

Communication from Public

Name: Paige H. Gosney
Date Submitted: 08/25/2025 05:24 PM
Council File No: 25-0775
Comments for Public Posting: Please see attached letter. Thank you.

Allen Matkins

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Via Electronic Mail

August 25, 2025

Planning and Land Use Management Committee
City of Los Angeles
John Ferraro Council Chamber, Room 340
200 North Spring Street
Los Angeles, CA 90012

**Re: Industrial Stakeholder (BCIF/BTC III) Comment re Agenda Item
No. 11 and 12: CF 25-0774 (Wilmington–Harbor City) and CF 25-
0775 (Harbor Gateway)**

Dear Honorable Members of the Planning and Land Use Management Committee:

This firm represents BCIF Harbor Gateway Logistics Center LP and BTC III Gateway Logistics Center LP (“BCIF/BTC III”) with respect to two existing industrial properties BCIF/BTC III owns and operates located in the Harbor Gateway community in the City of Los Angeles (“City”). On behalf of BCIF/BTC III, for inclusion in the administrative record, we submit this comment letter to the Planning and Land Use Management Committee concerning the Harbor LA Community Plans Update, which includes both the Harbor Gateway Community Plan Update (Council File No. 25-0775; Agenda Item 13) and the Wilmington–Harbor City Community Plan Update (Council File No. 25-0774; Agenda Item 12) (together, the “Proposed Update”). These matters are calendared on the August 26, 2025, PLUM agenda.

BCIF/BTC III, and similarly situated industrial stakeholders, have a substantial and direct interest in the Proposed Update. The regulatory framework established through these proceedings will govern the continued operation, reinvestment, and modernization of legacy logistics and industrial facilities situated within the Harbor districts—facilities that have long served as critical supply-chain infrastructure supporting the Ports of Los Angeles and Long Beach. These facilities not only play an essential role in ensuring the efficient movement of goods through the nation’s busiest port complex, but also sustain thousands of high-wage jobs and generate significant fiscal revenues for the City. For this reason, the policy choices embedded within the Proposed Update carry implications extending well beyond the boundaries of the Harbor Gateway and Wilmington–Harbor City Community Plan Areas.

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As the Committee is aware, the City Planning Commission (“CPC”) conducted its public hearing on the Proposed Update on February 8, 2024, and, following extensive public testimony, recommended adoption of the Plans with modifications. Since that time, the Department of City Planning has continued to engage with stakeholders, including BCIF/BTC III, and has transmitted to this Committee a series of supplemental materials, most recently the Director of Planning Technical Memo to PLUM (Aug. 20, 2025) and accompanying Revised Actions, which identify targeted corrections and optional Council modifications. These refinements include several material adjustments responsive to the concerns voiced by industrial stakeholders at the CPC hearing. We appreciate the extensive work reflected in those materials by Planning staff.

BCIF/BTC III’s principal interest is in preserving the ability of longstanding logistics and warehousing uses to reinvest, modernize, and operate effectively near the Port while meeting contemporary design and community-compatibility objectives. In that regard, we wish to acknowledge several meaningful improvements Planning has advanced since CPC—each of which responds to feasibility concerns raised by the industrial stakeholder community and is documented in the Council File record:

- **I4 “Other Allowed Use” Requirement Reduced.** The Department’s August 20, 2025 revisions lower the ancillary “other allowed use” requirement in the Light Industrial, Park (I4) Use District from the prior 0.25 FAR (as adopted at CPC) to 0.05 FAR, applicable when **Wholesale Trade & Warehousing** is the primary use. The Article 5 use framework for I4 reflects this change and assigns the relief pathway to “Relief C2,” with supplemental procedures identified at Section 5B.8.4.D.5. (Article 5, Sec. 5B.8.4 [I4], “Other allowed use 0.25→0.05 FAR; Relief C2; see Sec. 5B.8.4.D.5.”) This calibration, memorialized in the PLUM packet, brings the standard into line with the operational realities of warehousing while maintaining an administratively manageable relief mechanism.
- **Transparency Standards Moderated.** Ground-floor transparency minimums that previously mirrored retail storefront requirements are reduced to values suitable for industrial and non-retail buildings. The PLUM packet revises Article 3 tables for frontage districts including MU4 and SH4, reducing **Ground Story transparency** to as low as 35 percent where 50–70 percent had been proposed earlier. For example, the MU4 table now shows “50% → 35%” in the transparency row, while the SH4 table similarly adjusts transparency percentages and related façade standards. (Article 3, Sec. 3B.2.4 [MU4]; Sec. 3B.4.4 [SH4].) These revisions avoid imposing retail-style glazing requirements on warehouses and reconcile design standards with security, energy, and operational needs.

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- **Building Depth and Active Depth Clarified.** Maximum building-depth requirements and related “active depth” standards in the Form and Frontage framework have been moderated to avoid overly deep single-bar buildings while preserving flexibility for industrial and flex layouts. The G-series (G3) and SH-series (SH4) frontage tables have been updated, and a new Active Depth standard codified at Section 3C.1.5 provides a clear measurement rule together with an “Adjustment” allowing up to a 20 percent reduction. (Article 3, Sec. 3B.3.3 [G3]; Sec. 3B.4.4 [SH4]; Sec. 3C.1.5 [Active Depth].) These clarifications reduce the need for case-by-case discretionary relief where industrial programming necessitates shallower or segmented building forms.
- **LB3 Lot Amenity Standard Reduced.** In the LB3 Form District, the required lot amenity set-aside has been reduced from 20 percent of lot area (as in the CPC version) to 10 percent. The PLUM packet’s Article 2 table shows the “Lot amenity space (min)” row revised to 10 percent. (Article 2, Sec. 2B.10.3 [LB3], amenity row—10% replacing CPC’s 20%.) This change materially improves site efficiency for large industrial parcels while maintaining a baseline of open-space and landscape features.
- **Landscaping Obligations Reduced.** Finally, the PLUM packet reduces planting-area minimums embedded in the frontage standards. For example, the SH4 frontage table shows the “Frontage planting area (min)” requirement reset to 12 percent, down from higher percentages carried over in the CPC draft (the same page depicts prior 20 percent values struck through). (Article 3, Sec. 3B.4.4 [SH4], “Frontage planting area (min)” row at 12%.) Similar adjustments are carried across frontage tables applied to industrial corridors, aligning landscaping obligations with logistics frontages while preserving the intended pedestrian-realm improvements.

BCIF/BTC III commends Planning staff for advancing these calibrations, which we understand would only apply to *new* industrial development within the Plan Areas and therefore would not render existing industrial facilities, such as those owned and operated by BCIF/BTC III, as legal nonconforming. The calibrations collectively reflect careful listening and a good-faith effort to balance the City’s design objectives with the functional requirements of port-serving industry.

There is, however, an implementation clarification that remains essential to memorialize now—both for predictability and to avoid unnecessary implementation issues that may arise later down the road. As noted above, the I4 District now pairs Wholesale Trade & Warehousing with an “Other allowed use” minimum of 0.05 FAR, with relief labeled “C2” and supplemental procedures cross-referenced to Sec. 5B.8.4.D.5. Based on our office’s ongoing discussions with City Planning

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staff, our understanding is that accessory office space that is customary and incidental to warehousing/logistics operations qualifies as, and does/shall satisfy, the “other allowed use” component when it meets the 0.05 FAR threshold.

We appreciate staff’s confirmation of this interpretation in conversation; however, because Chapter 1A is lengthy, complex and will be implemented at the counter by many hands over time, we respectfully request an express sentence be added to Sec. 5B.8.4 stating that accessory office associated with a warehouse/logistics use may count toward the “other allowed use” requirement. This small text addition would mirror staff’s stated approach, promote consistent plan-check decisions, and obviate case-specific filings merely to confirm the underlying intent of the policy.

We also want to briefly address the new Hybrid Industrial concept introduced in the Harbor LA Plans. BCIF/BTC III’s parcels are not within a proposed Hybrid designation, and we understand the City’s rationale of using Hybrid to manage edges and transitions. Even so, as a participant in the Plan Area’s logistics economy, BCIF/BTC III wishes to make an important caveat: Hybrid can, in practice, pull sensitive or publicly accessible uses into traditionally industrial corridors, increasing the likelihood of land-use friction right where regional goods-movement’s efficiencies are greatest. In intent, Hybrid is framed as a buffer; in application, it risks functioning as the reverse of the buffering direction that state policy has emphasized—placing sensitive receptors nearer to freight activity rather than reinforcing separation of these fundamentally incompatible uses. Given the recent adoption of Assembly Bill 98 and other recent state legislation, which effectively stand for the reverse approach of ensuring that new industrial uses are not sited in close proximity to existing residential or other sensitive uses, the Hybrid designation should be deployed sparingly or not at all in the Harbor, with performance standards and siting criteria that protect port-adjacent industrial functionality and avoid the inevitable conflicts between the introduction of new “live work” and similar uses with pre-existing legacy industrial operations.

