



August 3, 2017

Jose Jimenez, City Planner
Public Works and Development Services Department
2535 Commerce Way
Commerce, California 90040

**Subject: Proposal to Prepare an Initial Study and Mitigated Negative Declaration
Camfield Avenue and Telegraph Road Storage-to-Office Conversion and Parking
Structure, Commerce, California, Commerce, California**

Mr. Jimenez:

We are pleased to submit this proposal to prepare an Initial Study and Mitigated Negative Declaration for the conversion to office use of the second and third floors of the existing storage building at 2035 Camfield Avenue, as well as the construction and operation of a five-story parking structure on approximately 0.70 acres of the adjacent 5401 Telegraph Road in the City of Commerce, Los Angeles County, California.

The budget presented herein includes preparation of Air Quality/Climate Change, Cultural, and Noise, studies as well as administrative draft, public review, and final versions of the Initial Study. MIG will work directly with City staff during the review process to ensure a thorough and comprehensive analysis of environmental impacts as the proposed project relates to existing conditions. MIG has significant California Environmental Quality Act (CEQA) experience pertaining to a wide variety of office/commercial uses with parking structures, and we have worked with a number of local jurisdictions on similar projects including El Monte, Monrovia, Carson, Monterey Park, and Culver City. The proposed project represents an opportunity to provide more office space and parking for the City of Commerce. MIG is uniquely qualified to undertake the necessary environmental review and disclosure as required under State law. The Initial Study can be completed for an estimated budget of **\$25,400**. The proposed project will be billed on a time and materials basis. Project work will be billed monthly and payments are due and payable to MIG within thirty days of invoice.

If you have any questions or need additional information, please contact me in our Riverside office at 951-787-9222. Thank you for the opportunity to assist in the preparation of environmental documentation for your project.

Regards,

Pamela D. Steele
Principal

PDS/ch

Proposal for Environmental Documentation

Camfield Avenue/ Telegraph Road Storage-to-Office Conversion and Parking Structure, Commerce, California

Project Understanding

The proposed project requires approval of a Conditional Use Permit to allow the establishment of an office use within the M-2 Zone in the City of Commerce, Los Angeles County, California. Specifically, the applicant is requesting to convert the second and third floors of the existing public storage use at 2035 Camfield Avenue (APN# 6336-022-011) to office space totaling 61,720 square feet. In addition, the project would include construction and operation of a five-story parking structure on approximately 0.70 acres of the adjacent property located at 5401 Telegraph Road (APN# 6336-022-027). The property located on Telegraph Road currently contains a two-story commercial use that is scheduled for demolition prior to acquisition of the property by the project proponent. The proposed parking structure will accommodate 662 parking spaces and will be available for use by employees of the proposed new office use. Ingress and egress for the proposed project will be provided via the existing driveway located at 2035 Camfield Avenue.

Work Proposal

Initial Study Scope

Phase 1: Technical Review and Project Description

Initially, MIG will review the development application, project plans, any applicant-provided technical reports prepared for the project, and any other documents relevant to the environmental analysis. Secondly, a review of the project location, environmental setting, and project characteristics will be conducted in order to identify baseline environmental conditions with potential to be affected by the project. Proposed tasks include a site visit, preparation of resource evaluation studies, and preparation of technical documentation to support the discussions of environmental impacts and effects in the Initial Study and Mitigated Negative Declaration. This review will allow us to determine the adequacy in providing the information necessary to complete the CEQA documentation.

The project description will concisely articulate the key features of the project, including: (1) regional and local setting; (2) project history; (3) project objectives; (4) project characteristics, and (5) intended uses of the Initial Study (IS) including a list of lead, responsible, and other agencies expected to use the document in decision making (if applicable) and a list of approvals for which the Initial Study will be used. A draft project description will be submitted for review and comment by City staff to ensure that the description presented throughout the Initial Study is properly representative of the proposed project and reflects the same understanding by all team members with regard to the environmental issues that will be screened from the further review or may require additional analysis. MIG will respond to one round of one consolidated set of comments on the project description before proceeding with the environmental analysis.

Phase 2: Technical Reports

MIG will review the project plans and any technical reports prepared for the project by a third party. We will prepare a memorandum, if necessary, identifying any deficiencies or concerns related to third party reports and their ability to support preparation of the Initial Study.

