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September 5, 2018

Ms. Terry Kaufmann-Macias
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200 North Main Street, 7th Floor, MS 140
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RE: 15116-15216 South Vermont Avenue / 747-761 West Redondo Beach Boulevard, Los Angeles City Council File No. 18-0279, Environmental Document ENV-2017-1015-MND

Dear Ms. Kaufmann-Macias:

As we discussed on the phone August 3, 2018, our office has reviewed the mitigated negative declaration (MND) for the industrial warehouse distribution center project (the Project) proposed in the Harbor Gateway North neighborhood in the City of Los Angeles and we respectfully submit these comments regarding compliance with the California Environmental Quality Act (CEQA).¹

We recognize that the City has undertaken several initial studies to determine whether the proposed warehouse may have a significant impact on the environment. Nevertheless, the MND falls short of adequately analyzing, disclosing, and mitigating to the extent feasible the significant environmental impacts of the Project. While the Project will draw significant new air pollution into the Harbor Gateway North community, the City has failed to adequately characterize these impacts. In addition, the City has failed to apply enforceable mitigation measures as required by CEQA.

A warehouse project of this scale and size, surrounded by a community that is already overburdened by pollution, necessitates a complete and transparent environmental review process provided by the preparation of an environmental impact report (EIR). While the City has laid the foundation of an adequate environmental analysis of the project through its preparation of initial studies, CEQA requires that the City take the next step and prepare a full EIR.

¹ The Attorney General submits these comments pursuant to his independent power and duty to protect the environment and natural resources of the State. (See Cal. Const., art. V, § 13; Gov. Code, §§ 12511, 12600-12612; D'Amico v. Bd. of Medical Examiners (1974) 11 Cal.3d 1,1415.)

BACKGROUND

I. THE PROJECT

The Project is a one-story 341,402 square foot warehouse that will have a total of 223 automobile parking spots, a minimum of 71 truck trailer parking spots, and 36 truck loading positions.² The Project will be permitted to operate 24 hours a day, seven days a week, with some limitations on the activities that can occur at night.³ The Project allows truck entrance and exits from two points—one on Orchard Avenue with space for at least four trucks to queue and another on Vermont Avenue with space for at least three trucks to queue.⁴ The Project is estimated to generate 1,321 daily automobile roundtrips.⁵ It is not clear what the Project eventually will be used for, as the ultimate tenant and use is not yet identified, but the City proposes to permit use for warehousing, manufacturing, or as a “high-cube warehouse distribution center.”⁶ The City requires additional future approvals should the future tenant plan to use the facility for cold storage or as a fulfillment center.⁷

II. THE PROJECT SETTING IS CHARACTERIZED BY SENSITIVE RECEPTORS ALREADY EXPOSED TO SIGNIFICANT POLLUTION BURDENS

Harbor Gateway North is a neighborhood already heavily burdened by multiple sources of pollution. It ranks in the 100th percentile for overall pollution burden and in the top 5% for pollution burden and vulnerability combined according to the California Environmental Protection Agency’s screening tool CalEnviroScreen.⁸ The I-110 freeway cuts through the

² Los Angeles City Planning Commission, Letter of Determination, Case No. CPC-2017-1014-CU-ZAA-SPR (March 16, 2018), at p. 1 (hereafter “Letter of Determination”).

³ Letter of Determination, Condition 17, at p. C-3. Loading and unloading activity is prohibited within 300 feet from residential buildings between 10:00 pm and 7:00 am. (*Id.*, Condition 32, at p. C-6.) It is not clear how much of the Project activity will fall into this time restriction, and therefore not clear whether it will mitigate impacts of overnight noise and vibration impacts.

⁴ *Id.*, Condition 28, at p. C-6.

⁵ Kunzman Associates, Inc., South Bay Distribution Center (15134 S. Vermont Avenue) Air Quality, Global Climate Change, and Health Risk Assessment Impact Analysis (October 13, 2017), p. 59 (hereafter Air Quality Study).

