APPLICATIONS

APPEAL APPLICATION
Instructions and Checklist

PURPOSE

This application is for the appeal of Los Angeles Department of City Planning determinations, as authorized by the LAMC. For California Environmental Quality Act Appeals, use form CP13-7840. For Building and Safety Appeals and Housing Department Appeals, use form CP13-7854.

RELATED CODE SECTION

Refer to the Letter of Determination (LOD) for the subject case to identify the applicable Los Angeles Municipal Code (LAMC) Section for the entitlement and the appeal procedures.

APPELLATE BODY

Check only one. If unsure of the Appellate Body, check with City Planning staff before submission.

☐ Area Planning Commission (APC) ☐ City Planning Commission (CPC) ☑ City Council

☐ Zoning Administrator (ZA)

CASE INFORMATION

Case Number: CPC-2022-6859-GPA-HD-ZAD-WDI, ENV-2022-6860-ND

APN: 7426028006, 7426028811, 7426029006, 7426029007, 7426029005, 7426030004, 7426030005, 7426030006, 7426030007, 7426030008, 7426030009, 7426030010, 7426030011, 7426030012, 7426030013, and 7426030015

Project Address: 1420, 1500 North Coil Avenue; 1532, 1540, 1542 North Alameda Street

Final Date to Appeal: October 15, 2025

APPELLANT

Check all that apply.

☑ Person, other than the Applicant, Owner or Operator claiming to be aggrieved

☑ Representative ☐ Property Owner ☐ Applicant ☐ Operator of the Use/Site

APPELLANT INFORMATION

Appellant Name: Coalition for Responsible Equitable Economic Development Los Angeles c/o Andrew Graf

Company/Organization: Adams Broadwell Joseph & Cardozo

Mailing Address: 601 Gateway Blvd., Suite 1000

City: South San Francisco **State:** CA **Zip Code:** 94080

Telephone: 650 589-1660 **E-mail:** agraf@adamsbroadwell.com

Is the appeal being filed on your behalf or on behalf of another party, organization, or company?

☐ Self ☑ Other: CREED LA

Is the appeal being filed to support the original applicant's position? ☐ **YES** ☑ **NO**

REPRESENTATIVE / AGENT INFORMATION

Name: Andrew Graf

Company/Organization: Adams Broadwell Joseph & Cardozo

Mailing Address: 601 Gateway Blvd., Suite 1000

City: South San Francisco **State:** CA **Zip Code:** 94080

Telephone: 650 589-1660 **E-mail:** agraf@adamsbroadwell.com

JUSTIFICATION / REASON FOR APPEAL

Is the decision being appealed in its entirety or in part? ☑ **Entire** ☐ **Part**

Are specific Conditions of Approval being appealed? ☑ **YES** ☐ **NO**

If Yes, list the Condition Number(s) here: All Conditions and Approvals

On a separate sheet provide the following:

☑ Reason(s) for the appeal

☑ Specific points at issue

☑ How you are aggrieved by the decision

APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true.

Appellant Signature: _____ **Date:** 10/09/2025

GENERAL NOTES

A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.

The appellate body must act on the appeal within a time period specified in the LAMC Section(s) pertaining to the type of appeal being filed. Los Angeles City Planning will make its best efforts to have appeals scheduled prior to the appellate body's last day to act in order to provide due process to the appellant. If the appellate body is unable to come to a consensus or is unable to hear and consider the appeal prior to the last day to act, the appeal is automatically deemed denied, and the original decision will stand. The last day to act as defined in the LAMC may only be extended if formally agreed upon by the applicant.

THIS SECTION FOR CITY PLANNING STAFF USE ONLY

Base Fee: _____

Reviewed & Accepted by (DSC Planner): _____

Receipt No.: _____ **Date:** _____

☐ Determination authority notified ☐ Receipt Number

GENERAL APPEAL FILING REQUIREMENTS

If dropping off an appeal at a Development Services Center (DSC), the following items are required. See also additional instructions for specific case types. To file online, visit our Online Application System (OAS).

APPEAL DOCUMENTS

1. Hard Copy

Provide three sets (one original, two duplicates) of the listed documents for each appeal filed.

☐ Appeal Application

☐ Justification/Reason for Appeal

☐ Copy of Letter of Determination (LOD) for the decision being appealed

2. Electronic Copy

☐ Provide an electronic copy of the appeal documents on a USB flash drive. The following items must be saved as individual PDFs and labeled accordingly (e.g., "Appeal Form", "Justification/Reason Statement", or "Original Determination Letter"). No file should exceed 70 MB in size.

3. Appeal Fee

☐ *Original Applicant.* The fee charged shall be in accordance with LAMC Section 19.01 B.1(a) of Chapter 1 or LAMC Section 15.1.1.F.1.a. (Appeal Fees) of Chapter 1A as applicable, or a fee equal to 85% of the original base application fee. Provide a copy of the original application receipt(s) to calculate the fee.

☐ *Aggrieved Party.* The fee charged shall be in accordance with LAMC Section 19.01 B.1(b) of Chapter 1 or LAMC Section 15.1.1.F.1.b. (Appeal Fees) of Chapter 1A as applicable

4. Noticing Requirements (Applicant Appeals Only)

☐ *Copy of Mailing Labels.* All appeals require noticing of the appeal hearing per the applicable LAMC Section(s). Original Applicants must provide noticing per the LAMC for all Applicant appeals. See the Mailing Procedures Instructions (CP13-2074) for applicable requirements.

SPECIFIC CASE TYPES
ADDITIONAL APPEAL FILING REQUIREMENTS AND / OR LIMITATIONS

DENSITY BONUS (DB) / TRANSIT ORIENTED COMMUNITES (TOC)

Appeal procedures for DB/TOC cases are pursuant to LAMC Section 13B.2.5. (Director Determination) of Chapter 1A or LAMC Section 13B.2.3. (Class 3 Conditional Use) of Chapter 1A as applicable.

- Off-Menu Incentives or Waiver of Development Standards are not appealable.
- Appeals of On-Menu Density Bonus or Additional Incentives for TOC cases can only be filed by adjacent owners or tenants and is appealable to the City Planning Commission.

☐ Provide documentation confirming adjacent owner or tenant status is required (e.g., a lease agreement, rent receipt, utility bill, property tax bill, ZIMAS, driver's license, bill statement).

WAIVER OF DEDICATION AND / OR IMPROVEMENT

Procedures for appeals of Waiver of Dedication and/or Improvements (WDIs) are pursuant to LAMC Section 12.37 I of Chapter 1 or LAMC Section 10.1.10. (Waiver and Appeals) of Chapter 1A as applicable.

- WDIs for by-right projects can only be appealed by the Property Owner.
- If the WDI is part of a larger discretionary project, the applicant may appeal pursuant to the procedures which govern the main entitlement.

[VESTING] TENTATIVE TRACT MAP

Procedures for appeals of [Vesting] Tentative Tract Maps are pursuant LAMC Section 13B.7.3.G. of Chapter 1A.

- Appeals must be filed within 10 days of the date of the written determination of the decision-maker.

NUISANCE ABATEMENT / REVOCATIONS

Appeal procedures for Nuisance Abatement/Revocations are pursuant to LAMC Section 13B.6.2.G. of Chapter 1A. Nuisance Abatement/Revocations cases are only appealable to the City Council.

Appeal Fee

☐ *Applicant (Owner/Operator).* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(a) of Chapter 1 or LAMC Section 15.1.1.F.1.a. (Appeal Fees) of Chapter 1A as applicable.

For appeals filed by the property owner and/or business owner/operator, or any individuals/agents/representatives/associates affiliated with the property and business, who files the appeal on behalf of the property owner and/or business owner/operator, appeal application fees listed under LAMC Section 19.01 B.1(a) of Chapter 1 shall be paid, at the time the appeal application is submitted, or the appeal application will not be accepted.

☐ *Aggrieved Party.* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(b) of Chapter 1 or LAMC Section 15.1.1.F.1.b. (Appeal Fees) of Chapter 1A as applicable.

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ISABEL TAHIR

Of Counsel
DANIEL L. CARDOZO
MARC D. JOSEPH

October 9, 2025

VIA Online Submission
City Council
City of Los Angeles
Online Portal: https://planning.lacity.gov/oas

VIA Email and U.S. Mail
Norali Martinez
City Planner
Department of City Planning
City of Los Angeles
200 North Spring Street
Los Angeles, California 90012
norali.martinez@lacity.org

Re: **Appeal of City Planning Commission Decisions for KPAC Coil Avenue Freezer Expansion Project (CPC-2022-6859-GPA-HD-ZAD-WDI, ENV-2022-6860-ND)**

Dear City Council and Ms. Martinez:

We write on behalf of the Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA") to appeal the entitlements and environmental approvals set forth in the September 25, 2025 Letter of Determination ("LOD") for the KPAC Coil Avenue Freezer Expansion Project (CPC-2022-6859-GPA-HD-ZAD-WDI, ENV-2022-6860-ND) ("Project") proposed by Konoike Pacific California Inc. ("Applicant").[1]

The City Planning Commission ("CPC") abused its discretion and failed to proceed in the manner required by law in approving the Project's entitlements and adopting a Negative Declaration ("ND") which failed to disclose or mitigate the Project's potentially significant environmental and public health impacts, as

[1] **Exhibit A**, Los Angeles City Planning Commission, Letter of Determination re: 1420, 1500 North Coil Avenue; 1532, 1540, 1542 North Alameda Street (Sept. 24, 2025).

required by the California Environmental Quality Act ("CEQA").[2] CREED LA respectfully requests that the City Council uphold this appeal, vacate the CPC's findings, recommendations, adoptions, and approvals with respect to the Project, and remand this matter to City staff with direction to prepare an environmental impact report ("EIR") that fully discloses, analyzes, and mitigates the Project's significant environmental impacts in compliance with CEQA.

I. DECISIONS BEING APPEALED

On September 25, 2025, the CPC issued a LOD affirming the following decisions were made at the August 14, 2025 meeting in conjunction with the Project:

1. **Found**, 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, and all comments received, there is no substantial evidence that the project will have a significant effect on the environment; **Found** the Negative Declaration reflects the independent judgment and analysis of the City; **Adopted** the Negative Declaration;
2. **Approved** and **recommended** that the Mayor and City Council **adopt** the attached resolution, pursuant to City Charter Section 555 and Section 11.5.6 of the LAMC, 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. **Approved** and **recommended** that the City Council **adopt** the attached ordinance**,** pursuant to LAMC Section 12.32, for a Height District Change from Height District No. 1VL to 1L;
4. **Approved**, 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;

[2] City of Los Angeles, Initial Study: KPAC Coil Avenue Freezer Expansion Project (Apr. 2025), *available at* https://planning.lacity.gov/odocument/e1530a49-43ec-49de-9db4-95396a173b68/ENV-2022-6860.pdf.

6. **Denied** pursuant to LAMC Section 12.37, a Waiver of Dedication and Improvements from a 15-foot dedication and all improvement requirements along Coil Avenue;
7. **Adopted** the attached Conditions of Approval; and
8. **Adopted** the attached Findings.

This appeal challenges all determinations and actions by the CPC that are appealable under the Los Angeles Municipal Code ("LAMC"), including but not limited to, the City's adoption of the ND.

II. STANDING TO APPEAL AND STATEMENT OF INTEREST

CREED LA has standing to appeal the Project's approvals. Regarding the Project's Zoning Administrator Determination, Section 12.24.I.2 of the LAMC, "any other person aggrieved by the initial decision of … the City Planning Commission may appeal the decision to the City Council." Pursuant to Section 11.5.13 of the LAMC, the Project's CEQA determination is appealed with the underlying action.[3]

CREED LA is a non-profit organization formed to ensure that the construction of major urban projects in the Los Angeles Region proceeds in a manner that minimizes public and worker health and safety risks, avoids or mitigates environmental and public service impacts, and fosters long-term sustainable construction and development opportunities. The organization members include Los Angeles residents Jesus Reyes, Ezequiel Sanchez, Valentin Castelan, and Jaime Flores, Sheet Metal Workers Local 105, International Brotherhood of Electrical Workers Local 11, Southern California Pipe Trades District Council 16, and District Council of Iron Workers of the State of California, along with their members, their families, and other individuals who live and work in the Los Angeles Region.

CREED LA and its members are interested persons who would be adversely affected by the CPC's decisions in Case No. CPC-2022-6859-GPA-HD-ZAD-WDI, ENV-2022-6860-ND. CREED LA's individual members live, work, recreate, and raise families in the City and surrounding communities. Accordingly, they will be directly affected by the environmental and health and safety impacts of the Project. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards created by the Project. They each have

[3] LAMC § 11.5.13(C)(1), (D)

a personal interest in protecting the Project area from unnecessary, adverse environmental and public health impacts.

CREED LA has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making the area less desirable for new businesses and new residents. Continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

CREED LA supports the development of commercial and residential projects where properly analyzed and carefully planned to minimize impacts on public health, climate change, and the environment. These projects should avoid adverse impacts to air quality, public health, climate change, noise, and traffic, and must incorporate all feasible mitigation to ensure that any remaining adverse impacts are reduced to the maximum extent feasible. Only by maintaining the highest standards can commercial development truly be sustainable.

CREED LA participated in the Project's public comment and approval process, and this appeal is timely filed within 20 days of the mailing date of the LOD. CREED LA has standing to appeal the CPC's actions.

III. JUSTIFICATION/REASON FOR APPEAL

On June 12, 2025, CREED LA submitted comments, supported by expert technical reports, on the Draft ND during the extended public comment period.[4] These comments, supported by expert technical reports, identified potentially significant impacts to air quality, noise, and public health from the Project's construction and operational phases that the ND failed to disclose or adequately mitigate.[5]

In response, the City's consultant prepared Responses to Comments ("RTCs"), which assert that the ND complies with CEQA and that no EIR is required, relying on revised technical reports that were not available during the public comment

[4] **Exhibit B**, Letter to Norali Martinez City of Los Angeles from Andrew J. Graf, Adams Broadwell Joseph & Cardozo re: Comments on Negative Declaration for KPAC Coil Avenue Freezer Expansion Project (Case No. ENV-2022-6860-ND, SCH No. 2025041295) (June 12, 2025).
[5] *Id.*, attach. A-B.

period.[6] However, on August 4, 2025, CREED LA submitted comments to the CPC demonstrating that the City's RTCs failed to cure the documents fundamental analytical deficiencies.[7] On August 11, 2025, CREED LA submitted supplemental comments to the CPC further expanding upon these concerns.[8] These two comment letters and their accompanying expert reports are attached as exhibits, incorporated herein by reference, and form the basis for this appeal of the CPC's decisions on the Project.

