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December 14, 2017

Department of City Planning
City of Los Angeles
200 N. Spring Street, Room 763
Los Angeles, CA 90012
ATTN: Oliver Netburn, City Planner

SUBJECT: Request for full DEIR for CPC-2017-1014-CU-ZAA-ZAD-SPR; ENV-2017-1015-MND (South Bay Distribution Center, 15116-15216 S. Vermont Avenue and 747-761 W. Redondo Beach Blvd., Los Angeles)

Dear Mr. Netburn:

On December 12, 2017, the Board of the Harbor Gateway North Neighborhood Council voted 11-0-0 to submit this letter with our recommendations for the proposed Mitigated Negative Declaration for the warehouse/manufacturing/high-cube warehouse/distribution center at 15116-15216 S. Vermont Avenue and 747-761 W. Redondo Beach Blvd., Los Angeles, known as the South Bay Distribution Center.

We request a full Environmental Impact Report for this project because its size (466,402 square feet) and 24-hours activities will result in major air quality and noise pollution impacts on nearby and adjacent sensitive uses surrounding the site, including the following:

- 100 single family homes to the immediate north of the project
- 20 apartment buildings with approximately 184 units to the south of the project
- 100 single family homes to the south of the project along 154th Street and for a half block south of Redondo Beach Blvd.
- Rosecrans Recreation Center, a public park with outdoor sports fields is immediately to the north of the project at 840 W. 149th Street
- Kei-Ai South Bay Health Care Center, a senior care facility is directly across the street from the project at 15115 S. Vermont Avenue
- Gardena Memorial Hospital, with emergency room services at 1145 W. Redondo Beach Blvd. is one half mile from this project
- Gardena Convalescent Center, a senior care facility at 14819 S. Vermont Avenue
- Gardena Retirement Center, a retirement home for seniors at 14741 S. Vermont Avenue
- First Southern Baptist Church at 1025 Marine Avenue at Vermont Avenue

- Truth of Life Center (church) at 14527 S. Vermont Avenue, and
- Amestoy Elementary School, a public school at 1048 W. 149th Street at Vermont Avenue

Furthermore, because of the project's extensive traffic impacts, congestion at the following intersections cannot be mitigated, as presented in the Mitigated Negative Declaration:

- Redondo Beach Boulevard/Vermont
- Redondo Beach Boulevard/Orchard Avenue north segment
- On and off ramps to the I-110 Freeway/Redondo Beach Boulevard
- Traffic backups at Alondra Boulevard/Vermont Avenue to the south and Rosecrans Avenue/Vermont Avenue to the north

This is why the draft Mitigated Negative Declaration is incomplete and inadequate. It must be withdrawn, and instead, the City of Los Angeles must issue and circulate a full Environmental Impact Report for this project. To support this request, we note that two similar Prologis warehouses, Moreno/Colton and the Eucalyptus Industrial Park, were evaluated by a full Environmental Impact Report, not a Mitigated Negative Declaration. In addition, the project's proposed MND has no project description, listing of proposed mitigation measures, a monitoring program for these mitigation measures, details of the monitoring reporting process will be reported, and a list of consequences if the proposed mitigation programs are either not implemented or fail to mitigate identified environmental impacts.

This is why, according to CEQA, the Draft Environmental Impact Report we request must carefully review and consider the following DEIR alternatives:

- 1) Current industrial usage as proposed
- 2) Similar industrial usage but reduced in size by half
- 3) No project alternative A: 200 units of affordable housing on the eastern half of the property with public park space on the western side
- 4) No project alternative B: Public park space on the entire property with a new gymnasium, swimming pool, tennis courts, and other amenities that the current Rosecrans Recreation Center does not have, including an enclosed bridge over the dividing railroad tracks to connect the two parts of the park

The northeast corner of Redondo Beach Boulevard and Vermont Avenue is a "Commercial Corner" and that is a prime location for land use that would be more compatible and in scale with the existing residential and commercial buildings nearby and with the park to the north of the corner. Although the property is zoned industrial (M2-1VL-O), this zone was adopted in the 1940's and has become outdated because of extensive changes in the surrounding neighborhoods. There are now single-family homes to the north and apartment buildings along the south side of Redondo Beach Blvd. In addition, in 2012, the City of Los Angeles approved change of use for the nearby industrial property on the east side of Orchard Avenue, from industrial to "specialty retail and office," for use as a small shopping center. This change is much more in keeping with the land uses that have developed over the past sixty years. There is currently only one industrial use on a nearby property, a construction debris recycling facility about ten feet from this project site.

