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Your Community Impact Statement Submittal - Council File Number: 18-0279-S1

LA City SNow <cityoflaprod@service-now.com>
Reply-To: LA City SNow <cityoflaprod@service-now.com>
To: Clerk.CIS@lacity.org, rosalieannp@hotmail.com

Tue, Aug 19, 2025 at 7:33 PM

A Neighborhood Council Community Impact Statement (CIS) has been successfully submitted to your Commission or City Council. We provided information below about CISs and attached a copy of the CIS.

We encourage you to reach out to the Community Impact Statement Filer to acknowledge receipt and if this Community Impact Statement will be scheduled at a future meeting. Neighborhood Council board members are volunteers and it would be helpful if they received confirmation that you received their CIS.

The CIS process was enabled by the to Los Angeles Administrative Code §Section 22.819. It provides that, "a Neighborhood Council may take a formal position on a matter by way of a Community Impact Statement (CIS) or written resolution." NCs representatives also testify before City Boards and Commissions on the item related to their CIS. If the Neighborhood Council chooses to do so, the Neighborhood Council representative must provide the Commission with a copy of the CIS or resolution sufficiently in advance for review, possible inclusion on the agenda, and posting on the Commission's website. Any information you can provide related to your agenda setting schedule is helpful to share with the NC.

If the CIS or resolution pertains to a matter *listed on the Commission's agenda*, during the time the matter is heard, the designated Neighborhood Council representative should be given an opportunity to present the Neighborhood Council's formal position. We encourage becoming familiar with the City Council's rules on the subject. At the Chair's discretion, the Neighborhood Council representative may be asked to have a seat at the table (or equivalent for a virtual meeting) typically reserved for City staff and may provide the Neighborhood Council representative more time than allotted to members of the general public. They are also permitted up to five (5) minutes of time to address the legislative body. If the CIS or resolution pertains to a matter *not listed on the agenda*, the designated Neighborhood Council representative may speak during General Public Comments.

We share this information to assist you with the docketing neighborhood council items before your board/commission. If you have questions and/or concerns, please contact the Department of Neighborhood Empowerment at empowerla@lacity.org.

***** This is an automated response, please DO NOT reply to this email. *****

Contact Information

Neighborhood Council: Harbor Gateway North

Name: Rosalie Preston

Email: rosalieannp@hotmail.com

The Board approved this CIS by a vote of: Yea(7) Nay(1) Abstain(0) Ineligible(0) Recusal(1)

Date of NC Board Action: 04/22/2025

Type of NC Board Action: Against

Impact Information

Date: 08/20/2025

Update to a Previous Input: No

Directed To: City Council and Committees

Council File Number: 18-0279-S1

City Planning Number:

Agenda Date: 09/09/2025

Item Number:

Summary: The Harbor Gateway North Neighborhood Council Board voted to oppose the certification of the Final Environmental Impact Report (FEIR) for the Prologis Vermont and Redondo Project due to serious environmental, health, planning, and procedural concerns that remain unaddressed despite multiple rounds of public input. Per the State Attorney General's "Warehouse Best Practices September 2022" "imprudent warehouse development can harm local communities and the environment. Among other pollutants, diesel trucks visiting warehouses emit nitrogen oxide (NOx)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particulate matter that is smaller than 2.5

micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death. Trucks and onsite loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure. The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate contribute to traffic jams, deterioration of road surfaces, and traffic accidents.” In reviewing the Final EIR, we note these areas of concern that were not adequately evaluated or without suitable mandated mitigations for their impact on our environmental justice community, which already experiences a high air pollution burden from the I-110 and the operations of the construction debris recycling center, California Waste Services, [621 W, 152nd Street](#). The failure to adequately assess cumulative impacts, propose feasible mitigations, and meaningfully respond to community and agency concerns necessitates recirculation of the EIR under CEQA.



HGNNC letter Prologis Final EIR 4-22-2025.pdf

354K

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Oscar Ruiz - District 8 Representative
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Finesse Simmons - Youth Representative
Outreach/Communications Rep - vacant
Craig Kusunoki - At-Large Representative

HARBOR GATEWAY NORTH NEIGHBORHOOD COUNCIL

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April 22, 2025

Ms. Kiersten Turner
Planning Assistant - Major Projects
Department of City Planning
221 North Figueroa Street - Rm.1350
Los Angeles, CA 900012

Re: Prologis Vermont and Redondo Project, 15116-15216 South Vermont Avenue and 747-861 West Redondo Beach Boulevard (CPC-2017-1014-CU-ZAA-SPR; ENV-2017-1015-EIR)

Dear Ms. Turner:

The Harbor Gateway North Neighborhood Council has reviewed the Final EIR for the proposed 53-foot tall, 340,298 square-foot warehouse/manufacturing/high-cube/warehouse/distribution center, at 15116-15216 South Vermont Avenue and 747-861 West Redondo Beach Boulevard with 71 truck bays, 24/7 operation, and 768 daily truck trips.