Specifically, CREED LA's air quality and public health expert, James J. Clark, Ph.D., demonstrated that construction of the proposed Project would increase the cumulative cancer risk for nearby residential receptors by an additional 2.27 in 1 million, further exacerbating existing health risks and resulting in a significant health risk that the ND failed to disclose or mitigate. South Coast Air Quality Management District data shows that the proposed Project is located in an area that already experiences an air toxic cancer risk of 664 in one million, a level 98% higher than the average for all other zip codes in the South Coast Air Basin. Notably, over 66% of that risk is attributable to diesel particulate matter ("DPM"), the same pollutant emitted from construction equipment and heavy-duty trucks associated with the Project. Dr. Clark explained that, in this context, the additional cancer risks cannot be dismissed as less than significant because the Project's emissions increase community exposure levels, causing a statistically meaningful increase in harm in a community already overburdened by exposure to toxic emissions.

Dr. Clark also demonstrated that the ND underestimated operational emissions because it excluded key emissions sources, including transportation refrigeration units, cargo handling equipment, and fire pumps. The ND conclusion that operational emissions would be less than significant was therefore unsupported, and the City's RTCs, which did not quantify these emissions, were similarly unsubstantiated. In approving the Project, the City also improperly relied

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[6] **Exhibit C**, Letter to Norali Martinez, City of Los Angeles from Christian Kirkian, Meridian Consultants re: Response to Comments on the Negative Declaration (ND) for KPAC Coil Avenue Freezer Expansion Project (Case No. ENV-2022-6860-ND, SCH No. 2025041295) from Adams Broadwell Joseph & Cardozo letter dated June 12, 2025 (June 23, 2025).
[7] **Exhibit D**, Letter to Monique Lawshe, City of Los Angeles from Andrew J. Graf, Adams Broadwell Joseph & Cardozo re: City Planning Commission 8/14/25 Hearing for 1420 Coil Avenue Freezer Expansion Project (CPC-2022-6859-GPA-HD-ZAD-WDI, ENV-2022-6860-ND) (Aug. 4, 2025).
[8] **Exhibit E**, Letter to Monique Lawshe, City of Los Angeles from Andrew J. Graf, Adams Broadwell Joseph & Cardozo re: ITEM 6: CREED LA Supplemental Comments on 1420 Coil Avenue Freezer Expansion Project (CPC-2022-6859-GPA-HD-ZAD-WDI, ENV-2022-6860-ND) (Aug. 11, 2025).

on regulatory measures that do not eliminate emissions or associated health risks. The Project's operational emissions sources will therefore pose significant, unmitigated health risks, particularly to the surrounding communities which are overburdened by severe air pollution.

Dr. Clark's comments provided the City with 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.

In addition, CREED LA's noise expert, Ani Toncheva, demonstrated that the ND's baseline analysis was fundamentally flawed because the noise measurements were unsupported, inconsistent with industry standards and regulatory guidance, and failed to capture the full extent of construction-related noise. Even with these errors, Ms. Toncheva's site-specific noise analysis demonstrated that construction of 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 by the LAMC, and surpass the 80 dBA absolute threshold relied upon by the ND, resulting in significant noise impacts which the ND failed to disclose or mitigate. Finally, Ms. Toncheva demonstrates that the City lacks substantial evidence to conclude that operational noise impacts would be less than significant because the City failed to provide the underlying modeling necessary to independently evaluate the ND's claim.

Ms. Toncheva's comments provided the City with substantial evidence supporting a fair argument that the Project may have significant, unmitigated noise impacts which were not disclosed or mitigated in the ND, and which the CPC did not address before approving the Project.

Considering these flaws, the CPC's adoption of the ND violated CEQA and was an abuse of discretion. The record contains substantial evidence from qualified experts supporting a fair argument that the Project may result in significant, unmitigated environmental impacts. The record also demonstrates that the CPC abused its discretion in approving the Project, as it lacked substantial evidence to support the required land use findings in light of the Project's significant and unmitigated public health and environmental impacts. The LOD does not contain any new supporting evidence or analysis addressing CREED LA's comments, nor has the City revised the Project or the ND to resolve these flaws. Thus, the findings

in the LOD is not supported by substantial evidence, and the CPC's decisions must be vacated.

IV. REQUEST TO UPHOLD APPEAL, VACATE APPROVALS, AND PREPARE AN EIR

CREED LA urges the City Council to uphold this appeal, vacate the CPC's approvals, and remand this matter to City staff with directions to prepare an EIR that fully discloses, analyzes, and mitigates all the Project's environmental impacts in compliance with CEQA.

Thank you for your consideration of this appeal.

Sincerely,

Andrew J. Graf

Attachments
AJG:acp

EXHIBIT A

LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300
www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: SEPTEMBER 25, 2025

Case No.: CPC-2022-6859-GPA-HD-ZAD-WDI Council District: 15 – McOsker
CEQA: ENV-2022-6860-ND (SCH. NO. 2025041295)
Plan Area: Wilmington – Harbor

Project Site: 1420, 1500 North Coil Avenue; 1532, 1540, 1542 North Alameda Street

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

At its meeting of **August 14, 2025**, the Los Angeles City Planning Commission took the actions below in conjunction with the following Project:

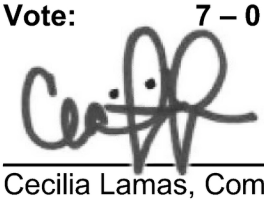
Improvement and expansion of an existing one-story, 42-foot tall, 221,496 square-foot cold storage facility, resulting in a two-story, 65-foot tall, 267,960 square foot facility, with a total 0.36:1 Floor Area Ratio (FAR). The expansion includes the demolition of 27,157 square feet of an existing cold 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.

1. **Found**, 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; **Found** the Negative Declaration reflects the independent judgment and analysis of the City; **Adopted** the Negative Declaration;
2. **Approved** and **recommended** that the Mayor and City Council **adopt** the attached resolution, pursuant to City Charter Section 555 and Section 11.5.6 of the Los Angeles Municipal Code (LAMC), 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. **Approved** and **recommended** that the City Council **adopt** the attached ordinance, pursuant to LAMC Section 12.32, for a Height District Change from Height District No. 1VL to 1L;
4. **Approved**, 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. **Denied** pursuant to LAMC Section 12.37, a Waiver of Dedication and Improvements from a 15-foot dedication and all improvement requirements along Coil Avenue;
7. **Adopted** the attached Conditions of Approval; and
8. **Adopted** the attached Findings.

The vote proceeded as follows:

Moved: Lawshe
Second: Choe
Ayes: Cabildo, Diaz, Mack, Saitman, Zamora
Absent: Klein

Vote: 7 – 0



Cecilia Lamas, Commission Executive Assistant II
Los Angeles City Planning Commission

Fiscal Impact Statement: There is no General Fund impact as administrative costs are recovered through fees.

APPEAL PERIOD - EFFECTIVE DATE

The decision of the Los Angeles City Planning Commission as it relates to the General Plan Amendment is not further appealable and will proceed to the City Council for final decision. The Height District Change is appealable by the Applicant only if disapproved in whole or in part by the Commission. The decision of the Commission regarding the remaining approvals are appealable to the Los Angeles City Council within **20 days** after the mailing date of this determination letter. Any appeal not filed within the 20-day period shall not be considered by the Council.

FINAL APPEAL DATE: OCTOBER 15, 2025

Notice: An appeal of the CEQA clearance for the Project pursuant to Public Resources Code Section 21151(c) is only available if the Determination of the non-elected decision-making body (e.g., ZA, AA, APC, CPC) **is not further appealable** and the decision is final.

This grant is not a permit or license and any permits and/or licenses required by law must be obtained from the proper public agency. If any Condition of this grant is violated or not complied with, then the applicant or their successor in interest may be prosecuted for violating these Conditions the same as for any violation of the requirements contained in the Los Angeles Municipal Code (LAMC).

This determination will become effective after the end of appeal period date listed above, unless an appeal is filed with the Department of City Planning. An appeal application must be submitted and paid for before 4:30 PM (PST) on the final day to appeal the determination. Should the final day fall on a weekend or legal City holiday, the time for filing an appeal shall be extended to 4:30 PM (PST) on the next succeeding working day. Appeals should be filed early to ensure the Development Services Center (DSC) staff has adequate time to review and accept the documents, and to allow appellants time to submit payment.

An appeal may be filed utilizing the following options:

Online Application System (OAS): The OAS (https://planning.lacity.gov/oas) allows entitlement appeals to be submitted entirely electronically by allowing an appellant to fill out and submit an appeal application online directly to City Planning's DSC, and submit fee payment by credit card or e-check.

Drop off at DSC. Appeals of this determination can be submitted in-person at the Metro or Van Nuys DSC locations, as well as the South Los Angeles DSC on Tuesdays and Thursdays, and payment can be made by credit card or check. City Planning has established drop-off areas at the DSCs with physical boxes where appellants can drop off appeal applications; alternatively, appeal applications can be filed with staff at DSC public counters. Appeal applications must be on the prescribed forms, and accompanied by the required fee and a copy of the determination letter. Appeal applications shall be received by the DSC public counter and paid for on or before the above date or the appeal will not be accepted.

Forms are available online at http://planning.lacity.gov/development-services/forms. Public offices are located at:

Metro DSC	Van Nuys DSC	South LA DSC
201 N. Figueroa Street Los Angeles, CA 90012 planning.figcounter@lacity.org (213) 482-7077	6262 Van Nuys Boulevard Van Nuys, CA 91401 planning.mbc2@lacity.org (818) 374-5050	8475 S. Vermont Avenue,1st Floor Los Angeles, CA 90044 (In person appointments available on Tuesdays and Thursdays 8am-4pm only) planning.southla@lacity.org

City Planning staff may follow up with the appellant via email and/or phone if there are any questions or missing materials in the appeal submission, to ensure that the appeal package is complete and meets the applicable LAMC provisions.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

Verification of condition compliance with building plans and/or building permit applications are done at the City Planning Metro or Valley DSC locations. An in-person or virtual appointment for Condition Clearance can be made through the City's BuildLA portal (appointments.lacity.gov). The applicant is further advised to notify any consultant representing you of this requirement as well.

QR Code to Online Appeal Filing

QR Code to Forms for In-Person Appeal Filing

QR Code to BuildLA Appointment Portal for Condition Clearance

Attachments: Ordinance, Maps, Conditions of Approval, Findings, Resolution

cc: Theodore L. Irving, Principal City Planner
Connie Chauv, Senior City Planner
Norali Martinez, City Planner

ORDINANCE NO. _____

An ordinance amending Section 12.04 of the Los Angeles Municipal Code by amending the zoning map.

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section 1. Section 12.04 of the Los Angeles Municipal Code is hereby amended by changing the zone and zone boundaries shown upon a portion of the zone map attached thereto and made a part of Article 2, Chapter 1 of the Los Angeles Municipal Code, so that such portion of the zoning map shall be as follows:


(T)[Q]M3-1L-CUGU
(T)[Q]MR2-1L-CUGU
(T)[Q]MR2-1L-CUGU
(T)[Q]MR2-1L-CUGU
EXISTING ZONE LINE
EXISTING ZONE LINE
EXISTING ZONE LINE
EXISTING ZONE LINE
SELY LINE OF TR 584
SW'LY LINE LOT 2, TR 13038
40.73
46.78
N 29° 46' 27" W
133.50
55.75
40.25
319.65
140
N 15° 28' 10" E
120.36
N 17° 18' 21" W
253.48
40
51.37
58.78
132.96
40
50
26.73
N 86° 36' 16" E
Q ST
GAMBLE AVE
SANDISON ST
CRUCES ST
DRUMM AVE
O ST
O ST
ALAMEDA ST
ALAMEDA ST
COLON ST
COLON ST
COLON ST
COIL AVE
BLINN AVE
PACIFIC COAST HWY
0
250
500
Feet
CPC-2022-6859-GPA-HD-ZAD-WDI
CF/aa
082025
Data Sources: Department of City Planning & Bureau of Engineering
City of Los Angeles
Wilmington - Harbor City

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) – 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. 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. A minimum depth with a height ranging from 15 to 40 feet shall be 42 inches.
    b. A minimum depth with a height ranging from 1 to 15 feet shall be 24 to 36 inches.
    c. A minimum depth with a height of less than 1 foot shall be 18 inches.
    d. 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:
    e. 220 cubic feet for trees with a canopy diameter ranging from 15 to 19 feet.
    f. 400 cubic feet for trees with a canopy diameter ranging from 20 to 24 feet.
    g. 620 cubic feet for trees with a canopy diameter ranging from 25 to 29 feet.
    h. 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 uses[1]. 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.

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[1] 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 acjacent 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 acjacent 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 acjacent 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 polies 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 polices 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 serves 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 of 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 balances 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.

