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(213) 978-1300

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CALIFORNIA**



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EXECUTIVE OFFICES

200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
(213) 978-1271

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December 04, 2025

Los Angeles City Council
c/o Office of the City Clerk
City Hall, Room 395
Los Angeles, California 90012

Attention: PLUM Committee

Dear Honorable Members:

**APPEAL OF CASE NO. CPC-2022-6859-GPA-HD-ZAD-WDI, FOR PROPERTY LOCATED AT
1420 NORTH COIL AVENUE; CF 25-1198-S1**

The project involves improvement and expansion of an existing one-story, 42-foot tall, 221,496 square-foot cold storage facility, resulting in a two-story, 65-foot tall, 267,960 square foot facility, with a total 0.36:1 Floor Area Ratio (FAR). The expansion includes the demolition of 27,157 square feet of an existing cold dock for a new 71,331 square foot freezer, resulting in a net addition of 44,174 square feet of new floor area. The improvements include 2,290 square feet of a new engine/mechanical room, electrical room, and fire pump room. The Project also involves a new automated racking system, other interior improvements, and reducing the length of the existing double rail spur. The Project will provide 114 parking spaces, with no trees to be removed, and the grading of less than 500 cubic yards of soil and import of 7,000 cubic yards of soil.

On August 14, 2025 the City Planning Commission ("CPC") approved and recommended City Council to adopt a General Plan Amendment and Height District Change. The CPC also approved a Zoning Administrator Determination to allow transitional height of 65 feet in lieu of 61 feet, and a Waiver of Dedication and Improvements ("WDI") for improvements along Drumm Avenue, and denied a WDI for Coil Avenue. The CPC determined that after consideration of the whole of the administrative record, including the Negative Declaration, No. ENV-2022-6860-ND there is no substantial evidence that the project will have a significant effect on the environment and adopted the Negative Declaration.

On October 10, 2025, an appeal was filed by an aggrieved party (Coalition for Responsible Equitable Economic Development Los Angeles, CREEDLA) to the City Council (Case No. CPC-2022-6859-GPA-HD-ZAD-WDI, Council File No. 25-1198-S1) against the entirety of the decision.

However, the General Plan Amendment is not appealable per LAMC Section 12.32 D.1. Similarly, only an applicant may appeal the Height District and WDI determinations. Therefore, only the Zoning Administrator Determination is appealable and before City Council for consideration upon appeal. The City Council must also act as the initial decision-maker on the General Plan Amendment and Height District Change under Related Council File No. 25-1198.

The appellant expresses disagreement over the Negative Declaration (ND) findings and asserts the project may have significant air quality and noise impacts. Their appeal justification is based on previously submitted ND comment letter dated June 12, 2025 and supplemental letters dated August 4, 2025, and August 11, 2025. Below is a summary of the appeal points with a staff response to each point.

Appeal Point No. 1:

The appellant's air quality and public health expert, James J. Clark, Ph.D., asserts the construction of the proposed Project would increase the cumulative cancer risk for nearby residential receptors by an additional 2.27 in 1 million. In addition, the ND underestimates the operational emissions because it excluded key emissions sources, including transportation refrigeration units, cargo handling equipment, and fire pups. Dr. Clark's comments and supplemental modeling serve as substantial evidence supporting a fair argument that the Project may have significant, unmitigated air quality and public health risks which were not disclosed or mitigated in the ND, and which the CPC did not address before approving the Project.

Staff Response:

The Negative Declaration published on April 24, 2025, relies on the Air Quality Study prepared by Meridian Consultants, dated September 2024. The City relies on methodology established by the South Coast Air Quality Management District (SCAQMD) for preparation of CEQA air quality analyses. SCAQMD shares responsibility with the California Air Resources Board (CARB) for ensuring that all state and federal ambient air quality standards are achieved and maintained throughout all of Los Angeles County. The Negative Declaration applies SCAQMD's adopted Localized Significance Thresholds (LSTs) as appropriate screening tool for diesel particulate matter (DPM) and cumulative health risk. LSTs are designed to protect sensitive receptors and represent the standard method for evaluating short-term emissions. SCAQMD's CEQA Air Quality Handbook does not recommend analysis of TACs from short-term construction activities associated with land use development projects. In addition, cancer risk is based on a 70-year exposure duration and duration is part of the inputs for cancer risk. As construction results in a short-term exposure period (i.e., approximately 1 year out of a 70-year), further evaluations of TAC emissions are not warranted or required. As demonstrated in the Table 4.3-3:Localized Construction and Operational Emissions of the ND, the emissions would not exceed the localized significance construction and operational thresholds.

While the appellant cites Dr. Clark's independent modeling to suggest a cancer risk of 2.27 in one million, the modeled risk is still below the SCAQMD's currently adopted threshold of 10 in one million. The SCAQMD has not formally adopted the draft cumulative cancer risk significance framework referenced. Agencies are not required to rely on non-final guidance, particularly in the absence of an adopted methodology.

Furthermore, the ND acknowledges that the expansion would result in an addition of approximately 40 trucks/Containers per day, resulting in a total of 160 trucks/containers per day. The truck activity would continue to be conducted by appointment only, therefore no trucks would be idling off-site. The California Air Resources Board's (CARB) TRU Airborne Toxic Control Measure (ATCM) regulates and cap the emissions profile of in-use and new TRUs through required engine upgrades, operational time limits, and idling restrictions. Therefore, the net increase in TRU is not expected to materially increase the project's localized DPM emissions. The project is located in an industrial corridor where similar mobile and stationary emission sources are common. Nonetheless, the appellant asserts that the ND is deficient because the ND does not explicitly quantify emissions from cargo handling equipment such as yard trucks, forklifts, or top picks—equipment. However, CalEEMod emissions outputs from PM10 and PM2.5 include

both exhaust and fugitive dust with the exhaust portion specifically covering diesel particulate matter. Therefore, DPM from modeled diesel sources TRUs, yard equipment and stationary fire pump is included in the reported totals. As shown in Table 4.3-1:Unmitigated Maximum Regional Construction Emissions of the ND, the maximum daily emissions during construction would be below the applicable SCAQMD thresholds. However, to address the concerns raised, the applicant team previously provided supplemental emission analysis prior to City Planning Commission action. The supplemental modeling confirms that emissions from cargo handling equipment when added to the original CalEEMod output – do not meaningfully increase total operational emissions and remain below the SCQMD regional and localized significance thresholds.

The appellants claim that Dr. Clark's modeling serve as substantial evidence supporting fair argument that the Project may have significant, unmitigated air quality and public health risks that were not address before City Planning Commission, however, that does not constitute substantial evidence under CEQA. The methodology and thresholds utilized by Dr. Clark is not supported by regulatory standards or established CEQA practice, nor have been adopted by SCAQMD. The SCAQMD has not formally adopted the draft cumulative cancer risk significance framework referenced. Furthermore, as stated by the applicant team in the initial ND comment response dated June 23, 2025, the appellant mischaracterizes both the legal threshold and evidentiary record in this case. As defined under CEQA Section 15384, "substantial evidence" must consist of facts, reasonable assumptions predicated upon facts, or expert opinion supported by facts. As previously stated the Negative Declaration relies on an initial Study that evaluated the projects effects on air quality using the standard methodologies accepted by regulatory agencies, including emission modeling through CalEEMod. The air quality emissions during construction and operation of the proposed Project would have a less than significant effect on the environment. Furthermore, the proposed Project's maximum daily construction and operational emissions do not exceed the SCAQMD threshold for criteria pollutants.

Appeal Point No. 2: *The noise measurements were unsupported and inconsistent with industry standards and regulatory guidance. The proposed project would generate noise levels up to 82 dBA at the nearest residence. This would exceed the ambient noise level by 11 dBA in violation of the noise levels established. The appellant's technical expert Ms. Toncheva provides substantial evidence supporting a fair argument that the Project may have significant, unmitigated noise impacts which were not disclosed or mitigated in the ND.*

Staff Response:

The Noise Study prepared by Meridian Consultants, dated September 2024 utilizes the most updated noise and vibration thresholds per the Department of City Planning advisory memo dated September 25, 2024¹. These updates, evolved from the December 2023 policy proposal process, establish thresholds that balance realities of urban construction with the need to protect public health and sensitive receptors. The ND applies the adopted 80 dBA Leq daytime threshold for residential receptors- which is considered the appropriate criterion for temporary, non-pile-driving activities during standard construction hours. Per Table 4.13-1:Construction Maximum Noise Estimates of the ND, average noise levels during construction would not result above the thresholds and therefore construction vibration impacts would be less than significant and no mitigation measures are required.

¹ https://planning.lacity.gov/odocument/10d91dc4-da7d-493c-860e-9d0038cf1de2/Update%20CEQA%20Thresholds%20Memo_09.25.2024_Signed.pdf

The analysis done by the appellant asserts the demolition phase would generate 8-hour Leq of 82 dBA at nearby residential receptors. However, the analysis omits critical context and project-specific design features. The appellant's analysis fails to incorporate existing site conditions and Environmental Protection Measures (EPMs) that are integral to the project's design and implementation, thereby limiting its reliability and evidentiary value under CEQA. The Project includes design and operational features- such as noise shielding, equipment muffling, and truck routing controls- that reflect best practices in minimizing off-site effects. Furthermore, as documented in the ND's Noise Study, EPMs NV1-1 through NV1-6 include multiple controls including: properly maintained and muffled equipment, orientation and staging of noisy equipment away from sensitive uses, installation of temporary noise barriers or acoustic blankets around mechanical equipment, and restriction of particularly noisy tasks to daytime hours.

As previously stated, the fair argument needs to be based on "Substantial Evidence." The ND is based on the Noise Study utilizing the most updated noise and vibration thresholds. The construction noise estimates used for the analysis are representative of worst-case conditions because it is unlikely that all the equipment contained on-site would operate simultaneously. The applicant did include supplemental modeling to simulate dock operations in their proposed location in their June 23, 2025 letter in response to Ms. Tonchevas claim of the ND not explicitly including the extended operations into Saturday. The results of the supplemental analysis demonstrate that none of the modeled noise levels represent an increase of 5dBA or more above the existing ambient conditions, the standard CEQA threshold for a potentially significant increase. Furthermore, the ND also acknowledges that all mechanical equipment is required to comply with the City's Municipal Code Section 112.02 and subject to review during the plan check process, therefore additional analysis in the ND is not required. The conclusion that the impacts would be less than significance is based on enforceable regulatory standards, and compliance verified during plan check process.

Conclusion

The appellant raised no new information to dispute the CPC's findings on this matter. CREEDLA's appeal points were initially submitted in their June 12, 2025 letter as comments during the ND comment period. The applicant team submitted a response letter dated June 23, 2025, addressing the concerns and providing supplemental modeling tests that confirm the project had less than significant environmental impacts. The ND relied on a robust administrative record which includes project-specific technical studies, supplemental analyses, and enforceable Environmental Performance Measures (EPMs). All studies were completed using standard methodologies and the adopted thresholds. These documents were consistently available in the case file and the City Planning Commission considered them when taking action on August 14, 2025. The City Planning Commission adopted findings consistent with both CEQA and the City's General Plan policies.

Planning Staff recommends the PLUM Committee deny the appeal, and sustain the CPC's action in approving Case No. CPC-2022-6859-GPA-HD-ZAD-WDI.

Sincerely,

VINCENT P. BERTONI, AICP
Director of Planning

Connie Chauv

Connie Chauv
Senior City Planner

VPB:TLI:CC:NM

Enclosures:

Attachment 1: Staff Recommendation Report to City Planning Commission, dated
August 14, 2025



DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

City Planning Commission

Date: August 14, 2025
Time: after 8:30 a.m.
Place: Los Angeles City Hall
Council Chambers
200 North Spring Street, Room 340
Los Angeles, CA 90012

This meeting may be available virtually, in a hybrid format. Please check the meeting agenda approximately 72 hours before the meeting for additional information at: <https://planning.lacity.org/about/commissions-boards-hearings> and/or by contacting cpc@lacity.org

Case No.: CPC-2022-6859-GPA-HD-ZAD-WDI¹
CEQA No.: ENV-2022-6860-ND
Incidental Cases: N/A
Related Cases: N/A
Council No.: 15 – McOsker
Plan Area: Wilmington-Harbor City
Plan Overlay: Clean Up Green Up
Certified NC: Wilmington
GPLU: Heavy Industrial, Light Industrial²
Previous Zone: [Q]M3-1VL-CUGU, [Q]MR2-1VL-CUGU

Public Hearing: May 28, 2025

Applicant/ Representative: Konoike Pacific Calif Inc, John Parker, Pacific Crest Consultants

Appeal Status: General Plan Amendment is not appealable. Height District Change appealable by applicant if denied. Zoning Administrator's Determination, and Waiver of Dedication and Improvements are appealable to City Council.

Expiration Date: August 19, 2025

Multiple Approval: Yes

PROJECT LOCATION: **1420, 1500 North Coil Avenue; 1532, 1540, 1542 North Alameda Street**
(legally described as Lots 1 (Arb 1); 3 (Arb 1); 60-70; VAC 94-2229585; PT MARIA DOLORES DOMINGUEZ DE WATSON 3365.9 (Arb 3), Block None, Tract Rancho San Pedro, 13038, TR 12257, TR 1513)

PROPOSED PROJECT: The project involves the improvement and expansion of an existing one-story, 42-foot tall, 221,496 square-foot cold storage facility, resulting in a two-story, 65-foot tall, 267,960 square foot facility, with a total 0.36:1 Floor Area Ratio ("FAR"). The expansion includes the demolition of 27,157 square feet of an existing cold dock for a new 71,331 square feet freezer, resulting in a net addition of 44,174 square feet of new floor area. The improvements include 2,290 square feet of a new engine/mechanical room, electrical room, and fire pump room. The project also involves a new automated racking system, other interior improvements, and

¹ The case was filed on September 22, 2022, prior to the effective date of the New Zoning Code (Chapter 1A - Process and Procedures). Therefore, the case is vested to and subject to the Original Zoning Code.

² The site is designated as Light Industrial and Heavy Industrial in the Wilmington – Harbor City Community Plan Map which was last updated in 1999. Although ZIMAS identifies the site as being within Light Manufacturing and Heavy Manufacturing, the City of Los Angeles Department of City Planning does not guarantee the accuracy or reliability of the information transmitted from this website. Therefore, the Community Plan Map land use designations shall prevail.

reducing the length of the existing double rail spur. The project will provide 114 parking spaces, with no (0) trees to be removed, and the grading of less than 500 cubic yards of soil and import of 7,000 cubic yards of soil.