BCIF/BTC III supports Council adoption of the targeted corrections summarized above. We also respectfully request that your action include direction to incorporate an explicit clause in Sec. 5B.8.4 confirming that accessory office associated with warehouse/logistics may satisfy the “other allowed use” minimum. That direction would simply codify staff’s stated implementation intent and provide durable guidance to City staff who will be tasked with implementing this for years to come. (Article 5, Sec. 5B.8.4 [I4]—table and procedures cited in the PLUM packet.)

We acknowledge and appreciate the substantial effort by City Planning staff to refine the Harbor LA Plans between CPC and the PLUM transmittal. These adjustments, listed above, together reflect a thoughtful balancing effort responsive to stakeholder input. We ask that the

Allen Matkins Leck Gamble Mallory & Natsis LLP
Attorneys at Law

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Committee adopt these improvements and add the narrow clarification requested above so the ordinance text is unambiguous at implementation.

We remain available to confer with the Committee and staff at any time, and would welcome the opportunity to assist in finalizing clarifying language requested above or any other provisions necessary to ensure that the intent of the Proposed Update is faithfully implemented.

Very truly yours,



Paige H. Gosney

cc: BCIF/BTC III (via e-mail only)

Communication from Public

Name: Cynthia Babich

Date Submitted: 08/25/2025 02:26 PM

Council File No: 25-0775

Comments for Public Posting: Dear PLUM Committee, The Del Amo Action Committee has been engaged with City planners throughout this community planning process: 2017 to this very day. We are proud this plan supports Environmental Justice as a guiding principle and begins the important process of moving heavy industries away from City and County residential areas. The health impacts we receive from Chemical facilities, Superfund Sites, Trucking facilities on our roads lacking the proper infrastructure to hold together under the pressure of off port trucks and the increase in warehouses is literally choking us to death. Working with planners on the City and County side has been rewarding and we have come so far to understand the impacts and the solutions. Although the solutions in landuse modifications called out in the Harbor Gateway Plan can not come soon enough they are a beginning. It is critical to improving the well-being of our environmental justice communities that we do not weaken any progressive standards being set with this revised plan. We are in strong support of moving to planing decisions that include measures to reduce the harm from land use plans that collide with adjacent planning areas; like our West Carson Community. The Harbor Gateway Plan does just that. Our comments to the final plan from the Spring 2022 still stand today. Our attachment includes our comments on the Environmental Impact Report. We appreciate the opportunity to be engaged with such important land use decisions. November 2021 City Planning Team, Thank you for the opportunity to comment on the draft community plan for the Harbor Gateway area. This plan encompasses and borders the communities that the Del Amo Action Committee has been engaged with for decades. This plan is a critical step towards the transformation needed to protect the most vulnerable communities living in the plan area. Environmental injustices are real and have had health derailing consequences on many generations living in our communities; low income communities of color are in need of critical protections long overdue them. We appreciate your openness throughout this multi-year process and engagement with us and our community members from the very beginning. This has helped us to build a good foundation for the important relationships that must be forged with those living in the planning area as we work on its implementation. You have been in our

communities and have witnessed first-hand our daily life. The smells, the noise, the traffic, the hustle and bustle of living with incompatible mixed uses and neighboring jurisdictions where landuse plans seem to collide with each other. You also have listened to our dreams of a healthy place to raise our families, build community and recreate in our own spaces; a sense of community which you speak to in your plan. This process is a model for engagement for other agencies, boards and government offices; they should take note. Community engagement has enhanced your efforts and engaging with the planning team has enriched our understanding of the importance of having a plan to not only guide our future decision making but to fully understand the condition of the areas in need of much repair and course correction. We offer our comments to strengthen this plan and to support BOLD actions that must be taken to truly protect the health of residents overburden by pollution for so very long. We wish to support the hard decisions that must be made to bring this planning area into balance. We understand the need to maintain areas that create needed revenue. We seek to continue to work with you as the plan is implemented in a spirit of partnership and collaboration. We believe that more hard decisions need to be made in this draft plan. Some of the designated zoning areas just do not go together; like Industrial legacy contaminated properties and adjacent neighborhoods. "By-Right" is a giant loop hole that needs to be closed. It leads us down the same path that has been detrimental to our health and as shown by the alarming score for this area from CalEnvrioScreen (a tool used to compare the pollution burden of communities across California) of 96%-100%, meaning that the communities in this planning area are MORE saturated with pollution when compared across the State. Green spaces, pocket parks and recreational areas need to become the buffer zones for our vulnerable neighborhoods not more of the same "By-Right" pollution impacts with a new hybrid name attached to it. We must partner to ensure these areas are remediated to their fullest. Full remediation leaves more options on the table for future uses and benefit to those that live, work and play in the Harbor Gateway. We will be sending additional comments this week that correspond to the specific chapters of the plan. Sincerely, Cynthia Babich Director, Del Amo Action Committee Coordinator, Los Angeles Environmental Justice Network



September 16, 2019

Marie Cobian
Community Planning
Los Angeles Department of City Planning
200 North Spring Street, Room 667
Los Angeles CA 90012

Staff

Cynthia Babich
Director

Board of Directors

Florence Gharibian
Board Chair

Cynthia Medina
Assistant to the
Director/Resident

Jan Kalani
Homeowner/Resident

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Lizabeth Blanco
Homeowner/Resident

Lydia Valdez
Homeowner/Resident

In Memoriam
Nick Blanco
Homeowner/Resident

Barbara Stockwell
Homeowner

Regarding: Comments on the scope of the Environmental Impact Report for the South Harbor Community Plans.

Thank you for another opportunity to comment on the City Plan Update for the Harbor Gateway area. We understand that the intent for the solicitation of comments is to ensure the upcoming EIR will analyze potential impacts resulting from the proposed land use changes and is not meant to address existing conditions. We further understand the value you place on the observations of those living near the most toxic sites in the planning area and we appreciate that.

There are several Class 1a and 1b (World Health Organization) toxic sites in the Harbor Gateway planning area
(https://www.who.int/ipcs/publications/pesticides_hazard_2009.pdf) page 8
pasted below.

Revised criteria for classification (introduced for 2009 update)

The table showing the Recommended Criteria for Classification from the original World Health Assembly Proposal is not shown because it is no longer used. WHO now uses the Acute Toxicity Hazard Categories from the GHS⁶ as the starting point for classification. This change is consistent with the 1975 World Health Assembly Resolution which envisaged that the WHO Classification would be further developed with time in consultation with countries, international agencies and regional bodies. The GHS meets this requirement as a classification system with global acceptance following extensive international consultation.

WHO Class		LD ₅₀ for the rat (mg/kg body weight)	
		Oral	Dermal
Ia	Extremely hazardous	< 5	< 50
Ib	Highly hazardous	5–50	50–200
II	Moderately hazardous	50–2000	200–2000
III	Slightly hazardous	Over 2000	Over 2000
U	Unlikely to present acute hazard	5000 or higher	

The Montrose, Del Amo and Jones Chemical Superfund Sites are rated as Ia or Ib classification sites. Bridge Warehouse on the former Farmer Brothers site would classify as a Class II site based on soil contamination left in place and the highly toxic groundwater plume under all four of these sites and the nearby adjacent communities.

We are recommending that Class Ia & b and II sites have a setback of 1500 feet from any and all housing and sensitive receptor sites, like youth or senior facilities. We have based this recommendation on our knowledge of how Federal Superfund sites are being redeveloped and the expectation that the Federal EPA has a firm grip on remediation and redevelopment. The 9 criteria EPA uses for focused Superfund site investigations bases its remediation and reuse on existing landuse designations. So while the City planners look to the EPA for landuse appropriateness the EPA is looking at local planning, effectively eliminating proper site management and long term community health protections.

Table ES-1: Review of Key Public Health and Safety Hazards and Setback Distance Guidance is pasted below and can be found in the Public Health and Safety Risks of Oil and Gas Facilities in Los Angeles County by the Los Angeles County Department of Public Health document on page iii and page 22.

(https://www.thinkhealthla.org/content/sites/losangeles/CHIP_Workgroup_Mtg_1017/FINAL_DPH_Report_Public_Health_and_Safety_Risks_of_Oil_and_Gas_Facilities_in_LAC_02282018_corrections.pdf)

Los Angeles County Department of Public Health
http://publichealth.lacounty.gov



Table ES-1. Review of Key Public Health and Safety Hazards and Setback Distance Guidance

Setback Distance	Air Quality	Noise	Odors	Fires, Explosions, and Other Emergencies	Additional Mitigation and Assessment Notes
300 feet					Some health and safety impacts may still be unavoidable regardless of additional mitigation.
600 feet	✓				Additional mitigation and assessment would likely be needed to avoid most impacts. Odors may be unavoidable, regardless of mitigation. Air monitoring is advised.
1,000 feet	✓	✓			Additional mitigation and assessment may be needed to avoid noise impacts during certain operations, e.g. well advancement. Odors may be unavoidable in loss of containment events, regardless of additional mitigation.
1,500 feet	✓	✓	✓		Additional mitigation not likely to be needed. Some uncertainty remains due to gaps in long-term health and exposure data.