Furthermore, the proposed Prologis project will not provide a service that is beneficial to the local community because there are already 42 logistics/distribution centers located along the Figueroa Street corridor in our dedicated industrial zone and within two miles to the east of the I-110 freeway. These logistics/distribution centers are between one mile to three miles from the proposed Prologis site.

As proposed, the Prologis project would be 54 feet high. As a result, it would be the tallest building in the immediate area and incompatible with nearby existing buildings that are one and two stories. In addition, the proposed 24-hour Prologis operation is also incompatible with surrounding sensitive uses, such as the nearby single-family homes, apartments, park, senior care centers, soon-to-open child care center in the park, hospital, churches, and school. The increased level of air pollution and noise pollution will further degrade the existing quality of life for nearby residents, particularly those who live in the apartments on the south side of Redondo Beach Blvd. and who already suffer from a high level of traffic noise.

In terms of General Plan consistency, the Harbor Gateway Community Plan states “Wherever possible, industrial uses should be concentrated in industrial parks.” The Prologis–leased property at 15116-15216 and 747-761 W. Redondo Beach Blvd. is not part of an industrial park. The adopted Community Plan also states that “The City should accelerate acquisition, expansion and improvement of neighborhood parks throughout the Community.” It also states “The City should encourage continuing efforts by County, State and Federal agencies to acquire lands for open space.” Either proposed DEIR Alternative 3 or Alternative 4, two environmentally superior DEIR alternatives, would advance the Community Plan policies.

We also note that this project has an environmental justice impact for the community, because more than 85% of the impacted residents are Hispanic or African American according to recent census data. Furthermore, air quality issues from the I-110 freeway already impact the local community. The income level of a majority of those living in the apartments along Redondo Beach Blvd. is below the median.

These facts lead us to an obvious question: why do other jurisdictions require a full Environmental Impact Report for similar Prologis’ warehouse/distribution centers when the City of Los Angeles only requires an MND for this project while providing the applicant an expedited planning approval process which blocks a thorough CEQA review of the Prologis project’s impacts on the local community?

The DEIR that we request needs to evaluate the following community impacts, as well as potential mitigation measures that have been previously discussed:

1) Hours/Days of operation: Limited to 7 a.m. to 10 p.m. Monday through Friday, hours of 8 a.m. to 5 p.m. on Saturdays limited to internal operations within the building only. No operations allowed on Sundays, which will help to mitigate the impact of sound emanating from trucks and other operations of the facility on nearby residents and other sensitive uses, such as the Kei-Ai South Bay Healthcare Center at 15115 S. Vermont Avenue, Gardena Convalescent Center at 14819 S. Vermont Avenue, Gardena Retirement Center at 14741 S. Vermont Avenue and those using Rosecrans Recreation Center, 840 W. 149th Street. The applicant has indicated that with the requested 24-hour operation will feature up to 72 large trucks and 246 vehicles. They could be entering and exiting the site during the night as well as the daytime. The level of

traffic would be cumulative, since the level of current traffic noise along Redondo Beach Boulevard is already significant for local residents living in the apartments on the south side of the street. At present, the night time sound from trucks operating at the California Waste Services 10 feet to the northeast of the proposed Prologis project site can be heard by residents living several blocks to the north of the project site.

2) Traffic mitigation: In order to mitigate the additional 24-hours traffic generated by this project, particularly if the warehouse is used for an Amazon or similar fulfillment center purpose with multiple vehicle and truck trips throughout operating hours, we need to determine if the following mitigation programs already discussed can sufficiently mitigate traffic impacts.