On April 22, 2025, our Board voted 7-1-0, with 1 refusal, to oppose the certification of the Final Environmental Impact Report (FEIR) for the Prologis Vermont and Redondo Project, citing serious environmental, health, planning, and procedural concerns that remain unaddressed despite multiple rounds of public input. We submit the following evidence-based comments in opposition to the FEIR certification and project approval.

Per the State Attorney General's "Warehouse Best Practices September 2022" "imprudent warehouse development can harm local communities and the environment. Among other pollutants, diesel trucks visiting warehouses emit nitrogen oxide (NOx)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particulate matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death. Trucks and onsite loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure. The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate contribute to traffic jams, deterioration of road surfaces, and traffic accidents."

In reviewing the Final EIR, we note these areas of concern that were not adequately evaluated or without suitable mandated mitigations for their impact on our environmental justice community, which already experiences a high air pollution burden from the I-110 and the operations of the construction debris recycling center, California Waste Services, 621 W, 152nd Street:

Aesthetics

In regards to the "Scenic Highway" designation of Vermont Avenue north of Redondo Beach Boulevard as a scenic highway, contrary to documentary evidence, the response gives the appearance of bias by Responder. The Responder's selective and misleading interpretation is not supported by State law.

Please refer to:

Scenic Highways - Frequently Asked Questions | Caltrans

The State of California, Scenic Highways FAQ sheet, specifically (i) Elements that make a highway "scenic;" (ii) Definition of a Corridor Protection Program; (and what is included therein); (iii) Can scenic highways be widened or otherwise changed? (Read in its entirety); (iv) Does official designation preclude development; (v) "...some of the benefits of official scenic highway designation ... (bullet Item #4.)

The analysis and conclusion in the FEIR is not supported by evidence. As a result of the omissions, the conclusion should be, per CEQA Guidelines Section 15088.5(a), "***a substantial adverse environmental effect would result from the project. . .***"

Air Quality

Inadequate analysis in the DEIR and FEIR of the impact to nearby sensitive uses of the significant increase in nitrogen oxide (NOx) and especially particulate matter (pm) 2.5 particulates that would be generated by 768 daily truck trips.

No analysis in the DEIR or FEIR of the cumulative impact from the exiting air pollution generated by the construction debris recycling facility California Waste Services, 621 W. 152nd Street, which is currently permitted to have 212 daily truck trips and creates a significant amount of particulate matter (pm) 2.5 from crushing of concrete and other items which are recycled there, and then the additional air pollution from the operations of a warehouse with up to 768 daily truck trips, including from the debris shed from each truck's many tires.

No stipulation regarding a restricted time (such as two minutes) for idling on-site.

There needs to be a requirement for the Permittee to create a minimum of one-million dollars (\$1,000,000) clean-truck incentive program fund and include information about the fund in its agreements with tenants. To promote the use of alternative fuels, money from the fund shall be made available no later than the commencement of operations of the first tenant in the Project and administered as follows: 100 percent of all truck trips to the site shall consist of alternative fuel/near-zero emission or zero-emission trucks in order to meet the objectives of the Clean Truck Incentive Program by 2035.

Land Use and Planning

The updated Harbor Gateway Community Plan, which is near adoption and which the City of Los Angeles delayed updating for fifteen years, would not allow a truck-related usage on the property because of it being surrounded by sensitive uses.

The state underlying purpose of the project is “to redevelop a vacant, underutilized property into a warehouse/manufacturing/high-cube warehouse/distribution center that provides jobs to the Harbor Gateway Community and provides goods to the regional economy.” However, from a community perspective, there are many other uses for the property that could redevelop the underutilized property with community-serving uses that do not have the same type of air quality, noise, and traffic impacts as what is proposed.

The project does not meet many of the State Attorney General’s September 2022 Warehouse Best Practice Document, which sets best practices for siting and design considerations for warehouses including siting “Per California Air Resources Board (CARB) guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.”

AB 98 (Carrillo), which is in effect as of January 2026, sets a 900 foot distance for a warehouse from sensitive uses.

Environmental Justice Policy Program – LA City Planning: “The Plan acknowledges the relationship between public health and issues such as transportation, housing, environmental justice, and open space, among others.” Environmental Justice impacts of the proposed project on the community have not been evaluated and therefore appropriate mitigations have not been required.

