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HARBOR GATEWAY NORTH NEIGHBORHOOD COUNCIL

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September 30, 2021

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

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

Dear Ms. Afshar:

On September 29, 2021, our Board voted x-x-x to submit the following comments on the Draft Environmental Impact Report for the Prologis Vermont and Redondo Project at 15116-15216; 747-861 W. Redondo Beach Blvd:

The Harbor Gateway North Neighborhood Council Planning and Land Use Committee has reviewed and evaluated the Draft Environmental Impact Report for the proposed Vermont Prologis Vermont and Redondo Project and the review of the DEIR made by Crable & Associates, the environmental consulting company hired by the HGNNC to assist with the evaluation.

Our assessment and recommendation is to conclude that there are areas of the current Draft that are inadequate for evaluating the impact of the Project. These areas should be comprehensively addressed and results included in a revised Draft before the Final EIR is issued. As a result of Crable & Associates analysis, we believe the Draft EIR requires significant work to address vagueness and inconsistencies. Without the DEIR being reissued with the additional information and clarifications, It is not possible for us to be conclusive as to the actual environmental impacts of the proposed Project to the surrounding community as opposed to the stated benefits of approving the Project.

Among the areas requiring substantial clarifications are below, with highlighted sections from the Crable and Associates Report:

Air Quality

The EIR should include analysis of air pollution other than NO_x, such as fine particulate matter and tire particles that are as impactful as NO_x, but not analyzed in the DEIR.

The analyses in this section, the Health Risk Assessment, and the Friant Ranch and environmental justice analyses documentation contained in Appendix C—Air Quality and Greenhouse Gas Emissions Technical Modeling, appears to provide enough substantial evidence to support the agency's conclusions.

Greenhouse Gas Emissions

NO_x and CO₂ levels will be over the AQMD threshold and cannot be mitigated.

The DEIR should be revised to reflect that the Project has a significant cumulative impact on GHG that can't be mitigated below a level of significance.

Land Use and Planning

The DEIR left out any study of the conflicts between the existing Harbor Gateway Community Plan and the updated Community Plan with zoning for the site as hybrid industrial instead of light industrial. These plans are not speculative or insignificant, but likely to come into force before the proposed project would be complete and will slowly re-figure our neighborhoods. As such seeing it as a preceding event is unjustified, nor can the new plans/zoning be ignored in their analysis.

The DEIR does not address the proposed land use change from M2 to HI. Although the HI zone permits light industrial uses such as the Project, it includes uses, such as residential and hotel, that are not consistent with the M2 zone. Therefore, the Project would conflict with the General Plan and Zoning Code. This plan inconsistency must be addressed in the DEIR.

The DEIR should be revised to reflect an analysis of the site land use change proposed in the HGCP Update and any potential conflict to Land Use and Planning that might occur from the development of the proposed Project.

Noise

The methods of measuring sound impact and absence of any serious modeling of mitigation measures (their 14 foot CMU wall) is inadequate for the conclusion of no-impact made in the DEIR. Please reference stakeholder Micah Silver's submitted public comment on this in more detail.

Transportation

Traffic impact of Vermont Avenue/Redondo Beach Blvd intersection and at the south and north entrances to the I-110 freeway at Redondo Beach Blvd will be significant and in the DEIR this is under-reported based on their method of analysis.

The LOS analysis shows the Project will affect local circulation/residents adversely with no mandatory mitigation measures offered. Coupled with the significant and unavoidable Air Quality impacts, primarily caused by the transportation element of the Project, and the disproportionate effect on the local population already burdened by transportation emissions, it seems an Alternative Analysis should have considered an off-site analysis for a site in a similarly zoned area of the Harbor Gateway, or an Alternative that would reduce the AQ effects of NOx below a level of significance.

Also, the DEIR should analyze a No Project/existing zoning alternative using permitted uses in the HI land use designation contained in the draft HGCP Update.

Alternatives

A more thorough analysis of alternative uses for the site is needed. For example, a smaller warehouse of 255,224 square feet, their proposed warehouse located at a different location within Harbor Gateway, and alternative uses for the site newly permitted under the hybrid industrial zoning.

The analysis contained in this section appears to provide enough substantial evidence to support the agency's conclusions. However,

- (1) An Alternate Location analysis should be prepared at least to the degree to substantiate the claims that such an analysis would result in the below (unsubstantiated) findings that:
 - the Project Applicant cannot reasonably acquire, control, or access an alternative site of similar size within the Harbor Gateway along Figueroa Street north of Rosecrans Avenue area;
 - an alternative site within the Harbor Gateway area would result in the same significant and unavoidable impacts associated with air quality;
 - a change in location that could potentially be closer to sensitive uses could result in greater environmental impacts when compared to the Project.
- (2) The DEIR does not analyze land uses permitted in the HI land use designation as proposed in the draft HGCP for the site, which include residential, mixed-use, and hotel. Because the Alternative Land Use analysis was conducted without contemplating the proposed HI land use designation, this analysis is incomplete and/or inaccurate. This section should be revised using the HI land use proposed in the draft HGCP Update.
- (3) *Alternatives to Eliminate Significant Air Quality Impacts* could acknowledge that a reduced project could meet 4 of the 5 Project objectives to some degree while eliminating the some of the significant impacts of NOx.
- (4) The No Project/No Build Alternative scenario is an unrealistic project alternative that does not comport with CEQA nor contribute to a useful CEQA analysis.
- (5) Alternative B: Existing Zoning Alternative does not consider the proposed HI zoning for the site. Because the Existing Zoning Alternative analysis was conducted without contemplating the proposed HI land use designation, this analysis is incomplete and/or inaccurate. This section should be revised using the HI land use proposed in the draft HGCP Update.

(6) Alternative C: Reduced Project Alternative could reduce significant LOS impacts that result from the Project, but they are not analyzed. The DEIR should model the LOS traffic impacts from this scenario to provide more information to stakeholders and decision makers so they can make a more informed decision. Also, it is possible this alternative could meet 4 of the 5 Project objectives to some degree while eliminating the significant impact of LOS at 3 locations in the Project area and reducing the significant effects of NOx.

We recommend that the issues raised in the Crable & Associates report on the DEIR be fully addressed, along with the other issues brought to the attention of the Department of City Planning by our stakeholders through their public comments, including the issue of environmental justice, a key topic also raised in the Draft Policy Document for the updated Harbor Gateway Community Plan.

Sincerely,

Joan Jacobs, Vice 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
Rob Bonta, Attorney General of California
California Air Resources Board
South Coast Air Quality Management District
Scott Mulkay, Vice President, Regional Construction and Development Manager - Western
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