⁶ Letter of Determination, Condition 2, at p. C-1. A high cube warehouse is “used primarily for the storage and/or consolidation of manufactured goods (and to a lesser extent, raw materials) prior to their distribution to retail locations or other warehouses.” Institute of Transportation Engineers, High Cube Warehouse Vehicle Trip Generation Analysis (October 2016), available at <http://library.ite.org/pub/a3e6679a-e3a8-bf38-7f29-2961becdd498>.

⁷ Letter of Determination, Condition 27, at p. C-6.

⁸ CalEnviroScreen is a tool created by the Office of Environmental Health Hazard Assessment that uses environmental, health, and socioeconomic information to produce scores and rank every census tract in the state, available at <https://oehha.ca.gov/calenviroscreen> (as of

neighborhood, making it no surprise that the community is in the 95th percentile for traffic burdens and 82nd percentile for diesel and particulate matter (PM) 2.5. In addition, the neighborhood is in the 95th percentile for solid waste sites, 95th percentile for leaking underground storage tanks, and 90th percentile for hazardous waste sites. The community is majority Hispanic (63%) and almost entirely made up of people of color (94%). The community that surrounds the project has high asthma rates and low birth weights relative to the rest of the state—higher than 79% and 80% of the state respectively. Other features of the community tend to make it more vulnerable to pollution, including high housing burdens, high rates of unemployment, and linguistic isolation.

The Project is located on a vacant 15-acre lot zoned for light manufacturing land uses.⁹ The Project is surrounded by:

1. Single and multi-family homes to the south along Redondo Beach Boulevard;
2. A nursing home and other light commercial land uses to the west, such as a barber shop, along Vermont Ave;
3. Rosecrans Recreation Center—a public park with outdoor sports fields—to the north along a railroad easement; and
4. One-story light commercial buildings to the east and a construction and demolition recycling facility to the northeast along Orchard Ave.

Amestoy Elementary School is kitty corner to the northwest corner of the Project and several senior facilities, churches, and a hospital are within half a mile of the Project.¹⁰ Harbor Gateway North Neighborhood Council asserts in its comment letter that 200 single family homes and 20 apartment buildings containing 184 units are near and would be impacted by the Project.¹¹ The nearest sensitive receptor, the Rosecrans Recreation Center, is approximately 80

July 17, 2018). A census tract with a high score is one that experiences a much higher pollution burden than a census tract with a low score. Office of Environmental Health Hazard Assessment, CalEnviroScreen 3.0 Report (January 2017), available at <https://oehha.ca.gov/media/downloads/calenviroscreen/report/ces3report.pdf>.

⁹ Department of City Planning Recommendation Report prepared for February 8, 2018 City Planning Commission Hearing, at pp. A-1–A-2.

¹⁰ Letter to Department of City Planning from Harbor Gateway North Neighborhood Council, December 14, 2017.

¹¹ *Ibid.*

feet away.¹² Other sensitive receptors, such as homes and a senior facility, are between 100-550 feet away, including the elementary school which is within 500 feet of the Project.¹³

The I-110 freeway is 650 feet away from the Project and appears to be the most likely source of truck traffic to and from the Project.¹⁴ Trucks entering and exiting the I-110 freeway would traverse Redondo Beach Boulevard, lined with single- and multi-family homes, turning right onto and queuing at the entrance points on Orchard Avenue or Vermont Avenue, where a nursing home and elementary school are situated.¹⁵

COMMENTS

I. THE CITY HAS NOT ADEQUATELY ANALYZED, DISCLOSED, OR MITIGATED THE SIGNIFICANT IMPACTS OF THE PROJECT

California law requires a public agency approving a project to prepare an EIR when the project may have a significant effect on the environment.¹⁶ The EIR is the “heart of CEQA”—it informs the public and decision makers of the environmental consequences of their decisions before those decisions are made—and therefore there is a low threshold for the requirement.¹⁷ If after conducting initial studies the agency determines that there is no substantial evidence in the record supporting a “fair argument” that a project may have a significant effect on the environment, it may prepare a negative declaration.¹⁸ The significance of the activity varies with the setting.¹⁹