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines Section 15074(b), consideration of the whole of the administrative record, including the Negative Declaration, No. ENV-2022-6860-ND ("Negative Declaration"), and all comments received, that there is no substantial evidence that the project will have a significant effect on the environment. Find the Negative Declaration reflects the independent judgement and analysis of the City; Adopt Negative Declaration.
2. Pursuant to City Charter Section 555 and Los Angeles Municipal Code ("LAMC") Section 11.5.6, a General Plan Amendment to the Wilmington-Harbor City Community Plan to amend Footnote No. 10 of the Community Plan Map to allow a 65-foot height limit, in lieu of the 45 feet otherwise allowed.
3. Pursuant to LAMC Section 12.32, a Height District Change from Height District No. 1VL to 1LD.
4. Pursuant to LAMC Section 12.24.X.22, a Zoning Administrator Determination to allow Transitional Height of 65 feet within a distance of 100 to 199 feet from the R1 zone, in lieu of the Transitional Height of 61 feet otherwise allowed by LAMC 12.21.1.A.10.
5. Pursuant to LAMC Section 12.37, a Waiver of Dedication and Improvements from a 15-foot dedication and all improvement requirements a long Coil Avenue, and from a 10-foot dedication and all improvement requirements along Drumm Avenue, which adjoin the project site's frontages.

RECOMMENDED ACTIONS:

1. **Find**, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Negative Declaration, No. ENV-2022-6860-ND ("Negative Declaration"), and all comments received, there is no substantial evidence that the project will have a significant effect on the environment; **Find** the Negative Declaration reflects the independent judgment and analysis of the City; **Adopt** the Negative Declaration;
2. **Approve and Recommend**, pursuant to City Charter Section 555 and Los Angeles Municipal Code ("LAMC") Section 11.5.6, adoption of a resolution for a **General Plan Amendment** to the Wilmington-Harbor City Community Plan to amend Footnote No. 10 of the Community Plan Map to allow a site-specific 65-foot height limit, in lieu of the 45 feet otherwise allowed;
3. **Approve and Recommend**, pursuant to LAMC Section 12.32, adoption of an ordinance for a **Height District Change** from Height District No. 1VL to 1L;
4. **Approve**, pursuant to LAMC Section 12.24.X.22, a Zoning Administrator Determination to allow Transitional Height of 65 feet within a distance of 100 to 199 feet from the R1 zone, in lieu of the Transitional Height of 61 feet otherwise allowed by LAMC 12.21.1.A.10;
5. **Approve**, pursuant to LAMC Section 12.37, a Waiver of Dedication and Improvements from a 10-foot dedication and some improvement requirements along Drumm Avenue;
6. **Deny** pursuant to LAMC Section 12.37, a Waiver of Dedication and Improvements from a 15-foot dedication and all improvement requirements along Coil Avenue.

VINCENT P. BERTONI, AICP
Director of Planning



Theodore L. Irving, AICP, Principal City Planner



Connie Chauv, Senior City Planner



Norali Martinez, City Planner
Norali.martinez@lacity.org
Telephone: (213) 978-1346

ADVICE TO PUBLIC: *The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the *Commission Secretariat, Room 273, City Hall, 200 North Spring Street, Los Angeles, CA 90012* (Phone No. 213-978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent to the week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendaized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to these programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request not later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1300.

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PROJECT ANALYSIS

PROJECT SUMMARY

The site is currently improved with an existing one-story, 42-foot tall, 221,496 square-foot cold storage facility and office space. The warehouse portion of the building is comprised of covered loading docks, air-conditioned docks, and freezer area totaling 212,249 square-feet. There are two stories of office space, totaling 9,247 square feet. The existing office building is located on the east side of the property off Alameda Street. The existing railroad spurs are located on the northwest side of the property. The primary site entrance is at the end of Coil Street, intersecting O Street, where there is currently a guardhouse. Truck parking stalls are located all along the building perimeter. There is also truck parking along the tail end of the property, ending on Pacific Coast Highway. Car parking spaces are located all along the property line perimeter, concentrated along O Street and Alameda Street. There are two emergency fire access driveways along Drumm Avenue, however, no other vehicular access is allowed from Drumm Avenue.

The proposed scope of work involves the improvement and expansion of the cold storage facility. Specifically, the scope of work includes the demolition of an existing 27,157 square foot cold dock located along the west side of the building closer to Drumm Avenue. The existing cold dock will be replaced with a new 71,331 square-foot freezer, resulting in a new addition of 44,174 square feet of new floor area. The improvements include 2,290 square feet of new engine/mechanical room, electrical room, and fire pump located along the south side along O Street. The project also involves the improvement of a new automated racking system, as well as other interior improvements.

The proposed project will result in a two-story, 65-foot tall, 267,960 square-foot facility, with a total FAR of 0.36:1. The number of trains unloading stations will decrease from 18 to 6 stations. The project proposes a total of 114 parking spaces. The project will maintain its operations of two 8-hour shifts Monday to Friday and proposes to add a new one 8 hour shift on Saturdays. The project proposes grading of less than 500 cubic yards of soil and import of 7,000 cubic yards of soil. The tree disclosure statement, signed by Rick Burke dated August 29, 2022, and tree letter dated August 26, 2022, stated that there are no street trees located on the public right-of-way abutting the project site. No (0) protected trees will be removed from the subject site, and no (0) street trees will be removed from the adjacent public right-of-way.

BACKGROUND

Subject Property

The project site is located in the Wilmington-Harbor City Community Plan at the northeastern corner of the intersection of Drumm Avenue and Pacific Coast Highway. The site is relatively flat, irregularly-shaped, and is comprised of 18 lots totaling approximately 747,302 square feet (17.16 acres). The property is bounded by Drumm Avenue on the west, and Pacific Coast Highway, Coil Avenue, O Street, and Alameda Street along the south and southeast side of the property. The site has approximately 1,994 feet of frontage along Drumm Avenue, 90 feet along Pacific Coast Highway, 751 feet along Coil Avenue, 636 feet along O Street, and 70 feet along Alameda Street.

The project site is located within 4.4 kilometers (2.7 miles) from the Palos Verdes Fault Zone and within a Methane zone. However, the site is not located within the Alquist-Priolo Fault Zone, Liquefaction Zone, Landslide Area, Very High Fire Severity Zone, or BOE Special Grading Area. The site is within a transit priority area.

Zoning and Land Use Designation

The project site is in the Wilmington-Harbor City Community Plan. The site is designated for Light Industrial, and Heavy Industrial land uses. The Light Industrial land use designation corresponds to the MR2, M2 and P zones, and the Heavy Industrial land use designation corresponds to the M3 and P zones. The site is zoned [Q]M3-1VL-CUGU and [Q]MR2-1VL-CUGU which is consistent with the land use designations. Height District No. 1VL limits the Floor Area Ratio ("FAR") to 1.5:1 and building height to three (3) stories and 45 feet.

The site is subject to Footnotes Nos. 5, 10, 11, and 12 of the Community Plan. Footnote No. 5, prohibits new billboard signs within 300 feet of any lot zoned A or R. Footnote No. 10 of the Community Plan Map restricts the site's allowable height to three (3) stories and 45 feet from adjacent grade and a maximum FAR of 1.5:1. Footnote No. 11, limits height to three (3) stories and 45 feet from adjacent grade and maximum FAR of 3:1 within the Wilmington Industrial Park; which the site is not located within its boundary. Footnote No. 12, clarifies that areas proposed for MR1 and MR2 zoning classifications are specifically identified on the Plan Map, which the site is identified as MR2. The site is subject to Qualified "Q" Conditions established under Ordinance No. 177243 (Subareas 40, 50,60), which has certain limitations for open storage uses.

Furthermore, the site is subject to the provisions of LAMC Section 12.21.1.A.10 for Transitional Height. Transitional Height restricts height for portions of buildings on a C or M zoned lot when located within specified distances from the RW1 or more restrictive zone. In this instance, building portions 50 to 99 feet from the R1 zone are limited to a height of 33 feet, and building portions 100 to 199 feet from the R1 zone are limited to a maximum height of 61 feet.

The project site is in the Clean Up Green Up (CUGU) Supplemental Use District. The purpose of the CUGU District is to reduce cumulative health impacts from industrial land-uses and on-road vehicle travel corridors in close proximity to sensitive uses. Furthermore, the site is located in the State Enterprise Zone (ZI File No. 2130), Construction Site Review: Department of Conservation, Division of Oil, Gas, and Geothermal Resources (ZI File No. 1195), Transit Priority Area (ZI File No. 2452), Environmental Protection Measures for Housing Developments in proximity of oil wells (ZI File No. 2536) and is subject to the Trucking-Related Use Regulations Ordinance (ZI File No. 2514).

Surrounding Uses

The subject site is in an urbanized area surrounded primarily by industrial, manufacturing, and single-family residential uses. To the north and east, the subject property is directly adjacent to train tracks in the [Q]M3-1VL-CUGU and [Q]MR2-1VL-CUGU zones. Properties further north are improved with open container storage and chemical processing plant in the [Q]M3-1-CUGU zone. Properties further east across Alameda Street are zoned M3-1VL and improved with parking lot and trucking storage uses. Adjacent buildings to the southeast are improved with manufacturing and parking uses in the [Q]MR2-1VL-CUGU zone. Properties further south across O Street are zoned [Q]MR2-1VL-CUGU and developed with automotive and open storage uses. Properties to the west across Drumm Avenue and to the north of Sandison Street are improved with open storage, parking, and trucking related uses in the [Q]MR2-1VL-CUGU, MR2-1VL-CUGU and [Q]M3-1VL-CUGU zones; south of Sandison Street are single family homes in the R1-1XL-O-CUGU zone; southwest along Pacific Coast Highway are properties developed with commercial retail uses in the [Q]C1-1VL-CUGU zone.

Streets and Circulation

Drumm Avenue, abutting the property to the West, is designated by the Mobility Plan as a Local Street Standard, with a designated right-of-way width of 60 feet and roadway width of 36 feet,

and is currently dedicated to right-of-way width of 40 feet and approximately 33-foot roadway width, with a curb and gutter. The west side of the street also has a sidewalk.

Coil Avenue, abutting the property to the southeast, is designated by the Mobility Plan as a Local Street Standard, with a designated right-of-way width of 60 feet and roadway width of 36 feet, and is currently dedicated to a varying right-of-way width ranging from 30 to 74 feet and approximately 25 to 60 feet of roadway width, with a curb and gutter. Sidewalks are provided only on some sections of the right-of-way.

O Street, abutting the property to south, is designated by the Mobility Plan as a Local Street Standard, with a designated right-of-way width of 60 feet and roadway width of 36 feet, and is currently dedicated to right-of-way width of 50 feet and approximately 39 foot roadway width, with a curb, gutter, and sidewalk.

Pacific Coast Highway, abutting the property to the south, is designated by the Mobility Plan as Boulevard II, with a designated right-of-way width of 110 feet and roadway width of 80 feet, and is currently dedicated to right-of-way width of 100 feet and approximately 82 foot roadway width, with a curb and sidewalk.

Alameda Street, abutting the property to the east, is designated by the Mobility Plan as a Local Street Standard, with a designated right-of-way width of 60 feet and roadway width of 36 feet, and is currently dedicated to right-of-way width of 40 feet and approximately 33 foot roadway width, with a curb, and gutter. The west side of the street also has a sidewalk.

Public Transit

The subject site is within a Transit Priority Area and is located in close proximity to the intersection of Pacific Coast Highway and Watson Avenue which is served by several bus stops including the Los Angeles Department of Transportation Wilmington bus line and Torrance Transit 3 and R3 bus lines, which qualifies as a Major Transit Stop.

Relevant Cases and Building Permits

Subject Site:

Building Permit No. 25014-10000-03041: On July 3, 2025, a Building Permit application was submitted for new 2-story office building attach to existing warehouse building. The permit application was withdrawn.

Building Permit No. 22016-10000-37040: On February 1, 2024, a Building Permit application was finalized for interior tenant improvements to existing office space.

Building Permit No. 22014-10000-06155: On December 20, 2024, a Building Permit application was submitted for the interior remodel and additions to existing cold storage facility. The permit application is pending, and the permit was not issued at the time of preparing this report.

Case No. CPC-2018-6402-CPU: On November 1, 2018, the City filed a case for the Wilmington-Harbor City Community Plan Update. The application is pending and has it is pending adoption at the time of preparing this report.

Surrounding Sites:

None

REQUESTED ACTIONS

The applicant has requested a General Plan Amendment to amend Footnote No. 10 of the Community Plan Map to allow a maximum building of 65 feet, a Height District Change to allow Height District 1L, and a Zoning Administrator Determination to allow transitional height of 65 feet within 100 to 199 feet of the R1 Zone, to allow the proposed project. The proposed General Plan Amendment, Height District Change, and Zoning Administrator Determination would allow a building height of 65-feet for the expansion of the cold storage facility. The additional building height is needed to accommodate recent automated racking freezer technology. The new automated system uses computer-controlled, robotic arms to lift and place products more efficiently. The system needs additional space to lift materials to the top of the stack.

General Plan Amendment

The applicant has requested a General Plan Amendment to amend Footnote No. 10 of the Community Plan Map to allow a site specific 65-foot height limit, in lieu of the 45 feet otherwise allowed.

Height District Change

In conjunction with the requested General Plan Amendment, the applicant has also requested a Height District Change from Height District No. 1VL to Height District No. 1L, with a site-specific limitation of a maximum 65-foot height.

Zoning Administrator Decision

The applicant has requested a Zoning Administrator Determination to allow Transitional Height of 65 feet within the distance of 100 to 199 feet from the R1 Zone, in lieu of the 61 feet for Transitional Height otherwise allowed by LAMC 12.21.1.A.10.

Waiver of Dedication and Improvements

The applicant has requested a Waiver of Dedication and Improvements for 15-foot dedication and all improvements along Coil Avenue, and from 10-foot dedication and all improvements requirements along Drumm Avenue.

CEQA

The City Planning Commission shall consider, pursuant to CEQA Guidelines Section 15074(b), the whole of the administrative record, including the Negative Declaration, No. ENV-2022-6860-ND ("Negative Declaration"), and all comments received. The Negative Declaration and associated environmental documents are provided in the case file and attached as Exhibit E.

ISSUES

Public Hearing

The public hearing was held on May 28, 2025 at approximately 10:30 a.m. Due to concerns over COVID-19, the Public Hearing was conducted in a virtual format. The public hearing was attended by the applicant team (John Parker, Christ Kirikian, Rick Hallenbeck) and approximately six (6)

speakers who provided comments in opposition. Comments in opposition cited concerns regarding truck traffic, a lack of community engagement and benefits, and requested local hiring and skilled trade opportunities. A representative from Council District 15 (Pamela Thornton) spoke in support at the hearing and recommended conditions from the Neighborhood Council.

Updated Scope of Work

Following the Public Hearing of May 28, 2025, the applicant submitted a request to remove the Site Plan Review entitlement as originally requested. The applicant had updated their scope of work to remove the 13,939 square feet of previously proposed office space. The change in scope reduces the total addition from 281,899 square feet to 267,960 square feet; reduces the FAR from 0.38:1 to 0.36:1; and reduces the parking requirement from 117 to 89 parking stalls, with the applicant providing a total of 114 parking stalls. As previously stated, the existing building floor area is 221,496 square feet and the updated total floor area is of 267,960 square feet. Per LAMC Section 16.05-C.1.a – the threshold for Site Plan Review is for the project to create a net increase of 50,000 gross square feet. The updated scope of work has a net increase of 46,464 square feet, which is below the threshold for Site Plan Review.

