Communication from Public

Name:	Janet L.
Date Submitted:	10/10/2025 12:33 PM
Council File No:	18-0279-S1
Comments for Public Posting:	I strongly urge you to withdraw, revise, and recirculate the Environmental Impact Report for the Prologis warehouse at 747 W. Redondo Beach Blvd. The current plan allows excessive air pollution from 768 daily diesel truck trips and 24-hour operations, which will severely impact our neighborhood, including homes, schools, and senior care centers. The proposed mitigation measures are inadequate, and the project is incompatible with the surrounding community, which is already overburdened by pollution.

Communication from Public

Name: Sierra Club, Palos Verdes-South Bay Regional Group
Date Submitted: 10/10/2025 01:26 PM
Council File No: 18-0279-S1
Comments for Public Posting: From Sierra Club, Palos Verdes-South Bay Regional Group The proposed Project would be a massive warehouse, to be operated 24 hours/day, 7 days/week in the midst of residential neighborhoods which are already severely impacted by proximity to the freeway and rail lines. The Sierra Club is very concerned about a number of significant environmental impacts that may result from this project. We are particularly concerned about the potential health impacts to residents in the surrounding neighborhoods from air pollution from trucks. We are also concerned about project impacts including greenhouse gases, noise, lighting, and traffic. This warehouse project, if built, would impose an environmental injustice upon the area. Our comments on the Final EIR are attached. Our comments on the DEIR are also attached, since the FEIR did not adequately respond to all the issues we raised. In particular, we emphasize here that the mitigation measures proposed are inadequate, and several additional ones should be used. Install heavy-duty electrical infrastructure to have capacity to charge at least 10 trucks, especially medium-duty electrical trucks which are currently in use. Install as many photovoltaic panels on the roof as will fit. Require that truck engines meet the latest California emission standards, rather than 2010. Do not allow truck traffic at night. Limiting night-time truck trips to "only" 105 trips between the hours of 10pm and 5am means that there would be, on average, a truck every four minutes. With 768 trips per day, trucks would be arriving, on average, every 2 minutes.

SIERRA CLUB

Palos Verdes- South Bay Group / Angeles Chapter

ENVIRONMENTAL CASE NO.: ENV-2017-1015-EIR

PROJECT NAME: Prologis Vermont and Redondo Project

October 3, 2021

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

By email to: jivar.afshar@lacity.org

Dear Ms. Afshar:

INTRODUCTION

The Palos Verdes-South Bay Group of the Sierra Club appreciates this opportunity to comment on the DEIR for ENV-2017-1015-EIR, Prologis Vermont and Redondo Project. The proposed Project would be a massive warehouse, to be operated 24 hours/day, 7 days/week in the midst of residential neighborhoods which are already severely impacted by proximity to the freeway and rail lines.

The DEIR is flawed and inadequate and should not be approved.

FLAWED AND INCOMPLETE ANALYSIS OF AIR QUALITY IMPACTS

The DEIR states that the Air Quality section relies on the information, data, and assumptions provided in *Air Quality and Greenhouse Gas Emissions Technical Modeling*, PlaceWorks, February 17, 2020. (the Model) Solely relying on modeling as a decision-making determinant has two risks:

1. the quality and accuracy of input data that the model is based upon
2. the margin of error of the model results

The Technical Modeling provided seems to rely on an arbitrary and speculative baseline

The DEIR does not seem to provide any firm reference explaining limits on the number of truck trips or the mix of truck types that could occur per day on the project site. The DEIR arbitrarily states that the Model is based on an estimate of 766 (203 heavy heavy-duty and 181 medium heavy-duty trucks) truck trips per day, without giving any supportive explanation or documentation for that number or mix of trucks.

Furthermore, Appendix B of the Health Risk Assessment (Pg. 1078, Appendix C) appears to state that Medium-Heavy Duty Trucks produce about 1.2 - 1.5 times greater DPM per mile than Heavy-Heavy-Duty Trucks, and about 6 times more DPM per hour when idling. Therefore, a different mix of trucks from what is assumed in the model could produce significantly different health effects.

Heavy-Heavy Duty Trucks
Idling Emissions (g/sec) 1.08E-05
Medium-Heavy Duty Trucks
Idling Emissions (g/sec) 6.26E-05

If there were more trucks using the site than the model predicts, or if the mix of truck types produced more emissions than the model's assumptions, then the actual truck emissions during the Project Operations could potentially be significantly greater than what is indicated in the DEIR.

