[1] If V/C is greater than 1.0 then LOS is F per HCM.

A saturation flow rate of 1,700 has been utilized for all study area intersections. The peak hour traffic volumes have been adjusted using a peak hour factor (PHF) to reflect peak 15-minute volumes. Customary practice for LOS analysis is to use a peak 15-minute rate of flow. However, flow rates are typically expressed in vehicles per hour. The PHF is the relationship between the peak 15-minute flow rate and the full hourly volume (e.g., PHF = [Hourly Volume] / [4 x Peak 15-minute Flow Rate]). The use of a 15-minute PHF produces a more detailed analysis as compared to analyzing vehicles per hour. Existing PHFs have been used for all analysis scenarios. Per the HCM, PHF values over 0.95 often are indicative of high traffic volumes with capacity constraints on peak hour flows while lower PHF values are indicative of greater variability of flow during the peak hour. (4)

2.2.2 UNSIGNALIZED INTERSECTIONS

The ICU methodology is not applicable to unsignalized intersections. As such, the operations of unsignalized intersections be evaluated using the methodology described in the HCM. (4) The LOS rating is based on the weighted average control delay expressed in seconds per vehicle (see Table 2-3). At two-way or side-street stop-controlled intersections, LOS is calculated for each controlled

movement and for the left turn movement from the major street, as well as for the intersection as a whole. For approaches composed of a single lane, the delay is computed as the average of all movements in that lane. Delay for the intersection is reported for the worst individual movement at a two-way stop-controlled intersection. For all-way stop controlled intersections, LOS is computed for the intersection as a whole (average delay).

TABLE 2-3: UNSIGNALIZED INTERSECTION LOS THRESHOLDS

Description	Average Control Delay (Seconds), V/C ≤ 1.0	Level of Service, V/C ≤ 1.0[1]
Little or no delays.	0 to 10.00	A
Short traffic delays.	10.01 to 15.00	B
Average traffic delays.	15.01 to 25.00	C
Long traffic delays.	25.01 to 35.00	D
Very long traffic delays.	35.01 to 50.00	E
Extreme traffic delays with intersection capacity exceeded.	> 50.00	F

Source: HCM, 6th Edition

[1] If V/C is greater than 1.0 then LOS is F per HCM.

2.3 TRAFFIC SIGNAL WARRANT ANALYSIS METHODOLOGY

The term "signal warrants" refers to the list of established criteria used by the California Department of Transportation (Caltrans) and other public agencies to quantitatively justify or determine the potential need for installation of a traffic signal at an otherwise unsignalized intersection. This TA uses the signal warrant criteria presented in the latest edition of the Caltrans California Manual on Uniform Traffic Control Devices (CA MUTCD). (5)

The signal warrant criteria for Existing study area intersections are based upon several factors, including volume of vehicular and pedestrian traffic, frequency of accidents, and location of school areas. The CA MUTCD indicates that the installation of a traffic signal should be considered if one or more of the signal warrants are met. (5) Specifically, this TA utilizes the Peak Hour Volume-based Warrant 3 as the appropriate representative traffic signal warrant analysis for existing traffic conditions and for all future analysis scenarios for existing unsignalized intersections. Warrant 3 is appropriate to use for this TA because it provides specialized warrant criteria for intersections with rural characteristics. For the purposes of this study, the speed limit was the basis for determining whether Urban or Rural warrants were used for a given intersection. Rural warrants have been used where posted speed limits on the major roadways with unsignalized intersections that are over 40 miles per hour while urban warrants have been used where posted speeds are 40 miles per hour or below.

Traffic signal warrant analyses were performed for the following study area intersection shown on Table 2-4:

TABLE 2-4: TRAFFIC SIGNAL WARRANT ANALYSIS LOCATIONS

#	Intersection
2	Douglas Dr./Dwy. 2 & Dwy. 1/Plaza Dr.
3	Existing Driveway/McDonnell Dr. & Plaza Dr.

The Existing conditions traffic signal warrant analysis is presented in the subsequent section, Section 3 *Area Conditions* of this report. The traffic signal warrant analyses for future conditions are presented in Section 5 *Future Year (2025) Traffic Conditions* of this report. It is important to note that a signal warrant defines the minimum condition under which the installation of a traffic signal might be warranted. Meeting this threshold condition does not require that a traffic control signal be installed at a particular location, but rather, that other traffic factors and conditions be evaluated in order to determine whether the signal is truly justified. It should also be noted that signal warrants do not necessarily correlate with LOS. An intersection may satisfy a signal warrant condition and operate at or above acceptable LOS or operate below acceptable LOS and not meet a signal warrant.

2.4 MINIMUM ACCEPTABLE LEVELS OF SERVICE (LOS)

The definition of an intersection deficiency has been obtained from the City's General Plan. The City of Cypress has adopted a LOS D or better as the desired citywide operating standard for most City streets. However, given the influence of regional traffic on Valley View Street, Lincoln Avenue, and Katella Avenue, which are beyond the control of the City of Cypress, LOS E or better has been adopted as the minimum operating LOS for street segments and intersections on the aforementioned arterials due to the high volume of traffic carried on these roadways.

2.5 DEFICIENCY CRITERIA

For the intersections that lie within the City of Cypress, determination of whether the Project has an adverse effect on intersection operations will be based on a comparison of without and with project levels of service.

For HCM Analysis: For signalized intersections, the traffic operations deficiency shall be determined in accordance with Table 2-5 below:

TABLE 2-5: HCM SIGNALIZED INTERSECTION DEFICIENCY CRITERIA

With Project LOS	Project-Related Increase in Delay (in seconds)
C or better	> 6.0 seconds
D	> 4.0 seconds
E, F	> 2.0 seconds

To determine whether a project's added traffic would result in a deficiency at a study area unsignalized intersection in accordance with the City's HCM methodology, the following criteria shall be applied:

a) Worsens the LOS at an unsignalized intersection from LOS D or better to LOS E or F;

b) Causes an increase in the delay equal to or more than three (3.0) seconds at an unsignalized intersection that operates at LOS E or F with project.

For ICU Analysis: a deficiency at both signalized study intersections will be determined in accordance with Table 2-6:

TABLE 2-6: ICU INTERSECTION DEFICIENCY CRITERIA

Without Project LOS	With Project Volume/Capacity (V/C) Ratio	With Project Level of Service
D	>0.900 or greater	LOS E or F
Without Project LOS	With Project Volume/Capacity (V/C) Ratio	Project-Related increase in V/C
E, F	>0.900 or greater	Equal to or greater than 0.03

Improvements: Any decrease beyond the minimum acceptable LOS due to the addition of project traffic requires alternative corrective measures to return the intersection to an acceptable LOS. For intersections operating below the minimum acceptable LOS prior to the addition of project traffic, and the LOS would be worsened with the addition of project traffic, corrective measures should be identified, if feasible, to return to "without project" condition LOS or V/C (volume/capacity ratio), whichever is greater. Alternative corrective measures to roadway widening which may include the reduction of project traffic volumes through application of signal system upgrades, phasing changes, synchronization, and/or project design improvements which are expected to improve capacity and/or efficiency within the transportation network (e.g., changes to a project's site access or internal circulation scheme) shall be identified with concurrence from the City Traffic Engineer.

3 AREA CONDITIONS

This section provides a summary of the existing circulation network, the City of Cypress General Plan Circulation Network, and a review of existing peak hour intersection operations and traffic signal warrant analyses.

3.1 EXISTING CIRCULATION NETWORK

Pursuant to the scoping agreement with City of Cypress staff (Appendix 1.1), the study area includes a total of 4 existing and future intersections as shown previously on Exhibit 1-3, where the Project is anticipated to contribute 25 or more peak hour trips or were added at the City's request during the scoping process. Exhibit 3-1 illustrates the study area intersections located near the proposed Project and identifies the number of through traffic lanes for existing roadways and intersection traffic controls.

3.2 CITY OF CYPRESS GENERAL PLAN CIRCULATION ELEMENT

As noted previously, the Project site is located within the City of Cypress. The roadway classifications and planned (ultimate) roadway cross-sections of the major roadways within the study area, as identified on City of Cypress General Plan Circulation Element, are described subsequently. Exhibit 3-2 shows the City of Cypress General Plan Circulation Element and Exhibit 3-3 illustrates the City of Cypress General Plan roadway cross-sections.

Major roadways are six-lane roadways and typically include a raised median. These roadways typically have a 120-foot right-of-way and a 104-foot curb-to-curb measurement. These roadways typically direct traffic through major development areas. The following study area roadways within the City are classified as a Major:

- Katella Avenue
- Valley View Street

Plaza Drive/Douglas Drive is not a classified General Plan roadway.

EXHIBIT 3-1: EXISTING NUMBER OF THROUGH LANES AND INTERSECTION CONTROLS



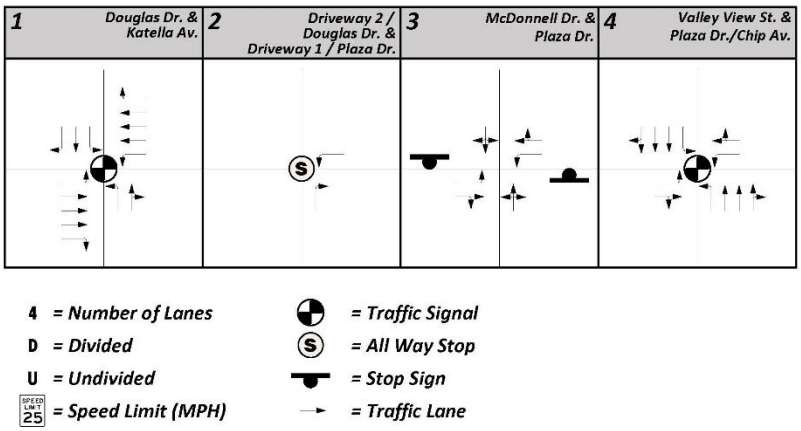
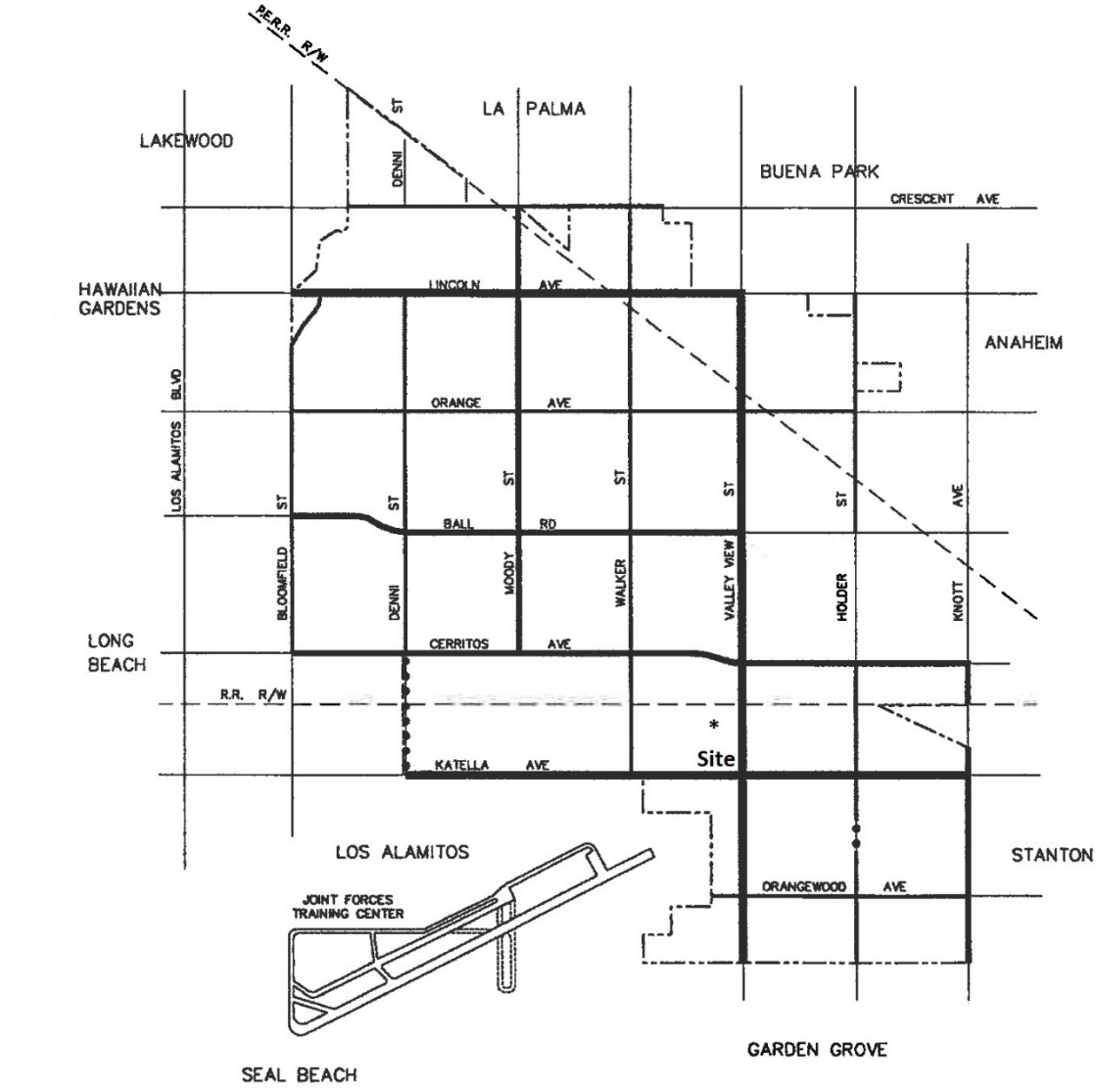


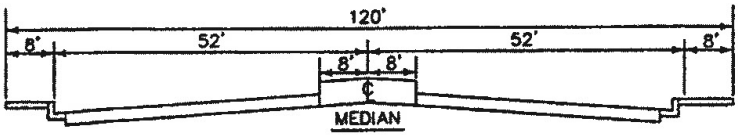
EXHIBIT 3-2: CITY OF CYPRESS GENERAL PLAN CIRCULATION ELEMENT



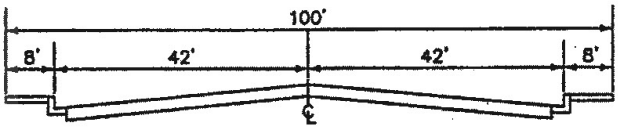
Source: Kimley-Horn and Associates.

EXHIBIT 3-3: CITY OF CYPRESS GENERAL PLAN ROADWAY CROSS-SECTIONS

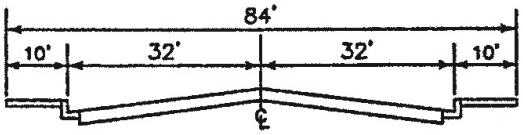
MAJOR STREET



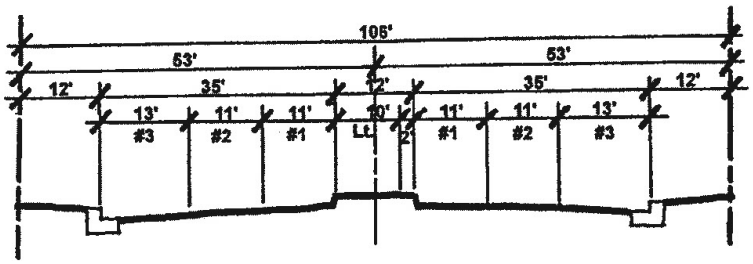
PRIMARY STREET



SECONDARY STREET



LINCOLN AVENUE TYPICAL STREET SECTION



Source: Kimley-Horn and Associates.

N

CITY OF CYPRESS GENERAL PLAN
Standard Street Sections

RBF PLANNING ■ DESIGN ■ CONSTRUCTION

Exhibit CIR-6

3.3 BICYCLE & PEDESTRIAN FACILITIES

The City's bike network is shown on Exhibit 3-4. As shown on Exhibit 3-4, both Katella Avenue and Valley View Street currently accommodate off-street bike paths (there are no on-street bike lanes). Exhibit 3-5 illustrates the existing crosswalks and sidewalks throughout the study area. As shown on Exhibit 3-5, there are pedestrian facilities in place in the vicinity of the Project site along Douglas Drive, Katella Avenue, and Valley View Street. There is a 10-foot sidewalk along the west side of Douglas Drive between the proposed Project down to Katella Avenue to the south. Once completed by the adjacent development to the east, there will be a 5-foot sidewalk along the north side of Plaza Drive providing pedestrian connectivity between the proposed Project and approximately 450-feet west of Valley View Street. The signalized intersection of Douglas Drive at Katella Avenue has striped crosswalks on all approaches with push buttons. All four corners of the intersection of Douglas Drive at Katella Avenue have tactile warning strips and curb access ramps. The intersection of Valley View Street at Plaza Drive/Chip Avenue does not have a marked crosswalk across the north leg of the intersection. All other approaches include striped crosswalks with the appropriate pedestrian push buttons, tactile warning strip, and curb access ramps.

3.4 TRANSIT SERVICE

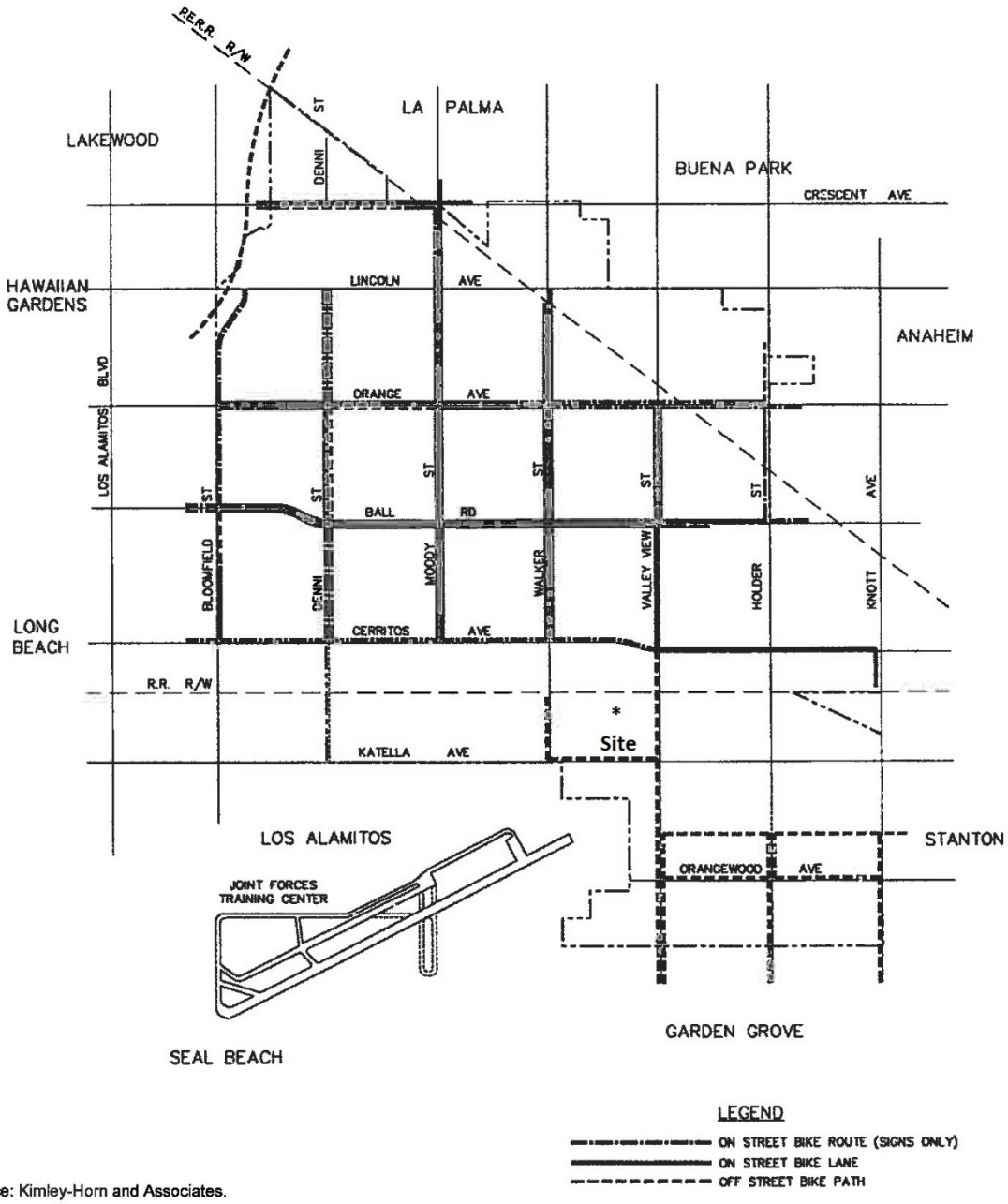
The study area is currently served by Orange County Transit Authority (OCTA) with bus service along Katella Avenue and Valley View Street. OCTA Route 50 runs along Katella Avenue and currently has existing bus stops just east of Douglas Drive and west of Valley View Street along the north side and operates seven days a week. Route 50 runs between Long Beach and Orange (including major stops at the Anaheim Regional Transportation Terminal Center and the VA Hospital in Long Beach). Buses stop approximately every 20-25 minutes during the morning and evening peak commute hours. OCTA Route 123 runs along Valley View Street and there are existing bus stops north of Plaza Drive and only operates Monday through Friday. Route 123 runs between Anaheim and Huntington Beach (including major stops at the Buena Park Metrolink Station, Fullerton Transportation Center, Anaheim Canyon Metrolink Station, and Goldenwest Transportation Center/Park and Ride). Buses stop approximately every hour (60 minutes) during the morning and evening commute hours (operational between 4:00 AM and 10:00 PM).

The existing transit stops are in close proximity to the Project site and could serve the site in the future. The transit services are illustrated on Exhibit 3-6. Transit service is reviewed and updated by OCTA periodically to address ridership, budget, and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate.

3.5 TRUCK ROUTES

The City's truck routes are shown on Exhibit 3-7. Both Katella Avenue and Valley View Street adjacent to the Project are identified as City truck routes. These truck routes serve both the proposed Project and future cumulative development projects throughout the study area.

EXHIBIT 3-4: CITY OF CYPRESS GENERAL PLAN BIKE NETWORK



Source: Kimley-Horn and Associates.

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RBF CONSULTING PLANNING ■ DESIGN ■ CONSTRUCTION

CITY OF CYPRESS GENERAL PLAN
Existing Bikeways

Exhibit CIR-4

EXHIBIT 3-5: EXISTING PEDESTRIAN FACILITIES

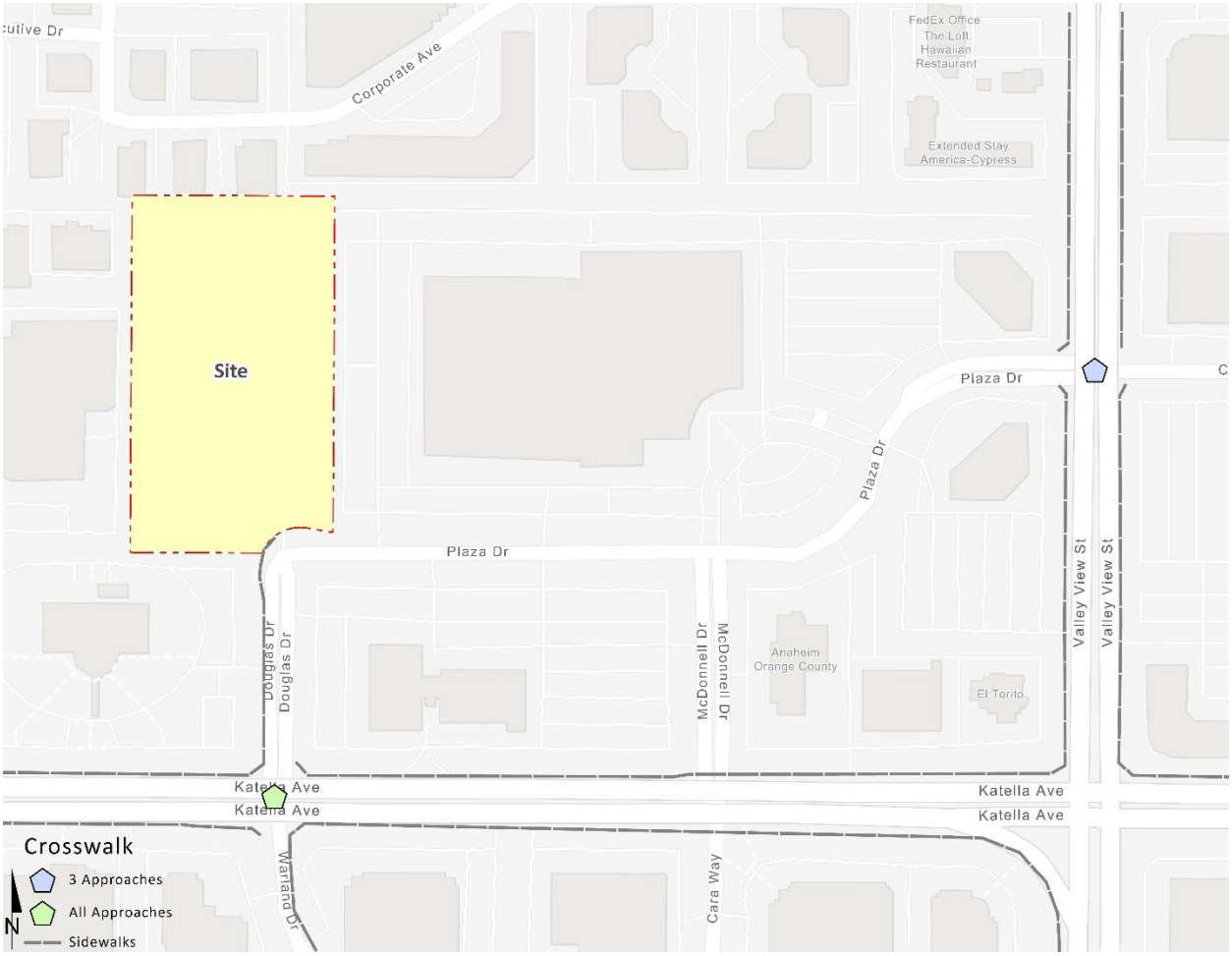


EXHIBIT 3-6: EXISTING TRANSIT ROUTES

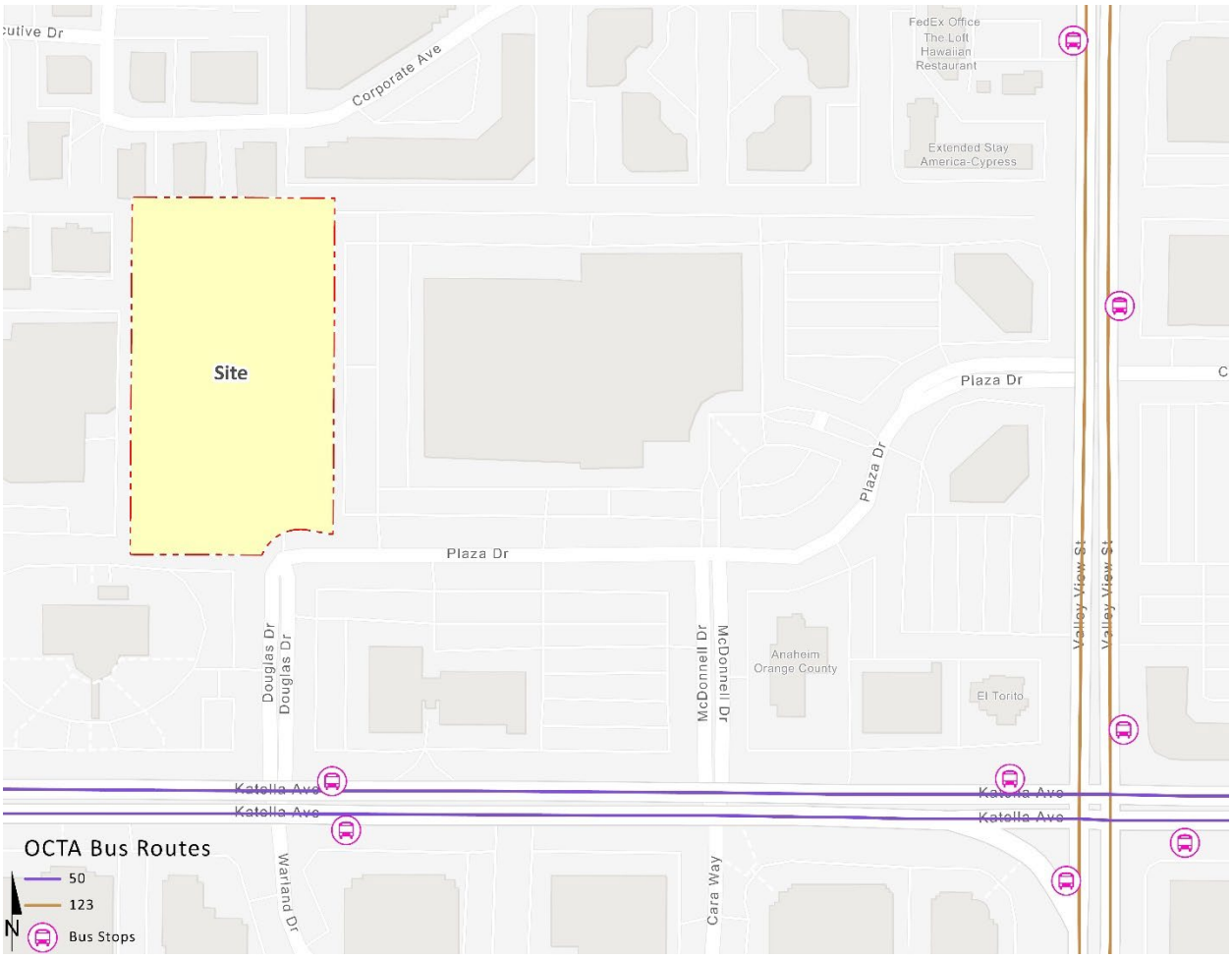
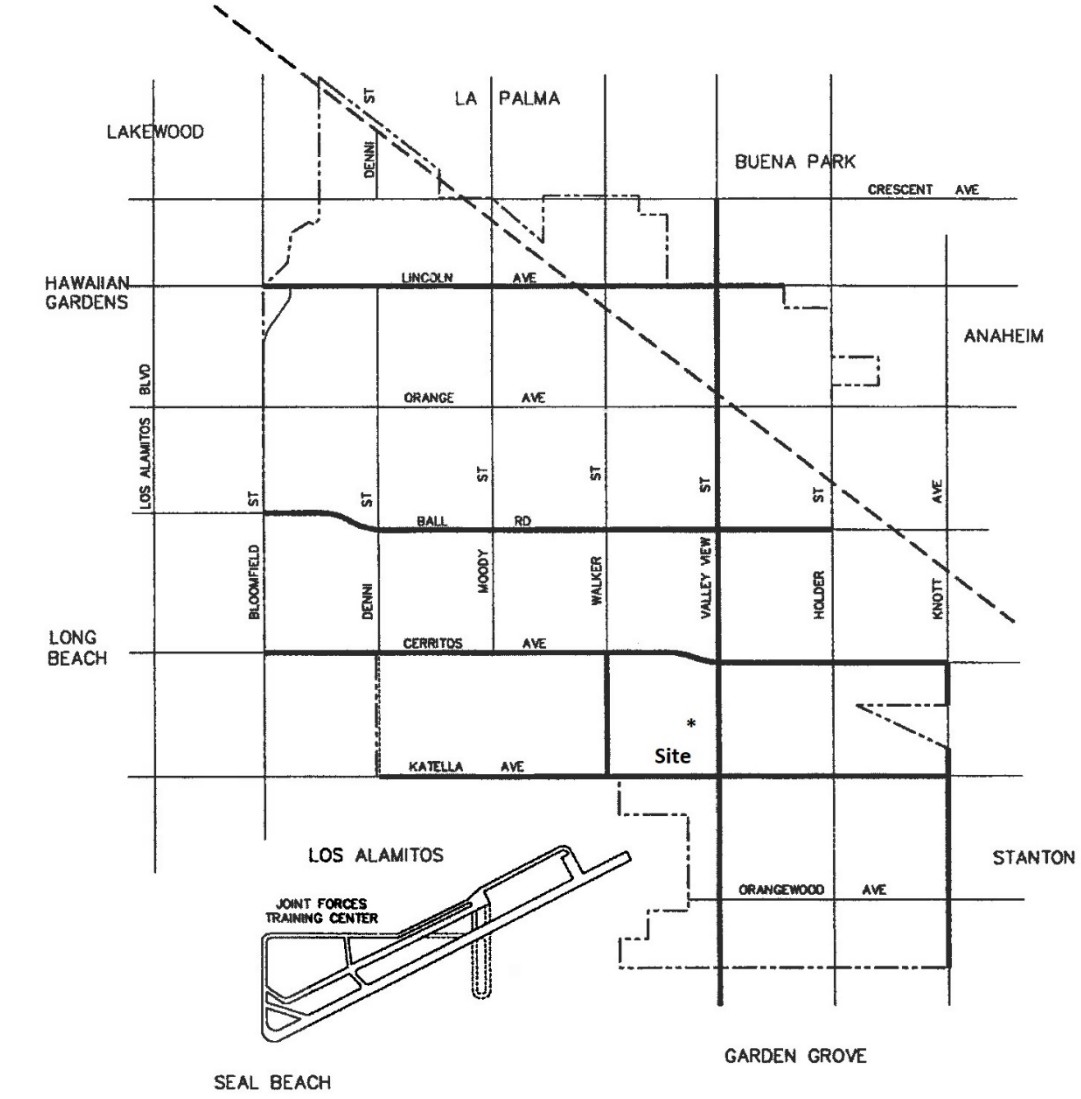


EXHIBIT 3-7: CITY OF CYPRESS TRUCK ROUTES



Source: Kimley-Horn and Associates.

N

CITY OF CYPRESS GENERAL PLAN

Existing Truck Routes and Rail Lines

RBF CONSULTING — PLANNING ■ DESIGN ■ CONSTRUCTION

Exhibit CIR-5

3.6 EXISTING (2023) TRAFFIC COUNTS

The intersection LOS analysis is based on the traffic volumes observed during the peak hour conditions using traffic count data collected in August 2022 when local schools were in session and operating on normal bell schedules. The following peak hours were selected for analysis:

- Weekday AM Peak Hour (peak hour between 7:00 AM and 9:00 AM)
- Weekday PM Peak Hour (peak hour between 4:00 PM and 6:00 PM)

There were no observations made in the field that would indicate atypical traffic conditions on the count dates, such as construction activity or detour routes and near-by schools were in session and operating on normal schedules. The 2022 peak hour volumes have been adjusted to increase turning movements into low occupancy office uses in the surrounding area by 30 percent. Lastly, the volumes were then increased by an additional two percent for all movements in order to adjust the 2022 traffic counts to 2023. The raw manual peak hour turning movement traffic count data sheets are included in Appendix 3.1. In addition, volume worksheets have been included identifying the adjusted 2023 volumes along with the passenger car equivalent (PCE) calculations for all analysis scenarios.

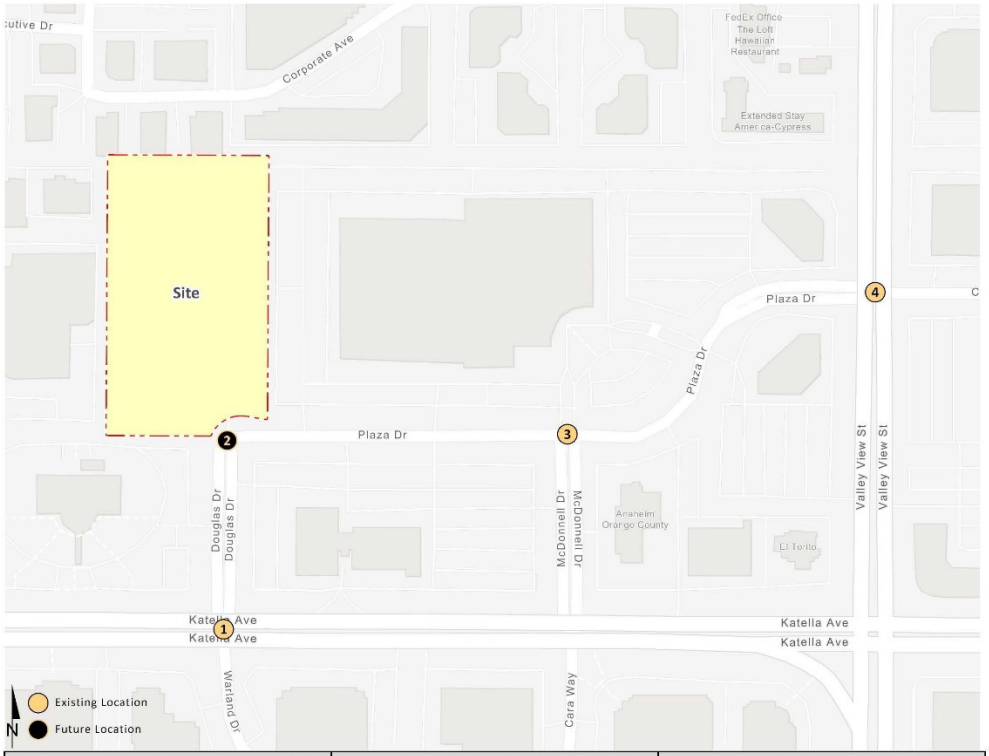
Existing weekday average daily traffic (ADT) volumes on arterial highways throughout the study area are shown on Exhibit 3-8. Existing ADT volumes were based upon factored intersection peak hour counts collected by Urban Crossroads, Inc. using the following formula for each intersection leg:

Weekday PM Peak Hour (Approach Volume + Exit Volume) x 11.3 = Leg Volume

A comparison of the PM peak hour and daily traffic volumes of various roadway segments within the study area indicated that the peak-to-daily relationship is approximately 8.9 percent. As such, the above equation utilizing a factor of 11.3 estimates the ADT volumes on the study area roadway segments assuming a peak-to-daily relationship of approximately 8.9 percent (i.e., 1/0.089 = 11.3) and was assumed to sufficiently estimate ADT volumes for planning-level analyses. This factor is consistent with that used for other traffic studies within the study area. Existing weekday AM and weekday PM peak hour intersection volumes are shown on Exhibit 3-8.

Volumes reported on the exhibits are expressed in passenger car equivalent (PCE) volumes as the intersection operations analysis utilizes PCE volumes. Note that only the intersection turning movement volumes are expressed in PCE and ADTs are presented as actual vehicles as used in other technical studies. PCEs allow the typical "real-world" mix of vehicle types to be represented as a single, standardized unit, such as the passenger car, to be used for the purposes of capacity and level of service analyses.

EXHIBIT 3-8: EXISTING (2023) TRAFFIC VOLUMES (PCE)



1 Douglas Dr./Warland Dr. & Katella Av.

								39,950
1,000							↱	34(6)
	15(47)	1(2)	2(26)				←	1782(1608)
	↲	↓	↳				↰	12(9)
	27(11)	→		↰	↑	↱		
	1702(1963)	→		26(83)	2(1)	5(7)		
	72(32)	↲						
42,950								1,450

2 Douglas Dr./Dwy. 2 & Dwy. 1/Plaza Dr.

								1,350
							↰	53(100)
								↱
								21(24)
								1,350

3 McDonnell Dr. & Plaza Dr.

Nominal								800
							↱	4(0)
	0(3)						←	104(80)
	↓						↰	8(11)
	23(86)	→		↰	↑	↱		
	0(2)	↲		19(5)	2(0)	77(9)		
1,900								350

4 Valley View St. & Plaza Dr./Chip Av.

								6,750
42,050							↱	39(355)
	154(23)	1551(1503)	254(52)				←	0(30)
	↲	↓	↳				↰	12(162)
	9(168)	↳		↰	↑	↱		
	9(0)	→		22(4)	1516(1967)	181(12)		
	15(61)	↲						
3,200								41,150

##(##) AM(PM) Peak Hour Intersection Volumes

Average Daily Trips

3.7 INTERSECTION OPERATIONS ANALYSIS

Existing peak hour traffic operations have been evaluated for the study area intersections based on the analysis methodologies presented in Section 2.2 *Intersection Capacity Analysis* of this report. The intersection operations analysis results are summarized on Table 3-1, which indicates that all existing study area intersections are currently operating at acceptable LOS during the peak hours. The intersection operations analysis worksheets are included in Appendix 3.2 of this TA.

TABLE 3-1: INTERSECTION ANALYSIS FOR EXISTING (2023) CONDITIONS

#	Intersection	Traffic Control[3]	Delay[1] (secs.) AM	Delay[1] (secs.) PM	Level of Service AM	Level of Service PM	ICU[2] (V/C) AM	ICU[2] (V/C) PM	Level of Service AM	Level of Service PM
1	Douglas Dr./Warland Dr. & Katella Av.	TS	5.4	8.2	A	A	0.44	0.52	A	A
2	Douglas Dr./Dwy. 2 & Dwy. 1/Plaza Dr.	AWS	7.2	7.7	A	A	--	--	--	--
3	Existing Driveway/McDonnell Dr. & Plaza Dr.	CSS	9.2	10.8	A	B	--	--	--	--
4	Valley View St. & Plaza Dr./Chip Av.	TS	15.4	35.7	B	D	0.56	0.79	A	C

1 Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown. HCM delay reported in seconds.

2 ICU reported as a volume-to-capacity ratio and for signalized intersections only. ICU not applicable to unsignalized inspections.

3 TS = Traffic Signal; AWS = All-Way Stop; CSS = Cross-Street Stop

3.8 TRAFFIC SIGNAL WARRANTS ANALYSIS

Traffic signal warrants for Existing traffic conditions are based on existing peak hour intersection turning volumes. There are no unsignalized study area intersections that currently warrant a traffic signal for Existing traffic conditions. Existing conditions traffic signal warrant analysis worksheets are provided in Appendix 3.3.

4 PROJECTED FUTURE TRAFFIC

This section presents the traffic volumes estimated to be generated by the Project, as well as the Project's trip assignment onto the study area roadway network. The Project includes the development of a 191,394 square foot warehouse building. The TA evaluates 191,394 square feet of high-cube cold storage warehouse use. The proposed Project will replace an existing 150,626 square foot office building. The anticipated Opening Year for the proposed Project is 2025. Access to the site will be accommodated via two driveways at Plaza Drive and Douglas Drive.

4.1 PROJECT TRIP GENERATION

Trip generation represents the amount of traffic which is both attracted to and produced by a development.

4.1.1 EXISTING USE

The proposed Project will replace an existing 150,626 square foot office building. At the time traffic counts were conducted on August 30, 2022, the office building was 41% occupied, however, in an effort to recognize that leased tenants may have been underutilizing the office space, the building has been assumed to be 25% occupied for the purposes of the trip generation comparison. In an effort to understand the existing traffic associated with the current uses, the trip generation rates used for this analysis are based upon information collected by the ITE as provided in their Trip Generation Manual (11th Edition, 2021) for the existing general office (ITE Land Use Code 710) use (see Table 4-1).

General Office (ITE Land Use Code 710) has been used to calculate the trip generation for the existing 37,657 square feet of occupied office use (or 25% of 150,626 square feet). The trip generation summary illustrating daily, and peak hour trip generation estimates for the existing uses are also shown on Table 4-1. As shown on Table 4-1, the existing use generates a total of 408 two-way trips per day with 57 AM peak hour trips and 54 PM peak hour trips.

TABLE 4-1: EXISTING TRIP GENERATION SUMMARY

Land Use[1]	Units[2]	ITE LU Code	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
General Office (based on average rates)	TSF	710	1.34	0.18	1.52	0.24	1.20	1.44	10.84

[1] Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Eleventh Edition (2021).

[2] TSF = thousand square feet

Land Use	Quantity	Units[1]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
General Office[2]	37.657	TSF	50	7	57	9	45	54	408

[1] TSF = Thousand Square Feet

[2] 25% of the 150,626 square foot office building was occupied in August 2022 (or 37,657 square feet).

4.1.2 PROPOSED PROJECT

The proposed Project consists of a single 191,394 square foot warehouse building. In order to develop the traffic characteristics of the proposed project, trip-generation statistics published in the ITE Trip Generation Manual (11th Edition, 2021) was used for the proposed Project. Table 4-2 summarizes the trip generation rates. For purposes of this TA, the following land use and vehicle mix has been utilized:

- ITE land use code 157 (High-Cube Cold Storage Warehouse) has been used to derive site specific trip generation estimates for up to 191,394 square feet. High-cube cold storage warehouses include warehouses characterized by the storage and/or consolidation of manufactured goods (and to a lesser extent, raw materials) prior to their distribution to retail locations or other warehouses. High-cube cold storage warehouses are facilities typified by temperature-controlled environments for frozen food or other perishable products. The High-Cube Cold Storage Warehouse vehicle mix (passenger cars versus trucks) has been obtained from the ITE's Trip Generation Manual. The truck percentages were further broken down by axle type per the following South Coast Air Quality Management District (SCAQMD) recommended truck mix: 2-Axle = 34.7%; 3-Axle = 11.0%; 4+-Axle = 54.3%.

TABLE 4-2: TRIP GENERATION RATES

Land Use[1]	Units[2]	ITE LU Code	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Actual Vehicle Trip Generation Rates									
High-Cube Cold Storage Warehouse[3]	TSF	157	0.085	0.025	0.110	0.034	0.086	0.120	2.120
Passenger Cars (AM-72.7%, PM-75.0%, Daily-64.6%)			0.076	0.004	0.080	0.019	0.071	0.090	1.370
2-Axle Trucks (AM-9.5%, PM-8.7%, Daily-12.3%)			0.003	0.007	0.010	0.005	0.005	0.010	0.260
3-Axle Trucks (AM-3.0%, PM-2.8%, Daily-3.9%)			0.001	0.002	0.003	0.002	0.001	0.003	0.083
4+-Axle Trucks (AM-14.8%, PM-13.6%, Daily-19.2%)			0.005	0.011	0.016	0.008	0.008	0.016	0.407
Passenger Car Equivalent (PCE) Trip Generation Rates									
High-Cube Cold Storage Warehouse[3]	TSF	157	0.085	0.025	0.110	0.034	0.086	0.120	2.120
Passenger Cars			0.076	0.004	0.080	0.019	0.071	0.090	1.370
2-Axle Trucks (PCE = 1.5)			0.005	0.011	0.016	0.008	0.008	0.016	0.390
3-Axle Trucks (PCE = 2.0)			0.002	0.005	0.007	0.004	0.003	0.007	0.165
4+-Axle Trucks (PCE = 3.0)			0.015	0.034	0.049	0.024	0.025	0.049	1.222

[1] Trip Generation & Vehicle Mix Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Eleventh Edition (2021).

[2] TSF = thousand square feet

[3] Truck Mix: South Coast Air Quality Management District's (SCAQMD) recommended truck mix, by axle type.
Normalized % - With Cold Storage: 34.7% 2-Axle trucks, 11.0% 3-Axle trucks, 54.3% 4-Axle trucks.

PCE factors were applied to the trip generation rates for heavy trucks (2-axles, 3-axles, and 4+-axles). PCEs allow the typical "real-world" mix of vehicle types to be represented as a single, standardized unit, such as the passenger car, to be used for the purposes of capacity and LOS analyses. The PCE factors are consistent with those used on other near-by projects.

The trip generation summary illustrating daily, and peak hour trip generation estimates for the proposed Project are summarized on Table 4-3 in actual vehicles. The proposed Project is anticipated to generate 406 two-way trips per day with 21 AM peak hour trips and 24 PM peak hour trips (actual vehicles). Intersection operations analysis for a truck-intensive project would be required to utilize the PCE trip generation consistent with the City's Guidelines. As such, the Project's trip generation in PCE is also shown on Table 4-3. The Project is anticipated to generate 604 two-way PCE trips per day with 29 PCE AM peak hour trips and 32 PCE PM peak hour trips.

TABLE 4-3: PROJECT TRIP GENERATION SUMMARY

Land Use	Quantity	Units[1]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Actual Vehicles:									
High-Cube Cold Storage Warehouse	191.394	TSF							
Passenger Cars:			15	1	16	4	14	18	262
2-axle Trucks:			1	1	2	1	1	2	50
3-axle Trucks:			0	0	0	0	0	0	16
4+-axle Trucks:			1	2	3	2	2	4	78
Total Truck Trips (Actual Vehicles):			2	3	5	3	3	6	144
Total Trips (Actual Vehicles)[2]			**17**	**4**	**21**	**7**	**17**	**24**	**406**
Passenger Car Equivalent (PCE):									
High-Cube Cold Storage Warehouse	191.394	TSF							
Passenger Cars:			15	1	16	4	14	18	262
2-axle Trucks:			1	2	3	1	2	3	76
3-axle Trucks:			0	1	1	1	0	1	32
4+-axle Trucks:			3	6	9	5	5	10	234
Total Truck Trips (PCE):			4	9	13	7	7	14	342
Total Trips (PCE)[2]			**19**	**10**	**29**	**11**	**21**	**32**	**604**

Note: Due to rounding, some of the numbers reflected in the table to not reflect actual calculated amounts.

[1] TSF = Thousand Square Feet

[2] Total = Passenger Cars + Trucks

4.1.3 TRIP GENERATION COMPARISON

Table 4-4 shows the trip generation comparison between the existing and proposed use. It is our understanding that the existing warehouse/office building is currently vacant and generates only incidental vehicle trips, however, should the existing site be fully occupied, then it is anticipated there would be a net reduction in trips. The resulting net new trips are identified at the bottom of Table 4-4. The trip generation comparison is based on PCE as the existing and proposed uses are truck-intensive uses (any intersection operations analysis would use the PCE-based trip generation). As shown on Table 4-4, the Project is anticipated to generate a net increase of 196 two-way trips per day with a net reduction of 28 AM peak hour trips and net reduction of 22 PM peak hour trips (in PCE). For the purposes of the TA, the trip generation shown on Table 4-3 will be utilized for the intersection operations analyses (no credit for existing use).

TABLE 4-4: TRIP GENERATION COMPARISON

Land Use	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Proposed Project							
Passenger Cars:	15	1	16	4	14	18	262
Total Truck Trips (PCE):	4	9	13	7	7	14	342
Total Trips (PCE)	**19**	**10**	**29**	**11**	**21**	**32**	**604**
Existing Use: General Office							
Passenger Cars:	50	7	57	9	45	54	408
Total Truck Trips (PCE):	0	0	0	0	0	0	0
Total Trips (PCE)	**50**	**7**	**57**	**9**	**45**	**54**	**408**
Variance							
Passenger Cars:	-35	-6	-41	-5	-31	-36	-146
Total Truck Trips (PCE):	4	9	13	7	7	14	342
Total Trips (PCE)	**-31**	**3**	**-28**	**2**	**-24**	**-22**	**196**

4.2 PROJECT TRIP DISTRIBUTION

The Project trip distribution represents the directional orientation of traffic to and from the Project site. Trip distribution is the process of identifying the probable destinations, directions or traffic routes that will be utilized by Project traffic. The potential interaction between the planned land uses and surrounding regional access routes are considered, to identify the route where the Project traffic would distribute. The trip distribution pattern of passenger cars is heavily influenced by the geographical location of the site, the location of surrounding land uses, and the proximity to the regional freeway system.

The trip distribution pattern for truck traffic is also influenced by the local truck routes. Both Valley View Street and Katella Avenue are truck routes within the City of Cypress. Given the differences between the vehicle types, separate trip distributions were generated for both passenger cars and truck trips. Exhibits 4-1 and 4-2 show the Project truck and passenger car trip distribution patterns, respectively. Distributions of passenger cars and trucks have been determined based on traffic count data.

EXHIBIT 4-1: PROJECT (TRUCK) TRIP DISTRIBUTION

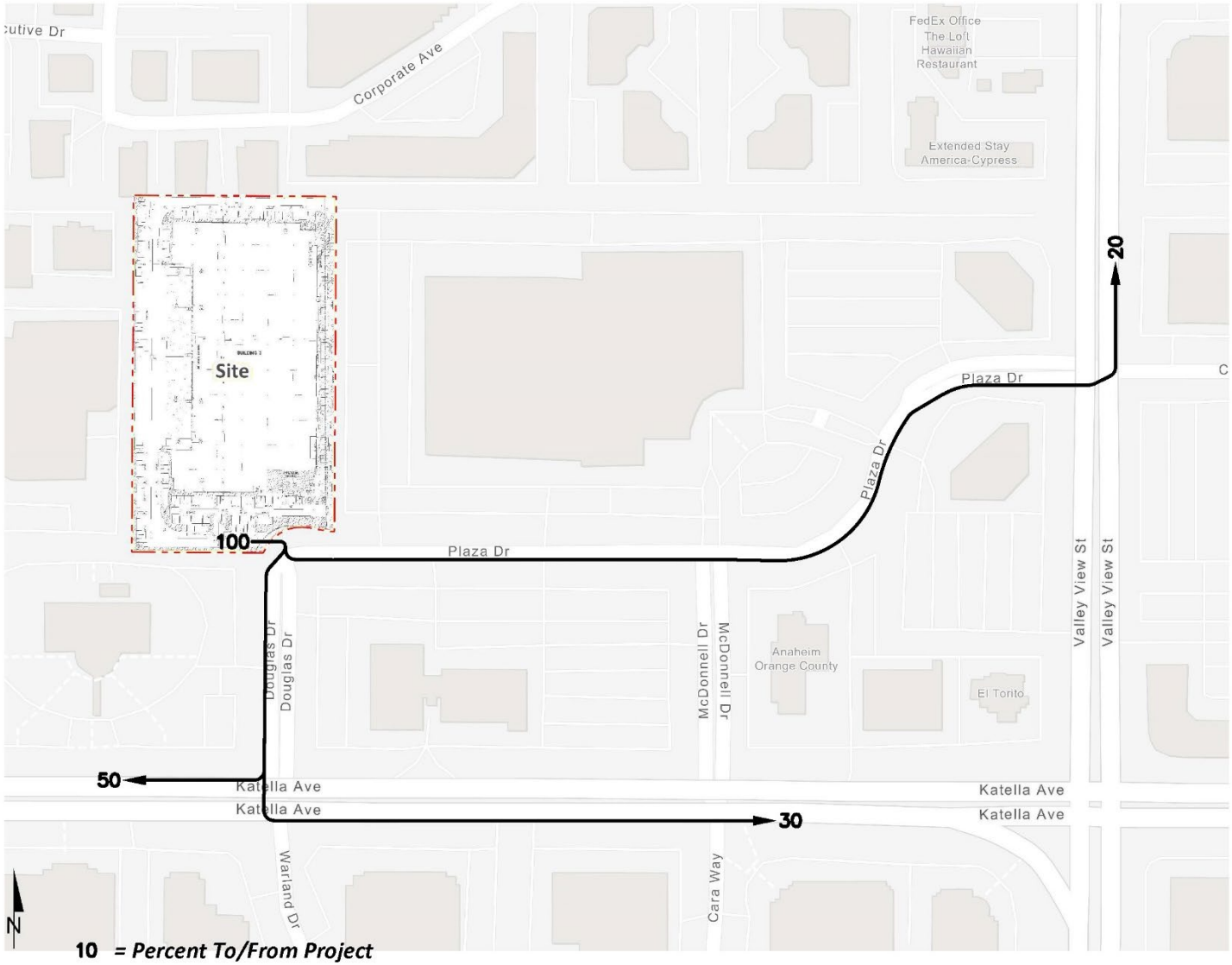
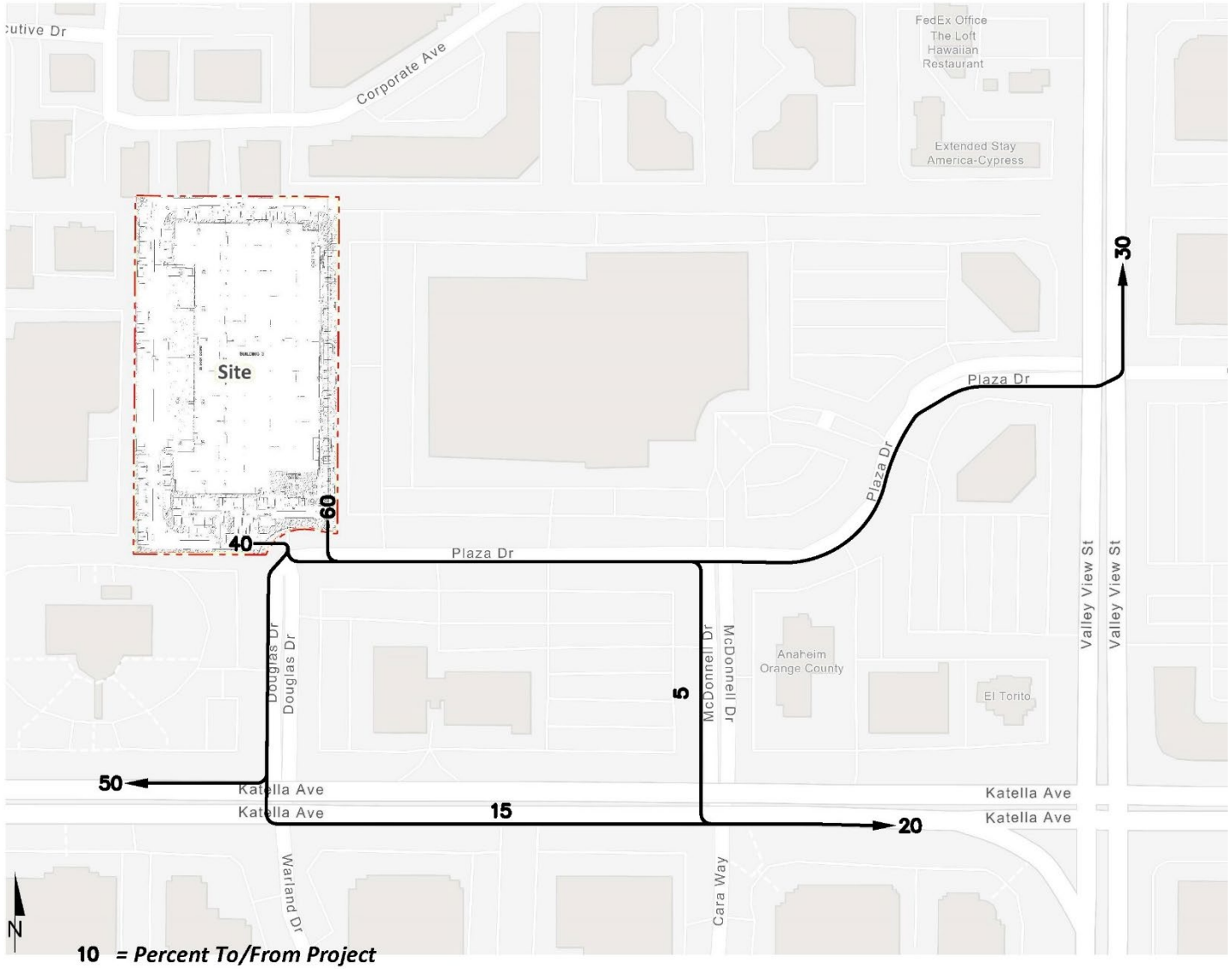


EXHIBIT 4-2: PROJECT (PASSENGER CAR) TRIP DISTRIBUTION



4.3 MODAL SPLIT

The potential for Project trips (non-truck) to be reduced by the use of public transit, walking or bicycling have not been included as part of the Project's estimated trip generation. Essentially, the Project's traffic projections are "conservative" in that these alternative travel modes would reduce the forecasted traffic volumes.

4.4 PROJECT TRIP ASSIGNMENT

The assignment of traffic from the Project area to the adjoining roadway system is based upon the Project trip generation, trip distribution, and the arterial highway and local street system improvements that would be in place by the time of initial occupancy of the Project. Based on the identified Project traffic generation and trip distribution patterns, the Project only ADT and peak hour intersection turning movement volumes are shown on Exhibit 4-3.

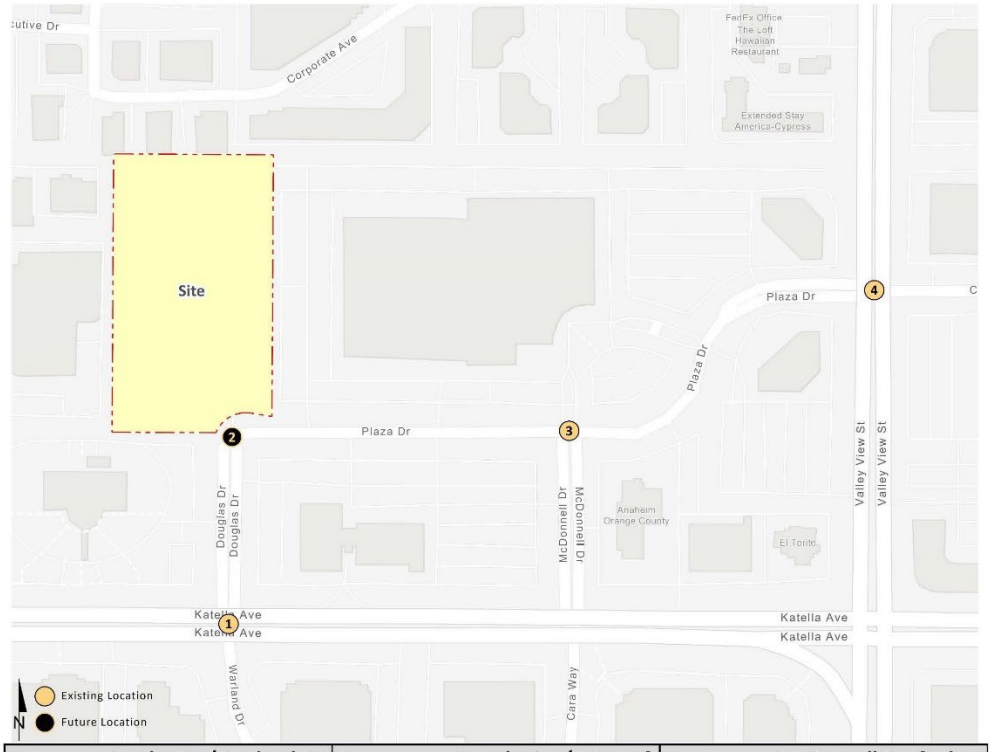
4.5 BACKGROUND TRAFFIC

Future year traffic forecasts have been based upon background (ambient) growth at 2% per year, compounded annually, for 2025 conditions. The total ambient growth is 4.04% for 2025 traffic conditions (compounded growth of 2 percent per year over 2 years or $1.02^{2\ years}$). The ambient growth factor is intended to approximate regional traffic growth. This ambient growth rate is added to existing traffic volumes to account for area-wide growth not reflected by cumulative development projects. Ambient growth has been added to daily and peak hour traffic volumes on surrounding roadways, in addition to traffic generated by the development of future projects that have been approved but not yet built and/or for which development applications have been filed and are under consideration by governing agencies.

4.6 CUMULATIVE DEVELOPMENT TRAFFIC

A cumulative project list was developed for the purposes of this analysis through consultation with planning and engineering staff from the City. The cumulative project list includes known and foreseeable projects that are anticipated to contribute traffic to the study area intersections. For the purposes of this analysis, the cumulative projects that were determined to affect one or more of the study area intersections are shown on Exhibit 4-4, listed in Table 4-5, and have been considered for inclusion. Any additional traffic generated by other projects not on the cumulative projects list is likely accounted for through background ambient growth factors that have been applied to the peak hour volumes at study area intersections as discussed in Section 4.5 *Background Traffic*. Cumulative development projects are shown in Exhibit 4-4 and listed in Table 4-5. Cumulative Only ADT and peak hour intersection turning movement volumes are shown on Exhibit 4-5. Table 4-6 summarizes the tri generation for each of the cumulative development projects.