Land Use and Zoning

The site has been subject to and is being considered for various land use and zoning designations, as follows:

- The site is currently zoned [Q]MR2-1VL-CUGU and [Q]M3-1VL-CUGU. The site has land use designations of Light Industrial, and Heavy Industrial, as a result of the Wilmington-Harbor City Community Plan which was last updated in 1999.
- The applicant proposes a General Plan Amendment to amend Footnote No. 10 of the Community Plan, as well as a Height District Change from Height District No. 1VL to Height District No. 1LD, with a site-specific limitation of a maximum 65-foot height, with a zoning designation of [Q]MR2-1LD-CUGU.
- The site is part of the Community Plan Update initiated on November 1, 2018 under Case No. CPC-2018-6402-CPU. At the time of preparing this report, the site is planned for a land use designation of Light Industrial and [LB3-FX1-18][15-N] zone with unlimited height, however it is not yet adopted or effective.

The table below provides a summary of the various land use and zoning designations and their respective development potential:

	<i>Current</i> <i>(1999 Community Plan)</i>	<i>Proposed</i> <i>(Subject Case)</i>	<i>Planned</i> <i>(2018 Community Plan Update)</i>
GPLU	Light Industrial, Heavy Industrial	Light Industrial, Heavy Industrial	Light Industrial
Zone	[Q]MR2-1VL-CUGU, [Q]M3-1VL-CUGU	[Q]MR2-1LD-CUGU, [Q]M3-1LD-CUGU	[LB3-FX1-18][15-N]
Footnote	45 feet	65 feet	None
Transitional Height within 100-199 feet	61 feet	65 feet	None

Allowable Height	45 feet	65 feet	Unlimited
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The Proposed General Plan Amendment and Height District Change to allow a 65-foot building height will be consistent with the Community Plan Update which will allow unlimited building height.

Height

The project consists of a two-story, 65-foot-tall cold storage facility. The site is zoned [Q]M3-1VL-CUGU and [Q]MR2-1VL-CUGU. Height District No. 1VL limits the Floor Area Ratio ("FAR") to 1.5:1 and building height to three (3) stories and 45 feet. The site is also subject to Footnote No. 10 of the Community Plan Map which restricts the site height to three (3) stories and 45 feet from adjacent grade and a maximum FAR of 1.5:1. Furthermore, the site is subject to the provisions of LAMC Section 12.21.1.A.10 for Transitional Height. Transitional Height restricts heights height for portions of buildings on a C or M zoned lot when located within specified distances from the RW1 or more restrictive zone. In this instance, building portions 50 to 99 feet from the R1 zone are limited to a height of 33 feet, and building portions 100 to 199 feet from the R1 zone are limited to a height limit of 61 feet. The applicant is complying with the 33 feet height limitation within the area of 50-99 feet from residential lot line. However, the applicant is requesting a Zoning Administrator Determination to allow 65 feet within the area of 100 to 199 feet from a residential lot line.

The applicant is requesting a Height District Change from Height District No. 1VL to Height District No. 1LD, with a site-specific "D" limitation of a maximum 65-foot height. Planning Staff recommends the project to be conditioned to a maximum height of 65-feet, with no additional "D" limitation.

The proposed height is consistent with the Community Plan Update proposed height which will allow unlimited building height. Although the project's proposed height currently exceeds the general height of buildings in the surrounding vicinity, the affected portion of the building will not be directly overlooking residential neighbors. The project site is located across the street from the residential neighborhood. There is an existing 8-foot high masonry wall along Drumm Avenue which will be maintained. A proposed improvement includes the addition of a 15-foot depth landscape buffer all along the Drumm Avenue property line. Furthermore, the expansion is affecting only a portion of the building. From the building addition only approximately 313 feet of building frontage is subject to the transitional height limitations. The additional building height is needed to accommodate recent automated racking freezer technology. The automated system uses computer-controlled, robotic arms to lift and place products more efficiently. The system needs additional space to lift materials to the top of the stack.

Traffic

Properties to the west across Drumm Avenue and to the north of Sandison Street are improved with open storage, parking and trucking related uses in the [Q]MR2-1VL-CUGU, MR2-1VL-CUGU and [Q]M3-1VL-CUGU zones; south of Sandison Street are single family homes in the R1-1XL-O-CUGU zone. Residents from the single-family neighborhood have expressed concern regarding increased trucking traffic along Drumm Avenue the last couple of years. However, the primary vehicular access to the site is and will continue to be through Coil Avenue; no vehicular access will be along Drumm Avenue except for LAFD access which will remain gated when not in use. The primary entrance to the site is monitored with a guardhouse at the corner of Coil Avenue and O Street.

Oil Well

The property contains an abandoned oil well, which is located on the northern portion of the site. As identified in ZIMAS by ZI-1195, it requires a Construction Site Well Review (CSWR) to be completed by the California Department of Conservation. However, the plugged and abandoned oil well on the property requires no further action at this time as the planned construction activities for the proposed project will not directly affect the integrity of the abandoned well, as the project design avoids any substantial activities in its vicinity. The California Department of Conservation Division of Oil and Gas issued a Report of Well Abandonment dated March 12, 1990, confirming the oil well has been examined and requirements have been fulfilled. Furthermore, the California Department of Conservation Geologic Energy Management Division issued a CSWR letter dated July 5, 2023, evaluated the proposed scope of work and confirmed the well is over 200 feet from the proposed work area.

Dedications and Improvements

On March 1, 2023, Bureau of Engineering issued Interdepartmental Correspondence requiring the following dedications and improvements:

Dedication Required:

- **Pacific Coast Highway** (Boulevard II/State Highway) – A 5-foot wide strip of land along the property frontage to complete a 55-foot wide half right-of-way in accordance with Boulevard II standards.
- **Coil Avenue** (Local Street) – A 15-foot wide strip of land along the property frontage between Colon Street and O Street and dedicate a partial elbow at the intersection with O Street. Dedicate a 15-foot by 15-foot cut corner or 20-foot radius property line return at the intersection with Pacific Coast Highway.
- **O Street** (Local Street) – A 5-foot wide strip of land along the property frontage to complete a 30 foot wide half right-of-way in accordance with Local Street standards.
- **Drumm Avenue** (Local Street) – A 10-foot wide strip of land along the property frontage to complete a 30-foot wide half right-of-way in accordance with Local Street standards and dedicate a partial elbow at the intersection with Q Street. Dedicate a 20-foot radius property line return at the intersection with Pacific Coast Highway.

Improvements Required:

- **Pacific Coast Highway** – Construct a new 5-foot wide concrete sidewalk in the dedicated area. Obtain Caltrans encroachment permit to upgrade and reconstruct the ADA curb ramps at the northwest corner intersection of Coil Ave and PCH and at the northeast corner intersection of Drumm Ave and PCH. Under Caltrans encroachment permit, construct a 2% cross slope sidewalk at existing dirt. Remove any non-standard items. Upgrade all vaults within the Public Right-of-Way. Any utilities or obstructions that may come in conflict with improvements should be removed or relocated.
- **Coil Avenue** – Construct suitable surfacing to join the existing improvements to provide an 18-foot wide roadway, concrete curb, 2-foot gutter, a 12-foot sidewalk with tree wells, and a partial elbow section with O Street. Construct connecting or receiving curb ramps on the opposite end of a crosswalk (marked or unmarked) to complete the accessible route per Special Order 01- 1020. Upgrade all vaults within the Public Right-of-Way. Any utilities or obstructions that may come in conflict with improvements should be removed or relocated.
- **O Street** – Construct a 10-foot wide concrete sidewalk and repair any broken or off-grade concrete curb and gutter. Connecting or receiving curb ramps to be constructed on the opposite end of a crosswalk (marked or unmarked) to complete the accessible route per

Special Order 01-1020. Remove any landscaping within the Public Right-of-way that will obstruct the construction

- of the improvements. Upgrade all vaults within the Public Right-of-Way. Any utilities or obstructions that may come in conflict with improvements should be removed or relocated.
- **Drumm Avenue** – Construct suitable surfacing to join the existing improvements to provide a 20-foot wide half roadway, concrete curb, 2-foot gutter, a 10-foot wide concrete sidewalk with tree wells, and the partial elbow section with Q Street. Construct connecting or receiving curb ramps on the opposite end of a crosswalk (marked or unmarked) to complete the accessible route per Special Order 01-1020. Upgrade all vaults within the Public Right of-Way. Any utilities or obstructions that may come in conflict with improvements should be removed or relocated. Remove shrubs in public right-of-way that will obstruct the construction of the improvements. Close all unused driveways and upgrade any existing driveways to comply with BOE standards.

The applicant has requested a Waiver of Dedication and Improvements for all the dedication and improvements along Coil Avenue and Drumm Avenue. The applicant has not requested to deviate from the requirements for Pacific Coast Highway or “O” Street; therefore, the project will be required to dedicate and improve the public right-of-way to the satisfaction of the Bureau of Engineering for all streets where a request was not submitted or not approved.

Planning Staff recommends that the Waiver of Dedication and Improvements for Drumm Avenue is GRANTED.

The dedications and improvements required by BOE do not bear any relationship to project impacts, as there are no physical improvements or vehicular access points along Drumm Avenue. There are only two LAFD emergency fire access driveways along Drumm Avenue. The project will maintain an existing 8-foot-tall masonry wall. In addition, a 15-foot-deep landscape setback containing trees spaced 10 feet apart will be provided along the full length of the property's western boundary along Drumm Avenue.

However, Planning Staff recommends that the Waiver of Dedication and Improvements for Coil Avenue –is DENIED.

The primary site entrance is at the end of Coil Street, intersecting O Street, where there is currently a guardhouse. Coil Avenue has a varying roadway width at its narrowest point being approximately 25 feet, which serves as a pinch point. The expansion of a cold storage facility could increase capacity and traffic for the transportation of goods via trucks. Widening of Coil Street can help improve the circulation of trucks and vehicles that travel along Coil Street north of Pacific Coast Highway to the subject site and the other industrial business around the subject site.

Urban Design Studio

The proposed project was reviewed by the Department of City Planning's Urban Design Studio (“UDS”). The resulting comments and suggestions focus primarily on the pedestrian experience, 360-degree design, and climate adaptive design.

Pedestrian First:

- Propose street trees for shade.
- Indicate which are the pedestrian and which are the vehicular points of access. Provide the driveway dimensions on the plans.
- Indicate a pedestrian path of travel from the sidewalk to the main office entrance.

The applicant responded that there is no pedestrian access to the site from the sidewalk. There is a pedestrian path of travel from the parking area to the main office building entrance which is identified in Exhibit A. The project is providing a landscape buffer along Drumm Avenue for the entire length of the property that will include approximately 130 24-inch box trees as required by the CUGU Supplemental Use District. The applicant responded no other fronting streets have sufficient pedestrian traffic since they abut industrial uses to warrant additional street trees.

360° Design:

- Provide elevations that indicate the building's materials per the City's Elevation Instructions.
- Provide additional information and indicate the main entrance and windows for the office building additions.
- Consider building materials, design elements and landscaping that add visual interest to the building's elevations especially where visible from the public right of way and adjacent to residential uses.
- Choose building colors and materials that help reduce the buildings' heat absorption and cooling energy.
- All outdoor lighting systems need to be directed away from the window of any residential uses and comply with the non-residential Light Pollution Reduction standards in the Green Building Code.
- Add and indicate on the plans a "No Idling" signage onsite at the back of the curb and adjacent to the entrance of at least one driveway where truck loading, staging or parking occurs.

The applicant has identified the exterior building materials as metal panel with off-white and slate colors to match the existing building. The building complies with the transitional height setback from 50 to 99 feet from the R1 zone which creates horizontal articulation for a portion of the building addition. As mentioned, there is a 15 feet depth landscape buffer along Drumm Avenue. The applicant responded that building material to reduce heat absorption have been built into the project. The applicant has agreed to include "No Idling" signage adjacent to driveway entrance, staging or parking area.

Climate-Adapted:

- Provide a landscape plan that indicates the location, number, size and species for trees, shrubs and groundcover for every floor that includes open space.
- Indicate the proposed number of trees on the plans.
- Add additional trees on the private property and adjacent to the public right of way to buffer the project from adjacent uses per CUGU and the City's Landscape Ordinance. CUGU requires a minimum of one tree for every 10 linear feet within the project's setback.
- Utilize landscape to screen and buffer the project from the adjacent residential uses.
- Consider additional opportunities to comply with Climate adapted Design with the use of landscaping, green architectural elements and by increasing the site's permeability.
- Select trees and hedges that are between 6 and 8 feet high, low in water use, low in biogenic emissions, high in carbon and particulate matter filtration qualities, and retain foliage for most months of the year. For shrubs and groundcover prefer natives that add year long habitat.
- Indicate the LID calculations.
- Indicate the solar areas and their square footage on the roofs.

In response to the UDS comments, the applicant submitted a landscape plan showing the project will maintain an existing 8-foot-tall masonry wall. As mentioned, a 15-foot-deep landscape setback containing trees 10 feet apart will be provided along the full length of the property's western boundary along Drumm Avenue. The roof plans show solar panel calculations.

Negative Declaration Comments:

A comment letter was received from Adams Broadwell Josheph & Cardozo, dated June 12, 2025 (Exhibit D). The letter on behalf of the Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA"), expresses disagreement over the Negative Declaration (ND) findings and supporting documents. The letter states the project may have significant air quality (cumulative impact, cancer risk, operational emissions, etc.), and noise (unsupported assumptions, construction standards, equipment usage, etc.) impacts that require mitigation and an Environmental Impact Report (EIR).

In a letter dated June 23, 2025, Meridian Consultants on behalf of the applicant team responded to the issues of concern (Exhibit E). The response includes clarification of methodology, thresholds, and analysis of the ND. It includes supplemental air quality modeling and supplemental noise modeling to address commentors concerns over lack of analysis on specific environmental features. It concludes the ND does demonstrates that the project's potential environmental impacts are less than significant.

CONCLUSION

Based on the information submitted to the record, and the surrounding uses and zones, Staff recommends that the City Planning Commission approve the requested General Plan Amendment, Height District Change, Zoning Administrator Determination and Waiver of Dedication and Improvements along Drumm Avenue, and deny the Waiver of Dedication and Improvements along Coil Avenue and O Street, subject to the Conditions of Approval, in conjunction with the expansion of a cold storage facility.

CONDITIONS FOR EFFECTUATING (T) TENTATIVE CLASSIFICATION REMOVAL

Pursuant to Section 12.32 G of the Municipal Code, the (T) Tentative Classification shall be removed by the recordation of a final parcel or tract map or by posting of guarantees through the B-permit process of the City Engineer to secure the following without expense to the City of Los Angeles, with copies of any approval or guarantees provided to the Department of City Planning for attachment to the subject planning case file.