RESOLUTION

WHEREAS, the subject property is located within the area covered by the Wilmington-Harbor City Community Plan ("Community Plan"), which was adopted by the City Council on July 14, 1999 (CF 98-1619); and

WHEREAS, the applicant is proposing 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 improvements and 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; and

WHEREAS, to carry out the above-referenced project, the applicant has requested a General Plan Amendment to amend Footnote No. 10 of the Community Plan to allow a site-specific 65-foot height limit; and

WHEREAS, the General Plan Amendment is consistent with Charter Sections 555, 556, and 558, representing an Amendment in Part of the Wilmington-Harbor City Community Plan, representing a change to the social, physical and economic identity of the project site; and

WHEREAS, the City Planning Commission at its meeting of August 14, 2025, approved the foregoing General Plan Amendment; and

WHEREAS, the General Plan Amendment is necessary to achieve and maintain consistency between zoning and the adopted Community Plan as required by California State law; and

WHEREAS, pursuant to the provisions of the Los Angeles City Charter, the Mayor and the City Planning Commission have transmitted their recommendations; and

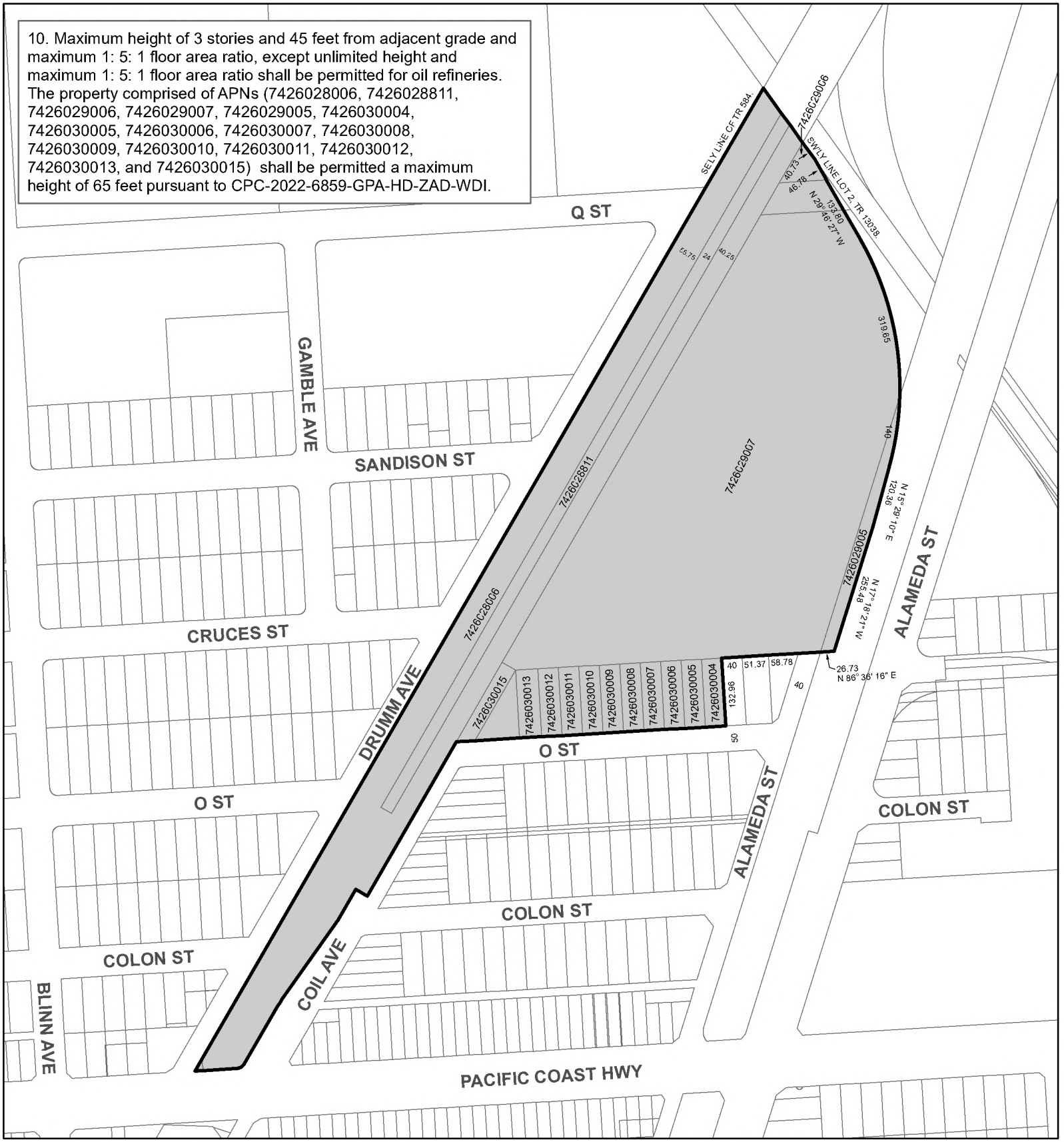
WHEREAS, the requested General Plan Amendment is consistent with the intent and purpose of the Wilmington-Harbor City Community Plan to designate allowable heights in an orderly and unified manner; and

WHEREAS, the subject request would provide for a more logical and uniform pattern of planned land use development that is compatible with surrounding land use designations on the General Plan; and

WHEREAS, the project has been reviewed by Negative Declaration, ENV-2022-6860-ND, in accordance with the City's Guidelines for implementation of the California Environmental Quality Act ("CEQA") by the City Planning Department.

NOW, THEREFORE, BE IT RESOLVED that the Community Plan shall be amended as shown on the attached General Plan Amendment Map.

10. Maximum height of 3 stories and 45 feet from adjacent grade and maximum 1: 5: 1 floor area ratio, except unlimited height and maximum 1: 5: 1 floor area ratio shall be permitted for oil refineries. The property comprised of APNs (7426028006, 7426028811, 7426029006, 7426029007, 7426029005, 7426030004, 7426030005, 7426030006, 7426030007, 7426030008, 7426030009, 7426030010, 7426030011, 7426030012, 7426030013, and 7426030015) shall be permitted a maximum height of 65 feet pursuant to CPC-2022-6859-GPA-HD-ZAD-WDI.



Footnote #10 amended for the Wilmington - Harbor Community Plan General Plan Land Use Map.

0 250 500 Feet

CPC-2022-6859-GPA-HD-ZAD-WDI

CF/ RJ WILMINGTON - HARBOR CITY 082025

Data Sources: Department of City Planning & Bureau of Engineering

City of Los Angeles

EXHIBIT A

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June 12, 2025

VIA E-Mail and Overnight Mail

Norali Martinez
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Re: **Comments on Negative Declaration for KPAC Coil Avenue Freezer Expansion Project (Case No. ENV-2022-6860-ND, SCH No. 2025041295)**

Dear Ms. Martinez:

We write on behalf of the Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA") to provide comments on the Negative Declaration[1] ("ND") prepared by the City of Los Angeles ("City") for the KPAC Coil Avenue Freezer Expansion Project ("Project") proposed by Alston Construction Company, Inc. ("Applicant").

The proposed Project involves the expansion of an existing cold storage facility,[2] including the demolition and alteration of approximately 27,157 square foot of existing cold dock area to accommodate a new 71,331 square foot freezer.[3] Following the expansion, the facility plans to increase its operational schedule by adding one 8-hour shift on Saturdays.[4] Construction is anticipated to occur over a one-year period and will be executed in five phases: demolition, grading, building construction, paving, and architectural coating.[5]

[1] City of Los Angeles, Initial Study: KPAC Coil Avenue Freezer Expansion Project (Apr. 2025) (hereinafter "ND"), *available at* https://planning.lacity.gov/odocument/e1530a49-43ec-49de-9db4-95396a173b68/ENV-2022-6860.pdf.
[2] ND at p. 6.
[3] *Ibid.*
[4] *Ibid.*
[5] *Id.* at p. 12.

CREED LA's evaluation of the ND and supporting documents demonstrate that the ND fails to comply with the California Environmental Quality Act ("CEQA").[6] The ND fails to provide comprehensive disclosure, assessment, and mitigation of potentially significant impacts to air quality, noise, and public health from the Project's construction and operational phases, and the City lacks substantial evidence to support the ND's conclusions that there will be no significant environmental impacts or that no mitigation is required. As detailed below, substantial evidence supports a fair argument that the Project may have potentially significant air quality, noise, and public health impacts that require mitigation and necessitate preparation of an environmental impact report ("EIR").

For example, the ND fails to accurately evaluate health risk from exposure to toxic air emissions by failing to disclose baseline health conditions in the surrounding community and relying on unsupported significance thresholds designed to assess impacts from criteria pollutants, rather than toxic air contaminants ("TACs"). The Project site is located near economically and socially vulnerable communities that are already burdened by elevated levels of high toxic air pollution. According to Multiple Air Toxics Exposure Study V ("MATES V") conducted by the South Coast Air Quality Management District ("SCAQMD"), the existing cumulative cancer risk in the zip code where the Project is situated is 664 in 1 million – placing it in the top 2% of communities in the South Coast Air Basin most impacted by TACs.[7] Notably, more than 66% of the existing risk is due to exposure to diesel particulate matter ("DPM"), a TAC that will be emitted during Project construction and operation.[8]

Moreover, CalEnviroScreen data indicate that the census tract encompassing the Project site ranks in the top 3% statewide for overall environmental and economic vulnerability, making it one of the most overburdened communities in California.[9] CREED LA's air quality expert, James J. Clark, Ph.D., concludes that the health risk posed to the surrounding community from exposure to the Project's TAC emissions in light of the existing health burden may result in significant individual and cumulative health impacts which the ND fails to disclose or mitigate.

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[6] Pub. Res. Code §§ 21000 *et seq.*
[7] Letter to Andrew J. Graf, Adams Broadwell Joseph & Cardozo from James J. Clark, Clark & Associates Environmental Consulting re: Comments on Draft Initial Study/Negative Declaration for KPAC Coil Avenue Freezer Expansion Project, Wilmington, CA (Case Number: ENV-2022-6860-ND) (May 22, 2025) pp. 5-6 (hereinafter "Clark Comments").
[8] *Id.* at p. 5.
[9] Office on Environmental Health Hazard Assessment, CalEnviroScreen 4.0, https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/CalEnviroScreen-4_0 (last visited May 27, 2025).

In addition, CREED LA's noise expert, Ani Toncheva, concludes that demolition activity during Project construction may exceed ambient noise levels by 11 dB, violating the City's 80-dBA absolute noise threshold and resulting in significant noise impacts. The ND fails to demonstrate that the proposed Project would comply with applicable construction noise ordinances and fails to evaluate operational noise sources, resulting in undisclosed and unmitigated noise impacts. The ND also fails to accurately characterize baseline noise conditions by improperly relying on 15-minute measurements taken on a single weekday morning, which are not representative of the surrounding community or the Project's expanded operations.

CREED LA urges the City to comply with CEQA and land use laws by preparing an EIR for the Project which fully discloses the Project's significant impacts, implements mitigation measures to reduce adverse impacts to the greatest extent feasible, and evaluates a reasonable range of project alternatives in accordance with CEQA's requirements. These comments are supported by the comments of Dr. Clark and Ms. Toncheva. Their reports and qualifications are incorporated by reference and included as **Attachment A** and **Attachment B**,[10] respectively. The City must respond to each expert's comments separately and fully.

I. STATEMENT OF INTEREST

CREED LA is a non-profit organization formed to ensure that the construction of major urban projects in the Los Angeles region proceeds in a manner that minimizes public and worker health and safety risks, avoids or mitigates environmental and public service impacts, and fosters long-term sustainable construction and development opportunities. The organization's members include Wilmington residents Jesus Reyes, Ezequiel Sanchez, Valentin Castelan, and Jaime Flores, Sheet Metal Workers Local 105, International Brotherhood of Electrical Workers Local 11, Southern California Pipe Trades District Council 16, and District Council of Iron Workers of the State of California, along with their members, their families, and other individuals who live and work in the Los Angeles region.

CREED LA's individual members live, work, recreate, and raise families in the City and surrounding communities. Accordingly, they will be directly affected by the environmental and health and safety impacts of the Project. Individual members may also work on the Project itself. They will be first in line to be exposed

[10] Letter to Andrew J. Graf, Adams Broadwell Joseph & Cardozo from Ani Toncheva, Wilson Ihrig re: KPA Coil Avenue Freezer Expansion Project, Wilmington, CA, Review and Comment on Noise Study (May 22, 2025) (hereinafter "Toncheva Comments").

to any health and safety hazards created by the Project. They each have a personal interest in protecting the Project area from unnecessary, adverse environmental and public health impacts.

CREED LA has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making the area less desirable for new businesses and new residents. Continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

CREED LA supports the development of commercial and residential projects where properly analyzed and carefully planned to minimize impacts on public health, climate change, and the environment. These projects should avoid adverse impacts to air quality, public health, climate change, noise, and traffic, and must incorporate all feasible mitigation to ensure that any remaining adverse impacts are reduced to the maximum extent feasible. Only by maintaining the highest standards can commercial development truly be sustainable.

II. THE CITY MUST PREPARE AN ENVIRONMENTAL IMPACT REPORT

CEQA requires that lead agencies prepare an EIR for projects that could have significant environmental effects, except in limited circumstances.[11] The purpose of an EIR is to ensure that the public and decision-makers are fully informed about potential environmental consequences before decisions are made, thus promoting informed decision-making and protecting the environment.[12]

The "fair argument" standard creates a presumption in favor of more robust environmental review in an EIR when it is unclear if a project has significant impacts. Under this standard, an EIR must be prepared if there is substantial evidence in the record indicating a fair argument that the project could significantly impact the environment.[13] The fair argument standard sets a "low threshold" for triggering environmental review through an EIR, rather than through a negative declaration, which is only appropriate if the proposed project will not have a

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[11] Pub. Res. Code § 21000; 14 Cal. Code Regs. ("CEQA Guidelines") § 15002.
[12] *Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 564.
[13] Pub. Res. Code §§ 21080(d), 21082.2(d); CEQA Guidelines §§ 15002(k)(3), 15064(f)(1), (h)(1); *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1993) 6 Cal.4th 1112, 1123; *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75, 82; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 1501-51; *Quail Botanical Gardens Found., Inc. v. City of Encinitas* (1994) 29 Cal.Appl.4th 1597, 1601-02.

significant effect on the environment.[14] The Initial Study procedure implements CEQA's requirement that the agency prepare an EIR if it finds that a proposed project may have a significant effect on the environment.[15] Because "[t]he adoption of a negative declaration … has a terminal effect on the environmental review process" by allowing the agency to dispense with the duty to prepare an EIR, negative declarations are allowed only in cases where there is not even a "fair argument" that the project will have a significant environmental effect.[16]

"Substantial evidence" under the fair argument standard means "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached."[17] In cases where it's uncertain whether substantial evidence exists regarding a project's potential environmental effects, the lead agency must consider expert opinion and facts.[18] If there is disagreement among experts about the significance of an effect on the environment, the lead agency must treat the effect as significant and prepare an EIR.[19]

The City's decision to prepare an ND violates CEQA because there is substantial evidence supporting a fair argument that the Project has significant, unmitigated environmental impacts. Given the deficiencies identified below, the City must prepare an EIR which discloses, analyzes, and mitigates all the Project's potentially significant air quality, noise, and public health impacts.