The baseline model data is therefore too flimsy, vague and potentially underestimated to be relied upon to provide an accurate prediction of Project Operations air pollution health impacts. This is especially concerning because the DEIR seems to rely entirely on the model, rather than consider any epidemiological evidence to predict health effects from the proposed Project.

The DEIR also does not address a scenario where trucks may be queued up on residential streets
There is no description of any management or scheduling scenario for truck arrivals. It could therefore be possible for multiple trucks to be queued up outside of the facility when the bays are being used at capacity. Although the DEIR claims that the trucks would be limited to 15 minutes idling time, it is not clear that such limits would or could extend beyond the project boundaries. Thus, trucks could be idling on residential streets. Such potential additional impacts need to be considered.

Furthermore, in a congested situation, frequent startups of trucks that had been shut down from idling could also contribute to excess pollution and noise. According to the Coalition for Clean Air, NO_x emissions of newer trucks equipped with SCR technology are much higher at low speeds, during engine start and while idling.[5] These factors must also be evaluated and included in the DEIR.

The DEIR also should include evaluation of impacts from the use of diesel Transport Refrigeration Units (TRUs) even though such use is not currently proposed.

Potential maximum truck emissions would significantly increase health risks
The Health Risk Assessment model was used to calculate the health impact of Toxic Air Contaminants on people in adjacent homes, schools, nursing homes, a park and recreation area ("sensitive receptors"). As a result of this calculation, the DEIR states that the health impact for the closest sensitive receptor (a multi-family residence) would be below the regulatory threshold of 10 excess deaths per million. However, the assumptions used for the model seem to be arbitrary and factually unsupported, and the model predictions are therefore highly questionable.

The Health Risk Assessment model (Pg. 1056, Appendix C) calculates 5.2 per million excess cancer deaths for the closest residence for the Operation phase. But since the maximum truck emissions could potentially be significantly higher than what the model assumes, the cancer risk could potentially be much higher, reaching or exceeding the threshold of 10 excess deaths per million.

It is not clear whether the model includes cumulative health impacts
Local Sensitive Receptors are already burdened by serious background pollution levels generated by the nearby freeway, railroad, and other sources. The cumulative impact of the addition of Project impacts to the background level of pollutants must be evaluated and discussed in the DEIR. It is not reasonable to only consider project impacts in isolation.

Epidemiological Evidence of Health Risks associated with Proximity to Roadways and Warehouses must be acknowledged and fully discussed in the body of the DEIR
The Health Risk Assessment Model conclusions do not seem to be consistent with decades of published epidemiological evidence. There is a long record of studies showing that the proximity of sensitive receptors to freeways and warehouses is directly correlated with adverse health effects. The DEIR fails to address this significant body of information.

Epidemiological studies sometimes do not single out particular contaminants, such as NO_x, DPM, etc. individually. However, such studies frequently do make clear the pollution source points, which may include multiple air quality contaminants.

The DEIR should have included the California Air Resources Board (CARB) *AIR QUALITY AND LAND USE HANDBOOK: A COMMUNITY HEALTH PERSPECTIVE* which includes graphs which clearly demonstrate higher concentrations of pollutants associated with increased proximity to freeways and warehouses.

Because of the known association between higher concentrations of pollutants with adverse health effects, CARB Guidelines continue to recommend the avoidance of "sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week)."

It is true that air quality has been improving due to CARB's restrictions on diesel truck standards. However, reliance on truck standards alone is not enough. Appropriate planning addressing the proximity of Sensitive Receptors to sources of pollution and correcting incompatible land use designations is another key mitigation method necessary to protect public health.

The Office of Environmental Health Hazard Assessment (OEHHA) revised its guidelines in 2015, acknowledging that infants and children are more susceptible to air toxics than adults, and changed the way cancer risk is estimated to take this into account. As a result, it is no longer appropriate to average out Diesel Particulate Matter (DPM) or other pollutants over a 70 year exposure duration because doing so could underestimate the cancer risk to infants and children.

Furthermore, scientific studies have been finding that many detrimental health effects can be attributed to concentrations of pollutants that are much lower than those originally identified as problematic. Recent studies have also shown increased vulnerability to pollutants of concern in certain segments of the population, including infants and children, the elderly, and individuals already burdened by health conditions such as asthma.