1. Dedications and Improvements. Prior to the issuance of any building permits, public improvements and dedications for streets and other rights-of-way adjoining the subject property shall be guaranteed to the satisfaction of the Bureau of Engineering, Department of Transportation, Fire Department (and other responsible City, regional, and Federal government agencies as may be necessary).

A. Responsibilities/Guarantees:

- 1) As part of early consultation, plan review, and/or project permit review, the applicant/developer shall contact the responsible agencies to ensure that any necessary dedications and improvements are specifically acknowledged by the applicant/developer.
- 2) Prior to the issuance of sign-offs for final site plan approval and/or project permits by the Department of City Planning, the applicant/developer shall provide written verification to the Department of City Planning from the responsible agency acknowledging the agency's consultation with the applicant/developer. The required dedications and improvements may necessitate redesign of the project. Any changes to the project design required by a public agency shall be documented in writing and submitted for review by the Department of City Planning.

B. Dedication Required:

- 1) **O Street** (Local Street) – A 5-foot wide strip of land along the property frontage to complete a 30 foot wide half right-of-way in accordance with Local Street standards.
- 2) **Pacific Coast Highway** (Boulevard II/State Highway) – A 5-foot wide strip of land along the property frontage to complete a 55-foot wide half right-of-way in accordance with Boulevard II standards.
- 3) **Coil Avenue** (Local Street) – A 15-foot wide strip of land along the property frontage between Colon Street and O Street and dedicate a partial elbow at the intersection with O Street. Dedicate a 15-foot by 15-foot cut corner or 20-foot radius property line return at the intersection with Pacific Coast Highway.
- 4) **Drumm Avenue** (Local Street) – ~~A 10-foot wide strip of land along the property frontage to complete a 30-foot wide half right-of-way in accordance with Local Street standards and dedicate a partial elbow at the intersection with Q Street. Dedicate a 20-foot radius property line return at the intersection with Pacific Coast Highway.~~ **None required.**

C. Improvement Required:

- 1) **O Street** – Construct a 10-foot wide concrete sidewalk and repair any broken or off-grade concrete curb and gutter. Connecting or receiving curb ramps to be constructed on the opposite end of a crosswalk (marked or unmarked) to complete the accessible route per Special Order 01-1020. Remove any landscaping within the Public Right-of-way that will obstruct the construction of the improvements. Upgrade all vaults within the Public Right-of-Way. Any utilities or obstructions that may come in conflict with improvements should be removed or relocated.
- 2) **Pacific Coast Highway** – Construct a new 5-foot wide concrete sidewalk in the dedicated area. Obtain Caltrans encroachment permit to upgrade and reconstruct the ADA curb ramps at the northwest corner intersection of Coil Ave and PCH and at the northeast corner intersection of Drumm Ave and PCH. Under Caltrans encroachment permit, construct a 2% cross slope sidewalk at existing dirt. Remove any non-standard items. Upgrade all vaults within the Public Right-of-Way. Any utilities or obstructions that may come in conflict with improvements should be removed or relocated.
- 3) **Coil Avenue** – Construct suitable surfacing to join the existing improvements to provide an 18-foot wide roadway, concrete curb, 2-foot gutter, a 12-foot sidewalk with tree wells, and a partial elbow section with O Street. Construct connecting or receiving curb ramps on the opposite end of a crosswalk (marked or unmarked) to complete the accessible route per Special Order 01- 1020. Upgrade all vaults within the Public Right-of-Way. Any utilities or obstructions that may come in conflict with improvements should be removed or relocated.
- 4) **Drumm Avenue** – **Repair and/or replace any broken, damaged, cracked, off-grade concrete curb, gutter, sidewalk and roadway pavement including any necessary removal and reconstruction of existing improvements satisfactory to the City Engineer.** ~~Construct suitable surfacing to join the existing improvements to provide a 20-foot wide half roadway, concrete curb, 2-foot gutter, a 10-foot wide concrete sidewalk with tree wells, and the partial elbow section with Q Street. Construct connecting or receiving curb ramps on the opposite end of a crosswalk (marked or unmarked) to complete the accessible route per Special Order 01-1020. Upgrade all vaults within the Public Right-of- Way. Any utilities or obstructions that may come in conflict with improvements should be removed or relocated. Remove shrubs in public right-of-way that will obstruct the construction of the improvements. Close all unused driveways and upgrade any existing driveways to comply with BOE standards.~~

Notes: Broken curb and/or gutter includes segments within existing score lines that are depressed or upraised by more than ¼ inch from the surrounding concrete work or are separated from the main body of the concrete piece by a crack through the entire vertical segment and greater than 1/8 inch at the surface of the section.

Non- ADA compliant sidewalk shall include any sidewalk that has a cross slope that exceeds 2% and/or is depressed or upraised by more than ¼ inch from the surrounding concrete work or has full concrete depth cracks that have separations greater than 1/8 inch at the surface. The sidewalk also includes that portion of the pedestrian path of travel across a driveway.

All new sidewalk curb and gutter shall conform to the Bureau of Engineering Standard Plans S410-2, S440-4, S442-5 and S444-0.

Install tree wells with root barriers and plant street trees satisfactory to the City Engineer and the Urban Forestry Division of the Bureau of Street Services. The applicant should contact the Urban Forestry Division for further information (213) 847-3077.

Street lighting improvements may be required satisfactory to the Bureau of Street Lighting (BSL). The applicant should contact BSL for further information (213) 847-1551.

The Department of Transportation (LADOT) may have additional requirements for dedication and improvements. The applicant should contact LADOT for further information regarding traffic signals, signs, and equipment at 213-485-1062.

Regarding any conflicts with any power poles, the applicant should contact the Department of Water and Power at 213-367-2715.

Regarding any conflicts with fire hydrants, the applicant should contact the Fire Department Hydrants and Access Unit at 213-482-6543.

- D. Relocate catch basins per B-Permit plan check requirements. Provide proper site and street drainages for all streets being improved. Roof drainage and surface run-off from the property shall be collected and treated at the site and drained to the streets through drain pipes constructed under the sidewalk through curb drains or connection to the catch basins.
 - E. Provide hydraulic and hydrology report and calculations and determine if additional catch basins compliant to Standard Plans S-361-0 / S-362-0 are needed on Coil Avenue, and Drumm Avenue per B-Permit plan check requirements.
 - F. Sewer lines exist in O Street, and Coil Avenue. Extension of the house connection laterals to the new property line may be required. All Sewerage Facilities Charges and Bonded Sewer Fees are to be paid prior to obtaining a building permit.
 - G. Submit parking area and driveway plan to the Harbor District Office of the Bureau of engineering and the Department of Transportation for review and approval.
- 2. Street Lighting. No street lighting requirements.
 - 3. Bureau of Sanitation. No hydraulic analysis required.
 - 4. Urban Forestry – Street Trees.
 - A. Project shall preserve all healthy mature street trees whenever possible. All feasible alternatives in project design should be considered and implemented to retain healthy mature street trees. A permit is required for the removal of any street tree and shall be replaced 2:1 as approved by the Board of Public Works and Urban Forestry Division.
 - B. Plant street trees at all feasible planting locations within dedicated streets as directed and required by the Bureau of Street Services, Urban Forestry Division. All street tree plantings shall be installed to current tree planting standards when the City has previously been paid for tree plantings. The subdivider or contractor shall notify the Urban Forestry Division at: (213) 847-3077 upon completion of construction for tree planting direction and instructions.

Note: Removal of street trees requires approval of the Board of Public Works. All projects must have environmental (CEQA) documents that appropriately address any removal and replacement of street trees. Contact Urban Forestry Division at: (213) 847-3077 for tree removal permit information.

5. Fire Department. Prior to recordation of City Planning Case/zoning action, a plot plan shall be submitted to the Fire Department for approval.

Notice: If conditions dictate, connections to the public sewer system may be postponed until adequate capacity is available.

Notice: Certificates of Occupancy for the subject property will not be issued by the City until the construction of all the public improvements (streets, sewers, storm drains, etc.) as required herein, are completed to the satisfaction of the City Engineer.

CONDITIONS OF APPROVAL

1. **Site Development.** The project shall be in substantial conformance with the plans and materials submitted by the Applicant, including the proposed building design elements and materials, stamped Exhibit "A," with a date of April 25, 2025, attached to the subject case file. No change to the plans shall be made without prior review by the Department of City Planning, Project Planning Bureau, and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the LAMC or the project conditions.
2. **Use.** Approved herein is the construction, use, and operation of a cold storage facility.
3. **Height.** The project shall be limited to a maximum height of 65 feet per Exhibit "A".
4. **Floor Area Ratio (FAR).** The project total Floor Area shall be limited to 267,960 square feet or 0.36:1 FAR per Exhibit "A".
5. **Parking per AB 2097.** The project shall be permitted to provide a minimum of zero parking space pursuant to California Government Code Section 65863.2 (AB 2097). 114 parking spaces are provided, as shown in Exhibit "A".
6. **Bicycle Parking.** Bicycle parking for additions that increase the floor area shall be provided consistent with LAMC 12.21 A.16.
7. **Lighting.** All outdoor and parking lighting shall be shielded and down-cast within the site in a manner that prevents the illumination of adjacent public rights-of-way, adjacent properties, and the night sky (unless otherwise required by the Federal Aviation Administration (FAA) or for other public safety purposes).
8. **Trucking Traffic:** No operational access to the site is provided along Drumm Avenue, only Los Angeles Fire Department emergency access as shown in Exhibit "A".
9. **Clean Up Green Up.** The project shall comply with the Clean Up Green Up Supplemental Use District requirements pursuant to Ordinance No. 184,246, including but not limited to:
 - a. A Landscape Practitioner shall select trees or hedges that are between 6 and 8 feet high, low in water use, low in biogenic emissions, high in carbon and particulate matter filtration qualities, and retain foliage for most months of the year. Trees shall be limited to selections from the Department of Public Works Bureau of Street Services, Street Tree Selection Guide, except non-drought tolerant trees and Palms shall be prohibited. A minimum of one tree shall be planted and maintained every 10 linear feet within the landscape buffer. Landscape Plans shall be submitted to the Department of City Planning for approval.
10. **Landscape Buffer.** The project shall provide an extended landscape buffer with a minimum 15-foot depth along the full length of the property's western boundary along Drumm Avenue. The existing 8-foot-tall masonry wall will be maintained and landscape buffer shall be submitted for review and approval by the Director of Planning prior to building permit sign-off.
11. **Landscape Plan.** Revised landscape plans shall be submitted to show the size and location of all plants. The landscape plan shall indicate landscape points for the Project as required by LAMC 12.40 and Landscape Ordinance Guidelines "O". All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be landscaped, including an

automatic irrigation system, and maintained in accordance with a final landscape plan prepared by a licensed landscape architect or licensed architect, and submitted for approval to the Department of City Planning. The final landscape plan shall be in substantial conformance with the submitted Landscape Plan, Exhibit "A," and shall incorporate any modifications required as a result of this grant.

12. **Soil Depths.** Shrubs, perennials, and groundcover shall require a minimum soil depth as follows:
- A minimum depth with a height ranging from 15 to 40 feet shall be 42 inches.
 - A minimum depth with a height ranging from 1 to 15 feet shall be 24 to 36 inches.
 - A minimum depth with a height of less than 1 foot shall be 18 inches.
 - A minimum depth of an extensive green roof shall be 3 inches.

Trees shall require a 42-inch minimum soil depth. Further, the minimum amount of soil volume for tree wells on the rooftop or any above grade open spaces shall be based on the size of the tree at maturity:

- 220 cubic feet for trees with a canopy diameter ranging from 15 to 19 feet.
 - 400 cubic feet for trees with a canopy diameter ranging from 20 to 24 feet.
 - 620 cubic feet for trees with a canopy diameter ranging from 25 to 29 feet.
 - 900 cubic feet for trees with a canopy diameter ranging from 30 to 34 feet.
13. **Street Trees.** Street trees shall be provided to the satisfaction of the Urban Forestry Division.
14. **Stormwater/irrigation.** The project shall implement on-site stormwater infiltration as feasible based on the site soils conditions, the geotechnical recommendations, and the City of Los Angeles Department of Building and Safety Guidelines for Storm Water Infiltration. If on-site infiltration is deemed infeasible, the project shall analyze the potential for stormwater capture and reuse for irrigation purposes based on the City Low Impact Development (LID) guidelines.
15. **Solar-ready Buildings.** The Project shall comply with the Los Angeles Municipal Green Building Code, Section 99.05.211, to the satisfaction of the Department of Building and Safety.

Administrative Conditions

16. **Final Plans.** Prior to the issuance of any building permits for the project by the Department of Building and Safety, the applicant shall submit all final construction plans that are awaiting issuance of a building permit by the Department of Building and Safety for final review and approval by the Department of City Planning. All plans that are awaiting issuance of a building permit by the Department of Building and Safety shall be stamped by Department of City Planning staff "Plans Approved". A copy of the Plans Approved, supplied by the applicant, shall be retained in the subject case file.
17. **Notations on Plans.** Plans submitted to the Department of Building and Safety, for the purpose of processing a building permit application shall include all of the Conditions of Approval herein attached as a cover sheet and shall include any modifications or notations required herein.
18. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review of approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning prior to clearance of any building permits, for placement in the subject file.

19. **Code Compliance.** Use, area, height, and yard regulations of the zone classification of the subject property shall be complied with, except where granted conditions differ herein.
20. **Department of Building and Safety.** The granting of this determination by the Director of Planning does not in any way indicate full compliance with applicable provisions of the Los Angeles Municipal Code Chapter IX (Building Code). Any corrections and/or modifications to plans made subsequent to this determination by a Department of Building and Safety Plan Check Engineer that affect any part of the exterior design or appearance of the project as approved by the Director, and which are deemed necessary by the Department of Building and Safety for Building Code compliance, shall require a referral of the revised plans back to the Department of City Planning for additional review and sign-off prior to the issuance of any permit in connection with those plans.
21. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning.
22. **Covenant.** Prior to the issuance of any permits relative to this matter, an agreement concerning all the information contained in these conditions shall be recorded in the County Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assign. The agreement must be submitted to the Department of City Planning for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Department of City Planning for attachment to the file.
23. **Indemnification and Reimbursement of Litigation Costs.**
- Applicant shall do all of the following:
- (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.
 - (ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.
 - (iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than \$50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
 - (iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
 - (v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

FINDINGS

General Plan/Charter Findings

1. **General Plan Land Use Designation.** The Project Site, 1420 North Coil Avenue, is located within the Wilmington-Harbor City Community Plan. The site is relatively flat and irregularly-shaped and is comprised of 18 lots totaling approximately 747,302 square feet. The site is designated for Light Industrial, and Heavy Industrial land uses³. The Light Industrial land use designation corresponds to the MR2, M2 and P zones, and the Heavy Industrial land use designation corresponds to the M3 and P zones. The site is zoned [Q]M3-1VL-CUGU and [Q]MR2-1VL-CUGU which is consistent with the land use designations. Height District No. 1VL limits the Floor Area Ratio ("FAR") to 1.5:1 and building height to three (3) stories and 45 feet.

