

HGNNC DEIR Scoping letter

March 11, 2020

Jivar Afshar
Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

Re: Scoping Comments on ENV-2017-1015-EIR (Notice of Preparation-DEIR Prologis Vermont and Redondo Project, 15116-15216; 747-861 W. Redondo Beach Blvd.)

Dear Ms. Afshar:

On March 10, 2020, our Board voted -0-0 to submit the following comments for the scope of the Environmental Impact Report for the Prologis Vermont and Redondo Project at 15116-15216; 747-861 W. Redondo Beach Blvd. including alternatives and topics for assessment and mitigation.

We ask that the following be studied and evaluated as to their impact as compared to the proposed project for the construction, use and maintenance of a 53 foot tall, 340,298 foot square-foot warehouse/manufacturing/high-cube warehouse/distribution center with office mezzanine and a total of 219 automobile parking spaces and 32 bicycle parking spaces, with 36 dock high truck loading positions and parking for up to 71 trailers, as well as 24-hour operation, seven days a week.

RECOMMENDED ALTERNATIVES FOR COMPARISON OF IMPACTS:

- No project and evaluation of negative impact of having no project on the property
- Project without entrance/exit onto Vermont Avenue
- Project without 24-hour operation
- Mixed Use Apartments with affordable units, commercial on ground floor, plus open space
- Mixed Use Frontages on South, East, and West with Warehouse core in center and north, shared parking and shuttles
- Mixed Use Frontage – plus Center/north Educational (or Medical) Core, or LAPD Station, LA Fire Station, Public Library, La County Department of Public Social Services, opioid addiction rehabilitation treatment center/housing, Roosevelt City Park expansion
- Location of the warehouse/manufacturing/high-cube warehouse/distribution center to the Figueroa Street industrial corridor east of the I-110 and north of Rosecrans Avenue.

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ENVIRONMENTAL CATEGORIES FOR ANALYSIS

-Aesthetics – Provide ground level views of proposed structures along with trailered containers from all major intersections and adjacent public areas, including the northerly view from the Recreational Center, easterly view from the shopping center, southerly views from multi-family dwelling, and westerly views from Gardena medical facilities

The 54 foot height of the Project building would be out of character with the predominantly one and two-story buildings surrounding the site thereby substantially degrading the existing visual character of the site and its surroundings.

The lighting necessary to light the truck loading docks and parking spaces on the north side of the Project and building during 24-hour operation will create a new source of significant 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.

-Air Quality – The project area is currently out of attainment for both ozone and PM10 particulate matter. The surrounding community is an environmental justice community because more than 85% of the impacted residents are Hispanic or African American according to recent Census data. The income level of a majority of those living in the apartments along Redondo Beach Blvd. is below the median. Provide impacts of fine particulate matter from 600+ diesel truck trips per day and idling of trucks and all other autos at the traffic lights on the health of those living, working, and playing nearby, including increases to asthma, decreased lung function, cardiovascular disease, cancers, and type 2 diabetes.

Include study of near-zero- and zero-emissions vehicles and truck trips in alignment with new standards being proposed by the South Coast Air Quality Management District.

Cultural Resources – In conjunction with Hazardous materials reviews and assessments, conduct and provide review of all historic aerial and ground-level photographs for the site and vicinity.

-Geology and Soils – Bedrock and Seismicity –

Conduct and provide borings and geophysical surveys to establish depths to competent formations and groundwater levels

Assess and provide assessment of potential for site/structure soil liquefaction

Assess and provide site and structural response to seismic events of >7 RM at <one mile distance

Assess and provide assessment for potential for encountering paleontological resources– during foundation excavations and appropriate mitigation with onsite monitoring and mitigation for paleontological resources

Assess the impact of existing contamination removal and remediation.

-Greenhouse Gas Emissions – Evaluate the impact of an additional 600+ diesel truck trips per day from the proposed Project on the 2019 City of Los Angeles Green New Deal goals for cutting Greenhouse Gas Emissions

Evaluate and assess Greenhouse Gas Emissions 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 (M2-1VL-0).

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Conduct and provide CH₄/Methane monitoring of all borings and ground excavations
Provide mitigatory compensation with full roof-top solar-voltaic panel arrays, electric charging stations for Zero-Emission trucks and refrigeration units, passenger vehicles, and site-tractors for moving trailers

-Hazards and Hazardous Materials – In conjunction with Cultural Resources, conduct review of all historic aerial and ground-level photographs for the site and vicinity for structures with potential for hazardous contamination of the site and soils

Conduct and provide GPR and Magnetic surveys for the entire site to locate tanks, barrels, septic tanks, and piping, especially for the 8 vertical above ground storage tanks that were “removed in 2010 (provide inventory of tank contents 1995-2010).

Provide all documentation, permits, and clearance for site demolitions 2005-2015. Coordinate and provide compilations of all surveys with those boring and surveys for geology

Review all information and accounts regarding potential sites of “rubbish” and “privies”/latrines.

Provide historic alignments for all railroad tracks, spurs, switches, and loading/offloading points and include soil sampling to at alternating 20-ft interval >3ft depths and analyses for all toxic materials, including dioxin from railroad brake fluids.