EXHIBIT 4-3: PROJECT ONLY TRAFFIC VOLUMES (PCE)



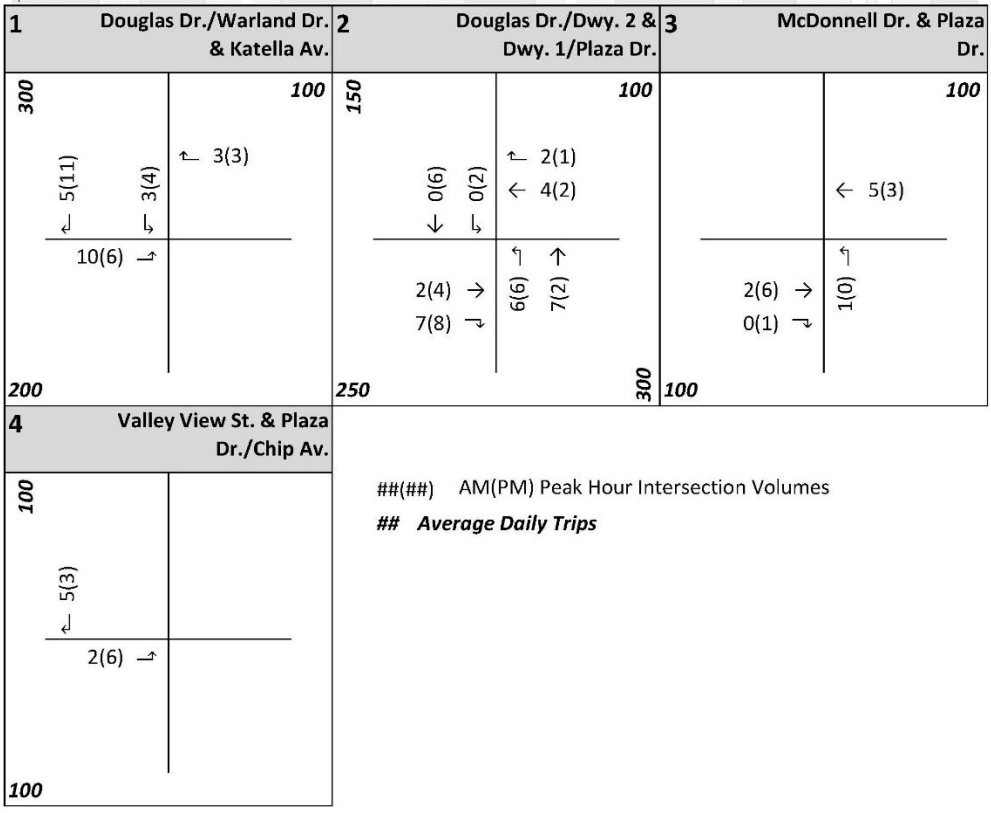


EXHIBIT 4-4: CUMULATIVE DEVELOPMENT LOCATION MAP

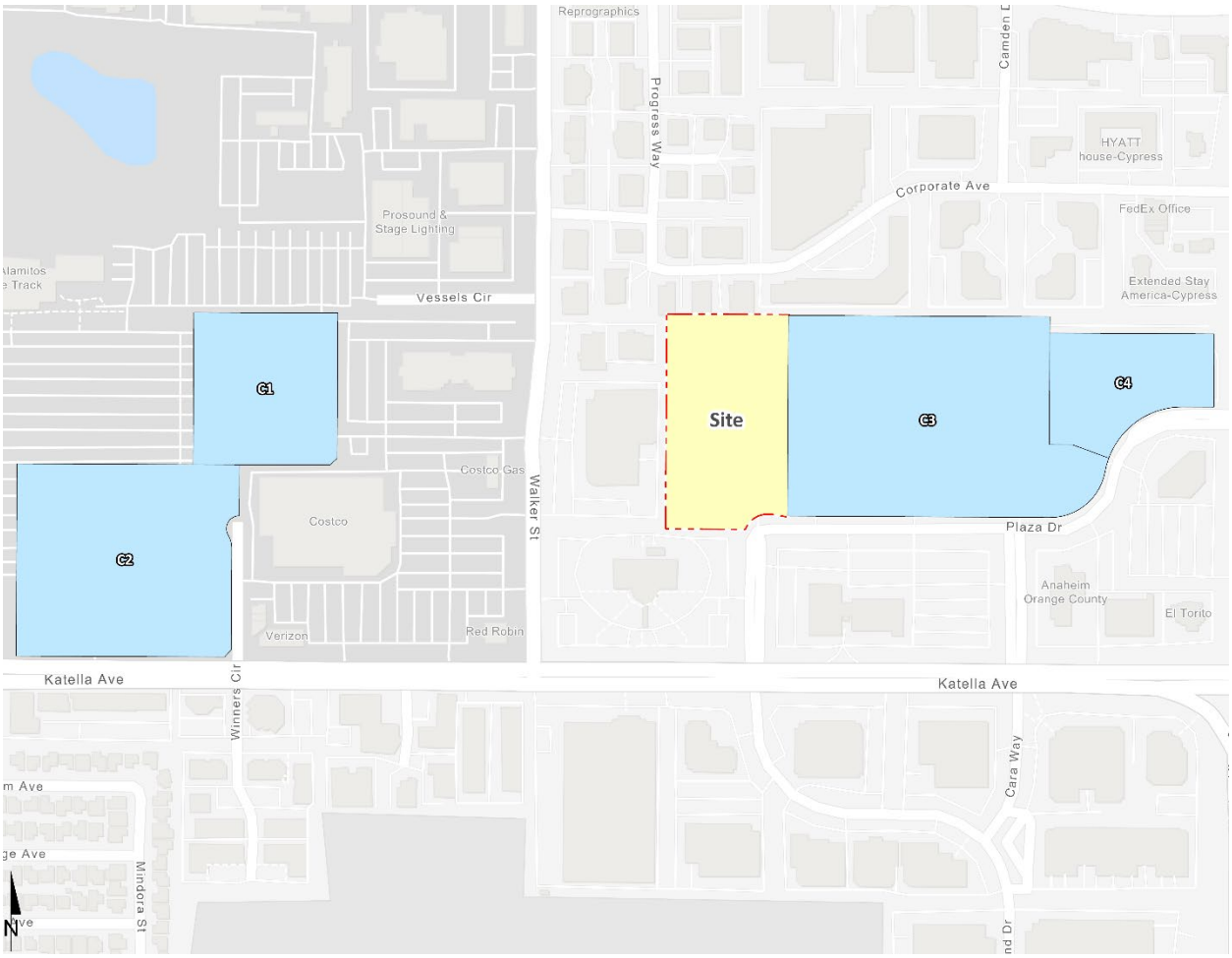
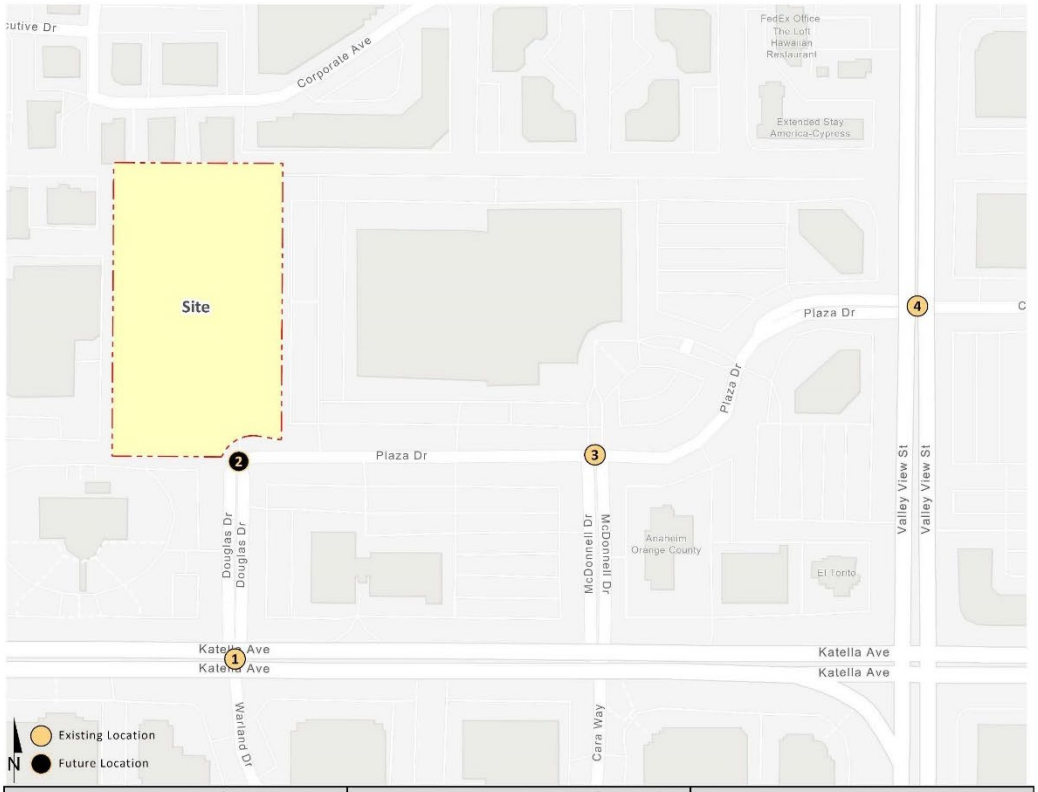


EXHIBIT 4-5: CUMULATIVE ONLY TRAFFIC VOLUMES (PCE)



1 Douglas Dr./Warland Dr. & Katella Av.

250 | 2,150
7(21) ↲ | ← 32(83)
21(7) ⇁
58(62) →
2,450

2 Douglas Dr./Dwy. 2 & Dwy. 1/Plaza Dr.

100 | 250
0(4) ↓ | 0(3) ↳ | ↼ 3(1)
↰ 7(17)
4(1) ↑ | 17(5) ↱
200 | 100

3 McDonnell Dr. & Plaza Dr.

150 | 450
0(1) ↓ | 1(7) ↳ | ↱ 6(2) | ← 14(19) | ↰ 6(32)
23(14) →
1(0) ↑ | 35(7) ↱
350

4 Valley View St. & Plaza Dr./Chip Av.

1,050 | 550
54(13) ↲ | 7(18) ↓
12(51) ⇁
12(39) ↲
↰ 40(12) | ↑ 10(15)
850 | 350

##(##) AM(PM) Peak Hour Intersection Volumes

Average Daily Trips

TABLE 4-5: CUMULATIVE DEVELOPMENT LAND USE SUMMARY

No.	Project Name	Land Use[1]	Quantity Units[2]
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

[1] TSF = Thousand Square Feet; DU = Dwelling Units

TABLE 4-6: CUMULATIVE DEVELOPMENT TRIP GENERATION SUMMARY

	AM Peak Hour			PM Peak Hour			
Land Use	In	Out	Total	In	Out	Total	Daily
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
Total	**257**	**181**	**438**	**267**	**337**	**604**	**8,057**

4.7 NEAR-TERM TRAFFIC CONDITIONS

The "buildup" approach combines existing traffic counts with a background ambient growth factor to forecast Future Year (2025) traffic conditions. An ambient growth factor accounts for background (area-wide) traffic increases that occur over time up to the year 2025 from the year 2023. Traffic volumes generated by the Project are then added to assess the near-term traffic conditions. The 2025 roadway network is similar to the Existing conditions roadway network, with the exception of future driveways proposed to be developed by the Project. The near-term traffic analysis includes the following traffic conditions, with the various traffic components:

- Future Year (2025) Without Project
  - Existing 2022 counts + Adjustment (30% for existing offices, and 2% overall to reflect 2023)
  - Ambient growth traffic (4.04%)
  - Cumulative Development traffic
- Future Year (2025) With Project
  - Existing 2022 counts + Adjustment (30% for existing offices, and 2% overall to reflect 2023)
  - Ambient growth traffic (4.04%)
  - Cumulative Development traffic
  - Project traffic

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5 E+P TRAFFIC CONDITIONS

This section discusses the traffic forecasts for E+P conditions and the resulting intersection operations and traffic signal warrant analyses.

5.1 ROADWAY IMPROVEMENTS

The lane configurations and traffic controls assumed to be in place for E+P conditions are consistent with those shown previously on Exhibit 3-1, with the exception of the following:

- Project driveways and those facilities assumed to be constructed by the Project to provide site access are also assumed to be in place for E+P conditions only (e.g., intersection and roadway improvements at the Project's frontage and driveways).

5.2 E+P TRAFFIC VOLUME FORECASTS

This scenario includes Existing traffic volumes plus Project traffic. The weekday ADT and weekday peak hour intersection turning movement volumes which can be expected for E+P traffic conditions are shown on Exhibit 5-1.

5.3 INTERSECTION OPERATIONS ANALYSIS

E+P peak hour traffic operations have been evaluated for the study area intersections based on the analysis methodologies presented in Section 2 *Methodologies* of this TA. The intersection analysis results are summarized on Table 5-1 for E+P traffic conditions, which indicate that all of the study area intersections are anticipated to continue to operate at an acceptable LOS under E+P traffic conditions, consistent with Existing (2023) traffic conditions. The intersection operations analysis worksheets for E+P traffic conditions are included in Appendix 5.1 of this TA.

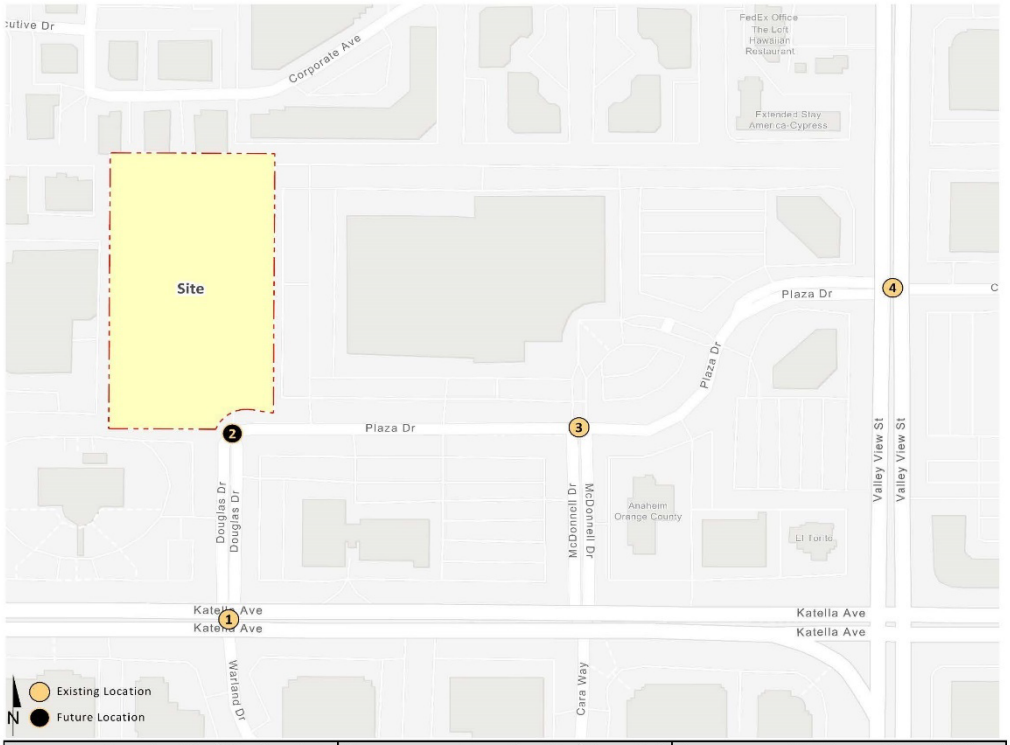
5.4 TRAFFIC SIGNAL WARRANTS ANALYSIS

The traffic signal warrant analysis for E+P traffic conditions is based on the peak hour volume-based traffic signal warrants. No study area intersections are anticipated to meet peak hour volume-based warrants with the addition of Project traffic (see Appendix 5.2).

5.5 NEAR-TERM DEFICIENCIES AND IMPROVEMENTS

All study area intersections are anticipated to continue to operate at an acceptable LOS during the AM and PM peak hours under E+P traffic conditions and below the City's thresholds for change in delay and V/C (see Table 5-1). As such, no improvements, aside from those that are needed to facilitate site access, have been identified for E+P traffic conditions.

EXHIBIT 5-1: E+P TRAFFIC VOLUMES (PCE)



1 Douglas Dr./Warland Dr. & Katella Av.

								40,050
1,300								
	20(58)	1(2)	5(30)			↱	37(9)	
						←	1782(1608)	
	↲	↓	↳			↰	12(9)	
	37(17)	→		↰	↑	↱		
	1702(1963)	→		26(83)	2(1)	5(7)		
	72(32)	↴						
43,200								1,450

2 Douglas Dr./Dwy. 2 & Dwy. 1/Plaza Dr.

								1,500
150								
	0(6)	0(2)				↱	2(1)	
						←	4(2)	
	↓	↳				↰	53(100)	
	2(4)	→		↰	↑	↱		
	7(8)	↴		6(6)	7(2)	21(24)		
250								1,650

3 McDonnell Dr. & Plaza Dr.

								900
Nominal								
	0(3)					↱	4(0)	
						←	109(83)	
	↓					↰	8(11)	
	25(92)	→		↰	↑	↱		
	0(3)	↴		20(5)	2(0)	77(9)		
2,050								350

4 Valley View St. & Plaza Dr./Chip Av.

								6,750
42,200								
	159(26)	1551(1503)	254(52)			↱	39(355)	
						←	0(30)	
	↲	↓	↳			↰	12(162)	
	11(174)	→		↰	↑	↱		
	9(0)	→		22(4)	1516(1967)	181(12)		
	15(61)	↴						
3,300								41,150

##(##) AM(PM) Peak Hour Intersection Volumes

Average Daily Trips

TABLE 5-1: INTERSECTION ANALYSIS FOR E+P CONDITIONS

#	Intersection	Traffic Control[3]	Existing								Existing plus Project								Net Change in Delay/ICU			
			Delay[1] (secs.)		Level of Service		ICU[2] (V/C)		Level of Service		Delay[1] (secs.)		Level of Service		ICU[2] (V/C)		Level of Service		Delay[1] (secs.)		ICU[2] (V/C)	
			AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
1	Douglas Dr./Warland Dr. & Katella Av.	TS	5.4	8.2	A	A	0.439	0.517	A	A	6.0	8.7	A	A	0.448	0.523	A	A	0.6	0.5	0.009	0.006
2	Douglas Dr./Dwy. 2 & Dwy. 1/Plaza Dr.	AWS	7.2	7.7	A	A	--	--	--	--	7.2	7.7	A	A	--	--			0.0	0.0	--	--
3	Existing Driveway/McDonnell Dr. & Plaza Dr.	CSS	9.2	10.8	A	B	--	--	--	--	9.2	10.9	A	B	--	--			0.0	0.1	--	--
4	Valley View St. & Plaza Dr./Chip Av.	TS	15.4	35.7	B	D	0.560	0.794	A	C	15.5	36.1	B	D	0.562	0.797	A	C	0.1	0.4	0.002	0.003

[1] Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown. HCM delay reported in seconds.

[2] ICU reported as a volume-to-capacity ratio and for signalized intersections only. ICU not applicable to unsignalized inspections.

[3] TS = Traffic Signal; AWS = All-Way Stop; CSS = Cross-Street Stop

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6 FUTURE YEAR (2025) TRAFFIC CONDITIONS

This section discusses the traffic forecasts for Future Year (2025) conditions and the resulting intersection operations and traffic signal warrant analyses.

6.1 ROADWAY IMPROVEMENTS

The lane configurations and traffic controls assumed to be in place for Future Year (2025) conditions are consistent with those shown previously on Exhibit 3-1, with the exception of the following:

- Project driveways and those facilities assumed to be constructed by the Project to provide site access are also assumed to be in place for Future Year (2025) conditions only (e.g., intersection and roadway improvements at the Project's frontage and driveways).
- Driveways and those facilities assumed to be constructed by cumulative developments to provide site access are also assumed to be in place for Future Year (2025) conditions only (e.g., intersection and roadway improvements along the cumulative development's frontages).

6.2 WITHOUT PROJECT TRAFFIC VOLUME FORECASTS

This scenario includes Existing (2023) traffic volumes plus an ambient growth factor of 4.04% and traffic from pending and approved cumulative development projects. The weekday ADT volumes and peak hour volumes which can be expected for Future Year (2025) Without Project traffic conditions are shown on Exhibit 6-1.

6.3 WITH PROJECT TRAFFIC VOLUME FORECASTS

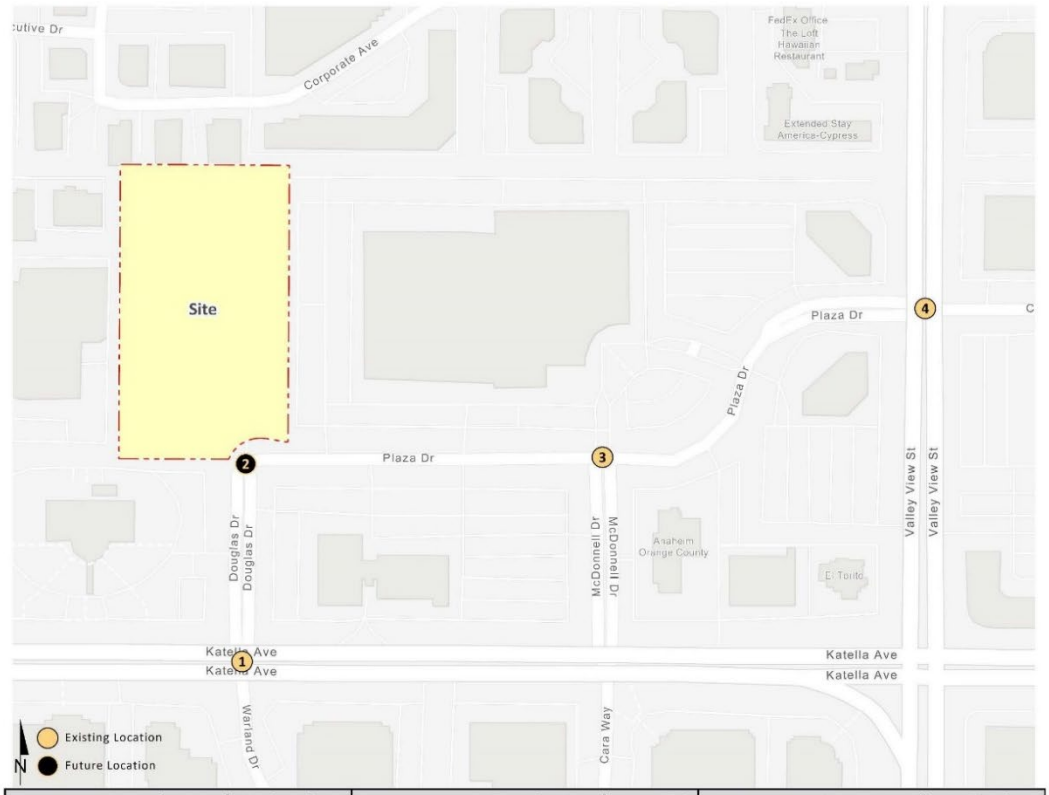
This scenario includes Existing (2023) traffic volumes plus an ambient growth factor of 4.04%, traffic from pending and approved cumulative development projects, and the addition of Project traffic. The weekday ADT volumes and peak hour volumes which can be expected for Future Year (2025) With Project traffic conditions are shown on Exhibit 6-2. Traffic volumes on the north leg of Driveway 1/Douglas Drive and Driveway 2/Plaza Drive include the traffic associated with the adjacent cumulative project.

6.4 INTERSECTION OPERATIONS ANALYSIS

Future Year (2025) peak hour traffic operations have been evaluated for the study area intersections based on the analysis methodologies presented in Section 2 *Methodologies* of this TA. The intersection analysis results are summarized on Table 6-1 for Future Year traffic conditions, which indicate the study area intersections are anticipated to continue to operate at an acceptable LOS under Future Year (2025) Without and With Project traffic conditions. The intersection operations analysis worksheets for Future Year (2025) Without and With Project traffic conditions are included in Appendix 6.1 and Appendix 6.2 of this TA, respectively.

Install a new southbound signal head on the northwest corner of Douglas Drive/Warland Drive at Katella Avenue for southbound approach vehicles in order to display the signal indication should a truck in the southbound lanes obstruct the existing signal heads on the mast arm. The new signal head will be installed on the existing pole on the northwest corner.

EXHIBIT 6-1: FUTURE YEAR (2025) WITHOUT PROJECT TRAFFIC VOLUMES (PCE)



1 Douglas Dr./Warland Dr. & Katella Av.

1,350 | 43,750

22(69) ↲	1(2) ↓	2(27) ↳
49(18) →		
1828(2104) →		
74(33) ↲		

↰ 35(6)		
← 1886(1755)		
↰ 12(9)		
↰ 27(86)	↑ 2(1)	↱ 5(7)

47,150 | 1,500

2 Douglas Dr./Dwy. 2 & Dwy. 1/Plaza Dr.

100 | 1,650

0(4) ↓	0(3) ↳
↰ 62(121)	

↰ 3(1)		
↑ 4(1)	↱ 39(29)	

200 | 1,500

3 McDonnell Dr. & Plaza Dr.

200 | 1,300

0(4) ↓	1(7) ↳
46(103) →	
0(2) ↲	

↰ 10(2)		
← 122(102)		
↰ 14(43)		
↰ 20(5)	↑ 3(0)	↱ 115(16)

2,300 | 350

4 Valley View St. & Plaza Dr./Chip Av.

44,800 | 7,600

214(37) ↲	1620(1582) ↓	264(54) ↳
21(226) →		
9(0) →		
27(102) ↲		

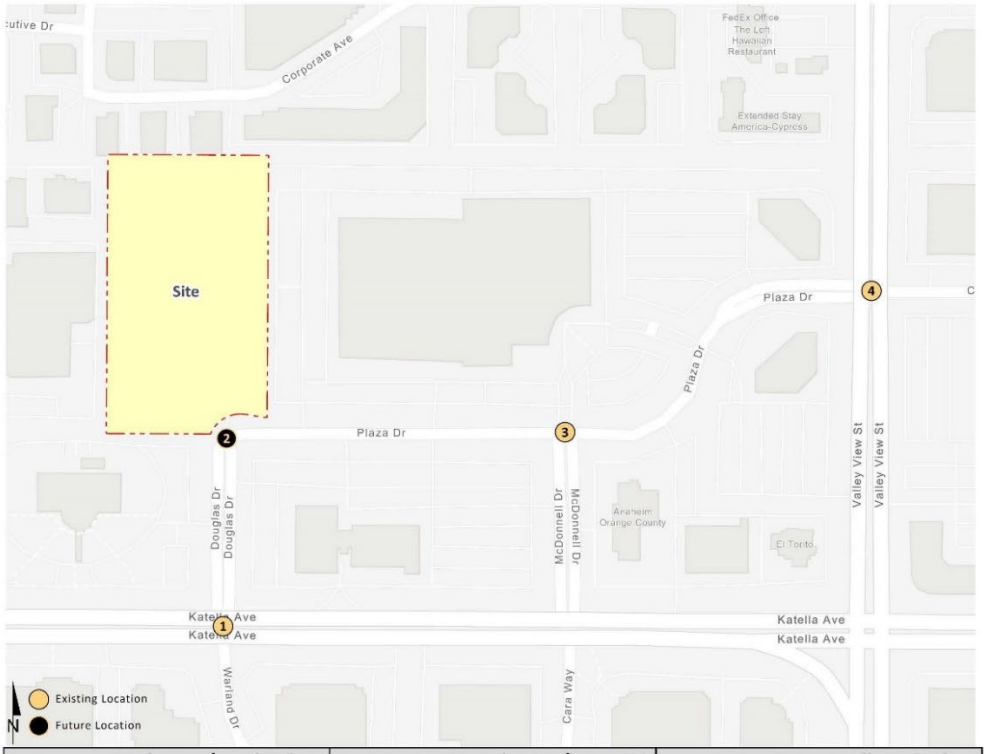
↰ 40(369)		
← 0(31)		
↰ 12(169)		
↰ 62(16)	↑ 1587(2061)	↱ 188(12)

4,150 | 43,150

##(##) AM(PM) Peak Hour Intersection Volumes

Average Daily Trips

EXHIBIT 6-2: FUTURE YEAR (2025) WITH PROJECT TRAFFIC VOLUMES (PCE)



1 Douglas Dr./Warland Dr. & Katella Av.

1,600 | 43,850

27(80) ↲	1(2) ↓	5(31) ↳
59(24) ↳		
1828(2104) →		
74(33) ↲		

↱ 38(9)		
← 1886(1755)		
↰ 12(9)		
↰	↑	↱
27(86)	2(1)	5(7)

47,350 | 1,500

2 Douglas Dr./Dwy. 2 & Dwy. 1/Plaza Dr.

300 | 1,800

0(10) ↓	0(5) ↳
2(4) →	
7(8) ↲	

↱ 5(2)		
← 4(2)		
↰ 62(121)		
↰	↑	↱
6(6)	11(3)	39(29)

450 | 1,800

3 McDonnell Dr. & Plaza Dr.

150 | 1,400

0(1) ↓	1(7) ↳
48(109) →	
0(3) ↲	

↱ 6(2)		
← 127(105)		
↰ 14(43)		
↰	↑	↱
21(5)	3(0)	115(16)

2,450 | 350

4 Valley View St. & Plaza Dr./Chip Av.

44,950 | 7,600

219(40) ↲	1620(1582) ↓	264(54) ↳
23(232) ↳		
9(0) →		
27(102) ↲		

↱ 40(369)		
← 0(31)		
↰ 12(169)		
↰	↑	↱
62(16)	1587(2061)	188(12)

4,250 | 43,150

##(##) AM(PM) Peak Hour Intersection Volumes

***Average Daily Trips***

TABLE 6-1: INTERSECTION ANALYSIS FOR FUTURE YEAR (2025) CONDITIONS

			2025 Without Project								2025 With Project								Net Change in Delay/ICU			
			Delay[1] (secs.)		Level of Service		ICU[2] (V/C)		Level of Service		Delay[1] (secs.)		Level of Service		ICU[2] (V/C)		Level of Service		Delay[1] (secs.)		ICU[2] (V/C)	
#	Intersection	Traffic Control[3]	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
1	Douglas Dr./Warland Dr. & Katella Av.	TS	6.8	9.4	A	A	0.477	0.559	A	A	7.7	9.8	A	A	0.486	0.565	A	A	0.9	0.4	0.009	0.006
2	Douglas Dr./Dwy. 2 & Dwy. 1/Plaza Dr.	AWS	7.2	7.8	A	A	--	--	--	--	7.3	7.9	A	A	--	--	--	--	0.1	0.1	--	--
3	Existing Driveway/McDonnell Dr. & Plaza Dr.	CSS	10.9	12.0	B	B	--	--	--	--	10.9	11.9	B	B	--	--	--	--	0.0	-0.1	--	--
4	Valley View St. & Plaza Dr./Chip Av.	TS	18.6	45.7	B	D	0.582	0.856	A	D	18.7	46.8	B	D	0.582	0.860	A	D	0.1	1.1	0.000	0.004

[1] Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown. HCM delay reported in seconds.

[2] ICU reported as a volume-to-capacity ratio and for signalized intersections only. ICU not applicable to unsignalized inspections.

[3] TS = Traffic Signal; AWS = All-Way Stop; CSS = Cross-Street Stop

6.5 TRAFFIC SIGNAL WARRANTS ANALYSIS

The traffic signal warrant analysis for Future Year (2025) traffic conditions are based on the peak hour volume-based traffic signal warrants. There are no study area intersections anticipated to meet traffic signal warrants for both Future Year (2025) Without and With Project traffic conditions (see Appendix 6.3 and Appendix 6.4, respectively).

6.6 PROJECT DEFICIENCIES AND RECOMMENDED IMPROVEMENTS

This section provides a summary of Project deficiencies and recommended improvements. There are no study area intersections anticipated to operate at an unacceptable LOS under Future Year (2025) traffic conditions and below the City's thresholds for change in delay and V/C (see Table 6-1). However, a new southbound signal head on the northwest corner of Douglas Drive/Warland Drive at Katella Avenue for southbound approach vehicles is recommended. The new signal head will be installed on the existing pole on the northwest corner. The purpose of the new signal head is to display the signal indication should a truck in the southbound lanes obstruct the existing signal heads on the mast arm.

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7 LOCAL AND REGIONAL FUNDING MECHANISMS

Transportation improvements within the City of Cypress are funded through a combination of project mitigation, development impact fee programs and/or fair share contributions, such as the City of Cypress Development Impact Fee (DIF) program. Identification and timing of needed improvements is generally determined through local jurisdictions based upon a variety of factors.

7.1 DEVELOPMENT IMPACT FEE PROGRAM

Per the City of Cypress Master Fee Schedule Resolution No. 6118 (adopted March 8, 2010), the Project is subject to pay a City-wide Traffic Improvement Fee of $0.65 per square foot and a Regional Traffic Improvement Fee of $0.06 per square foot (for light industrial development). These Development Impact Fees (DIF) are collected from new residential, commercial, and industrial development for the purpose of funding roadway and intersection improvements necessary to accommodate City growth as identified in the City's General Plan Circulation Element. The Project's transportation impacts fee calculations are shown on Table 7-1.

TABLE 7-1: ESTIMATED FEE OBLIGATION

Fee	Land Use Category	Unit Cost	Project Units	Fee
City-Wide Traffic Improvement Fee	Light Industrial	$0.65	191,394 SF	$124,406.10
Regional Traffic Improvement Fee	Light Industrial	$0.06	191,394 SF	$11,483.64
Total				**$135,889.74**

Note: Rates adopted March 8, 2010.

The Project Applicant will be subject to the City's DIF fee program and will pay the requisite City DIF fees at the rates then in effect pursuant to the City's ordinance. The Project Applicant's payment of the requisite DIF at the rates then in effect, pursuant to the City DIF Program, would satisfy the Project's proportional contribution at potentially affected DIF-funded facilities.

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8 REFERENCES

1. **City of Cypress.** *Transportation Operational Assessment (Level-Of-Service Traffic Study) Guidelines.* City of Cypress : s.n., April 2023.
2. **Institute of Transportation Engineers.** *Trip Generation Manual.* 11th Edition. 2021.
3. **Orange County Transportation Authority.** *2021 Orange county Congestion Management Program Report.* County of Orange : s.n., November 2021.
4. **Transportation Research Board.** *Highway Capacity Manual (HCM).* 6th Edition. s.l. : National Academy of Sciences, 2016.
5. **California Department of Transportation.** California Manual on Uniform Traffic Control Devices (CA MUTCD). [book auth.] California Department of Transportation. *California Manual on Uniform Traffic Control Devices (CA MUTCD).* 2014, Updated March 30, 2021 (Revision 6).

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APPENDIX 1.1: APPROVED TRAFFIC STUDY SCOPING AGREEMENT

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City of CYPRESS

Attachment A

TRANSPORTATION ASSESSMENT SCOPING FORM

This Transportation Assessment Scoping Form acknowledges that the transportation assessment for the following project will be prepared in accordance with the latest version of City's Transportation Operational Assessment Guidelines. **The completed form must be submitted via the City's online portal at:** https://cypressca.viewpointcloud.com/categories/1092/record-types/6520

Project Name: Goodman Commerce Center

Project Address: 5665 Plaza Drive

Project Description: 191,394 square feet of warehouse use

Project Trip Generation Rate(s): ITE 11th Edition / Other ITE 11th Edition, Code 157

The project trip generation table with a summary of the proposed and existing land uses, ITE trip rates and forecast morning and afternoon peak hour trips are attached.

	IN	OUT	TOTAL
Net AM Trips	-31	+3	-28
Net PM Trips	+2	-24	-22

TOTAL Net Daily Trips +196

Net Change in PCE

Trip Generation Adjustments: Exact amount of credit subject to acceptance by the City of Cypress Traffic Engineer.

	Yes (% applied)	No	Existing/Prior Use Counts Collected?
Existing/Prior Active Land Use	25% occupied		Yes [No]
Internal Trip Capture		X	
Pass-By Trip		X	

Project Geographic Distribution: N 30 C 20 T % S 0 % E 20 C 30 T % W 50 C 50 T %

Attach graphic illustrating project trip distribution (inbound and outbound) percentages at the studied intersections.

Project Buildout Year: 2025 **Ambient Growth Rate**: 2.0 % Per Yr.

Related Projects: To be researched by the consultant. The related projects trip generation table and map are attached as part of the TAS.

Proposed Study Intersections: (May be subject to revision after initial impact analysis.)

1. Douglas Dr. & Katella Av.	4. Valley View St. & Plaza Dr.
2. Douglas Dr./Dwy. 2 & Dwy. 1/Plaza Dr.	5.
3 McDonnell Dr./Cara Way & Plaza Dr.	6.

Other Analysis/Assumptions or Exceptions:

See Special Issues of attached Scoping Memo

Consultant Name: Charlene So, Urban Crossroads, Inc.

Phone: 949-861-0177

E-Mail: cso@urbanxroads.com

Submitted by: Charlene So 08/17/2023

Consultant Signature / Date

MEMORANDUM

URBAN | CROSSROADS

DATE: August 17, 2023
TO: Dave Roseman, City of Cypress
FROM: Charlene So, Urban Crossroads, Inc.
JOB NO: 15593-01 TA Scope

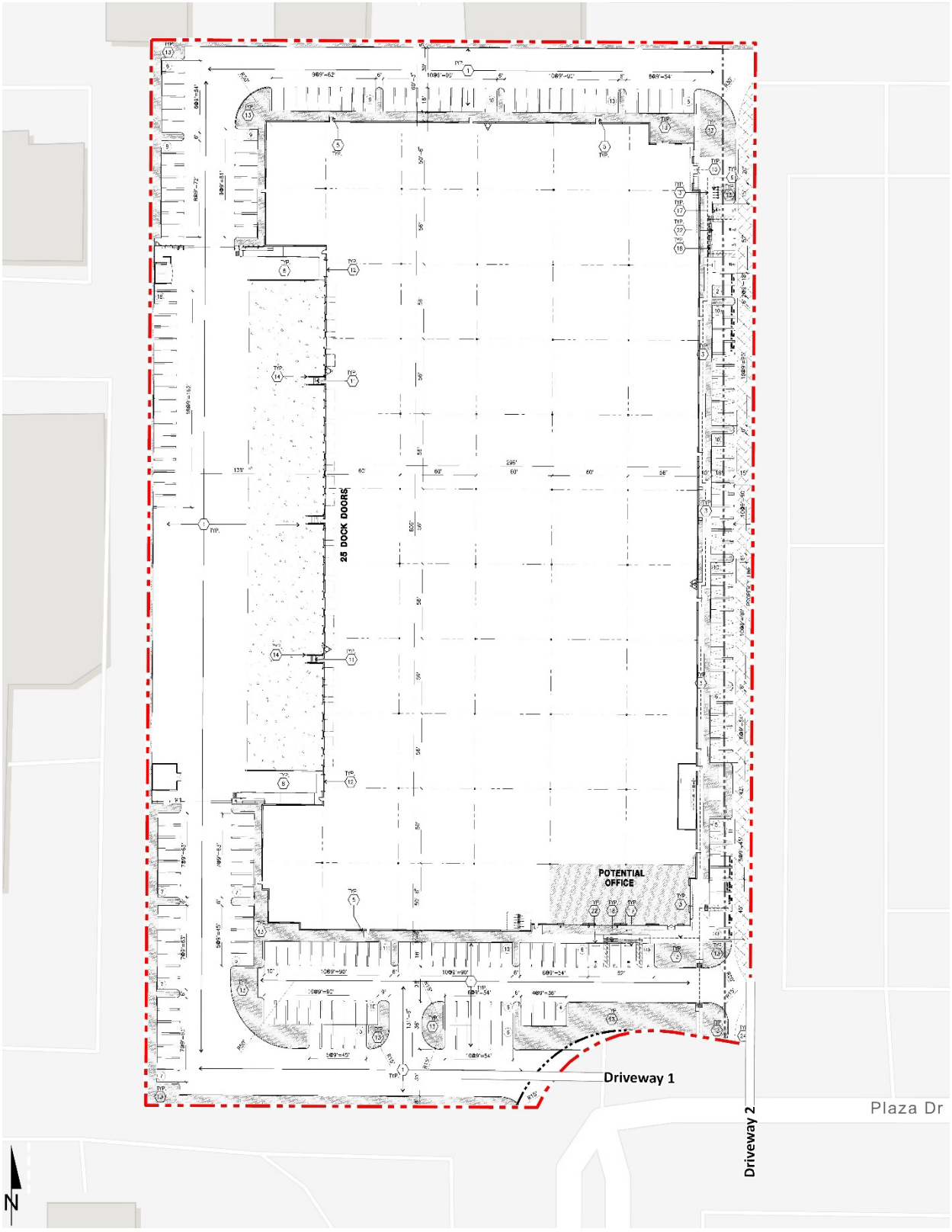
GOODMAN COMMERCE CENTER TRAFFIC ANALYSIS SCOPING AGREEMENT (REVISED)

Urban Crossroads, Inc. is pleased to submit this scoping letter to City of Cypress for the proposed Goodman Commerce Center development (**Project**), which is located at 5665 Plaza Drive in the City of Cypress. This letter describes the draft proposed Project trip generation, trip distribution, and analysis methodology, which have been used to establish the proposed Project study area and analysis locations. The purpose of this work effort is to determine whether additional traffic analysis is necessary for the proposed Project based on the City of Cypress's Transportation Operational Assessment (Level of Service Traffic Study) Guidelines (April 2023) (**City Guidelines**). Our goal is to obtain comments from City of Cypress staff, to ensure that the traffic study fully addresses the potential impacts of the proposed Project.

PROPOSED PROJECT

The Project consists of the development of a 191,394 square foot warehouse building. The Traffic Study will evaluate 95,697 square feet of high-cube transload/short-term storage warehouse use and 95,697 square feet of high-cube cold storage warehouse use. A preliminary site plan for the proposed Project is shown on Exhibit 1. The Project will provide access to Plaza Drive via a new driveway within the westerly end of Plaza Drive and a shared driveway with the proposed industrial building to the east. The westerly driveway (Driveway 1) will serve passenger cars and trucks while the easterly driveway will serve passenger cars only. The Project is anticipated to have an opening year of 2025. The proposed Project will replace an existing 150,626 square foot office building.

EXHIBIT 1: PRELIMINARY SITE PLAN



TRIP GENERATION

EXISTING TRAFFIC

The proposed Project will replace an existing 150,626 square foot office building. At the time traffic counts were conducted on August 30, 2022, the office building was 41% occupied, however, in an effort to recognize that leased tenants may have been underutilizing the space, the building has been assumed to be 25% occupied. In an effort to understand the existing traffic associated with the current uses, the trip generation rates used for this analysis are based upon information collected by the Institute of Transportation Engineers (**ITE**) as provided in their Trip Generation Manual (11th Edition, 2021) for the existing general office (ITE Land Use Code 710) use (see Table 1).

General Office (ITE Land Use Code 710) has been used to calculate the trip generation for the existing 37,657 square feet of occupied office use (25% of 150,626 square feet). The trip generation summary illustrating daily, and peak hour trip generation estimates for the existing uses are shown on Table 1. As shown on Table 1, the existing use generates a total of 408 two-way trips per day with 57 AM peak hour trips and 54 PM peak hour trips.

TABLE 1: EXISTING TRIP GENERATION SUMMARY

Land Use[1]	Units[2]	ITE LU Code	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
General Office (based on average rates)	TSF	710	1.34	0.18	1.52	0.24	1.20	1.44	10.84

[1] Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Eleventh Edition (2021).

[2] TSF = thousand square feet

Land Use	Quantity	Units[1]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
General Office[2]	37.657	TSF	50	7	57	9	45	54	408

[1] TSF = Thousand Square Feet

[2] 25% of the 150,626 square foot office building was occupied in August 2022 (or 37,657 square feet).

PROPOSED PROJECT

The proposed Project consists of a single 191,394 square foot warehouse building. In order to develop the traffic characteristics of the proposed project, trip-generation statistics published in the ITE Trip Generation Manual (11th Edition, 2021) was used for the proposed Project. Table 2 summarizes the trip generation rates. For purposes of this assessment, the following land use and vehicle mix has been utilized:

- ITE land use code 157 (High-Cube Cold Storage Warehouse) has been used to derive site specific trip generation estimates for up to 191,394 square feet. High-cube cold storage warehouses include warehouses characterized by the storage and/or consolidation of manufactured goods (and to a lesser extent, raw materials) prior to their distribution to retail locations or other warehouses. High-cube cold storage warehouses are facilities typified by temperature-controlled environments for frozen food or other perishable products. The High-Cube Cold Storage Warehouse vehicle mix (passenger cars versus trucks) has been obtained from the ITE's Trip Generation Manual. The truck percentages

were further broken down by axle type per the following South Coast Air Quality Management District (**SCAQMD**) recommended truck mix: 2-Axle = 34.7%; 3-Axle = 11.0%; 4+-Axle = 54.3%.

TABLE 2: TRIP GENERATION RATES

Land Use[1]	Units[2]	ITE LU Code	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Actual Vehicle Trip Generation Rates									
High-Cube Cold Storage Warehouse[3]	TSF	157	0.085	0.025	0.110	0.034	0.086	0.120	2.120
Passenger Cars (AM-72.7%, PM-75.0%, Daily-64.6%)			0.076	0.004	0.080	0.019	0.071	0.090	1.370
2-Axle Trucks (AM-9.5%, PM-8.7%, Daily-12.3%)			0.003	0.007	0.010	0.005	0.005	0.010	0.260
3-Axle Trucks (AM-3.0%, PM-2.8%, Daily-3.9%)			0.001	0.002	0.003	0.002	0.001	0.003	0.083
4+-Axle Trucks (AM-14.8%, PM-13.6%, Daily-19.2%)			0.005	0.011	0.016	0.008	0.008	0.016	0.407
Passenger Car Equivalent (PCE) Trip Generation Rates[6]									
High-Cube Cold Storage Warehouse[3]	TSF	157	0.085	0.025	0.110	0.034	0.086	0.120	2.120
Passenger Cars			0.076	0.004	0.080	0.019	0.071	0.090	1.370
2-Axle Trucks (PCE = 1.5)			0.005	0.011	0.016	0.008	0.008	0.016	0.390
3-Axle Trucks (PCE = 2.0)			0.002	0.005	0.007	0.004	0.003	0.007	0.165
4+-Axle Trucks (PCE = 3.0)			0.015	0.034	0.049	0.024	0.025	0.049	1.222

[1] Trip Generation & Vehicle Mix Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Eleventh Edition (2021).

[2] TSF = thousand square feet

[3] Truck Mix: South Coast Air Quality Management District's (SCAQMD) recommended truck mix, by axle type.
Normalized % - With Cold Storage: 34.7% 2-Axle trucks, 11.0% 3-Axle trucks, 54.3% 4-Axle trucks.

Passenger car equivalent (**PCE**) factors were applied to the trip generation rates for heavy trucks (2-axles, 3-axles, and 4+-axles). PCEs allow the typical "real-world" mix of vehicle types to be represented as a single, standardized unit, such as the passenger car, to be used for the purposes of capacity and LOS analyses. The PCE factors are consistent with those used on other near-by projects.

The trip generation summary illustrating daily, and peak hour trip generation estimates for the proposed Project are summarized on Table 3 in actual vehicles. The proposed Project is anticipated to generate 406 two-way trips per day with 21 AM peak hour trips and 24 PM peak hour trips (actual vehicles). Intersection operations analysis for a truck-intensive project would be required to utilize the PCE trip generation consistent with the City's Guidelines. As such, the Project's trip generation in PCE is also shown on Table 3. The Project is anticipated to generate 604 two-way PCE trips per day with 29 PCE AM peak hour trips and 32 PCE PM peak hour trips.

TABLE 3: PROJECT TRIP GENERATION SUMMARY

Land Use	Quantity	Units[1]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Actual Vehicles:									
High-Cube Cold Storage Warehouse	191.394	TSF							
Passenger Cars:			15	1	16	4	14	18	262
2-axle Trucks:			1	1	2	1	1	2	50
3-axle Trucks:			0	0	0	0	0	0	16
4+-axle Trucks:			1	2	3	2	2	4	78
Total Truck Trips (Actual Vehicles):			2	3	5	3	3	6	144
Total Trips (Actual Vehicles)[2]			**17**	**4**	**21**	**7**	**17**	**24**	**406**
Passenger Car Equivalent (PCE):									
High-Cube Cold Storage Warehouse	191.394	TSF							
Passenger Cars:			15	1	16	4	14	18	262
2-axle Trucks:			1	2	3	1	2	3	76
3-axle Trucks:			0	1	1	1	0	1	32
4+-axle Trucks:			3	6	9	5	5	10	234
Total Truck Trips (PCE):			4	9	13	7	7	14	342
Total Trips (PCE)[2]			**19**	**10**	**29**	**11**	**21**	**32**	**604**

[1] TSF = Thousand Square Feet

[2] Total = Passenger Cars + Trucks

TRIP GENERATION COMPARISON

Table 4 shows the trip generation comparison between the existing and proposed use. It is our understanding that the existing warehouse/office building is currently vacant and generates only incidental vehicle trips, however, should the existing site be fully occupied, then it is anticipated there would be a net reduction in trips. The resulting net new trips are identified at the bottom of Table 4. The trip generation comparison is based on PCE as the existing and proposed uses are truck-intensive uses (any intersection operations analysis would use the PCE-based trip generation). As shown on Table 4, the Project is anticipated to generate a net increase of 196 two-way trips per day with a net reduction of 28 AM peak hour trips and net reduction of 22 PM peak hour trips (in PCE). Trip generation shown on Table 3 will be utilized for the intersection operations analyses.

TABLE 4: TRIP GENERATION COMPARISON

	AM Peak Hour			PM Peak Hour			
Land Use	In	Out	Total	In	Out	Total	Daily
Proposed Project							
Passenger Cars:	15	1	16	4	14	18	262
Total Truck Trips (PCE):	4	9	13	7	7	14	342
Total Trips (PCE)	**19**	**10**	**29**	**11**	**21**	**32**	**604**
Existing Use: General Office							
Passenger Cars:	50	7	57	9	45	54	408
Total Truck Trips (PCE):	0	0	0	0	0	0	0
Total Trips (PCE)	**50**	**7**	**57**	**9**	**45**	**54**	**408**
Variance							
Passenger Cars:	-35	-6	-41	-5	-31	-36	-146
Total Truck Trips (PCE):	4	9	13	7	7	14	342
Total Trips (PCE)	**-31**	**3**	**-28**	**2**	**-24**	**-22**	**196**

PROJECT TRIP DISTRIBUTION

Trip distribution is the process of identifying the probable destinations, directions or traffic routes that will be utilized by Project traffic. The potential interaction between the planned land uses and surrounding regional access routes are considered, to identify the route where the Project traffic would distribute. The Project trip distribution and assignment process represents the directional orientation of traffic to and from the Project site. The trip distribution pattern of passenger cars is heavily influenced by the geographical location of the site, the location of surrounding land uses, and the proximity to the regional freeway system.

The trip distribution pattern for truck traffic is also influenced by the local truck routes. Both Valley View Street and Katella Avenue are truck routes within the City of Cypress. Given the differences between the vehicle types, separate trip distributions were generated for both passenger cars and truck trips. The Project passenger car and truck trip distribution patterns are graphically depicted on Exhibits 2 and 3, respectively. Distributions of passenger cars and trucks have been determined based on traffic count data.

EXHIBIT 2: PROJECT (PASSENGER CAR) TRIP DISTRIBUTION

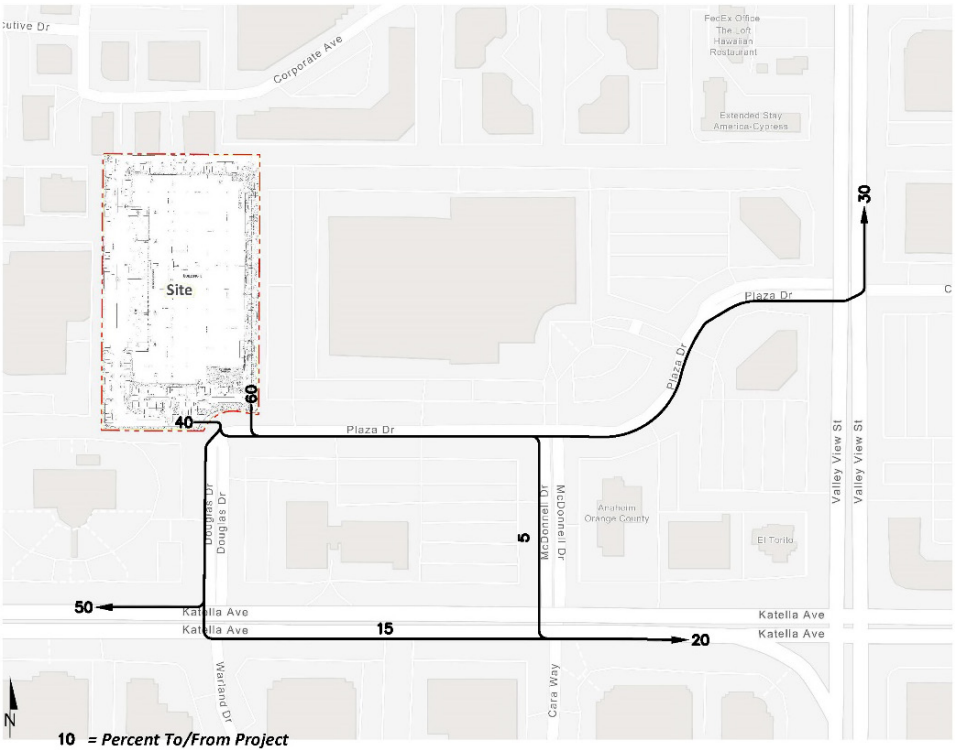
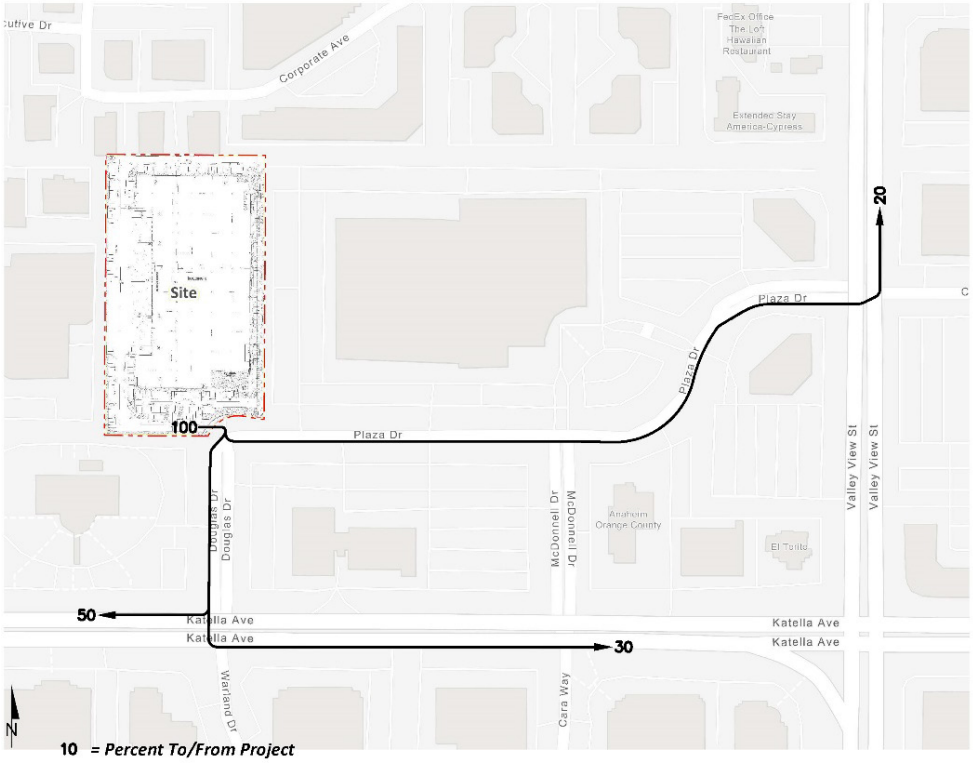


EXHIBIT 3: PROJECT (TRUCK) TRIP DISTRIBUTION



ANALYSIS SCENARIOS

Peak hour operations at each of the study area intersections and site access driveways will be assessed based on the HCM 6th Edition methodology and the ICU methodology results will be reported for signalized intersections under the following analysis scenarios:

- Existing (2023) Conditions
- Existing plus Project (E+P) Conditions
- Opening Year Cumulative (2025) Without Project Conditions: existing traffic, ambient growth, and traffic associated with the two large development projects currently under construction near the Costco
- Opening Year Cumulative (2025) With Project Conditions: existing traffic, ambient growth, traffic associated with the two large development projects currently under construction near the Costco, and proposed Project traffic

The following parameters will be utilized in determining the LOS at the study area intersections:

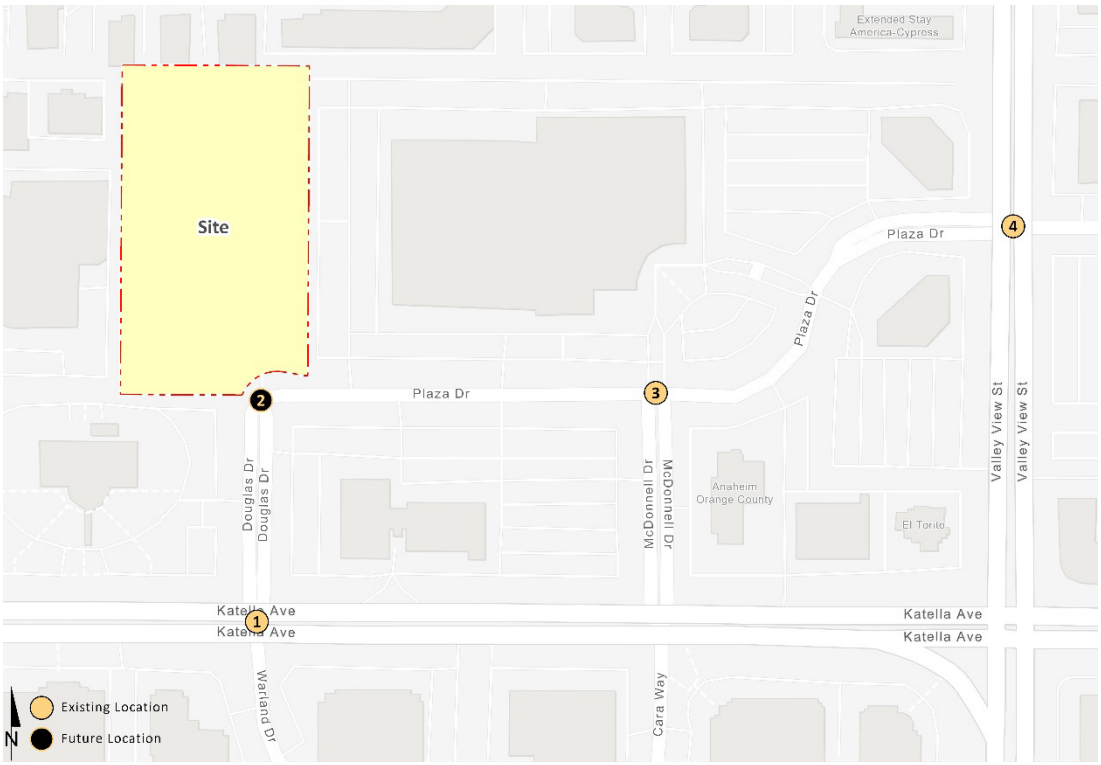
- Saturation flow rate of 1,700 vehicles per hour per lane or 2,880 vehicles per hour of green for dual-turning lanes.
- The adjustment for lost time shall be 0.05.

STUDY AREA

Based upon the Project trip generation and trip distribution patterns included as part of this letter, the proposed study area intersections are identified on Exhibit 4.

#	Intersection
1	Douglas Dr. & Katella Av.
2	Douglas Dr./Dwy. 2 & Dwy. 1/Plaza Dr.
3	McDonnell Dr./Cara Wy. & Plaza Dr.
4	Valley View St. & Plaza Dr.

EXHIBIT 4: STUDY AREA



EXISTING COUNT DATA

Traffic counts (classified by vehicle type) conducted on August 30, 2022, when local schools were in session and operating on a typical bell schedule are proposed to be utilized for the purposes of the traffic study. An adjustment factor of 2% will be applied to the 2022 traffic counts for 2023 baseline conditions. Time periods counted were from 7:00-9:00 AM and 4:00-6:00 PM and include pedestrian and bicycle counts at each analysis location. No adjustments are proposed to the new traffic counts for the baseline traffic condition as traffic counts with the exception of volume balancing that would be necessary between closely spaced intersections.

AMBIENT GROWTH

Pursuant to discussion with City staff and consistent with other studies performed in the area, an ambient growth rate of 2% per year is proposed for the study area intersection to approximate background growth not identified by nearby cumulative development projects. As such, the ambient growth used will be 4.04% (2% per year compounded over 2 years).

CUMULATIVE DEVELOPMENT PROJECTS

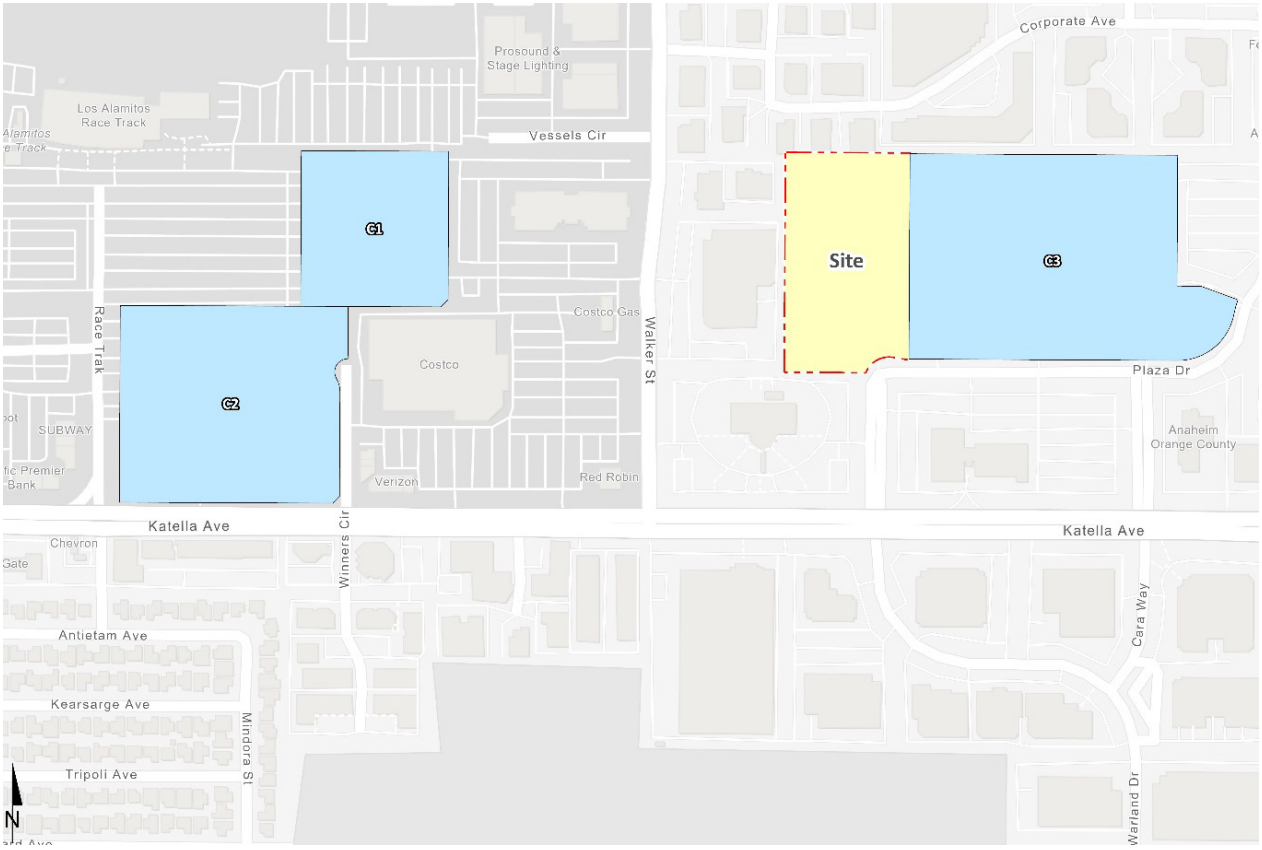
It is requested that the City provide a list of cumulative projects that need to be considered for the focused traffic analysis if there are projects that need to be included in conjunction with the ambient growth rate. A preliminary cumulative project list is provided on Table 5 and the locations are graphically shown on Exhibit 5.

TABLE 5: CUMULATIVE DEVELOPMENT LAND USE SUMMARY

No.	Project Name	Land Use[1]	Quantity	Units[2]
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

[1] TSF = Thousand Square Feet; DU = Dwelling Units

EXHIBIT 5: CUMULATIVE DEVELOPMENT PROJECT LOCATION MAP



LEVEL OF SERVICE (LOS) METHDOLOGY

The City of Cypress requires signalized intersections to be evaluated through Intersection Capacity Utilization (ICU) analysis which compares the peak hour traffic volumes to intersection capacity (v/c). The ICU methodology is not applicable to unsignalized intersections. Intersection LOS operations will also be reported based on the Highway Capacity Manual (HCM) methodology which are based on an intersection's average control delay (in seconds) for both signalized and unsignalized intersections.

LEVEL OF SERVICE (LOS) CRITERIA

The definition of an intersection deficiency has been obtained from the City's General Plan. The City of Cypress has adopted a level of service (**LOS**) D or better as the desired citywide operating standard for most City streets. However, given the influence of regional traffic on Valley View Street, Lincoln Avenue, and Katella Avenue, which are beyond the control of the City of Cypress, LOS E or better has been adopted as the minimum operating LOS for street segments and intersections on the aforementioned arterials due to the high volume of traffic carried on these roadways.

THRESHOLDS OF DEFICIENCY

For the intersections that lie within the City of Cypress, determination of whether the Project has an adverse effect on intersection operations will be based on a comparison of without and with project levels of service.

For HCM Analysis: For signalized intersections, the traffic operations deficiency shall be determined in accordance with Table 6 below:

TABLE 6: HCM SIGNALIZED INTERSECTION DEFICIENCY CRITERIA

With Project LOS	Project-Related Increase in Delay (in seconds)
C or better	> 6.0 seconds
D	> 4.0 seconds
E, F	> 2.0 seconds

To determine whether a project's added traffic would result in a deficiency at a study area unsignalized intersection in accordance with the City's HCM methodology, the following criteria shall be applied:

a) Worsens the LOS at an unsignalized intersection from LOS D or better to LOS E or F;

b) Causes an increase in the delay equal to or more than three (3.0) seconds at an unsignalized intersection that operates at LOS E or F with project.

For ICU Analysis: a deficiency at both signalized study intersections will be determined in accordance with Table 7:

TABLE 7: ICU INTERSECTION DEFICIENCY CRITERIA

Without Project LOS	With Project Volume/Capacity (V/C) Ratio	With Project Level of Service
D	>0.900 or greater	LOS E or F
Without Project LOS	With Project Volume/Capacity (V/C) Ratio	Project-Related increase in V/C
E, F	>0.900 or greater	Equal to or greater than 0.03

Improvements: Any decrease beyond the minimum acceptable LOS due to the addition of project traffic requires alternative corrective measures to return the intersection to an acceptable LOS. For intersections operating below the minimum acceptable LOS prior to the addition of project traffic, and the LOS would be worsened with the addition of project traffic, corrective measures should be identified, if feasible, to return to "without project" condition LOS or V/C (volume/capacity ratio), whichever is greater. Alternative corrective measures to roadway widening which may include the reduction of project traffic volumes through application of signal system upgrades, phasing changes, synchronization, and/or project design improvements which are expected to improve capacity and/or efficiency withing the transportation network (e.g., changes to a project's site access or internal circulation scheme) shall be identified with concurrence from the City Traffic Engineer.

SPECIAL ISSUES

The following special issues will also be addressed as part of the focused traffic analysis:

- **Traffic Signal Warrant Analysis:** Traffic signal warrant analysis will be performed for all full-access unsignalized study area intersections utilizing the California MUTCD peak-hour warrants for existing intersections, and the Caltrans daily (Planning level) warrant for new intersections.
- **Left Turn Phasing:** The Traffic Study will also assess the north/south left-turn phasing at the intersection of Douglas Drive and Katella Avenue.
- **Site Access Evaluation/Queuing Analysis:** The turn pocket lengths will be determined through peak hour traffic simulations developed using Synchro and SimTraffic software in an effort to identify the required storage capacity for turn lanes at all Project driveways on Plaza Drive.
    - Site access evaluation will also identify the number of access points, on-site stacking distance, shared access with other adjacent property, potential turn restrictions (if applicable), adequate sight distance, driveway aisle widths, and any operational characteristics.
- **Left Turn Queuing Analysis:** For any study intersection where the project is anticipated to contribute 25 or more net new trips during the AM or PM peak hour, a left-turn queuing analysis shall be prepared for the subject study intersection to evaluate the project's potential effects on queuing in the public right-of-way with respect to safety and the overall intersection operations. The queuing analysis will be based on the project's peak hour vehicular trip generation forecasts and shall be prepared based on the HCM method. The 95th percentile queue for the left-turn movement at the study intersection will need to be identified during the peak hour time periods included in the LOS analysis.

The analysis will need to identify the length of the left-turn storage and evaluate if an adequate storage area exists to accommodate the maximum forecast back of queue for the future with project condition. Proposed development projects which are expected to cause or contribute towards exclusive turn-lane queuing which spills back into adjacent travel lanes or blocks adjacent intersections should identify corrective measures to improve queue management and/or storage, if feasible. For intersections which experience excessive exclusive turn-lane queuing prior to the addition of project traffic, and the queuing would be worsened with the addition of project traffic, corrective measures shall be identified, if feasible, including measures to reduce vehicle trips.