Here, while the City has undertaken several studies to evaluate the environmental impacts of the Project, it has substantially ignored or downplayed the existing environmental conditions and sensitive receptors surrounding the Project, resulting in an incomplete and unsupportable conclusion that the Project will not have significant and cumulative impacts. Since the ultimate tenant is not known, the City must evaluate the impacts of all potential uses of the Project, including manufacturing and use as a cold storage facility or fulfillment center, rather than inappropriately deferring that decision for future environmental analysis. Furthermore, the City has included unenforceable and inappropriately deferred mitigation measures in its attempt to reduce the Project’s significant environmental impacts. The Project must be denied until a

¹² Letter of Determination, Finding 2, at p. F-2.

¹³ Air Quality Study, at p. 2; Mitigated Negative Declaration, ENV-2017-1015-MND, at p. 3.

¹⁴ Letter of Determination, Finding 2, at p. F-2.

¹⁵ See *id.*, Condition 28, at p. C-6.

¹⁶ Pub. Resources Code § 21082.2, subd. (a); CEQA Guidelines, § 15064, subd. (a); *Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322, 330.

¹⁷ *Mejia*, 130 Cal.App.4th at pp. 330-332.

¹⁸ *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1399-1400.

¹⁹ *Mejia*, 130 Cal.App.4th at p. 331; CEQA Guidelines, § 15064, subd. (b).

complete environmental analysis assessing its impacts has been conducted and feasible mitigation measures to reduce those impacts have been imposed.

A. The City Neglects to Analyze the Projects Significant Environmental Impacts on Nearby Sensitive Receptors

“A project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant.”²⁰ A lead agency must evaluate whether a project will expose “sensitive receptors” to pollution.²¹ In the air pollution context, CARB recommends a minimum separation between sensitive receptors and sources of air pollution to reduce the sensitive population’s exposure to increased health risks.²² Children and the elderly are especially vulnerable to the health impacts associated with exposure to diesel particulate matter and other air pollution, including cancer, asthma, and heart disease.²³ Because of this, CARB recommends 1,000 feet separation between sensitive receptors and distribution centers or other land uses that would generate more than 100 trucks per day.²⁴

The City at times acknowledges and at other times downplays the Project’s close proximity to sensitive receptors.²⁵ But there is no question the Project is surrounded by sensitive receptors—children play outdoors at the park that is 80 feet away from the project and at recess at the school within 500 feet, elderly people live at the senior facility nearby, and families live in the hundreds of homes and apartments that surround the Project. These sensitive receptors are

²⁰ CEQA Guidelines, § 15300.2; *see also* CEQA Guidelines, § 15064, subd. (b); *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 718.

²¹ *See e.g.* CEQA Guidelines, App. G.

²² California Air Resources Board, *Air Quality and Land Use Handbook: A Community Health Perspective* (April 2005) (hereafter *CARB Handbook*); *see also* South Coast Air Quality Management District, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (May 6, 2005), at p. 2-3, 2-4 (hereafter *SCAQMD Guidance*).

²³ *CARB Handbook*, at p. ES 1.

²⁴ *Id.* at p. 4.

²⁵ Letter of Determination at p. F-2 states, “Given ... [the Project’s] relative isolation from sensitive uses, [the Project] will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.” Also *ibid.*, stating that other than the Rosecrans Recreation Center, the closest sensitive receptors are beyond 100 feet of the Project. *Compare* the MND at p. 20, listing the recreation center and several residences located within 100 feet of the Project, but still none beyond 100 feet. *Compare also* Air Quality Study at p. 2, describing sensitive receptors as including the Rosecrans Recreation Center, single- and multi-family dwellings around 100 feet away, the nursing home located 155 feet away, and additional homes 300-500 feet away, but not including the elementary school. The Air Quality Study concludes that due to distance of nearest sensitive receptors, the operational odor impacts would be less than significant. *Id.* at p. 63.

already exposed to significant air pollution from the I-110 freeway that is located just 650 feet away from the Project and in some instances even closer to the sensitive receptors.²⁶