As recommended, the General Plan Amendment would amend Footnote No. 10 of the Community Plan Map to allow 65 feet. The recommended Height District Change to Height District 1L would be consistent with the recommended Plan Amendment and would be in substantial conformance with the purpose, intent, and provisions of the General Plan as it is reflected within the Wilmington-Harbor City Community Plan, as further discussed in Finding Nos. 3, and 5 through 7. Furthermore, the request is consistent with the planned Community Plan Update which will allow unlimited building height.

2. **Charter Finding – City Charter Finding 555.** The General Plan may be amended in its entirety, by subject elements or parts of subject elements, or by geographic areas, provided that the part or area involved has significant social, economic, or physical identity.

The project site is located in the Wilmington-Harbor City Community Plan at the northeastern corner of the intersection of Drumm Avenue and Pacific Coast Highway. The site is relatively flat and irregularly-shaped, and is comprised of 18 lots totaling approximately 747,302 square feet (17.16 acres). The subject site is in an urbanized area surrounded primarily by industrial, manufacturing, and single-family residential uses.

The site is currently improved with an existing one-story, 42-foot tall, 221,496 square-foot cold storage facility, distribution of products and office space. The warehouse portion of the building is comprised of covered loading docks, air conditioned docks, and freezer area totaling 212,249 square-feet. There are two stories of office space, totaling 9,247 square feet. The existing office building is located on the east side of the property off Alameda Street. The existing railroad spurs are located on the northwest side of the property. The primary site entrance is at the end of Coil Street, intersecting O Street, where there is currently a guardhouse. Truck parking stalls are located all along the building perimeter. There is also truck parking along the tail end of the property, ending on Pacific Coast Highway. Car parking spaces are located all along the property line perimeter, concentrated along O Street and Alameda Street. There are two emergency fire access driveways along Drumm Avenue, however, no other vehicular access is allowed from Drumm Avenue.

³ The site is designated as Light Industrial and Heavy Industrial in the Wilmington – Harbor City Community Plan Map which was last updated in 1999. Although ZIMAS identifies the site as being within Light Manufacturing and Heavy Manufacturing, the City of Los Angeles Department of City Planning does not guarantee the accuracy or reliability of the information transmitted from this website. Therefore, the Community Plan Map land use designations shall prevail.

The General Plan Amendment, Height District Change, Zoning Administrator Determination, and Waiver of Dedication and Improvements would allow development of the site with the expansion of the cold storage facility with 267,960 square feet and a total 0.36:1 FAR, as proposed. As described in Finding Nos. 1, 3, and 5 through 7, the amendment would allow the expansion of the cold storage facility, consistent with the objectives and policies of the 1999 Community Plan.

3. **Charter Finding – City Charter Finding 556.** When approving any matter listed in Section 558, the City Planning Commission and the Council shall make findings showing that the action is in substantial conformance with the purposes, intent and provisions of the General Plan. If the Council does not adopt the City Planning Commission's findings and recommendations, the Council shall make its own findings.

The project site is in the Wilmington-Harbor City Community Plan. The site is designated for Light Industrial, and Heavy Industrial land uses. The Light Industrial land use designation corresponds to the MR2, M2 and P zones, and the Heavy Industrial land use designation corresponds to the M3 and P zones. The site is zoned [Q]M3-1VL-CUGU and [Q]MR2-1VL-CUGU which is consistent with the land use designations. Height District No. 1VL limits the Floor Area Ratio ("FAR") to 1.5:1 and building height to three (3) stories and 45 feet.

The site is subject to Footnotes Nos. 5, 10, 11, and 12 of the Community Plan. Footnote No. 5, prohibits new billboard signs within 300 feet of any lot zoned A or R. Footnote No. 10 of the Community Plan Map restricts the site height to three (3) stories and 45 feet from adjacent grade and a maximum FAR of 1.5:1. Footnote No. 11, limits height to three (3) stories and 45 feet from adjacent grade and maximum FAR of 3:1 within the Wilmington Industrial Park; which the site is not located within its boundary. Footnote No. 12, clarifies that areas proposed for MR1 and MR2 zoning classifications are specifically identified on the Plan Map, which the site is identified as MR2. The site is subject to Qualified "Q" Conditions established under Ordinance No. 177243 (Subareas 40, 50,60), which has certain limitations for open storage uses.

Furthermore, the site is subject to the provisions of LAMC Section 12.21.1.A.10 for Transitional Height. Transitional Height restricts height for portions of buildings on a C or M zoned lot when located within specified distances from the RW1 or more restrictive zone. In this instance, building portions 50 to 99 feet from the R1 zone are limited to a height of 33 feet, and building portions 100 to 199 feet from the R1 zone are limited to a height limit of 61 feet.

The project site is in the Clean Up Green Up (CUGU) Supplemental Use District. The purpose of the CUGU District is to reduce cumulative health impacts from industrial land-uses and on-road vehicle travel corridors in close proximity to sensitive uses. Furthermore, the site is located in the State Enterprise Zone (ZI File No. 2130), Transit Priority Area (ZI File No. 2452), Environmental Protection Measures for Housing Developments in proximity of oil wells (ZI File No. 2536) and is subject to the Trucking-Related Use Regulations Ordinance (ZI File No. 2514).

The applicant has requested a General Plan Amendment to amend Footnote No. 10 of the Community Plan Map, as well as a Height District Change to allow the building height of 65-feet for the expansion of the cold storage facility. As recommended, the proposed building height would be consistent with the planned Wilmington-Harbor City Community Plan Update. As described in Finding Nos. 3, and 5 through 7, the amendment would allow the development of the site with the expansion of the cold storage facility, consistent with the objectives and policies of the 1999 Community Plan.

The subject site is in an urbanized area surrounded primarily by industrial, manufacturing, and single-family residential uses. To the north and east, the subject property is directly adjacent to train tracks in the [Q]M3-1VL-CUGU and [Q]MR2-1VL-CUGU zones. Properties further north are improved with open container storage and chemical processing plant in the [Q]M3-1-CUGU zone. Properties further east across Alameda Street are zoned M3-1VL and improved with parking lot and trucking storage uses. Adjacent buildings to the southeast are improved with manufacturing and parking uses in the [Q]MR2-1VL-CUGU zone. Properties further south across O Street are zoned [Q]MR2-1VL-CUGU and developed with automotive and open storage uses. Properties to the west across Drumm Avenue and to the north of Sandison Street are improved with open storage, parking, and trucking related uses in the [Q]MR2-1VL-CUGU, MR2-1VL-CUGU and [Q]M3-1VL-CUGU zones; south of Sandison Street are single family homes in the R1-1XL-O-CUGU zone; southwest along Pacific Coast Highway are properties developed with commercial retail uses in the [Q]C1-1VL-CUGU zone.

The General Plan Amendment, Height District Change, Zoning Administrator Determination, and Waiver of Dedication and Improvements would allow the expansion of the cold storage facility with 267,960 square foot and a total 0.36:1 FAR, consistent with the objectives and policies of the 1999 Community Plan.

4. **Charter Finding – City Charter Finding 558.** The proposed Amendment to the 1999 Wilmington – Harbor City Community Plan will be in conformance with public necessity, convenience, general welfare and good zoning practice.

The recommended amendment to the 1999 Wilmington-Harbor City Community Plan would amend Footnote No. 10 which restricts the building height to 45 feet to allow a site specific building height of 65-feet. In conjunction with recommended Height District Change from 1VL to 1LD with site specific height limitation of 65-feet, the request would allow the expansion of the cold storage facility to have a building height of 65-feet.

Public Necessity, Convenience, and General Welfare

The project site is in the Wilmington-Harbor City Community Plan. The site is designated for Light Industrial, and Heavy Industrial land uses. The Light Industrial land use designation corresponds to the MR2, M2 and P zones, and the Heavy Industrial land use designation corresponds to the M3 and P zones. The site is zoned [Q]M3-1VL-CUGU and [Q]MR2-1VL-CUGU which is consistent with the land use designations. Height District No. 1VL limits the Floor Area Ratio (“FAR”) to 1.5:1 and building height to three (3) stories and 45 feet. The site is also subject to Footnote No. 10. Footnote No. 10 of the Community Plan Map restricts the site height to (three) 3 stories and 45 feet from adjacent grade and maximum FAR of 1.5:1.

The site is currently improved with an existing one-story, 42-foot tall, 221,496 square-foot cold storage facility, distribution of products and office space. The warehouse portion of the building is comprised of covered loading docks, air-conditioned docks, and freezer area totaling 212,249 square-feet. There are two stories of office space, totaling 9,247 square feet. The existing office building is located on the east side of the property off Alameda Street. The existing railroad spurs are located on the northwest side of the property. The primary site entrance is at the end of Coil Street, intersecting O Street, where there is currently a guardhouse. Truck parking stalls are located all along the building perimeter. There is also truck parking along the tail end of the property, ending on Pacific Coast Highway. Car parking spaces are located all along the property line perimeter, concentrated along O Street and Alameda Street. There are two emergency fire access driveways along Drumm Avenue, however, no other vehicular access is allowed from Drumm Avenue.

The Project proposes the improvements and expansion of the existing cold storage facility. The applicant has requested a General Plan Amendment to amend Footnote No. 10 of the Community Plan Map, as well as a Height District Change, to allow the proposed project.

The Port of Los Angeles is undergoing expansions to improve cargo flow. The receipt and storage of food products from international trade is a significant industry at the Port of Los Angeles, and is significant for the City of Los Angeles as a whole. The proposed expansion will allow new automated freezer technology to be incorporated into the site. The additional building height is needed to accommodate automated robotic arms to lift and place products more efficiently. A focus of the expansion is to allow greater onsite storage capacity. Current working storage capacities necessitates higher earlier/immediate transloading of greater volume. The automated freezer technology along with the reduction of existing railroad spurs will allow for KPAC to improve and expand its operations and contribute to the goods movement industry. The Applicant faces western regional competition, where buildings of greater height have been approved. The project site lies immediately west of an oil refining/storage facility with no building height. The applicant's request for a 65-foot building height to include a new automated freezer technology is at par with industry standards.

Good Zoning Practice

The project site is in the Wilmington-Harbor City Community Plan. The site is designated for Light Industrial, and Heavy Industrial land uses. The Light Industrial land use designation corresponds to the MR2, M2 and P zones, and the Heavy Industrial land use designation corresponds to the M3 and P zones. The site is zoned [Q]M3-1VL-CUGU and [Q]MR2-1VL-CUGU which is consistent with the land use designations. Height District No. 1VL limits the Floor Area Ratio ("FAR") to 1.5:1 and building height to three (3) stories and 45 feet.

The subject site is in an urbanized area surrounded primarily by industrial, manufacturing, and single-family residential uses. To the north and east, the subject property is directly adjacent to train tracks in the [Q]M3-1VL-CUGU and [Q]MR2-1VL-CUGU zones. Properties further north are improved with open container storage and chemical processing plant in the [Q]M3-1-CUGU zone. Properties further east across Alameda Street are zoned M3-1VL and improved with parking lot and trucking storage uses. Adjacent buildings to the southeast are improved with manufacturing and parking uses in the [Q]MR2-1VL-CUGU zone. Properties further south across O Street are zoned [Q]MR2-1VL-CUGU and developed with automotive and open storage uses. Properties to the west across Drumm Avenue and to the north of Sandison Street are improved with open storage, parking, and trucking related uses in the [Q]MR2-1VL-CUGU, MR2-1VL-CUGU and [Q]M3-1VL-CUGU zones; south of Sandison Street are single family homes in the R1-1XL-O-CUGU zone; southwest along Pacific Coast Highway are properties developed with commercial retail uses in the [Q]C1-1VL-CUGU zone.

The subject site is within a Transit Priority Area and is located in close proximity to the intersection of Pacific Coast Highway and Watson Avenue which is served by several bus stops including the Los Angeles Department of Transportation Wilmington bus line and Torrance Transit 3 and R3 bus lines, which qualifies as a Major Transit Stop.

The site is zoned [Q]M3-1VL-CUGU and [Q]MR2-1VL-CUGU which is consistent with the land use designations. Height District No. 1VL limits the Floor Area Ratio ("FAR") to 1.5:1 and building height to 45 feet and (3) stories. The site is also subject to Footnote No. 10. Footnote No. 10 of the Community Plan Map restricts the site height to three (3) stories and 45 feet from adjacent grade and maximum FAR of 1.5:1. The ability to expand the use on the existing site is limited because of the existing height restrictions. The additional building height is needed to accommodate recent automated racking freezer technology. The automated

system uses computer-controlled, robotic arms to lift and place products more efficiently. The system needs additional space to lift materials to the top of the stack.

The General Plan Amendment, Height District Change, and Zoning Administrator Determination would allow the building height of 65-feet for the expansion of the cold storage facility. As further discussed in Findings Nos. 1 and 5 through 7, the amendment of the Footnote and Height District would be consistent with the purpose, intent, and provisions of the General Plan.

5. **General Plan Text.** The 1999 Wilmington-Harbor City Community Plan text includes the following relevant objectives, policies, and programs:

- Goal 3: Provide Sufficient land for a variety of industrial uses with maximum employment opportunities which are safe for the environment and the work force, and which have minimal adverse impact on adjacent residential uses.*
- Objective 3-1: To provide locations for future industrial development and employment which are consistent to transportation facilities and compatible with surrounding use.*
- Policy 3-1.1: Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.*
- Policy 3-1.3: Require a transition of industrial uses, from intensive uses to less intensive uses, in those areas in proximity to residential neighborhoods.*
- Objective 3-2: To retain industrial lands for industrial use to maintain and expand the industrial employment base for the community residents.*
- Policy 3-2.1: Protect areas designated for Industry and proposed for the MR restricted zoning classifications on the Plan Map from unrelated commercial and other non-industrial uses, and upgrade such areas with high quality industrial development that is compatible with adjacent land use.*
- Policy 3-2.2: Large industrially planned parcels located in predominantly industrial area should be protected from development by other uses which do not support the industrial base of the City and community.*
- Objective 3-3: To improve the aesthetic quality and design of industrial areas, eliminate blight and detrimental visual impact on residential areas, and establish a stable environmental for quality industrial development.*
- Policy 3-3.1: Require urban design techniques, such as appropriate building orientation and scale landscaping, buffering and increased setbacks in the development of new industrial properties to improve land use compatibility with adjacent uses and to enhance the physical environment.*

The expansion of the cold storage facility and the request for additional height is consistent with the above-referenced objective and policies as it will accommodate the retention and expansion of existing industrial uses. The project will be subject to CUGU Supplemental Use

District requirements for site planning, trash enclosures, fencing, lighting, and mechanical equipment, to improve compatibility with adjacent uses and enhance the physical environment.