Provide historic records of all fluid chemical storages along/adjacent to the railroad facilities and their transfer systems (e.g., pumps, spigots, hoses, and tanks)

-Hydrology – Provide for full Low Impact Development rainfall collection, storage, on-site irrigation, and adjacent Recreational Center irrigation and recharge.

Provide contoured ground levels for entire site and relate to adjacent sites groundwater tables and regional flows.

Land Uses and Development - The Project will impact and differs markedly from surrounding land use, creating incompatible land uses. 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.

Examples of sensitive uses around the project are:

R1 and R3 within 130ft (S) and 150ft (N) of Site

Open Space within 150ft (N) of site; Public Facility (Rosecrans Recreation Center) within 500-700ft (N)

Kei-Ai South Bay Health Care, Gardena Convalescent Center, and Gardena Retirement Center within 200-400 ft (W)

Amestoy Elementary School, 1048 W. 149th Street, within 600 ft. NW

UEI College, 661 W. Redondo Beach Blvd. within 150 ft.

First Southern Baptist Church, 1025 Marine Avenue; Truth of Life Center, 14527 S. Vermont Avenue

-Mineral Resources – Oil and gas are produced from wells within one mile of the Project site. Provide top and bottom of hole (well) plots for any well which may pass beneath the site at the current time

Remove ALL “O” Conditions from all parcels of the Site.

-Noise Evaluate possible relocation of trailer loading and storage to east side and avoid truck and shuttling noises from reaching northerly, westerly, and southerly sides adjacent – line-of-sight to residential and sensitive uses

Evaluate the impact of low level vibrations caused by truck traffic on the neighborhood and specifically on possible sleep disruption and subsequent health effects of impacted residents.

Evaluate for onsite electric/zero-noise/emissions shuttle transfers for all trailers onsite.

Evaluate possible restrictions of all idling (>3 minutes) of any Project-related diesel engines within 500 ft of site boundary.

Evaluate possible restrictions of all chilled and refrigerated containers

Evaluate noise absorbing exterior coverings/coating for any structures >12ft high on northerly, westerly and southerly walls

Evaluate a mitigatory 40 ft solid acoustic sound wall installed on the north side of the property with textured noise-absorbing surface and trees planted on both sides of the wall to absorb sound waves.

Provide operational noise assessment of the facility, including trucks entering/leaving, if open 24 hours and if closed as mitigation after 11 p.m. at night and provide noise monitoring and alerts for one and ten-minute noises for 11 pm to 7 am.

Evaluate and assess off-site (e.g. intersections/interchanges) traffic noise level increases near (<300ft) sensitive uses and provide mitigation measures to assure noise impacts are reduced to less than significant (<3 dBA increase over current levels, at 1, 10, and 30-minute intervals)

Monitor all sound levels and assess/mitigate prior to construction.

Design/implement mitigation measures must be designed to reduce noise impacts to less than significant for noise-sensitive receptors, such as apartments, homes, nursing homes, schools, and outdoor sports fields/walking paths in Rosecrans Recreation Center.

Comment [SS2]: Impact on vibration

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Comment [SS3]: Public comment from Dr. Tom

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-Transportation – Provide traffic impacts assessments, mitigation and compensation for I-110 freeway on and off ramps and intersections of Redondo Beach Blvd/Vermont Avenue; Rosecrans Avenue/Vermont Avenue, and Artesia Blvd./Vermont Avenue.

Provide Traffic impacts assessments using both Vehicle-Miles-Travelled (VMT) and Level of Services (LOS) along with Peak Hour congestion. (A,B,C,D,E,F)

Provide circulation assessment including: detailed circulation patterns for passenger vehicles, buses, and trucks for the proposed Project, including 53-foot container 18-wheeler tractor/trailers as to their turning radius, especially for: 700-1,200 ft west of I-110 ramps onto Redondo Beach Blvd., northbound left and right turns inbound for Orchard Avenue and southbound left and right turns outbound as well as right turn onto Vermont Avenue from Redondo Beach Blvd. and right turn onto Vermont Avenue from the Project site.

[Evaluate the possible negative effect to road conditions and surrounding infrastructure.](#)

Provide Transportation Mitigation Measures:

- Employee Shuttles to/from Rapid Transit Stations along I-110
- Prohibition of all Project truck traffic north of Vermont and Redondo Beach Blvd.
- Provide a video simulation of the traffic at "all" hours for residents to see the impact of the truck and auto traffic to/from the Project

David Matthews, Chairperson
Harbor Gateway North Neighborhood Council

cc: Mayor Eric Garcetti
City Attorney Mike Feuer
Councilmember Joe Buscaino – Council District 15
Aksel Palacios, Planning Deputy – Council District 15
Xavier Becerra, Attorney General of California
California Air Resources Board
South Coast air Quality Management District, Planning, Rule Development and Area Source Warehouse Indirect Source Rule and WAIRE Points
Scott Mulkay, Vice President, Regional Construction and Development Manager - Western Region Prologis
Damon Austin, Senior Vice President, Capital Deployment – Southwest Region Prologis