Our proposal includes preparation of the following technical reports:

Air Quality/Greenhouse Gas Assessment

MIG will prepare an Air Quality and Climate Change Assessment to analyze the following (preparation of our air quality studies is subject to the Terms of Agreement included as Attachment A):

- Consistency with the Air Quality Management Plan (AQMP)
- Construction and demolition emissions
- Cumulative Impacts

Cultural Resources

MIG will conduct a Cultural Resources Records and Sacred Lands File search, at a minimum, to determine if the presence of any cultural resources have been identified in the project vicinity. A field survey will also be completed during our initial site visit. Given the urbanized nature of the site and project vicinity, it is unlikely that the site will be listed as an historic resource or contains previously undiscovered buried paleontological or archaeological resources. As such, formal Cultural Resources Management and preparation of a Phase I Cultural Resources Technical Report is not proposed at this time. In the unlikely event that previously undiscovered buried cultural resources are discovered during ground-disturbing activities, mitigation will be included in the IS/MND to ensure impacts to buried cultural resources are less than significant.

Noise

MIG will prepare a Noise Impact Study to provide an analysis of construction noise and vibration impacts on noise sensitive receptors in the project vicinity. Operational impacts related to use of the proposed office development and parking structure will also be analyzed. Construction-related and operational noise impacts will be modeled to include impacts generated by project traffic and analyzed in comparison to existing noise levels. The study will analyze the project consistency with applicable federal, State, and local regulations and mitigation will be identified to reduce noise impacts to less than significant levels, where possible and necessary.

Phase 3: Initial Study

This proposal assumes that the Initial Study will support adoption of a Mitigated Negative Declaration (IS/MND). We assume that at a minimum a site plan, elevations, and estimates on import/export of soil will be provided by the Client. It is further assumed that sufficient information concerning the local water, sewer, and storm drainage systems and local public services will be provided by City Staff or the Client in response to our inquiries.

MIG will then prepare a fully annotated Administrative Draft IS/MND for City review, with explanatory responses to the 80+ questions, sufficient to summarize the results of our analysis of the environmental effects of the project. MIG will take full advantage of the myriad resources and research databases available to the public in order to provide a detailed assessment of any potential impacts, pursuant to CEQA. Project effects will be assessed in comparison to regulatory thresholds established by State and local agencies. We do not anticipate that the proposed project will result in any significant and unavoidable impacts to the environment that would result in the need for an Environmental Impact Report. However, should the project analysis show significant impacts that cannot be mitigated or impacts related to topics deemed controversial by the City, the results of the analysis could warrant preparation of an EIR. Due to the nature of the project and project site location, we anticipate the key topics for the project to be Aesthetics, Air Quality, Land Use and Planning, Noise, and Transportation and Traffic.

Electronic copies of the completed Screencheck Draft IS/MND will be submitted for review and comment by City Staff. We will then incorporate the City's comments and provide a Draft IS/MND for approval. Following approval of the Draft IS/MND, MIG will prepare a Public Review IS/MND for publication. Please note that any changes to the project after completion of the project description could require schedule and budget adjustments to incorporate the changes into the Initial Study. Preparation of the Initial Study is subject to the Terms of Agreement included as Attachment B.

Mitigated Negative Declaration Scope

Phase 4: Draft Mitigated Negative Declaration

If, as assumed, the Initial Study supports adoption of a Mitigated Negative Declaration (MND), MIG will package the Initial Study for circulation as an MND including any special MND forms that the City may require. If no specialty forms are required, then Section 2 (Environmental Determination) of the Initial Study will serve as the MND for the project. We will have the Environmental Determination signed by the City for inclusion in the Initial Study. This phase includes completion of the Mandatory Findings of Significance consistent with the adoption of the MND.

Phase 5: Public Review and Noticing

MIG will prepare a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) for public circulation to request comments on the Initial Study/Mitigated Negative Declaration. We will complete the standard NOI form or use a preferred template from the City. This phase includes circulation of the Initial Study and MND for public review. We will mail an electronic copy of the IS/MND and NOI to up to 50 agency recipients or other entities included on the City's standard environmental distribution list. If the City requires circulation to surrounding properties, we will mail a notice to properties within the required distance of the project site. We anticipate a 20-day review period will be required. We assume that the City will post the NOI at City Hall and in the local newspaper (if required) in accordance with their own policies for CEQA implementation.

Phase 6: Response to Comments

At the conclusion of the public review and comment period, MIG will prepare written responses to comments concerning the adequacy of the environmental impact analysis, if necessary and requested by the City. Individual responses would be at the discretion of the City as they are not required by CEQA. If minor revisions, corrections, or clarifications to the Initial Study are warranted, we will make those changes and compile a Final Initial Study for adoption by the City's decision-makers. We will also prepare a Mitigation Monitoring and Reporting Program, pursuant to Section 15097 of the CEQA Guidelines.