The recommended amendment to the 1999 Wilmington-Harbor City Community Plan would amend Footnote No. 10 of the Community Plan Map which restricts the building height to 45 feet to allow a site specific building height of 65-feet. In conjunction with recommended Height District Change from 1VL to 1L with site specific height limitation of 65-feet, would allow the expansion of the cold storage facility to have a building height of 65-feet. The additional building height is needed to accommodate recent automated racking freezer technology. The automated system uses computer-controlled, robotic arms to lift and place products more efficiently. The system needs to lift materials to the top of the stack. Furthermore, as recommended the updates also align with the planned Wilmington-Harbor City Community Plan Update, which would identify the site as Limited Industrial with an unlimited building height.

As recommended, the General Plan Amendment and Height District Change would be consistent with the above referenced objectives, policies, and programs of the 1999 Wilmington-Harbor City Community Plan.

6. **Framework Element.** The Framework Element for the General Plan (Framework Element) was adopted by the City of Los Angeles in December 1996 and re-adopted in August 2001. The Framework Element provides guidance regarding policy issues for the entire City of Los Angeles, including the project site. The Framework Element also sets forth a Citywide comprehensive long-range growth strategy and defines Citywide policies regarding such issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services. The Framework Element includes the following provisions, objectives and policies relevant to the instant request:

Goal 3J: Industrial growth that provides job opportunities for the City's residents and maintains the City's fiscal viability.

Objective 3.14: Provide land and supporting services for the retention and attraction of new industries.

Policy 3.1.4: Accommodate new development of industrial uses in areas designated as "Industrial-Light," "Industrial-Heavy," "Industrial-Transit" in accordance with Tables 3-1 and 3-9. The range and intensities of uses permitted in any area shall be determined by the community plans.

As stated in the General Plan Framework, lands designated for industrial use by the Community Plans continue to be designated for these purposes to support economic development and jobs generation. The project site is in the Wilmington-Harbor City Community Plan. The site is designated for Light Industrial, , and Heavy Industrial land uses. The site is zoned [Q]M3-1VL-CUGU and [Q]MR2-1VL-CUGU which is consistent with the land use designations. Height Districts No. 1VL limits the Floor Area Ratio ("FAR") to 1.5:1 and building height to 45 feet and (3) stories.

The applicant has requested a General Plan Amendment to amend Footnote No. 10 of the Community Plan Map to allow 65 feet, a Height District Change to allow Height District 1L, and a Zoning Administrator Determination to allow transitional height of 65 feet within 100 to 199 feet of the R1 Zone, to allow the proposed project. The proposed General Plan Amendment, Height District Change, and Zoning Administrator Determination would allow a

building height of 65-feet for the expansion of the cold storage facility. The additional building height is needed to accommodate recent automated racking freezer technology. The automated system uses computer-controlled, robotic arms to lift and place products more efficiently. The system needs additional space to lift materials to the top of the stack. The improvements and expansion of the cold storage facility are consistent with the above referenced goals, objectives and policies of the General Plan Framework.

7. Mobility Element. The Mobility Element of the General Plan is not likely to be affected by the recommended action herein. The proposed project, with the requested General Plan Amendment and Height District Change, proposes the improvement and expansion of an existing one-story, 42-foot tall, 221,496 square-foot cold storage facility, resulting in a two-story, 65-foot tall, 267,960 square feet facility, with a total 0.36:1 FAR.

The irregular shape site abuts multiple streets. The property is bounded by Drumm Avenue on the west, and Pacific Coast Highway, Coil Avenue O Street, and Alameda Street along the south and southeast side of the property.

Abutting the property to the West, is Drumm Avenue which is designated by the Mobility Plan as a Local Street Standard, with a designated right-of-way width of 60 feet and roadway width of 36 feet, and is currently dedicated to right-of-way width of 40 feet and approximately 33 foot roadway width, with a curb and gutter. The west side of the street also has a sidewalk.

Abutting the property to the southeast is Coil Avenue, which is designated by the Mobility Plan as a Local Street Standard. Coil Avenue designated right-of-way width of 60 feet and roadway width of 36 feet, and is currently dedicated to a varying right-of-way width ranging from of 34 to 74 feet and approximately 25 to 60 foot roadway width, with a curb and gutter. Sidewalks are provided only on some sections of the street.

O Street is abutting the property to south and is designated by the Mobility Plan as a Local Street Standard, with a designated right-of-way width of 60 feet and roadway width of 36 feet, and is currently dedicated to right-of-way width of 49 feet and approximately 39 foot roadway width, with a curb, gutter, and sidewalk.

Pacific Coast Highway is abutting the property to the south, and is designated by the Mobility Plan as Boulevard II, with a designated right-of-way width of 110 feet and roadway width of 80 feet and is currently dedicated to right-of-way width of 100 feet and approximately 82-foot roadway width, with a curb and sidewalk.

Abutting the property to the east is Alameda Street, and is designated by the Mobility Plan as a Local Street Standard, with a designated right-of-way width of 60 feet and roadway width of 36 feet, and is currently dedicated to right-of-way width of 40 feet and approximately 33 foot roadway width, with a curb, and gutter. The west side of the right-of-way also has a sidewalk.

The applicant has requested a Waiver of Dedication and Improvements for a 15-foot dedication and all improvements along Coil Avenue, and from a 10-foot dedication and all improvements requirements along Drumm Avenue. The project will be required to dedicate and improve the public right-of-way to the satisfaction of the Bureau of Engineering for all streets where a request was not submitted or not approved. In addition to providing dedications to meet the established Street Standards, the project is also consistent with the following policies of the Mobility Element:

Policy 1.8: Goods Movement Safety: Ensure that the goods movement sector is integrated with the rest of the transportation system in such a way that does not endanger the health and safety of residents and other roadway users.

- Policy 2.8: Goods Movement: Implement projects that would provide regionally significant transportation improvements for goods movements.
- Policy 3.1: Access for All: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes - including goods movement – as integral components of the City's transportation system.
- Policy 4.12: Goods Movement: Increase public awareness about the importance and economic value of goods movements in the Los Angeles region.

Furthermore, the subject site is within a Transit Priority Area and is located in close proximity to several bus stops served by the Los Angeles Department of Transportation Wilmington route and Torrance Transit 3, R3 bus lines, which qualifies as a Major Transit Stop.

Entitlement Findings

7. Height District Change Findings.

- a. **Pursuant to Section 12.32-C of the Municipal Code, and based on these findings, the recommended action is deemed consistent with public necessity, convenience, general welfare and good zoning practice.**

As provided under Finding No. 1, the project is consistent with public necessity, convenience, and general welfare as the project will improve and expand an existing cold storage facility within an industrial zoned lot. The project is consistent with good zoning practice as it is consistent with the existing land use designation.

- b. **Pursuant to Section 12.32-G. of the Municipal Code "T" Classification Findings.**

The current action, as recommended, has been made contingent upon compliance with new "T" conditions of approval imposed herein for the proposed project. As recommended, the Height District Change has been placed in temporary "T" Classification in order to ensure consistency with the amendment to Footnote No. 10 of the Community Plan Map to allow a 65-foot height limit. The "T" Conditions are necessary to ensure the identified dedications, improvements, and actions are undertaken to meet the public's needs, convenience, and general welfare served by the actions required. These actions and improvements will provide the necessary infrastructure to serve the surrounding community at this site.

8. Zoning Administrator Determination Findings.

- c. **The project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city, or region.**

The project site is located in the Wilmington-Harbor City Community Plan at the northeastern corner of the intersection of Drumm Avenue and Pacific Coast Highway. The site is relatively flat, irregularly-shaped, and is comprised of 18 lots totaling approximately 747,302 square feet (17.16 acres). The property is bounded by Drumm Avenue on the west, and Pacific Coast Highway, Coil Avenue, O Street, and Alameda Street along the south and southeast side of the property. The site has approximately 1,994 feet of frontage

along Drumm Avenue, 90 feet along Pacific Coast Highway, 751 feet along Coil Avenue, 636 feet along O Street, and 70 feet along Alameda Street.

The site is currently improved with an existing one-story, 42-foot tall, 221,496 square-foot cold storage facility, distribution of products and office space. The warehouse portion of the building is comprised of covered loading docks, air-conditioned docks, and freezer area totaling 212,249 square-feet. There are two stories of office space, totaling 9,247 square feet. The existing office building is located on the east side of the property off Alameda Street. The existing railroad spurs are located on the northwest side of the property. The primary site entrance is at the end of Coil Street, intersecting O Street, where there is currently a guardhouse. Truck parking stalls are located all along the building perimeter. There is also truck parking along the tail end of the property, ending on Pacific Coast Highway. Car parking spaces are located all along the property line perimeter, concentrated along O Street and Alameda Street. There are two emergency fire access driveways along Drumm Avenue, however, no other vehicular access is allowed from Drumm Avenue.

The proposed project will result in a two-story, 65-foot tall, 267,960 square-foot facility, with a total FAR of 0.36:1. The number of trains unloading stations will decrease from 18 to 6 stations. The project proposes a total of 114 parking spaces. KPAC intends to maintain their operations of two 8-hour shifts Monday to Friday and one 8 hour shift on Saturdays. The project proposes grading of less than 500 cubic yards of soil and import of 7,000 cubic yards of soil. The tree disclosure statement, signed by Rick Burke dated August 29, 2022, and tree letter dated August 26, 2022, stated that there are no street trees located on the public right-of-way abutting the project site. No (0) protected trees will be removed from the subject site, and no (0) street trees will be removed from the adjacent public right-of-way.

The applicant has requested a Zoning Administrator Determination to allow Transitional Height of 65 feet within the distance of 100 to 199 feet from the R1 Zone, in lieu of the maximum 61 feet otherwise required. Neighboring properties to the west are single-family dwelling units and zoned R1. The additional building height is needed to accommodate recent automated racking freezer technology. The automated system uses computer-controlled, robotic arms to lift and place products more efficiently. The system needs additional space to lift materials to the top of the stack. A focus of the expansion is to allow greater onsite storage capacity. Current working storage capacities necessitates higher earlier/immediate transloading of greater volume. The Applicant faces western regional competition, where buildings of greater height have been approved. The project site lies immediately west of an oil refining/storage facility with no building height. The applicant's requests for building height to include a new automated freezer technology is at par with industry standards. The automated freezer technology along with the reduction of existing railroad spurs will allow for KPAC to improve and expand it's operations and contribute to the goods movement industry. The Port of Los Angeles is undergoing expansions to improve cargo flow. The receipt and storage of food products from international trade is a significant industry at the Port of Los Angeles, and is significant for the City of Los Angeles as a whole. The expansion of the cold storage facility will provide a service that is essential and beneficial to the community, city and region.

- d. **The project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.**

The proposed scope of work involves the improvement and expansion of the cold storage facility. Specifically, the scope of work includes the demolition of an existing 27,157 square

foot cold dock located along the west side of the building closer to Drumm Avenue. The existing cold dock will be replaced with a new 71,331 square-foot freezer, resulting in a new addition of 44,174 square feet of new floor area. The improvements include 2,290 square feet of new engine/mechanical room, electrical room, and fire pump located along the south side along O Street. The project also involves the improvement of a new automated racking system, as well as other interior improvements.

The proposed project will result in a two-story, 65-foot tall, 267,960 square-foot facility, with a total FAR of 0.36:1. The number of trains unloading stations will decrease from 18 to 6 stations. The project proposes a total of 114 parking spaces. KPAC intends to maintain their operations of two 8-hour shifts Monday to Friday and one 8 hour shift on Saturdays. The project proposes grading of less than 500 cubic yards of soil and import of 7,000 cubic yards of soil. The tree disclosure statement, signed by Rick Burke dated August 29, 2022, and tree letter dated August 26, 2022, stated that there are no street trees located on the public right-of-way abutting the project site. No (0) protected trees will be removed from the subject site, and no (0) street trees will be removed from the adjacent public right-of-way.

The subject site is in an urbanized area surrounded primarily by industrial, manufacturing, and single-family residential uses. To the north and east, the subject property is directly adjacent to train tracks in the [Q]M3-1VL-CUGU and [Q]MR2-1VL-CUGU zones. Properties further north are improved with open container storage and chemical processing plant in the [Q]M3-1-CUGU zone. Properties further east across Alameda Street are zoned M3-1VL and improved with parking lot and trucking storage uses. Adjacent buildings to the southeast are improved with manufacturing and parking uses in the [Q]MR2-1VL-CUGU zone. Properties further south across O Street are zoned [Q]MR2-1VL-CUGU and developed with automotive and open storage uses. Properties to the west across Drumm Avenue and to the north of Sandison Street are improved with open storage, parking, and trucking related uses in the [Q]MR2-1VL-CUGU, MR2-1VL-CUGU and [Q]M3-1VL-CUGU zones; south of Sandison Street are single family homes in the R1-1XL-O-CUGU zone; southwest along Pacific Coast Highway are properties developed with commercial retail uses in the [Q]C1-1VL-CUGU zone.

The subject site is within a Transit Priority Area and is located in close proximity to the intersection of Pacific Coast Highway and Watson Avenue which is served by several bus stops including the Los Angeles Department of Transportation Wilmington bus line and Torrance Transit 3 and R3 bus lines, which qualifies as a Major Transit Stop.

The site is currently improved with an existing one-story, 42-foot tall, 221,496 square-foot cold storage facility, distribution of products and office space. The warehouse portion of the building is comprised of covered loading docks, conditioned docks, and freezer area totaling 212,249 square-feet. There are two stories of office space, totaling 9,247 square feet. The existing office building is located on the east side of the property off Alameda Street. The existing railroad spurs are located on the northwest side of the property. The primary site entrance is at the end of Coil Street, intersecting O Street, where there is currently a guardhouse. Truck parking stalls are located all along the building perimeter. There is also truck parking along the tail end of the property, ending on Pacific Coast Highway. Car parking spaces are located all along the property line perimeter, concentrated along O Street and Alameda Street. There are two emergency fire access driveways along Drumm Avenue, however, no other vehicular access is allowed from Drumm Avenue.

The building is proposed with a stepback to comply with the transitional height requirements from 0 to 99 feet from the lot line of the R1 zone. Building portions 100 to 199 feet from the lot line of R1 zone is limited to a height limit of 61 feet. The applicant seeks deviation to allow a building height of 65 feet in lieu of the 61 feet allowance. The proposed building height of 65-feet for the expansion of the cold storage facility. The additional building height is needed to accommodate recent automated racking freezer technology. The automated system uses computer-controlled, robotic arms to lift and place products more efficiently. The system needs additional space to lift materials to the top of the stack.