COVID-19

The DEIR must make a reasonable effort to connect the project's Air Quality Impacts to likely health consequences. Recent research has indicated that:

- exposure to consistent small doses of air pollution can increase the likelihood of contracting COVID-19, increase the severity of the effects of the disease, and increase the likelihood of dying from it. [1]
- an increase of only 1 µg/m3 in PM2.5 exposure is associated with an 8% increase in the likelihood of dying from COVID-19 [2]
- PM2.5 exposure contributed to approximately 15% of COVID-19 deaths worldwide [3]
- "long-term exposure to this pollutant [nitrogen dioxide or NO2) may be one of the most important contributors to fatality caused by the COVID-19 virus." [4, 5]

Los Angeles neighborhoods with the worst air pollution have experienced a 60% increase in mortality from COVID-19 compared to Los Angeles neighborhoods with the best air quality.[6]

Additional Air Quality Concerns

We are also concerned that the Health Risk Assessment only addresses pollutants of concern individually. The model does not address potential impacts of synergistic reactions and combinations of contaminants on human health. Such interactions are complex and their complete analysis would be beyond the scope of a DEIR. However, the DEIR should at least acknowledge that compound exposures of pollutants of concern may have health impacts beyond those that might occur due to a single pollutant in isolation. These types of synergistic effects may be best evidenced in epidemiological studies rather than relying on simple modeling alone. Thus, the need for the DEIR to fully address existing epidemiological studies is even more compelling.

FAILURE TO MITIGATE IMPACTS TO SENSITIVE RECEPTORS IN A TIMELY MANNER

The DEIR attempts to argue that impacts from Toxic Air Contaminants will be moot once cleaner diesel truck standards are observed in 2030. In fact, Table IV-B-20 in the DEIR goes so far as to suggest that the Project itself would result in a benefit to public health in the future! Such a portrayal would be laughable, if the consequences were not so dire. Table IV B 20 is misleading because it omits the No Project Alternative which would illustrate greater reductions in contaminants without the project.

In reality, health impacts to nearby residents would begin as soon as construction begins, and would continue during the operational phase. It is not conscionable to ignore almost a decade worth of severe health impacts to neighborhood residents and other Sensitive Receptors.

It is not enough to suggest such **deferred mitigation**. The increased impacts to people in the residential community surrounding the proposed Project would be immediate, profound and long lasting. Project impacts could have lifelong detrimental health effects on members of the community and could even be serious enough to result in premature deaths.

The best mitigation is avoidance of impacts.

Rather than defer mitigation of impacts to local residents, it would be more reasonable to advocate deferred project implementation until such time as the suggested mitigation measures are actually feasible to be implemented and enforced at the start of the project.

LEGACY CONTAMINATION ON THE PROJECT SITE MUST BE REMEDIATED FIRST

The DEIR mentions existing environmental contamination known to be on the project site but defers further definition or examination of the extent of such contamination or remediation status. We agree with the statements made by the California Attorney General that analyzing and cleaning up the legacy of environmental contamination on the project site should precede any approvals for development on that site. Remediation of soil contaminants must be completed before any grading or other disturbance begins on the project site.

HAZARDOUS MATERIALS

The future Project tenants have not been defined. The DEIR fails to include any discussion of transportation and handling of hazardous materials. If the presence of such materials on the project site is not explicitly prohibited, the potential impacts to the health and safety of the community could be enormous. This risk should be fully discussed in the DEIR and needs to be mitigated.

INADEQUATE ANALYSIS OF CURRENT SETTING

Section 15125(a)(1) of CEQA states "*where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by ...conditions expected when the project becomes operational... that are supported with substantial evidence."*

Furthermore, Section 15125(d) states that *"The EIR shall discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans."*

In that light, the DEIR has given a distorted picture of the environmental setting for this proposed Project because it has failed to mention the ***Draft Update to the Harbor Gateway Community Plan*****,** which has already been submitted to the City of Los Angeles for Environmental Review. That Community Plan would remedy existing zoning incompatibilities and restrict allowable uses to those compatible with the existing surrounding residential neighborhoods.

The DEIR should discuss and acknowledge the Draft Harbor Gateway Community Plan, which has been developed consistent with broad goals articulated by the City of Los Angeles to update the General Plan with a particular focus on Environmental Justice. To ignore a potential remedy to the Significant Impacts resulting from existing zoning incompatibility would be to perpetuate environmental impacts that could otherwise be avoided.