  - The Project will be required to evaluate the peak hour queues for the southbound left turn and right turn pockets at Douglas Drive on Katella Avenue (regardless of the project-related peak hour trip contribution to these movements).

- **Truck Access:** Prepare truck turn templates at the applicable Project driveways for the appropriate turning movements to ensure driveways are designed to accommodate the turning radius of heavy trucks. Truck turns will be assessed at the driveways on Plaza Drive but also will include internal circulation identifying the truck route/access to the truck docks.
  - Truck turn templates will be provided in the Traffic Study for the intersection of Plaza Drive/Douglas Drive knuckle with the Project driveways.
  - Truck turn templates will also be applied to the intersection of Douglas Drive and Katella Avenue for the eastbound left, southbound left, and southbound right turn lanes to identify if there are any modifications necessary to the infrastructure (e.g., median, etc.) to accommodate truck turns. If the analysis finds that protected left-turn phasing is required at the intersection Douglas Drive and Katella Avenue, the truck turn templates should account for simultaneous turns from the northbound and southbound left turn lanes (or make other applicable recommendations).
- **Active Transportation Network Review:** Potential impacts to public transit, pedestrian and bicycle facilities and travel will be identified. Inventory of the pedestrian infrastructure will include within ¼ mile radius: sidewalk and widths, crosswalks, crosswalk markings, pedestrian push-button, curb access ramps, tactile warning strips, curb extensions, pedestrian amenities, pedestrian lighting. Existing bicycle facilities will be identified including bicycle parking, amenities, etc. Inventory of the existing transit lines, bus stops, transit stations/facilities will also be identified. Transit route discussion will identify the hours of service, peak period headways, route number, and service provider.
- **Safety Analysis:** A safety assessment will be conducted for the signalized study intersections. Safety review will include:
  - Collection of collision history at the intersection and near-by roadway segments to identify crash trends (obtained through Statewide Integrated Traffic Records System). If there are 5 or more accidents per year within any of the last 3 years at the intersection, in person field observations will be conducted as part of the intersection safety review.
  - In field review will include, but is not limited to: qualitative descriptions of traffic flows during the peak and off-peak time periods, documentation of repeated violations of existing restrictions, documentation of any safety concerns at the intersection for

other non-motorized users (minors/children, seniors, pedestrians, bicyclists, handicap accessible, etc.), and will propose safety improvements/corrective measures.

- Evaluate the degradation of pedestrian and bicycle facilities due to the Project.
- Evaluation of multi-model conflict points due to the Project.
- Potential for increase in vehicular speeds.
- Project driveway sight distance evaluation.
- It is our understanding that the Project will be conditioned to eliminate the gap in the sidewalk between the sidewalk on the west side of Douglas Drive to the future sidewalk along the north side of Plaza Drive.
- Due to the added truck volumes on Douglas Drive the Project is likely to be conditioned as a safety measure (to be assessed as part of the Safety Analysis) to add a southbound near-side signal indication to improve visibility of the traffic signal modifications for auto drivers.

If you have any questions or comments, I can be reached at cso@urbanxroads.com.

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APPENDIX 1.2: SITE ADJACENT QUEUES

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Intersection: 1: Douglas Dr. & Katella Av.

Movement	EB	EB	EB	EB	EB	WB	WB	WB	WB	WB	NB	NB
Directions Served	L	T	T	T	R	L	T	T	T	R	L	TR
Maximum Queue (ft)	96	413	386	305	106	47	440	396	319	163	61	21
Average Queue (ft)	35	200	175	110	13	14	218	189	139	19	18	5
95th Queue (ft)	75	363	331	249	52	42	398	369	310	88	47	18
Link Distance (ft)		785	785	785			922	922	922			367
Upstream Blk Time (%)												
Queuing Penalty (veh)												
Storage Bay Dist (ft)	250				100	250				130	115	
Storage Blk Time (%)		5		6			8		7			
Queuing Penalty (veh)		3		4			1		3			

Intersection: 1: Douglas Dr. & Katella Av.

Movement	SB	SB	SB
Directions Served	L	T	R
Maximum Queue (ft)	37	18	51
Average Queue (ft)	6	1	14
95th Queue (ft)	25	9	35
Link Distance (ft)		458	
Upstream Blk Time (%)			
Queuing Penalty (veh)			
Storage Bay Dist (ft)	90		90
Storage Blk Time (%)			
Queuing Penalty (veh)			

Intersection: 2: Douglas Dr./Driveway 1 & Driveway 2/Plaza Dr.

Movement	EB	WB	NB
Directions Served	LTR	LTR	LTR
Maximum Queue (ft)	31	55	55
Average Queue (ft)	9	30	27
95th Queue (ft)	32	48	51
Link Distance (ft)	164	191	458
Upstream Blk Time (%)			
Queuing Penalty (veh)			
Storage Bay Dist (ft)			
Storage Blk Time (%)			
Queuing Penalty (veh)			

Zone Summary

Zone wide Queuing Penalty: 11

Intersection: 1: Douglas Dr. & Katella Av.

Movement	EB	EB	EB	EB	EB	WB	WB	WB	WB	WB	NB	NB
Directions Served	L	T	T	T	R	L	T	T	T	R	L	TR
Maximum Queue (ft)	64	453	422	342	62	123	403	369	313	119	92	21
Average Queue (ft)	19	229	200	142	8	12	209	182	129	6	41	5
95th Queue (ft)	49	394	360	284	35	66	359	330	267	52	80	18
Link Distance (ft)		785	785	785			922	922	922			367
Upstream Blk Time (%)												
Queuing Penalty (veh)												
Storage Bay Dist (ft)	250				100	250				130	115	
Storage Blk Time (%)		7		9			6		5		0	
Queuing Penalty (veh)		2		3			1		0		0	

Intersection: 1: Douglas Dr. & Katella Av.

Movement	SB	SB	SB
Directions Served	L	T	R
Maximum Queue (ft)	68	6	52
Average Queue (ft)	21	1	23
95th Queue (ft)	52	7	44
Link Distance (ft)		458	
Upstream Blk Time (%)			
Queuing Penalty (veh)			
Storage Bay Dist (ft)	90		90
Storage Blk Time (%)	0		
Queuing Penalty (veh)	0		

Intersection: 2: Douglas Dr./Driveway 1 & Driveway 2/Plaza Dr.

Movement	EB	WB	NB	SB
Directions Served	LTR	LTR	LTR	LTR
Maximum Queue (ft)	31	63	54	31
Average Queue (ft)	10	37	24	10
95th Queue (ft)	34	57	48	33
Link Distance (ft)	164	191	458	176
Upstream Blk Time (%)				
Queuing Penalty (veh)				
Storage Bay Dist (ft)				
Storage Blk Time (%)				
Queuing Penalty (veh)				

Zone Summary

Zone wide Queuing Penalty: 6

APPENDIX 3.1: TRAFFIC COUNTS

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Volume Development
AM Peak Hour

1. Douglas Dr. & Katella Av.

PHF: 0.962 **7:00** Count Date: 8/30/2022

	NBL	NBT	NBR	SBL	SBT	SBR	EBL	EBT	EBR	WBL	WBT	WBR	TOTAL
Existing 2023:	17	2	5	2	1	12	27	1,653	61	9	1,684	34	3,507
2-Axle:	2	0	0	0	0	1	0	63	1	1	78	0	146
3-Axle:	0	0	0	0	0	0	0	3	2	0	13	0	18
4+-Axle:	4	0	0	0	0	1	0	7	4	1	23	0	40
2023 Trucks:	6	0	0	0	0	2	0	73	7	2	114	0	204
2023 PCE:	**26**	**2**	**5**	**2**	**1**	**15**	**27**	**1,702**	**72**	**12**	**1,782**	**34**	**3,678**
2023 ADT:		1,432			1,015			42,972			39,960		
2023 Pk-Daily:		8%			8%			8%			9%		
Project:	0	0	0	1	0	2	9	0	0	0	0	3	15
Project PCE:	0	0	0	3	0	5	10	0	0	0	0	3	21
Project ADT:		0			286			204			82		
Cumulative:	0	0	0	0	0	4	19	58	0	0	32	0	113
Cumulative PCE	0	0	0	0	0	7	21	58	0	0	32	0	118
Cumulative ADT:		0			272			2,440			2,168		
E+P:	17	2	5	3	1	14	36	1,653	61	9	1,684	37	3,522
E+P PCE:	26	2	5	5	1	20	37	1,702	72	12	1,782	37	3,699
E+P ADT:		1,432			1,301			43,176			40,042		
2025 NP:	18	2	5	2	1	16	47	1,778	63	9	1,784	35	3,762
2025 NP PCE:	27	2	5	2	1	22	49	1,828	74	12	1,886	35	3,945
2025 NP ADT:		1,490			1,328			47,148			43,743		
2025 WP:	18	2	5	3	1	18	56	1,778	63	9	1,784	38	3,777
2025 WP PCE:	27	2	5	5	1	27	59	1,828	74	12	1,886	38	3,966
2025 WP ADT:		1,490			1,614			47,352			43,825		

2. Driveway 2/Douglas Dr. & Driveway 1/Plaza Dr.

PHF: 0.864 **8:00** Count Date: 8/30/2022

	NBL	NBT	NBR	SBL	SBT	SBR	EBL	EBT	EBR	WBL	WBT	WBR	TOTAL
Existing 2023:	0	0	21	0	0	0	0	0	0	45	0	0	66
2-Axle:	0	0	0	0	0	0	0	0	0	1	0	0	1
3-Axle:	0	0	0	0	0	0	0	0	0	1	0	0	1
4+-Axle:	0	0	0	0	0	0	0	0	0	3	0	0	3
2023 Trucks:	0	0	0	0	0	0	0	0	0	5	0	0	5
2023 PCE:	**0**	**0**	**21**	**0**	**0**	**0**	**0**	**0**	**0**	**53**	**0**	**0**	**74**
2023 ADT:		1,365			0			0			1,365		
2023 Pk-Daily:		5%			0%			0%			5%		
Project:	5	7	0	0	0	0	0	1	3	0	3	2	21
Project PCE:	6	7	0	0	0	0	0	2	7	0	4	2	28
Project ADT:		286			158			250			122		
Cumulative:	0	4	15	0	0	0	0	0	0	3	0	3	25
Cumulative PCE	0	4	17	0	0	0	0	0	0	7	0	3	31
Cumulative ADT:		90			124			182			248		
E+P:	5	7	21	0	0	0	0	1	3	45	3	2	87
E+P PCE:	6	7	21	0	0	0	0	2	7	53	4	2	102
E+P ADT:		1,651			158			250			1,487		
2025 NP:	0	4	37	0	0	0	0	0	0	50	0	3	94
2025 NP PCE:	0	4	39	0	0	0	0	0	0	62	0	3	107
2025 NP ADT:		1,510			124			182			1,668		
2025 WP:	5	11	37	0	0	0	0	1	3	50	3	5	115
2025 WP PCE:	6	11	39	0	0	0	0	2	7	62	4	5	135
2025 WP ADT:		1,796			282			432			1,790		

Volume Development
AM Peak Hour

3. McDonnell Dr./Cara Wy. & Plaza Dr.

PHF: 0.852 **7:45** Count Date: 8/30/2022

	NBL	NBT	NBR	SBL	SBT	SBR	EBL	EBT	EBR	WBL	WBT	WBR	TOTAL
Existing 2023:	19	2	72	0	0	0	0	21	0	6	102	3	225
2-Axle:	0	0	0	0	0	0	0	3	0	0	1	1	5
3-Axle:	0	0	3	0	0	0	0	0	0	0	1	0	4
4+-Axle:	0	0	1	0	0	0	0	0	0	1	0	0	2
2023 Trucks:	0	0	4	0	0	0	0	3	0	1	2	1	11
2023 PCE:	**19**	**2**	**77**	**0**	**0**	**0**	**0**	**23**	**0**	**8**	**104**	**4**	**236**
2023 ADT:		338			34			1,917			802		
2023 Pk-Daily:		31%			16%			8%			27%		
Project:	1	0	0	0	0	0	0	1	0	0	5	0	7
Project PCE:	1	0	0	0	0	0	0	2	0	0	5	0	8
Project ADT:		14			0			122			108		
Cumulative:	0	1	35	1	0	0	0	15	0	6	9	6	73
Cumulative PCE	0	1	35	1	0	0	0	23	0	6	14	6	86
Cumulative ADT:		0			150			326			450		
E+P:	20	2	72	0	0	0	0	22	0	6	107	3	232
E+P PCE:	20	2	77	0	0	0	0	25	0	8	109	4	244
E+P ADT:		352			34			2,039			910		
2025 NP:	20	3	110	1	0	0	0	37	0	12	115	9	307
2025 NP PCE:	20	3	115	1	0	0	0	46	0	14	122	10	331
2025 NP ADT:		352			185			2,321			1,284		
2025 WP:	21	3	110	1	0	0	0	38	0	12	120	6	311
2025 WP PCE:	21	3	115	1	0	0	0	48	0	14	127	6	335
2025 WP ADT:		366			150			2,443			1,392		

4. Valley View St. & Plaza Dr.

PHF: 0.988 **7:45** Count Date: 8/30/2022

	NBL	NBT	NBR	SBL	SBT	SBR	EBL	EBT	EBR	WBL	WBT	WBR	TOTAL
Existing 2023:	21	1,473	181	254	1,487	150	9	3	14	12	0	37	3,641
2-Axle:	1	52	0	0	63	1	0	2	1	0	0	3	123
3-Axle:	0	1	0	0	14	1	0	3	0	0	0	0	19
4+-Axle:	0	8	0	0	9	1	0	1	0	0	0	0	19
2023 Trucks:	1	61	0	0	86	3	0	6	1	0	0	3	161
2023 PCE:	**22**	**1,516**	**181**	**254**	**1,551**	**154**	**9**	**9**	**15**	**12**	**0**	**39**	**3,760**
2023 ADT:		41,145			42,071			3,192			6,767		
2023 Pk-Daily:		8%			8%			7%			7%		
Project:	0	0	0	0	0	5	1	0	0	0	0	0	6
Project PCE:	0	0	0	0	0	5	2	0	0	0	0	0	7
Project ADT:		0			108			108			0		
Cumulative:	37	10	0	0	7	52	10	0	7	0	0	0	123
Cumulative PCE	40	10	0	0	7	54	12	0	12	0	0	0	135
Cumulative ADT:		336			1,054			846			544		
E+P:	21	1,473	181	254	1,487	155	10	3	14	12	0	37	3,647
E+P PCE:	22	1,516	181	254	1,551	159	11	9	15	12	0	39	3,767
E+P ADT:		41,145			42,179			3,300			6,767		
2025 NP:	59	1,543	188	264	1,554	208	19	3	22	12	0	38	3,911
2025 NP PCE:	62	1,587	188	264	1,620	214	21	9	27	12	0	40	4,046
2025 NP ADT:		43,143			44,825			4,167			7,585		
2025 WP:	59	1,543	188	264	1,554	213	20	3	22	12	0	38	3,917
2025 WP PCE:	62	1,587	188	264	1,620	219	23	9	27	12	0	40	4,053
2025 WP ADT:		43,143			44,933			4,275			7,585		

Volume Development
PM Peak Hour

1. Douglas Dr. & Katella Av.

		PHF:	0.894		4:30					Count Date:	8/30/2022		
	NBL	NBT	NBR	SBL	SBT	SBR	EBL	EBT	EBR	WBL	WBT	WBR	TOTAL
Existing 2023:	81	1	7	24	2	46	11	1,926	28	8	1,572	6	3,712
2-Axle:	0	0	0	0	0	1	0	50	0	1	35	0	87
3-Axle:	0	0	0	0	0	0	0	6	0	0	4	0	10
4+-Axle:	1	0	0	1	0	0	0	3	2	0	7	0	14
2023 Trucks:	1	0	0	1	0	1	0	59	2	1	46	0	111
2023 PCE:	**83**	**1**	**7**	**26**	**2**	**47**	**11**	**1,963**	**32**	**9**	**1,608**	**6**	**3,794**
2023 ADT:		1,432			1,015			**42,972**			39,960		
2023 Pk-Daily:		9%			9%			9%			9%		
Project:	0	0	0	3	0	9	4	0	0	0	0	2	18
Project PCE:	0	0	0	4	0	11	6	0	0	0	0	3	24
Project ADT:		0			286			204			82		
Cumulative:	0	0	0	0	0	19	5	62	0	0	83	0	169
Cumulative PCE	0	0	0	0	0	21	7	62	0	0	83	0	173
Cumulative ADT:		0			272			2,440			2,168		
E+P:	81	1	7	27	2	55	15	1,926	28	8	1,572	8	3,730
E+P PCE:	83	1	7	30	2	58	17	1,963	32	9	1,608	9	3,818
E+P ADT:		1,432			1,301			43,176			40,042		
2025 NP:	84	1	7	25	2	67	16	2,066	29	8	1,719	6	4,031
2025 NP PCE:	86	1	7	27	2	69	18	2,104	33	9	1,755	6	4,120
2025 NP ADT:		1,490			1,328			47,148			43,743		
2025 WP:	84	1	7	28	2	76	20	2,066	29	8	1,719	8	4,049
2025 WP PCE:	86	1	7	31	2	80	24	2,104	33	9	1,755	9	4,144
2025 WP ADT:		1,490			1,614			47,352			43,825		

2. Driveway 2/Douglas Dr. & Driveway 1/Plaza Dr.

		PHF:	0.750		5:00					Count Date:	8/30/2022		
	NBL	NBT	NBR	SBL	SBT	SBR	EBL	EBT	EBR	WBL	WBT	WBR	TOTAL
Existing 2023:	0	0	23	0	0	0	0	0	0	98	0	0	121
2-Axle:	0	0	1	0	0	0	0	0	0	3	0	0	4
3-Axle:	0	0	0	0	0	0	0	0	0	0	0	0	0
4+-Axle:	0	0	0	0	0	0	0	0	0	0	0	0	0
2023 Trucks:	0	0	1	0	0	0	0	0	0	3	0	0	4
2023 PCE:	**0**	**0**	**24**	**0**	**0**	**0**	**0**	**0**	**0**	**100**	**0**	**0**	**123**
2023 ADT:		1,365			0			0			1,365		
2023 Pk-Daily:		9%			0%			0%			9%		
Project:	3	2	0	2	6	0	0	3	5	0	1	1	23
Project PCE:	6	2	0	2	6	0	0	4	8	0	2	1	31
Project ADT:		286			158			250			122		
Cumulative:	0	1	4	3	4	0	0	0	0	15	0	1	28
Cumulative PCE	0	1	5	3	4	0	0	0	0	17	0	1	31
Cumulative ADT:		90			124			182			248		
E+P:	3	2	23	2	6	0	0	3	5	98	1	1	144
E+P PCE:	6	2	24	2	6	0	0	4	8	100	2	1	154
E+P ADT:		1,651			158			250			1,487		
2025 NP:	0	1	28	3	4	0	0	0	0	117	0	1	154
2025 NP PCE:	0	1	29	3	4	0	0	0	0	121	0	1	159
2025 NP ADT:		1,510			124			182			1,668		
2025 WP:	3	3	28	5	10	0	0	3	5	117	1	2	177
2025 WP PCE:	6	3	29	5	10	0	0	4	8	121	2	2	190
2025 WP ADT:		1,796			282			432			1,790		

Volume Development
PM Peak Hour

3. McDonnell Dr./Cara Wy. & Plaza Dr.

PHF: 0.625 4:45 Count Date: 8/30/2022

	NBL	NBT	NBR	SBL	SBT	SBR	EBL	EBT	EBR	WBL	WBT	WBR	TOTAL
Existing 2023:	5	0	9	0	3	0	0	85	2	11	78	0	193
2-Axle:	0	0	0	0	0	0	0	1	0	0	3	0	4
3-Axle:	0	0	0	0	0	0	0	0	0	0	0	0	0
4+-Axle:	0	0	0	0	0	0	0	0	0	0	0	0	0
2023 Trucks:	0	0	0	0	0	0	0	1	0	0	3	0	4
2023 PCE:	**5**	**0**	**9**	**0**	**3**	**0**	**0**	**86**	**2**	**11**	**80**	**0**	**195**
2023 ADT:		338			34			1,917			802		
2023 Pk-Daily:		9%			9%			9%			23%		
Project:	0	0	0	0	0	0	0	5	1	0	2	0	8
Project PCE:	0	0	0	0	0	0	0	6	1	0	3	0	10
Project ADT:		14			0			122			108		
Cumulative:	0	0	7	7	1	0	0	10	0	32	15	2	74
Cumulative PCE	0	0	7	7	1	0	0	14	0	32	19	2	82
Cumulative ADT:		0			150			326			450		
E+P:	5	0	9	0	3	0	0	90	3	11	80	0	201
E+P PCE:	5	0	9	0	3	0	0	92	3	11	83	0	205
E+P ADT:		352			34			2,039			910		
2025 NP:	5	0	16	7	4	0	0	98	2	43	96	2	275
2025 NP PCE:	5	0	16	7	4	0	0	103	2	43	102	2	285
2025 NP ADT:		352			185			2,321			1,284		
2025 WP:	5	0	16	7	1	0	0	103	3	43	98	2	280
2025 WP PCE:	5	0	16	7	1	0	0	109	3	43	105	2	292
2025 WP ADT:		366			150			2,443			1,392		

4. Valley View St. & Plaza Dr.

PHF: 0.957 4:30 Count Date: 8/30/2022

	NBL	NBT	NBR	SBL	SBT	SBR	EBL	EBT	EBR	WBL	WBT	WBR	TOTAL
Existing 2023:	4	1,932	12	49	1,484	23	168	0	60	156	28	355	4,271
2-Axle:	0	34	0	6	18	0	0	0	1	0	3	0	62
3-Axle:	0	6	0	0	4	0	0	0	0	0	0	0	10
4+-Axle:	0	6	0	0	3	0	0	0	0	3	0	0	12
2023 Trucks:	0	46	0	6	25	0	0	0	1	3	3	0	84
2023 PCE:	**4**	**1,967**	**12**	**52**	**1,503**	**23**	**168**	**0**	**61**	**162**	**30**	**355**	**4,336**
2023 ADT:		41,145			42,071			3,192			6,767		
2023 Pk-Daily:		9%			10%			9%			9%		
Project:	0	0	0	0	0	2	5	0	0	0	0	0	7
Project PCE:	0	0	0	0	0	3	6	0	0	0	0	0	9
Project ADT:		0			108			108			0		
Cumulative:	10	15	0	0	18	12	49	0	36	0	0	0	140
Cumulative PCE	12	15	0	0	18	13	51	0	39	0	0	0	148
Cumulative ADT:		336			1,054			846			544		
E+P:	4	1,932	12	49	1,484	25	173	0	60	156	28	355	4,278
E+P PCE:	4	1,967	12	52	1,503	26	174	0	61	162	30	355	4,345
E+P ADT:		41,145			42,179			3,300			6,767		
2025 NP:	14	2,025	12	51	1,562	36	224	0	98	162	29	369	4,584
2025 NP PCE:	16	2,061	12	54	1,582	37	226	0	102	169	31	369	4,659
2025 NP ADT:		43,143			44,825			4,167			7,585		
2025 WP:	14	2,025	12	51	1,562	38	229	0	98	162	29	369	4,591
2025 WP PCE:	16	2,061	12	54	1,582	40	232	0	102	169	31	369	4,668
2025 WP ADT:		43,143			44,933			4,275			7,585		

T42321

INTERSECTION TURNING MOVEMENT COUNTS

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE: Tue, Aug 30, 22

LOCATION: Cypress
NORTH & SOUTH: Douglas
EAST & WEST: Katella

PROJECT #: SC3604
LOCATION #: 1
CONTROL: SIGNAL

NOTES:

AM / PM / MD / OTHER / OTHER — ▲ N ◄ W E ► S ▼

Add U-Turns to Left Turns

		NORTHBOUND (Douglas)			SOUTHBOUND (Douglas)			EASTBOUND (Katella)			WESTBOUND (Katella)			
	LANES:	NL 1	NT 1	NR 0	SL 1	ST 1	SR 1	EL 1	ET 3	ER 1	WL 1	WT 3	WR 1	TOTAL
AM	7:00 AM	5	0	1	0	0	3	8	293	15	1	275	1	602
AM	7:15 AM	4	1	0	2	1	3	2	318	20	2	402	3	758
AM	7:30 AM	3	0	0	0	0	1	2	385	8	3	415	5	822
AM	7:45 AM	6	0	2	0	0	2	5	419	15	2	429	5	885
AM	8:00 AM	6	2	2	1	1	2	6	427	27	4	404	12	894
AM	8:15 AM	2	0	1	1	0	7	13	390	10	0	403	11	838
AM	8:30 AM	7	0	0	1	0	2	10	339	10	6	374	9	758
AM	8:45 AM	5	1	0	0	0	2	4	324	16	4	332	5	693
AM	VOLUMES	38	4	6	5	2	22	50	2,895	121	22	3,034	51	6,250
AM	APPROACH %	79%	8%	13%	17%	7%	76%	2%	94%	4%	1%	98%	2%	
AM	APP/DEPART	48	/	101	29	/	142	3,066	/	2,909	3,107	/	3,098	0
AM	BEGIN PEAK HR		7:30 AM											
AM	VOLUMES	17	2	5	2	1	12	26	1,621	60	9	1,651	33	3,439
AM	APPROACH %	71%	8%	21%	13%	7%	80%	2%	95%	4%	1%	98%	2%	
AM	PEAK HR FACTOR		0.600			0.469			0.928			0.971		0.962
AM	APP/DEPART	24	/	59	15	/	69	1,707	/	1,629	1,693	/	1,682	0
PM	4:00 PM	24	0	4	9	0	10	3	451	5	1	333	0	838
PM	4:15 PM	14	1	3	4	0	8	4	476	6	3	305	1	825
PM	4:30 PM	23	1	2	6	0	9	2	449	7	0	375	2	876
PM	4:45 PM	20	0	2	6	0	5	3	432	9	2	378	0	857
PM	5:00 PM	16	0	3	5	1	22	5	522	4	5	433	2	1,018
PM	5:15 PM	20	0	0	7	1	9	1	485	7	1	355	2	888
PM	5:30 PM	8	1	2	4	0	14	3	452	4	3	378	1	870
PM	5:45 PM	9	0	0	5	0	6	3	426	7	0	334	1	791
PM	VOLUMES	134	3	16	46	2	83	24	3,693	47	15	2,891	9	6,963
PM	APPROACH %	88%	2%	10%	35%	2%	63%	1%	98%	1%	1%	99%	0%	
PM	APP/DEPART	153	/	19	131	/	57	3,764	/	3,762	2,915	/	3,125	0
PM	BEGIN PEAK HR		4:30 PM											
PM	VOLUMES	79	1	7	24	2	45	11	1,888	27	8	1,541	6	3,639
PM	APPROACH %	91%	1%	8%	34%	3%	63%	1%	98%	1%	1%	99%	0%	
PM	PEAK HR FACTOR		0.837			0.634			0.907			0.884		0.894
PM	APP/DEPART	87	/	8	71	/	32	1,926	/	1,924	1,555	/	1,675	0

U-TURNS

NB 0	SB 0	EB 0	WB 0	TTL
0	0	2	0	2
0	0	0	0	0
0	0	0	0	0
0	0	0	1	1
0	0	0	0	0
0	0	2	0	2
0	0	0	2	2
0	0	0	0	0
0	0	4	3	7
0	0	2	0	2
0	0	1	0	1
0	0	2	0	2
0	0	3	1	4
0	0	4	4	8
0	0	1	0	1
0	0	2	2	4
0	0	2	0	2
0	0	17	7	24

RTOR

NRR 0	SRR 0	ERR 0	WRR 0
1	3	0	1
0	3	3	0
0	1	1	1
1	2	3	0
2	1	3	4
0	6	1	0
0	1	0	0
0	2	0	0
4	19	11	6
3	10	8	5
2	4	0	0
3	8	0	0
1	6	1	0
2	5	3	0
1	13	1	0
0	6	0	0
1	12	0	0
0	4	0	1
10	58	5	1
4	30	5	0

Douglas

NORTH SIDE

Katella WEST SIDE EAST SIDE **Katella**

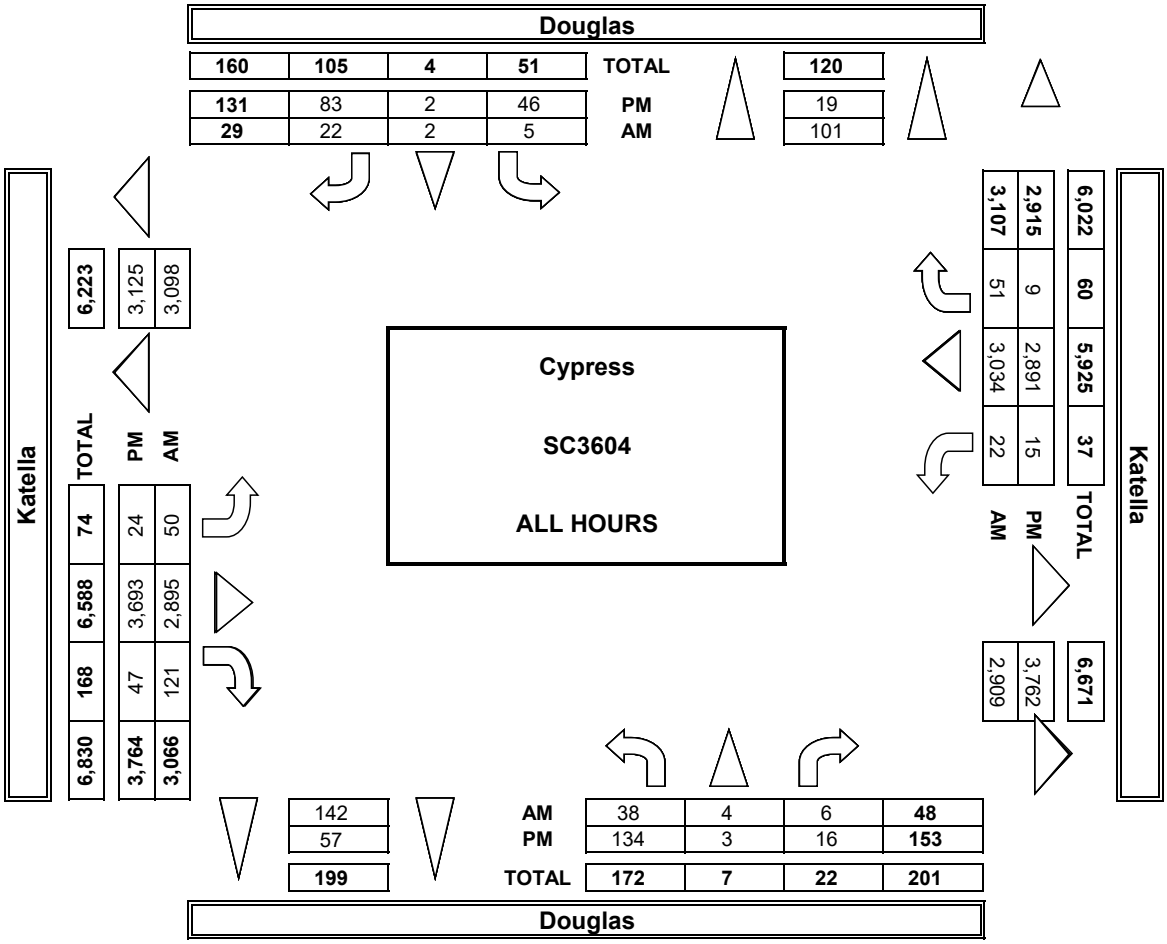
SOUTH SIDE

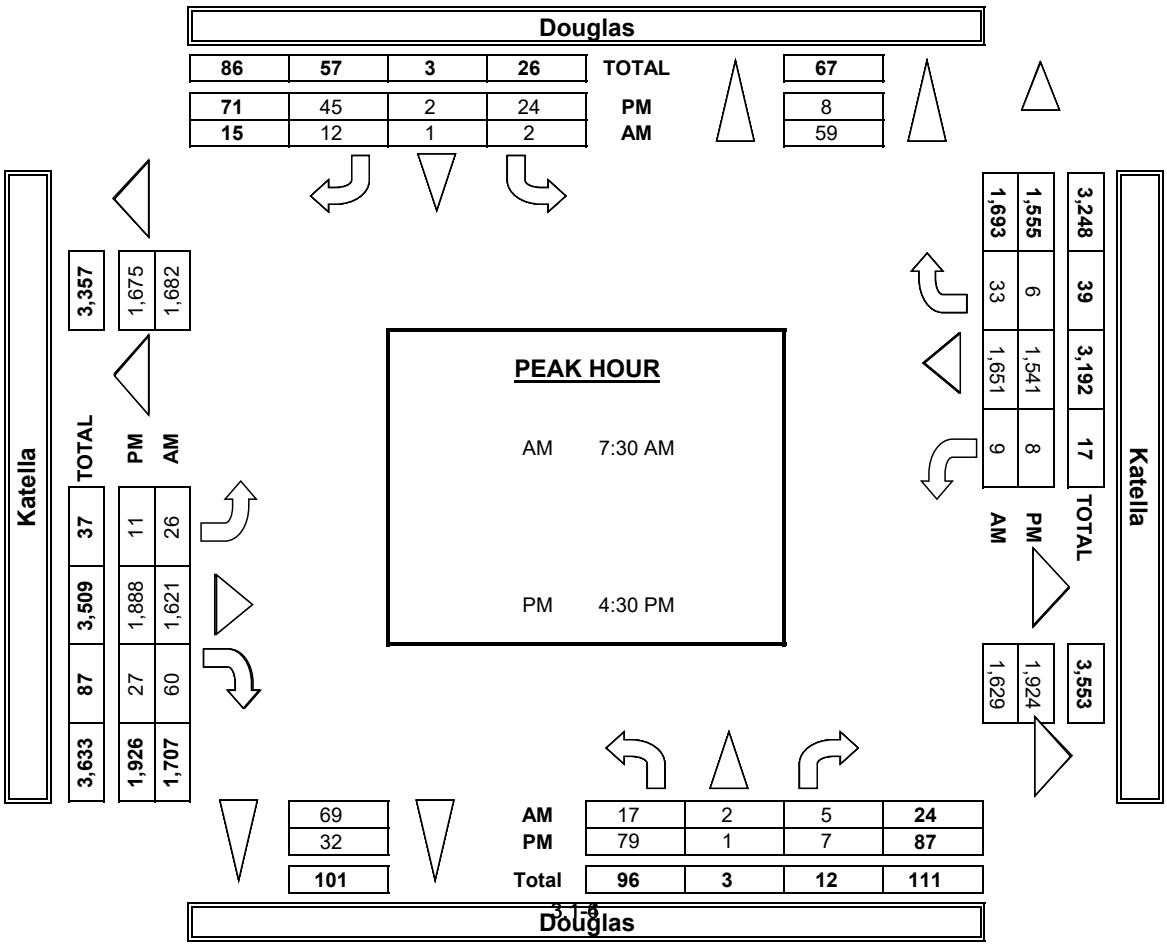
Douglas

		ALL PED AND BIKE					PEDESTRIAN CROSSINGS					BICYCLE CROSSINGS				
		E SIDE	W SIDE	S SIDE	N SIDE	TOTAL	E SIDE	W SIDE	S SIDE	N SIDE	TOTAL	ES	WS	SS	NS	TOTAL
AM	7:00 AM	0	0	1	0	1	0	0	1	0	1	0	0	0	0	0
AM	7:15 AM	1	0	0	1	2	1	0	0	1	2	0	0	0	0	0
AM	7:30 AM	3	1	2	3	9	0	0	0	0	0	3	1	2	3	9
AM	7:45 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AM	8:00 AM	0	1	0	0	1	0	1	0	0	1	0	0	0	0	0
AM	8:15 AM	0	0	1	1	2	0	0	0	0	0	0	0	1	1	2
AM	8:30 AM	0	0	3	0	3	0	0	2	0	2	0	0	1	0	1
AM	8:45 AM	0	0	1	1	2	0	0	0	0	0	0	0	1	1	2
AM	TOTAL	4	2	8	6	20	1	1	3	1	6	3	1	5	5	14
PM	4:00 PM	1	0	0	1	2	1	0	0	0	1	0	0	0	1	1
PM	4:15 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
PM	4:30 PM	0	0	2	0	2	0	0	1	0	1	0	0	1	0	1
PM	4:45 PM	0	0	2	0	2	0	0	0	0	0	0	0	2	0	2
PM	5:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
PM	5:15 PM	0	1	0	2	3	0	0	0	1	1	0	1	0	1	2
PM	5:30 PM	1	0	0	0	1	0	0	0	0	0	1	0	0	0	1
PM	5:45 PM	0	0	2	0	2	0	0	1	0	1	0	0	1	0	1
	TOTAL	2	1	6	3	12	1	0	2	1	4	1	1	4	2	8

AimTD LLC

TURNING MOVEMENT COUNTS





INTERSECTION TURNING MOVEMENT COUNTS

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE:	LOCATION:	Cypress	PROJECT #:	SC3604
8/30/22	NORTH & SOUTH:	Douglas	LOCATION #:	1
TUESDAY	EAST & WEST:	Katella	CONTROL:	SIGNAL

CLASS 2: 2-AXLE WORK VEHICLES/ TRUCKS	NOTES:	AM PM MD OTHER OTHER	▲ N ◄ W E ► S ▼

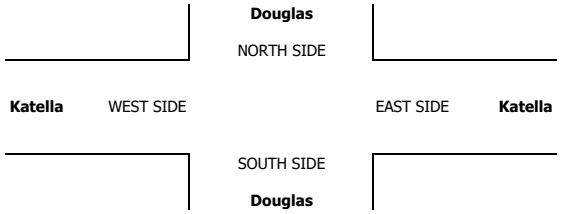
		NORTHBOUND Douglas			SOUTHBOUND Douglas			EASTBOUND Katella			WESTBOUND Katella			
	LANES:	NL 1	NT 1	NR 0	SL 1	ST 1	SR 1	EL 1	ET 3	ER 1	WL 1	WT 3	WR 1	TOTAL
AM	7:00 AM	1	0	0	0	0	0	2	17	0	0	12	0	32
	7:15 AM	0	0	0	1	0	0	0	11	2	0	20	0	34
	7:30 AM	0	0	0	0	0	1	0	14	0	1	31	0	47
	7:45 AM	2	0	0	0	0	0	0	14	0	0	13	0	29
	8:00 AM	0	0	0	0	0	0	0	19	1	0	18	0	38
	8:15 AM	0	0	0	0	0	0	1	15	0	0	14	0	30
	8:30 AM	0	0	0	0	0	0	0	16	1	0	21	0	38
	8:45 AM	1	0	0	0	0	0	0	16	2	0	19	0	38
	VOLUMES	4	0	0	1	0	1	3	122	6	1	148	0	286
	APPROACH %	100%	0%	0%	50%	0%	50%	2%	93%	5%	1%	99%	0%	
	APP/DEPART	4	/	2	2	/	7	131	/	123	149	/	154	0
	BEGIN PEAK HR		7:30 AM											
	VOLUMES	2	0	0	0	0	1	0	62	1	1	76	0	144
	APPROACH %	100%	0%	0%	0%	0%	100%	0%	97%	2%	1%	99%	0%	
	PEAK HR FACTOR		0.250			0.250			0.800			0.602		0.766
	APP/DEPART	2	/	0	1	/	2	64	/	62	77	/	80	0
PM	4:00 PM	0	0	0	0	0	0	1	17	0	0	9	0	27
	4:15 PM	0	0	0	0	0	0	0	13	0	0	9	1	23
	4:30 PM	0	0	0	0	0	0	0	9	0	0	12	0	21
	4:45 PM	0	0	0	0	0	0	0	7	0	0	4	0	11
	5:00 PM	0	0	0	0	0	1	0	16	0	1	10	0	28
	5:15 PM	0	0	0	0	0	0	0	17	0	0	8	0	25
	5:30 PM	0	0	0	0	0	0	0	9	0	0	2	0	11
	5:45 PM	0	0	0	0	0	0	0	6	0	0	5	0	11
	VOLUMES	0	0	0	0	0	1	1	94	0	1	59	1	157
	APPROACH %	0%	0%	0%	0%	0%	100%	1%	99%	0%	2%	97%	2%	
	APP/DEPART	0	/	1	1	/	1	95	/	94	61	/	61	0
	BEGIN PEAK HR		4:30 PM											
	VOLUMES	0	0	0	0	0	1	0	49	0	1	34	0	85
	APPROACH %	0%	0%	0%	0%	0%	100%	0%	100%	0%	3%	97%	0%	
	PEAK HR FACTOR		0.000			0.250			0.721			0.729		0.759
	APP/DEPART	0	/	0	1	/	1	49	/	49	35	/	35	0

U-TURNS

NB	SB	EB	WB	TTL
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	1	0	1
0	0	0	0	0
0	0	0	0	0
0	0	1	0	1
0	0	1	0	1
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	1	0	1

RTOR

NRR	SRR	ERR	WRR
0	0	0	0
0	0	0	0
0	0	1	0
0	1	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	1	1	0
0	1	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0



INTERSECTION TURNING MOVEMENT COUNTS

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE:	LOCATION:	Cypress	PROJECT #:	SC3604
8/30/22	NORTH & SOUTH:	Douglas	LOCATION #:	1
TUESDAY	EAST & WEST:	Katella	CONTROL:	SIGNAL

CLASS 3: 3-AXLE TRUCKS

NOTES:

AM / PM / MD / OTHER / OTHER — ▲ N, ◄ W, E ►, S ▼

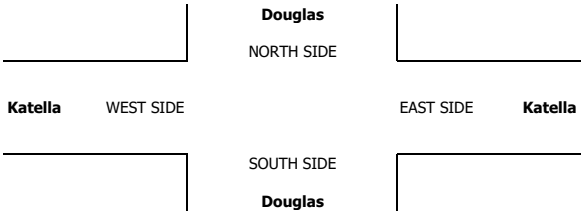
		NORTHBOUND (Douglas)			SOUTHBOUND (Douglas)			EASTBOUND (Katella)			WESTBOUND (Katella)			
	LANES:	NL 1	NT 1	NR 0	SL 1	ST 1	SR 1	EL 1	ET 3	ER 1	WL 1	WT 3	WR 1	TOTAL
AM	7:00 AM	0	0	0	0	0	0	0	0	0	0	1	0	1
	7:15 AM	0	0	0	0	0	0	0	0	0	0	2	0	2
	7:30 AM	0	0	0	0	0	0	0	1	0	0	1	0	2
	7:45 AM	0	0	0	0	0	0	0	1	0	0	4	0	5
	8:00 AM	0	0	0	0	0	0	0	1	2	0	6	0	9
	8:15 AM	0	0	0	0	0	0	0	0	0	0	2	0	2
	8:30 AM	0	0	0	0	0	0	0	1	0	0	3	0	4
	8:45 AM	1	0	0	0	0	0	0	11	0	0	2	0	14
	VOLUMES	1	0	0	0	0	0	0	15	2	0	21	0	39
	APPROACH %	100%	0%	0%	0%	0%	0%	0%	88%	12%	0%	100%	0%	
	APP/DEPART	1	/	0	0	/	2	17	/	15	21	/	22	0
	BEGIN PEAK HR		7:30 AM											
	VOLUMES	0	0	0	0	0	0	0	3	2	0	13	0	18
	APPROACH %	0%	0%	0%	0%	0%	0%	0%	60%	40%	0%	100%	0%	
	PEAK HR FACTOR		0.000			0.000			0.417			0.542		0.500
	APP/DEPART	0	/	0	0	/	2	5	/	3	13	/	13	0
PM	4:00 PM	0	0	0	0	0	0	0	5	0	0	1	0	6
	4:15 PM	0	0	0	0	0	0	0	3	0	0	1	0	4
	4:30 PM	0	0	0	0	0	0	0	1	0	0	2	0	3
	4:45 PM	0	0	0	0	0	0	0	3	0	0	2	0	5
	5:00 PM	0	0	0	0	0	0	0	1	0	0	0	0	1
	5:15 PM	0	0	0	0	0	0	0	1	0	0	0	0	1
	5:30 PM	0	0	0	0	0	0	0	3	0	0	0	0	3
	5:45 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	VOLUMES	0	0	0	0	0	0	0	17	0	0	6	0	23
	APPROACH %	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	100%	0%	
	APP/DEPART	0	/	0	0	/	0	17	/	17	6	/	6	0
	BEGIN PEAK HR		4:30 PM											
	VOLUMES	0	0	0	0	0	0	0	6	0	0	4	0	10
	APPROACH %	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	100%	0%	
	PEAK HR FACTOR		0.000			0.000			0.500			0.500		0.500
	APP/DEPART	0	/	0	0	/	0	6	/	6	4	/	4	0

U-TURNS

NB	SB	EB	WB	TTL
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0

RTOR

NRR	SRR	ERR	WRR
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0



INTERSECTION TURNING MOVEMENT COUNTS

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE:	LOCATION:	Cypress	PROJECT #:	SC3604
8/30/22	NORTH & SOUTH:	Douglas	LOCATION #:	1
TUESDAY	EAST & WEST:	Katella	CONTROL:	SIGNAL

CLASS 4: 4 OR MORE AXLE TRUCKS

NOTES:

AM / PM / MD / OTHER / OTHER — ▲ N, ◄ W, E ►, S ▼

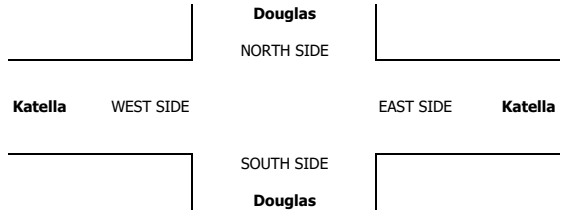
	NORTHBOUND (Douglas)			SOUTHBOUND (Douglas)			EASTBOUND (Katella)			WESTBOUND (Katella)			
LANES:	NL 1	NT 1	NR 0	SL 1	ST 1	SR 1	EL 1	ET 3	ER 1	WL 1	WT 3	WR 1	TOTAL
7:00 AM	3	0	0	0	0	0	0	2	2	0	5	0	12
7:15 AM	0	0	0	0	0	0	0	2	2	0	2	0	6
7:30 AM	1	0	0	0	0	0	0	2	1	1	5	0	10
7:45 AM	1	0	0	0	0	0	0	2	1	0	5	0	9
8:00 AM	2	0	0	0	0	0	0	1	1	0	9	0	13
8:15 AM	0	0	0	0	0	1	0	2	1	0	4	0	8
8:30 AM	2	0	0	0	0	0	0	6	1	0	7	0	16
8:45 AM	1	0	0	0	0	0	0	6	0	0	5	0	12
VOLUMES	10	0	0	0	0	1	0	23	9	1	42	0	86
APPROACH %	100%	0%	0%	0%	0%	100%	0%	72%	28%	2%	98%	0%	
APP/DEPART	10	/	0	1	/	10	32	/	23	43	/	53	0
BEGIN PEAK HR	7:30 AM												
VOLUMES	4	0	0	0	0	1	0	7	4	1	23	0	40
APPROACH %	100%	0%	0%	0%	0%	100%	0%	64%	36%	4%	96%	0%	
PEAK HR FACTOR	0.500			0.250			0.917			0.667			0.769
APP/DEPART	4	/	0	1	/	5	11	/	7	24	/	28	0
4:00 PM	0	0	0	0	0	0	0	2	0	1	5	0	8
4:15 PM	0	0	0	0	0	0	0	1	0	1	2	0	4
4:30 PM	1	0	0	0	0	0	0	0	0	0	3	0	4
4:45 PM	0	0	0	1	0	0	0	1	2	0	4	0	8
5:00 PM	0	0	0	0	0	0	0	1	0	0	0	0	1
5:15 PM	0	0	0	0	0	0	0	1	0	0	0	0	1
5:30 PM	0	0	0	0	0	0	0	0	0	0	1	0	1
5:45 PM	0	0	0	0	0	0	0	2	0	0	1	0	3
VOLUMES	1	0	0	1	0	0	0	8	2	2	16	0	30
APPROACH %	100%	0%	0%	100%	0%	0%	0%	80%	20%	11%	89%	0%	
APP/DEPART	1	/	0	1	/	4	10	/	9	18	/	17	0
BEGIN PEAK HR	4:30 PM												
VOLUMES	1	0	0	1	0	0	0	3	2	0	7	0	14
APPROACH %	100%	0%	0%	100%	0%	0%	0%	60%	40%	0%	100%	0%	
PEAK HR FACTOR	0.250			0.250			0.417			0.438			0.438
APP/DEPART	1	/	0	1	/	2	5	/	4	7	/	8	0

U-TURNS

	NB	SB	EB	WB	TTL
AM	0	0	0	0	0
	0	0	0	0	0
	0	0	0	0	0
	0	0	0	0	0
	0	0	0	0	0
	0	0	0	0	0
	0	0	0	0	0
	0	0	0	0	0
	0	0	0	0	0
PM	0	0	0	0	0
	0	0	0	0	0
	0	0	0	0	0
	0	0	0	0	0
	0	0	0	0	0
	0	0	0	0	0
	0	0	0	0	0
	0	0	0	0	0
	0	0	0	0	0
	0	0	0	0	0

RTOR

	NRR 0	SRR 0	ERR 0	WRR 0
AM	0	0	0	0
	0	0	0	0
	0	0	0	0
	0	0	0	0
	0	0	0	0
	0	0	0	0
	0	0	0	0
	0	0	0	0
	0	0	0	0
	0	0	0	0
PM	0	0	0	0
	0	0	0	0
	0	0	0	0
	0	0	0	0
	0	0	0	0
	0	0	0	0
	0	0	0	0
	0	0	0	0
	0	0	0	0
	0	0	0	0



T42321

INTERSECTION TURNING MOVEMENT COUNTS

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE: Tue, Aug 30, 22

LOCATION: Cypress
NORTH & SOUTH: Driveway 1
EAST & WEST: Plaza

PROJECT #: SC3604
LOCATION #: 2
CONTROL: NO CONTROL

NOTES:

AM
PM
MD
OTHER
OTHER

N ▲ | ◄ W | E ► | S ▼

Add U-Turns to Left Turns

		NORTHBOUND Driveway 1			SOUTHBOUND Driveway 1			EASTBOUND Plaza			WESTBOUND Plaza			
	LANES:	NL X	NT X	NR X	SL 0	ST X	SR 0	EL 0	ET 1	ER X	WL X	WT 1	WR 0	TOTAL
AM	7:00 AM	0	0	0	1	0	0	0	0	0	0	4	1	6
	7:15 AM	0	0	0	1	0	0	1	0	0	0	5	0	7
	7:30 AM	0	0	0	0	0	1	0	0	0	0	3	0	4
	7:45 AM	0	0	0	0	0	0	0	0	0	0	5	0	5
	8:00 AM	0	0	0	0	0	0	0	1	0	0	10	0	11
	8:15 AM	0	0	0	0	0	2	1	0	0	0	6	0	9
	8:30 AM	0	0	0	0	0	0	1	1	0	0	6	0	8
	8:45 AM	0	0	0	0	0	0	0	1	0	0	9	0	10
	VOLUMES	0	0	0	2	0	3	3	3	0	0	48	1	60
	APPROACH %	0%	0%	0%	40%	0%	60%	50%	50%	0%	0%	98%	2%	
	APP/DEPART	0	/	4	5	/	0	6	/	5	49	/	51	0
	BEGIN PEAK HR		8:00 AM											
	VOLUMES	0	0	0	0	0	2	2	3	0	0	31	0	38
	APPROACH %	0%	0%	0%	0%	0%	100%	40%	60%	0%	0%	100%	0%	
	PEAK HR FACTOR		0.000			0.250			0.625			0.775		0.864
	APP/DEPART	0	/	2	2	/	0	5	/	3	31	/	33	0
PM	4:00 PM	0	0	0	0	0	0	0	1	0	0	9	0	10
	4:15 PM	0	0	0	0	0	2	0	6	0	0	2	0	10
	4:30 PM	0	0	0	0	0	0	0	2	0	0	5	0	7
	4:45 PM	0	0	0	0	0	1	0	0	0	0	5	0	6
	5:00 PM	0	0	0	0	0	2	0	6	0	0	7	1	16
	5:15 PM	0	0	0	0	0	1	0	8	0	0	3	0	12
	5:30 PM	0	0	0	0	0	1	0	4	0	0	5	1	11
	5:45 PM	0	0	0	1	0	1	0	5	0	0	2	0	9
	VOLUMES	0	0	0	1	0	8	0	32	0	0	38	2	81
	APPROACH %	0%	0%	0%	11%	0%	89%	0%	100%	0%	0%	95%	5%	
	APP/DEPART	0	/	2	9	/	0	32	/	33	40	/	46	0
	BEGIN PEAK HR		5:00 PM											
	VOLUMES	0	0	0	1	0	5	0	23	0	0	17	2	48
	APPROACH %	0%	0%	0%	17%	0%	83%	0%	100%	0%	0%	89%	11%	
	PEAK HR FACTOR		0.000			0.750			0.719			0.594		0.750
	APP/DEPART	0	/	2	6	/	0	23	/	24	19	/	22	0

U-TURNS

NB	SB	EB	WB	TTL
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0

RTOR

NRR X	SRR X	ERR X	WRR X
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0

Driveway 1
NORTH SIDE

Plaza WEST SIDE EAST SIDE **Plaza**

SOUTH SIDE
Driveway 1

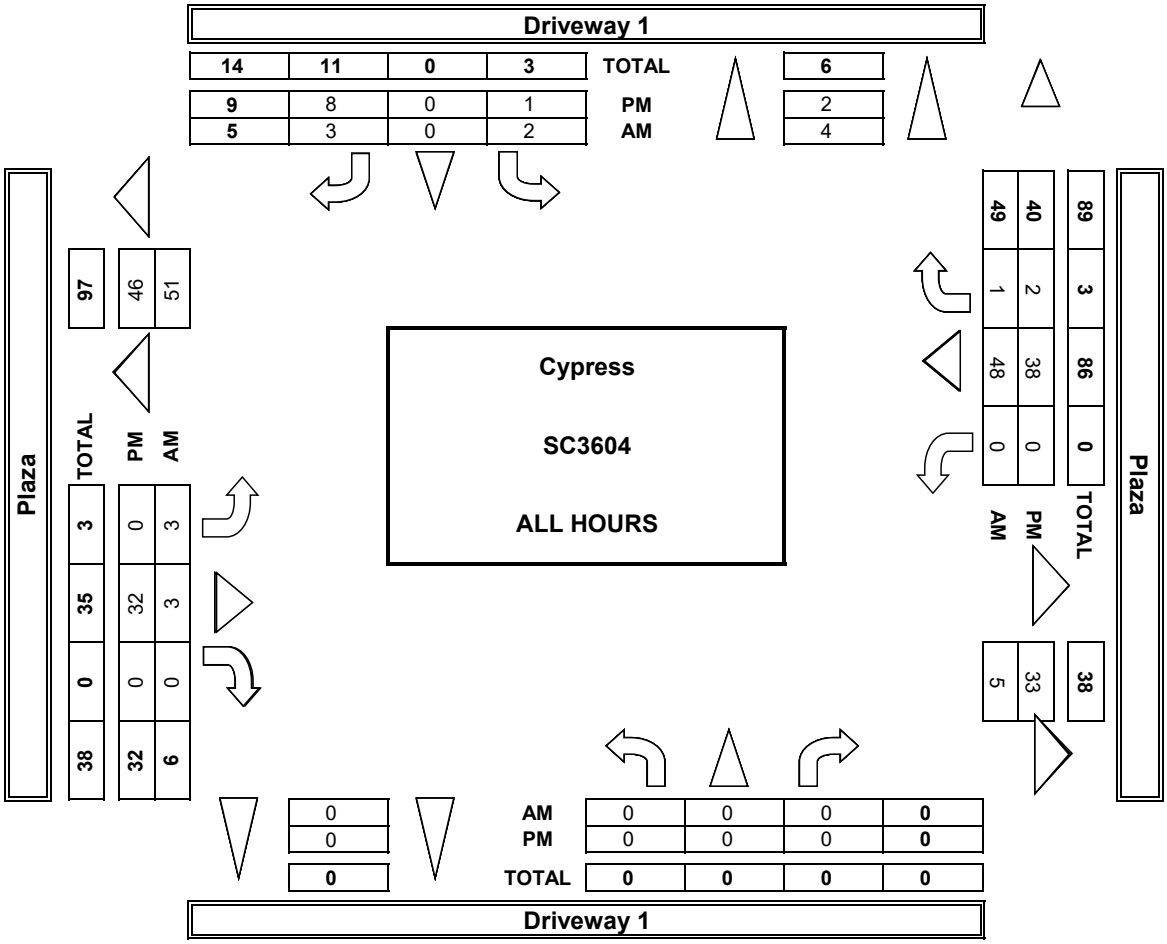
		ALL PED AND BIKE				
		E SIDE	W SIDE	S SIDE	N SIDE	TOTAL
AM	7:00 AM	0	0	0	0	0
	7:15 AM	0	0	0	0	0
	7:30 AM	0	0	0	0	0
	7:45 AM	0	0	0	0	0
	8:00 AM	0	0	0	0	0
	8:15 AM	0	0	0	0	0
	8:30 AM	0	0	0	0	0
	8:45 AM	0	0	0	0	0
	TOTAL	0	0	0	0	0
PM	4:00 PM	0	0	0	0	0
	4:15 PM	0	0	0	0	0
	4:30 PM	0	0	0	0	0
	4:45 PM	0	0	0	0	0
	5:00 PM	0	0	0	0	0
	5:15 PM	0	0	0	0	0
	5:30 PM	0	0	0	0	0
	5:45 PM	0	0	0	0	0
	TOTAL	0	0	0	0	0

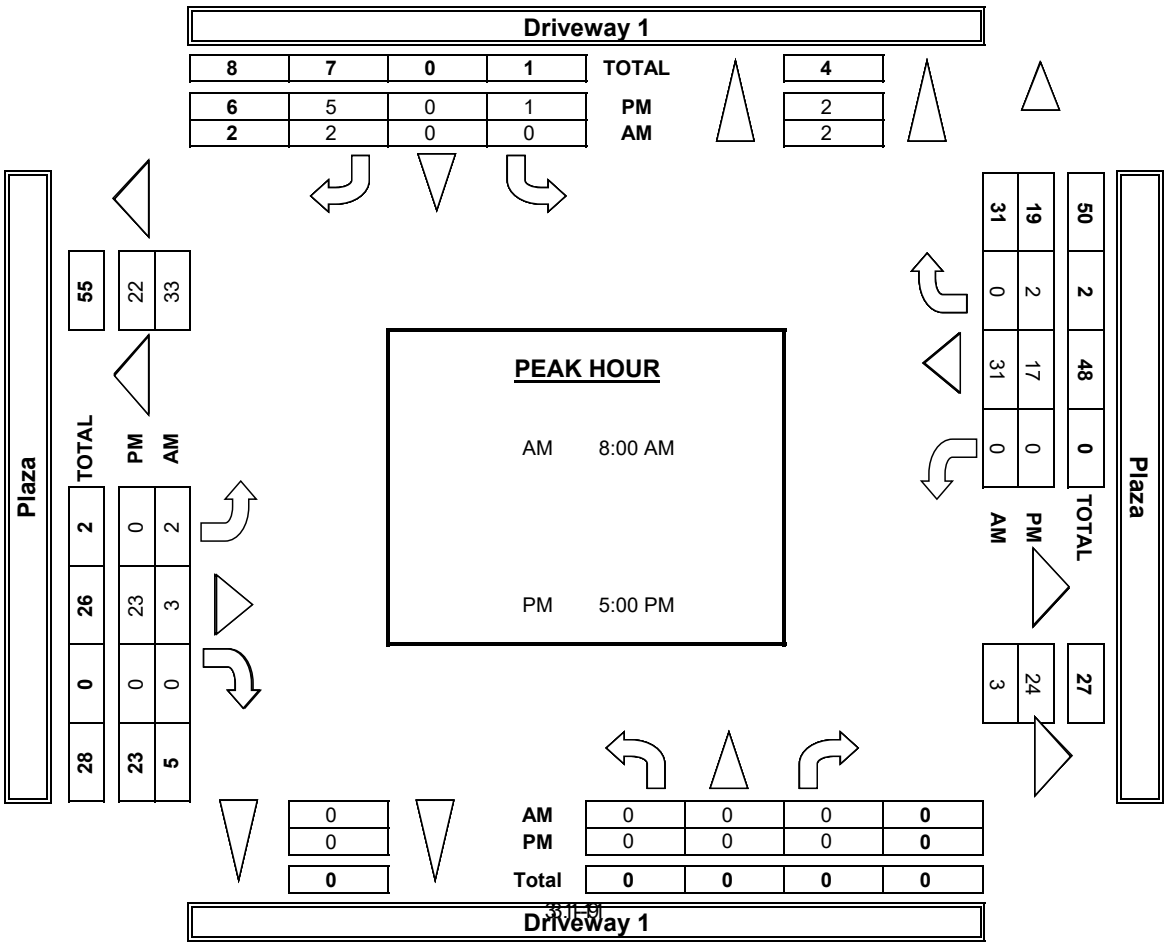
PEDESTRIAN CROSSINGS				
E SIDE	W SIDE	S SIDE	N SIDE	TOTAL
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0

BICYCLE CROSSINGS				
ES	WS	SS	NS	TOTAL
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0

AimTD LLC

TURNING MOVEMENT COUNTS





INTERSECTION TURNING MOVEMENT COUNTS

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE:	LOCATION:	Cypress	PROJECT #:	SC3604
8/30/22	NORTH & SOUTH:	Driveway 1	LOCATION #:	2
TUESDAY	EAST & WEST:	Plaza	CONTROL:	NO CONTROL

CLASS 2: 2-AXLE WORK VEHICLES/ TRUCKS

NOTES:

AM / PM / MD / OTHER / OTHER — ▲ N ◄ W E ► S ▼

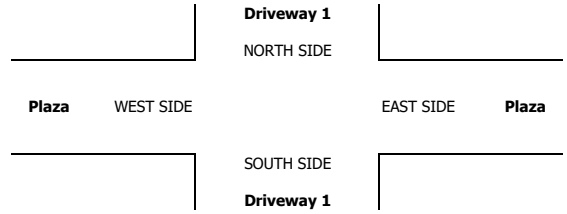
		NORTHBOUND Driveway 1			SOUTHBOUND Driveway 1			EASTBOUND Plaza			WESTBOUND Plaza			
	LANES:	NL X	NT X	NR X	SL 0	ST X	SR 0	EL 0	ET 1	ER X	WL X	WT 1	WR 0	TOTAL
AM	7:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	7:15 AM	0	0	0	0	0	0	1	0	0	0	0	0	1
	7:30 AM	0	0	0	0	0	1	0	0	0	0	0	0	1
	7:45 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	8:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	8:15 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	8:30 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	8:45 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	VOLUMES	0	0	0	0	0	1	1	0	0	0	0	0	2
	APPROACH %	0%	0%	0%	0%	0%	100%	100%	0%	0%	0%	0%	0%	
	APP/DEPART	0	/	1	1	/	0	1	/	0	0	/	1	0
	BEGIN PEAK HR		8:00 AM											
	VOLUMES	0	0	0	0	0	0	0	0	0	0	0	0	0
	APPROACH %	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	PEAK HR FACTOR		0.000			0.000			0.000			0.000		0.000
	APP/DEPART	0	/	0	0	/	0	0	/	0	0	/	0	0
PM	4:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	4:15 PM	0	0	0	0	0	0	0	1	0	0	0	0	1
	4:30 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	4:45 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	5:00 PM	0	0	0	0	0	0	0	0	0	0	1	0	1
	5:15 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	5:30 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	5:45 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	VOLUMES	0	0	0	0	0	0	0	1	0	0	1	0	2
	APPROACH %	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	100%	0%	
	APP/DEPART	0	/	0	0	/	0	1	/	1	1	/	1	0
	BEGIN PEAK HR		5:00 PM											
	VOLUMES	0	0	0	0	0	0	0	0	0	0	1	0	1
	APPROACH %	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0%	
	PEAK HR FACTOR		0.000			0.000			0.000			0.250		0.250
	APP/DEPART	0	/	0	0	/	0	0	/	0	1	/	1	0

U-TURNS

NB	SB	EB	WB	TTL
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0

RTOR

NRR X	SRR X	ERR X	WRR X
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0



INTERSECTION TURNING MOVEMENT COUNTS

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE:	LOCATION:	Cypress	PROJECT #:	SC3604
8/30/22	NORTH & SOUTH:	Driveway 1	LOCATION #:	2
TUESDAY	EAST & WEST:	Plaza	CONTROL:	NO CONTROL

CLASS 3: 3-AXLE TRUCKS

NOTES:

AM / PM / MD / OTHER / OTHER — ▲ N, ◄ W, E ►, S ▼

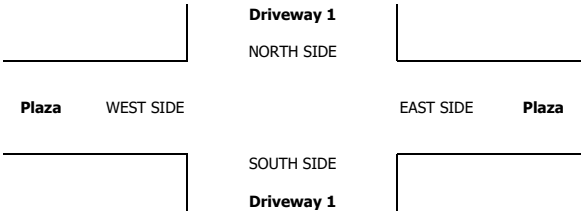
		NORTHBOUND Driveway 1			SOUTHBOUND Driveway 1			EASTBOUND Plaza			WESTBOUND Plaza			
	LANES:	NL X	NT X	NR X	SL 0	ST X	SR 0	EL 0	ET 1	ER X	WL X	WT 1	WR 0	TOTAL
AM	7:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	7:15 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	7:30 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	7:45 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	8:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	8:15 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	8:30 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	8:45 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	VOLUMES	0	0	0	0	0	0	0	0	0	0	0	0	0
	APPROACH %	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	APP/DEPART	0	/	0	0	/	0	0	/	0	0	/	0	0
	BEGIN PEAK HR		8:00 AM											
	VOLUMES	0	0	0	0	0	0	0	0	0	0	0	0	0
	APPROACH %	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	PEAK HR FACTOR		0.000			0.000			0.000			0.000		0.000
	APP/DEPART	0	/	0	0	/	0	0	/	0	0	/	0	0
PM	4:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	4:15 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	4:30 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	4:45 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	5:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	5:15 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	5:30 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	5:45 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	VOLUMES	0	0	0	0	0	0	0	0	0	0	0	0	0
	APPROACH %	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	APP/DEPART	0	/	0	0	/	0	0	/	0	0	/	0	0
	BEGIN PEAK HR		5:00 PM											
	VOLUMES	0	0	0	0	0	0	0	0	0	0	0	0	0
	APPROACH %	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	PEAK HR FACTOR		0.000			0.000			0.000			0.000		0.000
	APP/DEPART	0	/	0	0	/	0	0	/	0	0	/	0	0

