



February 21, 2018

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 for the Justman Packaging Washington-Telegraph Relocation Project, Commerce, California, Commerce, California

Mr. Jimenez:

We are pleased to submit this proposal to prepare an Initial Study and Mitigated Negative Declaration for the construction of a new 63,222 square foot warehouse at 6300 Telegraph Road in the City of Commerce, Los Angeles County, California, and relocation of operations from the existing Justman Packaging and Display Company located at 5829 Telegraph Road to the new warehouse building.

The budget presented herein includes preparation of a Visual Impact Simulation, Cultural Resources Records Search, Air Quality/Greenhouse Gas and Noise modeling, and a formal Traffic Study, as well as an administrative draft, public review draft, 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 utilize a vacant parcel of land within a highly visible area of the City along its main regional thoroughfare. 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 **\$40,450**. 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

Justman Packaging and Display Warehouse Relocation Project
Commerce, California

Project Understanding

The proposed project includes construction of a new 63,222 square foot warehouse at 6300 Telegraph Road in the City of Commerce, Los Angeles County, California, and relocation of operations from the existing Justman Packaging and Display Company located at 5819 Telegraph Road to the new warehouse building. The property located at 5819 Telegraph Road currently contains a single-story industrial office building/distribution facility that is scheduled for demolition prior to sale of the property by the project proponent. In addition, the project would include parking and landscaping improvements associated with construction of the proposed new warehouse. Ingress and egress for the proposed project will be provided via a proposed 28-foot driveway on the north side of the site and a proposed 50-foot driveway on the south side of the site.

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 to City staff and the project proponent 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.

Visual Impact Simulation

MIG will prepare a Visual Impact Simulation showing the project's potential impacts from the Interstate 5 Freeway. Based on discussions with city, MIG is proposing either a static simulation or an interactive 3d simulation. The static simulation will include images of the proposed warehouse superimposed over photos of the casino and hotel taken from the freeway. The interactive simulation will include the creation of a

virtual three-dimensional context, showing a “pass-by” view of the proposed building from the perspective of a driver travelling north on the Interstate 5 Freeway.

Phase 2: Technical Reports/Studies

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 studies and technical reports:

Air Quality and Greenhouse Gas Modeling

MIG will conduct Air Quality and Greenhouse Gas modeling to analyze the following:

- Consistency with the Air Quality Management Plan (AQMP)
- Construction and Operation Emissions
- Cumulative Impacts
- Effective Mitigation Measures, if necessary

Cultural Resources

MIG will conduct a Cultural Resources Records and Sacred Lands File search, at a minimum, to determine if any cultural resources have been identified as being present in the project vicinity. A field survey will also be completed due to the undeveloped nature of the site. However, given the urbanized nature of the 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 Modeling

MIG will conduct Noise modeling to analyze the following:

- Construction Noise and Vibration Impacts
- Operational Noise and Vibration Impacts
- Consistency with applicable Federal, State, and local regulations
- Effective Mitigation Measures, if necessary

Traffic Impact Analysis

Kunzman Associates will prepare a formal Traffic Impact Analysis report to determine the proposed project's impacts to existing traffic volumes as well as intersection and roadway operation performance in the project vicinity. The analysis will take into account peak hour traffic conditions to analyze existing intersection performance based on the Intersection Capacity Utilization and Highway Capacity Manual delay methodologies. The report will include an analysis of existing plus future cumulative traffic volumes to determine intersection performance with development of the proposed project. The report will also determine traffic improvements needed to serve the above with-project traffic scenario. Finally, the report will include a review of funding sources for study area circulation improvements, including funded improvements. The report will incorporate all findings and supporting calculations and assumptions. The budget provided below will include estimates with and without the Traffic Impact Analysis, should the Client or City decide to consult with a different firm.

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 Applicant. 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 Applicant 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, Greenhouse Gases, 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 City staff approval. Following staff 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.

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 25 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 30-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: 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 7: 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

MIG anticipates the proposed Traffic Impact Analysis is to be complete in two (2) to four (4) weeks from date of authorization and subsequent receipt of all requested data essential for the study. Based on the proposed scope of work, MIG anticipates the technical analyses and Screencheck Draft IS will be completed in eight (8) to twelve (12) weeks from authorization to proceed. The Final Initial Study will be completed two weeks following receipt of City comments on the Screencheck Draft IS. Should a third party be hired to conduct the Traffic Impact Analysis, the Screencheck Draft IS will be complete no sooner than two weeks after receipt of the report. Depending on the level of environmental clearance required by the City, preparation and adoption of an MND will take approximately three (3) to four (4) months including the mandatory 30-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 staff and attorney review, and hearings. However, as previously mentioned an EIR is not anticipated to be required for this project.

Budget

The cost to conduct the analysis and Initial Study is **\$40,450** 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/Visual Simulation	\$2,500
1A	Air Quality Impact Analysis	\$3,000
1B	Cultural Resources Analysis	\$6,000
1C	Noise Impact Analysis	\$2,500
1D	Traffic Impact Analysis	\$9,750
2	Initial Study	\$6,000
3	Draft MND	\$600
4	Public Review/Noticing	\$2,500
5	Hearing	\$600
6	NOD	\$500
7	<i>Project Management</i>	\$2,000
	<i>Administrative</i>	\$3,500
	<i>Expenses</i>	\$1,000
	GRAND TOTAL	\$40,450