This table is based on information compiled from scientific publications,^{13,37,51,52} environmental impact assessments,²⁷⁻³³ other environmental studies,^{10,16,20,34,35,36,46} and experiences in other jurisdictions.

✓ Represents the distance at which the impact is likely mitigated

We are encouraged by the collaborative efforts between the Los Angeles County Department of Public Health and the City Planning Departments and further believe the Los Angeles County Department of Public Health has a much larger role to play in landuse planning and community health protection. In addition to the documents we have referred to, we would encourage you to review and incorporate where appropriate the Community Health Improvements Plan 2015-2020 (http://publichealth.lacounty.gov/plan/docs/CHIPforLACounty20152020_03.2016_revised_logo_121616.pdf). Our comments on this document are attached for your review.

We are concerned with mixed uses in and around the impacted neighborhoods in the planning areas. As we learn more about sensitive populations and air pollution exacerbations we see that often mixed landuses are like oil and water, incompatible unless well defined. We hope that discretionary choices between jobs and community health error on the side of health protection.

The by-right process used by the City must be eliminated; this streamlined process has increased the areas air pollution and harms the adjacent growing neighborhoods.

We want the City to aide in the identification of sites where open space can be incorporated into our neighborhoods and to make this effort a priority. This is the time to incorporate changes to the plan based on hindsight and community health equity as a measure of healthy neighborhoods.

We want to reiterate and support the comments submitted by Margaret Manning a highly engaged member of the community.

Again we appreciate the opportunity to provide comments early and often in this process.

Cynthia Babich
Director, Del Amo Action Committee



November 23, 2021

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Staff

Cynthia Babich
Director

Comments on: Los Angeles City Planning Harbor Gateway Community Plan –
July 2021 Draft

Board of Directors

Florence Gharibian
Board Chair

Teresa and City Planning Team,

Cynthia Medina
Board Member
Homeowner/Resident

Thank you for the opportunity to comment on the draft community plan for the Harbor Gateway area. This plan encompasses and borders the communities that the Del Amo Action Committee has been engaged with for decades. This plan is a critical step towards the transformation needed to protect the most vulnerable communities living in the plan area. Environmental injustices are real and have had health derailing consequences on many generations living in our communities; low income communities of color are in need of critical protections long overdue them.

Jan Kalani
Board Member
Homeowner/Resident

Bruce Bansen
Board Member
Homeowner/Resident

We appreciate your openness throughout this multi-year process and engagement with us and our community members from the very beginning. This has helped us to build a good foundation for the important relationships that must be forged with those living in the planning area as we work on its implementation. You have been in our communities and have witnessed first-hand our daily life. The smells, the noise, the traffic, the hustle and bustle of living with incompatible mixed uses and neighboring jurisdictions where landuse plans seem to collide with each other. You also have listened to our dreams of a healthy place to raise our families, build community and recreate in our own spaces; a sense of community which you speak to in your plan. This process is a model for engagement for other agencies, boards and government offices; they should take note. Community engagement has enhanced your efforts and engaging with the planning team has enriched our understanding of the importance of having a plan to not only guide our future decision making but to fully understand the condition of the areas in need of much repair and course correction.

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Brenda Bibee
Board Member

We offer our comments to strengthen this plan and to support BOLD actions that must be taken to truly protect the health of residents overburden by pollution for so very long. We wish to support the hard decisions that must be made to bring this planning area into balance. We understand the need to maintain areas that create needed revenue. We seek to continue to work with you as the plan is implemented in a spirit of partnership and collaboration.

We believe that more hard decisions need to be made in this draft plan. Some of the designated zoning areas just do not go together; like Industrial legacy contaminated properties and adjacent neighborhoods. “By-Right” is a giant loop hole that needs to be closed. It leads us down the same path that has been detrimental to our health and as shown by the alarming score for this area from CalEnvrioScreen (a tool used to compare the pollution burden of communities across California) of 96% -100%, meaning that the communities in this planning area are MORE saturated with pollution when compared across the State. Green spaces, pocket parks and recreational areas need to become the buffer zones for our vulnerable neighborhoods not more of the same “By-Right” pollution impacts with a new hybrid name attached to it. We must partner to ensure these areas are remediated to their fullest. Full remediation leaves more options on the table for future uses and benefit to those that live, work and play in the Harbor Gateway.

Our specific comments are presented by the sections they are referring to.

Readers Guide

Need to include; community participation and acceptance of plan implementation in areas that directly impact the health and well-being of residents in neighborhoods the plan covers.

This section does a good job of presenting the balance that this plan is trying to achieve. It touches on many concepts that are missing from previous plans; like Environmental Justice and the need to transition out properties that are incompatible and adjacent to these vulnerable communities. This plan needs to be **Bolder**, and make some hard changes about mixed uses. Some zoning is just not a good fit and will never be mitigated enough to be a healthy option for adjacent or planned multi family life.

We appreciate the section on effective implementation, without this the document is just more promises of a better future written with ink and paper.

Historic Development Patterns

The Del Amo Action Committee wishes to thank you for recognizing our existence in this historical timeline!

Guiding Principles

Many stated long-term priorities will improve areas of our community. We would especially like to uplift the importance of the following bullets in the plan:

- Address the legacy of contamination and advance environmental justice goals
- Support a clean Dominguez Channel, improved air and water quality and remediation of superfund and brownfield sites
- Reduce negative health impacts by restricting new uses that are detrimental to the health and welfare of the community
- Encourage residential infill that contributes to the mixed-income and affordable housing supply
- Promote strategies to increase home ownership opportunities
- Improve land use compatibility by creating buffers and transitions between heavy/intense uses and residential neighborhoods
- Reduce the footprint of the oil and gas industry within neighborhoods by prioritizing the plugging and abandoning of oil wells in residential areas and repurposing sites for community uses
- Promote a diversity of uses that support healthy living and community needs
- Support the development of public realm and streetscape improvements including improvements that will have a cooling effect

- Support an increase in employment opportunities within the community
- Encourage innovative and green industries that provide a greater number of jobs for local youth and residents
- Develop partnerships between local unions, employers, chambers of commerce, workforce development programs, and job recruiters to create career pathways for local youth
- Encourage improvements to existing businesses to upgrade the visual quality of industrial areas
- Ensure that goods movement respects residential neighborhoods and follows appropriate routes (*Denker Ave. is a prime example of this need*)
- Improve access to, and connectivity between, parks, recreation centers, open spaces, neighborhoods, and waterways such as the Dominguez Channel
- Encourage the creation of public spaces for people to gather and interact
- Connect neighborhood to amenities like the Dominguez Channel and adjacent bike path

General Plan Land Use Designations (in process)

Villages: Use extreme caution with mixed use living; especially with growing families that require open space (yards) to promote a healthy lifestyle.

Hybrid Industrial: These areas include two of the most toxic sites in the country containing “legacy wastes”. Important steps must evolve over time like complete cleanups. These areas need forethought and upfront planning. If a site is zoned “Industrial” that is the level of cleanup it will receive under CERCLA; cleanup is based on anticipated future landuse. Need to advocate and plan for future landuse that will achieve the highest cleanup to maximize future uses. If not appropriately remediated a “live-work” scenario will not be health protective and this option should be removed from this description.

Industrial: These areas should be designated and located as far from residential areas as possible including relocating them if needed. Just adding” Light or Hybrid” in front of Industrial does not meet the stated objectives of this plan.

Open Space: Should add a sentence about this designation being an excellent transitional space and residential buffer zone. All industrial designations should have an open green space buffer, especially locations like the “Hybrid Industrial” strip of land along the Del Amo Alley adjacent to the beginning of the residential area of West Carson.

LAND USE AND URBAN FORM

“The Plan Area’s unique geography that shares borders with other jurisdictions present its own challenges for oversight and management.”

This is what we have referred to as when “Landuse Plans Collide.” It is imperative to create a collaborative process to formally consider the landuses in other boarding communities to insure zoning is protective and consistent across borders. Time needs to be taken to rezone areas that are and will not ever be compatible. An example is the area between Normandie and Budlong along the Del Amo Alley that borders the Los Angeles County West Carson “Environmental Justice” community. The County is zoned residential and the portion of this Area Plan, across the alley (50 feet or less away), is proposed to be zoned as “Hybrid Industrial.” This particular area where land use plans collide needs to be rezoned into open green connective spaces as further describe in this community plan area. This calls for **bold** decision making, cannot leave zoning the way it is and claim to protect public health or meet your environmental justice goal.

We fully support and would love to partner with you on Dominguez Channel revitalization and using this area as a conduit for connecting open spaces.

GOAL LU 1

SAFE, HEALTHY AND HIGH-QUALITY RESIDENTIAL ENVIRONMENTS THAT PROVIDE HOUSING FOR ALL SEGMENTS OF THE COMMUNITY.

No new homes should be placed adjacent to freeways or (4) lane or more transportation corridors.

LU 1.2

Is housing compatible in these corridors?

LU 1.7 and 1.8

“Encourage new multi-family developments...”