U-TURNS

NB	SB	EB	WB	TTL
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0

RTOR

NRR X	SRR X	ERR X	WRR X
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0



INTERSECTION TURNING MOVEMENT COUNTS

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE:	LOCATION:	Cypress	PROJECT #:	SC3604
8/30/22	NORTH & SOUTH:	Driveway 1	LOCATION #:	2
TUESDAY	EAST & WEST:	Plaza	CONTROL:	NO CONTROL

CLASS 4: 4 OR MORE AXLE TRUCKS

NOTES:

AM / PM / MD / OTHER / OTHER — ▲ N, ◄ W, E ►, S ▼

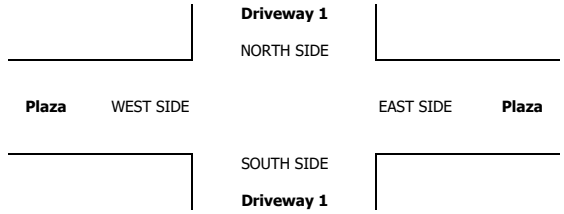
	NORTHBOUND Driveway 1			SOUTHBOUND Driveway 1			EASTBOUND Plaza			WESTBOUND Plaza			
LANES:	NL X	NT X	NR X	SL 0	ST X	SR 0	EL 0	ET 1	ER X	WL X	WT 1	WR 0	TOTAL
7:00 AM	0	0	0	1	0	0	0	0	0	0	0	0	1
7:15 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
7:30 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
7:45 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
8:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
8:15 AM	0	0	0	0	0	1	0	0	0	0	0	0	1
8:30 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
8:45 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
AM VOLUMES	0	0	0	1	0	1	0	0	0	0	0	0	2
AM APPROACH %	0%	0%	0%	50%	0%	50%	0%	0%	0%	0%	0%	0%	
AM APP/DEPART	0	/	0	2	/	0	0	/	1	0	/	1	0
BEGIN PEAK HR		8:00 AM											
AM VOLUMES	0	0	0	0	0	1	0	0	0	0	0	0	1
AM APPROACH %	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	
PEAK HR FACTOR		0.000			0.250			0.000			0.000		0.250
AM APP/DEPART	0	/	0	1	/	0	0	/	0	0	/	1	0
4:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
4:15 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
4:30 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
4:45 PM	0	0	0	0	0	1	0	0	0	0	0	0	1
5:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
5:15 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
5:30 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
5:45 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
PM VOLUMES	0	0	0	0	0	1	0	0	0	0	0	0	1
PM APPROACH %	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	
PM APP/DEPART	0	/	0	1	/	0	0	/	0	0	/	1	0
BEGIN PEAK HR		5:00 PM											
PM VOLUMES	0	0	0	0	0	0	0	0	0	0	0	0	0
PM APPROACH %	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
PEAK HR FACTOR		0.000			0.000			0.000			0.000		0.000
PM APP/DEPART	0	/	0	0	/	0	0	/	0	0	/	0	0

U-TURNS

NB	SB	EB	WB	TTL
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0

RTOR

NRR X	SRR X	ERR X	WRR X
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0



T42321

INTERSECTION TURNING MOVEMENT COUNTS

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE: Tue, Aug 30, 22

LOCATION: Cypress
NORTH & SOUTH: McDonnell
EAST & WEST: Plaza

PROJECT #: SC3604
LOCATION #: 4
CONTROL: STOP N

NOTES:

AM / PM / MD / OTHER / OTHER — ▲ N ◄ W E ► S ▼

Add U-Turns to Left Turns

		NORTHBOUND (McDonnell)			SOUTHBOUND (McDonnell)			EASTBOUND (Plaza)			WESTBOUND (Plaza)			
	LANES:	NL 0	NT 1	NR 0	SL 0	ST 1	SR 0	EL 0	ET 1	ER 0	WL 0	WT 1	WR 0	TOTAL
AM	7:00 AM	4	1	5	0	0	0	0	2	0	1	10	0	23
	7:15 AM	7	0	2	0	0	0	0	0	0	1	7	0	17
	7:30 AM	2	0	2	0	0	0	0	1	0	0	5	0	10
	7:45 AM	4	0	10	0	0	0	0	0	0	3	9	1	27
	8:00 AM	8	1	6	0	0	0	0	1	0	2	14	0	32
	8:15 AM	3	0	9	0	0	0	0	0	0	1	15	0	28
	8:30 AM	4	1	7	0	0	0	0	2	0	0	8	0	22
	8:45 AM	1	0	5	0	0	0	0	2	0	0	8	0	16
	VOLUMES	33	3	46	0	0	0	0	8	0	8	76	1	175
	APPROACH %	40%	4%	56%	0%	0%	0%	0%	100%	0%	9%	89%	1%	
	APP/DEPART	82	/	4	0	/	23	8	/	54	85	/	94	0
	BEGIN PEAK HR		7:45 AM											
	VOLUMES	19	2	32	0	0	0	0	3	0	6	46	1	109
	APPROACH %	36%	4%	60%	0%	0%	0%	0%	100%	0%	11%	87%	2%	
	PEAK HR FACTOR		0.883			0.000			0.375			0.828		0.852
	APP/DEPART	53	/	3	0	/	12	3	/	35	53	/	59	0
PM	4:00 PM	3	0	0	1	0	0	0	9	1	0	6	0	20
	4:15 PM	2	0	1	0	0	0	1	8	2	1	1	0	16
	4:30 PM	0	0	4	0	0	0	0	10	0	1	1	0	16
	4:45 PM	1	0	0	0	0	0	0	4	0	1	5	0	11
	5:00 PM	1	0	0	0	1	0	0	22	1	5	4	0	34
	5:15 PM	1	0	2	0	0	0	0	8	0	1	5	0	17
	5:30 PM	3	0	4	0	0	0	0	8	0	3	5	0	23
	5:45 PM	0	0	3	0	0	0	0	5	1	2	0	0	11
	VOLUMES	11	0	14	1	1	0	1	74	5	14	27	0	148
	APPROACH %	44%	0%	56%	50%	50%	0%	1%	93%	6%	34%	66%	0%	
	APP/DEPART	25	/	1	2	/	26	80	/	89	41	/	32	0
	BEGIN PEAK HR		4:45 PM											
	VOLUMES	5	0	9	0	1	0	0	43	2	11	14	0	85
	APPROACH %	36%	0%	64%	0%	100%	0%	0%	96%	4%	44%	56%	0%	
	PEAK HR FACTOR		0.500			0.250			0.489			0.694		0.625
	APP/DEPART	14	/	0	1	/	19	45	/	52	25	/	14	0

U-TURNS

NB 0	SB 0	EB 0	WB 0	TTL
3	0	0	0	3
4	0	0	0	4
2	0	0	0	2
1	0	0	0	1
1	0	0	0	1
2	0	0	0	2
2	0	0	0	2
0	0	0	0	0
15	0	0	0	15
1	0	0	0	1
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
1	0	0	0	1
1	0	0	0	1
3	0	0	0	3
0	0	0	0	0
6	0	0	0	6

RTOR

NRR X	SRR X	ERR X	WRR X
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0

McDonnell
NORTH SIDE

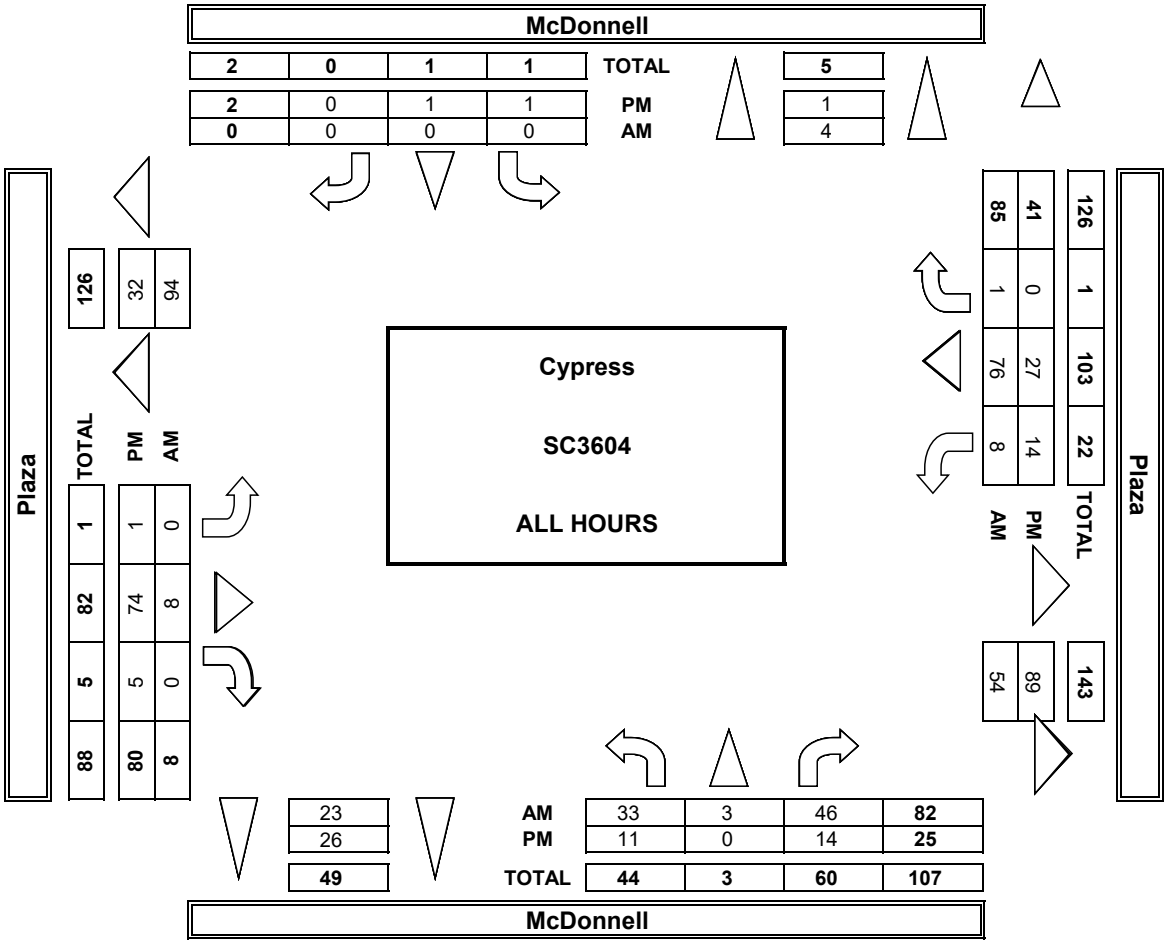
Plaza WEST SIDE — EAST SIDE **Plaza**

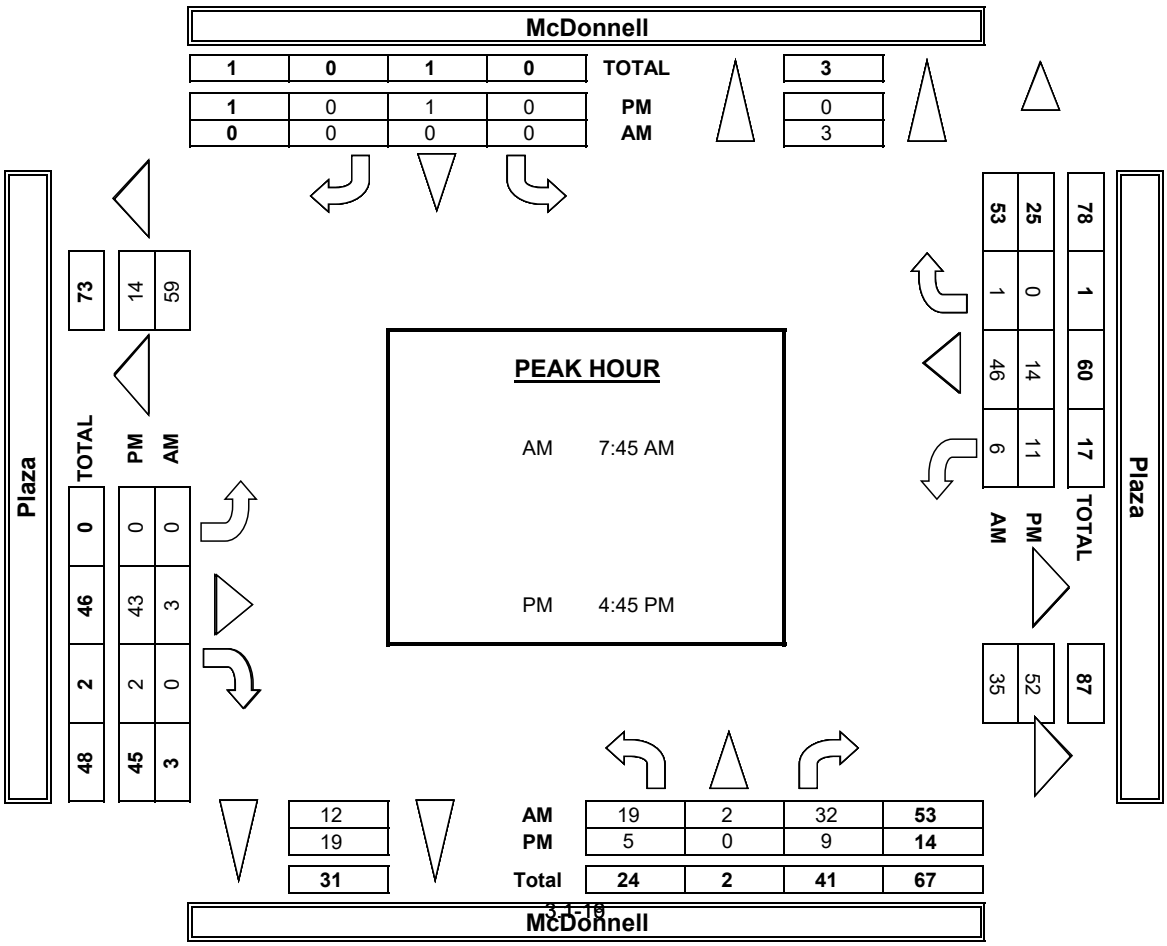
SOUTH SIDE
McDonnell

		ALL PED AND BIKE					PEDESTRIAN CROSSINGS					BICYCLE CROSSINGS				
		E SIDE	W SIDE	S SIDE	N SIDE	TOTAL	E SIDE	W SIDE	S SIDE	N SIDE	TOTAL	ES	WS	SS	NS	TOTAL
AM	7:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	7:15 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	7:30 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	7:45 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	8:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	8:15 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	8:30 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	8:45 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	TOTAL	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
PM	4:00 PM	1	0	0	0	1	1	0	0	0	1	0	0	0	0	0
	4:15 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	4:30 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	4:45 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	5:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	5:15 PM	0	0	1	0	1	0	0	0	0	0	0	0	1	0	1
	5:30 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	5:45 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	TOTAL	1	0	1	0	2	1	0	0	0	1	0	0	1	0	1

AimTD LLC

TURNING MOVEMENT COUNTS





INTERSECTION TURNING MOVEMENT COUNTS

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE:	LOCATION:	Cypress	PROJECT #:	SC3604
8/30/22	NORTH & SOUTH:	McDonnell	LOCATION #:	4
TUESDAY	EAST & WEST:	Plaza	CONTROL:	STOP N

CLASS 2: 2-AXLE WORK VEHICLES/ TRUCKS

NOTES:

AM / PM / MD / OTHER / OTHER — ▲ N, ◄ W, E ►, S ▼

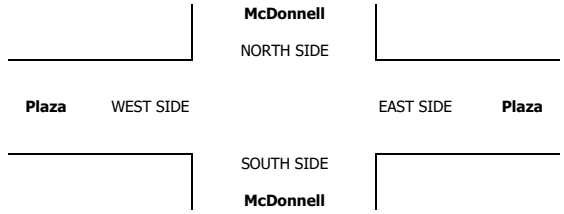
		NORTHBOUND McDonnell			SOUTHBOUND McDonnell			EASTBOUND Plaza			WESTBOUND Plaza			
	LANES:	NL 0	NT 1	NR 0	SL 0	ST 1	SR 0	EL 0	ET 1	ER 0	WL 0	WT 1	WR 0	TOTAL
AM	7:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	7:15 AM	0	0	0	0	0	0	0	0	0	1	0	0	1
	7:30 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	7:45 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	8:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	8:15 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	8:30 AM	0	0	0	0	0	0	0	1	0	0	0	0	1
	8:45 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	VOLUMES	0	0	0	0	0	0	0	1	0	1	0	0	2
	APPROACH %	0%	0%	0%	0%	0%	0%	0%	100%	0%	100%	0%	0%	
	APP/DEPART	0	/	0	0	/	1	1	/	1	1	/	0	0
	BEGIN PEAK HR		7:45 AM											
	VOLUMES	0	0	0	0	0	0	0	1	0	0	0	0	1
	APPROACH %	0%	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	
	PEAK HR FACTOR		0.000			0.000			0.250			0.000		0.250
	APP/DEPART	0	/	0	0	/	0	1	/	1	0	/	0	0
PM	4:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	4:15 PM	0	0	0	0	0	0	1	0	0	0	0	0	1
	4:30 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	4:45 PM	0	0	0	0	0	0	0	0	0	0	1	0	1
	5:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	5:15 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	5:30 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	5:45 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	VOLUMES	0	0	0	0	0	0	1	0	0	0	1	0	2
	APPROACH %	0%	0%	0%	0%	0%	0%	100%	0%	0%	0%	100%	0%	
	APP/DEPART	0	/	1	0	/	0	1	/	0	1	/	1	0
	BEGIN PEAK HR		4:45 PM											
	VOLUMES	0	0	0	0	0	0	0	0	0	0	1	0	1
	APPROACH %	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0%	
	PEAK HR FACTOR		0.000			0.000			0.000			0.250		0.250
	APP/DEPART	0	/	0	0	/	0	0	/	0	1	/	1	0

U-TURNS

NB	SB	EB	WB	TTL
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0

RTOR

NRR	SRR	ERR	WRR
X	X	X	X
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
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0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0



INTERSECTION TURNING MOVEMENT COUNTS

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE:	LOCATION:	Cypress	PROJECT #:	SC3604
8/30/22	NORTH & SOUTH:	McDonnell	LOCATION #:	4
TUESDAY	EAST & WEST:	Plaza	CONTROL:	STOP N

CLASS 3: 3-AXLE TRUCKS

NOTES:

AM / PM / MD / OTHER / OTHER — ▲ N, ◄ W, E ►, S ▼

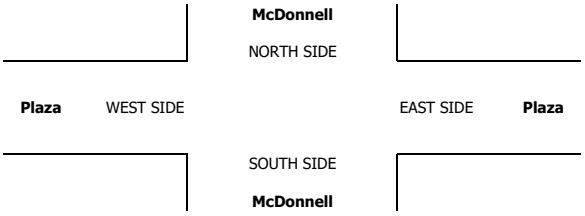
	NORTHBOUND (McDonnell)			SOUTHBOUND (McDonnell)			EASTBOUND (Plaza)			WESTBOUND (Plaza)			
LANES:	NL 0	NT 1	NR 0	SL 0	ST 1	SR 0	EL 0	ET 1	ER 0	WL 0	WT 1	WR 0	TOTAL
AM													
7:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
7:15 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
7:30 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
7:45 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
8:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
8:15 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
8:30 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
8:45 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
VOLUMES	0	0	0	0	0	0	0	0	0	0	0	0	0
APPROACH %	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
APP/DEPART	0	/	0	0	/	0	0	/	0	0	/	0	0
BEGIN PEAK HR		7:45 AM											
VOLUMES	0	0	0	0	0	0	0	0	0	0	0	0	0
APPROACH %	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
PEAK HR FACTOR		0.000			0.000			0.000			0.000		0.000
APP/DEPART	0	/	0	0	/	0	0	/	0	0	/	0	0
PM													
4:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
4:15 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
4:30 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
4:45 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
5:15 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
5:30 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
5:45 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
VOLUMES	0	0	0	0	0	0	0	0	0	0	0	0	0
APPROACH %	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
APP/DEPART	0	/	0	0	/	0	0	/	0	0	/	0	0
BEGIN PEAK HR		4:45 PM											
VOLUMES	0	0	0	0	0	0	0	0	0	0	0	0	0
APPROACH %	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
PEAK HR FACTOR		0.000			0.000			0.000			0.000		0.000
APP/DEPART	0	/	0	0	/	0	0	/	0	0	/	0	0

U-TURNS

NB	SB	EB	WB	TTL
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0

RTOR

NRR X	SRR X	ERR X	WRR X
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0



INTERSECTION TURNING MOVEMENT COUNTS

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE:	LOCATION:	Cypress	PROJECT #:	SC3604
8/30/22	NORTH & SOUTH:	McDonnell	LOCATION #:	4
TUESDAY	EAST & WEST:	Plaza	CONTROL:	STOP N

CLASS 4: 4 OR MORE AXLE TRUCKS

NOTES:

AM / PM / MD / OTHER / OTHER — ▲ N, ◄ W, E ►, S ▼

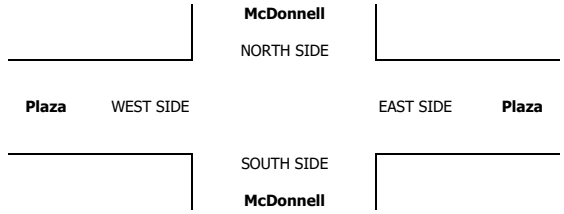
		NORTHBOUND (McDonnell)			SOUTHBOUND (McDonnell)			EASTBOUND (Plaza)			WESTBOUND (Plaza)			
	LANES:	NL 0	NT 1	NR 0	SL 0	ST 1	SR 0	EL 0	ET 1	ER 0	WL 0	WT 1	WR 0	TOTAL
AM	7:00 AM	0	0	0	0	0	0	0	1	0	0	0	0	1
	7:15 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	7:30 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	7:45 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	8:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	8:15 AM	0	0	1	0	0	0	0	0	0	1	0	0	2
	8:30 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	8:45 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	VOLUMES	0	0	1	0	0	0	0	1	0	1	0	0	3
	APPROACH %	0%	0%	100%	0%	0%	0%	0%	100%	0%	100%	0%	0%	
	APP/DEPART	1	/	0	0	/	1	1	/	2	1	/	0	0
	BEGIN PEAK HR		7:45 AM											
	VOLUMES	0	0	1	0	0	0	0	0	0	1	0	0	2
	APPROACH %	0%	0%	100%	0%	0%	0%	0%	0%	0%	100%	0%	0%	
	PEAK HR FACTOR		0.250			0.000			0.000			0.250		0.250
	APP/DEPART	1	/	0	0	/	1	0	/	1	1	/	0	0
PM	4:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	4:15 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	4:30 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	4:45 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	5:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	5:15 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	5:30 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	5:45 PM	0	0	0	0	0	0	0	0	0	0	0	0	0
	VOLUMES	0	0	0	0	0	0	0	0	0	0	0	0	0
	APPROACH %	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	APP/DEPART	0	/	0	0	/	0	0	/	0	0	/	0	0
	BEGIN PEAK HR		4:45 PM											
	VOLUMES	0	0	0	0	0	0	0	0	0	0	0	0	0
	APPROACH %	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	PEAK HR FACTOR		0.000			0.000			0.000			0.000		0.000
	APP/DEPART	0	/	0	0	/	0	0	/	0	0	/	0	0

U-TURNS

NB	SB	EB	WB	TTL
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0

RTOR

NRR X	SRR X	ERR X	WRR X
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0



T42321

INTERSECTION TURNING MOVEMENT COUNTS

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE:			
Tue, Aug 30, 22	LOCATION:	Cypress	PROJECT #: SC3604
	NORTH & SOUTH:	Valley View	LOCATION #: 7
	EAST & WEST:	Plaza	CONTROL: SIGNAL

NOTES:

AM / PM / MD / OTHER / OTHER — ▲ N, ◄ W, E ►, S ▼

Add U-Turns to Left Turns

		NORTHBOUND (Valley View)			SOUTHBOUND (Valley View)			EASTBOUND (Plaza)			WESTBOUND (Plaza)			
	LANES:	NL 1	NT 3	NR 0	SL 1	ST 3	SR 0	EL 1	ET 1	ER 0	WL 1	WT 1	WR 0	TOTAL
AM	7:00 AM	4	236	14	19	353	12	2	1	0	0	0	1	642
AM	7:15 AM	1	297	9	23	347	12	3	1	0	0	0	1	694
AM	7:30 AM	3	336	16	26	383	9	2	0	2	0	0	1	778
AM	7:45 AM	2	363	10	25	366	17	2	0	4	0	0	5	794
AM	8:00 AM	3	377	17	30	339	17	0	1	5	3	0	0	792
AM	8:15 AM	5	344	16	16	366	26	0	0	3	0	0	2	778
AM	8:30 AM	1	360	16	12	387	16	1	0	2	1	0	5	801
AM	8:45 AM	1	293	11	21	310	13	2	1	1	2	0	3	658
AM	VOLUMES	20	2,606	109	172	2,851	122	12	4	17	6	0	18	5,937
AM	APPROACH %	1%	95%	4%	5%	91%	4%	36%	12%	52%	25%	0%	75%	
AM	APP/DEPART	2,735	/	2,640	3,145	/	2,879	33	/	281	24	/	137	0
	BEGIN PEAK HR		7:45 AM											
	VOLUMES	11	1,444	59	83	1,458	76	3	1	14	4	0	12	3,165
	APPROACH %	1%	95%	4%	5%	90%	5%	17%	6%	78%	25%	0%	75%	
	PEAK HR FACTOR		0.953			0.974			0.750			0.667		0.988
	APP/DEPART	1,514	/	1,462	1,617	/	1,479	18	/	140	16	/	84	0
PM	4:00 PM	3	422	1	6	358	10	18	0	6	10	1	17	852
PM	4:15 PM	1	465	5	1	299	2	12	1	6	6	0	22	820
PM	4:30 PM	0	457	2	5	393	5	14	0	7	14	0	32	929
PM	4:45 PM	0	477	0	4	349	8	10	0	6	13	2	16	885
PM	5:00 PM	3	490	2	3	363	4	34	0	12	17	6	27	961
PM	5:15 PM	1	470	0	4	350	6	21	0	3	7	1	41	904
PM	5:30 PM	1	439	0	1	342	8	20	0	4	10	0	48	873
PM	5:45 PM	1	527	0	0	325	4	6	0	6	3	0	20	892
PM	VOLUMES	10	3,747	10	24	2,779	47	135	1	50	80	10	223	7,116
PM	APPROACH %	0%	99%	0%	1%	98%	2%	73%	1%	27%	26%	3%	71%	
PM	APP/DEPART	3,767	/	4,110	2,850	/	2,913	186	/	30	313	/	63	0
	BEGIN PEAK HR		4:30 PM											
	VOLUMES	4	1,894	4	16	1,455	23	79	0	28	51	9	116	3,679
	APPROACH %	0%	100%	0%	1%	97%	2%	74%	0%	26%	29%	5%	66%	
	PEAK HR FACTOR		0.961			0.927			0.582			0.880		0.957
	APP/DEPART	1,902	/	2,092	1,494	/	1,535	107	/	17	176	/	35	0

U-TURNS

NB 0	SB 0	EB 0	WB 0	TTL
1	0	0	0	1
0	0	0	0	0
1	1	0	0	2
0	0	0	0	0
1	1	0	0	2
2	1	0	0	3
0	1	0	0	1
0	0	0	0	0
5	4	0	0	9
1	2	0	0	3
0	0	0	0	0
0	3	0	0	3
0	0	0	0	0
1	0	0	0	1
0	0	0	0	0
1	0	0	0	1
4	5	0	0	9

RTOR

NRR 0	SRR 0	ERR 0	WRR 0
3	1	0	0
2	0	0	0
1	0	2	1
0	1	1	2
1	0	2	0
0	1	1	1
1	1	1	3
0	0	1	1
8	4	8	8
2	3	5	6
0	0	4	8
0	0	5	15
0	0	4	18
0	2	4	11
0	0	9	9
0	1	2	19
0	1	3	27
0	0	6	16
0	4	37	123
0	3	19	57

Valley View

NORTH SIDE

Plaza WEST SIDE EAST SIDE **Plaza**

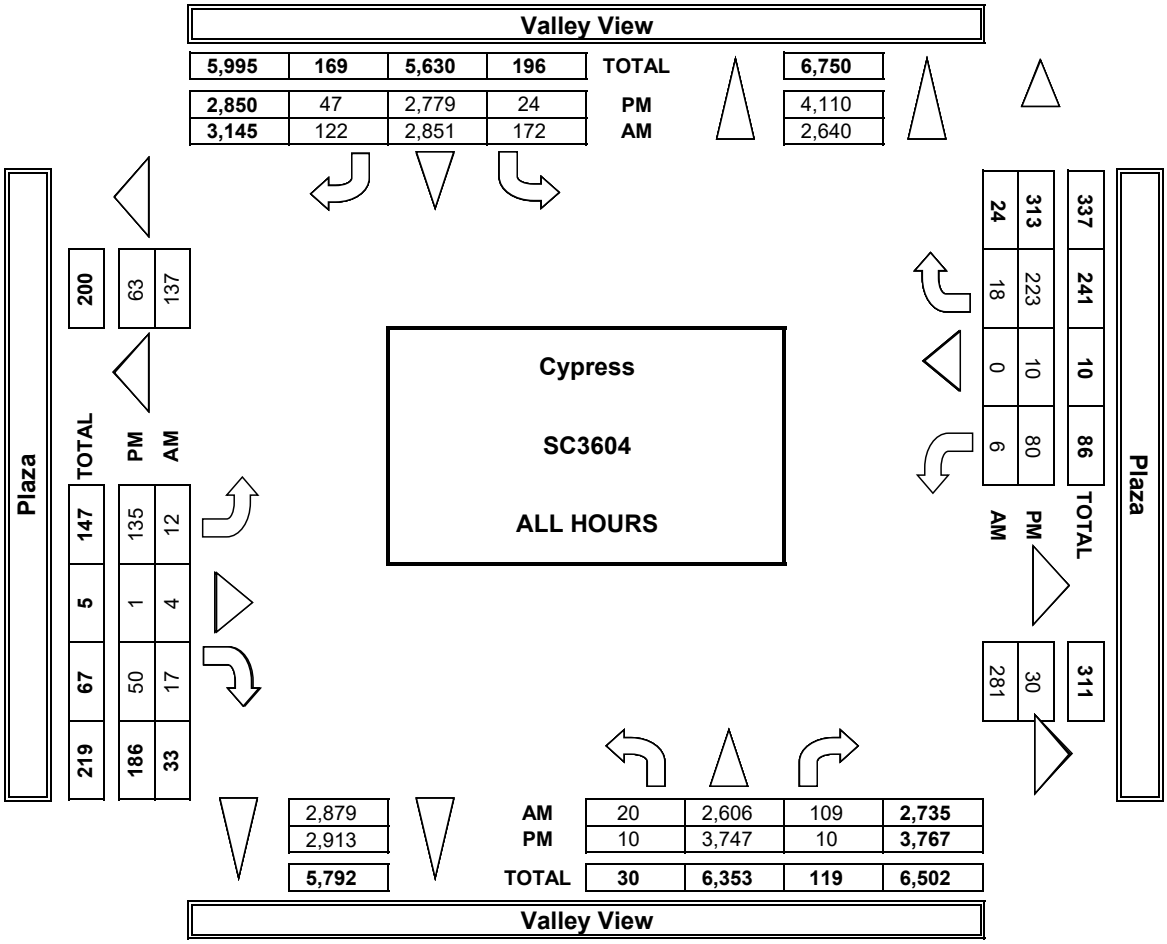
SOUTH SIDE

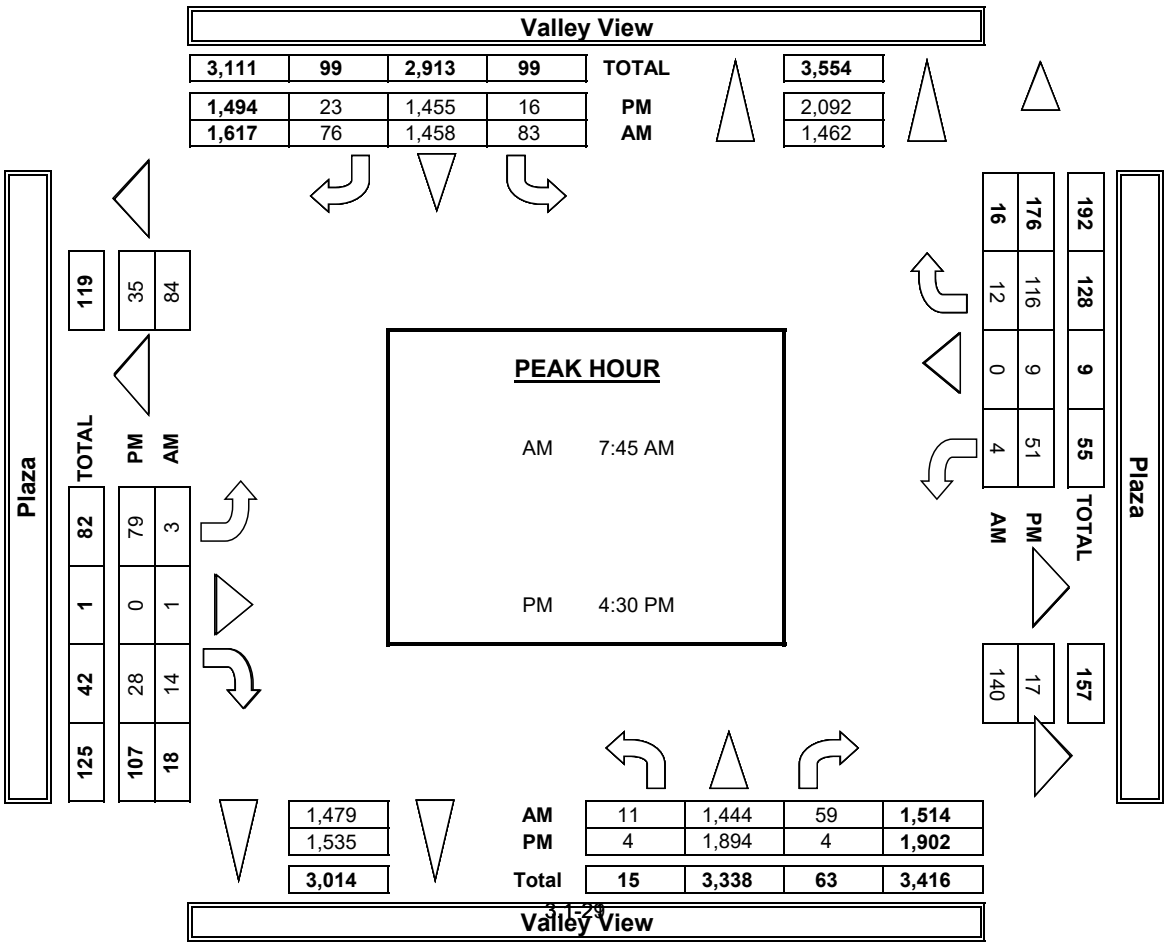
Valley View

		ALL PED AND BIKE					PEDESTRIAN CROSSINGS					BICYCLE CROSSINGS				
		E SIDE	W SIDE	S SIDE	N SIDE	TOTAL	E SIDE	W SIDE	S SIDE	N SIDE	TOTAL	ES	WS	SS	NS	TOTAL
AM	7:00 AM	4	1	1	0	6	3	1	1	0	5	1	0	0	0	1
AM	7:15 AM	1	1	0	0	2	0	1	0	0	1	1	0	0	0	1
AM	7:30 AM	1	0	0	0	1	1	0	0	0	1	0	0	0	0	0
AM	7:45 AM	2	2	1	0	5	0	2	1	0	3	2	0	0	0	2
AM	8:00 AM	0	0	1	0	1	0	0	1	0	1	0	0	0	0	0
AM	8:15 AM	1	0	0	0	1	1	0	0	0	1	0	0	0	0	0
AM	8:30 AM	2	0	1	0	3	2	0	1	0	3	0	0	0	0	0
AM	8:45 AM	2	0	0	0	2	2	0	0	0	2	0	0	0	0	0
AM	TOTAL	13	4	4	0	21	9	4	4	0	17	4	0	0	0	4
PM	4:00 PM	0	3	0	0	3	0	0	0	0	0	0	3	0	0	3
PM	4:15 PM	1	0	0	0	1	1	0	0	0	1	0	0	0	0	0
PM	4:30 PM	1	0	0	0	1	1	0	0	0	1	0	0	0	0	0
PM	4:45 PM	0	4	1	0	5	0	2	1	0	3	0	2	0	0	2
PM	5:00 PM	1	3	0	0	4	0	2	0	0	2	1	1	0	0	2
PM	5:15 PM	0	1	0	0	1	0	1	0	0	1	0	0	0	0	0
PM	5:30 PM	1	1	1	0	3	0	1	0	0	1	1	0	1	0	2
PM	5:45 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	TOTAL	4	12	2	0	18	2	6	1	0	9	2	6	1	0	9

AimTD LLC

TURNING MOVEMENT COUNTS





INTERSECTION TURNING MOVEMENT COUNTS

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE:	LOCATION:	Cypress	PROJECT #:	SC3604
8/30/22	NORTH & SOUTH:	Valley View	LOCATION #:	7
TUESDAY	EAST & WEST:	Plaza	CONTROL:	SIGNAL

CLASS 2: 2-AXLE WORK VEHICLES/ TRUCKS

NOTES:

AM / PM / MD / OTHER / OTHER — ▲ N, ◄ W, E ►, S ▼

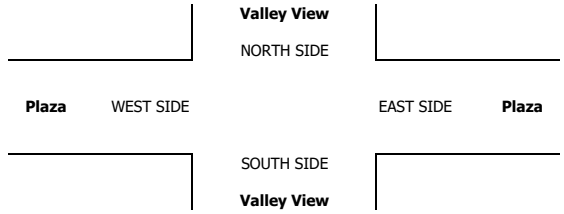
		NORTHBOUND Valley View			SOUTHBOUND Valley View			EASTBOUND Plaza			WESTBOUND Plaza			
	LANES:	NL 1	NT 3	NR 0	SL 1	ST 3	SR 0	EL 1	ET 1	ER 0	WL 1	WT 1	WR 0	TOTAL
AM	7:00 AM	0	6	0	0	17	1	0	0	0	0	0	0	24
	7:15 AM	0	11	0	1	17	1	0	0	0	0	0	0	30
	7:30 AM	0	10	0	0	22	0	0	0	0	0	0	0	32
	7:45 AM	0	12	0	0	11	0	0	0	0	0	0	0	23
	8:00 AM	0	12	0	0	18	0	0	0	0	0	0	0	30
	8:15 AM	2	10	0	0	15	0	0	0	1	0	0	1	29
	8:30 AM	0	17	0	0	18	1	0	0	0	0	0	0	36
	8:45 AM	0	9	1	2	16	0	0	0	0	0	0	0	28
	VOLUMES	2	87	1	3	134	3	0	0	1	0	0	1	232
	APPROACH %	2%	97%	1%	2%	96%	2%	0%	0%	100%	0%	0%	100%	
	APP/DEPART	90	/	88	140	/	136	1	/	4	1	/	4	0
	BEGIN PEAK HR		7:45 AM											
	VOLUMES	1	51	0	0	62	1	0	0	1	0	0	1	118
	APPROACH %	2%	96%	0%	0%	98%	2%	0%	0%	100%	0%	0%	100%	
	PEAK HR FACTOR		0.779			0.829			0.250			0.250		0.819
	APP/DEPART	53	/	52	63	/	64	1	/	0	1	/	2	0
PM	4:00 PM	1	12	0	1	10	1	0	0	0	0	0	0	25
	4:15 PM	0	12	2	0	7	0	0	1	0	0	0	1	23
	4:30 PM	0	11	0	0	7	0	0	0	0	0	0	0	18
	4:45 PM	0	10	0	0	5	0	0	0	1	0	1	0	17
	5:00 PM	0	7	0	0	1	0	0	0	0	0	0	0	8
	5:15 PM	0	5	0	2	5	0	0	0	0	0	0	0	12
	5:30 PM	0	6	0	0	8	0	0	0	0	0	0	0	14
	5:45 PM	0	11	0	0	5	0	0	0	0	0	0	0	16
	VOLUMES	1	74	2	3	48	1	0	1	1	0	1	1	133
	APPROACH %	1%	96%	3%	6%	92%	2%	0%	50%	50%	0%	50%	50%	
	APP/DEPART	77	/	75	52	/	49	2	/	6	2	/	3	0
	BEGIN PEAK HR		4:30 PM											
	VOLUMES	0	33	0	2	18	0	0	0	1	0	1	0	55
	APPROACH %	0%	100%	0%	10%	90%	0%	0%	0%	100%	0%	100%	0%	
	PEAK HR FACTOR		0.750			0.714			0.250			0.250		0.764
	APP/DEPART	33	/	33	20	/	19	1	/	2	1	/	1	0

U-TURNS

NB	SB	EB	WB	TTL
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
1	0	0	0	1
0	0	0	0	0
0	0	0	0	0
1	0	0	0	1
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0

RTOR

NRR	SRR	ERR	WRR
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	1	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	1
0	0	0	0
0	0	1	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	1	1



INTERSECTION TURNING MOVEMENT COUNTS

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE:	LOCATION:	Cypress	PROJECT #:	SC3604
8/30/22	NORTH & SOUTH:	Valley View	LOCATION #:	7
TUESDAY	EAST & WEST:	Plaza	CONTROL:	SIGNAL

CLASS 3: 3-AXLE TRUCKS

NOTES:

AM / PM / MD / OTHER / OTHER — ▲ N, ◄ W, E ►, S ▼

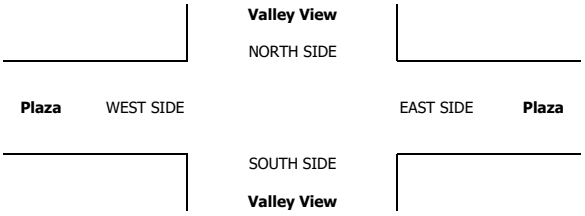
		NORTHBOUND Valley View			SOUTHBOUND Valley View			EASTBOUND Plaza			WESTBOUND Plaza			
	LANES:	NL 1	NT 3	NR 0	SL 1	ST 3	SR 0	EL 1	ET 1	ER 0	WL 1	WT 1	WR 0	TOTAL
AM	7:00 AM	0	1	0	0	1	0	0	0	0	0	0	0	2
	7:15 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	7:30 AM	0	1	0	0	0	0	0	0	0	0	0	0	1
	7:45 AM	0	0	0	0	2	1	0	0	0	0	0	0	3
	8:00 AM	0	0	0	0	6	0	0	1	0	0	0	0	7
	8:15 AM	0	0	0	0	2	0	0	0	0	0	0	0	2
	8:30 AM	0	1	0	0	4	0	0	0	0	0	0	0	5
	8:45 AM	0	0	0	0	0	0	0	0	0	0	0	1	1
	VOLUMES	0	3	0	0	15	1	0	1	0	0	0	1	21
	APPROACH %	0%	100%	0%	0%	94%	6%	0%	100%	0%	0%	0%	100%	
	APP/DEPART	3	/	4	16	/	15	1	/	1	1	/	1	0
	BEGIN PEAK HR		7:45 AM											
	VOLUMES	0	1	0	0	14	1	0	1	0	0	0	0	17
	APPROACH %	0%	100%	0%	0%	93%	7%	0%	100%	0%	0%	0%	0%	
	PEAK HR FACTOR		0.250			0.625			0.250			0.000		0.607
	APP/DEPART	1	/	1	15	/	14	1	/	1	0	/	1	0
PM	4:00 PM	0	1	0	0	1	0	0	0	0	0	0	0	2
	4:15 PM	0	5	0	0	1	0	0	0	0	0	0	0	6
	4:30 PM	0	1	0	0	2	0	0	0	0	0	0	0	3
	4:45 PM	0	1	0	0	2	0	0	0	0	0	0	0	3
	5:00 PM	0	3	0	0	0	0	0	0	0	0	0	0	3
	5:15 PM	0	1	0	0	0	0	0	0	0	0	0	0	1
	5:30 PM	0	1	0	0	0	0	0	0	0	0	0	0	1
	5:45 PM	0	0	0	0	1	0	0	0	0	0	0	0	1
	VOLUMES	0	13	0	0	7	0	0	0	0	0	0	0	20
	APPROACH %	0%	100%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	
	APP/DEPART	13	/	13	7	/	7	0	/	0	0	/	0	0
	BEGIN PEAK HR		4:30 PM											
	VOLUMES	0	6	0	0	4	0	0	0	0	0	0	0	10
	APPROACH %	0%	100%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	
	PEAK HR FACTOR		0.500			0.500			0.000			0.000		0.833
	APP/DEPART	6	/	6	4	/	4	0	/	0	0	/	0	0

U-TURNS

NB	SB	EB	WB	TTL
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0

RTOR

NRR	SRR	ERR	WRR
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	1
0	0	0	1
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0



INTERSECTION TURNING MOVEMENT COUNTS

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE:	LOCATION:	Cypress	PROJECT #:	SC3604
8/30/22	NORTH & SOUTH:	Valley View	LOCATION #:	7
TUESDAY	EAST & WEST:	Plaza	CONTROL:	SIGNAL

CLASS 4: 4 OR MORE AXLE TRUCKS

NOTES:

AM / PM / MD / OTHER / OTHER — ▲ N, ◄ W, E ►, S ▼

		NORTHBOUND Valley View			SOUTHBOUND Valley View			EASTBOUND Plaza			WESTBOUND Plaza			
		NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
	LANES:	1	3	0	1	3	0	1	1	0	1	1	0	
AM	7:00 AM	0	1	0	0	1	0	1	0	0	0	0	0	3
	7:15 AM	0	1	0	0	2	0	0	0	0	0	0	0	3
	7:30 AM	0	0	0	0	3	0	0	0	0	0	0	0	3
	7:45 AM	0	2	0	0	1	0	0	0	0	0	0	0	3
	8:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0
	8:15 AM	0	2	0	0	2	0	0	0	0	0	0	0	4
	8:30 AM	0	4	0	0	6	0	0	0	0	0	0	0	10
	8:45 AM	0	2	0	0	2	0	0	0	0	0	0	0	4
	VOLUMES	0	12	0	0	17	0	1	0	0	0	0	0	30
	APPROACH %	0%	100%	0%	0%	100%	0%	100%	0%	0%	0%	0%	0%	
	APP/DEPART	12	/	13	17	/	17	1	/	0	0	/	0	0
	BEGIN PEAK HR		7:45 AM											
	VOLUMES	0	8	0	0	9	0	0	0	0	0	0	0	17
	APPROACH %	0%	100%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	
	PEAK HR FACTOR		0.500			0.375			0.000			0.000		0.425
	APP/DEPART	8	/	8	9	/	9	0	/	0	0	/	0	0
PM	4:00 PM	0	1	0	0	2	0	0	0	0	0	0	0	3
	4:15 PM	0	3	0	0	0	0	0	0	0	0	0	0	3
	4:30 PM	0	1	0	0	1	0	0	0	0	0	0	0	2
	4:45 PM	0	1	0	0	1	0	0	0	0	0	0	0	2
	5:00 PM	0	3	0	0	0	0	0	0	0	0	0	0	3
	5:15 PM	0	1	0	0	1	0	0	0	0	1	0	0	3
	5:30 PM	0	1	0	0	0	0	0	0	0	0	0	0	1
	5:45 PM	0	3	0	0	2	0	0	0	0	0	0	0	5
	VOLUMES	0	14	0	0	7	0	0	0	0	1	0	0	22
	APPROACH %	0%	100%	0%	0%	100%	0%	0%	0%	0%	100%	0%	0%	
	APP/DEPART	14	/	14	7	/	8	0	/	0	1	/	0	0
	BEGIN PEAK HR		4:30 PM											
	VOLUMES	0	6	0	0	3	0	0	0	0	1	0	0	10
	APPROACH %	0%	100%	0%	0%	100%	0%	0%	0%	0%	100%	0%	0%	
	PEAK HR FACTOR		0.500			0.750			0.000			0.250		0.833
	APP/DEPART	6	/	6	3	/	4	0	/	0	1	/	0	0

U-TURNS

NB	SB	EB	WB	TTL
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0

RTOR

NRR	SRR	ERR	WRR
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0

Valley View

NORTH SIDE

Plaza WEST SIDE EAST SIDE **Plaza**

SOUTH SIDE

Valley View

A816

24-HOUR ROADWAY SEGMENT COUNTS (WITH FHWA CLASSIFICATION)

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE: Tuesday, August 30, 2022
JOB #: SC3604

CITY: Cypress
LOCATION: CLASS2 Plaza east of McDonnell

AM	EASTBOUND														PM	EASTBOUND													
TIME	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL	Time	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL
0:00	0	17	3	1	0	0	0	0	0	0	0	0	0	21	12:00	5	315	43	3	13	1	0	0	2	0	0	0	0	382
0:15	0	17	0	0	0	0	0	0	1	0	0	0	0	18	12:15	2	280	38	0	18	1	0	0	3	0	0	0	0	342
0:30	1	27	4	0	0	0	0	0	1	0	0	0	0	33	12:30	0	296	33	1	9	0	0	0	5	0	0	0	0	344
0:45	0	18	1	0	0	0	0	0	0	0	0	0	0	19	12:45	0	291	51	0	10	4	0	0	4	0	0	0	0	360
1:00	0	7	2	1	0	0	0	0	0	0	0	0	0	10	13:00	0	301	29	1	9	2	0	0	2	0	0	0	0	344
1:15	0	15	3	0	0	0	0	0	1	0	0	0	0	19	13:15	0	289	37	1	11	1	0	1	2	0	0	0	0	342
1:30	0	21	3	0	1	0	0	0	0	0	0	0	0	25	13:30	1	278	46	2	13	0	0	0	2	0	0	0	0	342
1:45	0	8	2	0	0	0	0	0	0	0	0	0	0	10	13:45	1	263	32	1	6	3	0	2	0	0	0	0	0	308
2:00	0	11	1	0	0	0	0	0	0	0	0	0	0	12	14:00	0	310	50	0	12	3	0	1	3	0	0	0	0	379
2:15	0	19	0	0	0	0	0	0	0	0	0	0	0	19	14:15	2	303	46	1	14	3	0	0	2	0	0	0	0	371
2:30	0	7	3	0	0	0	0	0	0	0	0	0	0	10	14:30	0	342	64	1	14	1	0	0	1	0	0	0	0	423
2:45	0	17	3	0	0	0	0	0	1	0	0	0	0	21	14:45	0	332	46	1	12	5	0	1	3	0	0	0	0	400
3:00	0	20	5	0	0	0	0	0	1	0	0	0	0	26	15:00	2	315	62	0	15	6	0	1	1	0	0	0	0	402
3:15	2	21	2	0	0	0	0	0	0	0	0	0	0	25	15:15	1	337	69	2	9	5	0	1	2	0	0	0	0	426
3:30	0	14	2	0	0	0	0	0	0	0	0	0	0	16	15:30	2	399	54	3	11	1	0	0	1	0	0	0	0	471
3:45	0	27	7	0	0	0	0	0	0	0	0	0	0	34	15:45	2	392	68	3	16	2	0	0	3	0	0	0	0	486
4:00	1	20	6	0	0	0	0	0	0	0	0	0	0	27	16:00	3	382	53	0	10	4	0	0	1	0	0	0	0	453
4:15	0	42	6	1	1	0	0	0	1	0	0	0	0	51	16:15	2	415	54	2	8	3	0	0	0	0	0	0	0	484
4:30	0	54	8	0	0	1	0	0	2	0	0	0	0	65	16:30	2	391	53	1	7	1	0	0	0	0	0	0	0	455
4:45	1	72	9	1	3	0	0	0	1	0	0	0	0	87	16:45	1	381	47	1	6	3	0	2	0	0	0	0	0	441
5:00	1	42	8	1	1	0	0	0	2	0	0	0	0	55	17:00	1	484	45	0	6	1	0	0	0	0	0	0	0	537
5:15	0	78	11	1	1	2	0	0	3	2	0	0	0	98	17:15	5	429	49	1	8	1	0	0	0	0	0	0	0	493
5:30	2	103	17	1	3	1	0	0	2	0	0	0	0	129	17:30	4	413	41	1	1	2	0	0	0	0	0	0	0	462
5:45	0	164	29	0	5	0	0	0	6	0	0	0	0	204	17:45	0	382	51	0	4	0	0	0	2	0	0	0	0	439
6:00	1	125	35	1	3	0	0	0	3	0	0	0	0	168	18:00	0	370	52	1	5	0	0	0	0	0	0	0	0	428
6:15	0	147	23	1	5	0	0	0	2	0	0	0	0	178	18:15	5	366	48	0	1	1	0	0	4	0	0	0	0	425
6:30	1	188	46	1	3	2	0	0	1	0	0	0	0	242	18:30	1	284	27	1	5	1	0	0	1	0	0	0	0	320
6:45	0	239	49	0	4	2	0	1	3	1	0	0	0	299	18:45	0	310	32	0	10	0	0	0	0	0	0	0	0	352
7:00	1	263	41	1	9	0	0	0	3	0	0	0	0	318	19:00	0	264	33	1	4	0	0	0	0	0	0	0	0	302
7:15	1	282	46	1	6	2	0	0	1	1	0	0	0	340	19:15	1	265	32	0	3	0	0	0	2	0	0	0	0	303
7:30	3	341	39	2	7	2	0	0	1	1	0	0	0	396	19:30	1	263	25	1	7	0	0	0	0	0	0	0	0	297
7:45	1	385	38	1	9	1	0	0	3	0	0	0	0	438	19:45	0	240	19	0	0	0	0	0	1	0	0	0	0	260
8:00	2	393	46	0	11	2	0	0	2	0	0	0	0	456	20:00	1	246	18	1	2	0	0	0	0	0	0	0	0	268
8:15	1	355	43	1	10	0	0	1	2	0	0	0	0	413	20:15	0	207	15	0	1	0	0	0	1	0	0	0	0	224
8:30	1	306	37	1	9	0	0	0	6	1	0	0	0	361	20:30	0	165	10	0	2	0	0	0	1	0	0	0	0	178
8:45	1	269	49	1	12	6	1	1	4	0	0	0	0	344	20:45	1	158	9	0	2	0	0	0	0	0	0	0	0	170
9:00	1	239	30	0	11	2	4	0	4	0	0	0	0	291	21:00	1	134	8	1	0	1	0	0	0	0	0	0	0	145
9:15	0	240	28	1	6	2	0	1	0	0	0	0	0	278	21:15	0	136	10	0	0	1	0	0	0	0	0	0	0	147
9:30	1	225	26	0	8	1	1	1	4	1	0	0	0	268	21:30	1	121	4	0	1	0	0	0	0	0	0	0	0	127
9:45	3	226	40	1	6	4	2	3	0	0	0	0	0	285	21:45	0	75	6	0	1	0	0	0	1	0	0	0	0	83
10:00	0	215	38	1	10	2	0	1	1	0	0	0	0	268	22:00	0	72	1	1	2	0	0	0	0	0	0	0	0	76
10:15	0	215	44	0	8	2	0	0	3	0	0	0	0	272	22:15	1	70	4	0	0	0	0	0	0	0	0	0	0	75
10:30	0	214	41	0	12	2	0	0	1	0	0	0	0	270	22:30	0	68	6	0	0	0	0	0	1	0	0	0	0	75
10:45	0	243	45	1	10	0	2	0	1	1	0	0	0	303	22:45	1	53	7	1	0	0	0	0	0	0	0	0	0	62
11:00	2	277	43	1	6	3	0	1	2	0	0	0	0	335	23:00	0	55	3	2	0	0	0	0	0	0	0	0	0	60
11:15	1	254	45	0	4	4	1	0	3	0	0	0	0	312	23:15	0	38	6	0	0	0	0	0	0	0	0	0	0	44
11:30	0	280	51	1	9	4	0	0	4	0	0	0	0	349	23:30	1	53	1	0	2	0	0	0	1	0	0	0	0	58
11:45	0	229	47	0	7	2	1	0	3	1	0	0	0	290	23:45	0	31	5	0	1	0	0	0	0	0	0	0	0	37
TOTAL	29	6,991	1,105	24	200	49	12	10	79	9	0	0	0	8,508	TOTAL	51	12,364	1,542	36	291	57	0	9	52	0	0	0	0	14,402

AM PEAK HOUR	7:30 AM
AM PEAK VOLUME	1,703

PM PEAK HOUR	4:45 PM
PM PEAK VOLUME	1,933

CLASS 1	Class 1 — Motorcycles	**CLASS 8**	3 to 4 Axles, Single Trailer
CLASS 2	Passenger Cars	**CLASS 9**	5 Axles, Single Trailer
CLASS 3	2 Axles, 4-Tire Single Units	**CLASS 10**	6 or More Axles, Single Trailer
CLASS 4	Buses	**CLASS 11**	5 or Less Axles, Multi-Trailers
CLASS 5	2 Axles, 6-Tire Single Units	**CLASS 12**	6 Axles, Multi-Trailers
CLASS 6	3 Axles, Single Unit	**CLASS 13**	7 or More Axles, Multi-Trailers
CLASS 7	4 or More Axles, Single Unit		

TOTAL: AM+PM	80	19,355	2,647	60	491	106	12	19	131	9	0	0	0	22,910
% OF TOTAL	0.3%	84.5%	11.6%	0.3%	2.1%	0.5%	0.1%	0.1%	0.6%	0.0%	0.0%	0.0%	0.0%	100.0%
Class	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**	**11**	**12**	**13**	
TOTAL: ALL	142	36,433	4,785	118	949	197	19	40	267	22	0	0	0	42,972
% OF TOTAL	0.6%	159.0%	20.9%	0.5%	4.1%	0.9%	0.1%	0.2%	1.2%	0.1%	0.0%	0.0%	0.0%	100.0%

24-HOUR ROADWAY SEGMENT COUNTS (WITH FHWA CLASSIFICATION)

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE: Tuesday, August 30, 2022
JOB #: SC3604

CITY: Cypress
LOCATION: CLASS2 Plaza east of McDonnell

AM	WESTBOUND													
TIME	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL
0:00	0	25	2	1	0	0	0	0	0	0	0	0	0	28
0:15	0	24	1	0	1	0	0	0	0	0	0	0	0	26
0:30	0	22	3	0	0	0	0	0	0	0	0	0	0	25
0:45	0	16	0	0	0	0	0	0	0	0	0	0	0	16
1:00	0	22	0	1	0	0	0	0	0	0	0	0	0	23
1:15	0	11	4	0	2	0	0	0	0	0	0	0	0	17
1:30	1	6	1	0	0	0	0	0	1	0	0	0	0	9
1:45	0	16	0	0	2	0	0	0	0	0	0	0	0	18
2:00	0	18	2	0	0	0	0	0	0	0	0	0	0	20
2:15	0	9	2	0	0	0	0	0	1	0	0	0	0	12
2:30	0	5	1	0	0	0	0	0	2	0	0	0	0	8
2:45	0	13	2	0	0	0	0	0	1	0	0	0	0	16
3:00	0	10	1	0	0	0	0	0	1	0	0	0	0	12
3:15	0	21	2	0	1	0	0	0	0	0	0	0	0	24
3:30	0	28	3	0	1	0	0	0	0	0	0	0	0	32
3:45	0	38	3	0	1	0	0	0	0	0	0	0	0	42
4:00	0	16	1	0	0	1	0	0	1	0	0	0	0	19
4:15	0	32	6	0	3	0	0	0	0	0	0	0	0	41
4:30	0	45	4	1	1	2	0	0	1	0	0	0	0	54
4:45	0	59	8	1	2	1	0	0	0	0	0	0	0	71
5:00	0	63	13	1	2	1	0	0	5	0	0	0	0	85
5:15	0	64	11	0	2	4	0	0	4	1	0	0	0	86
5:30	1	85	12	1	2	4	0	0	1	0	0	0	0	106
5:45	0	107	24	0	7	0	0	0	1	0	0	0	0	139
6:00	1	97	23	1	3	0	0	1	1	0	0	0	0	127
6:15	1	123	38	1	2	2	0	0	3	0	0	0	0	170
6:30	0	173	49	2	10	1	0	0	0	1	0	0	0	236
6:45	1	210	44	1	8	0	0	0	5	0	0	0	0	269
7:00	0	236	35	2	6	4	0	1	3	0	0	0	0	287
7:15	1	340	49	1	7	4	0	0	2	0	0	0	0	404
7:30	2	347	50	0	20	0	1	0	1	1	0	0	0	422
7:45	1	374	46	1	11	4	0	1	2	0	0	0	0	440
8:00	1	336	47	1	7	4	0	1	5	2	0	0	0	404
8:15	1	351	46	1	8	2	0	0	3	0	0	0	0	412
8:30	3	328	37	0	10	3	2	0	6	0	0	0	0	389
8:45	2	283	34	1	11	3	0	1	4	1	0	0	0	340
9:00	1	253	29	1	13	1	0	1	1	0	0	0	0	300
9:15	3	198	30	1	6	0	0	0	4	1	0	0	0	243
9:30	0	226	31	1	7	0	0	0	3	0	0	0	0	268
9:45	0	216	32	0	12	1	0	0	2	0	0	0	0	263
10:00	0	213	28	1	8	2	0	0	7	0	0	0	0	259
10:15	1	240	33	0	15	1	0	1	1	0	0	0	0	292
10:30	0	227	26	1	8	0	2	1	1	1	0	0	0	267
10:45	1	235	32	0	12	1	2	2	1	0	0	0	0	286
11:00	0	199	35	1	9	1	0	0	3	0	0	0	0	248
11:15	0	242	48	0	25	0	0	0	3	1	0	0	0	319
11:30	0	255	35	0	8	1	0	0	2	0	0	0	0	301
11:45	1	256	49	1	9	0	0	1	4	0	0	0	0	321
TOTAL	23	6,713	1,012	25	262	48	7	11	86	9	0	0	0	8,196

AM PEAK HOUR	7:30 AM
AM PEAK VOLUME	1,678

PM	WESTBOUND													
Time	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL
12:00	0	241	43	0	9	0	0	0	1	0	0	0	0	294
12:15	0	284	36	2	4	1	0	0	2	0	0	0	0	329
12:30	4	272	31	0	6	4	0	0	4	0	0	0	0	321
12:45	1	288	27	1	7	3	0	1	3	1	0	0	0	332
13:00	1	255	42	0	18	0	0	1	0	0	0	0	0	317
13:15	2	247	32	2	11	1	0	0	4	0	0	0	0	299
13:30	1	296	35	1	12	2	0	0	1	1	0	0	0	349
13:45	3	267	37	2	9	3	0	0	4	0	0	0	0	325
14:00	3	235	32	1	18	1	0	0	3	0	0	0	0	293
14:15	0	264	32	0	11	2	0	0	2	0	0	0	0	311
14:30	1	313	39	1	3	3	0	2	1	1	0	0	0	364
14:45	2	333	45	2	8	1	0	1	1	0	0	0	0	393
15:00	1	293	37	1	0	2	0	0	1	0	0	0	0	335
15:15	0	267	36	2	9	1	0	3	0	1	0	0	0	319
15:30	0	288	37	1	10	5	0	1	1	0	0	0	0	343
15:45	0	290	38	2	10	2	0	0	0	0	0	0	0	342
16:00	2	312	38	1	6	3	0	0	3	0	0	0	0	365
16:15	2	291	26	1	3	2	0	0	1	0	0	0	0	326
16:30	1	354	44	0	5	3	0	0	2	0	0	0	0	409
16:45	3	361	35	1	3	2	0	0	1	0	0	0	0	406
17:00	2	431	45	0	6	0	0	0	0	0	0	0	0	484
17:15	0	351	29	1	5	0	0	0	0	0	0	0	0	386
17:30	1	351	41	0	3	0	0	0	1	0	0	0	0	397
17:45	0	324	25	1	2	0	0	0	0	0	0	0	0	352
18:00	0	322	32	1	2	0	0	0	1	0	0	0	0	358
18:15	0	248	21	1	0	0	0	0	0	0	0	0	0	270
18:30	0	283	14	0	1	0	0	0	0	0	0	0	0	298
18:45	0	216	15	1	2	0	0	0	1	0	0	0	0	235
19:00	1	226	14	0	3	1	0	1	1	0	0	0	0	247
19:15	0	210	22	0	0	0	0	0	1	0	0	0	0	233
19:30	0	206	16	1	3	0	0	0	1	0	0	0	0	227
19:45	0	197	15	1	1	0	0	0	2	0	0	0	0	216
20:00	2	169	16	1	0	0	0	0	0	0	0	0	0	188
20:15	1	126	14	0	0	1	0	0	1	0	0	0	0	143
20:30	1	125	10	1	2	0	0	0	1	0	0	0	0	140
20:45	0	107	8	0	0	0	0	0	0	0	0	0	0	115
21:00	0	118	9	1	0	0	0	0	1	0	0	0	0	129
21:15	0	101	9	0	0	0	0	0	0	0	0	0	0	110
21:30	0	72	11	0	0	0	0	0	0	0	0	0	0	83
21:45	1	67	3	0	1	0	0	0	1	0	0	0	0	73
22:00	1	51	8	1	0	0	0	0	2	0	0	0	0	63
22:15	0	54	6	0	0	0	0	0	0	0	0	0	0	60
22:30	0	57	6	0	0	0	0	0	1	0	0	0	0	64
22:45	1	47	5	0	1	0	0	0	0	0	0	0	0	54
23:00	0	38	1	1	2	0	0	0	0	0	0	0	0	42
23:15	0	41	1	0	0	0	0	0	0	0	0	0	0	42
23:30	1	47	4	0	0	0	0	0	0	0	0	0	0	52
23:45	0	29	4	0	0	0	0	0	0	0	0	0	0	33
TOTAL	39	####	1,126	33	196	43	0	10	50	4	0	0	0	11,866

PM PEAK HOUR	4:30 PM
PM PEAK VOLUME	1,685

CLASS 1	Class 1 — Motorcycles	**CLASS 8**	3 to 4 Axles, Single Trailer
CLASS 2	Passenger Cars	**CLASS 9**	5 Axles, Single Trailer
CLASS 3	2 Axles, 4-Tire Single Units	**CLASS 10**	6 or More Axles, Single Trailer
CLASS 4	Buses	**CLASS 11**	5 or Less Axles, Multi-Trailers
CLASS 5	2 Axles, 6-Tire Single Units	**CLASS 12**	6 Axles, Multi-Trailers
CLASS 6	3 Axles, Single Unit	**CLASS 13**	7 or More Axles, Multi-Trailers
CLASS 7	4 or More Axles, Single Unit		

TOTAL: AM+PM	62	####	2,138	58	458	91	7	21	136	13	0	0	0	20,062
% OF TOTAL	0.3%	85.1%	10.7%	0.3%	2.3%	0.5%	0.0%	0.1%	0.7%	0.1%	0.0%	0.0%	0.0%	100.0%

Class	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**	**11**	**12**	**13**

A816

24-HOUR ROADWAY SEGMENT COUNTS (WITH FHWA CLASSIFICATION)

