

CEQA Notice of Exemption

TO: Office of Planning & Research
1400 Tenth Street, Room 121
Sacramento, CA 95814

FROM: Department of Development Services
411 W. Ocean Blvd, 3rd Floor
Long Beach, CA 90802

L.A. County Clerk
Environmental Fillings
12400 E. Imperial Hwy., Room 1201
Norwalk, CA 90650

Exemption Number: _____

Project Title (Application Number): _____

Project Location – Specific: _____

Project Location – City/County: **City of Long Beach, Los Angeles County, California**

Description of Nature, Purpose and Beneficiaries of Project:

Public Agency Approving Project: **City of Long Beach, California**

Person or Agency Carrying Out Project: _____

Exempt Status: **(Check One)**

- Ministerial (Sec 21080(b)(1); 15268);
- Declared Emergency (Sec 21080(b)(3); 15269(a));
- Emergency Project (Sec 21080(b)(4); 15269(b)(c));
- Categorical Exemption. State type and section number: _____
- Statutory Exemption. State code number: _____

Reasons why project is exempt:

Lead Agency

Contact Person: _____ Contact Phone: _____

Signature: _____ Date: _____ Title: _____

Memorandum

Date: 10 November 2022
To: Scott Kinsey, Planner V, City of Long Beach Development Services
From: Michael Kennedy & Fatemeh Ranaiefar, Fehr & Peers
Subject: **Goodman Commerce Center Interim Trucking Conditional Use Permit**

LB22-0007.03

This memorandum summarizes the relationship between two completed Transportation Impact Studies (TIS's) previously prepared by Fehr & Peers for the Goodman Commerce Center (GCC) Project. It also summarizes the findings specific to the proposed interim conditional use permit for the operation of a portion of the Project site for truck trailer parking.

Completed Transportation Impact Studies

Fehr & Peers prepared two TIS's in order to evaluate the consistency of the GCC project with the transportation impact analysis of the Globemaster Corridor Specific Plan EIR (GCSP EIR). The following summarizes the Project as analyzed in each TIS:

- **September 2021**—This TIS was prepared to analyze the following project elements:
 - Adaptive Reuse of Building 1 – 463,500 last-mile delivery facility for Amazon
 - Adaptive Reuse of Building 2 – 1,059,700 square feet office and manufacturing for Relativity Space
- **August 2022**—This TIS was prepared to analyze the following project elements:
 - Adaptive Reuse of Building 1 – Subsequent to the completion of the September 2021 TIS, Amazon withdrew from its proposed lease of Building 1. In its place, Fehr & Peers analyzed the facility as 464,552 square feet office and manufacturing facility.
 - Adaptive Reuse of Building 2 1,059,700 square feet office and manufacturing for Relativity Space



- Use of 162,721 square feet of existing surface parking west of Building 1 for truck trailer parking within the City of Long Beach, and 325,393 square feet within the City of Lakewood.

For both the September 2021 and August 2022 TIS's, Fehr & Peers' analysis indicated that the Project impact findings and potential mitigation measures were consistent with the GCSP EIR/EIS findings. By consistent, this meant that no new or more severe impacts were identified as a result of the Project. According to Section 15182 of CEQA ("Projects Pursuant to a Specific Plan"), if a project is consistent with a Specific Plan for which an environmental impact report was certified, then it is exempt from further CEQA analysis, in this case CEQA transportation impact analysis.

While no new or more severe impacts were identified, there were some differences between the two TIS's relative to the approach to trip generation, and the overall trip generation for each iteration of the Project:

- The analysis in the September 2021 TIS (Relativity Space & Amazon) was prepared based on specific information provided by each applicant of the two existing buildings at GCC site such as number of employees at each horizon year, daily and peak hour trip generation and fleet mix.
- The analysis in the August 2022 TIS (Relativity Space & manufacturing facility & trailer parking) was prepared based on the same information from Relativity Space and replaced the Amazon use with Manufacturing and trailer parking. For the truck trailer parking, trip generation estimates were based on data provided from a trailer parking operator on average truck moves per day per acre, with Fehr & Peers' confirmation about reasonableness based on our knowledge of typical usage patterns in these types of facilities located near the San Pedro Bay Port Complex. Fehr & Peers used ITE trip generation rates for the manufacturing use.
- The overall daily trips under the September 2021 TIA were higher than the August 2022 as the Amazon facility had a higher number of trips during off peak hours. However, the peak hour trips under the August 2022 TIS were higher.

Evaluation of Truck Trailer Parking & Potential for Qualification for a Categorical Exemption

This section evaluates whether the trailer parking portion of the proposed Project would qualify for the use of a Categorical Exception under Sections 15301 and 15300.2 of the CEQA Guidelines.



Section 15301 Evaluation

As detailed in the August 2022 TIA, the truck trailer parking located within the City of Long Beach is estimated to generate 133 daily trips, with approximately 7 trips occurring during peak hours. The peak hour analysis assumed 20-hour operations with consistent truck moves per hour to convert daily to hourly peak hour trips.

The August 2022 TIS analyzed the potential for significant transportation impacts of the Project, inclusive of the adaptive reuse of Buildings 1 and 2, and truck trailer parking in both the portions of the site in City of Long Beach and the City of Lakewood.

On a standalone basis, this minor level of traffic associated with solely the truck trailer parking located within the City of Long Beach would not be expected to generate any significant transportation impacts.

The portion of the Project site that would be used for truck trailer parking is already developed with surface parking, and the proposed maintenance improvements to accommodate trailer parking via the conditional use permit, would generally be minor in nature, including parking resurfacing, restriping, fencing, etc. Given the incidental nature of the level of traffic generated by the truck trailer parking, and the minor site improvements associated with this use, the interim conditional use permit for truck trailer parking within the City of Long Beach would not create any traffic impacts that would make it ineligible for a Categorical Exemption under Section 15301 of the CEQA Guidelines.

Section 15300.2 Evaluation

Additionally, the Project would not be subject to any of the special circumstance exceptions under which a Categorical Exemption cannot be used per Section 15300.2 of the CEQA Guidelines as described in italics for each section below:

- **B-Cumulative Impact** – All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type, in the same place, over time is significant. *The proposed CUP is temporary in nature, and would generate negligible maintenance improvements, and minimal activity. It is not expected that successive projects of the same type would be proposed that would create a cumulatively significant impact. Additionally, the Project's potential for significant transportation impacts under cumulative conditions with the other proposed elements of the Project were analyzed in the August 2022 TIS, which concluded that there would be no cumulative transportation impacts that would be inconsistent with the GCSP EIR. Therefore, this exception does not apply.*
- **C-Significant Effect** – A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the



environment due to unusual circumstances. *No unusual circumstances are anticipated for the Project, which will include minimal maintenance related improvements, and minimal traffic generated. Therefore, this exception does not apply.*

- **D- Scenic Highways** – A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. *The Project is not located on official California State Scenic Highways list¹ and therefore this exception does not apply.*
- **E- Hazardous Waste Sites** – A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code. *The proposed project is not located on Hazardous Waste and Substances Site List (CORTESE)². Therefore, this exception does not apply.*
- **F- Historical Resources** – A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource. *The Project is located on an existing surface parking lot, on parcel that was previously designated as industrial/manufacturing use. There are no known historic resources at the Project site proposed for the trailer parking CUP. Therefore, this exception does not apply.*

¹ <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>

² https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES.FUDS&status=ACT,BKLG.COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29