You need to plan for larger scale residential communities with co-located amenities like parks, etc., not hope for them to be placed properly here and there. Having the wrong mixed uses continues to create areas adjacent to each other that are incompatible.

LU 1.9

“Develop senior housing in neighborhoods that are accessible to public transit,”

Please do not locate our grandparents next to freeways or “Hybrid Industrial” zones.

LU 1.12 and 1.13

One solution could be to set up RV Parks with hook ups for sanitation, water and electricity. These step-up RV parks should be subsidized by Government homelessness funds to get these families off the streets and protect public health. We highly support the statement of including community input; especially for solutions we already know what the problem looks like. Shifting the burden from one area to another is not a solution.

GOAL LU 2

NEW HOUSING THAT IS LOCATED IN A MANNER WHICH REDUCES VEHICULAR TRIPS AND MAKES IT ACCESSIBLE TO SERVICES AND FACILITIES.

No homes should be built next to freeways, especially for large families and high density. Mixed use is very unpredictable and we suggest should not be encouraged. Instead stick with your safe streets and walkable street concepts, these lead to healthy happy well balanced neighborhoods.

GOAL LU 3

RESIDENTIAL NEIGHBORHOODS THAT ARE PROTECTED FROM INCOMPATIBLE AND NON-CONFORMING USES.

LU 3.1

This is a most important objective to reaching this goal and protecting vulnerable communities.

LU 3.2

Oil and people Do Not Mix.

LU 3.3

Superfund sites are remediated based on a few factors; a huge one is future land use. If you do not establish concrete steps for returning these sites to productive uses they will be left “By-Right” the toxic nightmares they have become. These areas should be rezoned to capture the area plan elements that call out for green open space transitional zones. If strategic actions are not identified and put into place that maximize the clean-up, the responsible parties will need to pay for, this area will endure these toxic burdens for many decades yet to come.

LU 3.4

Highly support this objective and offer to share our decades of experience working on the remediation of these area Superfund sites leading to a healthier place to live, work and play.

GOAL LU 4

NEW DEVELOPMENT THAT MINIMIZES THE DISPLACEMENT OF CURRENT RESIDENTS.

These goals will help curb gentrification in the area plan; we would suggest using the strongest language possible to ensure this goal is met; use mandate instead of encourage.

CULTURAL AND HISTORIC RESOURCES

This goal can help ensure compatibility and hopefully height restrictions on commercial properties adjacent to residential areas. An example is from 2018 when a one story small warehouse and trucking company (Farmers Bros Coffee) in this planning area was replaced “By-Right” with a huge 512,000 square foot monolith warehouse built by Bridgepoint Development. Residents of this area will be health impacted and burdened by this incompatible landuse for decades to come.

GOAL LU 5

HARBOR GATEWAY’S CULTURAL HERITAGE ENDURES THROUGH CONSERVATION OF HISTORIC RESOURCES AND PLANNING DISTRICTS THAT PRESERVE THE CULTURAL CHARACTER OF THE COMMUNITY.

LU 5.6 and LU 6.8

Buffer (transition) zones are critical in protecting public the health of adjacent residents.

CENTERS, VILLAGES AND CORRIDORS

Need to be clear about “corridors”; traffic and truck corridors would provide a better transparent description of what you are referring to.

Multi-family units do not seem like a good mixed use fit at all. The families in this planning area utilize their yards as open space and prepare home cooked meals. This plan is trying to mix too much together. Perhaps dwellings for singles could fit but not multi-family units. Choices must be made in order to not repeat past landuse planning harms.

GOAL LU 7

STRONG AND COMPETITIVE COMMERCIAL DISTRICTS THAT BEST SERVE THE NEEDS OF THE COMMUNITY.

LU 7.4

How would this work? Need more than encouragement, need mandates.

LU 7.6

There is already too much truck traffic along these commercial corridors. Road infrastructure is old in many places and need major upgrades; which should come before any ideas of expansion.

LU 7.8

Dominguez Channel area should be preserved for open space and recreation; no commercial development.

GOAL LU8

AN ADEQUATE LEVEL OF COMMERCIAL AREAS THAT PROVIDE EQUITABLE ACCESS TO HOUSING, OPEN SPACE, GOODS AND SERVICES.

LU 8.1

Can’t have it all, there is only so much space available in the planning area. Choose between vibrant commercial areas to sustain businesses or healthy residential developments.

LU 8.2

Again raising previously stated mixed use concerns.

GOAL LU 9

MEDIUM AND HIGHER DENSITY MIXED USE DEVELOPMENT THAT IS LOCATED APPROPRIATELY WITHIN THE COMMUNITY.

Use caution, this planning area has too many toxic land areas not yet remediated.

GOAL LU 10

COMMERCIAL AREAS WITH CONVENIENT ACCESS VIA ALL MODES OF TRAVEL AND PARKING SOLUTIONS THAT MEET BUSINESS, CUSTOMER AND RESIDENT NEEDS.

LU 10.1, 10.2, 10.3 and 10.4

The objectives listed to meet this goal are good and solid.

Regional Center

GOAL LU 11

A REGIONAL CENTER VITAL TO THE ECONOMY OF THE REGION AND THAT SERVES AS THE HEART OF HARBOR GATEWAY COMMUNITY PLAN AREA.

LU 11.3

“Consider commercial and hybrid industrial zones in the Regional Center to support a variety of uses, including.....regional-serving uses for community stakeholders.”

What type of uses?

LU 11.7

Need to balance high rise and open spaces.

JOBS AND ECONOMIC DEVELOPMENT

Must be cautious about pollution burden increases to neighborhoods especially ones not in your (City) planning area.

Existing industrial land must be remediation to its fullest end landuse potential.

“Post-war factories” many of which are now Superfund or Brownfields sites. The Del Amo Superfund site stretched from Del Amo to 190th and Normandie to Vermont/Hamilton; no housing should be allowed in this area because of questionable clean up levels; not residential cleanups.

GOAL LU 12

A COMPLETE NEIGHBORHOOD THAT PROVIDES COMMERCIAL SERVICES AND EMPLOYMENT NEEDS FOR ALL RESIDENTS.

LU 12.3

“Maintain and increase the commercial employment base for community residents,...through local hiring, ...”

How can this be ensured?

Are there ways to measure the success of this objective?

Industrial Areas

Industrial areas and neighborhoods Do Not Mix – Must transition OUT of some of the Industrial areas not just add “Hybrid” in front of term. These areas must not be embedded in communities; like the Montrose and Jones Chemical sites adjacent to residential neighborhoods. The toxic contamination from these sites is killing residents in the areas.

Jones Chemical must be removed! It has a dangerous potential for a chlorine release or tanker catastrophe. This facility stores 1.8 million pounds of Chlorine on site; brought by train through this planning area. Up to 12 tanker cars of chlorine arrive at the Jones Chemical site per week. This is the link to the Jones Chemical, Torrance Risk Management Plan. <https://rtk.rjifuture.org/rmp/facility/100000141394#toxicswc>

The section below has been copied from [The National Institute for Occupational Safety and Health \(NIOSH\)](https://www.cdc.gov/niosh/ershdb/emergencyresponsecard_29750024.html) - Chlorine: Lung Damaging Agent and is located at the following link: https://www.cdc.gov/niosh/ershdb/emergencyresponsecard_29750024.html

• **INITIAL ISOLATION AND PROTECTIVE ACTION DISTANCES:**

- If a tank, rail car, or tank truck is involved in a fire, isolate it for 0.5 mi (800 m) in all directions; also consider initial evacuation for 0.5 mi (800 m) in all directions.
- Small spills (involving the release of approximately 52.83 gallons (200 liters) or less)
- First isolate in all directions: 100 ft (30 m).
- Then protect persons downwind during the day: 0.2 mi (0.2 km).
- Then protect persons downwind during the night: 0.8 mi (1.2 km).
- Large spills (involving quantities greater than 52.83 gallons (200 liters))
- First isolate in all directions: 800 ft (240 m).
- Then protect persons downwind during the day: 1.5 mi (2.4 km).
- Then protect persons downwind during the night: 4.6 mi (7.4 km).

“Plan policies will support the preservation of established industrial districts to promote an equitable job/housing balance and help ensure appropriately located land accommodates existing new and relocating industrial firms, including small-scale or niche manufacturing and emerging industries.”

Do not put profits before the safety of established neighborhoods; industrial and residential zones do not mix - one must go.

“Light industrial and hybrid industrial areas will typically serve as improved transition zones between heavy industrial land and residential or commercial areas.”

This is a very bad policy!

Open space green zones should be the transition spaces between industrial and residential.

“Strategically designated hybrid industrial areas are intended to include limited live-work uses...”

No living of any kind in industrially zoned areas.

GOAL LU 13

LAND IS DESIGNATED FOR A VARIETY OF INDUSTRIAL USES WITH MAXIMUM EMPLOYMENT OPPORTUNITIES.

LU 13.1 and 13.2

This planning area is already overburdened by pollution. NO TO INDUSTRIAL EXPANSION, especially in plan areas adjacent to West Carson County Strip. Many current Industrial areas should be transitioned to commercial; this should be a solid plan moving forward and stated clearly so businesses have ample opportunity to have relocation in their planning processes.