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE: Tuesday, August 30, 2022
JOB #: SC3604

CITY: Cypress
LOCATION: CLASS3 Valley View north of Plaza

AM	EASTBOUND													
TIME	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL
0:00	0	2	0	0	0	0	0	0	0	0	0	0	0	2
0:15	0	0	1	0	0	0	0	0	0	0	0	0	0	1
0:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:30	0	1	1	0	0	0	0	0	0	0	0	0	0	2
1:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:30	0	0	0	0	0	0	0	0	1	0	0	0	0	1
4:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5:00	0	3	0	0	0	0	0	0	0	0	0	0	0	3
5:15	0	3	1	0	0	0	0	0	0	0	0	0	0	4
5:30	0	1	0	0	0	0	0	0	0	0	0	0	0	1
5:45	0	0	1	0	1	0	0	0	0	0	0	0	0	2
6:00	0	1	0	0	0	0	0	0	0	0	0	0	0	1
6:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6:30	0	3	1	0	0	0	0	0	0	0	0	0	0	4
6:45	0	4	0	0	0	0	0	0	0	0	0	0	0	4
7:00	0	4	1	0	0	0	0	0	1	0	0	0	0	6
7:15	0	2	0	0	0	0	0	0	0	0	0	0	0	2
7:30	0	3	0	0	0	0	0	0	0	0	0	0	0	3
7:45	0	10	0	0	0	0	0	0	0	0	0	0	0	10
8:00	0	6	1	0	0	0	0	0	0	0	0	0	0	7
8:15	0	8	0	0	0	0	0	0	1	0	0	0	0	9
8:30	0	7	2	0	0	0	0	0	0	0	0	0	0	9
8:45	0	6	2	0	0	0	0	0	0	0	0	0	0	8
9:00	0	6	1	0	0	0	0	0	1	0	0	0	0	8
9:15	0	4	0	0	0	0	0	0	0	0	0	0	0	4
9:30	0	4	1	0	0	0	0	0	0	0	0	0	0	5
9:45	0	2	0	0	0	0	0	0	0	0	0	0	0	2
10:00	0	2	0	0	0	0	0	0	0	0	0	0	0	2
10:15	0	2	0	0	0	0	0	0	1	0	0	0	0	3
10:30	0	4	1	0	0	0	0	0	0	0	0	0	0	5
10:45	0	5	0	0	1	0	0	0	0	0	0	0	0	6
11:00	0	7	0	0	1	0	0	0	0	0	0	0	0	8
11:15	0	7	0	0	0	0	0	0	0	0	0	0	0	7
11:30	0	7	1	0	0	0	0	0	0	0	0	0	0	8
11:45	0	7	1	0	0	0	0	0	0	0	0	0	0	8
TOTAL	0	121	16	0	3	0	0	0	5	0	0	0	0	145

AM PEAK HOUR	7:45 AM
AM PEAK VOLUME	35

PM	EASTBOUND													
Time	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL
12:00	0	11	1	0	0	0	0	0	0	0	0	0	0	12
12:15	0	19	2	0	1	0	0	0	1	0	0	0	0	23
12:30	0	8	1	0	0	0	0	1	0	0	0	0	0	10
12:45	0	5	1	0	0	0	0	0	0	0	0	0	0	6
13:00	0	7	0	0	1	0	0	0	0	0	0	0	0	8
13:15	0	6	1	0	1	0	0	0	1	0	0	0	0	9
13:30	0	7	1	0	0	0	0	0	1	0	0	0	0	9
13:45	0	3	0	0	0	0	0	0	1	0	0	0	0	4
14:00	0	3	1	0	0	0	0	0	0	0	0	0	0	4
14:15	0	4	0	0	0	0	0	0	0	0	0	0	0	4
14:30	0	6	1	0	0	0	0	0	0	0	0	0	0	7
14:45	0	2	3	0	0	0	0	0	1	0	0	0	0	6
15:00	0	8	1	0	0	0	0	0	1	0	0	0	0	10
15:15	0	7	1	0	0	0	0	0	2	0	0	0	0	10
15:30	0	7	0	0	0	0	0	0	1	0	0	0	0	8
15:45	0	9	0	0	0	0	0	0	0	0	0	0	0	9
16:00	0	10	0	0	0	0	0	0	0	0	0	0	0	10
16:15	0	7	2	0	0	0	0	0	0	0	0	0	0	9
16:30	0	13	1	0	0	0	0	0	0	0	0	0	0	14
16:45	0	4	0	0	0	0	0	0	0	0	0	0	0	4
17:00	0	17	4	0	0	0	0	0	0	0	0	0	0	21
17:15	0	10	1	0	0	0	0	0	0	0	0	0	0	11
17:30	0	12	0	0	0	0	0	0	0	0	0	0	0	12
17:45	0	8	0	0	0	0	0	0	0	0	0	0	0	8
18:00	0	7	1	0	0	0	0	0	0	0	0	0	0	8
18:15	0	7	1	0	0	0	0	0	0	0	0	0	0	8
18:30	0	5	1	0	0	0	0	0	0	0	0	0	0	6
18:45	0	6	0	0	0	0	0	0	0	0	0	0	0	6
19:00	0	3	2	0	0	0	0	0	0	0	0	0	0	5
19:15	0	3	0	0	0	0	0	0	0	0	0	0	0	3
19:30	0	1	0	0	0	0	0	0	0	0	0	0	0	1
19:45	0	1	0	0	0	0	0	0	0	0	0	0	0	1
20:00	0	2	1	0	0	0	0	0	0	0	0	0	0	3
20:15	0	1	1	0	0	1	0	0	0	0	0	0	0	3
20:30	0	2	0	0	0	0	0	0	0	0	0	0	0	2
20:45	0	6	0	0	0	0	0	0	0	0	0	0	0	6
21:00	0	2	0	0	0	0	0	0	0	0	0	0	0	2
21:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0
21:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0
21:45	0	3	1	0	0	0	0	0	0	0	0	0	0	4
22:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22:30	0	1	1	0	0	1	0	0	0	0	0	0	0	3
22:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23:00	0	1	0	0	0	0	0	0	0	0	0	0	0	1
23:15	0	1	0	0	0	0	0	0	0	0	0	0	0	1
23:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	0	245	31	0	3	2	0	1	9	0	0	0	0	291

PM PEAK HOUR	5:00 PM
PM PEAK VOLUME	52

CLASS 1	Class 1 — Motorcycles	**CLASS 8**	3 to 4 Axles, Single Trailer
CLASS 2	Passenger Cars	**CLASS 9**	5 Axles, Single Trailer
CLASS 3	2 Axles, 4-Tire Single Units	**CLASS 10**	6 or More Axles, Single Trailer
CLASS 4	Buses	**CLASS 11**	5 or Less Axles, Multi-Trailers
CLASS 5	2 Axles, 6-Tire Single Units	**CLASS 12**	6 Axles, Multi-Trailers
CLASS 6	3 Axles, Single Unit	**CLASS 13**	7 or More Axles, Multi-Trailers
CLASS 7	4 or More Axles, Single Unit		

TOTAL: AM+PM	0	366	47	0	6	2	0	1	14	0	0	0	0	436
% OF TOTAL	0.0%	83.9%	10.8%	0.0%	1.4%	0.5%	0.0%	0.2%	3.2%	0.0%	0.0%	0.0%	0.0%	100.0%
Class	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**	**11**	**12**	**13**	
TOTAL: ALL	0	673	78	0	17	5	0	3	26	0	0	0	0	802
% OF TOTAL	0.0%	154.4%	17.9%	0.0%	3.9%	1.1%	0.0%	0.7%	6.0%	0.0%	0.0%	0.0%	0.0%	100.0%

24-HOUR ROADWAY SEGMENT COUNTS (WITH FHWA CLASSIFICATION)

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE: Tuesday, August 30, 2022
JOB #: SC3604

CITY: Cypress
LOCATION: CLASS3 Valley View north of Plaza

AM	WESTBOUND													
TIME	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL
0:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0:15	0	0	1	0	0	0	0	0	0	0	0	0	0	1
0:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0:45	0	2	0	0	0	0	0	0	0	0	0	0	0	2
1:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:00	0	0	1	0	0	0	0	0	0	0	0	0	0	1
3:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4:15	0	0	0	0	0	0	0	0	1	0	0	0	0	1
4:30	0	0	0	0	0	0	0	0	1	0	0	0	0	1
4:45	0	3	0	0	0	0	0	0	0	0	0	0	0	3
5:00	0	1	0	0	0	0	0	0	0	0	0	0	0	1
5:15	0	2	0	0	0	0	0	0	0	0	0	0	0	2
5:30	0	4	0	0	0	0	0	0	0	0	0	0	0	4
5:45	0	2	0	0	0	0	0	0	0	0	0	0	0	2
6:00	0	3	0	0	0	0	0	0	0	0	0	0	0	3
6:15	0	2	0	0	0	0	0	0	1	0	0	0	0	3
6:30	0	1	0	0	0	1	0	0	1	0	0	0	0	3
6:45	0	4	1	0	0	0	0	0	0	0	0	0	0	5
7:00	0	9	1	0	0	0	0	0	0	0	0	0	0	10
7:15	0	6	2	0	0	0	0	0	0	0	0	0	0	8
7:30	0	6	0	0	0	0	0	0	0	0	0	0	0	6
7:45	0	12	0	0	0	0	0	0	0	0	0	0	0	12
8:00	0	16	0	0	0	0	0	0	0	0	0	0	0	16
8:15	0	13	2	0	0	0	0	1	0	0	0	0	0	16
8:30	0	9	0	0	0	0	0	0	0	0	0	0	0	9
8:45	0	8	0	0	0	0	0	0	0	0	0	0	0	8
9:00	0	8	0	0	1	0	0	0	0	0	0	0	0	9
9:15	0	4	1	0	0	0	0	0	0	0	0	0	0	5
9:30	0	6	0	0	0	0	0	0	0	0	0	0	0	6
9:45	0	2	1	0	0	0	0	0	0	0	0	0	0	3
10:00	0	7	1	0	1	0	0	0	0	0	0	0	0	9
10:15	0	3	2	0	2	0	0	0	0	0	0	0	0	7
10:30	0	4	0	0	1	0	0	0	1	0	0	0	0	6
10:45	0	2	0	0	0	0	0	0	1	0	0	0	0	3
11:00	0	4	0	0	0	0	0	0	0	0	0	0	0	4
11:15	0	3	0	0	0	0	0	0	1	0	0	0	0	4
11:30	0	5	0	0	0	0	0	0	0	0	0	0	0	5
11:45	0	1	0	0	1	0	0	0	0	0	0	0	0	2
TOTAL	0	152	13	0	6	1	0	1	7	0	0	0	0	180

AM PEAK HOUR	7:45 AM
AM PEAK VOLUME	53

PM	WESTBOUND													
Time	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL
12:00	0	5	0	0	1	0	0	1	0	0	0	0	0	7
12:15	0	7	2	0	0	0	0	0	1	0	0	0	0	10
12:30	0	6	2	0	1	0	0	0	0	0	0	0	0	9
12:45	0	9	1	0	1	0	0	0	2	0	0	0	0	13
13:00	0	11	1	0	0	0	0	0	0	0	0	0	0	12
13:15	0	8	0	0	0	0	0	0	0	0	0	0	0	8
13:30	0	4	0	0	0	0	0	0	1	0	0	0	0	5
13:45	0	5	0	0	0	0	0	0	0	0	0	0	0	5
14:00	0	3	0	0	0	0	0	0	0	0	0	0	0	3
14:15	0	1	1	0	0	0	0	0	1	0	0	0	0	3
14:30	0	4	0	0	0	0	0	0	0	0	0	0	0	4
14:45	0	7	0	0	0	0	0	0	0	0	0	0	0	7
15:00	0	3	1	0	0	2	0	0	0	0	0	0	0	6
15:15	0	2	3	0	0	0	0	0	0	0	0	0	0	5
15:30	0	3	0	0	1	0	0	0	0	0	0	0	0	4
15:45	0	4	0	0	0	0	0	0	0	0	0	0	0	4
16:00	0	4	2	0	0	0	0	0	0	0	0	0	0	6
16:15	0	2	0	0	0	0	0	0	0	0	0	0	0	2
16:30	0	2	0	0	0	0	0	0	0	0	0	0	0	2
16:45	0	4	1	0	1	0	0	0	0	0	0	0	0	6
17:00	0	8	0	0	0	0	0	0	0	0	0	0	0	8
17:15	0	7	0	0	0	0	0	0	0	0	0	0	0	7
17:30	0	8	0	0	0	0	0	0	0	0	0	0	0	8
17:45	0	2	0	0	0	0	0	0	0	0	0	0	0	2
18:00	0	5	0	0	0	0	0	0	0	0	0	0	0	5
18:15	0	3	0	0	0	0	0	0	0	0	0	0	0	3
18:30	0	4	0	0	0	0	0	0	0	0	0	0	0	4
18:45	0	3	0	0	0	0	0	0	0	0	0	0	0	3
19:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19:15	0	5	0	0	0	0	0	0	0	0	0	0	0	5
19:30	0	5	1	0	0	0	0	0	0	0	0	0	0	6
19:45	0	2	0	0	0	0	0	0	0	0	0	0	0	2
20:00	0	0	1	0	0	0	0	0	0	0	0	0	0	1
20:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0
20:30	0	0	1	0	0	0	0	0	0	0	0	0	0	1
20:45	0	1	0	0	0	0	0	0	0	0	0	0	0	1
21:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0
21:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0
21:30	0	1	0	0	0	0	0	0	0	0	0	0	0	1
21:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22:00	0	2	0	0	0	0	0	0	0	0	0	0	0	2
22:15	0	0	1	0	0	0	0	0	0	0	0	0	0	1
22:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22:45	0	1	0	0	0	0	0	0	0	0	0	0	0	1
23:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23:15	0	1	0	0	0	0	0	0	0	0	0	0	0	1
23:30	0	2	0	0	0	0	0	0	0	0	0	0	0	2
23:45	0	1	0	0	0	0	0	0	0	0	0	0	0	1
TOTAL	0	155	18	0	5	2	0	1	5	0	0	0	0	186

PM PEAK HOUR	12:15 PM
PM PEAK VOLUME	44

CLASS 1	Class 1 — Motorcycles	**CLASS 8**	3 to 4 Axles, Single Trailer
CLASS 2	Passenger Cars	**CLASS 9**	5 Axles, Single Trailer
CLASS 3	2 Axles, 4-Tire Single Units	**CLASS 10**	6 or More Axles, Single Trailer
CLASS 4	Buses	**CLASS 11**	5 or Less Axles, Multi-Trailers
CLASS 5	2 Axles, 6-Tire Single Units	**CLASS 12**	6 Axles, Multi-Trailers
CLASS 6	3 Axles, Single Unit	**CLASS 13**	7 or More Axles, Multi-Trailers
CLASS 7	4 or More Axles, Single Unit		

TOTAL: AM+PM	0	307	31	0	11	3	0	2	12	0	0	0	0	366
% OF TOTAL	0.0%	83.9%	8.5%	0.0%	3.0%	0.8%	0.0%	0.5%	3.3%	0.0%	0.0%	0.0%	0.0%	100.0%

Class	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**	**11**	**12**	**13**

A816

24-HOUR ROADWAY SEGMENT COUNTS (WITH FHWA CLASSIFICATION)

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE: Tuesday, August 30, 2022
JOB #: SC3604

CITY: Cypress
LOCATION: TMC1 Douglas and Katella

AM	NORTHBOUND													
TIME	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL
0:00	1	31	2	0	0	0	0	0	0	0	0	0	0	34
0:15	1	18	4	0	0	0	0	0	1	0	0	0	0	24
0:30	0	29	1	0	0	0	0	0	2	0	0	0	0	32
0:45	0	19	1	0	0	0	0	0	0	0	0	0	0	20
1:00	0	29	3	0	0	0	0	0	1	0	0	0	0	33
1:15	0	16	1	0	0	0	0	0	1	0	0	0	0	18
1:30	0	17	2	0	0	0	0	0	0	0	0	0	0	19
1:45	0	4	1	0	1	0	0	0	1	0	0	0	0	7
2:00	0	13	1	0	0	0	0	0	0	0	0	0	0	14
2:15	0	13	0	0	0	0	0	0	2	0	0	0	0	15
2:30	0	8	0	0	0	0	0	0	0	0	0	0	0	8
2:45	0	9	0	0	0	0	0	0	1	0	0	0	0	10
3:00	0	13	1	0	0	0	0	0	1	0	0	0	0	15
3:15	0	5	1	0	0	0	0	0	0	0	0	0	0	6
3:30	0	15	2	0	0	0	0	0	0	0	0	0	0	17
3:45	0	11	1	0	0	0	0	0	0	0	0	0	0	12
4:00	0	14	2	0	0	0	0	0	1	0	0	0	0	17
4:15	0	31	1	1	2	0	0	0	0	0	0	0	0	35
4:30	0	26	3	0	0	0	0	0	1	0	0	0	0	30
4:45	0	45	6	0	1	0	0	0	1	0	0	0	0	53
5:00	0	35	7	0	2	0	0	0	1	0	0	0	0	45
5:15	0	44	10	0	1	1	0	1	2	0	0	0	0	59
5:30	0	66	10	0	1	0	0	1	1	0	0	0	0	79
5:45	0	80	13	1	2	0	0	0	2	0	0	0	0	98
6:00	0	78	15	0	3	0	0	0	0	0	0	0	0	96
6:15	1	95	14	0	3	2	0	0	2	0	0	0	0	117
6:30	0	125	26	1	6	1	0	1	3	0	0	0	0	163
6:45	1	177	12	1	4	1	0	0	1	0	0	0	0	197
7:00	0	211	22	0	1	3	0	1	1	0	0	0	0	239
7:15	1	260	37	0	5	0	0	0	1	0	0	0	0	304
7:30	0	313	29	2	5	0	0	0	0	0	0	0	0	349
7:45	0	325	27	2	7	0	0	0	2	0	0	0	0	363
8:00	1	326	45	0	7	0	0	0	0	0	0	0	0	379
8:15	0	299	40	1	4	0	0	0	2	0	0	0	0	346
8:30	0	302	45	0	8	1	0	0	4	0	0	0	0	360
8:45	0	250	40	1	6	1	0	0	2	0	0	0	0	300
9:00	1	212	35	0	12	2	0	0	1	0	0	0	0	263
9:15	0	194	26	0	5	1	0	1	3	0	0	0	0	230
9:30	0	178	30	1	9	0	0	1	1	0	0	0	0	220
9:45	0	207	42	1	10	1	0	1	2	0	0	0	0	264
10:00	1	178	27	0	13	0	0	1	2	0	0	0	0	222
10:15	1	185	31	0	13	0	0	0	3	0	0	0	0	233
10:30	0	200	48	0	12	0	0	0	2	0	0	0	0	262
10:45	0	226	33	1	15	0	0	0	2	0	0	0	0	277
11:00	1	190	48	1	18	0	0	1	1	0	0	0	0	260
11:15	0	228	46	1	9	1	0	0	5	0	0	0	0	290
11:30	1	237	35	0	10	1	0	0	5	0	0	0	0	289
11:45	1	253	38	1	15	3	0	1	1	0	0	0	0	313
TOTAL	12	5,840	864	16	210	19	0	10	65	0	0	0	0	7,036

AM PEAK HOUR	7:45 AM
AM PEAK VOLUME	1,448

PM	NORTHBOUND													
Time	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL
12:00	2	314	46	3	10	0	0	0	1	0	0	0	0	376
12:15	3	313	30	0	11	0	0	0	3	0	0	0	0	360
12:30	0	280	45	1	12	0	0	1	1	0	0	0	0	340
12:45	1	268	42	1	10	0	0	0	1	0	0	0	0	323
13:00	0	244	42	0	10	1	0	0	4	0	0	0	0	301
13:15	1	221	40	0	18	2	0	1	4	0	0	0	0	287
13:30	0	276	39	1	12	1	0	1	2	0	0	0	0	332
13:45	1	276	43	2	13	0	0	0	1	0	0	0	0	336
14:00	1	279	46	2	8	0	0	1	0	0	0	0	0	337
14:15	1	318	37	0	16	0	0	0	1	0	0	0	0	373
14:30	0	338	49	1	11	0	0	0	2	0	0	0	0	401
14:45	0	375	66	1	6	2	0	1	2	0	0	0	0	453
15:00	1	351	55	1	4	0	0	1	3	0	0	0	0	416
15:15	3	347	61	2	9	3	0	1	2	0	0	0	0	428
15:30	0	372	50	4	10	0	0	0	5	0	0	0	0	441
15:45	1	403	59	1	9	0	0	0	2	0	0	0	0	475
16:00	0	376	63	0	8	1	0	0	1	0	0	0	0	449
16:15	2	413	54	1	14	4	0	0	3	0	0	0	0	491
16:30	4	429	61	0	4	1	0	0	1	0	0	0	0	500
16:45	1	440	66	1	4	1	1	0	1	0	0	0	0	515
17:00	1	479	61	1	8	3	0	1	3	0	0	0	0	557
17:15	1	472	51	0	5	1	0	0	1	0	0	0	0	531
17:30	2	457	42	0	6	0	0	2	0	0	0	0	0	509
17:45	2	497	47	1	8	0	0	1	2	0	0	0	0	558
18:00	2	399	43	0	2	0	0	0	0	0	0	0	0	446
18:15	1	437	35	0	3	0	0	0	0	0	0	0	0	476
18:30	2	322	23	0	6	0	0	0	1	0	0	0	0	354
18:45	1	279	31	1	1	0	0	1	2	0	0	0	0	316
19:00	1	255	21	1	4	0	0	1	1	0	0	0	0	284
19:15	1	270	23	0	4	0	0	1	0	0	0	0	0	299
19:30	2	243	20	0	2	0	0	0	0	0	0	0	0	267
19:45	0	211	19	0	3	0	0	1	1	0	0	0	0	235
20:00	1	201	15	1	3	0	0	0	2	0	0	0	0	223
20:15	0	183	12	0	3	3	0	0	1	0	0	0	0	202
20:30	0	172	8	0	0	0	0	0	0	0	0	0	0	180
20:45	0	161	5	0	0	0	0	0	2	0	0	0	0	168
21:00	0	145	2	1	0	0	0	0	0	0	0	0	0	148
21:15	0	142	8	0	2	0	0	0	1	0	0	0	0	153
21:30	0	130	4	0	0	1	0	0	1	0	0	0	0	136
21:45	0	118	8	0	1	0	0	0	1	0	0	0	0	128
22:00	1	110	6	0	0	0	0	0	0	0	0	0	0	117
22:15	0	86	7	0	0	0	0	0	0	0	0	0	0	93
22:30	0	75	11	0	0	1	0	0	2	0	0	0	0	89
22:45	1	76	5	0	0	0	0	0	0	0	0	0	0	82
23:00	0	76	3	0	0	0	0	0	0	0	0	0	0	79
23:15	0	64	4	0	0	0	0	0	0	0	0	0	0	68
23:30	0	61	2	1	0	1	0	0	0	0	0	0	0	65
23:45	0	54	1	0	0	0	0	0	0	0	0	0	0	55
TOTAL	41	12,808	1,511	29	260	26	1	15	61	0	0	0	0	14,752

PM PEAK HOUR	5:00 PM
PM PEAK VOLUME	2,155

CLASS 1	Class 1 — Motorcycles	**CLASS 8**	3 to 4 Axles, Single Trailer
CLASS 2	Passenger Cars	**CLASS 9**	5 Axles, Single Trailer
CLASS 3	2 Axles, 4-Tire Single Units	**CLASS 10**	6 or More Axles, Single Trailer
CLASS 4	Buses	**CLASS 11**	5 or Less Axles, Multi-Trailers
CLASS 5	2 Axles, 6-Tire Single Units	**CLASS 12**	6 Axles, Multi-Trailers
CLASS 6	3 Axles, Single Unit	**CLASS 13**	7 or More Axles, Multi-Trailers
CLASS 7	4 or More Axles, Single Unit		

	1	2	3	4	5	6	7	8	9	10	11	12	13	
TOTAL: AM+PM	53	18,648	2,375	45	470	45	1	25	126	0	0	0	0	21,788
% OF TOTAL	0.2%	85.6%	10.9%	0.2%	2.2%	0.2%	0.0%	0.1%	0.6%	0.0%	0.0%	0.0%	0.0%	100.0%
Class	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**	**11**	**12**	**13**	
TOTAL: ALL	105	35,765	4,738	91	985	88	4	51	244	0	0	0	0	42,071
% OF TOTAL	0.5%	164.1%	21.7%	0.4%	4.5%	0.4%	0.0%	0.2%	1.1%	0.0%	0.0%	0.0%	0.0%	100.0%

24-HOUR ROADWAY SEGMENT COUNTS (WITH FHWA CLASSIFICATION)

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE: Tuesday, August 30, 2022
JOB #: SC3604

CITY: Cypress
LOCATION: TMC1 Douglas and Katella

AM	SOUTHBOUND													
TIME	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL
0:00	0	23	4	0	0	0	0	0	0	0	0	0	0	27
0:15	0	14	3	0	0	0	0	0	0	0	0	0	0	17
0:30	0	20	2	0	0	0	0	0	1	0	0	0	0	23
0:45	0	7	1	0	0	0	0	0	0	0	0	0	0	8
1:00	0	7	3	0	0	0	0	0	1	0	0	0	0	11
1:15	0	13	1	0	0	0	0	0	1	0	0	0	0	15
1:30	0	13	0	0	0	0	0	0	1	0	0	0	0	14
1:45	0	10	3	0	0	0	0	0	0	0	0	0	0	13
2:00	0	11	1	0	1	1	0	0	0	0	0	0	0	14
2:15	0	5	0	0	0	0	0	0	1	0	0	0	0	6
2:30	0	6	2	0	0	0	0	0	1	0	0	0	0	9
2:45	0	15	1	0	0	0	0	0	1	0	0	0	0	17
3:00	0	13	8	0	2	0	0	0	0	0	0	0	0	23
3:15	0	16	1	0	1	0	0	0	1	0	0	0	0	19
3:30	0	14	4	0	1	0	0	0	0	0	0	0	0	19
3:45	0	28	2	0	2	0	0	0	0	0	0	0	0	32
4:00	0	21	3	0	2	0	0	0	2	0	0	0	0	28
4:15	0	28	8	0	4	1	0	1	1	0	0	0	0	43
4:30	0	61	10	0	3	0	0	1	1	0	0	0	0	76
4:45	1	95	9	0	8	0	0	0	0	0	0	0	0	113
5:00	0	80	15	0	6	0	0	1	1	0	0	0	0	103
5:15	1	90	24	0	3	1	0	0	1	0	0	0	0	120
5:30	0	139	31	1	5	1	0	0	2	0	0	0	0	179
5:45	0	141	32	0	8	0	0	0	2	0	0	0	0	183
6:00	0	151	27	0	7	0	0	0	2	0	0	0	0	187
6:15	1	183	46	0	5	0	0	1	3	0	0	0	0	239
6:30	2	204	44	0	11	2	0	1	3	0	0	0	0	267
6:45	2	270	53	1	9	1	0	0	0	0	0	0	0	336
7:00	0	337	31	0	11	3	0	0	1	0	0	0	0	383
7:15	1	327	45	0	7	1	0	0	2	0	0	0	0	383
7:30	3	348	53	0	12	0	0	0	3	0	0	0	0	419
7:45	2	352	43	2	6	3	0	0	1	0	0	0	0	409
8:00	1	335	39	0	11	6	0	0	0	0	0	0	0	392
8:15	0	362	38	0	6	1	0	1	1	0	0	0	0	409
8:30	2	352	32	1	12	4	0	1	5	0	0	0	0	409
8:45	1	277	55	1	5	0	0	2	0	0	0	0	0	341
9:00	1	216	45	3	5	1	0	0	2	0	0	0	0	273
9:15	0	224	37	1	15	1	0	0	1	0	0	0	0	279
9:30	0	271	53	0	17	1	0	0	0	0	0	0	0	342
9:45	0	231	42	1	11	0	0	0	3	0	0	0	0	288
10:00	0	245	44	1	9	1	0	0	2	0	0	0	0	302
10:15	2	192	35	0	15	0	0	0	1	0	0	0	0	245
10:30	1	237	34	1	15	1	0	0	4	0	0	0	0	293
10:45	0	207	44	0	13	1	0	0	4	0	0	0	0	269
11:00	0	225	42	0	15	0	0	0	2	0	0	0	0	284
11:15	0	200	38	1	19	0	0	0	3	0	0	0	0	261
11:30	0	233	43	1	8	1	0	0	5	0	0	0	0	291
11:45	1	231	34	0	8	0	0	0	3	0	0	0	0	277
TOTAL	22	7,080	1,165	15	298	32	0	9	69	0	0	0	0	8,690

AM PEAK HOUR	7:30 AM
AM PEAK VOLUME	1,629

PM	SOUTHBOUND													
Time	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL
12:00	0	265	32	0	9	0	0	1	1	0	0	0	0	308
12:15	2	280	32	1	14	0	0	0	2	0	0	0	0	331
12:30	5	262	33	0	10	0	0	0	3	0	0	0	0	313
12:45	0	258	42	1	12	1	0	0	0	0	0	0	0	314
13:00	0	292	44	1	6	0	0	0	1	0	0	0	0	344
13:15	1	259	29	0	10	0	0	0	4	0	0	0	0	303
13:30	0	257	32	1	12	1	0	1	1	0	0	0	0	305
13:45	0	271	36	1	5	1	0	0	1	0	0	0	0	315
14:00	0	212	38	0	10	0	0	1	1	0	0	0	0	262
14:15	0	269	49	0	7	0	0	1	3	0	0	0	0	329
14:30	0	310	41	2	5	0	0	0	2	0	0	0	0	360
14:45	1	260	33	2	5	2	0	1	0	0	0	0	0	304
15:00	1	329	30	2	6	1	0	0	2	0	0	0	0	371
15:15	0	293	40	1	8	0	0	1	1	0	0	0	0	344
15:30	0	339	43	3	7	1	0	2	1	0	0	0	0	396
15:45	0	282	42	2	8	0	0	2	1	0	0	0	0	337
16:00	1	314	43	3	7	0	0	1	2	0	0	0	0	371
16:15	1	259	32	2	3	1	0	0	0	0	0	0	0	298
16:30	1	344	44	1	6	0	2	0	1	0	0	0	0	399
16:45	2	304	49	1	4	0	1	1	1	0	0	0	0	363
17:00	0	331	36	0	3	0	0	0	0	0	0	0	0	370
17:15	2	312	38	1	5	0	0	0	1	0	0	0	0	359
17:30	1	315	33	0	7	0	0	0	0	0	0	0	0	356
17:45	0	293	34	1	3	0	0	1	2	0	0	0	0	334
18:00	0	280	26	0	6	0	0	0	0	0	0	0	0	312
18:15	0	280	38	0	6	0	0	1	2	0	0	0	0	327
18:30	0	274	26	0	2	1	0	2	2	0	0	0	0	307
18:45	1	225	29	1	2	0	0	0	0	0	0	0	0	258
19:00	2	201	20	0	3	0	0	0	0	0	0	0	0	226
19:15	2	212	13	0	7	0	0	0	1	0	0	0	0	235
19:30	0	184	18	0	2	0	0	1	1	0	0	0	0	206
19:45	0	160	11	1	3	0	0	0	1	0	0	0	0	176
20:00	2	151	17	0	3	1	0	0	1	0	0	0	0	175
20:15	0	130	24	0	2	1	0	0	1	0	0	0	0	158
20:30	2	123	11	0	2	0	0	0	2	0	0	0	0	140
20:45	0	126	13	1	3	0	0	0	0	0	0	0	0	143
21:00	0	101	6	0	0	0	0	0	2	0	0	0	0	109
21:15	0	97	11	0	1	0	0	0	0	0	0	0	0	109
21:30	1	83	4	0	1	0	0	0	3	0	0	0	0	92
21:45	0	80	3	1	0	0	0	0	0	0	0	0	0	84
22:00	2	81	2	0	0	0	0	0	0	0	0	0	0	85
22:15	0	72	6	0	0	0	0	0	0	0	0	0	0	78
22:30	0	65	3	0	0	0	0	0	0	0	0	0	0	68
22:45	0	52	4	0	1	0	0	0	1	0	0	0	0	58
23:00	0	42	3	0	0	0	0	0	0	0	0	0	0	45
23:15	0	39	2	1	0	0	0	0	1	0	0	0	0	43
23:30	0	36	1	0	1	0	0	0	0	0	0	0	0	38
23:45	0	33	2	0	0	0	0	0	0	0	0	0	0	35
TOTAL	30	####	1,198	31	217	11	3	17	49	0	0	0	0	11,593

PM PEAK HOUR	4:30 PM
PM PEAK VOLUME	1,491

TOTAL: AM+PM	52	####	2,363	46	515	43	3	26	118	0	0	0	0	20,283
% OF TOTAL	0.3%	84.4%	11.7%	0.2%	2.5%	0.2%	0.0%	0.1%	0.6%	0.0%	0.0%	0.0%	0.0%	100.0%

Class	1	2	3	4	5	6	7	8	9	10	11	12	13

CLASS 1	Class 1 — Motorcycles	**CLASS 8**	3 to 4 Axles, Single Trailer
CLASS 2	Passenger Cars	**CLASS 9**	5 Axles, Single Trailer
CLASS 3	2 Axles, 4-Tire Single Units	**CLASS 10**	6 or More Axles, Single Trailer
CLASS 4	Buses	**CLASS 11**	5 or Less Axles, Multi-Trailers
CLASS 5	2 Axles, 6-Tire Single Units	**CLASS 12**	6 Axles, Multi-Trailers
CLASS 6	3 Axles, Single Unit	**CLASS 13**	7 or More Axles, Multi-Trailers
CLASS 7	4 or More Axles, Single Unit		

APPENDIX 3.2: EXISTING (2023) CONDITIONS INTERSECTION OPERATIONS ANALYSIS WORKSHEETS

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Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	SBL	SBT	SBR
Lane Configurations											
Traffic Volume (vph)	27	1702	72	12	1782	34	26	2	2	1	15
Future Volume (vph)	27	1702	72	12	1782	34	26	2	2	1	15
Turn Type	Prot	NA	Perm	Prot	NA	Perm	Perm	NA	Perm	NA	Perm
Protected Phases	5	2		1	6			8		4	
Permitted Phases			2			6	8		4		4
Detector Phase	5	2	2	1	6	6	8	8	4	4	4
Switch Phase											
Minimum Initial (s)	5.0	10.0	10.0	5.0	10.0	10.0	10.0	10.0	10.0	10.0	10.0
Minimum Split (s)	9.6	22.8	22.8	9.6	22.8	22.8	40.6	40.6	40.6	40.6	40.6
Total Split (s)	10.0	78.0	78.0	10.0	78.0	78.0	42.0	42.0	42.0	42.0	42.0
Total Split (%)	7.7%	60.0%	60.0%	7.7%	60.0%	60.0%	32.3%	32.3%	32.3%	32.3%	32.3%
Yellow Time (s)	3.6	4.8	4.8	3.6	4.8	4.8	3.6	3.6	3.6	3.6	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.8	5.8	4.6	5.8	5.8	4.6	4.6	4.6	4.6	4.6
Lead/Lag	Lead	Lag	Lag	Lead	Lag	Lag					
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes	Yes					
Recall Mode	None	C-Max	C-Max	None	C-Max	C-Max	None	None	None	None	None
Act Effct Green (s)	6.2	102.9	102.9	5.7	100.5	100.5	20.4	20.4	20.4	20.4	20.4
Actuated g/C Ratio	0.05	0.79	0.79	0.04	0.77	0.77	0.16	0.16	0.16	0.16	0.16
v/c Ratio	0.37	0.48	0.07	0.18	0.52	0.03	0.13	0.03	0.01	0.00	0.06
Control Delay	73.3	10.9	4.8	65.4	12.1	1.7	42.7	24.3	36.5	36.0	0.4
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	73.3	10.9	4.8	65.4	12.1	1.7	42.7	24.3	36.5	36.0	0.4
LOS	E	B	A	E	B	A	D	C	D	D	A
Approach Delay		11.6			12.3			38.9		6.1	
Approach LOS		B			B			D		A	

Intersection Summary	
Cycle Length: 130	
Actuated Cycle Length: 130	
Offset: 0 (0%), Referenced to phase 2:EBT and 6:WBT, Start of Yellow	
Natural Cycle: 90	
Control Type: Actuated-Coordinated	
Maximum v/c Ratio: 0.52	
Intersection Signal Delay: 12.1	Intersection LOS: B
Intersection Capacity Utilization 68.4%	ICU Level of Service C
Analysis Period (min) 15	

Splits and Phases: 1: Douglas Dr. & Katella Av.



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	27	1702	72	12	1782	34	26	2	5	2	1	15
Future Volume (veh/h)	27	1702	72	12	1782	34	26	2	5	2	1	15
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		0.98	1.00		0.98	0.99		0.98	1.00		0.98
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adj Flow Rate, veh/h	28	1773	67	12	1856	30	27	2	2	2	1	6
Peak Hour Factor	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	40	3802	1155	22	3751	1139	121	40	40	119	88	73
Arrive On Green	0.02	0.82	0.82	0.01	0.81	0.81	0.05	0.05	0.05	0.05	0.05	0.05
Sat Flow, veh/h	1619	4641	1410	1619	4641	1409	1273	771	771	1284	1700	1414
Grp Volume(v), veh/h	28	1773	67	12	1856	30	27	0	4	2	1	6
Grp Sat Flow(s),veh/h/ln	1619	1547	1410	1619	1547	1409	1273	0	1542	1284	1700	1414
Q Serve(g_s), s	2.2	14.5	1.2	1.0	16.6	0.5	2.7	0.0	0.3	0.2	0.1	0.5
Cycle Q Clear(g_c), s	2.2	14.5	1.2	1.0	16.6	0.5	2.7	0.0	0.3	0.5	0.1	0.5
Prop In Lane	1.00		1.00	1.00		1.00	1.00		0.50	1.00		1.00
Lane Grp Cap(c), veh/h	40	3802	1155	22	3751	1139	121	0	80	119	88	73
V/C Ratio(X)	0.71	0.47	0.06	0.55	0.49	0.03	0.22	0.00	0.05	0.02	0.01	0.08
Avail Cap(c_a), veh/h	67	3802	1155	67	3751	1139	421	0	444	422	489	407
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	62.9	3.4	2.2	63.7	4.0	2.4	59.8	0.0	58.6	58.8	58.5	58.7
Incr Delay (d2), s/veh	8.3	0.4	0.1	7.7	0.5	0.0	0.9	0.0	0.3	0.1	0.1	0.5
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.0	3.0	0.2	0.4	3.7	0.1	0.9	0.0	0.1	0.1	0.0	0.2
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	71.2	3.8	2.3	71.4	4.4	2.5	60.7	0.0	58.8	58.9	58.5	59.2
LnGrp LOS	E	A	A	E	A	A	E	A	E	E	E	E
Approach Vol, veh/h		1868			1898			31			9	
Approach Delay, s/veh		4.8			4.8			60.5			59.0	
Approach LOS		A			A			E			E	

Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	6.4	112.3		11.3	7.8	110.9		11.3				
Change Period (Y+Rc), s	4.6	5.8		4.6	4.6	5.8		4.6				
Max Green Setting (Gmax), s	5.4	72.2		37.4	5.4	72.2		37.4				
Max Q Clear Time (g_c+I1), s	3.0	16.5		2.5	4.2	18.6		4.7				
Green Ext Time (p_c), s	0.0	20.4		0.0	0.0	21.5		0.1				

Intersection Summary			
HCM 6th Ctrl Delay		5.4	
HCM 6th LOS		A	

Notes

User approved pedestrian interval to be less than phase max green.

Goodman Commerce Center (JN 15593)
Existing (2023)
AM Peak Hour

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Base Volume Alternative)

Intersection #1 Douglas Dr. & Katella Av.

Cycle (sec):	100	Critical Vol./Cap.(X):	0.439
Loss Time (sec):	5	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	21	Level Of Service:	A

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	1 0	0	1 0	1 0	1	0 1	1 0	3	0 1	1 0	3	0 1
Volume Module:												
Base Vol:	26	2	5	2	1	15	27	1702	72	12	1782	34
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	26	2	5	2	1	15	27	1702	72	12	1782	34
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	26	2	5	2	1	15	27	1702	72	12	1782	34
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	26	2	5	2	1	15	27	1702	72	12	1782	34
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	26	2	5	2	1	15	27	1702	72	12	1782	34
Saturation Flow Module:												
Sat/Lane:	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	1.00	0.29	0.71	1.00	1.00	1.00	1.00	3.00	1.00	1.00	3.00	1.00
Final Sat.:	1700	486	1214	1700	1700	1700	1700	5100	1700	1700	5100	1700
Capacity Analysis Module:												
Vol/Sat:	0.02	0.00	0.00	0.00	0.00	0.01	0.02	0.33	0.04	0.01	0.35	0.01
Crit Moves:	****					****	****				****	

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Intersection	
Intersection Delay, s/veh	7.2
Intersection LOS	A

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	0	0	53	0	0	0	0	21	0	0	0
Future Vol, veh/h	0	0	0	53	0	0	0	0	21	0	0	0
Peak Hour Factor	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86
Heavy Vehicles, %	0	0	0	0	0	0	0	0	0	0	0	0
Mvmt Flow	0	0	0	62	0	0	0	0	24	0	0	0
Number of Lanes	0	0	0	1	0	0	0	0	1	0	0	0

Approach	WB	NB
Opposing Approach		
Opposing Lanes	0	0
Conflicting Approach Left	NB	
Conflicting Lanes Left	1	0
Conflicting Approach Right		WB
Conflicting Lanes Right	0	1
HCM Control Delay	7.5	6.5
HCM LOS	A	A

Lane	NBLn1	WBLn1
Vol Left, %	0%	100%
Vol Thru, %	0%	0%
Vol Right, %	100%	0%
Sign Control	Stop	Stop
Traffic Vol by Lane	21	53
LT Vol	0	53
Through Vol	0	0
RT Vol	21	0
Lane Flow Rate	24	62
Geometry Grp	1	1
Degree of Util (X)	0.023	0.071
Departure Headway (Hd)	3.408	4.143
Convergence, Y/N	Yes	Yes
Cap	1047	870
Service Time	1.439	2.145
HCM Lane V/C Ratio	0.023	0.071
HCM Control Delay	6.5	7.5
HCM Lane LOS	A	A
HCM 95th-tile Q	0.1	0.2

Intersection	
Int Delay, s/veh	4

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	23	0	8	104	4	19	2	77	0	0	0
Future Vol, veh/h	0	23	0	8	104	4	19	2	77	0	0	0
Conflicting Peds, #/hr	0	0	0	0	0	0	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	100	-	-	100	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	1	-	-	1	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	85	85	85	85	85	85	85	85	85	85	85	85
Heavy Vehicles, %	0	0	0	0	0	0	0	0	0	0	0	0
Mvmt Flow	0	27	0	9	122	5	22	2	91	0	0	0

Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	127	0	0	27	0	0	170	172	27	217	170	125
Stage 1	-	-	-	-	-	-	27	27	-	143	143	-
Stage 2	-	-	-	-	-	-	143	145	-	74	27	-
Critical Hdwy	4.1	-	-	4.1	-	-	7.1	6.5	6.2	7.1	6.5	6.2
Critical Hdwy Stg 1	-	-	-	-	-	-	6.1	5.5	-	6.1	5.5	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.1	5.5	-	6.1	5.5	-
Follow-up Hdwy	2.2	-	-	2.2	-	-	3.5	4	3.3	3.5	4	3.3
Pot Cap-1 Maneuver	1472	-	-	1600	-	-	798	725	1054	744	727	931
Stage 1	-	-	-	-	-	-	996	877	-	865	782	-
Stage 2	-	-	-	-	-	-	865	781	-	940	877	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	1472	-	-	1600	-	-	795	721	1054	676	723	931
Mov Cap-2 Maneuver	-	-	-	-	-	-	771	695	-	699	696	-
Stage 1	-	-	-	-	-	-	996	877	-	865	777	-
Stage 2	-	-	-	-	-	-	860	776	-	857	877	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	0	0.5	9.2	0
HCM LOS			A	A

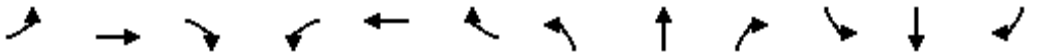
Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1
Capacity (veh/h)	974	1472	-	-	1600	-	-	-
HCM Lane V/C Ratio	0.118	-	-	-	0.006	-	-	-
HCM Control Delay (s)	9.2	0	-	-	7.3	-	-	0
HCM Lane LOS	A	A	-	-	A	-	-	A
HCM 95th %tile Q(veh)	0.4	0	-	-	0	-	-	-

Lane Group	EBL	EBT	WBL	WBT	NBL	NBT	SBL	SBT
Lane Configurations								
Traffic Volume (vph)	9	9	12	0	22	1516	254	1551
Future Volume (vph)	9	9	12	0	22	1516	254	1551
Turn Type	Perm	NA	Perm	NA	Prot	NA	Prot	NA
Protected Phases		4		8	5	2	1	6
Permitted Phases	4		8					
Detector Phase	4	4	8	8	5	2	1	6
Switch Phase								
Minimum Initial (s)	10.0	10.0	10.0	10.0	5.0	10.0	5.0	10.0
Minimum Split (s)	37.6	37.6	14.6	14.6	9.6	22.8	9.6	22.8
Total Split (s)	38.0	38.0	38.0	38.0	11.0	61.0	31.0	81.0
Total Split (%)	29.2%	29.2%	29.2%	29.2%	8.5%	46.9%	23.8%	62.3%
Yellow Time (s)	3.6	3.6	3.6	3.6	3.6	4.8	3.6	4.8
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	4.6	4.6	4.6	4.6	5.8	4.6	5.8
Lead/Lag					Lead	Lag	Lead	Lag
Lead-Lag Optimize?					Yes	Yes	Yes	Yes
Recall Mode	None	None	None	None	None	C-Max	None	C-Max
Act Effct Green (s)	19.2	19.2	19.2	19.2	6.0	75.0	23.7	97.8
Actuated g/C Ratio	0.15	0.15	0.15	0.15	0.05	0.58	0.18	0.75
v/c Ratio	0.05	0.10	0.06	0.08	0.30	0.65	0.87	0.50
Control Delay	40.8	23.4	41.4	0.3	70.0	23.8	79.8	10.9
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	40.8	23.4	41.4	0.3	70.0	23.8	79.8	10.9
LOS	D	C	D	A	E	C	E	B
Approach Delay		28.1		10.0		24.4		19.9
Approach LOS		C		A		C		B

Intersection Summary	
Cycle Length: 130	
Actuated Cycle Length: 130	
Offset: 0 (0%), Referenced to phase 2:NBT and 6:SBT, Start of Yellow	
Natural Cycle: 100	
Control Type: Actuated-Coordinated	
Maximum v/c Ratio: 0.87	
Intersection Signal Delay: 21.9	Intersection LOS: C
Intersection Capacity Utilization 75.7%	ICU Level of Service D
Analysis Period (min) 15	

Splits and Phases: 4: Valley View St. & Plaza Dr./Chip Av.





Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	9	9	15	12	0	39	22	1516	181	254	1551	154
Future Volume (veh/h)	9	9	15	12	0	39	22	1516	181	254	1551	154
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		0.99	0.99		1.00	1.00		0.98	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adj Flow Rate, veh/h	9	9	10	12	0	33	22	1531	181	257	1567	153
Peak Hour Factor	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	105	45	50	118	0	89	34	2728	322	279	3446	336
Arrive On Green	0.06	0.06	0.06	0.06	0.00	0.06	0.02	0.65	0.65	0.17	0.80	0.80
Sat Flow, veh/h	1251	731	812	1250	0	1441	1619	4195	495	1619	4299	419
Grp Volume(v), veh/h	9	0	19	12	0	33	22	1129	583	257	1127	593
Grp Sat Flow(s),veh/h/ln	1251	0	1543	1250	0	1441	1619	1547	1597	1619	1547	1624
Q Serve(g_s), s	0.9	0.0	1.5	1.2	0.0	2.9	1.8	26.1	26.2	20.3	14.8	14.8
Cycle Q Clear(g_c), s	3.8	0.0	1.5	2.7	0.0	2.9	1.8	26.1	26.2	20.3	14.8	14.8
Prop In Lane	1.00		0.53	1.00		1.00	1.00		0.31	1.00		0.26
Lane Grp Cap(c), veh/h	105	0	95	118	0	89	34	2012	1038	279	2481	1302
V/C Ratio(X)	0.09	0.00	0.20	0.10	0.00	0.37	0.64	0.56	0.56	0.92	0.45	0.46
Avail Cap(c_a), veh/h	349	0	396	362	0	370	80	2012	1038	329	2481	1302
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	60.4	0.0	57.9	59.2	0.0	58.6	63.1	12.5	12.5	52.9	4.0	4.0
Incr Delay (d2), s/veh	0.3	0.0	1.0	0.4	0.0	2.6	7.3	1.1	2.2	25.8	0.6	1.1
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.3	0.0	0.6	0.4	0.0	1.1	0.8	8.4	9.0	10.0	3.4	3.8
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	60.7	0.0	58.9	59.6	0.0	61.1	70.5	13.7	14.7	78.7	4.6	5.2
LnGrp LOS	E	A	E	E	A	E	E	B	B	E	A	A
Approach Vol, veh/h		28			45			1734			1977	
Approach Delay, s/veh		59.5			60.7			14.7			14.4	
Approach LOS		E			E			B			B	

Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	27.0	90.3		12.6	7.3	110.0		12.6				
Change Period (Y+Rc), s	4.6	5.8		4.6	4.6	5.8		4.6				
Max Green Setting (Gmax), s	26.4	55.2		33.4	6.4	75.2		33.4				
Max Q Clear Time (g_c+I1), s	22.3	28.2		5.8	3.8	16.8		4.9				
Green Ext Time (p_c), s	0.1	13.4		0.1	0.0	17.6		0.2				

Intersection Summary			
HCM 6th Ctrl Delay		15.4	
HCM 6th LOS		B	

Goodman Commerce Center (JN 15593)
Existing (2023)
AM Peak Hour

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Base Volume Alternative)

Intersection #4 Valley View St. & Plaza Dr.

Cycle (sec):	100	Critical Vol./Cap.(X):	0.560
Loss Time (sec):	5	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	27	Level Of Service:	A

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Protected			Protected			Permitted			Permitted		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	1 0	2	1 0	1 0	2	1 0	1 0	0	1 0	1 0	0	1 0
Volume Module:												
Base Vol:	22	1516	181	254	1551	154	9	9	15	12	0	39
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	22	1516	181	254	1551	154	9	9	15	12	0	39
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	22	1516	181	254	1551	154	9	9	15	12	0	39
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	22	1516	181	254	1551	154	9	9	15	12	0	39
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	22	1516	181	254	1551	154	9	9	15	12	0	39
Saturation Flow Module:												
Sat/Lane:	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	1.00	2.68	0.32	1.00	2.73	0.27	1.00	0.38	0.62	1.00	0.00	1.00
Final Sat.:	1700	4556	544	1700	4639	461	1700	638	1063	1700	0	1700
Capacity Analysis Module:												
Vol/Sat:	0.01	0.33	0.33	0.15	0.33	0.33	0.01	0.01	0.01	0.01	0.00	0.02
Crit Moves:		****			****			****				****

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Goodman Commerce Center (JN 15593)
Existing (2023)
PM Peak Hour

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Base Volume Alternative)

Intersection #1 Douglas Dr. & Katella Av.

Cycle (sec):	100	Critical Vol./Cap.(X):	0.517
Loss Time (sec):	5	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	24	Level Of Service:	A

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	1 0	0 1	0	1 0	1 0	1	1 0	3 0	1	1 0	3 0	1
Volume Module:												
Base Vol:	83	1	7	26	2	47	11	1963	32	9	1608	6
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	83	1	7	26	2	47	11	1963	32	9	1608	6
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	83	1	7	26	2	47	11	1963	32	9	1608	6
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	83	1	7	26	2	47	11	1963	32	9	1608	6
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	83	1	7	26	2	47	11	1963	32	9	1608	6
Saturation Flow Module:												
Sat/Lane:	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	1.00	0.12	0.88	1.00	1.00	1.00	1.00	3.00	1.00	1.00	3.00	1.00
Final Sat.:	1700	213	1488	1700	1700	1700	1700	5100	1700	1700	5100	1700
Capacity Analysis Module:												
Vol/Sat:	0.05	0.00	0.00	0.02	0.00	0.03	0.01	0.38	0.02	0.01	0.32	0.00
Crit Moves:	****					****		****		****		

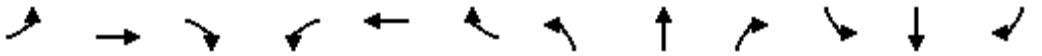
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Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	SBL	SBT	SBR
Lane Configurations											
Traffic Volume (vph)	11	1963	32	9	1608	6	83	1	26	2	47
Future Volume (vph)	11	1963	32	9	1608	6	83	1	26	2	47
Turn Type	Prot	NA	Perm	Prot	NA	Perm	Perm	NA	Perm	NA	Perm
Protected Phases	5	2		1	6			8		4	
Permitted Phases			2			6	8		4		4
Detector Phase	5	2	2	1	6	6	8	8	4	4	4
Switch Phase											
Minimum Initial (s)	5.0	10.0	10.0	5.0	10.0	10.0	10.0	10.0	10.0	10.0	10.0
Minimum Split (s)	9.6	22.8	22.8	9.6	22.8	22.8	40.6	40.6	40.6	40.6	40.6
Total Split (s)	10.0	78.0	78.0	10.0	78.0	78.0	42.0	42.0	42.0	42.0	42.0
Total Split (%)	7.7%	60.0%	60.0%	7.7%	60.0%	60.0%	32.3%	32.3%	32.3%	32.3%	32.3%
Yellow Time (s)	3.6	4.8	4.8	3.6	4.8	4.8	3.6	3.6	3.6	3.6	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.8	5.8	4.6	5.8	5.8	4.6	4.6	4.6	4.6	4.6
Lead/Lag	Lead	Lag	Lag	Lead	Lag	Lag					
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes	Yes					
Recall Mode	None	C-Max	C-Max	None	C-Max	C-Max	None	None	None	None	None
Act Effct Green (s)	5.7	95.6	95.6	5.6	93.4	93.4	21.8	21.8	21.8	21.8	21.8
Actuated g/C Ratio	0.04	0.74	0.74	0.04	0.72	0.72	0.17	0.17	0.17	0.17	0.17
v/c Ratio	0.17	0.65	0.03	0.14	0.54	0.01	0.43	0.04	0.14	0.01	0.18
Control Delay	65.0	13.0	1.8	64.1	12.4	0.0	51.5	19.6	41.8	36.0	8.1
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	65.0	13.0	1.8	64.1	12.4	0.0	51.5	19.6	41.8	36.0	8.1
LOS	E	B	A	E	B	A	D	B	D	D	A
Approach Delay		13.1			12.6			48.7		20.4	
Approach LOS		B			B			D		C	

Intersection Summary	
Cycle Length: 130	
Actuated Cycle Length: 130	
Offset: 0 (0%), Referenced to phase 2:EBT and 6:WBT, Start of Yellow	
Natural Cycle: 100	
Control Type: Actuated-Coordinated	
Maximum v/c Ratio: 0.65	
Intersection Signal Delay: 13.9	Intersection LOS: B
Intersection Capacity Utilization 63.9%	ICU Level of Service B
Analysis Period (min) 15	

Splits and Phases: 1: Douglas Dr. & Katella Av.





Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	11	1963	32	9	1608	6	83	1	7	26	2	47
Future Volume (veh/h)	11	1963	32	9	1608	6	83	1	7	26	2	47
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		0.98	1.00		0.98	1.00		1.00	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adj Flow Rate, veh/h	12	2206	30	10	1807	7	93	1	4	29	2	19
Peak Hour Factor	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	22	3641	1105	19	3632	1104	166	26	105	165	150	126
Arrive On Green	0.01	0.78	0.78	0.01	0.78	0.78	0.09	0.09	0.09	0.09	0.09	0.09
Sat Flow, veh/h	1619	4641	1409	1619	4641	1410	1264	297	1189	1283	1700	1420
Grp Volume(v), veh/h	12	2206	30	10	1807	7	93	0	5	29	2	19
Grp Sat Flow(s),veh/h/ln	1619	1547	1409	1619	1547	1410	1264	0	1486	1283	1700	1420
Q Serve(g_s), s	1.0	25.4	0.6	0.8	18.0	0.1	9.4	0.0	0.4	2.8	0.1	1.6
Cycle Q Clear(g_c), s	1.0	25.4	0.6	0.8	18.0	0.1	9.6	0.0	0.4	3.2	0.1	1.6
Prop In Lane	1.00		1.00	1.00		1.00	1.00		0.80	1.00		1.00
Lane Grp Cap(c), veh/h	22	3641	1105	19	3632	1104	166	0	132	165	150	126
V/C Ratio(X)	0.55	0.61	0.03	0.53	0.50	0.01	0.56	0.00	0.04	0.18	0.01	0.15
Avail Cap(c_a), veh/h	67	3641	1105	67	3632	1104	418	0	428	420	489	408
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	63.7	5.8	3.1	63.9	5.0	3.1	58.4	0.0	54.2	55.6	54.1	54.7
Incr Delay (d2), s/veh	7.7	0.8	0.0	8.3	0.5	0.0	2.9	0.0	0.1	0.5	0.0	0.6
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.4	6.2	0.1	0.4	4.4	0.0	3.2	0.0	0.2	0.9	0.1	0.6
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	71.4	6.5	3.1	72.2	5.5	3.1	61.4	0.0	54.3	56.1	54.1	55.3
LnGrp LOS	E	A	A	E	A	A	E	A	D	E	D	E
Approach Vol, veh/h		2248			1824			98			50	
Approach Delay, s/veh		6.8			5.9			61.0			55.7	
Approach LOS		A			A			E			E	

Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	6.1	107.8		16.1	6.4	107.5		16.1				
Change Period (Y+Rc), s	4.6	5.8		4.6	4.6	5.8		4.6				
Max Green Setting (Gmax), s	5.4	72.2		37.4	5.4	72.2		37.4				
Max Q Clear Time (g_c+I1), s	2.8	27.4		5.2	3.0	20.0		11.6				
Green Ext Time (p_c), s	0.0	26.4		0.1	0.0	20.2		0.3				

Intersection Summary			
HCM 6th Ctrl Delay		8.2	
HCM 6th LOS		A	

Intersection	
Intersection Delay, s/veh	7.7
Intersection LOS	A

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	0	0	100	0	0	0	0	24	0	0	0
Future Vol, veh/h	0	0	0	100	0	0	0	0	24	0	0	0
Peak Hour Factor	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75
Heavy Vehicles, %	0	0	0	0	0	0	0	0	0	0	0	0
Mvmt Flow	0	0	0	133	0	0	0	0	32	0	0	0
Number of Lanes	0	0	0	1	0	0	0	0	1	0	0	0

Approach	WB	NB
Opposing Approach		
Opposing Lanes	0	0
Conflicting Approach Left	NB	
Conflicting Lanes Left	1	0
Conflicting Approach Right		WB
Conflicting Lanes Right	0	1
HCM Control Delay	7.9	6.7
HCM LOS	A	A

Lane	NBLn1	WBLn1
Vol Left, %	0%	100%
Vol Thru, %	0%	0%
Vol Right, %	100%	0%
Sign Control	Stop	Stop
Traffic Vol by Lane	24	100
LT Vol	0	100
Through Vol	0	0
RT Vol	24	0
Lane Flow Rate	32	133
Geometry Grp	1	1
Degree of Util (X)	0.031	0.154
Departure Headway (Hd)	3.533	4.155
Convergence, Y/N	Yes	Yes
Cap	1000	867
Service Time	1.601	2.161
HCM Lane V/C Ratio	0.032	0.153
HCM Control Delay	6.7	7.9
HCM Lane LOS	A	A
HCM 95th-tile Q	0.1	0.5

Intersection	
Int Delay, s/veh	1.3

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	86	2	11	80	0	5	0	9	0	3	0
Future Vol, veh/h	0	86	2	11	80	0	5	0	9	0	3	0
Conflicting Peds, #/hr	0	0	0	0	0	0	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	100	-	-	100	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	1	-	-	1	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	63	63	63	63	63	63	63	63	63	63	63	63
Heavy Vehicles, %	0	0	0	0	0	0	0	0	0	0	0	0
Mvmt Flow	0	137	3	17	127	0	8	0	14	0	5	0

Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	127	0	0	140	0	0	303	300	139	307	301	127
Stage 1	-	-	-	-	-	-	139	139	-	161	161	-
Stage 2	-	-	-	-	-	-	164	161	-	146	140	-
Critical Hdwy	4.1	-	-	4.1	-	-	7.1	6.5	6.2	7.1	6.5	6.2
Critical Hdwy Stg 1	-	-	-	-	-	-	6.1	5.5	-	6.1	5.5	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.1	5.5	-	6.1	5.5	-
Follow-up Hdwy	2.2	-	-	2.2	-	-	3.5	4	3.3	3.5	4	3.3
Pot Cap-1 Maneuver	1472	-	-	1456	-	-	653	616	915	649	615	929
Stage 1	-	-	-	-	-	-	869	785	-	846	769	-
Stage 2	-	-	-	-	-	-	843	769	-	861	785	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	1472	-	-	1456	-	-	643	609	915	633	608	929
Mov Cap-2 Maneuver	-	-	-	-	-	-	680	630	-	671	626	-
Stage 1	-	-	-	-	-	-	869	785	-	846	760	-
Stage 2	-	-	-	-	-	-	828	760	-	848	785	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	0	0.9	9.5	10.8
HCM LOS			A	B

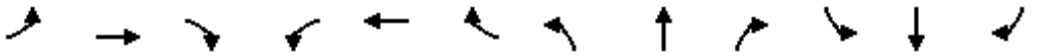
Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1
Capacity (veh/h)	814	1472	-	-	1456	-	-	626
HCM Lane V/C Ratio	0.027	-	-	-	0.012	-	-	0.008
HCM Control Delay (s)	9.5	0	-	-	7.5	-	-	10.8
HCM Lane LOS	A	A	-	-	A	-	-	B
HCM 95th %tile Q(veh)	0.1	0	-	-	0	-	-	0

Lane Group	EBL	EBT	WBL	WBT	NBL	NBT	SBL	SBT
Lane Configurations								
Traffic Volume (vph)	168	0	162	30	4	1967	52	1503
Future Volume (vph)	168	0	162	30	4	1967	52	1503
Turn Type	Perm	NA	Perm	NA	Prot	NA	Prot	NA
Protected Phases		4		8	5	2	1	6
Permitted Phases	4		8					
Detector Phase	4	4	8	8	5	2	1	6
Switch Phase								
Minimum Initial (s)	10.0	10.0	10.0	10.0	5.0	10.0	5.0	10.0
Minimum Split (s)	37.6	37.6	14.6	14.6	9.6	22.8	9.6	22.8
Total Split (s)	50.0	50.0	50.0	50.0	11.0	69.0	11.0	69.0
Total Split (%)	38.5%	38.5%	38.5%	38.5%	8.5%	53.1%	8.5%	53.1%
Yellow Time (s)	3.6	3.6	3.6	3.6	3.6	4.8	3.6	4.8
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	4.6	4.6	4.6	4.6	5.8	4.6	5.8
Lead/Lag					Lead	Lag	Lead	Lag
Lead-Lag Optimize?					Yes	Yes	Yes	Yes
Recall Mode	None	None	None	None	None	C-Max	None	C-Max
Act Effct Green (s)	45.4	45.4	45.4	45.4	5.2	65.4	6.2	72.1
Actuated g/C Ratio	0.35	0.35	0.35	0.35	0.04	0.50	0.05	0.55
v/c Ratio	0.99	0.11	0.40	0.69	0.06	0.88	0.71	0.62
Control Delay	107.9	0.9	35.5	33.8	62.0	35.2	104.3	21.4
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	107.9	0.9	35.5	33.8	62.0	35.2	104.3	21.4
LOS	F	A	D	C	E	D	F	C
Approach Delay		79.2		34.3		35.2		24.1
Approach LOS		E		C		D		C

Intersection Summary	
Cycle Length: 130	
Actuated Cycle Length: 130	
Offset: 0 (0%), Referenced to phase 2:NBT and 6:SBT, Start of Yellow	
Natural Cycle: 90	
Control Type: Actuated-Coordinated	
Maximum v/c Ratio: 0.99	
Intersection Signal Delay: 33.4	Intersection LOS: C
Intersection Capacity Utilization 97.5%	ICU Level of Service F
Analysis Period (min) 15	

Splits and Phases: 4: Valley View St. & Plaza Dr./Chip Av.





Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	168	0	61	162	30	355	4	1967	12	52	1503	23
Future Volume (veh/h)	168	0	61	162	30	355	4	1967	12	52	1503	23
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		0.98	1.00		0.97
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adj Flow Rate, veh/h	175	0	44	169	31	311	4	2049	12	54	1566	21
Peak Hour Factor	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	197	0	503	462	46	464	8	2351	14	67	2501	34
Arrive On Green	0.35	0.00	0.35	0.35	0.35	0.35	0.01	0.49	0.49	0.04	0.53	0.53
Sat Flow, veh/h	944	0	1439	1237	132	1328	1619	4760	28	1619	4717	63
Grp Volume(v), veh/h	175	0	44	169	0	342	4	1331	730	54	1027	560
Grp Sat Flow(s),veh/h/ln	944	0	1439	1237	0	1461	1619	1547	1694	1619	1547	1687
Q Serve(g_s), s	19.5	0.0	2.7	13.8	0.0	25.9	0.3	49.7	49.8	4.3	30.3	30.4
Cycle Q Clear(g_c), s	45.4	0.0	2.7	16.5	0.0	25.9	0.3	49.7	49.8	4.3	30.3	30.4
Prop In Lane	1.00		1.00	1.00		0.91	1.00		0.02	1.00		0.04
Lane Grp Cap(c), veh/h	197	0	503	462	0	510	8	1528	837	67	1640	894
V/C Ratio(X)	0.89	0.00	0.09	0.37	0.00	0.67	0.48	0.87	0.87	0.80	0.63	0.63
Avail Cap(c_a), veh/h	197	0	503	462	0	510	80	1528	837	80	1640	894
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	57.1	0.0	28.4	33.9	0.0	35.9	64.5	29.2	29.2	61.8	21.5	21.5
Incr Delay (d2), s/veh	35.0	0.0	0.1	0.5	0.0	3.4	14.8	7.1	12.1	32.4	1.8	3.3
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	7.8	0.0	1.0	4.3	0.0	9.8	0.2	18.7	21.7	2.3	10.7	12.1
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	92.0	0.0	28.5	34.4	0.0	39.3	79.3	36.3	41.4	94.2	23.3	24.8
LnGrp LOS	F	A	C	C	A	D	E	D	D	F	C	C
Approach Vol, veh/h		219			511			2065			1641	
Approach Delay, s/veh		79.3			37.7			38.2			26.1	
Approach LOS		E			D			D			C	

Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	10.0	70.0		50.0	5.3	74.7		50.0				
Change Period (Y+Rc), s	4.6	5.8		4.6	4.6	5.8		4.6				
Max Green Setting (Gmax), s	6.4	63.2		45.4	6.4	63.2		45.4				
Max Q Clear Time (g_c+I1), s	6.3	51.8		47.4	2.3	32.4		27.9				
Green Ext Time (p_c), s	0.0	8.8		0.0	0.0	12.6		2.8				

Intersection Summary			
HCM 6th Ctrl Delay		35.7	
HCM 6th LOS		D	

Goodman Commerce Center (JN 15593)
Existing (2023)
PM Peak Hour

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Base Volume Alternative)

Intersection #4 Valley View St. & Plaza Dr.