INADEQUATE ARRAY OF ALTERNATIVES

The inadequacy of Alternative choices reviewed in this DEIR is a substantial deficiency, and for that and other reasons the Sierra Club recommends that the DEIR not be approved. We strongly disagree with the DEIR's determination to omit evaluation of the following Project Alternatives:

Alternative Land Use should have been included in the DEIR in light of the currently proposed rezoning in the Draft Harbor Gateway Community Plan.

Alternatives to Eliminate Significant Air Quality Impacts should have been included in the DEIR since impacts from the proposed Project would "*account for approximately 131 lbs. per day of the 135 total lbs. per day of NOx emitted from all project sources after mitigation*" (pg. V-5)

The DEIR discussion of Alternatives states that "*In order to reduce the Project-related NOx emissions from 135 pounds per day ... below SCAQMD's regional operation significance threshold of 55 pounds per day, the Project would need to be reduced by 60 percent. A 60-percent reduction of the Project would not support the Project's main objectives to the same degree as the Project*". (pg V-5)

However, the DEIR does not state that a 60 percent reduction of the Project would be unreasonable. Meanwhile, CEQA Section 155126.6 (b) states that "*...the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives*"

INADEQUATE DETAIL OF ALTERNATIVES PRESENTED

Alternative C: Reduced Project Alternative

The DEIR's description of Alternative C fails to include adequate information for full evaluation of its impacts, which is particularly important given that the DEIR names Alternative C as the Environmentally Superior Alternative.

The DEIR's description of Alternative C is missing critical information, including, but not limited to, the number of truck bays and the proposed Project footprint in that Alternative. The DEIR fails to specifically indicate the proximity of Operations to Sensitive Receptors for Alternative C. Therefore, the DEIR has not provided enough information to evaluate whether Alternative C would result in any changes to compliance with CARB recommendations for reducing Air Quality impacts to public health.

However, the DEIR does state that Alternative C would not reduce Project size sufficiently to avoid Significant Air Quality impacts. Therefore, in order to be a meaningful Alternative, Alternative C should be rescaled to a 60 percent reduction, as discussed above, and re-evaluated at that scale.

CEQA clearly states that avoiding environmental impacts and providing a safe living environment for all Californians are priorities in evaluating any project proposal

CEQA Section 15021 sets forth the ***DUTY TO MINIMIZE ENVIRONMENTAL DAMAGE AND BALANCE COMPETING PUBLIC OBJECTIVES.*** Section15021(a) states that (1)" *agencies are required to give major consideration to preventing environmental damage*." and (2)" *A public agency should not approve a project as proposed if there are feasible alternatives or mitigation measures available that would substantially lessen any significant effects that the project would have on the environment."*

Furthermore, Section 15021(d) states that "***a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian****. "*

Conclusion

The DEIR for ENV-2017-1015-EIR Prologis Vermont and Redondo Project is flawed, misleading and inaccurate. We find numerous issues of arbitrary and unsupported assumptions in its analysis of truck trips and resultant air quality impacts. Furthermore, the analysis of health effects from pollutants generated by the proposed project fails to adequately consider existing epidemiological evidence associating concentrations of pollutants with a variety of health impacts. The DEIR also fails to acknowledge that such health impacts are directly correlated with the proximity of sensitive receptors to the source point of the pollution. For these reasons, the DEIR is not worthy of approval.

Sincerely,

/s

MC
Chair
Palos Verdes-South Bay Group
Sierra Club

1. Andrée, Pieter Johannes, April 2020, Incidence of COVID-19 and Connections With Air Pollution Exposure: Evidence From the Netherlands

2. Xiao Wu, Rachel, et al., April 27, 2020, Exposure to Air Pollution and COVID-19 Mortality in the United States: A Nationwide Cross-Sectional Study

3. Pozzer, Andrea, et al., September 30, 2020, Regional and Global Contributions of Air Pollution to Risk of Death From COVID-19, *European Society of Cardiology*

4. Ogen, Yaron, April 11, 2020, Assessing Nitrogen Dioxide (NO2) Levels as a Contributing Factor to Coronavirus (COVID-19) Fatality, *Science of the Total Environment*

5. Coalition for Clean Air, August 25, 2021, Comments on Revised Draft Environmental Impact Report for the Southern California International Gateway Project

6.Natural Resources Defense Council, East Yard Communities for Environmental Justice,
Century Villages at Cabrillo, August 25, 2021, Public Comments on the Revised Draft Environmental Impact Report for the SCIG Project (SCH #2005091116)

P. O. Box 2464 , Palos Verdes Peninsula, California 90274