The project will also be subject to CUGU Supplemental Use District requirements for site planning, trash enclosures, fencing, lighting, and mechanical equipment, to improve compatibility with adjacent uses and enhance the physical environment. The site is also subject to Qualified "Q" Conditions established under Ordinance No. 177243 which has certain requirements for open storage uses. The site will provide an extended landscape buffer with a minimum 15-foot depth along the full length of the property's western boundary along Drumm Avenue, to provide a transition to the single-family residential neighborhood to the west.

Therefore, as described above, the project's size, height, operations, amenities, and features will enhance the surrounding neighborhood rather than further degrade or adversely affect other properties.

- e. **The project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any specific plan.**

As provided under Finding Nos. 1, 3, 5 through 7, and 11a, the project is in substantial conformance with the Framework Element, Community Plan, and Mobility Element.

- f. **The project provides for an arrangement of uses, buildings, structures, open spaces and other improvements that are compatible with the scale and character of the adjacent properties and surrounding neighborhood.**

The site is currently improved with an existing one-story, 42-foot tall, 221,496 square-foot cold storage facility, distribution of products and office space. The warehouse portion of the building is comprised of covered loading docks, air-conditioned docks, and freezer area totaling 212,249 square-feet. There are two stories of office space, totaling 9,247 square feet. The existing office building is located on the east side of the property off Alameda Street. The existing railroad spurs are located on the northwest side of the property. The primary site entrance is at the end of Coil Street, intersecting O Street, where there is currently a guardhouse. Truck parking stalls are located all along the building perimeter. There is also truck parking along the tail end of the property, ending on Pacific Coast Highway. Car parking spaces are located all along the property line perimeter, concentrated along O Street and Alameda Street. There are two emergency fire access driveways along Drumm Avenue, however, no other vehicular access is allowed from Drumm Avenue.

The proposed scope of work involves the improvement and expansion of the cold storage facility. Specifically, the scope of work includes the demolition of an existing 27,157 square foot cold dock located along the west side of the building closer to Drumm Avenue. The existing cold dock will be replaced with a new 71,331 square-foot freezer, resulting in a new addition of 44,174 square feet of new floor area. The improvements include 2,290 square feet of new engine/mechanical room, electrical room, and fire pump located along

the south side along O Street. The project also involves the improvement of a new automated racking system, as well as other interior improvements.

The proposed project will result in a two-story, 65-foot tall, 267,960 square-foot facility, with a total FAR of 0.36:1. The number of trains unloading stations will decrease from 18 to 6 stations. The project proposes a total of 114 parking spaces. KPAC intends to maintain their operations of two 8-hour shifts Monday to Friday and one 8 hour shift on Saturdays. The project proposes grading of less than 500 cubic yards of soil and import of 7,000 cubic yards of soil. The tree disclosure statement, signed by Rick Burke dated August 29, 2022, and tree letter dated August 26, 2022, stated that there are no street trees located on the public right-of-way abutting the project site. No (0) protected trees will be removed from the subject site, and no (0) street trees will be removed from the adjacent public right-of-way.

The subject site is in an urbanized area surrounded primarily by industrial, manufacturing, and single-family residential uses. To the north and east, the subject property is directly adjacent to train tracks in the [Q]M3-1VL-CUGU and [Q]MR2-1VL-CUGU zones. Properties further north are improved with open container storage and chemical processing plant in the [Q]M3-1-CUGU zone. Properties further east across Alameda Street are zoned M3-1VL and improved with parking lot and trucking storage uses. Adjacent buildings to the southeast are improved with manufacturing and parking uses in the [Q]MR2-1VL-CUGU zone. Properties further south across O Street are zoned [Q]MR2-1VL-CUGU and developed with automotive and open storage uses. Properties to the west across Drumm Avenue and to the north of Sandison Street are improved with open storage, parking, and trucking related uses in the [Q]MR2-1VL-CUGU, MR2-1VL-CUGU and [Q]M3-1VL-CUGU zones; south of Sandison Street are single family homes in the R1-1XL-O-CUGU zone; southwest along Pacific Coast Highway are properties developed with commercial retail uses in the [Q]C1-1VL-CUGU zone.

The proposed height is consistent with the Community Plan Update which will allow unlimited building height. Although the proposed height currently exceeds the general height of buildings in the surrounding vicinity, the building will not be directly overlooking residential neighbors. The project site is located across the street from the residential area. There is an existing 8-foot high masonry wall along Drumm Avenue which will be maintained. A proposed improvement includes the addition of a 15-foot depth landscape buffer all along the Drumm Avenue property line. The expansion is affecting a portion of the building. From the building addition only approximately 313 feet of building frontage is subject to the transitional height limitations. Furthermore, the project site lies immediately west of an oil refining/storage facility with no building height. The additional building height is needed to accommodate recent automated racking freezer technology. The automated system uses computer-controlled, robotic arms to lift and place products more efficiently. The system needs additional space to lift materials to the top of the stack.

As such, the project's significant features will continue to be compatible with the scale and character of the adjacent properties and surrounding neighborhood.

WAIVER OF DEDICATION AND IMPROVEMENT FINDINGS

Pursuant to LAMC Section 12.37, the City Planning Commission may waive, reduce, or modify the required dedication(s) or improvement(s) as appropriate after making any of the following findings, based on substantial evidence in the record that:

- i) the dedication or improvement requirement does not bear a reasonable relationship to any project impact;
- ii) the dedication or improvement is not necessary to meet the City's mobility needs for the next 20 years based on the guidelines the Street Standards Committee has established; or
- iii) the dedication or improvement requirement is physically impractical.

On March 1, 2023, Bureau of Engineering issued Interdepartmental Correspondence requiring the following dedications and improvements:

Dedication Required:

- **Pacific Coast Highway** (Boulevard II/State Highway) – A 5-foot wide strip of land along the property frontage to complete a 55-foot wide half right-of-way in accordance with Boulevard II standards.
- **Coil Avenue** (Local Street) – A 15-foot wide strip of land along the property frontage between Colon Street and O Street and dedicate a partial elbow at the intersection with O Street. Dedicate a 15-foot by 15-foot cut corner or 20-foot radius property line return at the intersection with Pacific Coast Highway.
- **O Street** (Local Street) – A 5-foot wide strip of land along the property frontage to complete a 30 foot wide half right-of-way in accordance with Local Street standards.
- **Drumm Avenue** (Local Street) – A 10-foot wide strip of land along the property frontage to complete a 30-foot wide half right-of-way in accordance with Local Street standards and dedicate a partial elbow at the intersection with Q Street. Dedicate a 20-foot radius property line return at the intersection with Pacific Coast Highway.

Improvements Required:

- **Pacific Coast Highway** – Construct a new 5-foot wide concrete sidewalk in the dedicated area. Obtain Caltrans encroachment permit to upgrade and reconstruct the ADA curb ramps at the northwest corner intersection of Coil Ave and PCH and at the northeast corner intersection of Drumm Ave and PCH. Under Caltrans encroachment permit, construct a 2% cross slope sidewalk at existing dirt. Remove any non-standard items. Upgrade all vaults within the Public Right-of-Way. Any utilities or obstructions that may come in conflict with improvements should be removed or relocated.
- **Coil Avenue** – Construct suitable surfacing to join the existing improvements to provide an 18-foot wide roadway, concrete curb, 2-foot gutter, a 12-foot sidewalk with tree wells, and a partial elbow section with O Street. Construct connecting or receiving curb ramps on the opposite end of a crosswalk (marked or unmarked) to complete the accessible route per Special Order 01- 1020. Upgrade all vaults within the Public Right-of-Way. Any utilities or obstructions that may come in conflict with improvements should be removed or relocated.
- **Street** – Construct a 10-foot wide concrete sidewalk and repair any broken or off-grade concrete curb and gutter. Connecting or receiving curb ramps to be constructed on the opposite end of a crosswalk (marked or unmarked) to complete the accessible route per Special Order 01-1020. Remove any landscaping within the Public Right-of-way that will obstruct the construction of the improvements. Upgrade all vaults within the Public Right-of-Way. Any utilities or obstructions that may come in conflict with improvements should be removed or relocated.
- **Drumm Avenue** – Construct suitable surfacing to join the existing improvements to provide a 20-foot wide half roadway, concrete curb, 2-foot gutter, a 10-foot wide concrete sidewalk with tree wells, and the partial elbow section with Q Street. Construct connecting or receiving curb ramps on the opposite end of a crosswalk (marked or unmarked) to complete the accessible route per Special Order 01-1020. Upgrade all vaults within the

Public Right-of-Way. Any utilities or obstructions that may come in conflict with improvements should be removed or relocated. Remove shrubs in public right-of-way that will obstruct the construction of the improvements. Close all unused driveways and upgrade any existing driveways to comply with BOE standards.

The applicant has requested a Waiver of Dedication and Improvements for all the dedication and improvements along Coil Avenue, and Drumm Avenue. The applicant has not requested to deviate from the requirements for Pacific Coast Highway or "O" Street; therefore, the project will be required to dedicate and improve the public right-of-way to the satisfaction of the Bureau of Engineering for all streets where a request was not submitted or not approved.

The Zoning Administrator finds, based on substantial evidence in the record that:

Drumm Avenue – Waiver of Dedication and Improvements is GRANTED:

1. The dedication or improvement requirement DOES NOT bear a reasonable relationship to any project impact.

The project site is located in the Wilmington-Harbor City Community Plan at the northeastern corner of the intersection of Drumm Avenue and Pacific Coast Highway. The site is relatively flat, irregularly-shaped, and is comprised of 18 lots totaling approximately 747,302 square feet (17.16 acres). The property is bounded by Drumm Avenue on the west, and Pacific Coast Highway, Coil Avenue, O Street, and Alameda Street along the south and southeast side of the property. The site has approximately 1,994 feet of frontage along Drumm Avenue, 90 feet along Pacific Coast Highway, 751 feet along Coil Avenue, 636 feet along O Street, and 70 feet along Alameda Street.

The site is currently improved with an existing one-story, 42-foot tall, 221,496 square-foot cold storage facility, distribution of products and office space. The warehouse portion of the building is comprised of covered loading docks, air-conditioned docks, and freezer area totaling 212,249 square-feet. There are two stories of office space, totaling 9,247 square feet. The existing office building is located on the east side of the property off Alameda Street. The existing railroad spurs are located on the northwest side of the property. The primary site entrance is at the end of Coil Street, intersecting O Street, where there is currently a guardhouse. Truck parking stalls are located all along the building perimeter. There is also truck parking along the tail end of the property, ending on Pacific Coast Highway. Car parking spaces are located all along the property line perimeter, concentrated along O Street and Alameda Street. There are two emergency fire access driveways along Drumm Avenue, however, no other vehicular access is allowed from Drumm Avenue.

The applicant requests to waive all the dedication and improvements from Drumm Avenue. The site has approximately 1,994 feet of frontage along Drumm Avenue. The dedications and improvements required by BOE do not bear any relationship to project impacts, as there are no physical improvements or vehicular access points along Drumm Avenue. There are only two LAFD emergency fire access driveways along Drumm Avenue. The project will maintain an existing 8-foot-tall masonry wall. In addition, a 15-foot-deep landscape setback containing trees spaced 10 feet apart will be provided along the full length of the property's western boundary along Drumm Avenue.

The proposed scope of work is the improvement and expansion of an existing cold storage facility that will not result in new impacts along Drumm Avenue. Furthermore, providing a 10-foot street dedication along Drumm would result in a domino effect that would require the mandated CUGU landscape setback be pushed back, which would cause the existing

8-foot-tall masonry wall to be demolished and moved back, and for the 27-foot fire lane between the property line and the new addition to be pushed and the addition to be reduced by 10 feet. There is also an existing petroleum underground pipeline covered with aggregate surface within an easement that extends full length, south to north, of the subject property along Drumm Avenue. Any street dedication would place the pipeline within the street's public right of way and, if improved, beneath the roadway of the street.

While the dedication and improvements required by BOE for Drumm Avenue are intended to meet the City Street Standards plans, they could serve to widen the roadway which could intensify other truck traffic on the street. The operations of the applicant, both existing and proposed, are unrelated to the truck traffic issue on Drumm Avenue, since the applicant has no access to Drumm Avenue. In addition, the project has been conditioned to limit Drumm Avenue for LAFD emergency access only.

Coil Avenue – Waiver of Dedication and Improvements is DENIED:

1. The dedication or improvement requirement DOES bear a reasonable relationship to any project impact.

The site is currently improved with an existing one-story, 42-foot tall, 221,496 square-foot cold storage facility, distribution of products and office space. The warehouse portion of the building is comprised of covered loading docks, air-conditioned docks, and freezer area totaling 212,249 square-feet. There are two stories of office space, totaling 9,247 square feet. The existing office building is located on the east side of the property off Alameda Street. The existing railroad spurs are located on the northwest side of the property. The primary site entrance is at the end of Coil Street, intersecting O Street, where there is currently a guardhouse. Truck parking stalls are located all along the building perimeter. There is also truck parking along the tail end of the property, ending on Pacific Coast Highway. Car parking spaces are located all along the property line perimeter, concentrated along O Street and Alameda Street. There are two emergency fire access driveways along Drumm Avenue, however, no other vehicular access is allowed from Drumm Avenue.

The proposed scope of work involves the improvement and expansion of the cold storage facility. Specifically, the scope of work includes the demolition of an existing 27,157 square foot cold dock located along the west side of the building closer to Drumm Avenue. The existing cold dock will be replaced with a new 71,331 square-foot freezer, resulting in a new addition of 44,174 square feet of new floor area. The improvements include 2,290 square feet of new engine/mechanical room, electrical room, and fire pump located along the south side along O Street. The project also involves the improvement of a new automated racking system, as well as other interior improvements.

The proposed project will result in a two-story, 65-foot tall, 267,960 square-foot facility, with a total FAR of 0.36:1. The number of trains unloading stations will decrease from 18 to 6 stations. The project proposes a total of 114 parking spaces. KPAC intends to maintain their operations of two 8-hour shifts Monday to Friday and one 8 hour shift on Saturdays. The project proposes grading of less than 500 cubic yards of soil and import of 7,000 cubic yards of soil. The tree disclosure statement, signed by Rick Burke dated August 29, 2022, and tree letter dated August 26, 2022, stated that there are no street trees located on the public right-of-way abutting the project site. No (0) protected trees will be removed from the subject site, and no (0) street trees will be removed from the adjacent public right-of-way.

Abutting the property to the southeast, is designated by the Mobility Plan as a Local Street Standard, with a designated right-of-way width of 60 feet and roadway width of 36 feet, and is currently dedicated to a varying right-of-way width ranging from 30 to 74 feet and approximately 25 to 60 foot roadway width, with a curb and gutter. Sidewalks are provided only on some sections of the street.

The applicant requests to waive all the dedication and improvements from Coil Avenue. The site has approximately 751 feet of frontage along Coil Avenue. The applicant contends that the dedications and improvements required by BOE do not bear any relationship to the project impacts. However, considering Coil Avenue serves as the primary vehicular and pedestrian pathway to the site, BOE's requested dedications and improvements are reasonably related to the proposed project.