Cycle (sec):	100	Critical Vol./Cap.(X):	0.794
Loss Time (sec):	5	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	51	Level Of Service:	C

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Protected			Protected			Permitted			Permitted		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	1 0	2	1 0	1 0	2	1 0	1 0	0	1 0	1 0	0	1 0
Volume Module:												
Base Vol:	4	1967	12	52	1503	23	168	0	61	162	30	355
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	4	1967	12	52	1503	23	168	0	61	162	30	355
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	4	1967	12	52	1503	23	168	0	61	162	30	355
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	4	1967	12	52	1503	23	168	0	61	162	30	355
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	4	1967	12	52	1503	23	168	0	61	162	30	355
Saturation Flow Module:												
Sat/Lane:	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	1.00	2.98	0.02	1.00	2.95	0.05	1.00	0.00	1.00	1.00	0.08	0.92
Final Sat.:	1700	5069	31	1700	5023	77	1700	0	1700	1700	132	1568
Capacity Analysis Module:												
Vol/Sat:	0.00	0.39	0.39	0.03	0.30	0.30	0.10	0.00	0.04	0.10	0.23	0.23
Crit Moves:		****			****			****			****	

Traffix 8.0.0715 (c) 2008 Dowling Assoc. Licensed to URBAN CROSSROADS, IRVINE

APPENDIX 3.3: EXISTING (2023) CONDITIONS TRAFFIC SIGNAL WARRANT ANALYSIS WORKSHEETS

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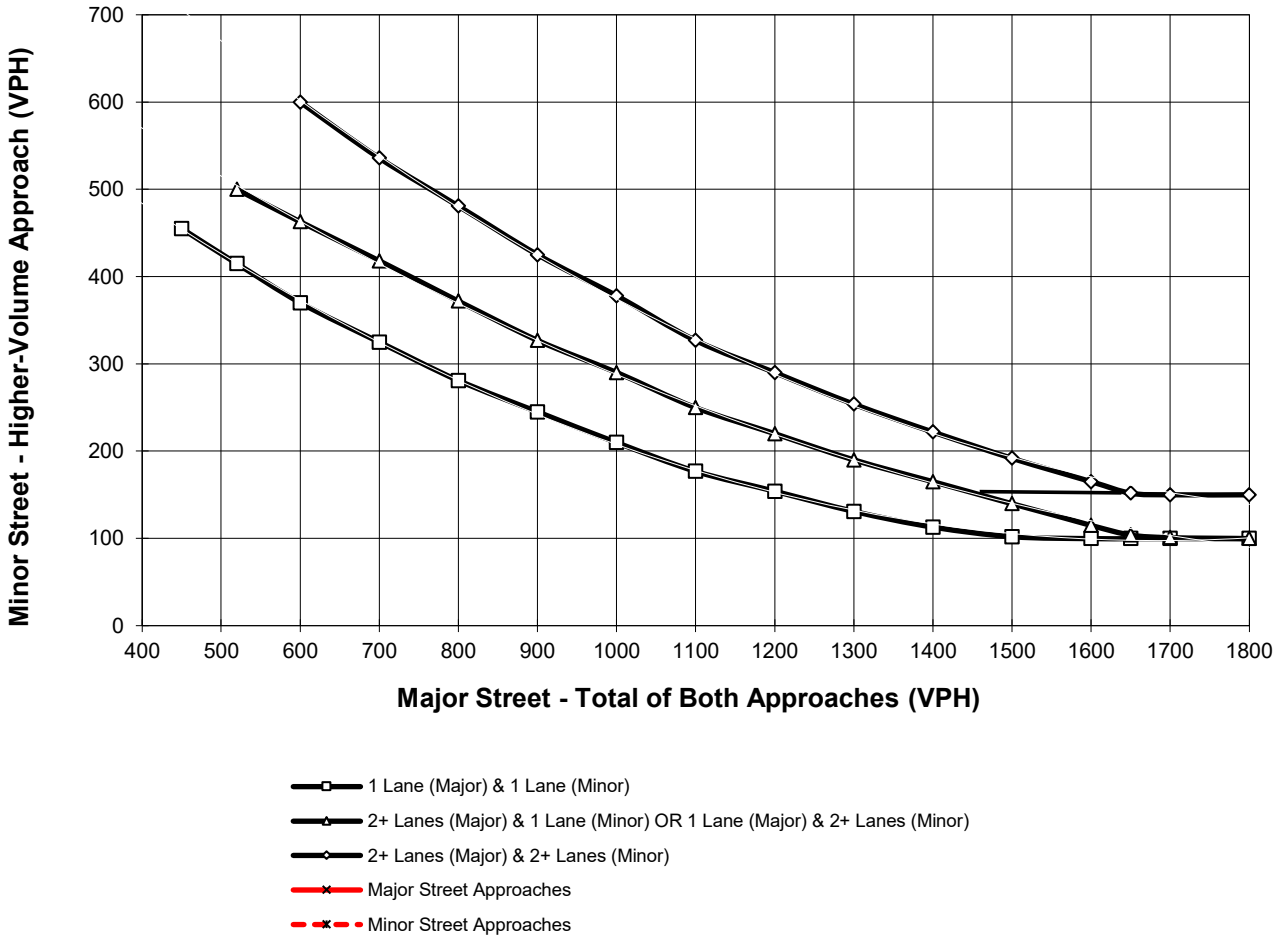
Figure 4C-3. Warrant 3, Peak Hour

Traffic Conditions = **Existing (2023) Conditions - Weekday AM Peak Hour**

Major Street Name = **Plaza Dr.**
Total of Both Approaches (VPH) = **53**
Number of Approach Lanes on Major Street = **1**

Minor Street Name = **Douglas Dr.**
High Volume Approach (VPH) = **21**
Number of Approach Lanes On Minor Street = **1**

SIGNAL WARRANT NOT SATISFIED



*Note: 150 vph applies as the lower threshold for a minor-street approach with two or more lanes and 100 vph applies as the lower threshold for a minor-street approach with one lane

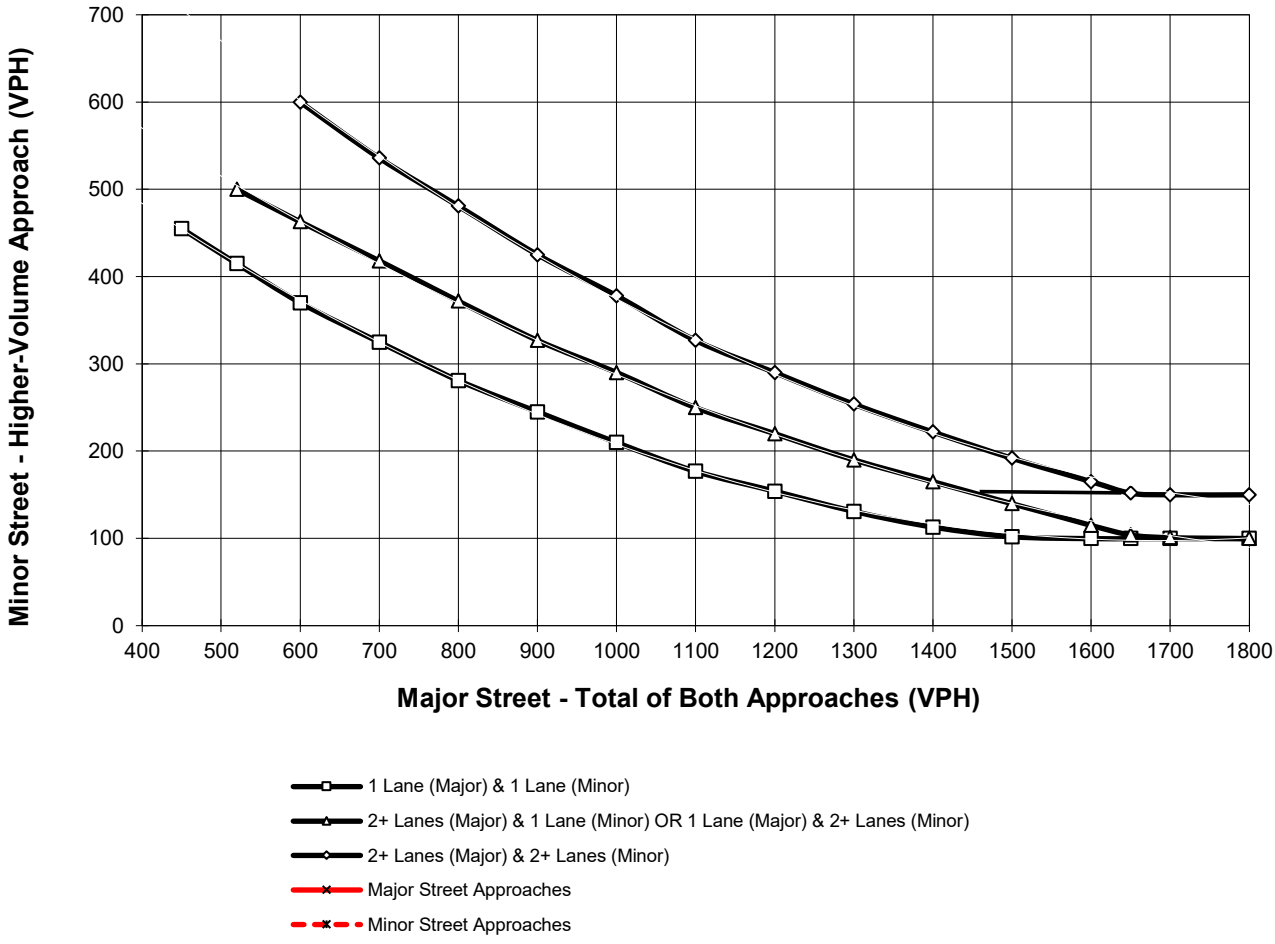
Figure 4C-3. Warrant 3, Peak Hour

Traffic Conditions = **Existing (2023) Conditions - Weekday PM Peak Hour**

Major Street Name = **Plaza Dr.**
Total of Both Approaches (VPH) = **179**
Number of Approach Lanes on Major Street = **1**

Minor Street Name = **McDonnell Dr.**
High Volume Approach (VPH) = **14**
Number of Approach Lanes On Minor Street = **1**

SIGNAL WARRANT NOT SATISFIED



*Note: 150 vph applies as the lower threshold for a minor-street approach with two or more lanes and 100 vph applies as the lower threshold for a minor-street approach with one lane

APPENDIX 5.1: EXISING PLUS PROJECT CONDITIONS INTERSECTION OPERATIONS ANALYSIS WORKSHEETS

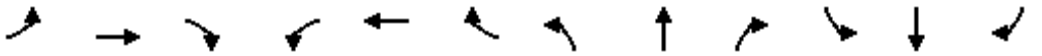
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Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	SBL	SBT	SBR
Lane Configurations											
Traffic Volume (vph)	37	1702	72	12	1782	37	26	2	5	1	20
Future Volume (vph)	37	1702	72	12	1782	37	26	2	5	1	20
Turn Type	Prot	NA	Perm	Prot	NA	Perm	Perm	NA	Perm	NA	Perm
Protected Phases	5	2		1	6			8		4	
Permitted Phases			2			6	8		4		4
Detector Phase	5	2	2	1	6	6	8	8	4	4	4
Switch Phase											
Minimum Initial (s)	5.0	10.0	10.0	5.0	10.0	10.0	10.0	10.0	10.0	10.0	10.0
Minimum Split (s)	9.6	22.8	22.8	9.6	22.8	22.8	40.6	40.6	40.6	40.6	40.6
Total Split (s)	10.0	78.0	78.0	10.0	78.0	78.0	42.0	42.0	42.0	42.0	42.0
Total Split (%)	7.7%	60.0%	60.0%	7.7%	60.0%	60.0%	32.3%	32.3%	32.3%	32.3%	32.3%
Yellow Time (s)	3.6	4.8	4.8	3.6	4.8	4.8	3.6	3.6	3.6	3.6	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.8	5.8	4.6	5.8	5.8	4.6	4.6	4.6	4.6	4.6
Lead/Lag	Lead	Lag	Lag	Lead	Lag	Lag					
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes	Yes					
Recall Mode	None	C-Max	C-Max	None	C-Max	C-Max	None	None	None	None	None
Act Effct Green (s)	6.6	102.9	102.9	5.7	96.9	96.9	20.4	20.4	20.4	20.4	20.4
Actuated g/C Ratio	0.05	0.79	0.79	0.04	0.75	0.75	0.16	0.16	0.16	0.16	0.16
v/c Ratio	0.48	0.48	0.07	0.18	0.54	0.04	0.13	0.03	0.03	0.00	0.08
Control Delay	79.4	10.9	4.8	65.4	12.6	2.2	42.7	24.3	37.6	36.0	0.6
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	79.4	10.9	4.8	65.4	12.6	2.2	42.7	24.3	37.6	36.0	0.6
LOS	E	B	A	E	B	A	D	C	D	D	A
Approach Delay		12.0			12.7			38.9		8.7	
Approach LOS		B			B			D		A	

Intersection Summary	
Cycle Length: 130	
Actuated Cycle Length: 130	
Offset: 0 (0%), Referenced to phase 2:EBT and 6:WBT, Start of Yellow	
Natural Cycle: 90	
Control Type: Actuated-Coordinated	
Maximum v/c Ratio: 0.54	
Intersection Signal Delay: 12.6	Intersection LOS: B
Intersection Capacity Utilization 68.4%	ICU Level of Service C
Analysis Period (min) 15	

Splits and Phases: 1: Douglas Dr. & Katella Av.





Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	37	1702	72	12	1782	37	26	2	5	5	1	20
Future Volume (veh/h)	37	1702	72	12	1782	37	26	2	5	5	1	20
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		0.98	1.00		0.98	0.99		0.98	1.00		0.98
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adj Flow Rate, veh/h	39	1773	67	12	1856	34	27	2	2	5	1	11
Peak Hour Factor	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	48	3802	1155	22	3727	1132	120	40	40	119	88	73
Arrive On Green	0.03	0.82	0.82	0.01	0.80	0.80	0.05	0.05	0.05	0.05	0.05	0.05
Sat Flow, veh/h	1619	4641	1410	1619	4641	1409	1267	771	771	1284	1700	1414
Grp Volume(v), veh/h	39	1773	67	12	1856	34	27	0	4	5	1	11
Grp Sat Flow(s),veh/h/ln	1619	1547	1410	1619	1547	1409	1267	0	1542	1284	1700	1414
Q Serve(g_s), s	3.1	14.5	1.2	1.0	17.1	0.6	2.7	0.0	0.3	0.5	0.1	1.0
Cycle Q Clear(g_c), s	3.1	14.5	1.2	1.0	17.1	0.6	2.8	0.0	0.3	0.8	0.1	1.0
Prop In Lane	1.00		1.00	1.00		1.00	1.00		0.50	1.00		1.00
Lane Grp Cap(c), veh/h	48	3802	1155	22	3727	1132	120	0	80	119	88	73
V/C Ratio(X)	0.81	0.47	0.06	0.55	0.50	0.03	0.22	0.00	0.05	0.04	0.01	0.15
Avail Cap(c_a), veh/h	67	3802	1155	67	3727	1132	419	0	444	422	489	407
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	62.7	3.4	2.2	63.7	4.2	2.6	59.8	0.0	58.6	59.0	58.5	58.9
Incr Delay (d2), s/veh	27.5	0.4	0.1	7.7	0.5	0.0	0.9	0.0	0.3	0.1	0.1	0.9
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.6	3.0	0.2	0.4	3.8	0.1	0.9	0.0	0.1	0.2	0.0	0.4
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	90.2	3.8	2.3	71.4	4.7	2.6	60.7	0.0	58.8	59.1	58.5	59.8
LnGrp LOS	F	A	A	E	A	A	E	A	E	E	E	E
Approach Vol, veh/h		1879			1902			31			17	
Approach Delay, s/veh		5.6			5.1			60.5			59.5	
Approach LOS		A			A			E			E	

Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	6.4	112.3		11.3	8.5	110.2		11.3				
Change Period (Y+Rc), s	4.6	5.8		4.6	4.6	5.8		4.6				
Max Green Setting (Gmax), s	5.4	72.2		37.4	5.4	72.2		37.4				
Max Q Clear Time (g_c+I1), s	3.0	16.5		3.0	5.1	19.1		4.8				
Green Ext Time (p_c), s	0.0	20.4		0.0	0.0	21.5		0.1				

Intersection Summary												
HCM 6th Ctrl Delay			6.0									
HCM 6th LOS			A									

Goodman Commerce Center (JN 15593)
E+P
AM Peak Hour

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Future Volume Alternative)

Intersection #1 Douglas Dr. & Katella Av.

Cycle (sec):	100	Critical Vol./Cap.(X):	0.448
Loss Time (sec):	5	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	22	Level Of Service:	A

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	1 0	0 1	0	1 0	1	0 1	1 0	3	0 1	1 0	3	0 1
Volume Module:												
Base Vol:	26	2	5	2	1	15	27	1702	72	12	1782	37
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	26	2	5	2	1	15	27	1702	72	12	1782	34
Added Vol:	0	0	0	3	0	5	10	0	0	0	0	3
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	26	2	5	5	1	20	37	1702	72	12	1782	37
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	26	2	5	5	1	20	37	1702	72	12	1782	37
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	26	2	5	5	1	20	37	1702	72	12	1782	37
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	26	2	5	5	1	20	37	1702	72	12	1782	37
Saturation Flow Module:												
Sat/Lane:	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	1.00	0.29	0.71	1.00	1.00	1.00	1.00	3.00	1.00	1.00	3.00	1.00
Final Sat.:	1700	486	1214	1700	1700	1700	1700	5100	1700	1700	5100	1700
Capacity Analysis Module:												
Vol/Sat:	0.02	0.00	0.00	0.00	0.00	0.01	0.02	0.33	0.04	0.01	0.35	0.02
Crit Moves:	****					****	****				****	

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Intersection	
Intersection Delay, s/veh	7.2
Intersection LOS	A

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	2	7	53	4	2	6	7	21	0	0	0
Future Vol, veh/h	0	2	7	53	4	2	6	7	21	0	0	0
Peak Hour Factor	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86
Heavy Vehicles, %	0	0	0	0	0	0	0	0	0	0	0	0
Mvmt Flow	0	2	8	62	5	2	7	8	24	0	0	0
Number of Lanes	0	1	0	0	1	0	0	1	0	0	1	0

Approach	EB	WB	NB	SB
Opposing Approach	WB	EB	SB	NB
Opposing Lanes	1	1	1	1
Conflicting Approach Left	SB	NB	EB	WB
Conflicting Lanes Left	1	1	1	1
Conflicting Approach Right	NB	SB	WB	EB
Conflicting Lanes Right	1	1	1	1
HCM Control Delay	6.6	7.5	6.9	0
HCM LOS	A	A	A	-

Lane	NBLn1	EBLn1	WBLn1	SBLn1
Vol Left, %	18%	0%	90%	0%
Vol Thru, %	21%	22%	7%	100%
Vol Right, %	62%	78%	3%	0%
Sign Control	Stop	Stop	Stop	Stop
Traffic Vol by Lane	34	9	59	0
LT Vol	6	0	53	0
Through Vol	7	2	4	0
RT Vol	21	7	2	0
Lane Flow Rate	40	10	69	0
Geometry Grp	1	1	1	1
Degree of Util (X)	0.041	0.01	0.079	0
Departure Headway (Hd)	3.701	3.553	4.136	4.067
Convergence, Y/N	Yes	Yes	Yes	Yes
Cap	964	1005	869	0
Service Time	1.738	1.581	2.149	2.11
HCM Lane V/C Ratio	0.041	0.01	0.079	0
HCM Control Delay	6.9	6.6	7.5	7.1
HCM Lane LOS	A	A	A	N
HCM 95th-tile Q	0.1	0	0.3	0

Intersection	
Int Delay, s/veh	4

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	25	0	8	109	4	20	2	77	0	0	0
Future Vol, veh/h	0	25	0	8	109	4	20	2	77	0	0	0
Conflicting Peds, #/hr	0	0	0	0	0	0	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	100	-	-	100	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	1	-	-	1	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	85	85	85	85	85	85	85	85	85	85	85	85
Heavy Vehicles, %	0	0	0	0	0	0	0	0	0	0	0	0
Mvmt Flow	0	29	0	9	128	5	24	2	91	0	0	0

Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	133	0	0	29	0	0	178	180	29	225	178	131
Stage 1	-	-	-	-	-	-	29	29	-	149	149	-
Stage 2	-	-	-	-	-	-	149	151	-	76	29	-
Critical Hdwy	4.1	-	-	4.1	-	-	7.1	6.5	6.2	7.1	6.5	6.2
Critical Hdwy Stg 1	-	-	-	-	-	-	6.1	5.5	-	6.1	5.5	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.1	5.5	-	6.1	5.5	-
Follow-up Hdwy	2.2	-	-	2.2	-	-	3.5	4	3.3	3.5	4	3.3
Pot Cap-1 Maneuver	1464	-	-	1597	-	-	789	717	1052	735	719	924
Stage 1	-	-	-	-	-	-	993	875	-	858	778	-
Stage 2	-	-	-	-	-	-	858	776	-	938	875	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	1464	-	-	1597	-	-	786	713	1052	667	715	924
Mov Cap-2 Maneuver	-	-	-	-	-	-	764	690	-	693	691	-
Stage 1	-	-	-	-	-	-	993	875	-	858	773	-
Stage 2	-	-	-	-	-	-	853	771	-	855	875	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	0	0.5	9.2	0
HCM LOS			A	A

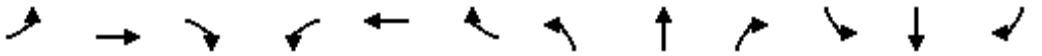
Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1
Capacity (veh/h)	968	1464	-	-	1597	-	-	-
HCM Lane V/C Ratio	0.12	-	-	-	0.006	-	-	-
HCM Control Delay (s)	9.2	0	-	-	7.3	-	-	0
HCM Lane LOS	A	A	-	-	A	-	-	A
HCM 95th %tile Q(veh)	0.4	0	-	-	0	-	-	-

Lane Group	EBL	EBT	WBL	WBT	NBL	NBT	SBL	SBT
Lane Configurations								
Traffic Volume (vph)	11	9	12	0	22	1516	254	1551
Future Volume (vph)	11	9	12	0	22	1516	254	1551
Turn Type	Perm	NA	Perm	NA	Prot	NA	Prot	NA
Protected Phases		4		8	5	2	1	6
Permitted Phases	4		8					
Detector Phase	4	4	8	8	5	2	1	6
Switch Phase								
Minimum Initial (s)	10.0	10.0	10.0	10.0	5.0	10.0	5.0	10.0
Minimum Split (s)	37.6	37.6	14.6	14.6	9.6	22.8	9.6	22.8
Total Split (s)	38.0	38.0	38.0	38.0	11.0	61.0	31.0	81.0
Total Split (%)	29.2%	29.2%	29.2%	29.2%	8.5%	46.9%	23.8%	62.3%
Yellow Time (s)	3.6	3.6	3.6	3.6	3.6	4.8	3.6	4.8
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	4.6	4.6	4.6	4.6	5.8	4.6	5.8
Lead/Lag					Lead	Lag	Lead	Lag
Lead-Lag Optimize?					Yes	Yes	Yes	Yes
Recall Mode	None	None	None	None	None	C-Max	None	C-Max
Act Effct Green (s)	19.2	19.2	19.2	19.2	6.0	75.0	23.7	97.8
Actuated g/C Ratio	0.15	0.15	0.15	0.15	0.05	0.58	0.18	0.75
v/c Ratio	0.06	0.10	0.06	0.08	0.30	0.65	0.87	0.50
Control Delay	41.4	23.4	41.4	0.3	70.0	23.8	79.8	10.9
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	41.4	23.4	41.4	0.3	70.0	23.8	79.8	10.9
LOS	D	C	D	A	E	C	E	B
Approach Delay		29.0		10.0		24.4		19.9
Approach LOS		C		A		C		B

Intersection Summary	
Cycle Length: 130	
Actuated Cycle Length: 130	
Offset: 0 (0%), Referenced to phase 2:NBT and 6:SBT, Start of Yellow	
Natural Cycle: 100	
Control Type: Actuated-Coordinated	
Maximum v/c Ratio: 0.87	
Intersection Signal Delay: 21.9	Intersection LOS: C
Intersection Capacity Utilization 75.7%	ICU Level of Service D
Analysis Period (min) 15	

Splits and Phases: 4: Valley View St. & Plaza Dr./Chip Av.





Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	11	9	15	12	0	39	22	1516	181	254	1551	159
Future Volume (veh/h)	11	9	15	12	0	39	22	1516	181	254	1551	159
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		0.99	0.99		1.00	1.00		0.98	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adj Flow Rate, veh/h	11	9	10	12	0	33	22	1531	181	257	1567	158
Peak Hour Factor	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	105	45	50	118	0	89	34	2728	322	279	3435	346
Arrive On Green	0.06	0.06	0.06	0.06	0.00	0.06	0.02	0.65	0.65	0.17	0.80	0.80
Sat Flow, veh/h	1251	731	812	1250	0	1441	1619	4195	495	1619	4284	431
Grp Volume(v), veh/h	11	0	19	12	0	33	22	1129	583	257	1131	594
Grp Sat Flow(s),veh/h/ln	1251	0	1543	1250	0	1441	1619	1547	1597	1619	1547	1622
Q Serve(g_s), s	1.1	0.0	1.5	1.2	0.0	2.9	1.8	26.1	26.2	20.3	14.9	14.9
Cycle Q Clear(g_c), s	4.0	0.0	1.5	2.7	0.0	2.9	1.8	26.1	26.2	20.3	14.9	14.9
Prop In Lane	1.00		0.53	1.00		1.00	1.00		0.31	1.00		0.27
Lane Grp Cap(c), veh/h	105	0	95	118	0	89	34	2012	1038	279	2481	1300
V/C Ratio(X)	0.10	0.00	0.20	0.10	0.00	0.37	0.64	0.56	0.56	0.92	0.46	0.46
Avail Cap(c_a), veh/h	349	0	396	362	0	370	80	2012	1038	329	2481	1300
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	60.5	0.0	57.9	59.2	0.0	58.6	63.1	12.5	12.5	52.9	4.0	4.0
Incr Delay (d2), s/veh	0.4	0.0	1.0	0.4	0.0	2.5	7.3	1.1	2.2	25.8	0.6	1.2
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.4	0.0	0.6	0.4	0.0	1.1	0.8	8.4	9.0	10.0	3.4	3.8
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	60.9	0.0	58.9	59.6	0.0	61.1	70.5	13.7	14.7	78.7	4.6	5.2
LnGrp LOS	E	A	E	E	A	E	E	B	B	E	A	A
Approach Vol, veh/h		30			45			1734			1982	
Approach Delay, s/veh		59.7			60.7			14.7			14.4	
Approach LOS		E			E			B			B	

Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	27.0	90.3		12.6	7.3	110.0		12.6				
Change Period (Y+Rc), s	4.6	5.8		4.6	4.6	5.8		4.6				
Max Green Setting (Gmax), s	26.4	55.2		33.4	6.4	75.2		33.4				
Max Q Clear Time (g_c+I1), s	22.3	28.2		6.0	3.8	16.9		4.9				
Green Ext Time (p_c), s	0.1	13.4		0.1	0.0	17.7		0.2				

Intersection Summary			
HCM 6th Ctrl Delay		15.5	
HCM 6th LOS		B	

Goodman Commerce Center (JN 15593)
E+P
AM Peak Hour

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Future Volume Alternative)

Intersection #4 Valley View St. & Plaza Dr.

Cycle (sec):	100	Critical Vol./Cap.(X):	0.562
Loss Time (sec):	5	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	27	Level Of Service:	A

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Protected			Protected			Permitted			Permitted		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	1 0	2 1	0	1 0	2 1	0	1 0	0 1	0	1 0	0 1	0
Volume Module:												
Base Vol:	22	1516	181	254	1551	154	9	9	15	12	0	39
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	22	1516	181	254	1551	154	9	9	15	12	0	39
Added Vol:	0	0	0	0	0	5	2	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	22	1516	181	254	1551	159	11	9	15	12	0	39
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	22	1516	181	254	1551	159	11	9	15	12	0	39
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	22	1516	181	254	1551	159	11	9	15	12	0	39
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	22	1516	181	254	1551	159	11	9	15	12	0	39
Saturation Flow Module:												
Sat/Lane:	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	1.00	2.68	0.32	1.00	2.72	0.28	1.00	0.38	0.62	1.00	0.00	1.00
Final Sat.:	1700	4556	544	1700	4626	474	1700	638	1063	1700	0	1700
Capacity Analysis Module:												
Vol/Sat:	0.01	0.33	0.33	0.15	0.34	0.34	0.01	0.01	0.01	0.01	0.00	0.02
Crit Moves:		****			****			****				****

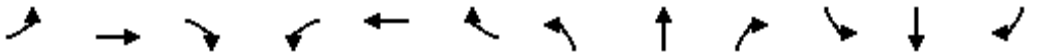
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Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	SBL	SBT	SBR
Lane Configurations											
Traffic Volume (vph)	17	1963	32	9	1608	9	83	1	30	2	58
Future Volume (vph)	17	1963	32	9	1608	9	83	1	30	2	58
Turn Type	Prot	NA	Perm	Prot	NA	Perm	Perm	NA	Perm	NA	Perm
Protected Phases	5	2		1	6			8		4	
Permitted Phases			2			6	8		4		4
Detector Phase	5	2	2	1	6	6	8	8	4	4	4
Switch Phase											
Minimum Initial (s)	5.0	10.0	10.0	5.0	10.0	10.0	10.0	10.0	10.0	10.0	10.0
Minimum Split (s)	9.6	22.8	22.8	9.6	22.8	22.8	40.6	40.6	40.6	40.6	40.6
Total Split (s)	10.0	78.0	78.0	10.0	78.0	78.0	42.0	42.0	42.0	42.0	42.0
Total Split (%)	7.7%	60.0%	60.0%	7.7%	60.0%	60.0%	32.3%	32.3%	32.3%	32.3%	32.3%
Yellow Time (s)	3.6	4.8	4.8	3.6	4.8	4.8	3.6	3.6	3.6	3.6	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.8	5.8	4.6	5.8	5.8	4.6	4.6	4.6	4.6	4.6
Lead/Lag	Lead	Lag	Lag	Lead	Lag	Lag					
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes	Yes					
Recall Mode	None	C-Max	C-Max	None	C-Max	C-Max	None	None	None	None	None
Act Effct Green (s)	5.9	95.6	95.6	5.6	93.3	93.3	21.8	21.8	21.8	21.8	21.8
Actuated g/C Ratio	0.05	0.74	0.74	0.04	0.72	0.72	0.17	0.17	0.17	0.17	0.17
v/c Ratio	0.26	0.65	0.03	0.14	0.54	0.01	0.43	0.04	0.16	0.01	0.22
Control Delay	68.3	13.0	1.8	64.1	12.5	0.0	51.5	19.6	42.5	36.0	10.0
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	68.3	13.0	1.8	64.1	12.5	0.0	51.5	19.6	42.5	36.0	10.0
LOS	E	B	A	E	B	A	D	B	D	D	A
Approach Delay		13.3			12.7			48.7		21.4	
Approach LOS		B			B			D		C	

Intersection Summary	
Cycle Length: 130	
Actuated Cycle Length: 130	
Offset: 0 (0%), Referenced to phase 2:EBT and 6:WBT, Start of Yellow	
Natural Cycle: 100	
Control Type: Actuated-Coordinated	
Maximum v/c Ratio: 0.65	
Intersection Signal Delay: 14.1	Intersection LOS: B
Intersection Capacity Utilization 63.9%	ICU Level of Service B
Analysis Period (min) 15	

Splits and Phases: 1: Douglas Dr. & Katella Av.





Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	17	1963	32	9	1608	9	83	1	7	30	2	58
Future Volume (veh/h)	17	1963	32	9	1608	9	83	1	7	30	2	58
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		0.98	1.00		0.98	1.00		1.00	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adj Flow Rate, veh/h	19	2206	30	10	1807	10	93	1	4	34	2	31
Peak Hour Factor	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	31	3637	1104	19	3602	1095	166	27	106	166	152	127
Arrive On Green	0.02	0.78	0.78	0.01	0.78	0.78	0.09	0.09	0.09	0.09	0.09	0.09
Sat Flow, veh/h	1619	4641	1409	1619	4641	1410	1251	297	1189	1283	1700	1420
Grp Volume(v), veh/h	19	2206	30	10	1807	10	93	0	5	34	2	31
Grp Sat Flow(s),veh/h/ln	1619	1547	1409	1619	1547	1410	1251	0	1486	1283	1700	1420
Q Serve(g_s), s	1.5	25.5	0.6	0.8	18.5	0.2	9.5	0.0	0.4	3.2	0.1	2.6
Cycle Q Clear(g_c), s	1.5	25.5	0.6	0.8	18.5	0.2	9.7	0.0	0.4	3.6	0.1	2.6
Prop In Lane	1.00		1.00	1.00		1.00	1.00		0.80	1.00		1.00
Lane Grp Cap(c), veh/h	31	3637	1104	19	3602	1095	166	0	133	166	152	127
V/C Ratio(X)	0.61	0.61	0.03	0.53	0.50	0.01	0.56	0.00	0.04	0.20	0.01	0.24
Avail Cap(c_a), veh/h	67	3637	1104	67	3602	1095	414	0	428	420	489	408
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	63.3	5.8	3.1	63.9	5.3	3.3	58.4	0.0	54.1	55.8	54.0	55.1
Incr Delay (d2), s/veh	7.2	0.8	0.0	8.3	0.5	0.0	3.0	0.0	0.1	0.6	0.0	1.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.7	6.2	0.1	0.4	4.6	0.1	3.2	0.0	0.2	1.1	0.1	1.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	70.4	6.6	3.2	72.2	5.8	3.3	61.3	0.0	54.2	56.4	54.0	56.1
LnGrp LOS	E	A	A	E	A	A	E	A	D	E	D	E
Approach Vol, veh/h		2255			1827			98			67	
Approach Delay, s/veh		7.1			6.2			61.0			56.2	
Approach LOS		A			A			E			E	

Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	6.1	107.7		16.2	7.1	106.7		16.2				
Change Period (Y+Rc), s	4.6	5.8		4.6	4.6	5.8		4.6				
Max Green Setting (Gmax), s	5.4	72.2		37.4	5.4	72.2		37.4				
Max Q Clear Time (g_c+I1), s	2.8	27.5		5.6	3.5	20.5		11.7				
Green Ext Time (p_c), s	0.0	26.4		0.2	0.0	20.1		0.3				

Intersection Summary		
HCM 6th Ctrl Delay		8.7
HCM 6th LOS		A

Goodman Commerce Center (JN 15593)
E+P
PM Peak Hour

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Future Volume Alternative)

Intersection #1 Douglas Dr. & Katella Av.

Cycle (sec):	100	Critical Vol./Cap.(X):	0.523
Loss Time (sec):	5	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	25	Level Of Service:	A

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	1 0	0 1	0	1 0	1 0	1	1 0	3 0	1	1 0	3 0	1
Volume Module:												
Base Vol:	83	1	7	26	2	47	11	1963	32	9	1608	6
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	83	1	7	26	2	47	11	1963	32	9	1608	6
Added Vol:	0	0	0	4	0	11	6	0	0	0	0	3
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	83	1	7	30	2	58	17	1963	32	9	1608	9
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	83	1	7	30	2	58	17	1963	32	9	1608	9
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	83	1	7	30	2	58	17	1963	32	9	1608	9
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	83	1	7	30	2	58	17	1963	32	9	1608	9
Saturation Flow Module:												
Sat/Lane:	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	1.00	0.12	0.88	1.00	1.00	1.00	1.00	3.00	1.00	1.00	3.00	1.00
Final Sat.:	1700	213	1488	1700	1700	1700	1700	5100	1700	1700	5100	1700
Capacity Analysis Module:												
Vol/Sat:	0.05	0.00	0.00	0.02	0.00	0.03	0.01	0.38	0.02	0.01	0.32	0.01
Crit Moves:	****					****		****		****		

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Intersection	
Intersection Delay, s/veh	7.7
Intersection LOS	A

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	4	8	100	2	1	6	2	24	2	6	0
Future Vol, veh/h	0	4	8	100	2	1	6	2	24	2	6	0
Peak Hour Factor	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75
Heavy Vehicles, %	0	0	0	0	0	0	0	0	0	0	0	0
Mvmt Flow	0	5	11	133	3	1	8	3	32	3	8	0
Number of Lanes	0	1	0	0	1	0	0	1	0	0	1	0

Approach	EB	WB	NB	SB
Opposing Approach	WB	EB	SB	NB
Opposing Lanes	1	1	1	1
Conflicting Approach Left	SB	NB	EB	WB
Conflicting Lanes Left	1	1	1	1
Conflicting Approach Right	NB	SB	WB	EB
Conflicting Lanes Right	1	1	1	1
HCM Control Delay	6.8	8	7	7.4
HCM LOS	A	A	A	A

Lane	NBLn1	EBLn1	WBLn1	SBLn1
Vol Left, %	19%	0%	97%	25%
Vol Thru, %	6%	33%	2%	75%
Vol Right, %	75%	67%	1%	0%
Sign Control	Stop	Stop	Stop	Stop
Traffic Vol by Lane	32	12	103	8
LT Vol	6	0	100	2
Through Vol	2	4	2	6
RT Vol	24	8	1	0
Lane Flow Rate	43	16	137	11
Geometry Grp	1	1	1	1
Degree of Util (X)	0.045	0.016	0.16	0.013
Departure Headway (Hd)	3.76	3.695	4.192	4.249
Convergence, Y/N	Yes	Yes	Yes	Yes
Cap	938	960	856	831
Service Time	1.841	1.75	2.216	2.334
HCM Lane V/C Ratio	0.046	0.017	0.16	0.013
HCM Control Delay	7	6.8	8	7.4
HCM Lane LOS	A	A	A	A
HCM 95th-tile Q	0.1	0	0.6	0

Intersection	
Int Delay, s/veh	1.2

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	92	3	11	83	0	5	0	9	0	3	0
Future Vol, veh/h	0	92	3	11	83	0	5	0	9	0	3	0
Conflicting Peds, #/hr	0	0	0	0	0	0	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	100	-	-	100	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	1	-	-	1	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	63	63	63	63	63	63	63	63	63	63	63	63
Heavy Vehicles, %	0	0	0	0	0	0	0	0	0	0	0	0
Mvmt Flow	0	146	5	17	132	0	8	0	14	0	5	0

Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	132	0	0	151	0	0	318	315	149	322	317	132
Stage 1	-	-	-	-	-	-	149	149	-	166	166	-
Stage 2	-	-	-	-	-	-	169	166	-	156	151	-
Critical Hdwy	4.1	-	-	4.1	-	-	7.1	6.5	6.2	7.1	6.5	6.2
Critical Hdwy Stg 1	-	-	-	-	-	-	6.1	5.5	-	6.1	5.5	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.1	5.5	-	6.1	5.5	-
Follow-up Hdwy	2.2	-	-	2.2	-	-	3.5	4	3.3	3.5	4	3.3
Pot Cap-1 Maneuver	1466	-	-	1442	-	-	639	604	903	635	602	923
Stage 1	-	-	-	-	-	-	858	778	-	841	765	-
Stage 2	-	-	-	-	-	-	838	765	-	851	776	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	1466	-	-	1442	-	-	629	597	903	619	595	923
Mov Cap-2 Maneuver	-	-	-	-	-	-	670	622	-	662	617	-
Stage 1	-	-	-	-	-	-	858	778	-	841	756	-
Stage 2	-	-	-	-	-	-	823	756	-	838	776	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	0	0.9	9.6	10.9
HCM LOS			A	B

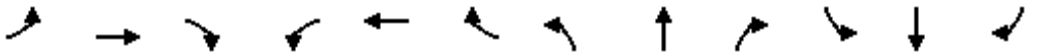
Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1
Capacity (veh/h)	803	1466	-	-	1442	-	-	617
HCM Lane V/C Ratio	0.028	-	-	-	0.012	-	-	0.008
HCM Control Delay (s)	9.6	0	-	-	7.5	-	-	10.9
HCM Lane LOS	A	A	-	-	A	-	-	B
HCM 95th %tile Q(veh)	0.1	0	-	-	0	-	-	0

Lane Group	EBL	EBT	WBL	WBT	NBL	NBT	SBL	SBT
Lane Configurations								
Traffic Volume (vph)	174	0	162	30	4	1967	52	1503
Future Volume (vph)	174	0	162	30	4	1967	52	1503
Turn Type	Perm	NA	Perm	NA	Prot	NA	Prot	NA
Protected Phases		4		8	5	2	1	6
Permitted Phases	4		8					
Detector Phase	4	4	8	8	5	2	1	6
Switch Phase								
Minimum Initial (s)	10.0	10.0	10.0	10.0	5.0	10.0	5.0	10.0
Minimum Split (s)	37.6	37.6	14.6	14.6	9.6	22.8	9.6	22.8
Total Split (s)	50.0	50.0	50.0	50.0	11.0	69.0	11.0	69.0
Total Split (%)	38.5%	38.5%	38.5%	38.5%	8.5%	53.1%	8.5%	53.1%
Yellow Time (s)	3.6	3.6	3.6	3.6	3.6	4.8	3.6	4.8
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	4.6	4.6	4.6	4.6	5.8	4.6	5.8
Lead/Lag					Lead	Lag	Lead	Lag
Lead-Lag Optimize?					Yes	Yes	Yes	Yes
Recall Mode	None	None	None	None	None	C-Max	None	C-Max
Act Effct Green (s)	45.4	45.4	45.4	45.4	5.2	65.4	6.2	72.1
Actuated g/C Ratio	0.35	0.35	0.35	0.35	0.04	0.50	0.05	0.55
v/c Ratio	1.02	0.11	0.40	0.69	0.06	0.88	0.71	0.62
Control Delay	116.2	0.9	35.5	33.8	62.0	35.2	104.3	21.5
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	116.2	0.9	35.5	33.8	62.0	35.2	104.3	21.5
LOS	F	A	D	C	E	D	F	C
Approach Delay		86.1		34.3		35.2		24.2
Approach LOS		F		C		D		C

Intersection Summary	
Cycle Length: 130	
Actuated Cycle Length: 130	
Offset: 0 (0%), Referenced to phase 2:NBT and 6:SBT, Start of Yellow	
Natural Cycle: 100	
Control Type: Actuated-Coordinated	
Maximum v/c Ratio: 1.02	
Intersection Signal Delay: 33.8	Intersection LOS: C
Intersection Capacity Utilization 97.9%	ICU Level of Service F
Analysis Period (min) 15	

Splits and Phases: 4: Valley View St. & Plaza Dr./Chip Av.





Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	174	0	61	162	30	355	4	1967	12	52	1503	26
Future Volume (veh/h)	174	0	61	162	30	355	4	1967	12	52	1503	26
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		0.98	1.00		0.97
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adj Flow Rate, veh/h	181	0	44	169	31	311	4	2049	12	54	1566	24
Peak Hour Factor	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	197	0	503	462	46	464	8	2351	14	67	2495	38
Arrive On Green	0.35	0.00	0.35	0.35	0.35	0.35	0.01	0.49	0.49	0.04	0.53	0.53
Sat Flow, veh/h	944	0	1439	1237	132	1328	1619	4760	28	1619	4707	72
Grp Volume(v), veh/h	181	0	44	169	0	342	4	1331	730	54	1029	561
Grp Sat Flow(s),veh/h/ln	944	0	1439	1237	0	1461	1619	1547	1694	1619	1547	1685
Q Serve(g_s), s	19.5	0.0	2.7	13.8	0.0	25.9	0.3	49.7	49.8	4.3	30.5	30.5
Cycle Q Clear(g_c), s	45.4	0.0	2.7	16.5	0.0	25.9	0.3	49.7	49.8	4.3	30.5	30.5
Prop In Lane	1.00		1.00	1.00		0.91	1.00		0.02	1.00		0.04
Lane Grp Cap(c), veh/h	197	0	503	462	0	510	8	1528	837	67	1640	893
V/C Ratio(X)	0.92	0.00	0.09	0.37	0.00	0.67	0.48	0.87	0.87	0.80	0.63	0.63
Avail Cap(c_a), veh/h	197	0	503	462	0	510	80	1528	837	80	1640	893
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	57.3	0.0	28.4	33.9	0.0	35.9	64.5	29.2	29.2	61.8	21.5	21.5
Incr Delay (d2), s/veh	41.6	0.0	0.1	0.5	0.0	3.4	14.8	7.1	12.1	32.4	1.8	3.3
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	8.3	0.0	1.0	4.3	0.0	9.8	0.2	18.7	21.7	2.3	10.7	12.1
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	99.0	0.0	28.5	34.4	0.0	39.3	79.3	36.3	41.4	94.2	23.3	24.8
LnGrp LOS	F	A	C	C	A	D	E	D	D	F	C	C
Approach Vol, veh/h		225			511			2065			1644	
Approach Delay, s/veh		85.2			37.7			38.2			26.2	
Approach LOS		F			D			D			C	

Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	10.0	70.0		50.0	5.3	74.7		50.0				
Change Period (Y+Rc), s	4.6	5.8		4.6	4.6	5.8		4.6				
Max Green Setting (Gmax), s	6.4	63.2		45.4	6.4	63.2		45.4				
Max Q Clear Time (g_c+I1), s	6.3	51.8		47.4	2.3	32.5		27.9				
Green Ext Time (p_c), s	0.0	8.8		0.0	0.0	12.7		2.8				

Intersection Summary												
HCM 6th Ctrl Delay			36.1									
HCM 6th LOS			D									

Goodman Commerce Center (JN 15593)
E+P
PM Peak Hour

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Future Volume Alternative)

Intersection #4 Valley View St. & Plaza Dr.

Cycle (sec):	100	Critical Vol./Cap.(X):	0.797
Loss Time (sec):	5	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	51	Level Of Service:	C

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Protected			Protected			Permitted			Permitted		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	1 0	2 1	0	1 0	2 1	0	1 0	0 1	0	1 0	0 1	0
Volume Module:												
Base Vol:	4	1967	12	52	1503	23	168	0	61	162	30	355
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	4	1967	12	52	1503	23	168	0	61	162	30	355
Added Vol:	0	0	0	0	0	3	6	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	4	1967	12	52	1503	26	174	0	61	162	30	355
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	4	1967	12	52	1503	26	174	0	61	162	30	355
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	4	1967	12	52	1503	26	174	0	61	162	30	355
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	4	1967	12	52	1503	26	174	0	61	162	30	355
Saturation Flow Module:												
Sat/Lane:	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	1.00	2.98	0.02	1.00	2.95	0.05	1.00	0.00	1.00	1.00	0.08	0.92
Final Sat.:	1700	5069	31	1700	5013	87	1700	0	1700	1700	132	1568
Capacity Analysis Module:												
Vol/Sat:	0.00	0.39	0.39	0.03	0.30	0.30	0.10	0.00	0.04	0.10	0.23	0.23
Crit Moves:		****			****			****			****	

Traffix 8.0.0715 (c) 2008 Dowling Assoc. Licensed to URBAN CROSSROADS, IRVINE

APPENDIX 5.2: EXISTING PLUS PROJECT CONDITIONS TRAFFIC SIGNAL WARRANT ANALYSIS WORKSHEETS

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Figure 4C-3. Warrant 3, Peak Hour

Traffic Conditions = **E+P Conditions - Weekday AM Peak Hour**

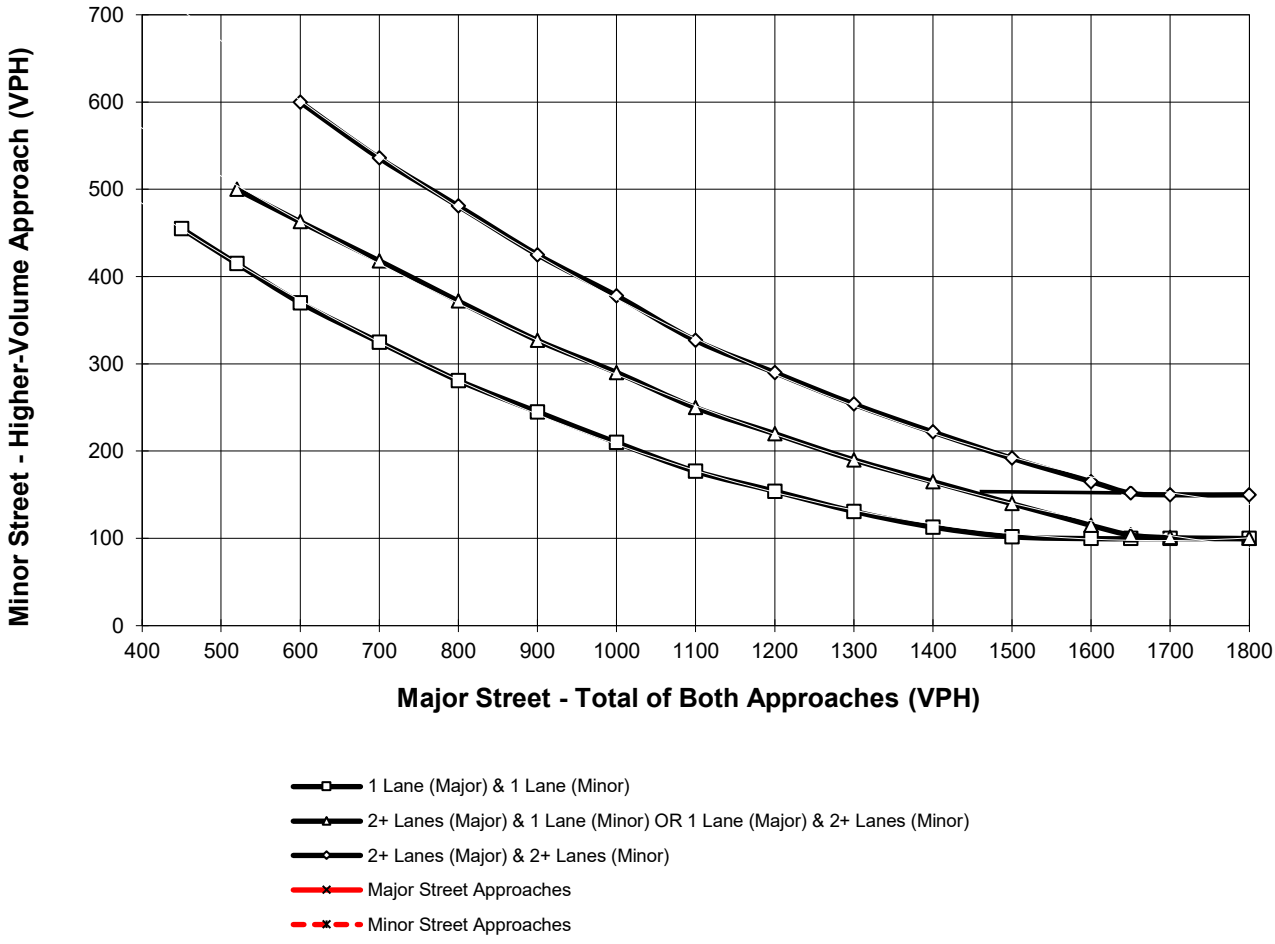
Major Street Name = **Plaza Dr.**

Total of Both Approaches (VPH) = **68**
Number of Approach Lanes on Major Street = **1**

Minor Street Name = **Douglas Dr.**

High Volume Approach (VPH) = **34**
Number of Approach Lanes On Minor Street = **1**

SIGNAL WARRANT NOT SATISFIED



*Note: 150 vph applies as the lower threshold for a minor-street approach with two or more lanes and 100 vph applies as the lower threshold for a minor-street approach with one lane

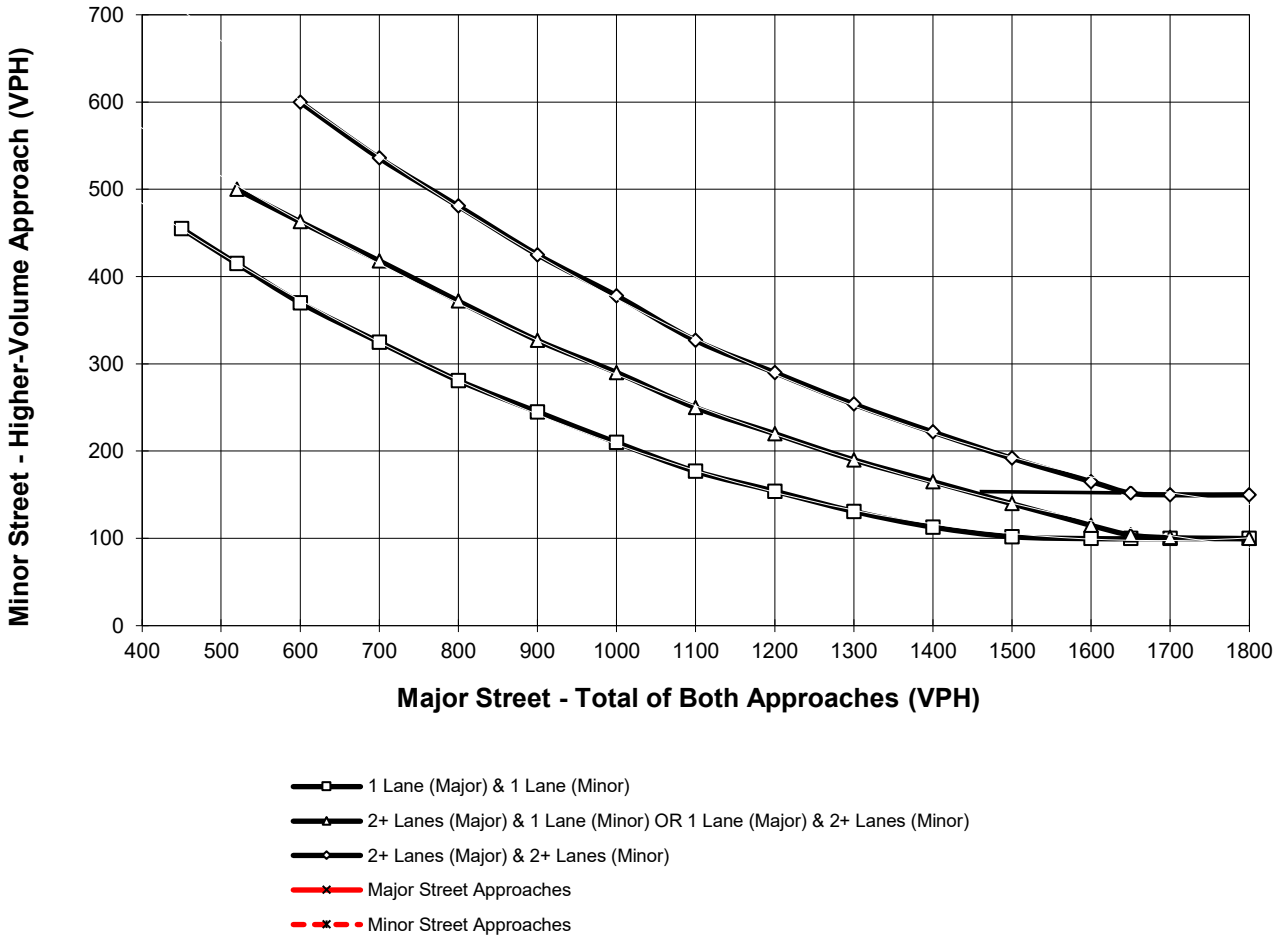
Figure 4C-3. Warrant 3, Peak Hour

Traffic Conditions = **E+P Conditions - Weekday PM Peak Hour**

Major Street Name = **Plaza Dr.**
Total of Both Approaches (VPH) = **189**
Number of Approach Lanes on Major Street = **1**

Minor Street Name = **McDonnell Dr.**
High Volume Approach (VPH) = **14**
Number of Approach Lanes On Minor Street = **1**

SIGNAL WARRANT NOT SATISFIED



*Note: 150 vph applies as the lower threshold for a minor-street approach with two or more lanes and 100 vph applies as the lower threshold for a minor-street approach with one lane

APPENDIX 6.1: FUTURE YEAR (2025) WITHOUT PROJECT CONDITIONS INTERSECTION OPERATIONS ANALYSIS WORKSHEETS

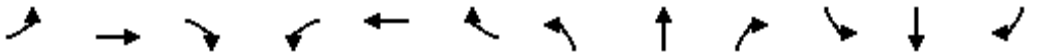
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Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	SBL	SBT	SBR
Lane Configurations											
Traffic Volume (vph)	49	1828	74	12	1886	35	27	2	2	1	22
Future Volume (vph)	49	1828	74	12	1886	35	27	2	2	1	22
Turn Type	Prot	NA	Perm	Prot	NA	Perm	Perm	NA	Perm	NA	Perm
Protected Phases	5	2		1	6			8		4	
Permitted Phases			2			6	8		4		4
Detector Phase	5	2	2	1	6	6	8	8	4	4	4
Switch Phase											
Minimum Initial (s)	5.0	10.0	10.0	5.0	10.0	10.0	10.0	10.0	10.0	10.0	10.0
Minimum Split (s)	9.6	22.8	22.8	9.6	22.8	22.8	40.6	40.6	40.6	40.6	40.6
Total Split (s)	10.0	78.0	78.0	10.0	78.0	78.0	42.0	42.0	42.0	42.0	42.0
Total Split (%)	7.7%	60.0%	60.0%	7.7%	60.0%	60.0%	32.3%	32.3%	32.3%	32.3%	32.3%
Yellow Time (s)	3.6	4.8	4.8	3.6	4.8	4.8	3.6	3.6	3.6	3.6	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.8	5.8	4.6	5.8	5.8	4.6	4.6	4.6	4.6	4.6
Lead/Lag	Lead	Lag	Lag	Lead	Lag	Lag					
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes	Yes					
Recall Mode	None	C-Max	C-Max	None	C-Max	C-Max	None	None	None	None	None
Act Effct Green (s)	7.3	102.9	102.9	5.7	96.3	96.3	20.4	20.4	20.4	20.4	20.4
Actuated g/C Ratio	0.06	0.79	0.79	0.04	0.74	0.74	0.16	0.16	0.16	0.16	0.16
v/c Ratio	0.56	0.52	0.07	0.18	0.57	0.03	0.14	0.03	0.01	0.00	0.08
Control Delay	82.9	11.5	4.9	65.4	13.4	1.8	42.7	24.3	36.5	36.0	0.6
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	82.9	11.5	4.9	65.4	13.4	1.8	42.7	24.3	36.5	36.0	0.6
LOS	F	B	A	E	B	A	D	C	D	D	A
Approach Delay		13.0			13.5			39.0		4.7	
Approach LOS		B			B			D		A	

Intersection Summary	
Cycle Length: 130	
Actuated Cycle Length: 130	
Offset: 0 (0%), Referenced to phase 2:EBT and 6:WBT, Start of Yellow	
Natural Cycle: 90	
Control Type: Actuated-Coordinated	
Maximum v/c Ratio: 0.57	
Intersection Signal Delay: 13.4	Intersection LOS: B
Intersection Capacity Utilization 70.6%	ICU Level of Service C
Analysis Period (min) 15	

Splits and Phases: 1: Douglas Dr. & Katella Av.





Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	49	1828	74	12	1886	35	27	2	5	2	1	22
Future Volume (veh/h)	49	1828	74	12	1886	35	27	2	5	2	1	22
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		0.98	1.00		0.98	0.99		0.98	1.00		0.98
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adj Flow Rate, veh/h	51	1904	69	12	1965	31	28	2	2	2	1	13
Peak Hour Factor	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	64	3798	1154	22	3679	1117	121	41	41	120	90	75
Arrive On Green	0.04	0.82	0.82	0.01	0.79	0.79	0.05	0.05	0.05	0.05	0.05	0.05
Sat Flow, veh/h	1619	4641	1410	1619	4641	1409	1265	771	771	1284	1700	1414
Grp Volume(v), veh/h	51	1904	69	12	1965	31	28	0	4	2	1	13
Grp Sat Flow(s),veh/h/ln	1619	1547	1410	1619	1547	1409	1265	0	1542	1284	1700	1414
Q Serve(g_s), s	4.1	16.4	1.2	1.0	19.8	0.6	2.8	0.0	0.3	0.2	0.1	1.1
Cycle Q Clear(g_c), s	4.1	16.4	1.2	1.0	19.8	0.6	2.9	0.0	0.3	0.5	0.1	1.1
Prop In Lane	1.00		1.00	1.00		1.00	1.00		0.50	1.00		1.00
Lane Grp Cap(c), veh/h	64	3798	1154	22	3679	1117	121	0	81	120	90	75
V/C Ratio(X)	0.80	0.50	0.06	0.55	0.53	0.03	0.23	0.00	0.05	0.02	0.01	0.17
Avail Cap(c_a), veh/h	67	3798	1154	67	3679	1117	419	0	444	422	489	407
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	62.0	3.6	2.3	63.7	4.8	2.9	59.7	0.0	58.5	58.7	58.4	58.9
Incr Delay (d2), s/veh	43.1	0.5	0.1	7.7	0.6	0.0	1.0	0.0	0.2	0.1	0.0	1.1
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.4	3.4	0.2	0.4	4.6	0.1	0.9	0.0	0.1	0.1	0.0	0.4
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	105.1	4.1	2.4	71.4	5.4	2.9	60.7	0.0	58.7	58.8	58.4	60.0
LnGrp LOS	F	A	A	E	A	A	E	A	E	E	E	E
Approach Vol, veh/h		2024			2008			32			16	
Approach Delay, s/veh		6.6			5.8			60.4			59.7	
Approach LOS		A			A			E			E	

Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	6.4	112.2		11.5	9.7	108.8		11.5				
Change Period (Y+Rc), s	4.6	5.8		4.6	4.6	5.8		4.6				
Max Green Setting (Gmax), s	5.4	72.2		37.4	5.4	72.2		37.4				
Max Q Clear Time (g_c+I1), s	3.0	18.4		3.1	6.1	21.8		4.9				
Green Ext Time (p_c), s	0.0	22.9		0.0	0.0	23.3		0.1				

Intersection Summary		
HCM 6th Ctrl Delay		6.8
HCM 6th LOS		A

Goodman Commerce Center (JN 15593)
Opening Year (2025) Without Project
AM Peak Hour

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Future Volume Alternative)

Intersection #1 Douglas Dr. & Katella Av.