- a) Improving the intersection of Redondo Beach Boulevard with the entrance and off-ramps of the I-110 freeway after consultation with Caltrans, including a study of the feasibility of two left turn lanes when heading west for the north bound I-110 on ramp.
- b) Re-engineering Orchard Avenue's north segment to create major turning lanes for five-axle, fifty-three foot trucks because at least 150 feet of length is necessary to stack two trucks.
- c) Studying of traffic flow on Orchard Avenue's north segment by Los Angeles Department of Transportation, to include elimination of parking on the west side of the street and curbs relocated to the fence lines.
- d) Installing a traffic signal at 157th/Magnolia and Vermont Avenue (with the approximately \$1 million cost to the City of Gardena City covered by the developer, Prologis) that would help to relieve the current traffic backups at the Redondo Beach Blvd./Vermont Avenue and Alondra Blvd./Vermont Avenue intersections.
- e) Constructing right turn only signs and violation code citations on the signs, as well as design of the right-turn only exits for the Redondo Beach Blvd. entrance/exit to prevent exiting vehicles making U-turns onto Redondo Beach Blvd. in order to return to the I-110 freeway
- f) Installing signage and striping to prohibit cut-through traffic on 149th Street between Vermont Avenue and Figueroa Street as well as speed humps installed along 149th Street from Vermont Avenue to Estrella Avenue to further discourage cut-through traffic.
- g) Because Vermont Avenue is a highway of variable width of from 40 to 50 feet (an "Avenue I" per the MND) and because just north of Redondo Beach Boulevard there is a bus stop next to the proposed site, both the proposed entrance/exit for large trucks and the entrance/exit for employee vehicles must be relocated because of the traffic back ups the project would create on that segment of Vermont Avenue.

3) Noise – for sound emanating from the site during hours of operations and for increased levels of noise from traffic along Redondo Beach Blvd., we request that the following proposed mitigation program be carefully evaluated:

- a) A 30-40' solid acoustic sound wall installed on the north side of the property with clinging vines grown on the outside of the wall to discourage graffiti and trees planted on both sides of the wall to absorb sound waves
 - b) After identifying noise-sensitive receptors (such as apartments, homes, nursing homes, schools, and outdoor sports fields, and walking paths in Rosecrans Recreation Center) sound-level measurements to be conducted prior to construction and mitigation measures designed to determine if noise impacts can be reduced to less than significant.
 - c) Off site traffic noise level increases must be studied and mitigation measures considered to determine if noise impacts could be reduced to less than significant.
- 4) Air quality** – Per the South Coast Air Quality Management District, the project area is currently out of attainment for both ozone and PM10 particulate matter. Because of impacts from the additional trucks and vehicles traveling to the site possibly multiple times per day, as well as possible manufacturing of unknown items, we request the following:
- a) At any one time, if only two to three axle trucks and vehicles are allowed to exit onto Vermont Avenue at any one time, is this sufficient to reduce the noise, air pollution, and traffic impact on Vermont Avenue from Redondo Beach Boulevard to Rosecrans Avenue to levels of insignificance.
 - b) If appropriate street trees are planted along Redondo Beach Blvd., north and south sides, from Vermont Avenue to the I-110 freeway and along Vermont Avenue from Redondo Beach Blvd. to the railroad tracks, will these offset the increased traffic noise and also the air pollution impact of this project on the nearby residents and users of the Rosecrans Recreation Center sports fields?
 - c) If trees are planted along the north side of the south fence for the Rosecrans Recreation Center will this significantly absorb air pollution and also block views of the sound wall and warehouse site so that they are not so visible to people using the park and/or living north of the site?
 - d) No landscaping plan has been presented in the Mitigated Negative Declaration and this needs to be fully developed and included in the DEIR.
 - e) If trucks idling on the north side of the property at the loading docks utilize an exhaust collector, is this sufficient to contain their exhaust?
 - f) Evaluation of using electric shuttles to be provided by the future tenant(s) to shuttle their employees from the I-110 Silver Line, Metro Green Line, and Blue Line to this site.
 - g) Require tenant(s) to provide electric tractors for moving chasses/trailers on site.
 - h) Developer to pay for extending the bike lane along Vermont Avenue from Artesia to the north side of Redondo Beach Blvd.

- i) The extent to which significant air quality impacts could be mitigated, other than utilization of the afternoon breezes from the ocean, is not detailed in the MND and needs to be fully analyzed in the DEIR.

5) Aesthetics:

- a) The proposed MND states that there would be “no impact” on the site’s scenic vistas, even though, as proposed, a four-story or taller building with maximum lot coverage will block the current view of the San Gabriel Mountains to the north of the project site.
- b) The height of the Prologis building would, therefore, be out of character with the predominantly one and two-story buildings surrounding the site. As a result the Prologis project would substantially degrade the existing visual character of the site and its surroundings.
- c) The lighting necessary to light the truck loading docks and parking spaces on the north side of the property during a 24-hour operation will create a new source of substantial light and glare impacting the residents living north and west of the project. These impacts and their potential mitigation programs need to be fully evaluated in the DEIR.
- d) The sound wall on the north side of the property needs to be evaluated in the DEIR to determine if it shields from view the containers on trailers that may be stored on that part of the property.