A. The ND Fails to Adequately Describe Baseline Noise Conditions

Under CEQA, a project is considered to have a potentially significant effect on the environment if it may cause "substantial, or potentially substantial, adverse change in the environment."[20] To evaluate such effects, the lead agency typically uses the existing physical conditions at the time environmental review begins as the baseline for assessing environmental impacts.[21] When a proposed project involves the alteration or expansion of existing activities, the environmental analysis must focus on the incremental effects of the proposed changes compared to the actual, existing operations on the ground, not hypothetical conditions allowed under

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[14] Pub. Res. Code § 21064; CEQA Guidelines § 15371.
[15] *See* Pub. Res. Code § 21080(c)(2); CEQA Guidelines § 15063.
[16] *Citizens of Lake Murray v. San Diego* (1989) 129 Cal.App.3d 436, 440; Pub. Res. Code §§ 21100, 21064.
[17] CEQA Guidelines § 15384(a).
[18] *Id.* § 15064(g).
[19] *Ibid.*
[20] Pub. Res. Code § 21068; see also CEQA Guidelines § 15382.
[21] CEQA Guidelines § 15125.

existing permits.[22] This ensures that the environmental review accurately reflects the real-world conditions and avoids overstating baseline activity levels in a way that could understate project impacts.[23]

The ND fails to accurately disclose baseline noise conditions at the Project site, which is adjacent to several residences.[24] The ND identifies ambient noise levels based on 15-minute sample measurements taken at six locations near single-family residences west of the Project site.[25] The measurements were conducted on a single weekday morning.[26] The information provided in the ND about baseline noise conditions at the Project site is incomplete and unsupported for two primary reasons.

First, the ND's short-duration sampling failed to capture the full variability of ambient noise, particularly for traffic and rail-related sources, which fluctuate significantly throughout the day and week.[27] As explained by Ms. Toncheva, a 15-minute measurement taken during mid-morning hours represents only a narrow temporal window and cannot reasonably approximate average conditions or reasonably foreseeable scenarios.[28] Moreover, the 15-minute samples account for only 2% of the both the allowable weekday construction hours and the typical 16-hour span of weekday operations.[29] This minimal sampling duration is not representative of the noise environment during the periods when construction and operational activities, and therefore potential noise impacts, will actually occur.[30] As a result, the ND's conclusions regarding baseline conditions and potential impacts are based on incomplete information, and are therefore unreliable and underestimate actual noise exposure.

Second, the ND fails to consider that the Project's expanded operations will occur on Saturdays, a day not included in the ambient noise sampling.[31] Noise levels on Saturdays may increase adverse effects on adjacent residents, and differ substantially from weekday conditions due to changes in traffic patterns, train

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[22] *El Dorado County Taxpayers for Quality Growth v. County of El Dorado* (2004) 122 Cal.App.4th 1591; *Communities for a Better Env't v. South Coast Air Quality Mgmt. Dist.* (2010) 48 Cal.4th 310.
[23] *Communities for a Better Env't v. South Coast Air Quality Mgmt. Dist.* (2010) 48 Cal.4th 310.
[24] ND, pp. 7-9.
[25] ND, appen. F at p. 5.
[26] *Ibid.*
[27] Toncheva Comments at p. 3.
[28] *Ibid.*
[29] *Ibid.*
[30] *Ibid.*
[31] *Ibid.*

schedules, and local activity levels.[32] By not accounting for this additional noise or disclosing ambient weekend noise conditions, the ND overlooks potentially significant noise impacts on nearby sensitive receptors during weekend operations.[33] This omission further undermines the adequacy of the environmental analysis and violates CEQA's requirement to consider the full scope of potential impacts associated with the proposed Project.

B. An EIR Is Required to Address Potentially Significant Air Quality and Public Health Impacts

1. The ND Improperly Relies on Localized Significance Thresholds to Conclude that Health Impacts from Exposure to Diesel Particulate Matter Are Less than Significant

Under CEQA, a lead agency may rely on thresholds of significance recommended by other public agencies, provided that the decision is supported by substantial evidence.[34] When applying such thresholds, the lead agency must explain how compliance demonstrates that the environmental impact would be less than significant.[35] Even where the agency relies on such a threshold, it must still consider substantial evidence indicating that the impact may be significant notwithstanding compliance with the selected threshold.[36]

The ND concludes that construction-related emissions of DPM would be less than significant based solely on the Project's estimated $PM_{2.5}$ emissions falling below localized significance thresholds ("LST").[37] This conclusion is legally deficient and scientifically flawed.

LSTs were developed by the SCAQMD as a tool to assess the localized short-term impacts of criteria pollutants – such as nitrogen oxides, carbon monoxide, and particulate matter ("PM_{10}" and "$PM_{2.5}$") – on ambient air quality.[38] These thresholds are based on dispersion modeling and ambient air quality standards and

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[32] *Ibid.*
[33] *Ibid.*
[34] CEQA Guidelines § 15064.7(c).
[35] *Id.* § 15064(b)(2); see *League to Save Lake Tahoe Mtn. Area Preservation Found. v. County of Placer* (2022) 7 Cal.5th 63, 105-06.
[36] CEQA Guidelines § 15064(b)(2).
[37] ND at p. 26.
[38] South Coast Air Quality Management District, Final Localized Significance Threshold Methodology (July 2008) p. 1-1, *available at* https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=8c641d61_2.

are intended to prevent exceedances of federal and state air quality standards for criteria pollutants.[39] Critically, LSTs were not designed to evaluate TACs, such as DPM, which are associated with long-term carcinogenic and chronic health risks.[40] LSTs do not account for cancer risk, proximity to sensitive receptors, duration of exposure, or cumulative impacts, factors that are essential to evaluating TAC-related risks under CEQA.

Compounding this deficiency, the ND ignores SCAQMD's adopted thresholds of significance for TACs, including DPM. According to SCAQMD's TAC thresholds, TAC emissions may result in a significant impact if: (1) the maximum incremental cancer risk exceeds 10 in one million, (2) the cancer burden exceeds 0.5 excess cancer cases in the population, or (3) the acute or chronic hazard index exceeds 1.[41] Quantified health risk analyses ("HRAs") that evaluate compliance with these thresholds are typically prepared in accordance with the Office of Health and Human Hazard Assessment's ("OEHHA") *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments.*[42] The ND does not include such an assessment and therefore fails to apply the appropriate methodology for evaluating DPM-related health risks.[43]

In addition, the ND's reliance on $PM_{2.5}$ as a proxy for DPM is inappropriate. While DPM is a subset of $PM_{2.5}$, it consists specifically of particulate emissions from diesel engines and contains a unique mixture of elemental carbon, toxic organic compounds, and trace metals.[44] Unlike $PM_{2.5}$, DPM is classified by the California Air Resources Board as a TAC, and the U.S. Environmental Protection Agency identifies it as a likely human carcinogen.[45] Unlike $PM_{2.5}$, DPM is specifically linked to elevated cancer risks, respiratory illness, and disproportionate health impacts in vulnerable communities.[46] By relying solely on PM2.5 emissions and

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[39] *Ibid.*
[40] *Ibid.*
[41] South Coast Air Quality Management District, Air Quality Significance Thresholds (Mar. 2023), *available at* https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25.
[42] Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program: Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments (Feb. 2015), *available at* https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf.
[43] Clark Comments at p. 4.
[44] *Ibid.*
[45] 17 C.C.R. § 93000; U.S. Environmental Protection Agency, Integrated Risk Assessment Information System: Diesel Engine Exhaust (Feb. 28, 2023), *available at* https://iris.epa.gov/static/pdfs/0642_summary.pdf.
[46] California Air Resources Board, Overview: Diesel Exhaust & Health, https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-

ignoring the unique toxicology profile of DPM, the ND omits necessary evaluation of the Project's potential to result in significant impacts. This omission is particularly concerning given the elevated TAC exposure levels and documented environmental justice concerns in the surrounding community.

Accordingly, the ND relies on an inapplicable threshold which fails to provide substantial evidence to support its conclusion that air quality and public health impacts from DPM emissions and exposure would be less than significant. This omission triggers the need for a full EIR that includes a quantitative HRA to evaluate the cancer risk, chronic exposure, and cumulative impacts from DPM emissions generated by Project construction activities. Without such analysis, the ND is legally deficient under CEQA.

2. The ND Fails to Analyze Cumulative Air Quality Impacts

Under CEQA, a lead agency must prepare an EIR if a project's environmental effects, while individually limited, are cumulatively considerable.[47] This determination requires the agency to answer two questions: (1) whether the cumulative impact itself may be significant, and (2) whether the project's incremental contribution to that cumulative impact is "cumulatively considerable."[48] "Cumulatively considerable" means that the incremental effects of a project are significant when viewed in connection with the effect of past projects, other projects, and probable future projects.[49]

The ND fails to meet this standard because its discussion of cumulative air quality impacts is conclusory and legally deficient. The ND summarily asserts that the Project will not result in significant cumulative air quality impacts because it does not exceed SCAQMD thresholds for criteria pollutants.[50] However, as noted above, SCAQMD has established separate and distinct significance thresholds for TACs. Reliance solely on criteria pollutant thresholds is therefore misplaced and insufficient.[51]

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health#:~:text=DPM%20has%20a%20significant%20impact%20on%20California's,toxics%20in%20California%20is%20attributable%20to%20DPM (last visited May 27, 2025).

[47] Pub. Res. Code § 21083(b); CEQA Guidelines § 15064(h)(1), 15063(a)(3).

[48] *Ibid.*

[49] Pub. Res. Code § 21083(b)(2); CEQA Guidelines § 15064(h)(1), 15063(a)(3); *see San Bernardino Valley Audubon Soc'y v. Metropolitan Water Dist.* (1999) 71 Cal.App.4th 382, 398 (EIR required for habitat conservation plan in part because initial study di not adequately explain why cumulative adverse effects to endangered species would not occur).

[50] ND at p. 27.

[51] The City may also attempt to rely on SCAQMD's previous cumulative impact threshold which assumed that cumulative impacts would not be significant

Moreover, SCAQMD is currently updating its guidance on cumulative impact analysis for TACs in response to widespread community concerns about elevated health risks.[52] In its most recent working group, SCAQMD outlined a two-step process for evaluating whether a projects cancer risk is "cumulatively considerable".[53] Agencies must first identify background cancer risks in the project area using SCAQMD's MATES V.[54] If the background risk exceeds the 90th percentile, SCAQMD recommends applying an initial cancer risk significance threshold of 3 in one million.[55]

Agencies must then assess whether the project meets any additional stringency criteria, such as a high volume of diesel traffic or proximity to a health-sensitive population.[56] Health sensitive populations include communities designated under SB 535 (disadvantaged communities) or AB 617 (air quality priority communities).[57] If either criterion applies, the initial threshold should be adjusted.[58]

The ND entirely omits this framework. It fails to disclose the background cancer risks in the project area, does not analyze proximity to health-sensitive communities, and offers no evaluation of whether the project's contribution to cancer risks exceeds either initial or adjusted thresholds. This omission is particularly troubling given that the surrounding community already experiences disproportionate exposure to air pollution,[59] a fact that heightens the need for rigorous cumulative impact analysis.

Additionally, the ND dismisses the potential for overlapping impacts from foreseeable future projects as speculative.[60] This assertion is unsubstantiated and

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[52] Clark Comments at p. 5; *see also* South Coast Air Quality Management District, CEQA Policy Development (NEW), https://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new) (last visited May 27, 2025).
[53] Clark Comments at p. 5; South Coast Air Quality Management District, Working Group Meeting #6: Cumulative Impacts from Air Toxics for CEQA Projects (Nov. 6, 2024) (hereinafter "SCAQMD Working Group Meeting #6"), *available at* https://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-6-20241106.pdf?sfvrsn=405a8561_13.
[54] Clark Comments at p. 5; SCAQMD Working Group Meeting #6 at p. 21.
[55] Clark Comments at p. 6; SCAQMD Working Group Meeting #6 at p. 21.
[56] *Ibid.*
[57] *Ibid.*
[58] *Ibid*
[59] Clark Comments at pp. 5-6.
[60] ND at p. 27.

contrary to CEQA's requirement for proactive, good faith analysis.[61] The identification of reasonably foreseeable future projects is standard expectation under CEQA and cannot be avoided by a lack of effort or data collection. CEQA does not permit agencies to create analytical infeasibility through inaction.[62] Rather, agencies must utilize the best information available to assess cumulative impacts and cannot defer meaningful analysis under the guise of speculation.[63]

The ND fails to meaningfully analyze the Project's cumulative impacts, resulting in a legally inadequate air quality analysis. The ND fails to utilize adopted thresholds or relevant SCAQMD guidance, ignores known health risks in the Project vicinity, and does not support its conclusions with substantial evidence. Accordingly, the City lacks substantial evidence to support the ND's conclusion that the Project would not result in significant cumulative impacts. The City must prepare an EIR to evaluate these potentially significant cumulative impacts.

3. Substantial Evidence Supports a Fair Argument the Project May Result in Significant Cancer Risk from Exposure to Construction DPM Emissions

Dr. Clark performed an independent evaluation of the Project's cancer risks associated with the Project's construction-related DPM emissions using the SCAQMD's cumulative risk assessment framework. He concludes DPM emissions and the resulting health impact from exposure are potentially significant.[64] First, using SCAQMD's methodology, Dr. Clark determined that the initial cumulative cancer risk significance threshold applicable to the Project would be 3 in one million, based on background cancer risk levels in the Project area.[65] According to MATES V, the Project site falls within the top 2% of the communities most impacted by TACs in the region – well above the 90th percentile benchmark used to trigger the more stringent 3 in one million threshold.[66]

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[61] CEQA Guidelines §§ 15144, 15151; *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376; *California Oak Found. v. Regents of Univ. of Cal.* (2010) 188 Cal.App.4th 227, 269; *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 428.
[62] CEQA Guidelines § 15144; *Rodeo Citizens Ass'n v. County of Contra Costa* (2018) 22 Cal.App.5th 214, 226.
[63] *Ibid.*
[64] Clark Comments at pp. 7-11.
[65] *Id.* at pp. 5-6.
[66] *Id.* at p. 5.