Noise

There was no analysis of the impact of additional noise contributed by 768 heavy trucks traveling on Redondo Beach Boulevard and Vermont Avenue past sensitive uses (apartments, homes, schools, churches, care centers, and park), only of noise generated on-site.

24/7 operations should not be granted in order to reduce night-time noise impact on nearby sensitive uses. All hours of operation shall be limited to 7 a.m. to 8 p.m.

The 14-ft sound wall was assumed effective without comparative analysis of alternative heights or configurations. The SoundPLAN model included only a single scenario with the barrier in place. No sensitivity testing or alternative barrier modeling was presented, despite my specific request for such an evaluation.

The responses fail to address whether backup alarms—a major source of nuisance noise—were modeled at all. This is a critical omission, especially for an industrial site with frequent truck maneuvers and reversing. The absence of this modeling renders the results unreliable for assessing real-world impact.

Concern regarding sound reflecting off the north side of the proposed 53-ft building façade was brushed aside. The model used in SoundPLAN suppressed “own façade” reflections, which may be standard practice in some industrial modeling, but is wholly inappropriate in a dense urban environment with proximate residential receptors.

Selective Use of CEQA Metrics obscures Real-World Impact: The response deflects concern about Community Noise Equivalent Level/Equivalent Continuous Sound Level (CNEL/Leq) masking transient noise events by citing CEQA’s preference for those metrics. This avoids the issue: community health is

affected by single-event noise (e.g., coupling, alarms), which these averages fail to capture. A good-faith response would have acknowledged this known limitation rather than hiding behind regulatory convention.

Although the response claims that field measurement logs and photographs were included in Appendix FEIR-2, they are absent from the document. This directly contradicts the written response and undermines the transparency of the noise analysis.

Throughout the responses, the FEIR relies on general claims about the capabilities of SoundPLAN and industry standards rather than demonstrating how the software was specifically used to answer the concerns raised. This amounts to relying on technical jargon that excludes the public from meaningfully understanding the analysis.

Transportation

The impact to the following intersections where large trucks will be turning and entering was not considered at all:

1. Vermont Avenue/Redondo Beach Boulevard
2. Orchard Avenue/Redondo Beach Boulevard
3. Redondo Beach Boulevard/southbound entrance to the I-110

The traffic study solely focuses on the regular automobile traffic generated by those working at the facility and potentially using the 194 surface parking spaces and Vehicle Miles Traveled (VMT). However, VMT does not capture the unique characteristics of large truck traffic.

Must require video monitoring of each truck entrance (Orchard Avenue and Vermont Avenue) with video records made available for the Department of City Planning review for the purpose of verifying compliance with the number of truck trips.

Hydrology

The latest Los Angeles Regional Water Quality Control Board (LARWQCB) findings are not reflected in the FEIR.

Alternatives

A realistic assessment of mitigating the impacts of the proposed project through either reducing the size of the warehouse or not approving the project at all was not made. Either would significantly reduce the air pollution, traffic, and noise impacts of the proposed project.

Other conditions on uses for the building due to its location surrounded by sensitive uses: The warehouse building shall not operate as a cold storage or high cube warehouse facility. Vehicles with transfer refrigeration units are not permitted on the Project Site.

The transfer and storage of any types of hazardous materials are prohibited.

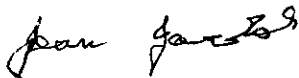
All outside storage, including truck storage outside of designated loading bays, the storage of hazardous materials, and other junk and salvage, is prohibited on the site.

Local Hire Program

Suggestion for consideration of equitable hiring opportunities for both the construction and operation of the Project within the local community (i.e. local hire). The Permittee should offer incentives of a minimum of one-hundred thousand dollars (\$100,000) to the employers of both the construction and operations components of the Project, including investments and appropriate designated local training programs.

For the reasons detailed above, and in recognition of our responsibility to protect the health and well-being of residents, school children, park users, and all sensitive receptors in the Harbor Gateway North area, we strongly oppose certification of this Final EIR (FEIR). The failure to adequately assess cumulative impacts, propose feasible mitigations, and meaningfully respond to community and agency concerns necessitates recirculation of the EIR under CEQA.

Respectfully,



Joan Jacobs, Vice Chairperson

Harbor Gateway North Neighborhood Council

cc: Councilmember Tim McOsler – Council District 15

Pamela Thornton, Planning Director – Council District 15

Rudy Martinez, Field Deputy – Council District 15

South Coast AQMD

California Air Resources Board

Rob Bonta, State Attorney General