LU 13.6

Change must be mandated not requested. This plan should be confident in leading the change needed to start to repair of contaminated neighborhoods into healthy ones.

GOAL LU 14

LIGHT AND HYBRID INDUSTRIAL DISTRICTS THAT FEATURE DEVELOPMENT AND BUSINESSES OF ALL SIZES ENGAGED IN GREEN, EMERGING INDUSTRIES THAT PROVIDE SERVICES AND EMPLOYMENT OPPORTUNITIES.

LU 14.1

These areas should be transitioned to open and public facilities spaces.

LU 14.3

“Live/work or residential uses” in these areas are absolutely life threatening. Many of these areas are toxic from decades old legacy wastes and are not remediated enough or if at all for people to live there or any living thing for that matter.

GOAL LU 15

EXISTING AND FUTURE INDUSTRIAL DEVELOPMENT AND EMPLOYMENT ARE LOCATED CONVENIENT TO TRANSPORTATION FACILITIES AND SUPPORTIVE OF THE SURROUNDING LAND USES.

LU 15.1, 15.2 and 15.3

How will this be done?

Denker Ave. between Torrance Blvd. and Del Amo is a complete disaster. There are industrial warehouses on one side and single family homes on the other. Trucks are triple parking as the wait in queue to get into warehouses, THIS MUST BE FIXED!

URBAN FORM

Residential Areas

GOAL LU 16

RESIDENTIAL NEIGHBORHOODS WITH VARIED AND DISTINCT CHARACTER AND INTEGRITY.

LU 16.6

“Provide a buffer or separation...”

Buffer zone separations will be a big step in the right direction.

Commercial Areas

GOAL LU 17

ENHANCED AND ATTRACTIVE REGIONAL CENTER AND COMMERCIAL CORRIDORS THROUGH PUBLIC IMPROVEMENTS AND PRIVATE DEVELOPMENT PROJECTS THAT REFLECT THE COMMUNITY IDENTITY OF HARBOR GATEWAY.

LU 17.3

Need to use caution with mixed uses.

LU 17.4

“Encourage new infill multi-family residential development that is consistent with existing neighborhood character.”

Discourage multi-family infill, to have health families they need yards and open spaces; not commercial corridors with the traffic congestion that comes with them.

GOAL LU 18

COMMERCIAL DEVELOPMENTS WITH ENHANCED AESTHETIC QUALITY AND PEDESTRIAN ORIENTATION

LU 18.13

Great! At so many of the bus stops, especially all along Normandie Ave. next to the West Carson area, there are no benches or shelters and most stops lack handicap access.

GOAL LU 19

STRONG COMMERCIAL DISTRICTS WITH IMPROVED DESIGNS THAT ARE COMPATIBLE WITH SURROUNDING LAND USES.

LU 19.1

“Ensure that projects are designed and developed to achieve a high level of quality, distinctive character, and **compatibility with existing uses and development.**”

It is imperative that you consider adjacent planning areas like West Carson in the County Strip.

Industrial Areas

GOAL LU 20

INDUSTRIAL AREAS WITH SUSTAINABLE INDUSTRIAL DEVELOPMENT, IMPROVED DESIGN AND AESTHETIC QUALITY.

LU 20.2

Industrial and residential land uses are NOT COMPATIBLE!

LU 20.4

“Encourage upgrades to parcels in industrial areas to include features that help capture, infiltrate and treat contaminated runoff through the application of Best Management Practices for stormwater treatment.”

Best Management Practices should be mandated.

Public Realm and Open Space

GOAL LU 21

A HEALTHY COMMUNITY WITH ACCESS TO A DIVERSITY OF PUBLIC AND OPEN SPACES THAT INCLUDE GREEN OPEN SPACES, RECREATIONAL AND PARK FACILITIES FOR THE COMMUNITY TO GATHER, SOCIALIZE, AND CELEBRATE.

Lu 21.1 and 21.2

This is a critical piece of the plan, need to plan for open space and green zones; mandate their locations. Just encouraging will not achieve the goals of this plan.

ENVIRONMENTAL JUSTICE

“The EPA has created a Community Involvement Plan (CIP) to address community involvement and outreach at both sites.” (Del Amo and Montrose Superfund sites)

The EPA CIP is a failed plan - please do not use it; they do not even communicate on a regular basis with engaged community members. You could create your own plan and we would be happy to help. The Del Amo Action Committee has been requesting that the EPA support the formation of a “Community Advisory Group” to bring some equity to their decision making.

Here is the link to our comments on EPA CIP dated February 14, 2019:

<https://documentcloud.adobe.com/link/track?uri=urn:aaid:scds:US:1b4e81c0-589d-4790-bc1c-eff975b0a6e1>

“The Community Plan envisions a safer and cleaner environment for the Harbor Gateway community where industrial uses and residential neighborhoods are improved and mutually **co-exist**. While many of the existing industrial businesses may have environmental challenges, they also contribute to the local economy and jobs base. The Community Plan reinforces ongoing efforts to address past land use planning that enabled heavy/polluting industrial uses to operate in close proximity to residential areas through sensitive zoning, the creation of buffer zones, transitions of heavier industrial land uses and more robust industrial development standards. The intent is to enable industrial businesses to continue to thrive, but also operate in a way that minimizes adverse impacts to the community and the environment. In addition, the Plan seeks to transition underutilized heavy industrial land to hybrid industrial and commercial land use designations to encourage clean-tech job creation and to expand the commercial and residential development opportunities in the Plan area. The Community Plan also seeks to protect communities from noxious uses, encourage cleaner industrial uses, support community revitalization and beautification, promote access to public and recreational facilities, and improve the overall quality of life. Additionally, the Community Plan fosters a community where equitable public and community investments and services are provided that improve the health and welfare of the local community.”

Industrial is a broad term; maybe you could distinguish between industries (some are more compatible than others).

“...co-exist.”

Jones Chemical (Chlorine Gas), Montrose (DDT) and Del Amo (Benzene), these are poisons that can kill nearby residents and cause cancer.

We recommend that an EJ commission be formed to insure implementation of this plan, especially the sections that have environmental justice as an overarching protection.

Box on top of page 44, please add West Carson to the AB617 communities.

GOALS AND POLICIES

COMMUNITY PARTNERSHIP AND ENGAGEMENT

GOAL EJ 1

A COMMUNITY WHERE ALL PERSONS HAVE THE OPPORTUNITY TO PARTICIPATE IN THE DECISION MAKING PROCESS THAT AFFECTS THEIR ENVIRONMENT.

These are all good goals as long as they have a solid implementation plan.

We could help with this and would be happy to be engaged.

EJ 1.3

Contract with community groups for trainings or learn together programs - DO NOT CONTRACT WITH COMMUNITY BROKERS WE CAN SPEAK FOR OURSELVES!

EJ 1.4

This is really important, the agencies are not collaborating enough and this is one way to have a proactive planning process especially with the toxic State and Federal sites.

EJ 1.5

“...the Boys and Girls Club,...”

They have a questionable reputation and worried about youth located on toxic facilities. The Harbor City one took in substantial funds from Bridge Development, who built a warehouse in the planning area and is currently building one adjacent to it in the County area.

EJ 1.6

Good objective, but how will you do this?

GOAL EJ 2

CITY PROVIDED IMPROVEMENTS AND PROGRAMS ARE PRIORITIZED FOR LOW-INCOME AND ENVIRONMENTAL JUSTICE COMMUNITIES.

EJ 2.1

“....should prioritize the needs of those in environmental justice communities when developing their work plans.....”

This needs to be mandated not just encouraged.

HEALTH, WELLNESS AND SUSTAINABILITY

“By directing new housing and commercial development around transit, major corridors, and in regional center.”

Trucks and family life are not a good mix. These uses are not compatible with each other!

GOAL EJ 3

NEW DEVELOPMENT IS ENVIRONMENTALLY SUSTAINABLE AND EMBODIES SOCIAL AND EQUITABLE RESPONSIVENESS, RESOURCE EFFICIENCY AND COMMUNITY SENSITIVITY AND CONTEXT.

The listed objectives to reach this goal are all very encouraging. Implementation planning will be a very important tool for success.

EJ 3.3

Could include “Vegetative Walls” they are great to look at and help clean the air too!

EJ 3.6

Very good and needs to be planned out especially for areas around the Superfund sites where stormwater drainage is antiquated and like it was in the 1940’s.

EJ 3.9

Great, ensure walking corridors are designed to separate bicycle and pedestrians from vehicles.

CLEAN UP AND REMEDIATION

GOAL EJ 5

A COMMUNITY WHERE LAND USE PATTERNS SUPPORT HEALTHY AND THRIVING NEIGHBORHOODS WHILE PROVIDING SPACES FOR INDUSTRY AND ECONOMIC DEVELOPMENT IN APPROPRIATE LOCATIONS.

Must keep industry away from residential areas or the history of incompatibility will continue.