Cycle (sec):	100	Critical Vol./Cap.(X):	0.477
Loss Time (sec):	5	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	23	Level Of Service:	A

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	1 0	0 1	0	1 0	1 0	1	1 0	3 0	1	1 0	3 0	1
Volume Module:												
Base Vol:	27	2	5	2	1	22	49	1828	74	12	1886	35
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	27	2	5	2	1	22	49	1828	74	12	1886	35
Added Vol:	0	0	0	0	0	0	0	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	27	2	5	2	1	22	49	1828	74	12	1886	35
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	27	2	5	2	1	22	49	1828	74	12	1886	35
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	27	2	5	2	1	22	49	1828	74	12	1886	35
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	27	2	5	2	1	22	49	1828	74	12	1886	35
Saturation Flow Module:												
Sat/Lane:	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	1.00	0.29	0.71	1.00	1.00	1.00	1.00	3.00	1.00	1.00	3.00	1.00
Final Sat.:	1700	486	1214	1700	1700	1700	1700	5100	1700	1700	5100	1700
Capacity Analysis Module:												
Vol/Sat:	0.02	0.00	0.00	0.00	0.00	0.01	0.03	0.36	0.04	0.01	0.37	0.02
Crit Moves:	****					****	****				****	

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Intersection	
Intersection Delay, s/veh	7.2
Intersection LOS	A

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	0	0	62	0	3	0	4	39	0	0	0
Future Vol, veh/h	0	0	0	62	0	3	0	4	39	0	0	0
Peak Hour Factor	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86
Heavy Vehicles, %	0	0	0	0	0	0	0	0	0	0	0	0
Mvmt Flow	0	0	0	72	0	3	0	5	45	0	0	0
Number of Lanes	0	0	0	1	0	0	0	0	1	0	0	0

Approach	WB	NB
Opposing Approach		
Opposing Lanes	0	0
Conflicting Approach Left	NB	
Conflicting Lanes Left	1	0
Conflicting Approach Right		WB
Conflicting Lanes Right	0	1
HCM Control Delay	7.6	6.7
HCM LOS	A	A

Lane	NBLn1	WBLn1
Vol Left, %	0%	95%
Vol Thru, %	9%	0%
Vol Right, %	91%	5%
Sign Control	Stop	Stop
Traffic Vol by Lane	43	65
LT Vol	0	62
Through Vol	4	0
RT Vol	39	3
Lane Flow Rate	50	76
Geometry Grp	1	1
Degree of Util (X)	0.048	0.087
Departure Headway (Hd)	3.487	4.15
Convergence, Y/N	Yes	Yes
Cap	1022	867
Service Time	1.526	2.158
HCM Lane V/C Ratio	0.049	0.088
HCM Control Delay	6.7	7.6
HCM Lane LOS	A	A
HCM 95th-tile Q	0.2	0.3

Intersection	
Int Delay, s/veh	4.3

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	46	0	14	122	10	20	3	115	1	0	0
Future Vol, veh/h	0	46	0	14	122	10	20	3	115	1	0	0
Conflicting Peds, #/hr	0	0	0	0	0	0	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	100	-	-	100	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	1	-	-	1	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	85	85	85	85	85	85	85	85	85	85	85	85
Heavy Vehicles, %	0	0	0	0	0	0	0	0	0	0	0	0
Mvmt Flow	0	54	0	16	144	12	24	4	135	1	0	0

Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	156	0	0	54	0	0	236	242	54	306	236	150
Stage 1	-	-	-	-	-	-	54	54	-	182	182	-
Stage 2	-	-	-	-	-	-	182	188	-	124	54	-
Critical Hdwy	4.1	-	-	4.1	-	-	7.1	6.5	6.2	7.1	6.5	6.2
Critical Hdwy Stg 1	-	-	-	-	-	-	6.1	5.5	-	6.1	5.5	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.1	5.5	-	6.1	5.5	-
Follow-up Hdwy	2.2	-	-	2.2	-	-	3.5	4	3.3	3.5	4	3.3
Pot Cap-1 Maneuver	1436	-	-	1564	-	-	723	663	1019	650	668	902
Stage 1	-	-	-	-	-	-	963	854	-	824	753	-
Stage 2	-	-	-	-	-	-	824	748	-	885	854	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	1436	-	-	1564	-	-	717	656	1019	557	661	902
Mov Cap-2 Maneuver	-	-	-	-	-	-	719	653	-	610	655	-
Stage 1	-	-	-	-	-	-	963	854	-	824	745	-
Stage 2	-	-	-	-	-	-	816	741	-	764	854	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	0	0.7	9.6	10.9
HCM LOS			A	B

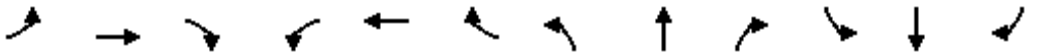
Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1
Capacity (veh/h)	950	1436	-	-	1564	-	-	610
HCM Lane V/C Ratio	0.171	-	-	-	0.011	-	-	0.002
HCM Control Delay (s)	9.6	0	-	-	7.3	-	-	10.9
HCM Lane LOS	A	A	-	-	A	-	-	B
HCM 95th %tile Q(veh)	0.6	0	-	-	0	-	-	0

Lane Group	EBL	EBT	WBL	WBT	NBL	NBT	SBL	SBT
Lane Configurations								
Traffic Volume (vph)	21	9	12	0	62	1587	264	1620
Future Volume (vph)	21	9	12	0	62	1587	264	1620
Turn Type	Perm	NA	Perm	NA	Prot	NA	Prot	NA
Protected Phases		4		8	5	2	1	6
Permitted Phases	4		8					
Detector Phase	4	4	8	8	5	2	1	6
Switch Phase								
Minimum Initial (s)	10.0	10.0	10.0	10.0	5.0	10.0	5.0	10.0
Minimum Split (s)	37.6	37.6	14.6	14.6	9.6	22.8	9.6	22.8
Total Split (s)	38.0	38.0	38.0	38.0	11.0	61.0	31.0	81.0
Total Split (%)	29.2%	29.2%	29.2%	29.2%	8.5%	46.9%	23.8%	62.3%
Yellow Time (s)	3.6	3.6	3.6	3.6	3.6	4.8	3.6	4.8
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	4.6	4.6	4.6	4.6	5.8	4.6	5.8
Lead/Lag					Lead	Lag	Lead	Lag
Lead-Lag Optimize?					Yes	Yes	Yes	Yes
Recall Mode	None	None	None	None	None	C-Max	None	C-Max
Act Effct Green (s)	19.2	19.2	19.2	19.2	7.9	74.5	24.3	90.8
Actuated g/C Ratio	0.15	0.15	0.15	0.15	0.06	0.57	0.19	0.70
v/c Ratio	0.11	0.15	0.07	0.08	0.65	0.69	0.89	0.58
Control Delay	43.5	19.2	41.4	0.3	88.6	24.9	81.2	13.1
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	43.5	19.2	41.4	0.3	88.6	24.9	81.2	13.1
LOS	D	B	D	A	F	C	F	B
Approach Delay		28.1		9.8		27.0		21.7
Approach LOS		C		A		C		C

Intersection Summary	
Cycle Length: 130	
Actuated Cycle Length: 130	
Offset: 0 (0%), Referenced to phase 2:NBT and 6:SBT, Start of Yellow	
Natural Cycle: 110	
Control Type: Actuated-Coordinated	
Maximum v/c Ratio: 0.89	
Intersection Signal Delay: 24.1	Intersection LOS: C
Intersection Capacity Utilization 78.0%	ICU Level of Service D
Analysis Period (min) 15	

Splits and Phases: 4: Valley View St. & Plaza Dr./Chip Av.





Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	21	9	27	12	0	40	62	1587	188	264	1620	214
Future Volume (veh/h)	21	9	27	12	0	40	62	1587	188	264	1620	214
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		0.99	0.99		1.00	1.00		0.98	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adj Flow Rate, veh/h	21	9	22	12	0	34	63	1603	188	267	1636	213
Peak Hour Factor	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	122	33	80	124	0	108	78	2649	310	289	3163	411
Arrive On Green	0.08	0.08	0.08	0.08	0.00	0.08	0.05	0.63	0.63	0.18	0.76	0.76
Sat Flow, veh/h	1249	434	1060	1240	0	1441	1619	4200	491	1619	4157	540
Grp Volume(v), veh/h	21	0	31	12	0	34	63	1180	611	267	1217	632
Grp Sat Flow(s),veh/h/ln	1249	0	1494	1240	0	1441	1619	1547	1598	1619	1547	1602
Q Serve(g_s), s	2.1	0.0	2.5	1.2	0.0	2.9	5.0	29.6	29.7	21.1	20.1	20.3
Cycle Q Clear(g_c), s	5.0	0.0	2.5	3.7	0.0	2.9	5.0	29.6	29.7	21.1	20.1	20.3
Prop In Lane	1.00		0.71	1.00		1.00	1.00		0.31	1.00		0.34
Lane Grp Cap(c), veh/h	122	0	113	124	0	108	78	1951	1008	289	2354	1219
V/C Ratio(X)	0.17	0.00	0.28	0.10	0.00	0.31	0.80	0.60	0.61	0.92	0.52	0.52
Avail Cap(c_a), veh/h	348	0	384	350	0	370	80	1951	1008	329	2354	1219
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	59.3	0.0	56.8	58.5	0.0	56.9	61.2	14.3	14.4	52.5	6.1	6.1
Incr Delay (d2), s/veh	0.7	0.0	1.3	0.3	0.0	1.6	40.0	1.4	2.7	27.4	0.8	1.6
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.7	0.0	1.0	0.4	0.0	1.1	2.9	9.7	10.4	10.5	5.3	5.8
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	60.0	0.0	58.1	58.9	0.0	58.6	101.2	15.7	17.1	79.9	6.9	7.7
LnGrp LOS	E	A	E	E	A	E	F	B	B	E	A	A
Approach Vol, veh/h		52			46			1854			2116	
Approach Delay, s/veh		58.8			58.6			19.1			16.4	
Approach LOS		E			E			B			B	

Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	27.8	87.8		14.4	10.9	104.7		14.4				
Change Period (Y+Rc), s	4.6	5.8		4.6	4.6	5.8		4.6				
Max Green Setting (Gmax), s	26.4	55.2		33.4	6.4	75.2		33.4				
Max Q Clear Time (g_c+I1), s	23.1	31.7		7.0	7.0	22.3		5.7				
Green Ext Time (p_c), s	0.1	13.1		0.2	0.0	19.7		0.2				

Intersection Summary			
HCM 6th Ctrl Delay		18.6	
HCM 6th LOS		B	

Goodman Commerce Center (JN 15593)
Opening Year (2025) Without Project
AM Peak Hour

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Future Volume Alternative)

Intersection #4 Valley View St. & Plaza Dr.

Cycle (sec):	100	Critical Vol./Cap.(X):	0.582
Loss Time (sec):	5	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	28	Level Of Service:	A

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Protected			Protected			Permitted			Permitted		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	1 0	2	1 0	1 0	2	1 0	1 0	0	1 0	1 0	0	1 0
Volume Module:												
Base Vol:	62	1587	188	264	1620	214	21	9	27	12	0	40
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	62	1587	188	264	1620	214	21	9	27	12	0	40
Added Vol:	0	0	0	0	0	0	0	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	62	1587	188	264	1620	214	21	9	27	12	0	40
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	62	1587	188	264	1620	214	21	9	27	12	0	40
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	62	1587	188	264	1620	214	21	9	27	12	0	40
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	62	1587	188	264	1620	214	21	9	27	12	0	40
Saturation Flow Module:												
Sat/Lane:	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	1.00	2.68	0.32	1.00	2.65	0.35	1.00	0.25	0.75	1.00	0.00	1.00
Final Sat.:	1700	4560	540	1700	4505	595	1700	425	1275	1700	0	1700
Capacity Analysis Module:												
Vol/Sat:	0.04	0.35	0.35	0.16	0.36	0.36	0.01	0.02	0.02	0.01	0.00	0.02
Crit Moves:		****		****				****		****		

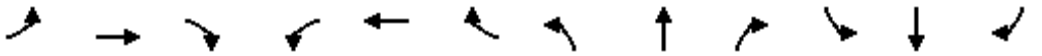
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Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	SBL	SBT	SBR
Lane Configurations											
Traffic Volume (vph)	18	2104	33	9	1755	6	86	1	27	2	69
Future Volume (vph)	18	2104	33	9	1755	6	86	1	27	2	69
Turn Type	Prot	NA	Perm	Prot	NA	Perm	Perm	NA	Perm	NA	Perm
Protected Phases	5	2		1	6			8		4	
Permitted Phases			2			6	8		4		4
Detector Phase	5	2	2	1	6	6	8	8	4	4	4
Switch Phase											
Minimum Initial (s)	5.0	10.0	10.0	5.0	10.0	10.0	10.0	10.0	10.0	10.0	10.0
Minimum Split (s)	9.6	22.8	22.8	9.6	22.8	22.8	40.6	40.6	40.6	40.6	40.6
Total Split (s)	10.0	78.0	78.0	10.0	78.0	78.0	42.0	42.0	42.0	42.0	42.0
Total Split (%)	7.7%	60.0%	60.0%	7.7%	60.0%	60.0%	32.3%	32.3%	32.3%	32.3%	32.3%
Yellow Time (s)	3.6	4.8	4.8	3.6	4.8	4.8	3.6	3.6	3.6	3.6	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.8	5.8	4.6	5.8	5.8	4.6	4.6	4.6	4.6	4.6
Lead/Lag	Lead	Lag	Lag	Lead	Lag	Lag					
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes	Yes					
Recall Mode	None	C-Max	C-Max	None	C-Max	C-Max	None	None	None	None	None
Act Effct Green (s)	5.9	95.4	95.4	5.6	91.0	91.0	21.9	21.9	21.9	21.9	21.9
Actuated g/C Ratio	0.05	0.73	0.73	0.04	0.70	0.70	0.17	0.17	0.17	0.17	0.17
v/c Ratio	0.27	0.69	0.04	0.14	0.61	0.01	0.45	0.04	0.14	0.01	0.26
Control Delay	68.9	14.1	1.9	64.1	14.4	0.0	52.0	19.6	41.8	36.0	9.6
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	68.9	14.1	1.9	64.1	14.4	0.0	52.0	19.6	41.8	36.0	9.6
LOS	E	B	A	E	B	A	D	B	D	D	A
Approach Delay		14.4			14.6			49.2		18.9	
Approach LOS		B			B			D		B	

Intersection Summary	
Cycle Length: 130	
Actuated Cycle Length: 130	
Offset: 0 (0%), Referenced to phase 2:EBT and 6:WBT, Start of Yellow	
Natural Cycle: 110	
Control Type: Actuated-Coordinated	
Maximum v/c Ratio: 0.69	
Intersection Signal Delay: 15.4	Intersection LOS: B
Intersection Capacity Utilization 67.1%	ICU Level of Service C
Analysis Period (min) 15	

Splits and Phases: 1: Douglas Dr. & Katella Av.





Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	18	2104	33	9	1755	6	86	1	7	27	2	69
Future Volume (veh/h)	18	2104	33	9	1755	6	86	1	7	27	2	69
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		0.98	1.00		0.98	1.00		1.00	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adj Flow Rate, veh/h	20	2364	31	10	1972	7	97	1	4	30	2	44
Peak Hour Factor	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	32	3617	1098	19	3579	1087	170	28	111	172	159	133
Arrive On Green	0.02	0.78	0.78	0.01	0.77	0.77	0.09	0.09	0.09	0.09	0.09	0.09
Sat Flow, veh/h	1619	4641	1409	1619	4641	1410	1236	297	1189	1283	1700	1420
Grp Volume(v), veh/h	20	2364	31	10	1972	7	97	0	5	30	2	44
Grp Sat Flow(s),veh/h/ln	1619	1547	1409	1619	1547	1410	1236	0	1486	1283	1700	1420
Q Serve(g_s), s	1.6	29.8	0.6	0.8	22.0	0.1	10.0	0.0	0.4	2.8	0.1	3.8
Cycle Q Clear(g_c), s	1.6	29.8	0.6	0.8	22.0	0.1	10.2	0.0	0.4	3.2	0.1	3.8
Prop In Lane	1.00		1.00	1.00		1.00	1.00		0.80	1.00		1.00
Lane Grp Cap(c), veh/h	32	3617	1098	19	3579	1087	170	0	139	172	159	133
V/C Ratio(X)	0.62	0.65	0.03	0.53	0.55	0.01	0.57	0.00	0.04	0.17	0.01	0.33
Avail Cap(c_a), veh/h	67	3617	1098	67	3579	1087	410	0	428	420	489	409
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	63.2	6.5	3.2	63.9	5.9	3.4	58.1	0.0	53.6	55.0	53.5	55.1
Incr Delay (d2), s/veh	7.2	0.9	0.0	8.3	0.6	0.0	3.0	0.0	0.1	0.5	0.0	1.4
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.7	7.4	0.2	0.4	5.6	0.0	3.3	0.0	0.2	1.0	0.1	1.4
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	70.4	7.4	3.3	72.2	6.5	3.4	61.1	0.0	53.7	55.5	53.5	56.5
LnGrp LOS	E	A	A	E	A	A	E	A	D	E	D	E
Approach Vol, veh/h		2415			1989			102			76	
Approach Delay, s/veh		7.9			6.9			60.7			56.1	
Approach LOS		A			A			E			E	

Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	6.1	107.1		16.8	7.2	106.0		16.8				
Change Period (Y+Rc), s	4.6	5.8		4.6	4.6	5.8		4.6				
Max Green Setting (Gmax), s	5.4	72.2		37.4	5.4	72.2		37.4				
Max Q Clear Time (g_c+I1), s	2.8	31.8		5.8	3.6	24.0		12.2				
Green Ext Time (p_c), s	0.0	27.3		0.2	0.0	22.8		0.3				

Intersection Summary			
HCM 6th Ctrl Delay		9.4	
HCM 6th LOS		A	

Goodman Commerce Center (JN 15593)
Opening Year (2025) Without Project
PM Peak Hour

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Future Volume Alternative)

Intersection #1 Douglas Dr. & Katella Av.

Cycle (sec):	100	Critical Vol./Cap.(X):	0.559
Loss Time (sec):	5	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	26	Level Of Service:	A

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	1 0	0 1	0	1 0	1 0	1	1 0	3 0	1	1 0	3 0	1
Volume Module:												
Base Vol:	86	1	7	27	2	69	18	2104	33	9	1755	6
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	86	1	7	27	2	69	18	2104	33	9	1755	6
Added Vol:	0	0	0	0	0	0	0	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	86	1	7	27	2	69	18	2104	33	9	1755	6
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	86	1	7	27	2	69	18	2104	33	9	1755	6
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	86	1	7	27	2	69	18	2104	33	9	1755	6
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	86	1	7	27	2	69	18	2104	33	9	1755	6
Saturation Flow Module:												
Sat/Lane:	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	1.00	0.12	0.88	1.00	1.00	1.00	1.00	3.00	1.00	1.00	3.00	1.00
Final Sat.:	1700	213	1488	1700	1700	1700	1700	5100	1700	1700	5100	1700
Capacity Analysis Module:												
Vol/Sat:	0.05	0.00	0.00	0.02	0.00	0.04	0.01	0.41	0.02	0.01	0.34	0.00
Crit Moves:	****					****		****		****		

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Intersection	
Intersection Delay, s/veh	7.8
Intersection LOS	A

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	0	0	121	0	1	0	1	29	3	4	0
Future Vol, veh/h	0	0	0	121	0	1	0	1	29	3	4	0
Peak Hour Factor	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75
Heavy Vehicles, %	0	0	0	0	0	0	0	0	0	0	0	0
Mvmt Flow	0	0	0	161	0	1	0	1	39	4	5	0
Number of Lanes	0	0	0	1	0	0	0	0	1	0	0	0

Approach	WB	NB
Opposing Approach		
Opposing Lanes	0	0
Conflicting Approach Left	NB	
Conflicting Lanes Left	1	0
Conflicting Approach Right		WB
Conflicting Lanes Right	0	1
HCM Control Delay	8.1	6.8
HCM LOS	A	A

Lane	NBLn1	WBLn1
Vol Left, %	0%	99%
Vol Thru, %	3%	0%
Vol Right, %	97%	1%
Sign Control	Stop	Stop
Traffic Vol by Lane	30	122
LT Vol	0	121
Through Vol	1	0
RT Vol	29	1
Lane Flow Rate	40	163
Geometry Grp	1	1
Degree of Util (X)	0.04	0.188
Departure Headway (Hd)	3.604	4.164
Convergence, Y/N	Yes	Yes
Cap	977	865
Service Time	1.688	2.172
HCM Lane V/C Ratio	0.041	0.188
HCM Control Delay	6.8	8.1
HCM Lane LOS	A	A
HCM 95th-tile Q	0.1	0.7

Intersection	
Int Delay, s/veh	2.3

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	103	2	43	102	2	5	0	16	7	4	0
Future Vol, veh/h	0	103	2	43	102	2	5	0	16	7	4	0
Conflicting Peds, #/hr	0	0	0	0	0	0	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	100	-	-	100	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	1	-	-	1	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	63	63	63	63	63	63	63	63	63	63	63	63
Heavy Vehicles, %	0	0	0	0	0	0	0	0	0	0	0	0
Mvmt Flow	0	163	3	68	162	3	8	0	25	11	6	0

Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	165	0	0	166	0	0	468	466	165	477	466	164
Stage 1	-	-	-	-	-	-	165	165	-	300	300	-
Stage 2	-	-	-	-	-	-	303	301	-	177	166	-
Critical Hdwy	4.1	-	-	4.1	-	-	7.1	6.5	6.2	7.1	6.5	6.2
Critical Hdwy Stg 1	-	-	-	-	-	-	6.1	5.5	-	6.1	5.5	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.1	5.5	-	6.1	5.5	-
Follow-up Hdwy	2.2	-	-	2.2	-	-	3.5	4	3.3	3.5	4	3.3
Pot Cap-1 Maneuver	1426	-	-	1424	-	-	509	497	885	502	497	886
Stage 1	-	-	-	-	-	-	842	766	-	713	669	-
Stage 2	-	-	-	-	-	-	711	669	-	829	765	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	1426	-	-	1424	-	-	486	473	885	470	473	886
Mov Cap-2 Maneuver	-	-	-	-	-	-	554	528	-	545	518	-
Stage 1	-	-	-	-	-	-	842	766	-	713	637	-
Stage 2	-	-	-	-	-	-	670	637	-	805	765	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	0	2.2	9.9	12
HCM LOS			A	B

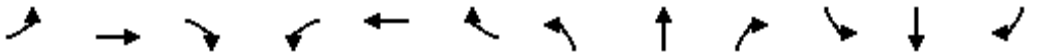
Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1
Capacity (veh/h)	775	1426	-	-	1424	-	-	535
HCM Lane V/C Ratio	0.043	-	-	-	0.048	-	-	0.033
HCM Control Delay (s)	9.9	0	-	-	7.7	-	-	12
HCM Lane LOS	A	A	-	-	A	-	-	B
HCM 95th %tile Q(veh)	0.1	0	-	-	0.2	-	-	0.1

Lane Group	EBL	EBT	WBL	WBT	NBL	NBT	SBL	SBT
Lane Configurations								
Traffic Volume (vph)	226	0	169	31	16	2061	54	1582
Future Volume (vph)	226	0	169	31	16	2061	54	1582
Turn Type	Perm	NA	Perm	NA	Prot	NA	Prot	NA
Protected Phases		4		8	5	2	1	6
Permitted Phases	4		8					
Detector Phase	4	4	8	8	5	2	1	6
Switch Phase								
Minimum Initial (s)	10.0	10.0	10.0	10.0	5.0	10.0	5.0	10.0
Minimum Split (s)	37.6	37.6	14.6	14.6	9.6	22.8	9.6	22.8
Total Split (s)	50.0	50.0	50.0	50.0	11.0	69.0	11.0	69.0
Total Split (%)	38.5%	38.5%	38.5%	38.5%	8.5%	53.1%	8.5%	53.1%
Yellow Time (s)	3.6	3.6	3.6	3.6	3.6	4.8	3.6	4.8
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	4.6	4.6	4.6	4.6	5.8	4.6	5.8
Lead/Lag					Lead	Lag	Lead	Lag
Lead-Lag Optimize?					Yes	Yes	Yes	Yes
Recall Mode	None	None	None	None	None	C-Max	None	C-Max
Act Effct Green (s)	45.4	45.4	45.4	45.4	5.7	65.4	6.2	69.8
Actuated g/C Ratio	0.35	0.35	0.35	0.35	0.04	0.50	0.05	0.54
v/c Ratio	1.42	0.19	0.44	0.72	0.24	0.93	0.73	0.68
Control Delay	252.2	5.7	36.8	35.5	68.0	38.7	106.6	24.4
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	252.2	5.7	36.8	35.5	68.0	38.7	106.6	24.4
LOS	F	A	D	D	E	D	F	C
Approach Delay		175.5		35.9		39.0		27.1
Approach LOS		F		D		D		C

Intersection Summary	
Cycle Length: 130	
Actuated Cycle Length: 130	
Offset: 0 (0%), Referenced to phase 2:NBT and 6:SBT, Start of Yellow	
Natural Cycle: 120	
Control Type: Actuated-Coordinated	
Maximum v/c Ratio: 1.42	
Intersection Signal Delay: 43.9	Intersection LOS: D
Intersection Capacity Utilization 104.0%	ICU Level of Service G
Analysis Period (min) 15	

Splits and Phases: 4: Valley View St. & Plaza Dr./Chip Av.





Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	226	0	102	169	31	369	16	2061	12	54	1582	37
Future Volume (veh/h)	226	0	102	169	31	369	16	2061	12	54	1582	37
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		0.98	1.00		0.97
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adj Flow Rate, veh/h	235	0	86	176	32	325	17	2147	12	56	1648	36
Peak Hour Factor	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	185	0	503	422	46	464	29	2344	13	70	2418	53
Arrive On Green	0.35	0.00	0.35	0.35	0.35	0.35	0.02	0.49	0.49	0.04	0.52	0.52
Sat Flow, veh/h	931	0	1439	1191	131	1330	1619	4762	27	1619	4670	102
Grp Volume(v), veh/h	235	0	86	176	0	357	17	1395	764	56	1092	592
Grp Sat Flow(s),veh/h/ln	931	0	1439	1191	0	1461	1619	1547	1695	1619	1547	1678
Q Serve(g_s), s	18.0	0.0	5.4	15.6	0.0	27.4	1.4	54.2	54.2	4.5	34.2	34.2
Cycle Q Clear(g_c), s	45.4	0.0	5.4	21.0	0.0	27.4	1.4	54.2	54.2	4.5	34.2	34.2
Prop In Lane	1.00		1.00	1.00		0.91	1.00		0.02	1.00		0.06
Lane Grp Cap(c), veh/h	185	0	503	422	0	510	29	1523	834	70	1602	869
V/C Ratio(X)	1.27	0.00	0.17	0.42	0.00	0.70	0.60	0.92	0.92	0.80	0.68	0.68
Avail Cap(c_a), veh/h	185	0	503	422	0	510	80	1523	834	80	1602	869
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	58.7	0.0	29.3	36.5	0.0	36.4	63.4	30.5	30.5	61.7	23.4	23.4
Incr Delay (d2), s/veh	158.3	0.0	0.2	0.7	0.0	4.2	7.1	10.1	16.4	34.3	2.4	4.3
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	14.3	0.0	1.9	4.7	0.0	10.4	0.6	20.9	24.4	2.5	12.2	13.7
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	217.0	0.0	29.4	37.2	0.0	40.7	70.5	40.6	47.0	95.9	25.7	27.7
LnGrp LOS	F	A	C	D	A	D	E	D	D	F	C	C
Approach Vol, veh/h		321			533			2176			1740	
Approach Delay, s/veh		166.8			39.5			43.1			28.6	
Approach LOS		F			D			D			C	

Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	10.2	69.8		50.0	6.9	73.1		50.0				
Change Period (Y+Rc), s	4.6	5.8		4.6	4.6	5.8		4.6				
Max Green Setting (Gmax), s	6.4	63.2		45.4	6.4	63.2		45.4				
Max Q Clear Time (g_c+I1), s	6.5	56.2		47.4	3.4	36.2		29.4				
Green Ext Time (p_c), s	0.0	5.9		0.0	0.0	12.9		2.9				

Intersection Summary			
HCM 6th Ctrl Delay		45.7	
HCM 6th LOS		D	

Goodman Commerce Center (JN 15593)
Opening Year (2025) Without Project
PM Peak Hour

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Future Volume Alternative)

Intersection #4 Valley View St. & Plaza Dr.

Cycle (sec):	100	Critical Vol./Cap.(X):	0.856
Loss Time (sec):	5	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	67	Level Of Service:	D

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Protected			Protected			Permitted			Permitted		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	1 0	2	1 0	1 0	2	1 0	1 0	0	1 0	1 0	0	1 0
Volume Module:												
Base Vol:	16	2061	12	54	1582	37	226	0	102	169	31	369
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	16	2061	12	54	1582	37	226	0	102	169	31	369
Added Vol:	0	0	0	0	0	0	0	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	16	2061	12	54	1582	37	226	0	102	169	31	369
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	16	2061	12	54	1582	37	226	0	102	169	31	369
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	16	2061	12	54	1582	37	226	0	102	169	31	369
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	16	2061	12	54	1582	37	226	0	102	169	31	369
Saturation Flow Module:												
Sat/Lane:	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	1.00	2.98	0.02	1.00	2.93	0.07	1.00	0.00	1.00	1.00	0.08	0.92
Final Sat.:	1700	5070	30	1700	4983	117	1700	0	1700	1700	132	1568
Capacity Analysis Module:												
Vol/Sat:	0.01	0.41	0.41	0.03	0.32	0.32	0.13	0.00	0.06	0.10	0.24	0.24
Crit Moves:		****			****			****			****	

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APPENDIX 6.2: FUTURE YEAR (2025) WITH PROJECT CONDITIONS INTERSECTION OPERATIONS ANALYSIS WORKSHEETS

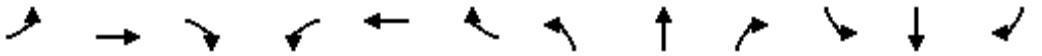
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Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	SBL	SBT	SBR
Lane Configurations											
Traffic Volume (vph)	59	1828	74	12	1886	38	27	2	5	1	27
Future Volume (vph)	59	1828	74	12	1886	38	27	2	5	1	27
Turn Type	Prot	NA	Perm	Prot	NA	Perm	Perm	NA	Perm	NA	Perm
Protected Phases	5	2		1	6			8		4	
Permitted Phases			2			6	8		4		4
Detector Phase	5	2	2	1	6	6	8	8	4	4	4
Switch Phase											
Minimum Initial (s)	5.0	10.0	10.0	5.0	10.0	10.0	10.0	10.0	10.0	10.0	10.0
Minimum Split (s)	9.6	22.8	22.8	9.6	22.8	22.8	40.6	40.6	40.6	40.6	40.6
Total Split (s)	10.0	78.0	78.0	10.0	78.0	78.0	42.0	42.0	42.0	42.0	42.0
Total Split (%)	7.7%	60.0%	60.0%	7.7%	60.0%	60.0%	32.3%	32.3%	32.3%	32.3%	32.3%
Yellow Time (s)	3.6	4.8	4.8	3.6	4.8	4.8	3.6	3.6	3.6	3.6	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.8	5.8	4.6	5.8	5.8	4.6	4.6	4.6	4.6	4.6
Lead/Lag	Lead	Lag	Lag	Lead	Lag	Lag					
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes	Yes					
Recall Mode	None	C-Max	C-Max	None	C-Max	C-Max	None	None	None	None	None
Act Effct Green (s)	8.4	102.9	102.9	5.7	92.1	92.1	20.4	20.4	20.4	20.4	20.4
Actuated g/C Ratio	0.06	0.79	0.79	0.04	0.71	0.71	0.16	0.16	0.16	0.16	0.16
v/c Ratio	0.59	0.52	0.07	0.18	0.60	0.04	0.14	0.03	0.03	0.00	0.10
Control Delay	82.2	11.5	4.9	65.4	14.1	2.4	42.7	24.3	37.6	36.0	1.2
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	82.2	11.5	4.9	65.4	14.1	2.4	42.7	24.3	37.6	36.0	1.2
LOS	F	B	A	E	B	A	D	C	D	D	A
Approach Delay		13.3			14.2			39.0		7.6	
Approach LOS		B			B			D		A	

Intersection Summary	
Cycle Length: 130	
Actuated Cycle Length: 130	
Offset: 0 (0%), Referenced to phase 2:EBT and 6:WBT, Start of Yellow	
Natural Cycle: 90	
Control Type: Actuated-Coordinated	
Maximum v/c Ratio: 0.60	
Intersection Signal Delay: 13.9	Intersection LOS: B
Intersection Capacity Utilization 70.6%	ICU Level of Service C
Analysis Period (min) 15	

Splits and Phases: 1: Douglas Dr. & Katella Av.





Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	59	1828	74	12	1886	38	27	2	5	5	1	27
Future Volume (veh/h)	59	1828	74	12	1886	38	27	2	5	5	1	27
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		0.98	1.00		0.98	0.99		0.98	1.00		0.98
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adj Flow Rate, veh/h	61	1904	69	12	1965	35	28	2	2	5	1	18
Peak Hour Factor	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	67	3798	1154	22	3668	1114	121	41	41	120	90	75
Arrive On Green	0.04	0.82	0.82	0.01	0.79	0.79	0.05	0.05	0.05	0.05	0.05	0.05
Sat Flow, veh/h	1619	4641	1410	1619	4641	1409	1260	771	771	1284	1700	1414
Grp Volume(v), veh/h	61	1904	69	12	1965	35	28	0	4	5	1	18
Grp Sat Flow(s),veh/h/ln	1619	1547	1410	1619	1547	1409	1260	0	1542	1284	1700	1414
Q Serve(g_s), s	4.9	16.4	1.2	1.0	20.0	0.7	2.8	0.0	0.3	0.5	0.1	1.6
Cycle Q Clear(g_c), s	4.9	16.4	1.2	1.0	20.0	0.7	2.9	0.0	0.3	0.8	0.1	1.6
Prop In Lane	1.00		1.00	1.00		1.00	1.00		0.50	1.00		1.00
Lane Grp Cap(c), veh/h	67	3798	1154	22	3668	1114	121	0	81	120	90	75
V/C Ratio(X)	0.91	0.50	0.06	0.55	0.54	0.03	0.23	0.00	0.05	0.04	0.01	0.24
Avail Cap(c_a), veh/h	67	3798	1154	67	3668	1114	417	0	444	422	489	407
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	62.0	3.6	2.3	63.7	5.0	2.9	59.7	0.0	58.5	58.9	58.4	59.1
Incr Delay (d2), s/veh	76.5	0.5	0.1	7.7	0.6	0.1	1.0	0.0	0.2	0.1	0.0	1.7
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.4	3.4	0.2	0.4	4.7	0.2	0.9	0.0	0.1	0.2	0.0	0.6
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	138.6	4.1	2.4	71.4	5.5	3.0	60.7	0.0	58.7	59.0	58.4	60.7
LnGrp LOS	F	A	A	E	A	A	E	A	E	E	E	E
Approach Vol, veh/h		2034			2012			32			24	
Approach Delay, s/veh		8.1			5.9			60.4			60.3	
Approach LOS		A			A			E			E	

Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	6.4	112.2		11.5	10.0	108.5		11.5				
Change Period (Y+Rc), s	4.6	5.8		4.6	4.6	5.8		4.6				
Max Green Setting (Gmax), s	5.4	72.2		37.4	5.4	72.2		37.4				
Max Q Clear Time (g_c+I1), s	3.0	18.4		3.6	6.9	22.0		4.9				
Green Ext Time (p_c), s	0.0	22.9		0.0	0.0	23.3		0.1				

Intersection Summary												
HCM 6th Ctrl Delay			7.7									
HCM 6th LOS			A									

Goodman Commerce Center (JN 15593)
Opening Year (2025) With Project
AM Peak Hour

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Future Volume Alternative)

Intersection #1 Douglas Dr. & Katella Av.

Cycle (sec):	100	Critical Vol./Cap.(X):	0.486
Loss Time (sec):	5	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	23	Level Of Service:	A

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	1 0	0 1	0	1 0	1 0	1	1 0	3 0	1	1 0	3 0	1
Volume Module:												
Base Vol:	27	2	5	2	1	22	49	1828	74	12	1886	35
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	27	2	5	2	1	22	49	1828	74	12	1886	35
Added Vol:	0	0	0	3	0	5	10	0	0	0	0	3
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	27	2	5	5	1	27	59	1828	74	12	1886	38
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	27	2	5	5	1	27	59	1828	74	12	1886	38
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	27	2	5	5	1	27	59	1828	74	12	1886	38
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	27	2	5	5	1	27	59	1828	74	12	1886	38
Saturation Flow Module:												
Sat/Lane:	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	1.00	0.29	0.71	1.00	1.00	1.00	1.00	3.00	1.00	1.00	3.00	1.00
Final Sat.:	1700	486	1214	1700	1700	1700	1700	5100	1700	1700	5100	1700
Capacity Analysis Module:												
Vol/Sat:	0.02	0.00	0.00	0.00	0.00	0.02	0.03	0.36	0.04	0.01	0.37	0.02
Crit Moves:	****					****	****				****	

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Goodman Commerce Center (JN 15593)
Opening Year (2025) With Project WITH IMPROVEMENTS
AM Peak Hour

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Future Volume Alternative)

Intersection #1 Douglas Dr. & Katella Av.

Cycle (sec):	100	Critical Vol./Cap.(X):	0.494
Loss Time (sec):	5	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	23	Level Of Service:	A

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	1 0	0 1	0	1 0	1 0	1	1 0	3 0	1	1 0	2 1	0
Volume Module:												
Base Vol:	27	2	5	2	1	22	49	1828	74	12	1886	35
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	27	2	5	2	1	22	49	1828	74	12	1886	35
Added Vol:	0	0	0	3	0	5	10	0	0	0	0	3
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	27	2	5	5	1	27	59	1828	74	12	1886	38
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	27	2	5	5	1	27	59	1828	74	12	1886	38
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	27	2	5	5	1	27	59	1828	74	12	1886	38
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	27	2	5	5	1	27	59	1828	74	12	1886	38
Saturation Flow Module:												
Sat/Lane:	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	1.00	0.29	0.71	1.00	1.00	1.00	1.00	3.00	1.00	1.00	2.94	0.06
Final Sat.:	1700	486	1214	1700	1700	1700	1700	5100	1700	1700	4999	101
Capacity Analysis Module:												
Vol/Sat:	0.02	0.00	0.00	0.00	0.00	0.02	0.03	0.36	0.04	0.01	0.38	0.38
Crit Moves:	****					****	****				****	

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Intersection	
Intersection Delay, s/veh	7.3
Intersection LOS	A

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	2	7	62	4	5	6	11	39	0	0	0
Future Vol, veh/h	0	2	7	62	4	5	6	11	39	0	0	0
Peak Hour Factor	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86
Heavy Vehicles, %	0	0	0	0	0	0	0	0	0	0	0	0
Mvmt Flow	0	2	8	72	5	6	7	13	45	0	0	0
Number of Lanes	0	1	0	0	1	0	0	1	0	0	1	0

Approach	EB	WB	NB	SB
Opposing Approach	WB	EB	SB	NB
Opposing Lanes	1	1	1	1
Conflicting Approach Left	SB	NB	EB	WB
Conflicting Lanes Left	1	1	1	1
Conflicting Approach Right	NB	SB	WB	EB
Conflicting Lanes Right	1	1	1	1
HCM Control Delay	6.7	7.6	7	0
HCM LOS	A	A	A	-

Lane	NBLn1	EBLn1	WBLn1	SBLn1
Vol Left, %	11%	0%	87%	0%
Vol Thru, %	20%	22%	6%	100%
Vol Right, %	70%	78%	7%	0%
Sign Control	Stop	Stop	Stop	Stop
Traffic Vol by Lane	56	9	71	0
LT Vol	6	0	62	0
Through Vol	11	2	4	0
RT Vol	39	7	5	0
Lane Flow Rate	65	10	83	0
Geometry Grp	1	1	1	1
Degree of Util (X)	0.066	0.01	0.095	0
Departure Headway (Hd)	3.663	3.609	4.155	4.111
Convergence, Y/N	Yes	Yes	Yes	Yes
Cap	972	988	864	0
Service Time	1.707	1.644	2.171	2.163
HCM Lane V/C Ratio	0.067	0.01	0.096	0
HCM Control Delay	7	6.7	7.6	7.2
HCM Lane LOS	A	A	A	N
HCM 95th-tile Q	0.2	0	0.3	0

Intersection	
Int Delay, s/veh	4.3

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	48	0	14	127	6	21	3	115	1	0	0
Future Vol, veh/h	0	48	0	14	127	6	21	3	115	1	0	0
Conflicting Peds, #/hr	0	0	0	0	0	0	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	100	-	-	100	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	1	-	-	1	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	85	85	85	85	85	85	85	85	85	85	85	85
Heavy Vehicles, %	0	0	0	0	0	0	0	0	0	0	0	0
Mvmt Flow	0	56	0	16	149	7	25	4	135	1	0	0

Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	156	0	0	56	0	0	241	244	56	311	241	153
Stage 1	-	-	-	-	-	-	56	56	-	185	185	-
Stage 2	-	-	-	-	-	-	185	188	-	126	56	-
Critical Hdwy	4.1	-	-	4.1	-	-	7.1	6.5	6.2	7.1	6.5	6.2
Critical Hdwy Stg 1	-	-	-	-	-	-	6.1	5.5	-	6.1	5.5	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.1	5.5	-	6.1	5.5	-
Follow-up Hdwy	2.2	-	-	2.2	-	-	3.5	4	3.3	3.5	4	3.3
Pot Cap-1 Maneuver	1436	-	-	1562	-	-	717	661	1016	645	664	898
Stage 1	-	-	-	-	-	-	961	852	-	821	751	-
Stage 2	-	-	-	-	-	-	821	748	-	883	852	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	1436	-	-	1562	-	-	711	654	1016	553	657	898
Mov Cap-2 Maneuver	-	-	-	-	-	-	715	652	-	607	653	-
Stage 1	-	-	-	-	-	-	961	852	-	821	743	-
Stage 2	-	-	-	-	-	-	813	741	-	762	852	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	0	0.7	9.6	10.9
HCM LOS			A	B

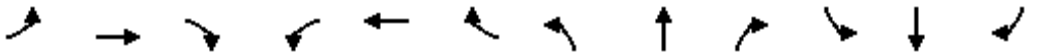
Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1
Capacity (veh/h)	945	1436	-	-	1562	-	-	607
HCM Lane V/C Ratio	0.173	-	-	-	0.011	-	-	0.002
HCM Control Delay (s)	9.6	0	-	-	7.3	-	-	10.9
HCM Lane LOS	A	A	-	-	A	-	-	B
HCM 95th %tile Q(veh)	0.6	0	-	-	0	-	-	0

Lane Group	EBL	EBT	WBL	WBT	NBL	NBT	SBL	SBT
Lane Configurations								
Traffic Volume (vph)	23	9	12	0	62	1587	264	1620
Future Volume (vph)	23	9	12	0	62	1587	264	1620
Turn Type	Perm	NA	Perm	NA	Prot	NA	Prot	NA
Protected Phases		4		8	5	2	1	6
Permitted Phases	4		8					
Detector Phase	4	4	8	8	5	2	1	6
Switch Phase								
Minimum Initial (s)	10.0	10.0	10.0	10.0	5.0	10.0	5.0	10.0
Minimum Split (s)	37.6	37.6	14.6	14.6	9.6	22.8	9.6	22.8
Total Split (s)	38.0	38.0	38.0	38.0	11.0	61.0	31.0	81.0
Total Split (%)	29.2%	29.2%	29.2%	29.2%	8.5%	46.9%	23.8%	62.3%
Yellow Time (s)	3.6	3.6	3.6	3.6	3.6	4.8	3.6	4.8
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	4.6	4.6	4.6	4.6	5.8	4.6	5.8
Lead/Lag					Lead	Lag	Lead	Lag
Lead-Lag Optimize?					Yes	Yes	Yes	Yes
Recall Mode	None	None	None	None	None	C-Max	None	C-Max
Act Effct Green (s)	19.2	19.2	19.2	19.2	7.9	74.5	24.3	90.8
Actuated g/C Ratio	0.15	0.15	0.15	0.15	0.06	0.57	0.19	0.70
v/c Ratio	0.13	0.15	0.07	0.08	0.65	0.69	0.89	0.58
Control Delay	44.0	19.2	41.4	0.3	88.6	24.9	81.2	13.2
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	44.0	19.2	41.4	0.3	88.6	24.9	81.2	13.2
LOS	D	B	D	A	F	C	F	B
Approach Delay		28.8		9.8		27.0		21.7
Approach LOS		C		A		C		C

Intersection Summary	
Cycle Length: 130	
Actuated Cycle Length: 130	
Offset: 0 (0%), Referenced to phase 2:NBT and 6:SBT, Start of Yellow	
Natural Cycle: 110	
Control Type: Actuated-Coordinated	
Maximum v/c Ratio: 0.89	
Intersection Signal Delay: 24.1	Intersection LOS: C
Intersection Capacity Utilization 78.0%	ICU Level of Service D
Analysis Period (min) 15	

Splits and Phases: 4: Valley View St. & Plaza Dr./Chip Av.





Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	23	9	27	12	0	40	62	1587	188	264	1620	219
Future Volume (veh/h)	23	9	27	12	0	40	62	1587	188	264	1620	219
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		0.99	0.99		1.00	1.00		0.98	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adj Flow Rate, veh/h	23	9	22	12	0	34	63	1603	188	267	1636	218
Peak Hour Factor	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	123	33	81	125	0	110	78	2646	310	289	3150	418
Arrive On Green	0.08	0.08	0.08	0.08	0.00	0.08	0.05	0.63	0.63	0.18	0.76	0.76
Sat Flow, veh/h	1249	434	1060	1240	0	1441	1619	4200	491	1619	4144	550
Grp Volume(v), veh/h	23	0	31	12	0	34	63	1180	611	267	1220	634
Grp Sat Flow(s),veh/h/ln	1249	0	1494	1240	0	1441	1619	1547	1598	1619	1547	1600
Q Serve(g_s), s	2.3	0.0	2.5	1.2	0.0	2.9	5.0	29.7	29.8	21.1	20.3	20.4
Cycle Q Clear(g_c), s	5.2	0.0	2.5	3.7	0.0	2.9	5.0	29.7	29.8	21.1	20.3	20.4
Prop In Lane	1.00		0.71	1.00		1.00	1.00		0.31	1.00		0.34
Lane Grp Cap(c), veh/h	123	0	114	125	0	110	78	1949	1006	289	2352	1216
V/C Ratio(X)	0.19	0.00	0.27	0.10	0.00	0.31	0.80	0.61	0.61	0.92	0.52	0.52
Avail Cap(c_a), veh/h	348	0	384	350	0	370	80	1949	1006	329	2352	1216
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	59.3	0.0	56.7	58.4	0.0	56.8	61.2	14.4	14.4	52.5	6.2	6.2
Incr Delay (d2), s/veh	0.7	0.0	1.3	0.3	0.0	1.6	40.0	1.4	2.7	27.4	0.8	1.6
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.8	0.0	1.0	0.4	0.0	1.1	2.9	9.8	10.5	10.5	5.4	5.9
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	60.0	0.0	57.9	58.8	0.0	58.4	101.2	15.8	17.1	79.9	7.0	7.8
LnGrp LOS	E	A	E	E	A	E	F	B	B	E	A	A
Approach Vol, veh/h		54			46			1854			2121	
Approach Delay, s/veh		58.8			58.5			19.1			16.4	
Approach LOS		E			E			B			B	

Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	27.8	87.7		14.5	10.9	104.6		14.5				
Change Period (Y+Rc), s	4.6	5.8		4.6	4.6	5.8		4.6				
Max Green Setting (Gmax), s	26.4	55.2		33.4	6.4	75.2		33.4				
Max Q Clear Time (g_c+I1), s	23.1	31.8		7.2	7.0	22.4		5.7				
Green Ext Time (p_c), s	0.1	13.1		0.2	0.0	19.8		0.2				

Intersection Summary			
HCM 6th Ctrl Delay		18.7	
HCM 6th LOS		B	

Goodman Commerce Center (JN 15593)
Opening Year (2025) With Project
AM Peak Hour

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Future Volume Alternative)

Intersection #4 Valley View St. & Plaza Dr.

Cycle (sec):	100	Critical Vol./Cap.(X):	0.582
Loss Time (sec):	5	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	28	Level Of Service:	A

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Protected			Protected			Permitted			Permitted		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	1 0	2	1 0	1 0	2	1 0	1 0	0	1 0	1 0	0	1 0
Volume Module:												
Base Vol:	62	1587	188	264	1620	214	21	9	27	12	0	40
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	62	1587	188	264	1620	214	21	9	27	12	0	40
Added Vol:	0	0	0	0	0	5	2	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	62	1587	188	264	1620	219	23	9	27	12	0	40
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	62	1587	188	264	1620	219	23	9	27	12	0	40
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	62	1587	188	264	1620	219	23	9	27	12	0	40
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	62	1587	188	264	1620	219	23	9	27	12	0	40
Saturation Flow Module:												
Sat/Lane:	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	1.00	2.68	0.32	1.00	2.64	0.36	1.00	0.25	0.75	1.00	0.00	1.00
Final Sat.:	1700	4560	540	1700	4493	607	1700	425	1275	1700	0	1700
Capacity Analysis Module:												
Vol/Sat:	0.04	0.35	0.35	0.16	0.36	0.36	0.01	0.02	0.02	0.01	0.00	0.02
Crit Moves:		****		****				****		****		

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Goodman Commerce Center (JN 15593)
Opening Year (2025) With Project
PM Peak Hour

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Future Volume Alternative)

Intersection #1 Douglas Dr. & Katella Av.

Cycle (sec):	100	Critical Vol./Cap.(X):	0.565
Loss Time (sec):	5	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	27	Level Of Service:	A

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	1 0	0 1	0	1 0	1 0	1	1 0	3 0	1	1 0	3 0	1
Volume Module:												
Base Vol:	86	1	7	27	2	69	18	2104	33	9	1755	6
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	86	1	7	27	2	69	18	2104	33	9	1755	6
Added Vol:	0	0	0	4	0	11	6	0	0	0	0	3
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	86	1	7	31	2	80	24	2104	33	9	1755	9
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	86	1	7	31	2	80	24	2104	33	9	1755	9
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	86	1	7	31	2	80	24	2104	33	9	1755	9
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	86	1	7	31	2	80	24	2104	33	9	1755	9
Saturation Flow Module:												
Sat/Lane:	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	1.00	0.12	0.88	1.00	1.00	1.00	1.00	3.00	1.00	1.00	3.00	1.00
Final Sat.:	1700	213	1488	1700	1700	1700	1700	5100	1700	1700	5100	1700
Capacity Analysis Module:												
Vol/Sat:	0.05	0.00	0.00	0.02	0.00	0.05	0.01	0.41	0.02	0.01	0.34	0.01
Crit Moves:	****					****		****		****		

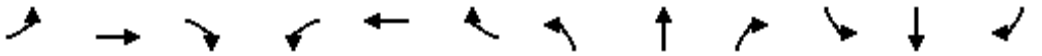
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Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	SBL	SBT	SBR
Lane Configurations											
Traffic Volume (vph)	24	2104	33	9	1755	9	86	1	31	2	80
Future Volume (vph)	24	2104	33	9	1755	9	86	1	31	2	80
Turn Type	Prot	NA	Perm	Prot	NA	Perm	Perm	NA	Perm	NA	Perm
Protected Phases	5	2		1	6			8		4	
Permitted Phases			2			6	8		4		4
Detector Phase	5	2	2	1	6	6	8	8	4	4	4
Switch Phase											
Minimum Initial (s)	5.0	10.0	10.0	5.0	10.0	10.0	10.0	10.0	10.0	10.0	10.0
Minimum Split (s)	9.6	22.8	22.8	9.6	22.8	22.8	40.6	40.6	40.6	40.6	40.6
Total Split (s)	11.0	77.0	77.0	11.0	77.0	77.0	42.0	42.0	42.0	42.0	42.0
Total Split (%)	8.5%	59.2%	59.2%	8.5%	59.2%	59.2%	32.3%	32.3%	32.3%	32.3%	32.3%
Yellow Time (s)	3.6	4.8	4.8	3.6	4.8	4.8	3.6	3.6	3.6	3.6	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.8	5.8	4.6	5.8	5.8	4.6	4.6	4.6	4.6	4.6
Lead/Lag	Lead	Lag	Lag	Lead	Lag	Lag					
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes	Yes					
Recall Mode	None	C-Max	C-Max	None	C-Max	C-Max	None	None	None	None	None
Act Effct Green (s)	6.5	95.4	95.4	5.6	90.5	90.5	21.9	21.9	21.9	21.9	21.9
Actuated g/C Ratio	0.05	0.73	0.73	0.04	0.70	0.70	0.17	0.17	0.17	0.17	0.17
v/c Ratio	0.34	0.69	0.04	0.14	0.61	0.01	0.45	0.04	0.16	0.01	0.29
Control Delay	70.4	14.1	2.0	64.0	14.9	0.0	52.0	19.6	42.5	36.0	9.3
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	70.4	14.1	2.0	64.0	14.9	0.0	52.0	19.6	42.5	36.0	9.3
LOS	E	B	A	E	B	A	D	B	D	D	A
Approach Delay		14.6			15.0			49.2		18.9	
Approach LOS		B			B			D		B	

Intersection Summary	
Cycle Length: 130	
Actuated Cycle Length: 130	
Offset: 0 (0%), Referenced to phase 2:EBT and 6:WBT, Start of Yellow	
Natural Cycle: 110	
Control Type: Actuated-Coordinated	
Maximum v/c Ratio: 0.69	
Intersection Signal Delay: 15.7	Intersection LOS: B
Intersection Capacity Utilization 67.1%	ICU Level of Service C
Analysis Period (min) 15	

Splits and Phases: 1: Douglas Dr. & Katella Av.





Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	24	2104	33	9	1755	9	86	1	7	31	2	80
Future Volume (veh/h)	24	2104	33	9	1755	9	86	1	7	31	2	80
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		0.98	1.00		0.98	1.00		1.00	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adj Flow Rate, veh/h	27	2364	31	10	1972	10	97	1	4	35	2	56
Peak Hour Factor	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	39	3613	1097	19	3556	1080	170	28	112	173	161	134
Arrive On Green	0.02	0.78	0.78	0.01	0.77	0.77	0.09	0.09	0.09	0.09	0.09	0.09
Sat Flow, veh/h	1619	4641	1409	1619	4641	1410	1223	297	1189	1283	1700	1420
Grp Volume(v), veh/h	27	2364	31	10	1972	10	97	0	5	35	2	56
Grp Sat Flow(s),veh/h/ln	1619	1547	1409	1619	1547	1410	1223	0	1486	1283	1700	1420
Q Serve(g_s), s	2.2	29.9	0.6	0.8	22.5	0.2	10.2	0.0	0.4	3.3	0.1	4.8
Cycle Q Clear(g_c), s	2.2	29.9	0.6	0.8	22.5	0.2	10.3	0.0	0.4	3.7	0.1	4.8
Prop In Lane	1.00		1.00	1.00		1.00	1.00		0.80	1.00		1.00
Lane Grp Cap(c), veh/h	39	3613	1097	19	3556	1080	170	0	141	173	161	134
V/C Ratio(X)	0.70	0.65	0.03	0.53	0.55	0.01	0.57	0.00	0.04	0.20	0.01	0.42
Avail Cap(c_a), veh/h	80	3613	1097	80	3556	1080	406	0	428	420	489	409
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	63.0	6.5	3.3	63.9	6.2	3.6	58.0	0.0	53.5	55.2	53.4	55.5
Incr Delay (d2), s/veh	8.1	0.9	0.0	8.3	0.6	0.0	3.0	0.0	0.1	0.6	0.0	2.1
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.0	7.5	0.2	0.4	5.8	0.1	3.3	0.0	0.2	1.1	0.1	1.8
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	71.0	7.4	3.3	72.2	6.8	3.6	61.0	0.0	53.6	55.7	53.4	57.5
LnGrp LOS	E	A	A	E	A	A	E	A	D	E	D	E
Approach Vol, veh/h		2422			1992			102			93	
Approach Delay, s/veh		8.1			7.1			60.7			56.8	
Approach LOS		A			A			E			E	

Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	6.1	107.0		16.9	7.7	105.4		16.9				
Change Period (Y+Rc), s	4.6	5.8		4.6	4.6	5.8		4.6				
Max Green Setting (Gmax), s	6.4	71.2		37.4	6.4	71.2		37.4				
Max Q Clear Time (g_c+I1), s	2.8	31.9		6.8	4.2	24.5		12.3				
Green Ext Time (p_c), s	0.0	26.8		0.3	0.0	22.5		0.3				

Intersection Summary			
HCM 6th Ctrl Delay		9.8	
HCM 6th LOS		A	

Goodman Commerce Center (JN 15593)
Opening Year (2025) With Project WITH IMPROVEMENTS
PM Peak Hour

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Future Volume Alternative)

Intersection #1 Douglas Dr. & Katella Av.

Cycle (sec):	100	Critical Vol./Cap.(X):	0.565
Loss Time (sec):	5	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	27	Level Of Service:	A

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	1 0	0 1	0	1 0	1 0	1	1 0	3 0	1	1 0	2 1	0
Volume Module:												
Base Vol:	86	1	7	27	2	69	18	2104	33	9	1755	6
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	86	1	7	27	2	69	18	2104	33	9	1755	6
Added Vol:	0	0	0	4	0	11	6	0	0	0	0	3
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	86	1	7	31	2	80	24	2104	33	9	1755	9
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	86	1	7	31	2	80	24	2104	33	9	1755	9
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	86	1	7	31	2	80	24	2104	33	9	1755	9
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	86	1	7	31	2	80	24	2104	33	9	1755	9
Saturation Flow Module:												
Sat/Lane:	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	1.00	0.12	0.88	1.00	1.00	1.00	1.00	3.00	1.00	1.00	2.98	0.02
Final Sat.:	1700	213	1488	1700	1700	1700	1700	5100	1700	1700	5074	26
Capacity Analysis Module:												
Vol/Sat:	0.05	0.00	0.00	0.02	0.00	0.05	0.01	0.41	0.02	0.01	0.35	0.35
Crit Moves:	****					****		****		****		

Traffix 8.0.0715 (c) 2008 Dowling Assoc. Licensed to URBAN CROSSROADS, IRVINE

Intersection	
Intersection Delay, s/veh	7.9
Intersection LOS	A

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	4	8	121	2	2	6	3	29	5	10	0
Future Vol, veh/h	0	4	8	121	2	2	6	3	29	5	10	0
Peak Hour Factor	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75
Heavy Vehicles, %	0	0	0	0	0	0	0	0	0	0	0	0
Mvmt Flow	0	5	11	161	3	3	8	4	39	7	13	0
Number of Lanes	0	1	0	0	1	0	0	1	0	0	1	0

Approach	EB	WB	NB	SB
Opposing Approach	WB	EB	SB	NB
Opposing Lanes	1	1	1	1
Conflicting Approach Left	SB	NB	EB	WB
Conflicting Lanes Left	1	1	1	1
Conflicting Approach Right	NB	SB	WB	EB
Conflicting Lanes Right	1	1	1	1
HCM Control Delay	6.9	8.3	7.1	7.5
HCM LOS	A	A	A	A

Lane	NBLn1	EBLn1	WBLn1	SBLn1
Vol Left, %	16%	0%	97%	33%
Vol Thru, %	8%	33%	2%	67%
Vol Right, %	76%	67%	2%	0%
Sign Control	Stop	Stop	Stop	Stop
Traffic Vol by Lane	38	12	125	15
LT Vol	6	0	121	5
Through Vol	3	4	2	10
RT Vol	29	8	2	0
Lane Flow Rate	51	16	167	20
Geometry Grp	1	1	1	1
Degree of Util (X)	0.055	0.017	0.195	0.025
Departure Headway (Hd)	3.908	3.749	4.219	4.43
Convergence, Y/N	Yes	Yes	Yes	Yes
Cap	922	942	848	813
Service Time	1.908	1.824	2.255	2.431
HCM Lane V/C Ratio	0.055	0.017	0.197	0.025
HCM Control Delay	7.1	6.9	8.3	7.5
HCM Lane LOS	A	A	A	A
HCM 95th-tile Q	0.2	0.1	0.7	0.1

Intersection	
Int Delay, s/veh	2.2

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	109	3	43	105	2	5	0	16	7	1	0
Future Vol, veh/h	0	109	3	43	105	2	5	0	16	7	1	0
Conflicting Peds, #/hr	0	0	0	0	0	0	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	100	-	-	100	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	1	-	-	1	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	63	63	63	63	63	63	63	63	63	63	63	63
Heavy Vehicles, %	0	0	0	0	0	0	0	0	0	0	0	0
Mvmt Flow	0	173	5	68	167	3	8	0	25	11	2	0

Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	170	0	0	178	0	0	482	482	176	493	483	169
Stage 1	-	-	-	-	-	-	176	176	-	305	305	-
Stage 2	-	-	-	-	-	-	306	306	-	188	178	-
Critical Hdwy	4.1	-	-	4.1	-	-	7.1	6.5	6.2	7.1	6.5	6.2
Critical Hdwy Stg 1	-	-	-	-	-	-	6.1	5.5	-	6.1	5.5	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.1	5.5	-	6.1	5.5	-
Follow-up Hdwy	2.2	-	-	2.2	-	-	3.5	4	3.3	3.5	4	3.3
Pot Cap-1 Maneuver	1420	-	-	1410	-	-	498	487	872	490	486	880
Stage 1	-	-	-	-	-	-	831	757	-	709	666	-
Stage 2	-	-	-	-	-	-	708	665	-	818	756	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	1420	-	-	1410	-	-	479	464	872	458	463	880
Mov Cap-2 Maneuver	-	-	-	-	-	-	551	521	-	536	511	-
Stage 1	-	-	-	-	-	-	831	757	-	709	634	-
Stage 2	-	-	-	-	-	-	672	633	-	794	756	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	0	2.2	9.9	11.9
HCM LOS			A	B

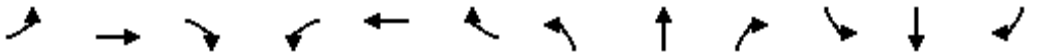
Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1
Capacity (veh/h)	766	1420	-	-	1410	-	-	533
HCM Lane V/C Ratio	0.044	-	-	-	0.048	-	-	0.024
HCM Control Delay (s)	9.9	0	-	-	7.7	-	-	11.9
HCM Lane LOS	A	A	-	-	A	-	-	B
HCM 95th %tile Q(veh)	0.1	0	-	-	0.2	-	-	0.1

Lane Group	EBL	EBT	WBL	WBT	NBL	NBT	SBL	SBT
Lane Configurations								
Traffic Volume (vph)	232	0	169	31	16	2061	54	1582
Future Volume (vph)	232	0	169	31	16	2061	54	1582
Turn Type	Perm	NA	Perm	NA	Prot	NA	Prot	NA
Protected Phases		4		8	5	2	1	6
Permitted Phases	4		8					
Detector Phase	4	4	8	8	5	2	1	6
Switch Phase								
Minimum Initial (s)	10.0	10.0	10.0	10.0	5.0	10.0	5.0	10.0
Minimum Split (s)	37.6	37.6	14.6	14.6	9.6	22.8	9.6	22.8
Total Split (s)	50.0	50.0	50.0	50.0	11.0	69.0	11.0	69.0
Total Split (%)	38.5%	38.5%	38.5%	38.5%	8.5%	53.1%	8.5%	53.1%
Yellow Time (s)	3.6	3.6	3.6	3.6	3.6	4.8	3.6	4.8
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	4.6	4.6	4.6	4.6	5.8	4.6	5.8
Lead/Lag					Lead	Lag	Lead	Lag
Lead-Lag Optimize?					Yes	Yes	Yes	Yes
Recall Mode	None	None	None	None	None	C-Max	None	C-Max
Act Effct Green (s)	45.4	45.4	45.4	45.4	5.7	65.4	6.2	69.8
Actuated g/C Ratio	0.35	0.35	0.35	0.35	0.04	0.50	0.05	0.54
v/c Ratio	1.46	0.19	0.44	0.72	0.24	0.93	0.73	0.68
Control Delay	268.9	5.7	36.8	35.5	68.0	38.7	106.6	24.5
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	268.9	5.7	36.8	35.5	68.0	38.7	106.6	24.5
LOS	F	A	D	D	E	D	F	C
Approach Delay		188.7		35.9		39.0		27.1
Approach LOS		F		D		D		C

Intersection Summary	
Cycle Length: 130	
Actuated Cycle Length: 130	
Offset: 0 (0%), Referenced to phase 2:NBT and 6:SBT, Start of Yellow	
Natural Cycle: 110	
Control Type: Actuated-Coordinated	
Maximum v/c Ratio: 1.46	
Intersection Signal Delay: 45.0	Intersection LOS: D
Intersection Capacity Utilization 104.3%	ICU Level of Service G
Analysis Period (min) 15	

Splits and Phases: 4: Valley View St. & Plaza Dr./Chip Av.





Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	232	0	102	169	31	369	16	2061	12	54	1582	40
Future Volume (veh/h)	232	0	102	169	31	369	16	2061	12	54	1582	40
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		0.98	1.00		0.97
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adj Flow Rate, veh/h	242	0	86	176	32	325	17	2147	12	56	1648	39
Peak Hour Factor	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	185	0	503	422	46	464	29	2344	13	70	2413	57
Arrive On Green	0.35	0.00	0.35	0.35	0.35	0.35	0.02	0.49	0.49	0.04	0.52	0.52
Sat Flow, veh/h	931	0	1439	1191	131	1330	1619	4762	27	1619	4660	110
Grp Volume(v), veh/h	242	0	86	176	0	357	17	1395	764	56	1094	593
Grp Sat Flow(s),veh/h/ln	931	0	1439	1191	0	1461	1619	1547	1695	1619	1547	1677
Q Serve(g_s), s	18.0	0.0	5.4	15.6	0.0	27.4	1.4	54.2	54.2	4.5	34.3	34.3
Cycle Q Clear(g_c), s	45.4	0.0	5.4	21.0	0.0	27.4	1.4	54.2	54.2	4.5	34.3	34.3
Prop In Lane	1.00		1.00	1.00		0.91	1.00		0.02	1.00		0.07
Lane Grp Cap(c), veh/h	185	0	503	422	0	510	29	1523	834	70	1602	868
V/C Ratio(X)	1.31	0.00	0.17	0.42	0.00	0.70	0.60	0.92	0.92	0.80	0.68	0.68
Avail Cap(c_a), veh/h	185	0	503	422	0	510	80	1523	834	80	1602	868
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	58.7	0.0	29.3	36.5	0.0	36.4	63.4	30.5	30.5	61.7	23.4	23.4
Incr Delay (d2), s/veh	173.3	0.0	0.2	0.7	0.0	4.2	7.1	10.1	16.4	34.3	2.4	4.3
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	15.1	0.0	1.9	4.7	0.0	10.4	0.6	20.9	24.4	2.5	12.2	13.8
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	232.0	0.0	29.4	37.2	0.0	40.7	70.5	40.6	47.0	95.9	25.8	27.7
LnGrp LOS	F	A	C	D	A	D	E	D	D	F	C	C
Approach Vol, veh/h		328			533			2176			1743	
Approach Delay, s/veh		178.9			39.5			43.1			28.7	
Approach LOS		F			D			D			C	

Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	10.2	69.8		50.0	6.9	73.1		50.0				
Change Period (Y+Rc), s	4.6	5.8		4.6	4.6	5.8		4.6				
Max Green Setting (Gmax), s	6.4	63.2		45.4	6.4	63.2		45.4				
Max Q Clear Time (g_c+I1), s	6.5	56.2		47.4	3.4	36.3		29.4				
Green Ext Time (p_c), s	0.0	5.9		0.0	0.0	12.9		2.9				

Intersection Summary			
HCM 6th Ctrl Delay		46.8	
HCM 6th LOS		D	

Goodman Commerce Center (JN 15593)
Opening Year (2025) With Project
PM Peak Hour

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Future Volume Alternative)

Intersection #4 Valley View St. & Plaza Dr.