6) Cultural Resources: The evidence for the claims that there are no cultural resources on site must be provided, not simply asserted. For example, the project will require excavation of the existing large concrete pads in order to remove them, and this could uncover fossils or anthropological items.

7) Geology and Soils: The MND states that the project is located near the Newport/Inglewood fault. A 3.0 earthquake northwest of the site near Normandie Avenue and Rosecrans Boulevard was recorded recently as well as eleven other earthquakes nearby in recent years. This is why a full seismic analysis is required in the DEIR to determine the impact of major earthquakes on this project and site.

8) Green House Gas Emissions: The DEIR must evaluate Green House Gases generated by operations, as well as subterranean methane gas at this site and methods for monitoring and mitigating any methane gas releases, such as an approved Methane Control System consistent with the site’s “O” (Oil) zoning (M2-1 VL-O).

9) Hazards and hazardous materials:

- a) If a future tenant uses this building for manufacturing, the potential environmental impacts of this industrial operation must be considered in the DEIR. This review must also consider the proposed methods of disposing of manufacturing waste, the use of energy and water in the manufacturing processes, and the extent that the City of Los Angeles’ Conditional Use Permits address the mitigation of these potential pollutants and toxins.

- b) The DEIR must evaluate an assessment of any hazardous waste remaining under the site from former uses that will be disturbed during construction.

10) Hydrology and water quality: The DEIR must evaluate the proposed permeable paving for the front parking lot in addition to the water retention basin already planned for the north side of the property as to whether these have the capacity of the project to collect storm water on site to obtain zero run off.

11) Construction conditions:

- a) Hours of construction work: Monday through Friday between 7 a.m. to 4 p.m.; no construction activity on Saturdays except to deliver supplies and removal of waste; no construction activity on Sundays or holidays.
- b) Conduct 20-foot deep borings, sampling, and tests of soil contaminants on the property for every 1000 square foot in suspected areas (e.g., railroad spur tracks, transformer stations, chemical and waste storage sites, corner gasoline station, electrical manufacturing, and furniture manufacturing, etc.) before any construction begins. Soil tests must be done for the northwest corner of the property to test for PCBs that may have migrated to this site from the lubricant used in the past on train wheels. If any contaminants are found, then the developer must pay for the soil clean up prior to construction.
- c) The DEIR must determine how many cubic tons of broken concrete will be removed from the site, where this concrete will be recycled, whether there will be concrete grinders on site, and if the rebar will be removed from the concrete and recycled.
- d) Breaking, ripping, and removing existing concrete slab and foundations under appropriate guidelines so that concrete dust and debris are not released into the air
- e) Contain the concrete dust which will be generated when the large existing concrete pad is demolished using a continuous water spray and mesh or tarp material hung over the work area
- f) Providing truck covers to stop dirt and dust from blowing away
- g) Providing 12ft chain link fencing with mesh fabric around the project to diminish and contain dust/debris within the grounds of the project during construction (Prologis has agreed to "Providing fencing with mesh fabric around the project to diminish and contain dust/debris within the grounds of the project during construction")
- h) Providing telephone numbers and online video links for dust complaints during construction
- i) Provide mitigation, monitoring, and reporting program including online/real-time videos on-site during construction

Other conditions:

- a) There shall be no access provided for loading and unloading or transporting goods via the railroad
- b) Construction of a new sidewalk along the north side of Redondo Beach Blvd. from Vermont Avenue to Orchard Avenue and from Redondo Beach Blvd. to the railroad tracks along Vermont Avenue
- c) Undergrounding of all power and telecommunications lines along Redondo Beach Blvd. from Vermont Avenue to Orchard Avenue and from Redondo Beach Blvd. to the railroad tracks along Vermont Avenue

While the applicant, Prologis, has been pro-active in working with the local Neighborhood Council to develop a proposed Community Benefits Agreement, we want a full review of the potential mitigations for the more crucial impacts of the proposed project, as listed above.

We further note that the eventual impacts of the proposed South Bay Distribution Center are difficult to assess because the exact tenant(s) and use(s) of the building are not specified and they could also change over time. Additionally, an exact plot layout has not been included in the Mitigated Negative Declaration, only a rendering provided informally by the applicant (Prologis) at the December 2, 2017, HGNNC Planning and Land Use Committee meeting.

Sincerely,



Hannah Woods, Corresponding Secretary
Harbor Gateway North Neighborhood Council

cc: Councilmember Joe Buscaino – Council District 15
Alison Becker, Senior Advisor – Council District 15
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