Second, SCAQMD recommends adjusting this threshold downward if the Project is in a vulnerable community or involves significant diesel truck activity.[67] In this case, the Project site is in both a SB 535-designated disadvantaged community and an AB 617 community.[68] Under SCAQMD's framework, the presence of these environmental justice indicators necessitates reducing the cumulative significance threshold from 3 in one million to 1 in one million to better protect already overburdened populations.[69]

Third, and most critically, Dr. Clark's analysis found that the Project's estimated cancer risk from DPM emissions during construction is 2.27 in one million, exceeding the adjusted 1 in one million thresholds.[70] This conclusion was based on SCAQMD's cumulative impact assessment framework, and standard risk assessment modeling, including emissions estimates, receptor proximity, and accepted dispersion modeling protocols.[71] Dr. Clark's conclusion that health risk from exposure to DPM emissions would exceed this threshold, especially in a community already experiencing disproportionate environmental burdens, constitutes substantial evidence supporting a fair argument that the Project may result in significant health impacts. Therefore, the City must prepare an EIR to fully evaluate and mitigate the Project's potentially significant cancer risks.

4. The ND Underestimates Operational Emissions

The ND's discussion of operational air quality impacts is fundamentally flawed and cannot be relied upon to support a less than significant finding. The air quality modeling fails to account for several key operational sources of DPM, thereby severely underestimating the Project's contribution to air quality degradation and associated public health risks.

First, the CalEEMod data omits emissions from transport refrigeration units ("TRUs), which are significant sources of DPM at cold storage facilities like the Project.[72] TRUs are commonly diesel-powered and often operate for extended periods during loading and unloading.[73] Excluding these emissions ignores a substantial source of operational DPM that can contribute to localized cancer risks and cumulative air quality impacts. Second, the analysis fails to quantify emissions from cargo handling equipment, such as yard trucks, forklifts, or top picks, which

[67] *Id.* at pp. 6-7.
[68] *Ibid.*
[69] *Id.* at p. 7.
[70] *Id.* at p. 11.
[71] *Id.* at pp. 7-11.
[72] *Id.* at p. 12.
[73] *Ibid.*

are commonly used at cold storage facilities.[74] There is no indication of baseline or future operational emissions associated with this equipment category, despite its routine use in moving goods on-site.[75] The omission of cargo handling equipment from the model represents a significant analytical gap. Third, the model fails to include emissions from the facility's stationary fire pump.[76] Fire pumps are typically tested monthly and during annual performance checks, and their diesel engines contribute to both DPM and nitrogen oxide emissions.[77] The omission of this source further undermines the integrity of the modeling results.

Collectively, these emissions render the operational emissions estimates incomplete and unreliable. By failing to disclose and analyze all substantial sources of operational air emissions, the ND does not meet CEQA's standard for a good faith effort at full disclosure.[78] Without a complete inventory of emission sources, the City cannot accurately evaluate the Project's air quality impacts or determine whether feasible mitigation is required. Consequently, the ND cannot support the finding of no significant impact, and an EIR must be prepared.

C. Substantial Evidence Supports a Fair Argument that an EIR Is Required to Address Potentially Significant Noise Impacts

1. The ND's Noise Modeling Contains Unsupported Assumptions

The ND and its supporting noise study contain significant analytical flaws that undermine the validity of the conclusions regarding construction noise impacts. First, the noise analysis fails explain how the distances between construction activities and nearby residential receptors were determined for use in the noise modeling.[79] The study assumes specific distances between equipment and sensitive receptors but does not disclose the methodology used to derive these distances.[80] More critically, the ND does provide any empirical evidence – such as site-specific measurements, scaled plans, or verified mapping data – to confirm the distances used in the noise model accurately reflect the actual proximity of the Project site to nearby residential receptors.[81]

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[74] Clark Comments at pp. 12-13.
[75] *Id.* at p. 13.
[76] *Id.* at p. 14.
[77] *Ibid.*
[78] *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376; *California Oak Found. Regents of Univ. of Cal.* (2010) 188 Cal.App.4th 227, 269.
[79] Toncheva Comments at p. 4.
[80] *Ibid.*
[81] *Ibid.*

Second, there are notable discrepancies between the modeled noise levels presented in the underlying data and the levels reported in the ND and noise study narrative.[82] The differences between these figures are not explained or reconciled, raising concerns about the internal consistency and reliability of the noise analysis.[83] These discrepancies suggest that the analysis may have selectively or inaccurately represented noise levels, thereby mischaracterizing the potential impact of construction activities on nearby sensitive receptors.

Taken together, the absence of transparent distance justification and the inconsistencies in reported noise levels result in a fundamentally flawed noise analysis that appears to significantly underestimate actual impacts. As a result, the ND fails to provide substantial evidence to support a less than significant finding for construction noise impacts.

2. The ND's Reliance on a High Absolute Threshold for Construction Noise Impacts Does Not Reflect the Sensitivity of Affected Receptors

The ND contains a flawed impact assessment based on an inappropriate significance threshold. Specifically, Ms. Toncheva's analysis demonstrates that the data show significant noise impacts when established Federal Transit Administration noise thresholds or prior City-adopted guidance are applied.[84] In contrast, the ND concludes that the impact is less than significant impact only by relying on an absolute 80 dBA threshold – an approach that is inconsistent with standard noise assessment practices,[85] and with CEQA's requirement to assess the increase over ambient noise levels when assessing significance. The courts have held that reliance on a maximum noise level as the sole threshold of significance for noise impacts violates CEQA because it fails to consider whether the magnitude of changes in noise levels is significant.[86] The City's methodology fails to account for the sensitivity of affected receptors or the cumulative nature of the noise environment, thereby understanding the Project's true noise impacts.[87]

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[82] *Ibid.*
[83] *Ibid.*
[84] *Id.* at pp. 4-5.
[85] *Id.* at pp. 4-5.
[86] *King & Gardiner Farms, LLC,* 45 Cal.App.5th at 865.
[87] Toncheva Comments at pp. 4-5.

3. Substantial Evidence Supports a Fair Argument that Construction Noise Impacts Are Significant and Unmitigated

In addition to adopting an absolute 80 dBA threshold for evaluating construction noise, it fails to apply the City's recommended methodology for assessing such impacts.[88] Ms. Toncheva provides a detailed calculation of the 8-hour equivalent continuous noise level (Leq) for the nosiest activity: demolition.[89] Using a center-of-site distance of 195 feet, and a residential receptor distance of 60 feet (based on Ms. Toncheva's independent review and 85 feet (based on the ND's own vibration analysis), Ms. Toncheva calculates an 8-hour Leq of 82 dBA for demolition activity.[90] This figure exceeds the ambient noise levels by 11 dB, violates the Los Angeles Municipal Code threshold, and surpasses the 80-dBA absolute threshold.[91]

These results – grounded in the City's own prescribed methodology – constitute substantial evidence of a potentially significant noise impact. Under CEQA, when expert opinion or data raises a fair argument that a project may have a significant impact, an EIR is required.[92] Here, Ms. Toncheva's analysis satisfies that standard. Accordingly, the City must prepare an EIR to fully evaluate and mitigate construction noise impacts.

4. The ND Fails to Demonstrate the Project Would Comply with Applicable Construction Noise Standards

Compliance with applicable regulatory standards may support a finding that a project will not result in significant environmental impacts.[93] However, such a conclusion must be based on a project-specific analysis that demonstrates how compliance will effectively avoid or reduce those impacts.[94] While adherence to specific laws, regulations, or permit requirements can, in some cases, constitute adequate mitigation under CEQA, reliance on regulatory compliance is only appropriate where substantial evidence shows that compliance will, in practice,

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[88] *Id.* at p. 6.
[89] *Ibid.*
[90] *Ibid.*
[91] *Ibid.*
[92] CEQA Guidelines § 15064(g); *City of Carmel-by-the-Sea v. Board of Supervisors* (1986) 183 Cal.App.3d 229, 24; *Clews Land & Livestock v. City of San Diego* (2017) 19 Cal.App.5th 161, 192.
[93] *Tracy First v. City of Tracy* (2009) 177 Cal.App.4th 912.
[94] *Save Our Capitol! v. Department of Gen. Servs.* (2023) 87 Cal.App.5th 655, 696; *Californians for Alternatives to Toxics v. Department of Food & Agric.* (2005) 136 Cal.App.4th 1.

reduce the impact below a level of significance.[95] This determination requires a detailed analysis of both anticipated environmental impact and the effectiveness of the regulatory measure, considered in the context of applicable performance standards and oversight mechanisms.[96]

The ND is deficient because it fails to demonstrate that the proposed Project would comply with applicable local noise ordinances governing construction activities. Specifically, Los Angeles Municipal Code § 112.05 prohibits construction equipment noise from exceeding 75 dBA at 50 feet between the hours of 7am and 10pm when such activities occur near any residential zone. Neither the ND nor the accompanying noise study acknowledge the applicability of this ordinance to the Project.[97] This omission is significant because CEQA requires a lead agency to evaluate whether a project would result in a significant impact based on noncompliance with applicable standards or regulations, including local noise ordinances.[98]

Moreover, the ND provides no substantial evidence demonstrating that the Project would comply with this 75 dBA threshold.[99] To the contrary, the study submitted as Appendix F indicates that anticipated construction noise levels would exceed this threshold.[100] The failure to disclose this exceedance or to propose feasible mitigation measures renders the ND inadequate under CEQA.

5. The ND Fails to Adequately Analyze Compliance with Regulatory Standards Governing Fixed Mechanical Equipment

The ND acknowledges that the Project would introduce various stationary noise sources, including heating, ventilation, and air conditioning ("HVAC") systems.[101] It further asserts that all mechanical equipment would be required to incorporate appropriate noise-control devices to ensure compliance with Los Angeles Municipal Code § 112.02, which prohibits noise from such equipment from causing an increase in ambient noise level of more than 5 dBA.[102] However, the ND's analysis is legally and substantively inadequate.

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[95] CEQA Guidelines § 15126.4(a)(1)(B); see *Save Our Capitol! v. Department of Gen. Servs.* (2023) 87 Cal.App.5th 655, 687-88, 699.
[96] *Tiburon Open Space Comm. v. County of Marin* (2022) 78 Cal.App.5th 700, 763.
[97] Toncheva Comments at p. 5.
[98] CEQA Guidelines, Appendix G, Section XIII.
[99] Toncheva Comments at p. 5.
[100] *Ibid.*
[101] ND at p. 79-80.
[102] *Id.* at p. 80.

Specifically, the ND does not evaluate whether stationary noise sources located near residential receptors would, in fact, exceed the 5 dBA threshold over existing ambient noise levels.[103] Simply asserting that equipment will comply with code requirements, without a site-specific analysis or supporting technical data, does not satisfy CEQA's requirement to disclose and analyze potential significant impacts. In the absence of detailed noise modeling or empirical evidence demonstrating compliance, the ND improperly defers analysis and mitigation. An EIR is required to identify equipment locations, quantify projected noise levels at the nearest property lines, and evaluate the potential for exceedances above ambient levels in accordance with applicable noise standards.

6. The ND Fails to Adequately Analyze Noise Impacts from Truck and Dock Activity

The ND fails to adequately analyze the noise impacts associated with increased truck activity, both on-site and off-site. Notably, the document omits any discussion of the increased traffic along Drumm Avenue, particularly because of the proposed extension of operational hours into Saturdays.[104] This expansion will lead to increased truck traffic during weekend hours, yet the ND does not assess the potential noise effects on nearby sensitive receptors.[105]

In addition, the ND fails to consider noise generated from on-site dock operations. The ND acknowledges that ambient levels are already elevated near residences adjacent to the existing cold dock.[106] However, the proposed Project would relocate the dock closer to these homes and extend its operations into Saturdays – both of which are likely to increase noise exposure for nearby residents.[107] Despite these changes, the ND offers no meaningful analysis of the potential noise increases from this new configuration.[108]

Furthermore, ambient noise levels were not properly established over the weekend, when the extended operational hours would occur.[109] Without weekend baseline measurements, the ND cannot accurately evaluate the Project's impact on the acoustic environment during the times when the greatest changes are proposed. As a result of these omissions, the ND does not provide substantial evidence to support the conclusion of a less than significant impact.

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[103] Toncheva Comments at p. 7.
[104] *Ibid.*
[105] *Ibid.*
[106] *Ibid.*
[107] *Ibid.*
[108] *Ibid.*
[109] *Ibid.*

III. THE CITY CANNOT MAKE THE NECESSARY LAND USE FINDINGS DUE TO SIGNIFICANT, UNMITIGATED PUBLIC HEALTH AND ENVIRONMENTAL IMPACTS

The proposed Project is seeking the following approvals from the City: (1) a General Plan Amendment, (2) a Zone Change, (3) a Zoning Administrator Determination, (4) a Site Plan Review, and (5) a Waiver of Dedication and Improvements. The City cannot lawfully make the required findings to approve these entitlements because the Project would result in significant, unmitigated public health and environmental impacts

To approve the requested entitlements, the City must determine that the Project substantially conforms to the purposes, intent, and provision of the General Plan, appliable Community Plan, and any Specific Plan; is consistent with public necessity, convenience, general welfare, and good zoning practice, and that its features – such as building height, size, and operations – are compatible with the surrounding development and will not adversely affect public health, welfare, or safety.[110] Additionally, approval of a transitional height change requires findings that the project enhances the built environment or provides a beneficial service, will not degrade adjacent properties or public welfare, and is compatible with the scale and character of the neighborhood.[111] Similarly, Site Plan approval requires findings of compatibility with existing and future development and appropriate arrangement of buildings, structures, and supporting improvements.[112] Finally, to approve the requested Waiver of Dedication and Improvements, the City must find that the dedication or improvement either lacks a reasonable relationship to project impacts, is unnecessary to meet long-term mobility needs, or is physically impractical.[113]

Given the Project's significant, unmitigated public health impacts, including those described in Section II,[114] these findings cannot be made. The Project's adverse effects on air quality, noise, and other environmental factors would directly conflict with key General Plan and the Wilmington – Harbor City Community Plan policies aimed at protecting public health and welfare including, but not limited to, Air Quality Element Policy 1.3.1, Noise Element Policy 2.2, P8, and P11, and

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[110] Los Angeles City Charter § 555; Los Angeles Municipal Code ("LAMC") §§ 11.5.6, 12.24.X.22(a), 12.32, 13B.1.4.E.1., 13B.2.1.E.1., 13B.2.4.E.
[111] LAMC § 12.24.X.22(a).
[112] *Id.* § 13B.2.4.E.
[113] *Id.* § 12.37.I.2(b).
[114] *See generally* Clark Comments (air quality and public health impacts); Toncheva Comments (noise impacts).