The above requirements are imposed by BOE to ensure adequate right of ways improvements to meet street standards for stormwater flow and to facilitate mobility and circulation per the goals and policies of the Mobility Plan. As mentioned, Coil Avenue has a varying roadway width at its narrowest point being approximately 25 feet, which serves as a pinch point. The expansion of a cold storage facility could increase capacity and traffic for the transportation of goods via trucks. Widening of Coil Street can help improve the circulation of trucks and vehicles that travel along Coil Street north of Pacific Coast Highway to the subject site and the other industrial business around the subject site. Therefore, the required dedication and improvements do bear a reasonable relationship to the project impact.

2. The dedication or improvement IS necessary to meet the City's mobility needs for the next 20 years based on guidelines the Street Standards Committee has established.

The Mobility Plan 2035 ("Mobility Plan") was adopted by City Council as an Element of the General Plan and last amended in September 2016. The purpose of the Mobility Plan is to "present a guide to the further development of a citywide transportation system which provides for the efficient movement of people and goods". Among the key policy initiatives of the Mobility Plan is to "lay the foundation for a network of complete streets and establish new complete street standards that will provide safe and efficient transportation for pedestrians". The Mobility Plan contains the following policies.

The Mobility Plan 2035:

Policy 1.1: Roadway User Vulnerability: Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user.

Policy 1.2: Complete Streets: Implement a balanced transportation system on all streets, tunnels, and bridges using complete streets principles to ensure the safety and mobility of all users.

Policy 1.7: Regularly Maintained Streets: Enhance roadway safety by maintaining the street, alley, tunnel, and bridge system in good to excellent condition.

Policy 2.3: Pedestrian Infrastructure: Recognize walking as a component of every trip and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

Policy 2.8: Implement projects that would provide regionally significant transportation improvements for goods movement.

Policy 3.1: Access for All: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes - including goods movement - as integral components of the City's transportation system.

Policy 3.2: People with Disabilities: Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.

The Mobility Plan is also administered by LAMC Section 12.37 (Highway and Collector Street Dedication and Improvement,) which requires the widening and improvement of streets to meet current street standards. Dedication and improvement requirements are administered by the Bureau of Engineering (BOE), with the consideration of waivers and appeals of those requirements by the Department of City Planning per LAMC Section 12.37-1.

The Mobility Plan designates Coil Avenue as a Local Street Standard, with designated right-of-way width of 60 feet and roadway width of 36 feet. Per S-470-1 street standard plans, this Local Street classification requires an 18-foot half-roadway. As stated above, BOE's Interdepartmental Correspondence dated March 1, 2023 requires dedication of 15-feet along Coil Avenue, for a 3-foot widening of the roadway and new 12-foot sidewalk and related improvements.

These are intended to ensure adequate street widths to meet street standards, facilitate mobility and circulation per the goals and policies of the Mobility Plan, and improve the existing street and better facilitate pedestrian activity. As stated above, the dedications and improvements would enhance safety, visibility, and overall circulation at the intersection, and better connect the configuration and improvements on the east side of Coil Avenue between Colon Street and O Street.

The site has 751-feet of frontage along Coil Avenue. The primary site entrance is at the end of Coil Street, intersecting O Street, where there is currently a guardhouse. As mentioned, Coil Avenue has a varying roadway width at its narrowest point being approximately 25 feet, which serves as a pinch point. The expansion of a cold storage facility could increase capacity and traffic for the transportation of goods via trucks. Widening of Coil Street can help improve the circulation of trucks and vehicles that travel along Coil Street north of Pacific Coast Highway to the subject site and the other industrial business around the subject site. Coil Street has a 7-foot sidewalk from Pacific Coast to Colon Street, which terminates and does not extend to the site's entrance near "O" Street, which disrupts pedestrian access to the entrance of the site.

Therefore, the dedications and improvements required of the subject property are necessary to meet the City's mobility needs for the next 20 years based on guidelines the Street Standards Committee has established.

3. The dedication or improvement requirement is NOT physically impractical.

The project site is located in the Wilmington-Harbor City Community Plan at the northeastern corner of the intersection of Drumm Avenue and Pacific Coast Highway. The site is relatively flat, irregularly-shaped, and is comprised of 18 lots totaling approximately 747,302 square feet (17.16 acres). The property is bounded by Drumm Avenue on the west, and Pacific Coast Highway, Coil Avenue, O Street, and Alameda Street along the south and southeast side of the property. The site has approximately 1,994 feet of frontage along Drumm Avenue, 90 feet along Pacific Coast Highway, 751 feet along Coil Avenue, 636 feet along O Street, and 70 feet along Alameda Street.

The primary site entrance is at the end of Coil Street, intersecting O Street, where there is currently a guardhouse. Truck parking stalls are located all along the building perimeter. There is also truck parking along the tail end of the property, ending on Pacific Coast Highway. Car parking spaces are located all along the property line perimeter, concentrated along O Street and Alameda Street. There are two emergency fire access

driveways along Drumm Avenue, however, no other vehicular access is allowed from Drumm Avenue.

The proposed scope of work involves the improvement and expansion of the existing cold storage facility. The loading dock and freezer addition which is where of the expansion will take place is located on the west side of the existing building closer Drumm Avenue. The office expansion is located along the north side of the building, and the new mechanical rooms are located along O Street.

The above requirements are imposed by BOE to ensure adequate right of ways improvements to meet street standards for stormwater flow and to facilitate mobility and circulation per the goals and policies of the Mobility Plan. As mentioned, Coil Avenue has a varying roadway width at its narrowest point being approximately 25 feet, which serves as a pinch point. The expansion of a cold storage facility could increase capacity and traffic for the transportation of goods via trucks. Widening of Coil Street can help improve the circulation of trucks and vehicles that travel along Coil Street north of Pacific Coast Highway to the subject site and the other industrial business around the subject site.

The long southerly strip of the property abutting Coil Street is currently used for parking truck trailers; therefore, no buildings or required parking spaces will be impacted. Dedication and Improvements would not interfere with the operations of the existing use or the layout of the proposed expansion.

Therefore, the required dedication or improvements is not physically impractical.

Environmental Findings

11. **Negative Declaration.** A Negative Declaration (ENV-2022-6860-ND) was prepared for the proposed project. On the basis of the whole of the record before the lead agency including any comments received, that there is no substantial evidence that the proposed project will have a significant effect on the environment. The attached Negative Declaration reflects the lead agency's independent judgment and analysis. The records upon which this decision is based are with the Project Planning Division of the Planning Department in Room 721, 200 North Spring Street.
12. **Flood Insurance.** The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have been reviewed and it has been determined that this project is located in an area of minimal flood hazard.

PUBLIC HEARING AND COMMUNICATIONS

PUBLIC HEARING

The public hearing was held on May 28, 2025 at approximately 10:30 a.m. Due to concerns over COVID-19, the Public Hearing was conducted in a virtual format. The hearing was conducted by the Hearing Officer, Norali Martinez, on behalf of the City Planning Commission in taking testimony for Case No. CPC-2022-6859-GPA-HD-ZAD-WDI and ENV-2022-6860-ND. All interested parties were invited to attend the public hearing at which they could listen, ask questions, or present testimony regarding the project. The purpose of the hearing was to obtain testimony from affected and/or interested parties regarding this application. Interested parties are also invited to submit written comments regarding the request prior to the hearing. The environmental analysis was among the matters to be considered at the hearing. The hearing notice was mailed on April 25, 2025, published in the newspaper on May 2, 2025, and was posted on-site on May 2, 2025, in accordance with LAMC noticing requirements.

The public hearing was attended by the applicant team (John Parker, Christ Kirikian, Rick Hallenbeck) and approximately six (6) speakers who provided comments in opposition. A representative from Council District 15 (Pamela Thornton) also spoke at the hearing.

Applicant Presentation

- Project site is bounded by Alameda Street on east, rail line on the north, Drumm Avenue on west, O Street on south, and PCH on the south.
- Site is subject to CUGU SUD as a cold storage plant, and the project will comply with those regulations. There are no emissions on property. The site is subject to encroachment plane and landscape setback requirements.
- Site is subject to transitional height for a certain distance from the R1 zone. For the distance from 50-99 feet, the west side of the building depth would be affected by 16.6 feet but will comply. For the distance between 100-199 feet, they are requesting minor deviation to allow 65 feet.
- Site is subject to Ordinance 177243 enacted in January 2006 with restrictions affecting the property, and the project is in compliance with those restrictions. Open storage uses are subject to a 15 foot setback from adjacent residential zone, but no open storage uses existing or proposed. No cargo containers may be kept/stored, but does not prohibit truck parking and truck railers. There is an 8 foot masonry wall requirement from adjoining residential property line. There is no opening on any side of structure facing residential zone within 20 feet of structure.
- The project is in complete compliance with all restrictions in the ordinance and CUGU and Transitional Height, with exception of the 65 foot building height.
- Directly adjacent to the north are train tracks, container storage, chemical processing plant (heavy industrial land use in QM3 zone; to the east are train tracks running parallel along Alameda Street, trucking storage, substantial oil refinery in M3 heavy industrial; south of "O" Street is automotive and parking and storage; to the west, north of Sandison is an impound lot with open truck storage and vacant businesses, prior auto dismantling business; to the west, south of Sandison is single family zoned lots.
- A single train track is no longer in use and would be removed.
- A landscaped setback is being provided, adjacent to a 27 foot wide fire lane. Portions of the site would receive a new addition, other portions would be remodeled.
- The building includes a notch to comply with transitional height and CUGU requirements. The project also includes mechanical room expansion, added fire pump, added electric room, freezer expansion.

- Project involves an addition of approximately 44,000 square feet, conversion of 27,157 square feet; for a combined total of 71,331 sf; and will increase combined new total floor area of 281,899 sf.
- Applicant applied in January 2022 to the Director of Planning to file for GPA. The Director approved initiation of Glan Plan Amendment with additional direction that be provided extended landscape buffer along western boundary running from north end down to Pacific Coast Highway.
- The project will provide 119 parking spaces. The code requires 117 spaces for warehouse; however the project is subject to AB 2097 permitting 0 required parking
- Trees within landscaped setback will be 10 feet apart on center pursuant to landscape exhibits submitted with case (not 15 feet) – and will be constructed to west boundary from Pacific Coast Highway to the north terminus of the site.
- The project is consistent with the General Plan and Community Plan. Existing and proposed use is permitted within light industrial land use category.
- Additional height needed to accommodate new automated racking freezer technology. It requires additional space to lift to top to stack, and will be more efficient.
- Applicant is not seeking relief from Pacific Coast Highway or “O” Street, but requesting a Waiver of Dedication and Improvements for Drumm Avenue and Coil Street with exception to necessary repairs to existing curbs. LAMC requires only one finding for WDI
- Along Drumm Avenue, there are no physical connections, openings, activities, or truck docks; LAFD gates are not permitted for the applicant to use; they have never created truck traffic on Drumm Avenue. A 10-foot widening on Drumm Avenue would require that the landscaped setback would be pushed 10 feet further into property; affecting the 27 foot wide fire lane right next to it; require a redesign of the proposed dock level freezer addition; extensive redesign of both addition and existing connected building. If no 10 foot dedication is required, it will allow facility to remain operating; if dedication is required, the redesign will require operations to cease during remodeling for 10-12 month shutdown. The existing underground pipeline within easement extends north/south parallel along Drumm Avenue directly east of street curb. The dedication would place pipe line with street ROW; if improved, the pipe line would be under roadway of street.
- Coil justification - dedicating would be unrelated to primary impacts; required dedication of 15 ft would double row of coil; not reasonable relation to scope of project; not likely to occur for full local street width;
- The project is consistent with the General Plan Framework, Community Plan, CUGU, Transitional Height, and Ordinance requirements except for the 61 ft Transitional Height
- The applicant is meeting with Wilmington Neighborhood Council (WNC) to get their approval on June 21, 2025

Public Comments in Opposition:

- Applicant stated they had a strong commitment to economic growth, however they are growing the size of the facility but not growing the community. Do not recommend for approval.
- City posted notice that Initial Study comment period was extended to June 12th. They received documents that were not previously available, and will be reviewing reports and will submit comments later. The hearing should be continued to allow comments and questions on the ND to be made.
- Local hiring matters to land use and at a community level. The area has 4.5 times the national average in robbery and vehicle theft. There aren't good skills opportunities for the youth in the area. The applicant should do the right thing and engage in good faith building, community engagement, at regional and citywide level. The project has potential in community to have great impact, but requires community engagement.

- There is an opportunity to serve as beacon of support. The project could be a huge boost to local economy but not looking out for the members of the local community who deserve better. Do not recommend for approval.
- There is opportunity for skilled trade, but the applicant failed to make meaningful commitment to community.
- There are concerns of impacts to homes directly across Drumm Avenue. There has been an increase in trucking traffic. There should not be added development to a suffering community. There is currently violence, vandalism, and trash in the area. It will help the community to have a hotel built there.

The Council District 15 office commented that Council Member McCosker agrees with a path forward that honors community input and acknowledges KPAC proactive engagement with our office under the council member's leadership since he took over CD15. While KPAC reached out early to WNC, there was a communication delay resulting in CD15 just receiving WNC concerns this morning. So respect that information was received, their input, committed to ensuring the project includes meaningful community protections. Want to clarify that CD15 is in support of city planning staff working on Community Plan Update that is in draft form, we are not currently considering any amendments to that doc, but do appreciate/support the entitlement that has been requested in this project under LAMC chapter 1 and current Community Plan. Understand requested exemptions are consistent with draft Community Plan Update especially with height restriction. Would still like to support the project, provided there are some conditions that are supported based on the WNC letter. Also recommend designating stakeholder liaison with CN to continue engagement. Support street improvements on Coil Avenue and O Street, enhanced lighting for safety, signage that includes no welding to reduce emission near homes/schools, defined truck route that is communicated with community with direct path for ingress/egress to KPAC facility while avoiding adjacent residential to reduce truck trips/emissions, commitment to local hires with priority for Wilmington residents. They support the improvements along O Street and Pacific Coast Highway, including signs. A commitment to local hire and summer apprenticeship programs for youth, are from NC letter, support CUGU priorities and a balanced approach to community well being.

WRITTEN CORRESPONDENCE

The Wilmington Neighborhood Council submitted a letter dated May 27, 2025 unable to support the project, because as it stands the project holds no benefits for the community. The letter explains concerns over potential truck traffic increase. The neighborhood council calls for investment in the community and to be a community partner. The letter includes a list of suggestions for improving the community benefits, including 1. Repaving the streets 2. Improving lighting conditions in the surrounding facility 3. Implement a plan to address idling trucks 4. Installing purple air sensors to track pollution in the area 5. Provide free Wi-Fi to the immediate area 6. Hire private security for a 5-block radius 7. Weekly cleanups and power washing of streets, in 5 block radius 8. Regular tree trimming 9. Provide a Youth Employment program 10. Ensure 20% of their workforce is from the community.