Nevertheless, the City's health risk assessment analyzes impacts only on those sensitive receptors that are located within 100 feet of the Project, namely the Rosecrans Recreation Center and the homes that are directly across the street from the Project.²⁷ It does not articulate a basis for this distance, and it does not analyze impacts to the nursing home, elementary school, or additional homes that are within the 1,000-foot buffer recommended by CARB. It neglects to analyze impacts to these other sensitive receptors even while recognizing that the higher-than-average cancer risk already experienced by people in the area is "largely due to the proximity of the Santa Fe railroad lines and I-110 Freeway."²⁸ The size of this Project, the volume of additional mobile sources of air pollution it is anticipated to attract, and its close proximity to sensitive receptors, along with established CARB and SCAQMD guidance, raises a fair argument that there may be unmitigated environmental impacts that must be studied through a full environmental impact analysis.

The close proximity of sensitive receptors to the Project is especially troubling given the appellants' expert analysis that provides substantial evidence that the City has significantly undercounted the number of daily truck and passenger vehicle trips the project could bring into the community.²⁹ The expert report reveals that the City has undercounted the number of truck trips by 107%—318 truck trips per day—and that the total number of truck trips is more accurately estimated as 616 per day or 224,840 per year.³⁰ The City's conclusion that the project will have less than significant air quality impacts relies on a volume of trucks that is roughly half what it should be, and this infects the entire analysis, including the City's evaluation of health risks, noise impacts, and traffic impacts.

In addition to our concern about the significant impacts associated with additional trucks entering the area, we have concerns about the historical contamination located at the Project site. The site has a long history of industrial uses, including as a railroad substation and switch gallery, nursery, furniture and electrical cord manufacturing, and a gas station.³¹ There is evidence of releases of chemicals at the site, including tetrachloroethylene, trichloroethene, petroleum hydrocarbons, and heavy metals.³² There appears to be one underground storage tank abandoned in place and two underground storage tanks that are unaccounted for.³³ The MND

²⁶ Some homes are located in between the Project and the freeway along Redondo Beach Boulevard (along the likely truck route) and to the north east of the Project, between the Rosecrans Recreation Center and the freeway.

²⁷ Air Quality Study, at p. 71.

²⁸ *Id.* at p. 69.

²⁹ Talaro Appeal, Exhibit B, SWAPE Comments, at pp. 4-8.

³⁰ *Id.* at p. 6.

³¹ *Id.* at pp. 1-2.

³² *Id.* at p. 2.

³³ *Id.* at pp. 2-3.

does not study the impacts of any necessary clean up activity, including the generation of contaminated dust that workers and nearby sensitive receptors could be exposed to. Rather than study these foreseeable impacts, the City requires the applicant to obtain environmental reports relating to the site and submit to regulatory agencies “evidence . . . that the site has been adequately remediated and that the project would not constitute a health risk to the environment or the public.”³⁴ Similarly, the Letter of Determination requires the applicant to get approval from appropriate regulatory agencies for plans to handle hazardous materials from the site.³⁵ These reports and evidence must be gathered and analyzed, and the impacts from any necessary cleanup activity mitigated, through the development of an EIR before Project approval.

B. The City Has Not Analyzed nor Mitigated the Project’s Significant Cumulative Impacts

CEQA requires a lead agency to consider whether a project’s effects, while limited on their own, are “cumulatively considerable” and therefore significant. “Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.³⁶ This requires a lead agency to determine whether pollution from a proposed project together with any pollution the community is already exposed to will be significant.

The City concludes that the Project’s impacts even when combined with the effects of other projects is less than significant. In its Air Quality Study, the city contends that the cumulative air quality impact analysis must be “generic” because the “greatest source of emissions is from mobile sources” which travel outside the project area.³⁷ While it admits that the Project will have incremental impacts on the already degraded local air quality, it concludes that because the Project will not exceed SCAQMD’s significance thresholds, it will not have a significant cumulative impact.³⁸ Similarly, even though the ambient cancer risk in the Project area is double that of the county-wide cancer risk—the cancer risk is 993.3 in one million in the Project area versus 415 in one million countywide—the City concludes the Project’s cumulative impacts are less than significant because the Project’s contribution to the cancer risk does not meet SCAQMD’s threshold for that criteria.³⁹

³⁴ Letter of Determination, Condition 39, at p. C-7.