EJ 5.1

Need to transition away from industrial to open space with appropriate remediation by those responsible or through Brownfield programs. Create transitions to green space walking corridors.

EJ 5.2

Good, stopping the continuation of these incompatible landuses.

EJ 5.3 and 5.4

Need to really build around the implementation of these goals especially the Superfund sites.

EJ 5.5 – 5.8

These are all so important for healthy vibrant communities.

- Protect people not future profits.
- Promote the full remediation of Superfund Sites
- Relocate the industries or Relocate the people
- The critical tipping point on health has been reached – Swift corrections are in order!!!!

GOAL EJ 6

SUPERFUND, BROWNFIELDS AND CONTAMINATED INDUSTRIAL SITES ARE REMEDIATED AND TRANSFORMED INTO NEW JOB CENTERS OR OTHER PRODUCTIVE USES.

Need a solid implementation plan: Build broad partnerships.

EJ 6.2

Important to have strong community partners, Del Amo Action Committee has expertise in this area.

EJ 6.3

Another non-profit organization in the area with expertise is the Los Angeles Neighborhood Land Trust.

EJ 6.4

Create local, state and federal agency collaborations to proactively plan redevelopment. Collaboration is a key ingredient to success.

LAND USE AND URBAN FORM

GOAL EJ 7

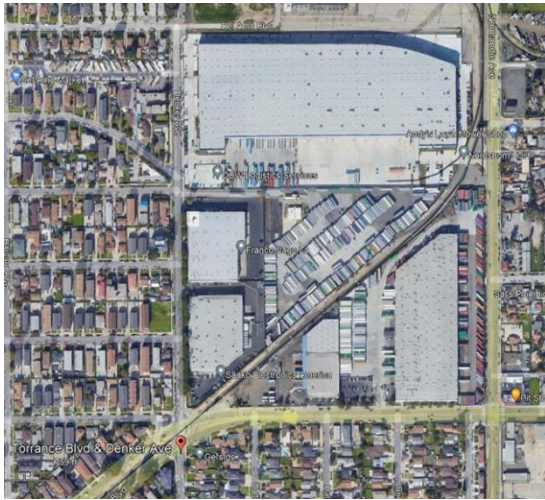
INDUSTRIAL USES WHICH ARE SAFE FOR THE ENVIRONMENT AND THE WORKFORCE, AND WHICH HAVE A MINIMAL ADVERSE IMPACT ON ADJACENT RESIDENTIAL AND OTHER SENSITIVE USES.

EJ 7.1

“Encourage existing industrial businesses to improve the physical appearance of their properties with adequate screening and landscaping when adjacent to residential or other sensitive uses and require such improvements for the establishment of new businesses in order to reduce environmental impacts.”

EJ 7.6

“Discourage the intensification of existing industrial and auto-related businesses\uses through the co-location or addition of supplementary uses, particularly near sensitive uses.”



EJ 7.1 Please start here, Denker Ave. between Torrance Blvd. and Del Amo.! This is a horrible mess and fits your description of this goal perfectly.



EJ 7.6 Del Amo Alley is an area where landuse plans collide; City plans call for “hybrid” industrial and the County plan maintaining a long established residential neighborhood identified as environmentally burdened.

GOAL EJ 8

INDUSTRIAL AREAS WITH QUALITY INDUSTRIAL AND COMMERCIAL DEVELOPMENT THAT DOES NOT CREATE DETRIMENTAL VISUAL IMPACTS ON ADJACENT RESIDENTIAL AREAS, COMMERCIAL AREAS, AND RECREATIONAL AMENITIES.

- Good steps to reach this goal.
- This problem exists at Torrance Blvd. and Normandie Ave.
- Enforcement collaborations will need to be established so the burden to oversee compliance doesn’t fall to the least equipped to enforce it; the impacted communities.

GOAL EJ 9

HYBRID INDUSTRIAL AREAS WITH CREATIVE OFFICE, AND LIGHT INDUSTRIAL USES AND COMMERCIAL BUSINESSES THAT SERVE AS A BUFFER BETWEEN INDUSTRIAL AREAS AND RESIDENTIAL NEIGHBORHOODS.

EJ 9.1

Remove “Hybrid Industrial” and use commercial to send a clear message of transition.

PETROLEUM RELATED ACTIVITIES

Need to work with the Department of Public Health and their abandonment process to protect residents.

GOAL EJ 10

OIL AND NATURAL RESOURCES EXTRACTION ACTIVITIES THAT ARE PERFORMED WITH THE GREATEST REGARD FOR PUBLIC AND ENVIRONMENTAL HEALTH, SAFETY AND WELFARE, WHILE PROVIDING FOR REASONABLE UTILIZATION OF THE AREA’S OIL AND NATURAL RESOURCES.

Good objectives to reach outlined goals.

Oil and people DO NOT MIX! We now know so much more about public health protections then when this type of citing of extraction sites was allowed unfettered.

GOAL EJ 11

A HEALTHY AND LIVABLE COMMUNITY WHERE COLLABORATIVE EFFORTS TO REDUCE THE FOOTPRINT OF THE PETROLEUM INDUSTRY WITHIN RESIDENTIAL NEIGHBORHOODS ARE ADVANCED.

EJ 11.1 – EJ 11.4

Good set of objectives.

Chapter 4

MOBILITY & CONNECTIVITY

“The Plan includes important policies that address goods movement as a result of the placement of three freeways intersecting the Plan Area, vehicular travel between jurisdictions, proximity to Port of Los Angeles related industries, and large industrial districts. All of which contribute unfavorable environmental impacts on the residents of the Plan Area.”

THANK YOU for stating this very serious impact!

GOALS AND POLICIES

GOAL MC 1

AN EFFICIENT CIRCULATION SYSTEM WITH SAFE, CLEAN, AND WELL-MAINTAINED STREETS THAT PROVIDE ENHANCED ACCESS AND CONNECTIVITY AND BALANCE THE NEEDS OF MULTIPLE INTERESTS AND FUNCTIONS.

Good objectives to meet this goal.

MC 1.1

Denker between Torrance Blvd. and Del Amo; what is the plan for this area?

GOAL MC 2

AN EXPANDED AND EFFICIENT TRANSIT NETWORK THAT IMPROVES MOBILITY WITH CONVENIENT ALTERNATIVES TO AUTOMOBILE TRAVEL.

MC 2.1

We would love to partner with you in a request for a transportation oriented design for the Plan Area boarding West Carson.

MC 2.5

“Improve the travel experience for bus riders by ensuring bus stops provide sufficient shelter and seating, and are equipped with technology that includes but not limited to real-time passenger information display systems, charging stations and solar lighting.”

This is so important; many of the transit stops in the planning area are in gravel along the train tracks with nothing (benches, shade, etc.). This is pretty easy to fix and hope it is first in line to get done in the implementation plan.

GOAL MC 3

A SYSTEM WITH ALTERNATIVE MODES OF TRANSPORTATION THAT REDUCES VEHICULAR TRIPS AND SINGLE OCCUPANT VEHICLES (SOV) IN ORDER TO IMPROVE AIR QUALITY AND THE HEALTH OF RESIDENTS.

MC 3.1

“Encourage mixed-use developments....”

Caution should be taken with mixed uses, sounds good in practice but not always compatible with the pollution and congestion transportation corridors can bring.

GOAL MC 4

A SAFE, COMPREHENSIVE, AND INTEGRATED BIKEWAY NETWORK THAT IS ACCESSIBLE TO ALL, AND ENCOURAGES BICYCLING FOR RECREATION AND TRANSPORTATION AND PROVIDES ACCESS TO TRANSIT AND KEY DESTINATIONS.

MC 4.4

“Support the creation of a bike share program as a means to connect areas that are less served by transit.”

Review this concept well: bikes left on sidewalks and of ill repair are BIG hazards.

GOAL MC 5

PEDESTRIAN-ORIENTED ACCESS AND ROUTES THAT ARE SAFE, EFFICIENT AND ATTRACTIVE FOR A VARIETY OF USES INCLUDING COMMUTER, SCHOOL, RECREATION AND ECONOMIC ACTIVITY.

MC 5

Separate vehicle, cycle and pedestrian traffic patterns.

GOAL MC 6

A COMMUNITY WHERE GOODS AND SERVICES CAN BE DELIVERED TO ITS RESIDENTS AND BUSINESSES SAFELY AND EFFICIENTLY, WHILE MAINTAINING THE COMMUNITY’S CHARACTER AND QUALITY OF LIFE.

MC 6.1

This objective needs to be uplifted!

MC 6.3 and 6.4

Make sure facilities use off street parking; not like on Denker Ave. They are skirting the laws meant to protect the community sharing the same roadway putting them in danger.

GOAL MC 7

A PARKING SUPPLY THAT IS EFFICIENT, SERVES ECONOMIC DEVELOPMENT AND FACILITATES ALL MODE OF TRANSPORTATION.

MC 7.6

Enforcement is the key to success.

MC 7.8

Install anti idling signs (California Air Resources Board) along areas like Denker Ave., which is a shared space with an environmental justice identified community.