Community Plan Policy 3-1.4.[115] As such granting the requested approvals would be inconsistent with the General Plan and applicable community plan.

IV. CONCLUSION

Substantial evidence supports a fair argument that the Project may have a significant environmental effect, necessitating the preparation of an EIR. The defects with the ND's analysis of noise, air quality, and public health impacts underscore the potential for significant environmental impacts that have not been sufficiently addressed. Moreover, the City cannot make the required findings to approve the requested entitlements. Given these inadequacies, an EIR is necessary to thoroughly evaluate and mitigate the Project's environmental impacts, ensuring compliance with CEQA and the protection of the public and environmental health.

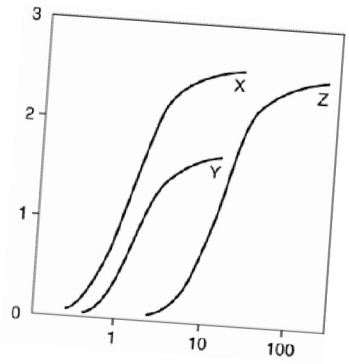
Sincerely,

Andrew J. Graf

Attachments
AJG:acp

[115] City of Los Angeles, Air Quality Element (2003), *available at* https://planning.lacity.gov/odocument/0ff9a9b0-0adf-49b4-8e07-0c16feea70bc/Air_Quality_Element.pdf; City of Los Angeles, Noise Element (1998), *available at* https://planning.lacity.gov/odocument/b49a8631-19b2-4477-8c7f-08b48093cddd/Noise_Element.pdf; City of Los Angeles, Wilmington-Harbor City Community Plan (2016), *available at* https://planning.lacity.gov/odocument/1fbe8e13-5c84-42cd-913e-5fc659a4241a/Wilmington-Harbor_City_Community_Plan.pdf.

ATTACHMENT A



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May 22, 2025

Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
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Attn: Mr. Andrew Graf

Subject: Comments On Draft Initial Study/Negative Declaration For KPAC Coil Avenue Freezer Expansion Project, Wilmington, CA (Case Number: ENV-2022-6860-ND)

At the request of Adams Broadwell Joseph & Cardozo (ABJC), Clark and Associates (Clark) reviewed materials related to Initial Study/Negative Declaration (ND) for the above-referenced Project.

Clark's review of the materials in no way constitutes a validation of the conclusions or materials contained within the plan. If we do not comment on a specific item this does not constitute acceptance of the item.

Project Description:

According to the ND, the proposed Project involves improvement and expansion of the existing cold storage facility which includes demolition and alteration of the 27,157 square foot existing cold dock for a new freezer. The new freezer would be approximately 71,331 square feet resulting in a net addition of 44,174 square feet of new floor area. The proposed Project would contain a maximum Floor Area Ratio (FAR) of 0.38:1 and would be 65 feet in height (not including rooftop equipment) which exceeds the 45-foot height limit currently allowed per the applicable zoning. Additionally, the existing interior freezer would be remodeled. The improved facility will be expanding to the west and would result in the removal of the existing portion of double rail spur that is located in the path of the expansion. Additionally, the proposed

development would include 2,290 square feet designated for the mechanical room expansion, electrical room expansion, and fire pump building and 13,939 square feet of total new second floor building area for the offices. Following the expansion, the facility would also operate on Saturdays for one 8-hour shift. The expansion would decrease the length of the existing double rail spur and would also decrease the number of trains unloading stations from 18 down to 6.

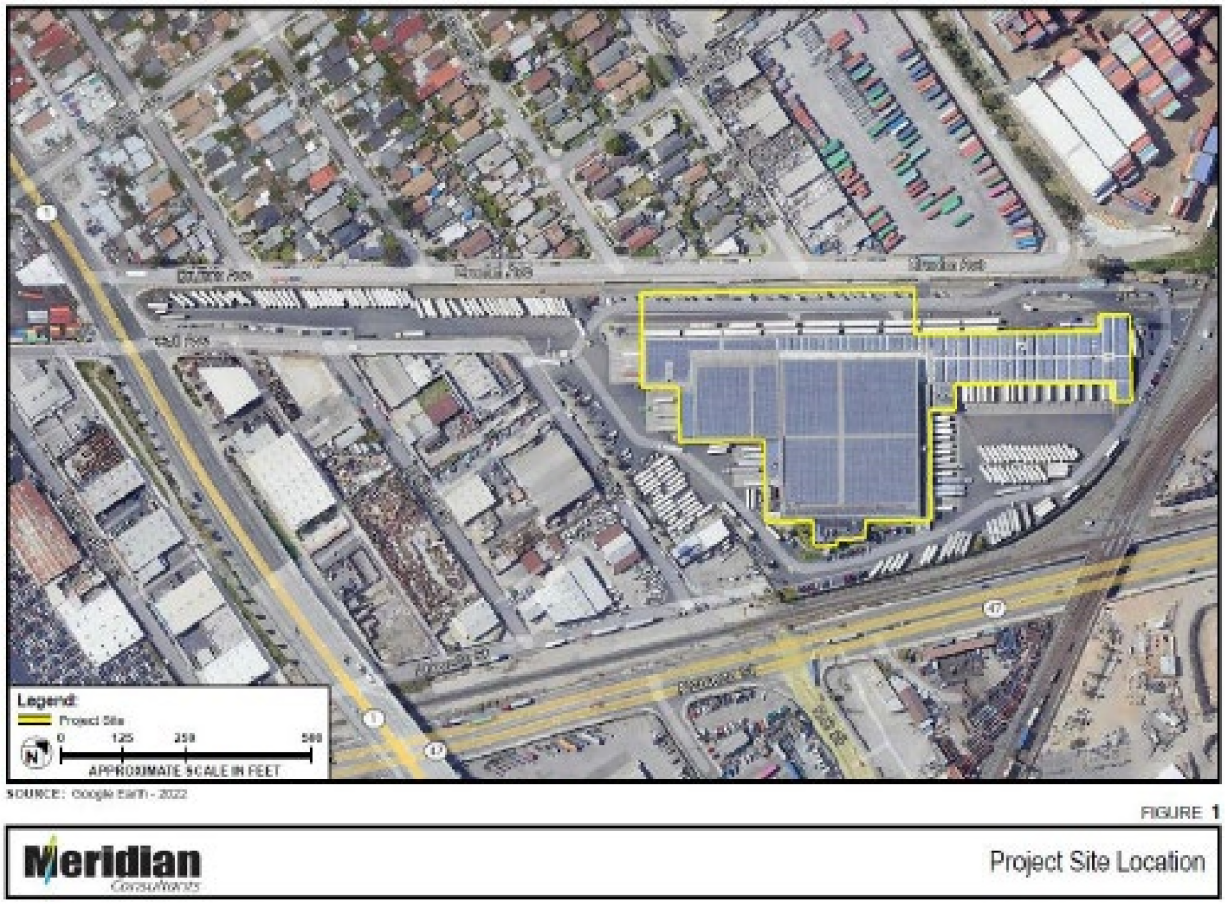

Figure 1: Project Site Location Map

The Project site is located at 1420 Coil Avenue within the Wilmington-Harbor Community Plan area in the City of Los Angeles (City). The Project site encompasses approximately 747,302 square feet (17.16 acres) and includes two zoning designations: [Q] MR2-1 VL-CUGU (Restricted Light Industrial) and [Q] M3-1VL-CUGU (Heavy Industrial). The site's land use designations include Light Manufacturing, Light Industrial, and Heavy Manufacturing. The Project site is currently developed with a one-story (varying heights between 26 to approximately 42 feet) 221,496 square foot

cold storage facility used to store wholesale food products for third party users. The facility currently provides cooler and freezer temperature storage and operates 5 days a week (Monday through Friday) for 16 hours per day, at a quantity of two 8-hour shifts. Additionally, there is an existing double rail spur that includes 9 unloading docks each, equating to 18 unloading stations. Properties surrounding the Project site are zoned M3-1VL, [Q]M3-1VL-CUGU and [Q]M3-1 (Heavy Industrial) to the north and east along Alameda Street, R1-1XL-O-CUGU (One-Family Residential) to the west along Drumm Avenue and [Q]C1-1VL-O-CUGU (Limited Commercial) to the southwest along Pacific Coast Highway.

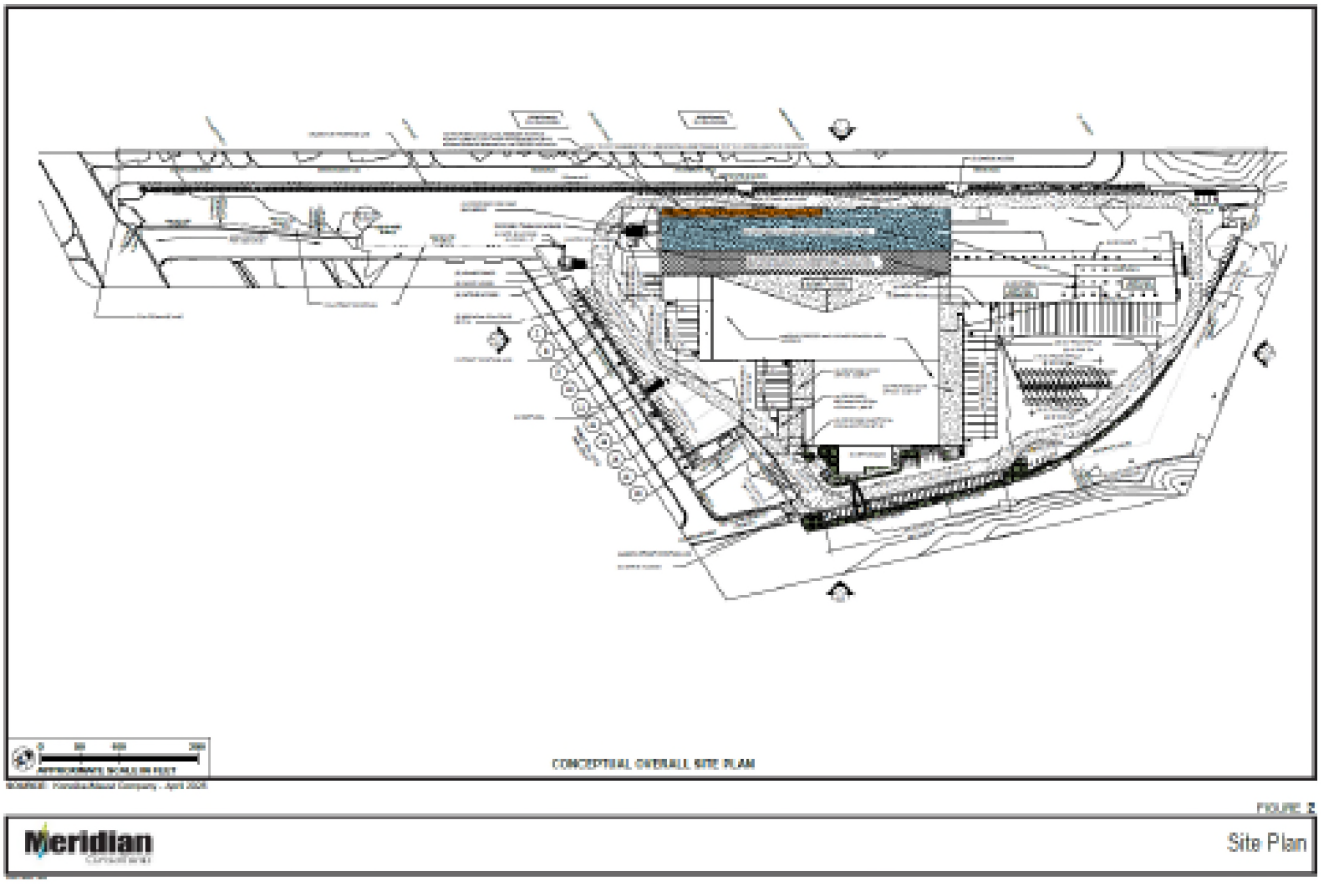

Figure 2: Proposed Project Site Plan

Based on the information contained in the ND it is clear that conclusions that the construction and operational phases of the Project will have no significant adverse impacts on the environment are not warranted. That conclusion is not born out in the data provided in the ND.

Specific Comments

1. **The Negative Declaration Fails To Analyze The Project's Health Impacts from Diesel Particulate Matter Emissions**

The ND lacks any quantitative or qualitative analysis of public health risks associated with the Project's construction or operation emissions. Notably, it does not identify any significance thresholds for toxic air contaminants (TACs), nor does it evaluate whether the Project's diesel particulate matter (DPM) emissions would exceed applicable significance thresholds.

SCAQMD has established project-level significance thresholds for TACs, including carcinogens and non-carcinogens. TAC emissions are potentially signfiiacnt if they meet one of the following conditions: (1) the maximum incremental cancer risk exceeds 10 in 1 million, (2) the cancer burden exceeds 0.5 excess cancer cases, and (3) the chronic or acute hazard index exceeds 1.0.[1] The ND does not mention these thresholds. Instead, the ND concludes the Project's DPM impacts from construction emissions are less than significant because PM2.5 emissions do not exceed SCAQMD's localized significance threshold.