³⁵ *Id.* at Condition 40, at p. C-7.

³⁶ Pub. Resources Code § 21083, subd (b)(3).

³⁷ Air Quality Study, at p. 60.

³⁸ *Id.* at pp. 60-61.

³⁹ SCAQMD’s comments on the MND calls into question whether the Air Quality Study’s health risk assessment adequately calculated the cancer risk because it averaged the diesel exposure over 30 years instead of acknowledging the reality that the exposure would be higher in the early years of the Project than in the later years, exposing the children present during the earlier years to higher diesel levels and a correspondingly higher cancer risk.

The City does not analyze the existing diesel pollution generated by the I-110 freeway that is 650 feet away from the Project and even closer to some of the nearby sensitive receptors, nor does it discuss the Project's contribution to that known source of air pollution or its impact on the surrounding community. Air pollution studies indicate that residents living up to 1,000 feet away from freeways experience higher adverse health impacts than those who live further away from freeways, including a variety of respiratory symptoms, asthma, and decreased lung function in children.⁴⁰ Proximity to freeways increases cancer risks as well.⁴¹ Because of this, state law restricts the siting of new schools within 500 feet of a freeway.⁴² Yet, the City has not analyzed whether the Project with its expected contribution to air pollution would be cumulatively considerable when added to the air pollution from the nearby freeway. This is particularly necessary given the close proximity of the surrounding sensitive receptors, both to the freeway and the Project.⁴³

Furthermore, nowhere does the City acknowledge or study the cumulative impacts of the nearby construction demolition debris recycling facility, which would have a shared access point with the Project on Orchard Avenue. That facility can reasonably be expected to draw heavy duty trucks and vehicles into the area, such that even if the Project impacts alone were not significant, when combined with the existing truck traffic generated by the recycling facility, the impacts could be cumulatively considerable. Other impacts could become cumulatively considerable when considered in combination with the recycling facility's nearby operation, including noise, air quality, odors, water quality, and hazardous materials. The significance of the Project's impacts must be evaluated when combined with the impacts associated with these other nearby projects and activities.

C. The City Has Not Included All Feasible, Enforceable Mitigation Measures.

CEQA prohibits agencies from approving projects with significant environmental effects where there are feasible mitigation measures that would substantially lessen or avoid those effects.⁴⁴ The lead agency is expected to develop mitigation in an open public process.⁴⁵ "The development of mitigation measures . . . is not meant to be a bilateral negotiation between a project proponent and the lead agency after project approval; but rather, an open process that also

⁴⁰ CARB Handbook, at p. 8.

⁴¹ *Id.*, at p. 9

⁴² Pub. Resources Code, § 21151.8.

⁴³ Rosecrans Recreation Center appears to be about the same distance away from the freeway as the Project, or 700 feet. As a result, the children who play at that park would be exposed to the freeway pollution as well as the Project's pollution. Homes north and south of the Project are well within 1,000 feet of the freeway.

⁴⁴ Pub. Resources Code, § 21100, subd. (b)(3).

⁴⁵ *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 93.

involves other interested agencies and the public.”⁴⁶ Mitigation measures must be fully enforceable and cannot be deferred to a future time.⁴⁷

The MND asserts that its relatively limited mitigation measure III-0, which limits the VOC content for architectural coatings, mitigates the air quality impacts of the Project. Additional mitigation measures identified in the Air Quality Study and ultimately included in the Letter of Determination likewise do not address the mobile source emissions.⁴⁸ But the impacts of the Project primarily come from the increase in mobile sources in the area.