Chapter 5

PUBLIC REALM AND OPEN SPACE

This is a key piece to co-existence in this Area Plan.

Need to expand bike path areas.

A strong implementation plan will be a key component to success.

GOALS AND POLICIES

GOAL PO 1

A COMMUNITY WITH ADEQUATE OPEN SPACE, RECREATIONAL AND PARK FACILITIES THAT SERVE EVERY NEIGHBORHOOD IN HARBOR GATEWAY.

PO 1.5

“Advance opportunities to repurpose vacant or underutilized lots, including publicly owned site and properly sealed oil well sites, for parks and open space.”

Precautionary measures on all land with questionable remediation. As an example Wishing Tree Park; for community we needed agreement to a 2 foot of clean soil cap across the 8.5 acre site.

PO 1.8, PO 1.9, PO 1.10 and PO 1.12

These speak directly to what the Del Amo Action Committee achieved with our excellent partners the Los Angeles Neighborhood Land Trust for our Wishing Tree Park an example of success.

PO 1.13

Shared space is a very important and smart planning tool.

PO 1.16

The warehouse developers are snatching up these potential park and open space properties.

PO 1.17

Good, will slow traffic in residential areas.

PO 1.18

Huge makeover in these areas is needed.

GOAL PO 3

UNIQUE WILDLIFE HABITATS AND ECOLOGICALLY IMPORTANT AREAS WITHIN PARKS AND RECREATION AREAS THAT ARE PRESERVED IN A NATURAL STATE, FOR THE PROTECTION OF PLANT AND ANIMAL SPECIES, AND FOR PUBLIC ENJOYMENT.

These are important objectives for a very important and balanced land use plan for this area.

PO 3

Restoration, not just preservation, of these important areas needs to occur.

PO 3.4

Stormwater catchments need to be developed on clean properties or contaminants that may be concentrated there, in some cases, can enter the groundwater.

GOAL PO 4

A COMMUNITY WITH AN AMPLE URBAN FOREST THAT IMPROVES THE ENVIRONMENT, ENHANCES AESTHETICS AND CREATES A SUSTAINABLE MICROCLIMATE.

What are the guidelines for an urban forest?

Is the description of these forests listed in the objectives?

Plant Fruit Trees!

GOAL PO 5

AMPLE OPPORTUNITIES EXIST FOR URBAN FARMING AND COMMUNITY GARDENS THAT PROVIDE FRESH FOOD.

Good Goal.

PO 5.1, PO 5.3 and PO 5.4

Need a way to verbalize or mandate some safety precautions in certain high toxicity areas, (like around the Montrose Superfund site). Safely homegrown produce is the best and requires clean soil, raised beds and no pesticides.

CHAPTER 6

IMPLEMENTATION

The City of Los Angeles needs to cross engage with boarding General Plan Areas like the County of Los Angeles, Torrance, etc.

There are real zone change opportunities at the Superfund Sites like Montrose and Jones chemical. The higher the future landuse projections of these sites like parks, open space and residential the higher the clean-up will be during responsible parties remediation efforts.

THE IMPLEMENTATION PROCESS

Good group but missing a liaison from all impacted residential areas in the Plan Area.

DO NOT leave impacted residents out of these discussions – We need to be able to advocate for ourselves; with a seat at the table.

“While the Community Plan policies and implementation programs are limited to authorities that can be implemented under the jurisdiction of the City of Los Angeles, implementation of some Plan policies may also require coordination and joint actions with numerous local, regional, state, and federal agencies.”

This, right here, will be the key to successful implementation. You need to Highlight this proactive collaboration process.

ZONING REGULATIONS

“The Plan’s zoning regulations are implemented incrementally as each proposed building project and land use change within Harbor Gateway is evaluated by the City for approval.”

How will you prioritize Environmental Justice areas for landuse changes?

“In most cases, non-discretionary or “by-right” projects are reviewed by the Los Angeles Department of Building and Safety, where the majority of the development regulations enacted by the Plan are enforced.”

Must get rid of “By-Right”; this is a very dangerous loophole that puts warehouses directly in environmental justice communities. This is how a moderate warehouse (Farmers Bros) was easily replaced with a monolith warehouse (Bridgepoint II).

COMMUNITY BENEFITS SYSTEM (in process)

We have concerns about the tradeoffs often made in these agreements. Some projects, no matter what the perk of the project, are not compatible with a healthy thriving neighborhood.

COMMUNITY PLAN AMENDMENTS

We agree very much with the statement about the necessity to establish a well-defined process to govern how amendments occur.

FUTURE IMPLEMENTATION ACTIONS

ESTABLISHED PROGRAMS

P1, include a role of environmental justice representation.

PROPOSED PROGRAMS

P7, need a redevelopment focused body that includes residents as well as non-profits. Missing partners are the United States Environmental Protection Agency and Department of Toxic Substance Control.

P9, especially in environmental justice communities.

P10, Good

P11, include County Planners and other planning jurisdictions.

P14, Not on brownfields (or) mixed use.

P17, this is BOLD and so so greatly needed!!

P19, Agency collaborations (Resource Sharing). Form Enforcement Teams.

P21, Create RV parks for homeless RV families, etc. that are subsidized to pay for hookups and maintenance. Otherwise we are just shuffling homeless from one location to another.

P23, NICE ☺

P24, Convert to open space and pocket parks.

P25 (two P25), let's work together to set up something up; even quarterly meetings would help us be proactive. Del Amo Action Committee will help.

MOBILITY AND CONNECTIVITY

P26, P27 and P28, the Del Amo Action Committee did a recent traffic study around our West Carson area. One huge problem we never realized before was the vibration from the trucks; it is cracking homes (especially older ones). Our data is still in a rather raw stage but we are happy to share our results and help out in any way we can.

P30, would be super helpful along Denker Ave. between Torrance Blvd. and Del Amo.

PUBLIC REALM AND OPEN SPACE

P33, include Gang Intervention Goals and Programs

P34, partner with community groups.

P35, ☺

P37, ☺ Trails to rails and Clean Up Green Up.

P37 (two P37), "Access to Dominguez Channel:" this could happen fairly quickly ☺

Link to our community vision plan, a living document:

<https://documentcloud.adobe.com/link/track?uri=urn:aaid:scds:US:1c3940b2-02e0-4449-9403-22967ff59860>

Sincerely,
Cynthia Babich
Director, Del Amo Action Committee
Coordinador, Los Angeles Environmental Justice Network
delamoactioncommittee@gmail.com



November 2023

City of Los Angeles, Department of City Planning
Attn: Christopher Pina, City Planner
Case Numbers: CPC-2018-6402-CPU and ENV-2019-3379-EIR
200 N. Spring St., Room 667
Los Angeles, CA. 90012

Sent Via Email: Christopher.pina@lacity.org

Comments on: Harbor LA Community Plans Update – Draft Environmental Impact Report - September 2023

Christopher Pina and City Planning Team,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Harbor LA Community Plans (CPA's). This DEIR is an opportunity to move the dial closer towards an equitable balance between legacy toxic waste sites, industrial areas that border environmental justice communities and AB1000. The Del Amo Action Committee has been engaged with area land use planning for decades.

This DEIR furthers steps towards the transformation needed to protect the most vulnerable communities living in the CPAs but must go further to rectify the imbalance that began long ago with redlining. Environmental injustices are real and have had health derailing consequences on many generations living in our communities; low-income communities of color are in need of critical protections long overdue them.

This DEIR needs be guided by environmental justice laws instituted to protect the very communities represented in the CPAs of this DEIR. We believe that more hard decisions need to be made. "By-Right" is still a giant impediment to the change that must occur. While the DEIR addresses some specific facility types that would require a proper planning review and not a "By-Right" free pass; leaving this loop hole in place leads us back down the same path that has been detrimental to our health and is reflected by the alarming score this area receives from CalEnvrioScreen (a tool used to compare the pollution burden of communities across California) of 96% -100%, meaning that the communities in this planning area are MORE saturated with pollution when compared to other communities across the State.

Such a built-out environment in Los Angeles requires all new projects to go through stringent planning evaluations and reviews. The competition is stiff between the needed green spaces, pocket parks, recreational areas and "by-right" (more of the same) industrial warehouses and a business-as-usual planning effort.

Green zones, vegetation walls and open space need to become the buffer zones for our most damaged and vulnerable neighborhoods not more of the same "By-Right" pollution impacts.

Staff

Cynthia Babich
Director

Cynthia Medina
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We offer our comments to strengthen the CPAs, a transition to a more neighborhood equitable future and to support BOLD actions that must be taken to truly protect the health of resident's overburden by pollution for so very long. We wish to support the hard decisions that must be made to bring this planning area into balance. We seek to continue to work with you as the plan is implemented in a spirit of partnership and collaboration.

The primary objective of the California Environmental Quality Act is to enhance the public's participation in the planning process. The inclusion of laws and authorities into this DEIR makes for a comprehensive document that helps to ensure we are all on the same page, especially with the most contaminated Superfund Sites.