First, health risks from TACs are typically evaluated in accordance with the Office of Health and Human Hazard Assessment's ("OEHHA") *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, not localized significance thresholds.[2] The manual recommends that even short-term projects, such as construction activities lasting more than 2 months, be evaluated for cancer risks.[3]

Second, PM2.5 emissions are not an adequate proxy for DPM. Diesel exhaust contains a range of inhalable particles including particles as large ten microns (PM10), and is a unique mixture of elemental carbon, toxic organic compounds, and trace metals. The CalEEMod model includes both emission estimates of PM10 from diesel exhaust and PM2.5 from diesel exhaust. Using the PM2.5 emissions underestimates the exposure point concentrations of emissions in the environment. In contrast, the use of the PM10 exhaust value as the source term for any analysis ensures the exposure point concentration is not underestimated since the PM10 value includes all particles equal to or less than 10 microns are included. Moreover, unlike PM2.5, DPM is specifically linked to elevated cancer

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[1] https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25.

[2] https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf.

[3] OEHHA Guidance Manual for Preparation of Health Risk Assessments, Pg. 8-17 to 8-18.

risks, respiratory illness, and disproportionate health impacts in vulnerable communities. By relying solely on PM2.5 emissions and ignoring the unique toxicology profile of DPM, the ND's evaluation of the potential health risks is inadequate.

For cumulative impacts, SCAQMD has initiated a public process to update existing guidance due to community concerns about high-risk health impacts from air toxics, particularly from aggregation of warehouses. Since 2022, SCAQMD has held six Working Group (WG) meetings to develop additional guidance for analyzing such potential impacts.[4] The first two WG meetings focused on Information Gathering and Analysis as well as the Initial Objective and Scope of the WGs. The third WG meeting was specific to the Initial Objective and Scope of the WGs and pushed into the Conceptual/Potential Cumulative Health Risk Assessment protocols. WG meetings #4 and #5 focused only on the Conceptual/Potential Cumulative Health Risk Assessment protocols. WG meeting #6 (WG 6), held in November of 2024, refined the proposed the Conceptual/Potential Cumulative Health Risk Assessment protocols based on public comments. The result of WG 6 was a draft process/analysis flow diagram which is intended to be used to inform the drafting of a planned Draft Guidance Document for conducting Cumulative Health Risk Assessments in the South Coast Air Basin.

Step 1 of the WG 6 process for determining the cumulative significance threshold is to identify the background cancer risk affecting the Project area via the SCAQMD Multiple Air Toxics Exposure Study (MATES).[5] According to SCAQMD's MATES V study, zip code 90744 (the location of the Project Site) has a cumulative cancer risk of 664 in 1 million placing it in the top 2% of communities in the South Coast Air Basin (SCAB) impacted by TACs. More than 66% of that risk is from exposure to DPM.

[4] https://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new).

[5] https://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-6-20241106.pdf?sfvrsn=405a8561_13.

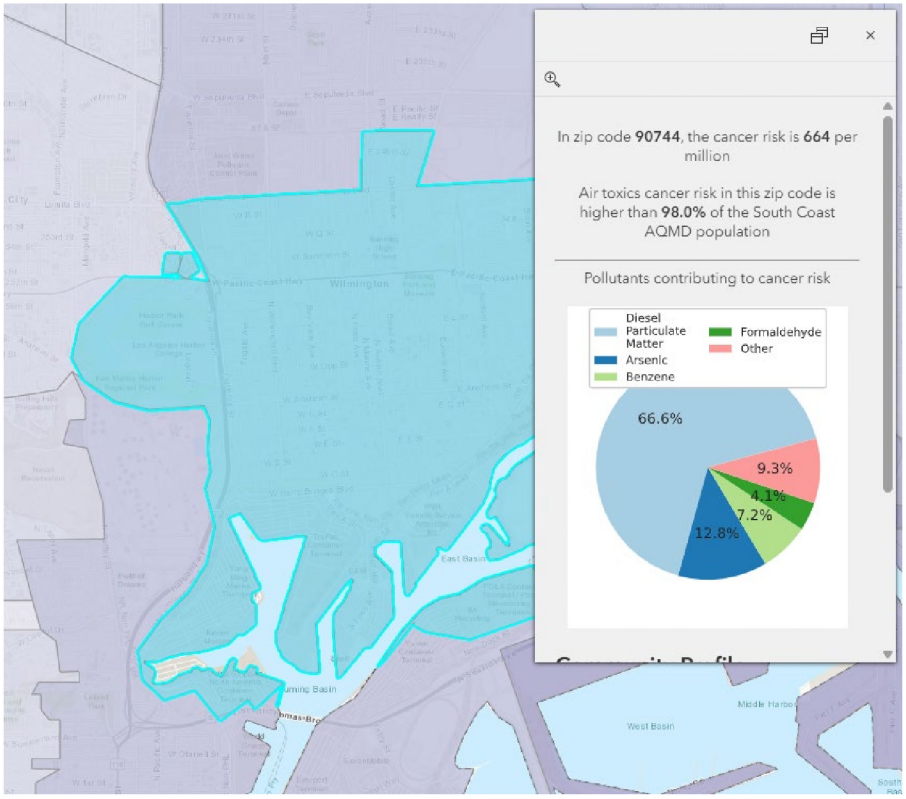

Figure 3: MATES Cancer Risk Analysis Of Project Location

Per WG 6, areas experiencing background excess cancer risk in the 90th percentile would result in a drop of the Cancer Risk Threshold from 10 in one million to 3 in one million. Because the zip code where the Project resides has an air toxics cancer risk higher than 98%, the initial threshold would be 3 in one million.

Step 2 of the WG 6 flow diagram is to determine whether one or more of the listed criteria is met causing an adjustment to the initial threshold. The additional criteria include an assessment of whether the project involves a high-volume of diesel-fueled trucks or is located within a health sensitive population. Here, the Project meets the second criteria because it is in both a SB 535 disadvantaged community and an AB 617 community.

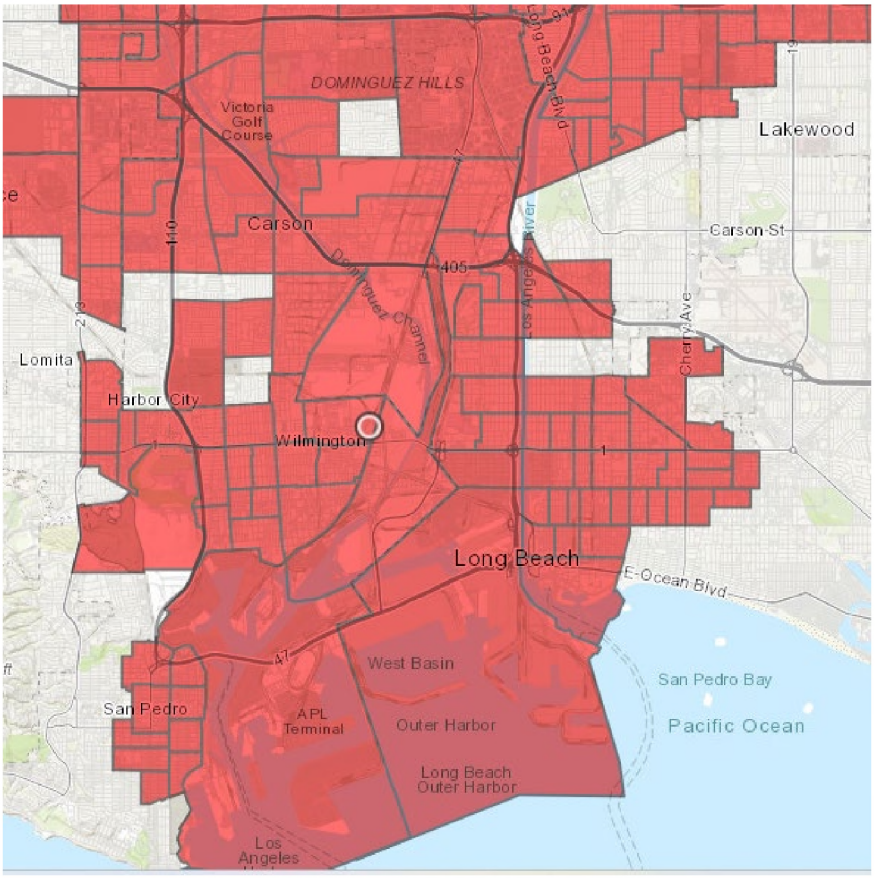

Figure 4: SB 535 Classification Of Port Area

Therefore, the Project's cumulative impacts should be evaluated against an adjusted cumulative cancer risk threshold of 1 in one million.

2. Using The CalEEMod Analysis Of The Construction Phase Of The Project It Is Clear That The Project's Emissions From Construction Equipment Will Exceed The 1 In One Million Health Risk Threshold Defined In Comment 1.

According to the Air Quality (AQ) Study,[6] "Construction emissions would not contribute to short- or long-term emissions that would increase the carcinogenic effects on sensitive receptors. Construction-source odor emissions would be temporary, short-term, and intermittent in nature and would not result in persistent impacts that would affect substantial numbers of people." The AQ Study goes on to identify a specific set of sensitive receptors near the Project Site. The receptors include:

[6] Meridian Consultants. 2024. Air Quality Study KPAC Coil Avenue Freezer Expansion Project. 1420 Coile Avenue, Wilmington, CA. 90074. Dated September 2024. Pg. 2

- Located at the corner of E. Sandison Street and Drumm Avenue, sensitive uses include the single and multi-family residential uses.
- Located at the corner of E. Cruces Street and Drumm Avenue, sensitive uses include single and multifamily residential uses.
- Located at the corner of E. O Street and Drumm Avenue, sensitive uses include single family residential uses.
- Located along Drumm Avenue between E. Colon Street and Pacific Coast Highway, sensitive uses include the multi-family residential uses.
- Located at the corner of E. Sandison Street and Gamble Avenue, sensitive uses include single- and multi-family residential uses.
- Located at the corner of E. Cruces Street and N. Binn Avenue, sensitive uses include single- and multi-family residential uses.

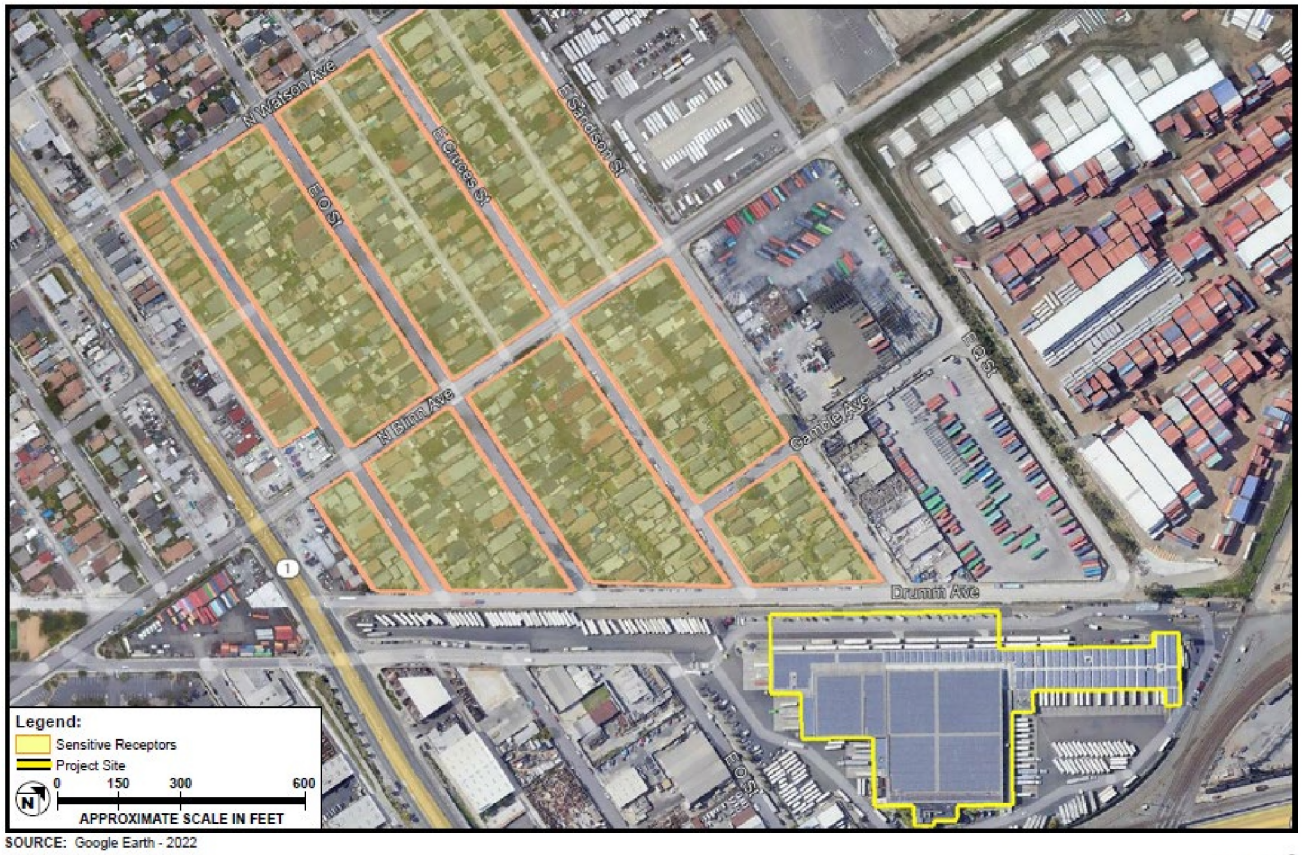

Figure 5: Sensitive Receptors Near Project Site

I will demonstrate that this conclusion is not supported by the evidence in the ND and AQ Study in light of the analysis presented in Comment 1. Using the details from Attachment A.2 (Proposed Construction Emissions) of the AQ Study, I constructed an air dispersion model of the emissions from the off-road equipment listed in the CalEEMod analysis and a health risk analysis for residents located in homes west of the Project Site that is consistent with OEHHA guidance .