The City attempted to address some of CARB and SCAQMD’s comments about the inadequate mitigation of the Project’s impacts. While some improvements were made, such as an increase in electric vehicle infrastructure and parking,⁴⁹ most of the conditions that were added to address the air pollution control agencies’ concerns are unenforceable. For example, the conditions include requiring truck routes to be developed, adopted, and clearly marked, all at some future point without additional City review or input and with the single criteria that trucks should not enter residential areas. It is not clear what the City means by preventing trucks from entering residential areas, since the Project is surrounded by residential areas and the only access to the Project involves truck routes that pass by homes. Some of the homes where trucks would traverse are well within the 1,000 feet of the I-110, where health impacts from exposure to the freeway’s pollution would be expected to occur. The City must define truck routes and analyze them as part of Project’s environmental review and approval.

Further, the City purports to limit the daily number of trucks allowed at the Project to 338 (the amount analyzed by the City’s initial studies), but this limitation is an unenforceable recommendation. The Letter of Determination states that “[i]f higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to reevaluating the project through CEQA prior to allowing this land use or higher activity level.” Since the MND and the initial studies analyze the Project based on the assumption that the number of truck trips would be 338, this unenforceable mitigation measure calls into question the entire environmental analysis, especially the noise, odor, traffic, air quality, and health risk assessment analyses.

These conditions were added after the MND’s comment period concluded and the hearing was conducted, appearing for the first time in the final Letter of Determination adopted and published by the City Planning Commission on March 16, 2018. Contrary to CEQA’s purpose of having an open process for developing mitigation measures, the public did not have an opportunity to review or comment on them. They are not addressed in the City’s Mitigation Monitoring Program.

⁴⁶ *Ibid.*

⁴⁷ CEQA Guidelines, § 15126.4

⁴⁸ The Air Quality Study identified only three mitigation measures, 1) limiting VOC content in architectural coatings, 2) requiring recycling programs to reduce waste going to landfills, and 3) requiring building structures to meet green building code standards.

⁴⁹ Letter of Determination, Conditions 6 and 8, at pp. C-1-C-2

Some of CARB's and SCAQMD's recommended mitigation measures are not incorporated or addressed by the City at all, including the following: (1) requiring 2010 model year or newer haul trucks be use to reduce emissions; (2) requiring an accelerated phase-in of non-diesel-powered truck if the Project generates significant regional emissions; (3) creating a buffer zone that could be office space, greenbelt, or parking of 1,000 feet between the warehouse and the nearby sensitive receptors; and (4) ensuring that trucks queue well inside the Project boundaries (not near sensitive receptors). These mitigation measures must be considered by the City and if infeasible, that explanation must be provided.

II. LOS ANGELES CITY CODE VIOLATIONS

The Project requires a conditional use permit because it is a "major development project" creating more than 250,000 square feet of warehouse floor area. (Los Angeles Municipal Code section 12.24-U 14(a).) To approve this permit, the City must find that the "project's location, size, height, operations, and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety." (Los Angeles Municipal Code section 12.24-E 2.) The City finds that given "it's relative isolation from sensitive uses, and its proximity to Harbor Freeway I-110, the proposed [project] will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety." That finding is unsupported. The location of the freeway, a constant source of air and noise pollution for the community, cannot be used as the basis for the City's assertion that the Project will not adversely affect the Harbor Gateway North community. The statement that the Project is isolated from sensitive receptors also is not supported by the evidence before the City. Furthermore, the City's findings rely on the MND's inadequate environmental impacts analysis to reach this conclusion.

CONCLUSION

The City has provided some information regarding the foreseeable significant environmental impacts of the large industrial warehouse Project and incorporated some mitigation measures to reduce those significant environmental impacts. Nevertheless, it has not fully studied or addressed the potential significant and cumulative environmental impacts that the nearby sensitive receptors will be exposed to as a result of the Project and has not included all feasible, enforceable mitigation measures to reduce those impacts, as required by CEQA. The already overburdened nearby community is entitled to full disclosure and mitigation of the environmental impacts of the Project prior to its approval.

September 5, 2018

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Sincerely,



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Supervising Deputy Attorney General

For XAVIER BECERRA
Attorney General

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