Phase 7: Hearings

For budgeting purposes, this proposal assumes a MIG team member will attend one public hearing or meeting leading to project approval. Additional attendance at meetings or hearings will be attended upon request, at cost of time and materials. This task will also include periodic coordination with City Staff, including conference calls.

Phase 8: Notice of Determination

Within five days of approval of the project, MIG will prepare and file the Notice of Determination (NOD) with the County, provided the City permits us to do so.

Schedule

Based on the proposed scope of work, we anticipate the Draft Technical Reports will be completed in seven (7) to ten (10) weeks and the Draft Initial Study will be completed in six (6) to eight (8) weeks from completion of the technical studies. The Final Initial Study will be completed two weeks following receipt of City comments on the Screencheck Draft IS. Depending on the level of environmental clearance required by the City, preparation and adoption of an MND will take approximately five (5) to six (6) months including the mandatory 20-day public review and City review cycles. If an EIR is required, it could take between nine (9) months to a year to complete the process including mandatory 30-day and 45-day review periods, City review

and potential third party review, and hearings. However, as previously mentioned an EIR is not anticipated to be needed at this time.

Budget

The cost to conduct the analysis and prepare the Technical Reports and Initial Study is **\$25,400** based on time and materials. Project work will be billed monthly. Payments are due and payable to MIG, 1500 Iowa Avenue, Suite 110, Riverside, California 92507 within 30 days of invoice. Expenses will be billed at cost plus ten percent for administrative costs. As the project progresses, if there is a change in scope or additional time and efforts are needed, an amendment to the budget will be requested before proceeding. A summary budget is provided below.

Proposed Budget

Initial Study/Mitigated Negative Declaration		
Phase	Description	Cost
1	Technical Review/ Project Description	\$2,000
1A	Air Quality Impact Analysis	\$3,000
1B	Noise Impact Analysis	\$3,500
2	Initial Study	\$5,500
3	Draft MND	\$600
4	Public Review/Noticing	\$2,500
5	Response to Comments	\$1,450
6	Hearing	\$600
7	NOD	\$500
8	<i>Project Management</i>	\$2,000
	<i>Administrative</i>	\$3,500
	<i>Expenses</i>	\$250
	GRAND TOTAL	\$25,400

Experience

MIG has prepared numerous environmental documents for a variety of projects throughout southern California. Key project experience is provided below:

City of El Monte, Flair Spectrum Specific Plan

MIG prepared the Flair Spectrum Specific Plan and associated Environmental Impact Report. The project is located on approximately 14.66 acres and includes the construction of a mixed-use development with two 19-story residential buildings of approximately 600 condominium units, a 690,000 square foot retail outlet center, and a 13-story hotel with 250 rooms including rooftop dining, and above a seven-story parking structure (with one level below grade). The EIR includes an extensive analysis of air quality, lighting, noise, and traffic impacts.

City of Monrovia, Station Square Parking Structure

MIG prepared the Phase I Station Square Specific Plan. MIG also prepared the Station Square Transit Village Phase II Initial Study analyzing the potential environmental impacts of proposed revisions to the land use policies for the Station Square Planned Development area and the development of a Metro Transit Authority

(MTA) operations and maintenance facility to serve the future extension of the Gold Line light-rail system to the City of Monrovia. The project included three development scenarios to accommodate the operations and maintenance facility, office to light manufacturing uses consistent with the city's O/RD/LM zone, or a combination of both, as permitted by the land use policy revisions and with the maximum development intensities permitted by the General Plan. Finally, MIG prepared the Supplemental EIR for alternative locations of the project's proposed 350-space parking structure.

City of Carson, East Dominguez Street Trailer Parking Facility

MIG prepared the Initial Study and Mitigated Negative Declaration for the 2250 East Dominguez Street Trailer Parking Facility project in the City of Carson. The proposed project included the construction and operation of a truck trailer parking facility consisting of 428 parking spaces. An existing 12,912 square foot office building was located on the project site that was preserved in place. The existing 13,558 square foot storage building and 1,424 square foot trailer house were demolished.

City of Monterey Park, 420 N. Atlantic Blvd. Mixed-Use

MIG prepared an Initial Study and Mitigated Negative Declaration for a project that included the demolition of an existing hotel and construction of a five-story mixed-use building with two levels of underground parking. The project included 4,061 square feet of commercial use, 102 hotel rooms, and 84 condominium units. Limited ground floor parking and two levels of underground parking provided 143 hotel and commercial parking and 197 residential parking spaces for a total of 340 spaces. A passenger car pick-up, drop-off, and loading area was also provided at the main entrance of the hotel on the southern side of the building. In addition, bus parking and loading areas were provided on the ground level to provide access to the hotel use.