Cycle (sec):	100	Critical Vol./Cap.(X):	0.860
Loss Time (sec):	5	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	68	Level Of Service:	D

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Protected			Protected			Permitted			Permitted		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	1 0	2	1 0	1 0	2	1 0	1 0	0	1 0	1 0	0	1 0
Volume Module:												
Base Vol:	16	2061	12	54	1582	37	226	0	102	169	31	369
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	16	2061	12	54	1582	37	226	0	102	169	31	369
Added Vol:	0	0	0	0	0	3	6	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	16	2061	12	54	1582	40	232	0	102	169	31	369
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	16	2061	12	54	1582	40	232	0	102	169	31	369
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	16	2061	12	54	1582	40	232	0	102	169	31	369
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	16	2061	12	54	1582	40	232	0	102	169	31	369
Saturation Flow Module:												
Sat/Lane:	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	1.00	2.98	0.02	1.00	2.93	0.07	1.00	0.00	1.00	1.00	0.08	0.92
Final Sat.:	1700	5070	30	1700	4974	126	1700	0	1700	1700	132	1568
Capacity Analysis Module:												
Vol/Sat:	0.01	0.41	0.41	0.03	0.32	0.32	0.14	0.00	0.06	0.10	0.24	0.24
Crit Moves:		****			****			****			****	

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APPENDIX 6.3: FUTURE YEAR (2025) WITHOUT PROJECT CONDITIONS TRAFFIC SIGNAL WARRANT ANALYSIS WORKSHEETS

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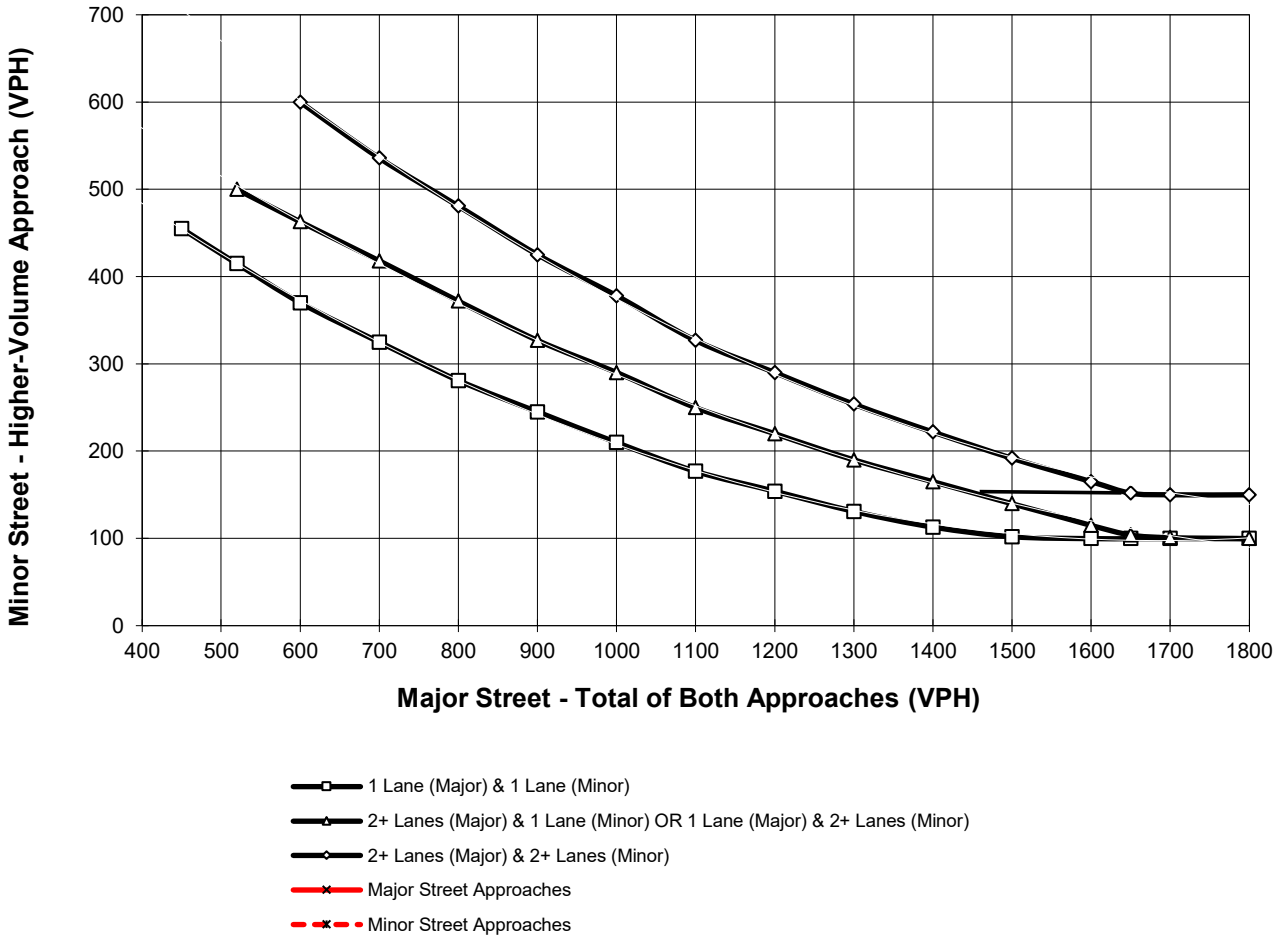
Figure 4C-3. Warrant 3, Peak Hour

Traffic Conditions = **2025 Without Project Conditions - Weekday AM Peak Hour**

Major Street Name = **Plaza Dr.**
Total of Both Approaches (VPH) = **65**
Number of Approach Lanes on Major Street = **1**

Minor Street Name = **Douglas Dr.**
High Volume Approach (VPH) = **43**
Number of Approach Lanes On Minor Street = **1**

SIGNAL WARRANT NOT SATISFIED



*Note: 150 vph applies as the lower threshold for a minor-street approach with two or more lanes and 100 vph applies as the lower threshold for a minor-street approach with one lane

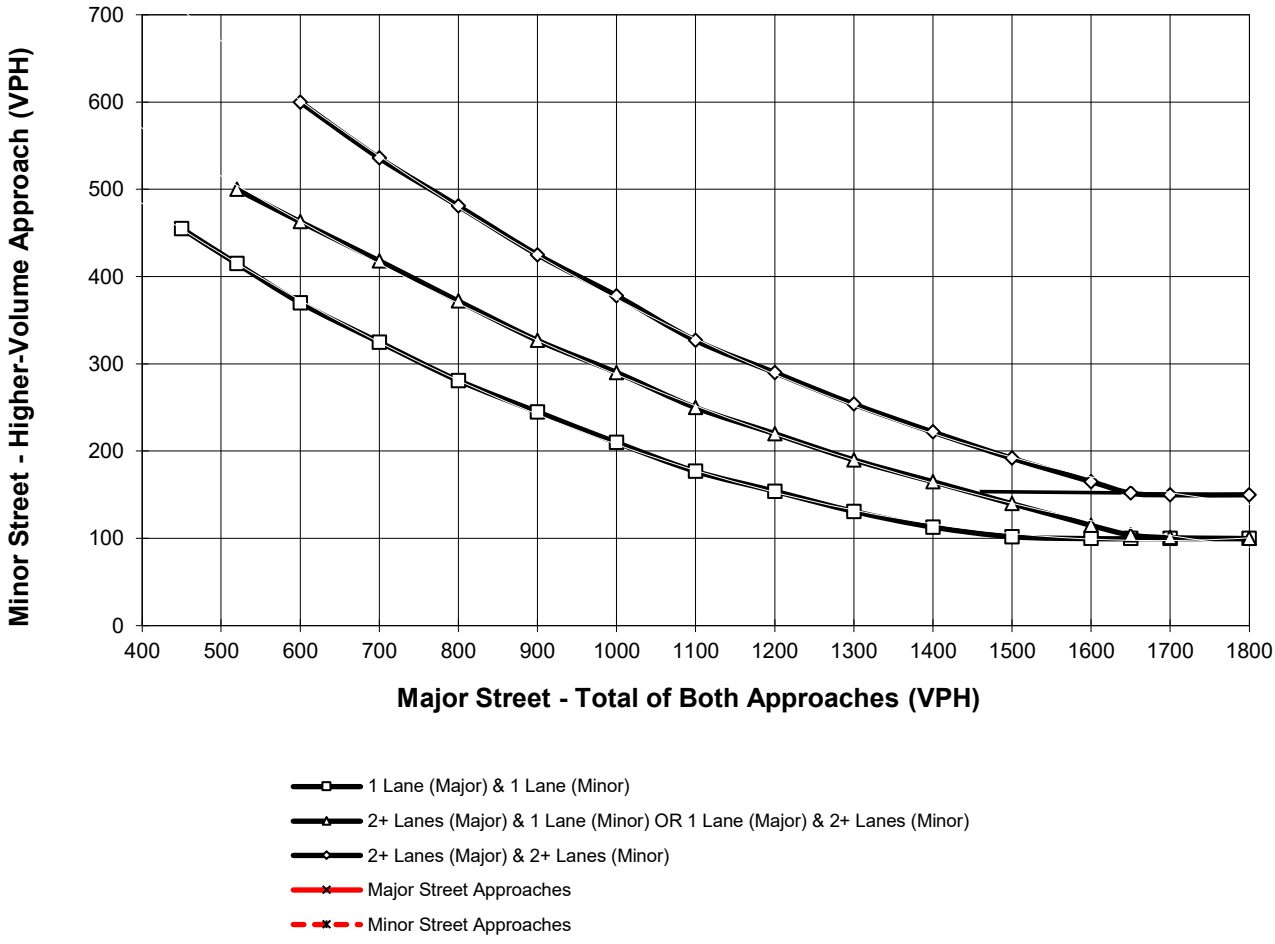
Figure 4C-3. Warrant 3, Peak Hour

Traffic Conditions = **2025 Without Project Conditions - Weekday PM Peak Hour**

Major Street Name = **Plaza Dr.**
Total of Both Approaches (VPH) = **252**
Number of Approach Lanes on Major Street = **1**

Minor Street Name = **McDonnell Dr.**
High Volume Approach (VPH) = **21**
Number of Approach Lanes On Minor Street = **1**

SIGNAL WARRANT NOT SATISFIED



*Note: 150 vph applies as the lower threshold for a minor-street approach with two or more lanes and 100 vph applies as the lower threshold for a minor-street approach with one lane

APPENDIX 6.4: FUTURE YEAR (2025) WITH PROJECT CONDITIONS TRAFFIC SIGNAL WARRANT ANALYSIS WORKSHEETS

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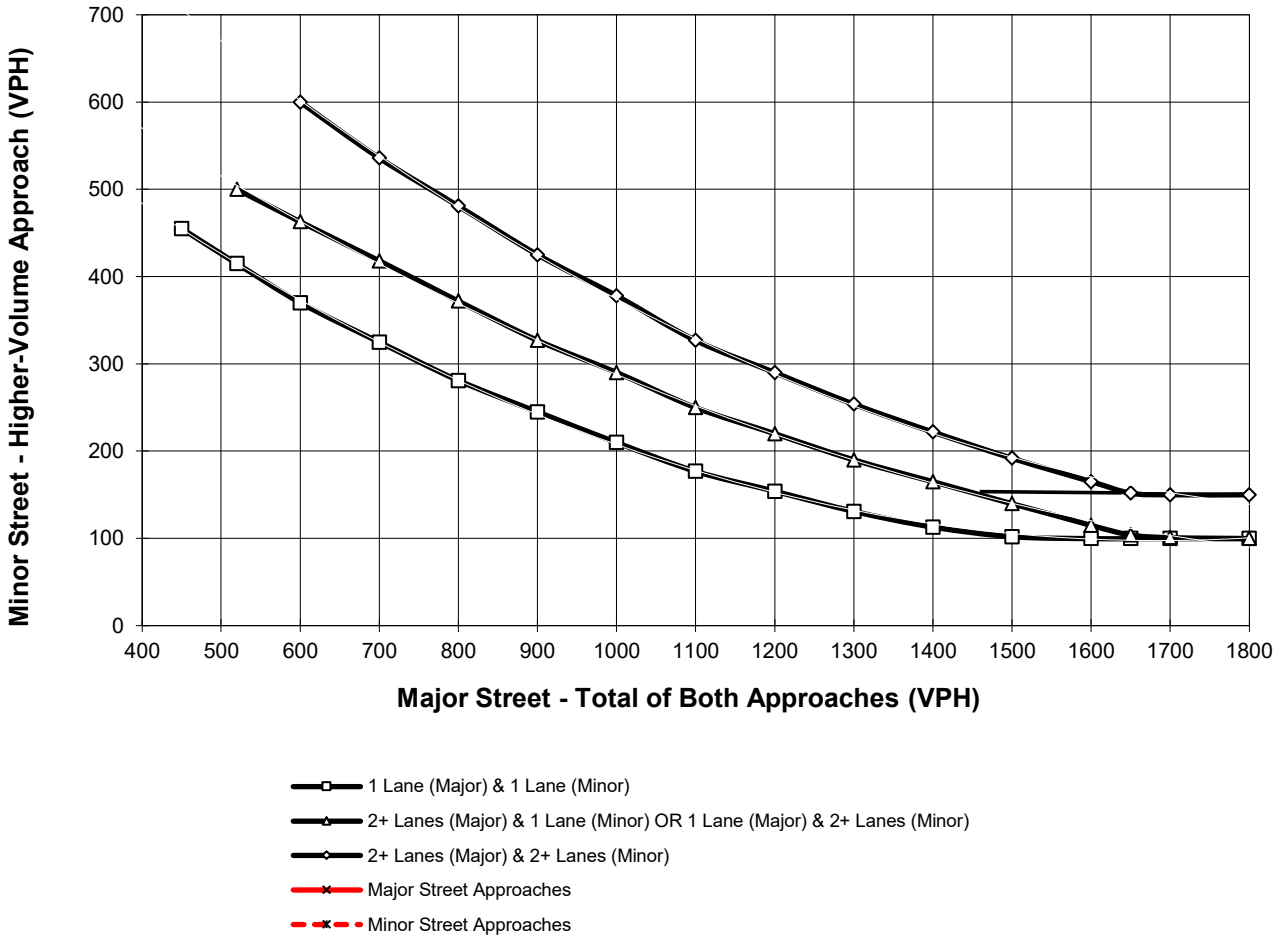
Figure 4C-3. Warrant 3, Peak Hour

Traffic Conditions = **2025 With Project Conditions - Weekday AM Peak Hour**

Major Street Name = **Plaza Dr.**
Total of Both Approaches (VPH) = **80**
Number of Approach Lanes on Major Street = **1**

Minor Street Name = **Douglas Dr.**
High Volume Approach (VPH) = **56**
Number of Approach Lanes On Minor Street = **1**

SIGNAL WARRANT NOT SATISFIED



*Note: 150 vph applies as the lower threshold for a minor-street approach with two or more lanes and 100 vph applies as the lower threshold for a minor-street approach with one lane

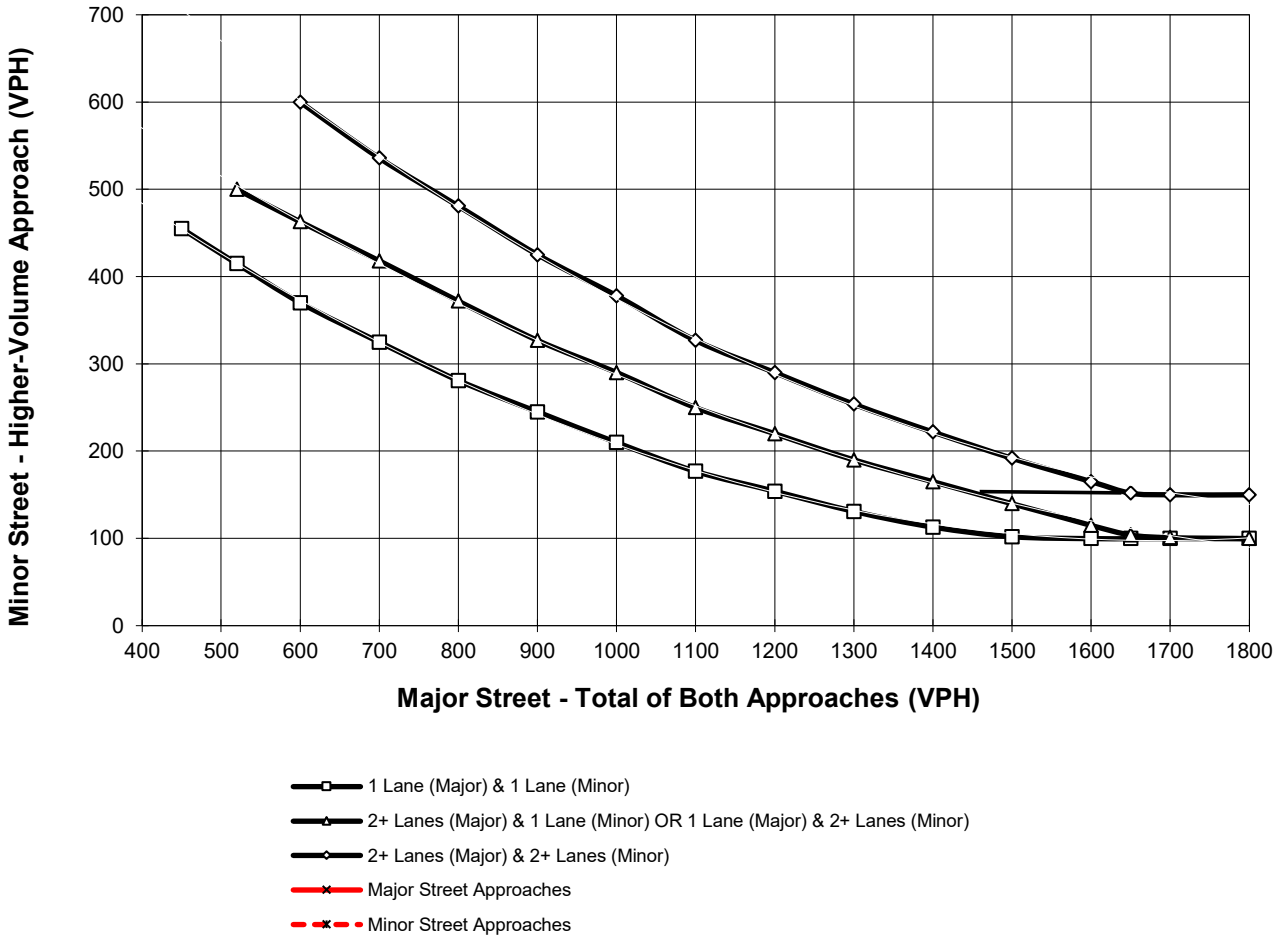
Figure 4C-3. Warrant 3, Peak Hour

Traffic Conditions = **2025 With Project Conditions - Weekday PM Peak Hour**

Major Street Name = **Plaza Dr.**
Total of Both Approaches (VPH) = **253**
Number of Approach Lanes on Major Street = **1**

Minor Street Name = **McDonnell Dr.**
High Volume Approach (VPH) = **21**
Number of Approach Lanes On Minor Street = **1**

SIGNAL WARRANT NOT SATISFIED



*Note: 150 vph applies as the lower threshold for a minor-street approach with two or more lanes and 100 vph applies as the lower threshold for a minor-street approach with one lane

MEMORANDUM

URBAN | CROSSROADS



DATE: February 20, 2024
TO: Alicia Velasco, City of Cypress
FROM: Charlene So, Urban Crossroads, Inc.
JOB NO: 15593-06 TG Memo

GOODMAN COMMERCE CENTER TRIP GENERATION ASSESSMENT

Urban Crossroads, Inc. is pleased to provide the following Trip Generation Assessment that has been prepared for the Goodman Commerce Center development (referred to as Project), which is located at 5665 Plaza Drive in the City of Cypress. Specifically, the following trip generation assessment compares the Project to the existing 150,626 square foot office building assuming 100% occupancy.

BACKGROUND

For the purposes of the Goodman Commerce Center Traffic Analysis (dated January 11, 2024. Referred to as the 2024 Traffic Study), the existing office building was approximately 41% occupied, but to not overstate existing credit for the office use and conduct a conservative analysis for the 2024 Traffic Study, it was assumed that only 25% of the building space was occupied to account for the existing tenants that could be underutilizing their space. However, current entitlements for the office building would allow for 100% occupancy of the existing building without any further discretionary action by the City. As such, the following trip generation assessment compares the proposed Project (as evaluated in the 2024 Traffic Study) to 100% occupancy of the existing 150,626 square foot office building.

PROJECT TRIP GENERATION

Table 1 summarizes the Project trip generation as evaluated in the 2024 Traffic Study. The proposed Project is anticipated to generate 406 two-way trips per day with 21 AM peak hour trips and 24 PM peak hour trips (actual vehicles). Intersection operations analysis for an industrial project must be evaluated using the passenger car equivalent (PCE) trip generation consistent with the City's Guidelines. As such, the Project's trip generation in PCE is also summarized in Table 1. The Project is anticipated to generate 604 two-way PCE trips per day with 29 PCE AM peak hour trips and 32 PCE PM peak hour trips.

TABLE 1: PROJECT TRIP GENERATION

			AM Peak Hour			PM Peak Hour			
Land Use	Quantity	Units[1]	In	Out	Total	In	Out	Total	Daily
Actual Vehicles:									
High-Cube Cold Storage Warehouse	191.394	TSF							
Passenger Cars:			15	1	16	4	14	18	262
2-axle Trucks:			1	1	2	1	1	2	50
3-axle Trucks:			0	0	0	0	0	0	16
4+-axle Trucks:			1	2	3	2	2	4	78
Total Truck Trips (Actual Vehicles):			2	3	5	3	3	6	144
Total Trips (Actual Vehicles)[2]			**17**	**4**	**21**	**7**	**17**	**24**	**406**
Passenger Car Equivalent (PCE):									
High-Cube Cold Storage Warehouse	191.394	TSF							
Passenger Cars:			15	1	16	4	14	18	262
2-axle Trucks:			1	2	3	1	2	3	76
3-axle Trucks:			0	1	1	1	0	1	32
4+-axle Trucks:			3	6	9	5	5	10	234
Total Truck Trips (PCE):			4	9	13	7	7	14	342
Total Trips (PCE)[2]			**19**	**10**	**29**	**11**	**21**	**32**	**604**

Note: Due to rounding, some of the numbers reflected in the table to not reflect actual calculated amounts.

[1] TSF = Thousand Square Feet

[2] Total = Passenger Cars + Trucks

EXISTING TRIP GENERATION

In an effort to understand the existing traffic associated with 100% occupancy of the existing office use, the trip generation rates used for this assessment are based upon information collected by the Institute of Transportation Engineers (ITE) as provided in their Trip Generation Manual (11th Edition, 2021). General Office (ITE Land Use Code 710) land use category has been used to calculate the trip generation for the existing 150,626 square feet of available office space. The trip generation summary illustrating daily, and peak hour trip generation estimates for the existing uses are shown in Table 2 along with the applicable trip generation rates. As shown in Table 2, 150,626 square feet of general office use generates a total of 1,634 two-way trips per day with 228 AM peak hour trips and 217 PM peak hour trips.

TABLE 2: EXISTING TRIP GENERATION

Land Use[1]	Units[2]	ITE LU Code	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
General Office (based on average rates)	TSF	710	1.34	0.18	1.52	0.24	1.20	1.44	10.84

Land Use	Quantity	Units[2]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
General Office[3]	150.626	TSF	201	27	228	37	180	217	1,634

[1] Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Eleventh Edition (2021).

[2] TSF = Thousand Square Feet

[3] 100% occupancy of the 150,626 square foot office building.

TRIP GENERATION COMPARISON

Table 3 shows the trip generation comparison between the proposed Project uses and the existing office use (assuming 100% occupancy). The resulting net change in trips is identified in Table 3. As shown, the proposed Project is anticipated to generate 1,030 fewer two-way PCE trips per day with 199 fewer PCE AM peak hour trips and 185 fewer PCE PM peak hour trips as compared to the existing office use (resulting in a net reduction).

TABLE 3: TRIP GENERATION COMPARISON

Land Use	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Proposed Project							
Passenger Cars:	15	1	16	4	14	18	262
Total Truck Trips (PCE):	4	9	13	7	7	14	342
Total Trips (PCE)	**19**	**10**	**29**	**11**	**21**	**32**	**604**
Existing Use: General Office							
Passenger Cars:	201	27	228	37	180	217	1,634
Total Truck Trips (PCE):	0	0	0	0	0	0	0
Total Trips (PCE)	**201**	**27**	**228**	**37**	**180**	**217**	**1,634**
Variance							
Passenger Cars:	-186	-26	-212	-33	-166	-199	-1,372
Total Truck Trips (PCE):	4	9	13	7	7	14	342
Total Trips (PCE)	**-182**	**-17**	**-199**	**-26**	**-159**	**-185**	**-1,030**

If you have any questions or comments, I can be reached at cso@urbanxroads.com.

Shea Properties®

November 6, 2024

City of Cypress
5275 Orange Avenue
Cypress, CA 90630

Dear Mayor Scott Minikus, City of Cypress Council Members, and Staff:

As a developer with a strong track record of building quality residential and commercial projects, Shea Properties has always been committed to creating vibrant communities that enhance the local area. Our focus on delivering thoughtful mixed-use spaces has contributed to the city's growth, and we remain dedicated to ensuring Cypress continues to thrive as a desirable place to live and work.

We are aware of Goodman's proposal to redevelop the property at 5665 Plaza Drive into a state-of-the-art Class A industrial facility. This project is a significant investment which will revitalize an under-utilized site and bring in new businesses. We believe that a strong and dynamic business environment and quality housing contribute to a balanced local economy. We support the Goodman's redevelopment effort at Plaza Drive.

Regards,

Sean McEachern
Vice President
Multifamily Development
Shea Properties

130 Vantis, Suite 200
Aliso Viejo, CA 92656
T: 949.389.7000 F: 949.389.7188
www.sheaproperties.com

CYPRESS
LAND COMPANY

November 7, 2024

City of Cypress – City Council
c/o Alicia Velasco – Planning Director
5275 Orange Avenue
Cypress, CA 90630

Dear Mayor Minikus, Council Members, and Staff,

As you know Cypress Land Company (CLC) has owned, developed, and operated many of the Business Park properties for several decades. As such, CLC greatly cares about maintaining high quality ownership and projects in the Business Park.

We understand that Goodman North America (GLC Cypress, LLC) has proposed to redevelop the property at 5665 Plaza Drive. The plan to replace the current underutilized office building with a new Class A industrial building which will be much better suited to meet the needs in the marketplace. Having buildings lay vacant for an extended time is not good for the health and vitality of the Business Park and therefore we support the change from office to industrial.

We have reviewed the proposed plans and conditions of approval and are sending this letter of support for approval of the proposed redevelopment.

Sincerely,

Matthew Doss
Chief Operating Officer
Cypress Land Company
10940 Wilshire Blvd Suite 1900
Los Angeles, CA 90024
310.208.8077

Cypress College
Foundation

November 7, 2024

Alisha Farnell
City Clerk
City of Cypress
5275 Orange Avenue
Cypress, CA 90630
afarnell@cypressca.org

Dear Ms. Farnell,

On behalf of the Cypress College Foundation, we would like to express our support for Goodman as a partner in the community. As an organization dedicated to meeting the needs of both our students and campus, we see tremendous value in the good work that Goodman does in the community.

The Cypress College Foundation sees the results of Goodman's work providing job opportunities for our students and future partnership possibilities that align with our mission. Their ongoing commitment to the community, demonstrated by their support of the Cypress College Foundation and other local organizations, further solidifies them as a valuable partner.

We believe that Goodman's projects will contribute to the long-term vitality of Cypress, strengthening the local economy while providing meaningful opportunities for education and workforce development. The Cypress College Foundation fully supports Goodman's efforts in the community.

Sincerely,

Howard Kummerman
Executive Director

GARRETT
STIEPEL RYDER LLP

Allyssa J. Holcomb
Direct Dial No.
(714) 384-4313
Email Address
aholcomb@garrettllp.com

November 12, 2024

VIA EMAIL (adm@cypressca.org)

City Council of the City of Cypress
5275 Orange Avenue
Cypress, CA 90630

Re: Warland Investments Company – Responses to Comments re Draft Environmental Impact Report for 5665 Plaza Drive, Cypress, California

Dear City Council Members:

This firm represents Warland Investments Company and affiliated entities (collectively, "**Warland**"). Enclosed is a comment letter regarding the above-referenced matter. For your convenience, below is an executive summary of the comments in the enclosed letter.

- As Lead Agency, it is the City's obligation under CEQA to determine the full scope of a proposed project, without relying solely on the word of the applicant. Here, there is substantial evidence the City either knew or *should have known* of Goodman's intent to redevelop 5665 Plaza Drive before **February 2023**, when the City published the IS/MND for the 2-building "Goodman Commerce Center" located next door at 5757 Plaza Drive, based on information that was publicly available and/or had been provided to the City, including the following:
  - In articles from the Orange County Business Journal and BizNow.com published in **October 2021**, Goodman discusses its plans to redevelop both 5665 and 5757 Plaza Drive for industrial purposes; in one article, a Goodman representative references a three (3) building campus of Class-A industrial space.
  - The City attached a geotechnical report dated **May 2022** to the 5757 Plaza Drive IS/MND, which describes the proposed redevelopment as "three (3) commercial/industrial buildings" located at 5665 and 5757 Plaza Drive.
  - In **July 2022**, the City first filed their traffic study request for 5665 Plaza Drive.
  - The outside lease expiration date for leases (both existing and advertised) at 5665 Plaza Drive was **October 31, 2022**, and all existing extension options would have expired months earlier.

- The City's election to nevertheless piecemeal the approvals for the 3-building industrial project and prepare separate environmental studies for 5665 and 5757 Plaza is prohibited under CEQA, since doing so obscures the **cumulative** environmental impacts of the project.

- In a number of its responses, the City does not sufficiently respond to the comment it addresses. Among other things, the City failed to:
    - Perform a quantitative health risk assessment, including an analysis of toxic air contaminants (TACs), as requested by Warland and SCAQMD;
    - Identify haul routes; and
    - Identify and analyze the use of Deep Dynamic Compaction (DDC) during construction.

- The City refuses to analyze the reasonably foreseeable use of 5665 and 5757 Plaza Drive as a logistics center and claims that such refusal is justified because such use is not currently permitted under the City's zoning regulations. However, as we have advised in previous letters, a use does **not** have to be permitted under current zoning regulations or otherwise formally approved by the Lead Agency to be evaluated as a potential future use. Goodman is a well-known logistics developer, this project mirrors other Goodman logistics centers in California, the large majority of Goodman's projects in California are used for logistics purposes, and the above-referenced articles regarding the project, which include interviews with a Goodman representative, heavily suggest that the intended use is logistics.

- The City also failed to satisfy Public Resources Codes 21092.5 and 21161, respectively, by posting the final EIR for 5665 Plaza Drive *less than 10 days* before the approval of the same was placed on a City Council agenda, and by failing to publish a Notice of Completion with the State Office of Planning and Research.

By approving this project without demanding that the City, as Lead Agency, perform proper cumulative environmental and traffic studies as required by CEQA, you would be doing so knowing that you do not have the full picture of the impacts of the overall project on the City. That not only exposes the City to litigation, but it also exposes the City's residents to potential – and as of now, *still avoidable* – harm.

We appreciate your time and consideration.

Regards,

Allyssa J. Holcomb

Enc.

GARRETT
STIEPEL RYDER LLP

Allyssa J. Holcomb
Direct Dial No.
(714) 384-4313
Email Address
aholcomb@garrettllp.com

November 12, 2024

VIA EMAIL (adm@cypressca.org)

City Council of the City of Cypress
5275 Orange Avenue
Cypress, CA 90630

Re: Warland Investments Company – Responses to Comments re Draft Environmental Impact Report for 5665 Plaza Drive, Cypress, California

Dear City Council Members:

As you know, this firm represents Warland Investments Company and affiliated entities (collectively, "**Warland**"). Warland submitted comments on September 27, 2024 regarding the Draft Environmental Impact Report prepared by the City with respect to 5665 Plaza Drive ("**5665 DEIR**"), along with numerous supporting documents, including peer review reports. The City published Final Environmental Impact Report Responses to Comments and Errata on November 4, 2024, which have been submitted to City Council for approval. While the City posted such responses to our detailed comments barely over a week ago, below are deficiencies in such responses as identified by Warland's environmental and traffic consultants on initial review:

Response to Comment IP-1-2

City's Claims re Lack of Awareness re 5665 Plaza Drive Redevelopment:

The City claims that, at the time of the preparation of the Initial Study for the redevelopment of 5757 Plaza Drive in **late 2022**, which led to the publication of the Initial Study and Mitigated Negative Declaration for 5757 Plaza Drive ("**5757 IS/MND**") in **February 2023**, the City was not aware of any plans by the applicant, Goodman, to redevelop 5665 Plaza Drive.

As an initial matter, the City, as Lead Agency, is obligated to do the proper diligence when evaluating a project application, but it appears that the City largely relied on the word of the applicant in this case, which does not constitute proper diligence. However, we also note that the following information was available to the public, and thus available to the City, *before the preparation* of the 5757 IS/MND:

- On **September 15, 2021**, Goodman acquired 5665 and 5757 Plaza Drive from the same party as a part of the same transaction pursuant to a single Grant Deed.
- In **October 2021**, Lang Cottrell, Goodman's Southwest Regional Director, was interviewed by both the Orange County Business Journal ("**OCBJ**") and BizNow.com ("**BizNow**") regarding Goodman's acquisition of 5665 and 5757 Plaza Drive. Copies of the articles are enclosed.
    - Per the OCBJ article published on **October 11, 2021**, Goodman expected to soon begin the entitlement process to redevelop the parcels into industrial uses. The article confirms

that the entitlement process could "ultimately change the size, scale and feasibility of the project." Mr. Cottrell also told OCBJ that "[t]his property is another example of Goodman's global strategy to provide strategic sies in gateway city locations *close to end consumers and logistics infrastructure*."[1]

- Per the BizNow article published on **October 20, 2021**, Mr. Cottrell expressly stated that Goodman was evaluating a possible redevelopment of the site with a **three-building campus of Class-A industrial space**. The article further states that "industry professionals" advised that people do not want to be close to *a last-mile-type site* and that *community pushback against them can complicate city approvals*.[2]

- On **May 4, 2022**, G3SoilWorks prepared the Geotechnical Investigation and Report ("**GeoTech Report**"), which described the project as a proposed **three (3) building project** to be located at 5665 and 5757 Plaza Drive. The GeoTech Report was published as Appendix C of the 5757 IS/MND[3] and Appendix F of the 5665 DEIR.[4]

> **PROJECT UNDERSTANDING**
>
> Three (3) commercial / industrial buildings are currently proposed across this project site, with each building including 1st and 2nd floor office areas and a warehouse with attendant loading docks and associated paved parking and driveway areas. A Concept Grading Plan (Reference No. 1) for the easterly 5757 property shows Building 1 (199,909 square feet) and Building 2 (180,359 square feet) occupying the easterly and westerly portions of the property. Conceptual plans for the 5665 property were not available at the time of this report, but we understand that Building 3 (185,412 square feet) will be of a similar type of construction (i.e., concrete tilt-up frame construction) with similar appurtenances relative to Buildings 1 / 2.

- In the City's Response to Comment IP-1-55, which is further addressed below, the City confirms that it first filed their traffic study request for 5665 Plaza Drive in **July 2022** (i.e., well before performing the Initial Study for 5757 Plaza Drive in late 2022 or publishing the 5757 IS/MND in **February 2023**).
- The City states that it was reasonable to assume that future development of 5665 Plaza Drive was purely speculative because (1) Goodman entered into a listing agreement with CBRE to market 5665 Plaza Drive for a short-term lease expiring no later than **September 30, 2022**, and (2) Toyo Tires, one of the tenants 5665 Plaza Drive at the time of Goodman's acquisition in September 2021, had two (2) extension options that *could* have extended its then-current lease term expiring **October 31, 2022**. These points actually should have led the City to the opposite conclusion (i.e., that no leases would still be in effect after October 31, 2022) due to the following:
  - The only reason to advertise for a short-term lease would be to collect income for a short-term period. This is not a "speculative" conclusion – it is a common sense one. Further, Mr. Cottrell specifically told BizNow, per the **October 20, 2021** article referenced above (which, again, was published and available to the City), that the then-existing buildings located at 5665 and 5757 Plaza Drive had leases in play for 6-12 months, which provided Goodman "cash flow" while it figured out how best to use the space.

---

[1] https://www.ocbj.com/news/weekly-news/goodman-pays-1283m-cypress-office-park/

[2] https://www.bisnow.com/los-angeles/news/industrial/industrial-office-goodman-rexford-black-creek-group-orange-county-south-bay-110619

[3] PwUJ4QgVDXEPsKoT0L_hZMBnb9vsq3-Pw97VJBfJrALmStd4LveCAKECZyOiDF5msPm2vXINPZSGeh0p0

[4] https://www.cypressca.org/home/showpublisheddocument/12821/638663325466130000

  - The CBRE listing alone should have told the City everything it needed to know about Goodman's plans for 5665 Plaza Drive, which is that it did not want any tenants in the building after **September 30, 2022**. In any event, at no point does the City claim that 5665 Plaza Drive was still occupied by any tenants in **late 2022**, when the City claims it began preparing the 5757 IS/MND.
  - Standard commercial leases always require prior written notice of the exercise of an extension option, and such notice is typically required at least nine (9) months before the expiration of the then-existing lease term. In this case, the Toyo Tires lease expired **October 31, 2022**, so both Goodman and the City would have known whether or not Toyo Tires had exercised its extension option MONTHS before the City began preparation of the 5757 Plaza Drive. *Further, the City could have and should have confirmed whether or not the extension had been exercised.*
- In its Response to Comment IP-1-2, the City itself acknowledges that the projects are "related" for purposes of analyzing cumulative environmental impacts.

Goodman has always made clear its intention to develop a three (3) building project at 5665 and 5757 Plaza Drive; however, Goodman was also keenly aware of the "community pushback" that their industrial developments attract. Further, the fact that the GeoTech Report described the project as a three (3) building development at 5665 and 5757 Plaza Drive, and the fact that the City had already ordered the traffic study for 5665 Plaza Drive *before* it began preparation of the 5757 IS/MND, confirm the City was well-aware of both Goodman's intention and the potential "community pushback" from the Cypress residents to the project. As such, the City claiming it relied on the word of the applicant when analyzing the project falls extremely short of the obligations of the City, as Lead Agency, under CEQA.

City's Claims of No Improper Piecemealing of Goodman Commerce Center Approvals

The City further claims that no improper piecemealing has occurred because the proposed building to be located at 5665 Plaza Drive can function independently of the two buildings at 5757 Plaza Drive, and proposes all necessary on-site and off-site improvements needed to ensure proper operation of the single building at 5665 Plaza Drive. The City notes that, because Goodman Commerce Center (i.e., 5757 Plaza Drive) was designed with its own accessways and driveways, and could operate independently, regardless of whether 5665 Plaza Drive was ever redeveloped, the projects *could* operate as standalone projects and the City was entitled to review them as such. However, the City's claim is not "supported by substantial evidence in the record."

The City relies on the two-prong test in *Laurel Heights Improvement Assn. v. Regents of University of California*, 47 Cal.3d 376, 396 (1988), which provides that "an EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects. Absent these two circumstances, the future expansion need not be considered in the EIR for the proposed project." The City claims the first prong of this test is not satisfied because the City was unaware of any plans by Goodman to redevelop 5665 Plaza Drive. It also argues that the plans Goodman submitted for the redevelopment of 5757 Plaza Drive showed a fully functional two warehouse configuration that "did not depend" on any additional development at 5665 Plaza Drive to operate and thus, the redevelopment of 5665 Plaza Drive was not a "reasonably foreseeable consequence" of the redevelopment of 5757 Plaza Drive.

In fact, the *Laurel Heights* case establishes the exact opposite conclusion. In that case, an EIR was partly **invalidated** because the EIR failed to discuss anticipated future uses of the proposed facility and its environmental impact.[5] The court determined that evidence of an existing lease with extension options was not enough to render the future use of the building to be purely speculative.[6] Rather, the court concluded that by the time it prepared the EIR, the applicant had either "made decisions or formulated reasonably definite proposals as to future uses of the building. **At a minimum, it is clear that the future expansion and the general types of future activity at the facility are reasonably foreseeable.**"[7]

In this case, the facts bear a striking resemblance to the facts of the *Laurel Heights* case. As detailed above, by the time the 5757 IS/MND was prepared, and certainly before it was published, Goodman (as applicant) had formulated reasonably definite proposals as to the future of the building, as established in the published articles and the GeoTech Report. Further, the future expansion and general types of future activity at 5665 Plaza Drive were reasonably foreseeable based on the above evidence, and the following:

- The redevelopment of 5665 Plaza Drive requires a lot line adjustment with 5757 Plaza Drive and includes the construction of a shared driveway that will provide shared access, so contrary to the City's reasoning, 5665 Plaza Drive cannot function independently of 5757 Plaza Drive;
- The three (3) buildings were designed as one project with a single site plan, which the City has published on its website both in separate parts and as a single site plan;
- The site plan originally published on the City's website for 5665 Plaza Drive labeled the building as "**Bldg. 3**", while the buildings on the 5757 Plaza Drive site plan published by the City were labeled "Building 1" and "Building 2";
- The safety assessment added in the Errata includes portions of a site plan that reverts the label of the building to be constructed at 5665 Plaza Drive to "BLDG. 3", which indicates, *at a minimum*, 5665 Plaza Drive is a planned expansion of 5757 Plaza Drive;
- Goodman's other developments in California consist of multiple warehouse buildings located adjacent to one another; and
- The design of the buildings to be constructed at 5665 and 5757 Plaza Drive mirrors other Goodman's logistics centers in California and were, in any event, clearly designed together as part of one overall project.

California Legislature intends CEQA to be interpreted broadly for the most stringent environmental protections and environmental studies are intended to evaluate "*past, present and reasonably anticipated future uses*."[8] Separate utilities alone do not mean the projects are wholly separate; otherwise, every development with multiple buildings (e.g., residential housing developments, shopping centers, etc.) would require a standalone environmental analysis of each building within the development.[9] This is an

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[5] *Laurel Heights Improvement Assn. v. Regents of University of California*, 47 Cal.3d 376, 396 (1988).
[6] *Id.*
[7] *Id.* at 397.
[8] Cal. Code Regs. tit. 14 §15130.
[9] The City relies on cases that are not properly applicable to the current case of improper piecemealing. In *McCann v. City of San Diego* (2021), the city separately considered two utility undergrounding projects because each project was independently functional. However, the environmental impacts and use of two utility undergrounding projects are incomparable to those of a three (3) building industrial campus. In *Banning Ranch Conservancy v. City of Newport Beach* (2012), a private party developed a residential housing development, and the City of Newport Beach developed a new park nearby which shared an access road. This case, in which two projects by separate parties with wholly different uses, is not similar to the current case, where a single applicant has purposefully designed a three-building site plan with a shared driveway and shared access to all three buildings and 75 dock doors.

absurd proposition and it runs contrary to the intent of CEQA, which demands that the Lead Agency evaluates the cumulative effects of a development, not just the separate standalone components of it.

At a minimum, once the City viewed the redevelopment of 5665 Plaza Drive as an "expansion" of 5757 Plaza Drive (which it does by its own admission), the environmental impacts of the entire three-building project would change significantly and require additional analysis. **There is no reasonable explanation as to why 5757 Plaza Drive is treated as a wholly separate project other than a desire to avoid performing a cumulative environmental impact analysis and/or the additional studies that would be demanded by such cumulative analyses**.

Response to Comment IP-1-33

The City's response does not sufficiently respond to Comment IP-1-33. Although the City contends that the project at 5665 Plaza Drive would not expose sensitive receptors to substantial levels of toxic air contaminants (TACs), there is no quantitative evidence that the redevelopment of 5665 Plaza Drive would not pose a health risk. Further, both Warland and South Coast Air Quality Management District ("**SCAQMD**") requested a quantitative health risk assessment ("**HRA**"), but the City did not respond to such request. The Errata must be corrected to include an HRA, which, among other things, includes an analysis of TAC emissions.

Response to Comment IP-1-43

The City's response does not sufficiently respond to Comment IP-1-43 because a haul route is not identified and hauling activities during construction are not directed to utilize a specific haul route. The Errata must be corrected to reflect the expected haul route.

Response to Comment IP-1-44

The City's response does not sufficiently respond to Comment IP-1-44 because the City provides that a crane is used in connection with deep dynamic compaction ("**DDC**"), so construction equipment is considered and the expected DDC activities should be described in the project description if the applicant intends to perform the same. The Errata must be corrected to reflect the use of DDC.

Response to Comment IP-1-52

The City's response does not sufficiently respond to Comment IP-1-52. Per the City's response, Comment IP-1-52 incorrectly assumed that the 30% adjustment factor, which was applied to the 2022 traffic counts to account for increased 2023 traffic, was applied to all turning movements. Instead, the City's Response to Comment IP-1-52 provides that the 30% adjustment factor was only applied to specific turning movements into and out of low occupancy office driveways, and it was not intended to apply to all or total traffic on the road. It seems that the adjustment factor was applied only to traffic occurring at two (2) of the four (4) studied intersections, which were located at (a) Douglas Drive/Driveway 2 and Driveway 1/Plaza Drive and (b) McDonnell Drive/Cara Way and Plaza Drive, and the City provides no explanation as to why the adjustment factor was not similarly applied to those certain turning movements at the intersections of Douglas Drive/Katella Avenue and Valley View/Plaza Drive. The Errata must be corrected to reflect these additional adjustments to 2022 traffic counts.

Response to Comment IP-1-56

The City's response does not sufficiently respond to Comment IP-1-56. The City does not provide an explanation as to why the High-Cube Warehouse ("**HCW**") Cold-Storage land use code was used, and then the City confusingly takes the position that the building would not "qualify" as a HCW based on it being less than 200,000 square feet, despite having used a HCW code for its analysis. The ITE does not state that a warehouse must be a minimum of 200,000 square feet to be considered an HCW, only that 200,000 square feet is a "typical" building size. Further, the building to be constructed at 5665 Plaza is 191,394 square feet, so the difference in size is negligible. In any event, together with the buildings at 5757 Plaza Drive, there is ***nearly 600,000 square feet*** of cumulative HCW space, which certainly qualifies for HCW designation. Arguing that this single building is too small to be considered an HCW only serves to avoid directly addressing the issue, so the City is again obscuring the overall nature and scope of the project. Without conditions prohibiting the use of the building as anything other than a HCW Cold-Storage use, as contemplated by the Goodman Commerce Center Traffic Analysis prepared by Urban Crossroads on November 21, 2023 ("**Traffic Study**"), the trip generation and associated impacts discussed in the 5665 DEIR could be substantially understated.

Further, since the HCW category applied by the City resulted in substantially lower trip generation than other, equally likely, HCW categories, the City failed to provide the decisionmakers with accurate information that would enable them to make a decision which intelligently takes account of the environmental consequences of a project.

Response to Comment IP-1-57

The City's response does not sufficiently respond to Comment IP-1-57. The "neighboring" Goodman Commerce Center, with "similar operational characteristics," had not been fully developed when the Traffic Study was published, so the City did not use available data for similar uses because the actual employee count at 5757 Plaza Drive was not yet available. The City must provide substantial evidence to support its decision to use the estimated employee count from the 5757 IS/MND.

Response to Comment IP-1-61

The City's response does not sufficiently respond to Comment IP-1-61 and the City again contradicts its own admissions in this response. The City argues that the inconsistent trip distribution patterns are warranted because the Goodman Commerce Center (i.e., 5757 Plaza Drive) and 5665 Plaza Drive are not constructed as the same type of warehouse nor is the primary access to the loading docks and the employee parking areas for the two projects the same. However, in its Response to Comment IP-1-57 above, the City specifically uses Goodman Commerce Center because the projects will have "*similar operational characteristics*". Additionally, 5665 and 5757 Plaza Drive will share an access driveway, so trucks will be able to access all three (3) buildings and access to the loading docks and the parking areas will be the same. 5757 Plaza Drive is also projected to include cold storage, so the City's Response to Comment IP-1-61 does not sufficiently explain the inconsistences.

Response to Comment IP-1-62

The City's response does not sufficiently respond to Comment IP-1-62. As mentioned in our previous letters, the Specific Plan Modernization project may allow City staff to permit uses that are currently impermissible. Environmental studies must evaluate "past, present, and *reasonably anticipated future*

uses."[10] The reasonably anticipated future uses do **not** have to be permitted under current zoning regulations or otherwise formally approved by the lead agency to be evaluated as a potential future use.[11] In this case, Goodman is a well-known logistics developer, this project mirrors other Goodman logistics centers in California, the large majority of Goodman's projects in California are used for logistics purposes, and the enclosed articles published in October 2021, which Goodman's representative is quoted in, heavily suggest that the intended use was logistics. Such use should have been thoroughly evaluated in the EIR.

Response to Comment IP-1-67

The City's response does not sufficiently respond to Comment IP-1-67. No change was made to Exhibit 1-11 in the Goodman Commerce Center Traffic Analysis (Urban Crossroads, January 11, 2024) ("**Updated Traffic Study**") nor in the new safety assessment. Note further that the 5665 DEIR exclusively refers to the Traffic Study, which is outdated. The Updated Traffic Study should instead be referenced.

Additional Comments

In addition to the deficiencies in the City's responses noted above, Public Resources Code 21092.5 requires a Lead Agency to provide written responses to state agency comments at least 10 days prior to the Lead Agency's decision on the project. The City failed to satisfy this requirement by posting the final EIR for 5665 Plaza Drive *less than 10 days* before the City Council agendized its decision of this project. Further, the City failed to satisfy Public Resources Code 21161 because it failed to publish a Notice of Completion with the State Office of Planning and Research.

Conclusion

For the myriad reasons outlined in our prior correspondence, as well as in this letter, it is incumbent on you to disapprove of the 5665 Plaza Drive project and demand a new EIR that properly defines the project as 5665 and 5757 Plaza Drive and contemplates the likely logistics use of such project.

The City, as Lead Agency for purposes of CEQA, has a responsibility to be transparent with the residents in Cypress by providing a thorough informational EIR. By approving this project without demanding proper environmental and traffic studies as required by CEQA, you would be doing so knowing that you do not have the full picture of the impacts of the overall project on the City. That not only exposes the City to litigation, but it also exposes the City's residents to potential – and as of now, *still avoidable* – harm. Keep in mind that the residents elected you because they are relying on you to evaluate these projects and to make the right decisions on their behalf. We urge you to do so.

We appreciate your time and consideration.

Regards,

Allyssa J. Holcomb

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[10] Cal. Code Regs. tit. 14 §15130.
[11] *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.*, 47 Cal. 3d 376, 394 (1988).

Encs.

cc: City Clerk for the City of Cypress *(via email)*
Mr. Peter Grant, City Manager *(via email)*
Ms. Alicia Velasco, Planning Director *(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)*
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Lana H. Sammons, Esq. *(via email)*

Goodman Pays $128.3M For Cypress Office Park

BY STAFF-AUTHOR

OCTOBER 11, 2021

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Part of Cypress Technology Center

The local office of Goodman Group has bought one of the largest business parks in the city of Cypress, with an eye on redeveloping the site as a new industrial project, which contains a large amount of office space.

The Australia-based firm, a $26 billion-valued industrial investor and developer that operates its North American operations out of Irvine, recently paid $128.3 million for the Cypress Technology Center, a two-building campus on about 26 acres at 5757 and 5665 Plaza Drive.

The site is north of Katella Avenue, a few blocks from the Los Alamitos Race Course that's located in the city.

The five-story office component of the center, at 5665 Plaza Drive, runs about 150,000 square feet. The larger building at the site, at 5757 Plaza Drive, counts another 331,000 square feet of office and industrial space.

The properties were built about 30 years ago.

The campus' larger tenants include UnitedHealth Group, which has other buildings in the vicinity, as well as Trident University and Toyo Tires, according to CoStar Group Inc. records.

Tops in City

New York-based DRA Advisors LLC is the seller of the property, in what's the largest reported real estate deal in Cypress this year.

Goodman paid about $267 per square foot for the existing buildings at the campus, or about $110 per land square foot for the 26-acre site, which counts an abundant amount of surface parking space and is located in an area with a fair amount of industrial properties nearby.

"This property is another example of Goodman's global strategy to provide strategic sites in gateway city locations close to end consumers and logistics infrastructure," Lang Cottrell, regional director of the southwest region for Goodman Group US, told the Business Journal.

Cushman and Wakefield's Jeff Chiate, Rick Ellison, and Rusty Smith brokered the deal on behalf of the buyer and seller; CBRE's Tom Sheets was also involved in the transaction.

Office Conversions Continue

The new owners are expected to soon kick off the entitlement process to redevelop the two buildings into new industrial uses.

Goodman is “currently evaluating the property for an adaptive reuse or potential new redevelopment opportunity,” according to Cottrell.

The company declined to include specifics of the potential redevelopment; the entitlement process could ultimately change the size, scale and feasibility of the project. There are no records of the proposed project filed with the city yet.

It wouldn’t be the only example of an older area business park with office components getting reworked into a new industrial project.

Elsewhere in the city, just off Katella Avenuer, industrial developer Duke Realty plans a new last-mile distribution facility for Amazon on a portion of the former base of Mitsubishi Motors.

Last week’s Business Journal reported on L.A.-based Rexford Industrial paying close to $192 million for a trio of OC sites, including office campuses in Santa Ana and Orange, which it expects to eventually turn into industrial projects.

Busy Boulevard

Cypress has been a beacon for real estate investors of all types in recent months.

The multibillionaire owners of the Panda Express restaurant chain this summer paid $22 million for a nearby office building at 10810 Walker St., apparently as a personal investment for the family.

The Walker Street office is adjacent to a 7-acre site just off Katella Avenue that Irvine homebuilder Melia Homes bought for a new townhome project, dubbed Belmont.

The new community will hold 135 townhomes, and will go up on land that was once used for Los Alamitos Race Course’s overflow parking.

Melia paid a reported $30.3 million for the site, in a deal that closed in July.

Goodman’s Growth

Goodman is currently heading the largest industrial project on the books for Orange County: a 1.5 million-square-foot logistics campus at the former Kimberly-Clark tissue paper manufacturing site in Fullerton.

Construction is expected to be completed by spring 2022.

Goodman bought the site at the end of 2019 for $202 million.

Developers Eyeing Industrially Zoned Offices As Last-Mile Opportunities

October 20, 2021 | Bianca Barragán, Southern California (https://www.bisnow.com/author/bianca-barragn-350667) (mailto:bianca.barragan@bisnow.com)

A convergence of the bottom-up softening of certain parts of the office market, the white-hot demand for Class-A industrial space that is close to consumers and the lack of available space for that use has caused industrial developers to, at least temporarily, get into the office business.



Developers like Goodman (https://www.bisnow.com/tags/goodman), Rexford Industrial Realty (https://www.bisnow.com/tags/rexford-industrial-realty) and Black Creek Group (https://www.bisnow.com/tags/black-creek-group) are looking for and acquiring office space that is zoned industrial, even if it has tenants in it, with plans to replace those offices with new industrial space once leases are up.

Rexford spent roughly $105.3M on the Behr paint company headquarters in Santa Ana last month, the Orange County Business Journal reported (https://www.ocbj.com/news/2021/oct/04/office-parks-flux/), and $70M

on the Volt Campus (https://www.bisnow.com/orange-county/news/industrial/rexford-industrial-volt-orange-hines-oaktree-capital-logistics-110148) in the city of Orange in late August — both office properties with tenants with years left on their leases — with plans to turn both into industrial space.

“We had never really focused on doing office conversions before this pandemic,” Rexford Industrial Realty Executive Vice President of Investments and Acquisitions Patrick Schlehuber (https://www.bisnow.com/tags/patrick-schlehuber) told *Bisnow*.

In the past, industrial properties were getting purchased for office developments, because office was the higher-revenue use, Schlehuber said. That isn't always the case now.

Over the past decade, the demand for industrial space has been intense, especially spaces close to consumers that can fill in the so-called last mile of the e-commerce equation. But the coronavirus pandemic poured gasoline on the fire of industrial demand, RCLCO (https://www.bisnow.com/tags/rclco-real-estate-advisors) Managing Director of Strategic Consulting Eric Willett (https://www.bisnow.com/tags/eric-willett) said. Over the past two years, interest in any available parcel and weighing its potential for industrial usage has definitely increased, Willett said.

“The fact that the end user or the supplier of goods to the customer is wanting and needing to be closer to the population is leading groups like ourselves to look at these types of opportunities in a different way,” said Lang Cottrell (https://www.bisnow.com/tags/lang-cottrell), Southwest regional director for Goodman North America.

CRE professionals said that although this isn’t necessarily a new concept, these deals have become increasingly popular as the availability of land in these infill areas becomes ever scarcer, as the prices for industrial land rise, and as the strong demand for industrial space intersects with the weakening demand for certain kinds of office space.



In Orange County (https://www.bisnow.com/tags/orange-county), where a number of these deals have taken place, CBRE found the Q3 vacancy rate (https://www.cbre.com/insights/figures/orange-county-industrial-marketview-q3-2021) for industrial was 1.3% — a record low. Another record was set by the 2.3M SF of projects under construction "as developers respond to record low vacancy paired with insatiable demand from occupiers," the report's authors wrote.

In the South Bay area of LA County, where these deals are also playing out and where developers are looking for prospective spaces in Carson, Gardena and Torrance, the overall Q3 vacancy rate was 0.6%, CBRE reported (https://www.cbre.com/insights/figures/greater-los-angeles-industrial-marketview-q3-2021?utm_source=CampaignLogic&utm_medium=email&utm_campaign=GLA+Marketvi In LA overall, industrial and logistics capital markets are experiencing record activity, thanks to e-commerce (https://www.bisnow.com/tags/e-commerce) growth, CBRE said.

Office, especially outside of the highly amenitized low-rise campuses of the Westside and premier areas and trophy spaces, has not been experiencing the same boom. In Torrance, CBRE's Q3 count found office vacancy at 14% (https://www.cbre.com/insights/figures/los-angeles-office-marketview-q3-

2021?
utm_source=CampaignLogic&utm_medium=email&utm_campaign=GLA+Marketvi
but industrial vacancy at 0.3%

Cushman & Wakefield Capital Markets Group Vice Chair Jeff Cole (https://www.bisnow.com/tags/jeff-cole) said the market for low-rise commodity office buildings, like the ones that are favored in office-to-industrial transactions, has struggled significantly.

“The rates have gone down, vacancy has gone up and the alternative for that office owner is to try to re-lease the building in a very soft market or try to sell the building,” Cole said.

The pricing on those two choices is so much lower than what owners can expect if they sold to an industrial developer, so when the option arises, office owners bite.

“They invariably decide that it is a good alternative strategy for them to sell to an industrial developer,” Cole said.

There are some commonalities in what developers look for. Industrial zoning makes a property attractive, eliminating the hurdle of having to rezone the site, which can push out the timeline for industrial transformation.

South Bay areas that have lots of industrial space with offices mixed in or similar areas in North Orange County or South Orange County, where Lake Forest is, are ripe for these kinds of office-to-industrial transitions because the underlying properties are often zoned for industrial, Cole said.

A joint venture between Western Realco (https://www.bisnow.com/tags/western-realco) and RREEF Property Trust (https://www.bisnow.com/tags/rreef) snapped up four neighboring office buildings totaling about 222K SF in South Orange County’s Lake Forest in April. The JV plans to turn them into 240K SF of new Class-A industrial space once the office tenants have moved on. That same month, an adjacent roughly 145K SF office building in that same park sold to Black Creek Group for $34.9M, public records show.

Buyers with office-to-industrial plays in mind don't see tenants in the building as a hurdle. Though developers are definitely looking at how long they are slated to stay in the building, several of these deals included office buildings with long-term leases in place.

Goodman (https://www.bisnow.com/tags/goodman) purchased the Cypress Technology Center with a 330K SF industrial building on the site, but the remaining third of the site is occupied by a 150K SF office building. Both buildings have leases in play for six to 12 months, which provides Goodman some cash flow while it figures out how best to use the space, Cottrell said.

Location in an industrial area is ideal because then the new industrial use fits in. Infill sites are attractive because they are close to people, but those people don't always want to be close to a last-mile-type site. Several of the industry professionals who spoke to *Bisnow* mentioned the importance of being sensitive to the community throughout the planning phases of these projects, as community pushback against them can complicate city approvals.

Cottrell said that at the Cypress site, it is exploring whether it could adaptively reuse the property, which would help get it online faster and with less environmental impact. But it is also evaluating a possible redevelopment of the site with a three-building campus of Class-A industrial space.

While there are clearly a fair amount of these types of properties in infill areas where these deals make financial sense, it isn't a trend that will be cropping up in every neighborhood. Though these deals aren't confined to Orange County by any means, the economics that make office-to-industrial attractive don't work everywhere. In Culver City (https://www.bisnow.com/tags/culver-city), West LA (https://www.bisnow.com/tags/west-la) and other markets where tech, media and entertainment tenants are still attracted to office space (https://www.bisnow.com/los-angeles/news/office/los-angeles-office-sublease-space-110540), these types of deals don't pencil.

"These aren't happening in Playa Vista or Santa Monica," Cole said.

Contact Bianca Barragán at bianca.barragan@bisnow.com (mailto:bianca.barragan@bisnow.com)

See Also: Report: PREIT Sells Exton Square Mall To Developer With Plans For Mixed-Use Makeover (/philadelphia/news/commercial-real-estate/preit-sells-exton-square-mall-to-developer-with-plans-for-mixed-use-126690)

Related Topics: Patrick Schlehuber (https://www.bisnow.com/tags/patrick-schlehuber), Jeff Cole (https://www.bisnow.com/tags/jeff-cole), Western Realco (https://www.bisnow.com/tags/western-realco), RREEF Management (https://www.bisnow.com/tags/rreef-management), Goodman Group (https://www.bisnow.com/tags/goodman-group), Lang Cottrell (https://www.bisnow.com/tags/lang-

cottrell), Black Creek Group (https://www.bisnow.com/tags/black-creek-group), Eric Willett (https://www.bisnow.com/tags/eric-willett), Rexford Industrial Realty (https://www.bisnow.com/tags/rexford-industrial-realty)

CITY OF CYPRESS

CITY COUNCIL REPORT

City Council Special **4.**

FROM: Fred Galante, City Attorney

DATE: 11/18/2024

SUBJECT: **Approve a Resolution Adopting Procedural Requirements as Prerequisites for Any Council Member Wishing to Retain Separate Legal Counsel to Represent Them on City-Related Matters**

RECOMMENDATION

Approve a Resolution adopting procedural requirements as prerequisites for any Council Member wishing to retain separate legal counsel to represent them on City-related matters.

DISCUSSION

The City has experienced circumstances where a Council Member unilaterally retained separate legal counsel purportedly related to a City matter and thereafter sought reimbursement from the City for those legal fees. Allowing Council Members to unilaterally retain separate legal counsel and expose the City to any obligation to reimburse him/her for such fees is an improper use of City resources insofar as the City Council is the only body authorized to retain legal counsel, control legal expenses, mitigate legal risks to the City and approve the expenditure of funds. To address these circumstances, it is recommended that the City Council establish procedures for all Council Members to follow before they may retain separate legal counsel to address any City-related legal issues as a condition of the City having any legal obligation to consider any request for reimbursement of any legal fees. The recommended Resolution establishes these procedures, including:

- Providing a written explanation for the request
- Providing a budget for the legal representation
- City Council consideration of complete requests at a public meeting
- Ensuring the requested legal representation is sufficiently qualified and charges a reasonable rate
- Ensuring the legal representation is consistent with the City's interests and proceeds in a cost-effective manner

BUDGET IMPACT

None.

LEGAL REVIEW

The City Attorney prepared the recommended Resolution.

APPROVED BY: Peter Grant, City Manager

Attachments

Resolution

RESOLUTION NO. _____

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CYPRESS, AND ACTING AS EX-OFFICIO GOVERNING BOARD OF DIRECTORS OF THE CYPRESS RECREATION AND PARK DISTRICT, ADOPTING PROCEDURAL REQUIREMENTS AS PREREQUISITES FOR ANY COUNCIL MEMBER WISHING TO RETAIN SEPARATE LEGAL COUNSEL TO REPRESENT THEM ON CITY-RELATED MATTERS

RECITALS

WHEREAS, the City of Cypress has experienced circumstances where a City Council Member has unilaterally retained separate legal counsel purportedly related to a City matter and thereafter sought reimbursement from the City for those legal fees;

WHEREAS, allowing Council Members to unilaterally retain separate legal counsel and expose the City to any obligation to reimburse him/her for such fees is an improper use of City resources insofar as the City Council is the only body authorized to retain legal counsel, control legal expenses and any mitigate legal risks to the City; and

WHEREAS, for these reasons, it is necessary for the City Council to establish procedures for all Council Members to follow before they may retain separate legal counsel to address any City-related legal issues as a condition of the City having any legal obligation to consider any request for reimbursement of any legal fees in connection thereto.

NOW THEREFORE, The City Council of the City of Cypress hereby resolves as follows:

Section 1. The following prerequisites shall apply to any Council Member wishing to retain separate legal counsel to represent him/her related to any City matter, under any circumstance whether due to the Council Member being personally named in a lawsuit related to City business, fearing personal legal exposure, believing there is a risk of a conflict of interest in having the City's legal counsel represent the Council Member's interests, or any other reason. Fully complying with the following prerequisites shall be a condition to the City having any legal obligation to consider any request for reimbursement of any legal fees for a Council Member's separate legal counsel:

a. The Council Member wishing to retain separate legal counsel shall explain in writing to the City Manager the request to retain separate legal counsel to represent the Council Member's interests, including an explanation as to why the City Attorney is unable to handle the matter at issue, which explanation shall be sufficiently detailed for the City Manager to analyze the issue and confer with the City Attorney as the City Manager deems necessary. The City Manager shall have sole discretion to determine if the explanation is sufficient and may require the Council Member to provide additional information.
b. The request shall include a detailed background of the separate legal counsel the Council Member seeks to retain, that separate legal counsel's experience and expertise, hourly rates, and estimate of the legal fees anticipated to be incurred in the matter.

c. If the City Manager deems that the request contains all the information necessary to analyze the request, the City Manager shall present the request to the City Council, or to a City Council subcommittee established for the purpose of assessing the request.
d. After considering the request, and any recommendation from the City Manager, City Attorney and/or City Council subcommittee established for the purpose of assessing the request, the City Council shall consider the request, and in its sole discretion, may approve or reject the request by the Council Member for separate legal counsel or request additional information. Any approved request shall be subject to the hourly rates and may not exceed the amount of fees approved by the City Council.
e. If such legal representation is approved by the City Council, the Council Member shall provide copies of all legal invoices to the City Manager at the same time as they are provided to the Council Member by the City Council-approved separate legal counsel.
f. If the Council Member's City Council-approved separate legal representation exceeds the City Council-approved legal fees budget, the Council Member having retained the separate legal counsel must request additional funding following the process established in this Resolution.
g. The City Council-approved separate legal counsel shall confer with the City Attorney in a manner to assure the legal representation provided by such separate legal counsel is consistent with the City's interests and proceeds in a cost-effective manner, and does not pursue litigation tactics or actions not supported by the City Attorney or City Council. If the Council Member represented by City Council-approved separate legal counsel disagrees with the City Attorney's direction/decision in this regard, they may appeal to the City Council or to a City Council subcommittee established for the purpose of assessing the request.

Section 2. Any request by a Council Member for City Council approval of separate legal counsel shall only apply to matters that are directly related to City business. The City Council retains sole discretion to determine whether any request complies with this requirement.

Section 3. Notwithstanding any approval by the City Council of a Council Member's request for separate legal counsel, should the City Council find, in its sole discretion, that the Council Member's interest have diverged from those of the City or that the Council Member acted outside the scope of his/her duties as a Council Member, the City Council retains the right to terminate any approval granted under the authority granted herein and seek restitution of any legal fees paid by the City in connection with such approval.

Section 4. The City shall not be responsible for payment of any legal fees for an attorney retained by a Council Member that does not strictly comply with the requirements of this Resolution.

PASSED, APPROVED AND ADOPTED by the City Council of the City of Cypress, and acting as ex-officio governing Board of Directors of the Cypress Recreation and Park District, at a special meeting held on the ____ day of November 2024.

_____
MAYOR OF THE CITY OF CYPRESS

ATTEST:

_____
CITY CLERK OF THE CITY OF CYPRESS

STATE OF CALIFORNIA)
COUNTY OF ORANGE)

I, Alisha Farnell, City Clerk of the City of Cypress, DO HEREBY CERTIFY that the foregoing Resolution was duly adopted at a special meeting of the said City Council held on the ___ day of November 2024; by the following roll call vote:

AYES:	COUNCIL MEMBERS:
NOES:	COUNCIL MEMBERS:
ABSTENTION:	COUNCIL MEMBERS:
ABSENT:	COUNCIL MEMBERS:

_____
CITY CLERK OF THE CITY OF CYPRESS