We appreciate the section on "areas of controversy/issues to be resolved". We would like to underline the importance of addressing these issues that have been vocalized for decades by the community, specifically: traffic, noise, transportation corridors, air quality, consistency with transportation and growth planning, incompatible land uses all of which are environmental justice issues. These are issues dealing with life and death inequities, not mere inconveniences.

The project objectives need to be closely aligned with the many stated long-term priorities community improvement that were outlined in the draft Harbor Gateway plan. We would especially like to uplift the importance of the following bullets in the Harbor Gateway plan:

- Address the legacy of contamination and advance environmental justice goals
- Support a clean Dominguez Channel, improved air and water quality and remediation of superfund and brownfield sites
- Reduce negative health impacts by restricting new uses that are detrimental to the health and welfare of the community
- Improve land use compatibility by creating buffers and transitions between heavy/intense uses and residential neighborhoods
- Promote a diversity of uses that support healthy living and community needs
- Support the development of public realm and streetscape improvements including improvements that will have a cooling effect
- Encourage innovative and green industries that provide a greater number of jobs for local youth and residents
- Develop partnerships between local unions, employers, chambers of commerce, workforce development programs, and job recruiters to create career pathways for local youth
- Encourage improvements to existing businesses to upgrade the visual quality of industrial areas
- Ensure that goods movement respects residential neighborhoods and follows appropriate routes (*Denker Ave., Torrance Blvd. and Normandie are prime examples of this need*)
- Improve access to, and connectivity between, parks, recreation centers, open spaces, neighborhoods, and waterways such as the Dominguez Channel
- Encourage the creation of public spaces for people to gather and interact
- Connect neighborhood to amenities like the Dominguez Channel and adjacent bike path

Open Space: Consider this designation as an excellent transitional space and residential buffer zone. All industrial designations should have an open green space buffer, especially locations like the "Hybrid Industrial" strip of land along the Del Amo Alley adjacent to the beginning of the residential area of West Carson.

“Proposed” Hybrid Industrial: These areas include two of the most toxic sites in the country containing “legacy wastes”. Important steps must evolve over time like complete cleanups. These areas need forethought and upfront planning. If a site is zoned “Industrial” that is the level of cleanup it will receive under CERCLA; cleanup is based on anticipated future land use. Need to advocate and plan for future land use that will achieve the highest cleanup to maximize future uses. If not appropriately remediated a “live-work” scenario will not be health protective and this option should be removed from this description.

Industrial: These areas should be designated and located as far from residential areas as possible including relocating them if needed. Just adding” Light or Hybrid” in front of Industrial does not meet the stated objectives of Environmental Justice. Industrial areas and neighborhoods **Do Not Mix** –These areas must not be embedded in communities; like the Montrose and Jones Chemical sites adjacent to residential neighborhoods. Jones Chemical has a dangerous potential for a chlorine release or tanker catastrophe. This facility stores 1.8 million pounds of Chlorine on site; brought by train through this planning area. Up to 12 tanker cars of chlorine gas arrive at the Jones Chemical site per week. The toxic contamination from these sites is killing residents in the areas.

Light industrial and hybrid industrial areas are proposed to serve as improved transition zones between heavy industrial land and residential or commercial areas.” **This is a very bad policy!** Open space green zones should be the transition spaces between industrial and residential.

General comments on Project impacts, mitigation measures and residual impacts.

Overarching Comment:

The area of the CPAs is already overbuilt and in need of rearrangement. The opportunity to rearrange seems to go hand in hand with redevelopment. All new proposed projects should be required to go through planning for a permit and there should be a discontinuance of all “By-Right Development”.

Mitigation Measures

Air Quality – “Local jurisdictions have the responsibility for determining land use compatibility for sensitive receptors.”

AQ-2: Must utilize electrical equipment as a requirement; no additional diesel sources should be introduced into non-attainment areas.

AQ-3: Environmental cumulative impacts must be considered. Three minutes idling at the most. Queuing in areas outside the residential areas much be employed as feasible.

AQ-4: Getting power from solar panels is a better suggestion/requirement.

AQ-5: Only electrified equipment should be allowed near sensitive receptors/communities.

There might be a duplicative paragraph at the end of AQ-5 that seems repeated in AQ-6.

AQ-7: To many of these trips are though or adjacent to environmental justice neighborhoods.

MM-AQ-9: We appreciate that you are working to address the impact of too many warehouses in the communities the CPAs covers. We appreciate the sensitivity and complication around understanding the health impacts from cumulative sources. This is a task all agencies and decision makers must take head on; especially with new mandates specifically to address them.

Cultural Resources

Impact 4.4-1: Preservation of all cultural resources should be a top priority.

Greenhouse Gases

Impact 4.7-1: How was the less than significant determination of consistency of AB32 made?

Hazards and Hazardous Materials “Major corridors which may be used by trucks to transport hazardous materials throughout the Harbor LA CPAs include I-10, Alameda Street, Wilmington Boulevard, Pacific Coast Highway, Vermont Avenue and Normandie Avenue. Hazardous materials are also moved by rail along the eastern edge of Wilmington-harbor City CPA along the Union Pacific rail lines serving the port.” These may be major corridors but the infrastructure has not kept up with the increased demand; leaving the residents to deal with crumbling roads, lack of turn lanes, out of sync signals (especially where City and County jurisdictions meet) and horrible congestion which cause risky behavior in drivers. Adding hazardous waste transportation to the equation is of considerable concern. This is also of concern with the rail lines bringing Chlorine tankers directly into these highly populated areas.

Using an environmental justice lens, we need a plan that also looks back to understand how these dangerous companies became embedded in our community so that we can rectify these legacy hazardous waste issues.

MM HAZ-1: Thank you this is so important. Equally important is requiring a Phase 1 Environmental Assessment. The Del Amo Alley should require a Phase 1.

Impact 4.8-6: Important that you noted including analysis of adjacent Community Plans when addressing Cumulative Impacts.

Jones Chemical does not have an emergency evacuation plan for the nearby communities, do they?

Table 4.8-3: Policy 1.17 and 2.17 Building Community Capacity

Can you identify examples you would implement around Community Capacity Building? We think that this guidance would be very important to clearly define.

Land Use and Planning

Impact 4.10-2: Concerns remaining around Superfund Site proximity to community and Boys and Girls Club which is also adjacent to Jones Chemical.

Noise

Impact 4.12-1: Houses in the Harbor Gateway are currently being impacted by exceedances in noise and vibration damage. There needs to be a plan to address this.

MM-NO1-6: A Noise Study should be prepared for all projects adjacent to sensitive receptors.

Table 4.12-7 Ambient Noise Levels

When you have residential and commercial areas next to each other in different jurisdictions, like in Del Amo Alley, which presumed ambient noise levels are used?

Fire Services

Impact 4.14-1 Jones Chemical – one way in and one way out on Denker Ave.

Schools

Impact 4.14-3 Would this apply to the Boys and Girls Club on Denker Ave.?

Recreation

Impact 4.14-5 When development or redevelopment is proposed special overriding consideration to create a new park space needs to be a priority! Warehouse are displacing green space opportunities.

Transportation and Traffic

Impact 4.15-2 Work with the California Air Resources Board on a plan to avoid any additional air pollution burden in the already overburden air ways in communities in the CPAs and adjacent jurisdictions.

It is mitigatable when we prioritize environmental justice and cease additional impacts. The Harbor Gateway area has recently increased warehouses and new increases are expected. Do better preplanning on what business should be allowable in already impacted environmental justice areas. The intersection of Torrance and Normandie is ETREMELY DANGEROUS; which has Jones Chemical Chlorine tankers (a city business) using an already hazardous intersection. It is an accident waiting to happen.

In the proposed mobility network, the final bullet under Harbor Gateway (East-West) Streets it states “Del Amo Boulevard from Western Avenue to Denker Avenue Reclassification from Avenue I to Modified Industrial Collector”, what does this mean???

The challenge we found in reviewing this Draft Environmental Impact Review is threefold:

1. Combining the Harbor Gateway and the Wilmington plans creates confusion. The readers may be familiar with their area and not with the other community which cause them to have to sort it out and increases the reading material of the document.
2. It has a vagueness to it because it is not project specific and causes the reader to move between concrete facts and unknowns.
3. Finally, the options are very limited. Alternative 1 – Do nothing now and remain using a plan from 1999; a plan that created some of the injustice we are facing today or Alternative 2 – move forward with some significant important changes but yet still missing the goal of achieving the balance sought for in the Harbor Gateway Plan.

Since these are the options given to us, public reviewers, we support moving forward with the updates to a community specific plan and will continue to work in collaboration with City and County Planners to create the changes that would bring about true environmental equity in each planning area and cross jurisdictionally.

Sincerely,
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Communication from Public

Name: Rosalie Preston

Date Submitted: 08/25/2025 10:21 AM

Council File No: 25-0775

Comments for Public Posting: I support the proposed updates to the Harbor Gateway Community Plan, an update which is very overdue, and urge the PLUM Committee and City Council to adopt it. The Plan provides support for buffers between industrial uses and residential and other sensitive uses which are lacking now, as well as Conservation District protections to a number of our unique residential neighborhoods.