City of Culver, Legado Crossing Mixed-Use

MIG prepared an Initial Study and Mitigated Negative Declaration for a project that included a zoning change from commercial General (CG) and Industrial General (IG) to Planned Development and the construction of a mixed-used development of 115 rental housing units and 31,240 square feet of neighborhood and general commercial uses on 1.78 acres. The project included five-stories of above-grade for residential and commercial uses, and two levels of below-grade parking. A total of 373 parking spaces were provided- 35 spaces at ground level, 154 spaces in the upper level garage, and 175 spaces in the lower level garage.

Terms of Agreement

2035 Camfield Avenue Storage-to-Office Conversion and 5401 Telegraph Road
Parking Structure, Commerce, California

Air Quality & Climate Change Assessment

The scope of work, budget, and schedule and any contractual agreements based on the contents of the attached proposal, signed Letter of Agreement, or other document are subject to the following Terms of Agreement:

1. The enclosed scope of work and corresponding budget and schedule do not account for review by legal counsel. Our environmental documents and technical reports are prepared using our expertise and understanding of the letter and spirit of the California Environmental Quality Act (CEQA) and/or the National Environmental Policy Act (NEPA) rooted in the principles of scientific research and discovery. Considering the interpretative nature of CEQA and varying ideologies and concerns related to the contents of CEQA environmental documents, widely differing opinions on what constitutes a defensible document is common among attorneys. If review by legal counsel is requested by the Client, we will request an increase in the budget and extend the schedule to account for additional comments and potential meetings associated with the addition of attorney review.
2. Our technical reports are prepared in accordance with our knowledge and interpretation of the regulatory requirements and industry standards in place at the time authorization to proceed is issued. If regulatory requirements or industry standards change during preparation of the technical report, changes to our scope of work, schedule, and/or budget may be recommended or required to ensure the technical report meets the latest legal, professional, and/or ethical standards.
3. Should responses to more sets of comments from the Client and/or the local jurisdiction or responses to comments over additional rounds beyond those specified in the scope of work be requested, the schedule will likely be delayed in preparation of the technical report and will likely require a budget increase to complete the additional work.
4. Second round comments are assumed to be in response to the adequacy of revisions made as a result of first round comments. No new comments will be addressed during the second round without authorization by the Client after consideration of potential changes to the scope of work, increase in budget, and/or delays in schedule.
5. MIG is not responsible for delays in schedule or increases in budget caused by review by the local jurisdiction, sickness, strike, boycott, equipment failure, communications delays, or Acts of God.
6. MIG is not responsible for any actual or perceived health impacts that may indirectly result from the preparation of our technical reports. Our modeling, analysis, and reporting is based on our expertise and knowledge of the modeling software, scientific methodologies, regulatory requirements, thresholds of significance, and industry knowledge utilized in the preparation of our technical reports. The physical effects of a project are projected and the resulting, potential impacts to the environment are assessed with mitigation applied as reasonable and feasible, pursuant to CEQA. The Lead Agency is ultimately responsible for determining that potential impacts to the environment, that could include human health, are acceptable.

Terms of Agreement

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Parking Structure, Commerce, California

Initial Study & Mitigated Negative Declaration

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- The enclosed scope of work and corresponding budget and schedule do not account for review by City Counsel or any other attorney. Our documents are prepared from our expertise and understanding of the letter and spirit of the California Environmental Quality Act (CEQA) rooted in the principles of scientific research and discovery. Considering the interpretative nature of CEQA and varying ideologies and concerns related to the contents of CEQA environmental documents, widely differing opinions on what constitutes a defensible document is common among attorneys. If review by legal counsel is requested by the City and/or the Client, we will request an increase in the budget and extend the schedule to account for additional comments and potential meetings associated with the addition of attorney review.
- We assume all technical reports will be prepared in accordance with regulatory and industry standards. If critical deficiencies or errors are identified in the technical reports, the preparation of the Initial Study may be delayed to allow for corrections.
- Should responses to more sets of comments from the Client and/or City than specified in the scope of work or responses over more rounds of comments than specified in the scope of work be needed, the schedule will likely be delayed in preparation of the Initial Study and will likely require a budget increase to complete the additional work.
- Second round comments are assumed to be in response to the adequacy of revisions made as a result of first round comments.
- This proposal does not include preparation of findings of fact or statements of overriding consideration which are assumed to be prepared by City Counsel or other designee.

Minor revisions to the Initial Study after circulation for the 20-day public review period exclude any significant new information such as the identification of new significant impacts or new mitigation measures that require a substantial alteration to the proposed project. This scope of work does not include preparing responses to any oral comments at any public hearings that may be held during the Initial Study & Mitigated Negative Declaration public review period.