I calculated DPM emissions based on the DPM_{10} Exhaust values disclosed in the CalEEMod file. Based on the average daily emissions of PM_{10} as exhaust (DPM) from tables 3.1 (demolition), 3.3 (grading), 3.5 (building construction), 3.7 (paving), and 3.9 (architectural coatings), I calculated the total emission of DPM for each phase of the project. In total, approximately 66 lbs of DPM is estimated to be released per day from the Project site over the duration of the construction phase, with most emissions occurring during the 10 months of building construction. Using the emission rate identified in the CalEEMOD model for each construction phase, the total amount of DPM emitted from off-road equipment is equal to the number of work days multiplied by the emission rate calculated in the CalEEMOD model.

$$DPM\ (lbs) = \sum Emission\ Rate\ \left(\frac{lbs}{day}\right) * Number\ Of\ Work\ Days\ (days)$$

Phase	Start	End	Daily Emissions*	Duration	Total Emissions For Phase	Emissions Per Day	Emission Rate Per Hour	Site Wide Annual Emission Rate
			lbs/day	days	lbs	lbs/day	lbs-hour	lbs-hr/ft2
Demolition	1/2/206	1/30/2026	0.03	20	0.6	**3.00E-02**	3.75E-03	**8.50E-08**
Grading	1/31/2026	2/9/2026	0.01	60	0.6	**1.00E-02**	1.25E-03	**2.83E-08**
Building Construction	2/10/2026	12/14/2026	0.22	292	64.24	**2.20E-01**	2.75E-02	**6.24E-07**
Paving	12/15/2026	12/28/2026	0.01	22	0.22	**1.00E-02**	1.25E-03	**2.83E-08**
Architectural Coating	12/15/2026	1/11/2027	0.0025	44	0.11	**2.50E-03**	3.13E-04	**7.09E-09**

* - Daily Average On-site Emissions From CalEEMOD Analysis

Assuming 8-hour workdays and an approximate area of 44,105 square feet (equal to the construction area), I calculated an average daily emission rate of 2.46 x 10^{-7} lbs of DPM per hour per square feet for the averaged source term in the air dispersion model. This average rate is much lower than the

maximum daily rate reported in the CalEEMod analysis in tables 3.1 through 3.9 and is therefore a conservative estimate of the daily emission rates.

The next step in the analysis is to input the source terms, location and type of the sources, the location of the existing building, and the sensitive receptors to be analyzed in the air dispersion model. I used a version of AERMOD, which is the U.S. EPA's and SCAQMD's preferred gaussian dispersion model for this type of analysis. AERMOD is an acronym for the American Meteorological Society/Environmental Protection Agency Regulatory Model Improvement Committee's Dispersion Model. AERMOD contains the necessary algorithms to model air concentrations from a wide range of emission source types, including stack-based point sources, fugitive area sources, and volume sources. The modeling domain with the building around the Project site are indicated in the figure below. The outline of the existing KPAC building is contained in the blue line, while the green lined area is the source area of DPM from construction of the Project.

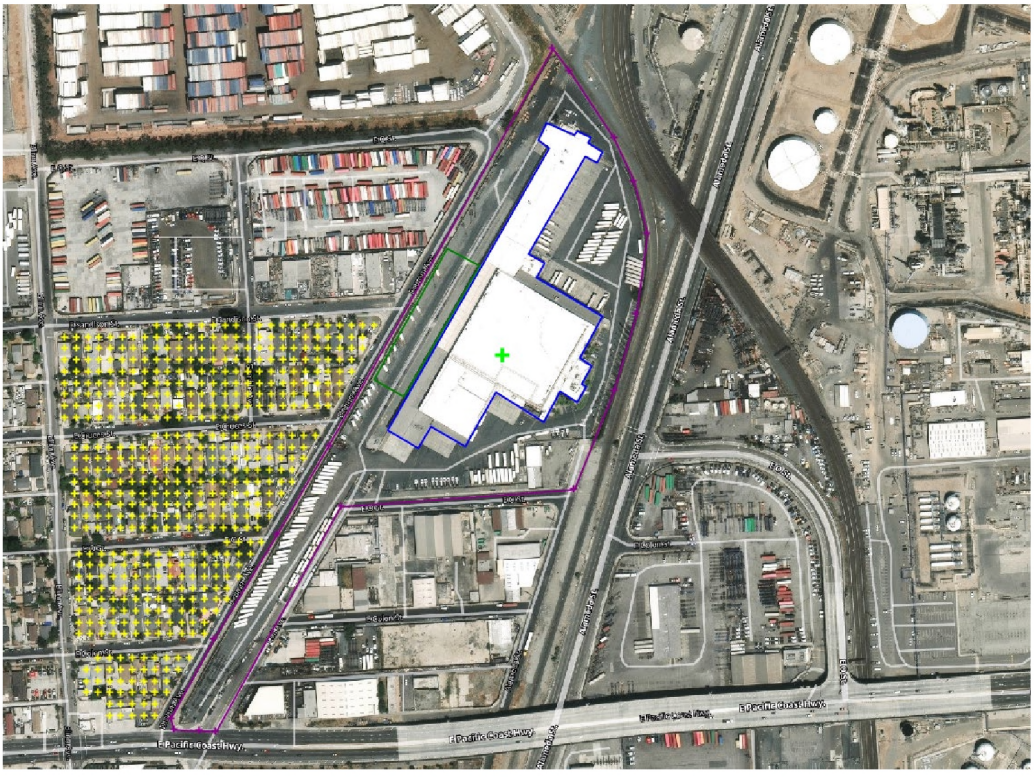

Figure 6: AERMOD Model Domain With Construction Source Area, Existing Building, & Sensitive Receptor Locations

The yellow crosses indicated the location of the sensitive receptors closest to the Project Site.

Next the elevation of each object in the model was obtained from the California Air Resources Board;s (CARB's) HARP Digital Elevation Model Files website. The Project Site is contained in the file for the Long Beach quad file. The resolution of the file is 10 meters by 10 meters. The model was then run using AERMAP, the U.S. EPA's AERMOD Terrain Preprocessor (AERMAP) software. AERMAP produces terrain base elevations for each receptor and source and a hill height scale value for each receptor. AERMAP outputs the elevation results in a format that can be directly inserted into an AERMOD control file.

Following the AERMAP run, I selected meteorological data from the SCAQMD's Data for AERMOD website.[7] Using the AERMET Files And HRA Tool html link embedded in the webpage I identified the source receptor area (SRA) for the Project Site. The SRA for 1420 Coil Avenue, is SRA 4 or Long Beach. Using the meteorological data from SCAQMD for the Long Beach monitoring station (closest met station to the Project site), limiting the emissions to an 8-hour period on weekdays, the concentrations at the residences immediate across the street from the Project site were calculated.

The output from the AERMOD model was then imported into an excel spreadsheet to identify the maximum exposure point concentration in the model domain. The maximum annual average concentration was calculated to be 0.01656 ug/m^3 and the averaged value across the whole model domain was 0.001409 ug/m^3.

Using the algorithm outlined in OEHHA's HARP 2 Standalone Risk software, the cancer risk for the maximally exposed individual resident was calculated. Using the maximum concentration modeled for residential receptors west of the Project Site, the cumulative risk is 2.27 in 1,000,000. This value is greater than the 1 in 1 million identified in Comment 1 above as being the cumulative threshold of significance based on the SCAQMD's new working group guidance. If the incremental operational impacts are included in the analysis, the cumulative cancer risk would be even higher given the longer duration of exposure. The results of the air model and the health risk analysis are attached as an exhibit to this letter.

3. The Air Quality Analysis Fails To Analyze For Transportation Refrigeration Units (TRUs) Onsite During Normal Operations.

The AQ Study fails to consider the use of Transport Refrigeration Units (TRUs) onsite. TRUs

[7] SCAQMD. 2025. https://www.aqmd.gov/home/air-quality/meteorological-data/data-for-aermod

are refrigeration systems powered by diesel internal combustion engines designed to refrigerate or heat perishable products that are transported in various containers, including truck vans, semi-truck trailers, and shipping containers. CARB defines diesel exhaust as a complex mixture of inorganic and organic compounds that exists in gaseous, liquid, and solid phases. CARB and U.S. EPA identify 40 components of the exhaust as suspected human carcinogens, including formaldehyde, 1,3-butadiene, and benzo[a]pyrene.

According to CalEEMod analysis of the Project's operational emissions provided in Appendix A.3, the Project is modeled as a refrigerated warehouse. The baseline CalEEMod analysis does not include the TRUs on trucks accessing the Project site. Furthermore, nowhere in the future operational CalEEMod analysis or in the air quality section of the ND are the emissions from the TRUs (primarily DPM) quantified. To account for the TRUs, the model would need to include a line item in the sources to include the TRUs. Without that line item, it is improper to assume that the DPM emissions are accounted for when the model type is designated as a refrigerated warehouse. Emissions from TRUs are not addressed in either the baseline or the future operational emission analysis.

Given that the IS/ND identified the warehouse as a refrigerated warehouse, it is therefore reasonable to conclude that TRUs are a foreseeable project component, even if the trucks entering the facility do so by appointment.[8] The TRU emissions have not been quantified, resulting in an underestimation of the foreseeable health risk to the community as well as the associated GHG emissions from the operation of the TRUs.

4. The Analysis of Operational Emissions Is Incomplete Since If Fails To Address The Use Of Cargo Handling Equipment Onsite.

According to the AQ Study, operational emissions were calculated using the CalEEMOD software assuming that Project will continue as a refrigerated warehouse. A review of CalEEMOD analysis shows that emissions from onsite service vehicles that may be used to move products from the warehouse area into the loading bays were not included in the analysis.

[8] Meridian Consultants. 2024. Air Quality Study KPAC Coil Avenue Freezer Expansion Project. 1420 Coile Avenue, Wilmington, CA. 90074. Dated September 2024. Pg. 9

According to the latest CAPCOA Guidance,[9] cargo handling equipment (e.g., forklifts, yard goats, and pallet jacks) may include diesel powered, compressed natural gas powered, and gasoline powered equipment. The CalEEMod baseline and the future operational reports do not include line items for cargo handling equipment onsite. If the cargo handling equipment is not electrified, then emissions from the cargo handling equipment are not accounted for in any of the emission estimates. The AQ Study is therefore missing a potentially significant source of criteria and toxic pollutants.

5. The CalEEMod Analysis For The Operational Phase Does Not Include Fire Pumps.

As noted in the AQ Study, "the proposed development would include 2,290 square feet designated for the mechanical room expansion, electrical room expansion, and fire pump building and 13,939 square feet of total new second floor building area for the offices." [10] Fire pumps are a source of DPM emission since they need independent power to work during power outages. The most common independent power source is a dedicated back-up generator (BUG). While there are electrically powered fire pumps on the market, the utility of the fire pumps is compromised when the power source is cut. The fire pump will need to be tested and maintained annually. Under the California Air Resources Board (CARB) Airborne Toxic Control Measure (ATCM) for Stationary Compression Ignition Engines Guidance, the District may allow a new stationary emergency standby diesel-fueled Cl engine (> 50 hp) to operate up to 100 hours per year for maintenance and testing purposes on a site-specific basis, provided the DPM emission rate is less than or equal to 0.01 g/bhp-hr. Neither the ND nor the accompanying AQ Study identifies emissions from any stationary equipment, including fire pumps. This results in a significant underestimation of potential air quality impacts and public health risks.

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[9] CAPCOA. 2021. Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity. Pg 741

[10] Meridian Consultants. 2024. Air Quality Study KPAC Coil Avenue Freezer Expansion Project. 1420 Coile Avenue, Wilmington, CA. 90074. Dated September 2024. Pg. 3

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

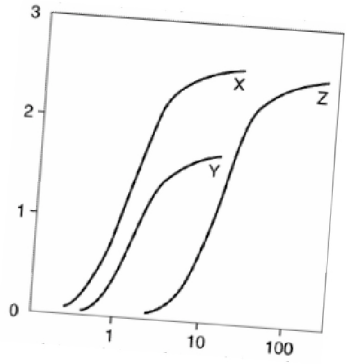
Conclusion

The facts identified and referenced in this comment letter lead me to reasonably conclude that the Project could result in significant impacts if allowed to proceed. A draft environmental impact report should be prepared to address these substantial concerns.

Sincerely,

Exhibit A

Curriculum Vitae



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James J. J. Clark, Ph.D.

Principal Toxicologist

Toxicology/Exposure Assessment Modeling

Risk Assessment/Analysis/Dispersion Modeling

Education:

Ph.D., Environmental Health Science, University of California, 1995

M.S., Environmental Health Science, University of California, 1993

B.S., Biophysical and Biochemical Sciences, University of Houston, 1987

Professional Experience:

Dr. Clark is a well recognized toxicologist, air modeler, and health scientist. He has 20 years of experience in researching the effects of environmental contaminants on human health including environmental fate and transport modeling (SCREEN3, AEROMOD, ISCST3, Johnson-Ettinger Vapor Intrusion Modeling); exposure assessment modeling (partitioning of contaminants in the environment as well as PBPK modeling); conducting and managing human health risk assessments for regulatory compliance and risk-based clean-up levels; and toxicological and medical literature research.

Significant projects performed by Dr. Clark include the following:

LITIGATION SUPPORT

Case: James Harold Caygle, et al, v. Drummond Company, Inc. Circuit Court for the Tenth Judicial Circuit, Jefferson County, Alabama. Civil Action. CV-2009

Client: Environmental Litgation Group, Birmingham, Alabama

Dr. Clark performed an air quality assessment of emissions from a coke factory located in Tarrant, Alabama. The assessment reviewed include a comprehensive review of air quality standards, measured concentrations of pollutants from factory, an inspection of the facility and detailed assessment of the impacts on the community. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Rose Roper V. Nissan North America, et al. Superior Court of the State Of California for the County Of Los Angeles – Central Civil West. Civil Action. NC041739

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to multiple chemicals, including benzene, who later developed a respiratory distress. A review of the individual's medical and occupational history was performed to prepare an exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to respiratory irritants. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: O'Neil V. Sherwin Williams, et al. United States District Court Central District of California

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to petroleum distillates who later developed a bladder cancer. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Summary judgment for defendants.

Case: Moore V., Shell Oil Company, et al. Superior Court of the State Of California for the County Of Los Angeles

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to chemicals while benzene who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Raymond Saltonstall V. Fuller O'Brien, KILZ, and Zinsser, et al. United States District Court Central District of California

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to benzene who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Richard Boyer and Elizabeth Boyer, husband and wife, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-7G.

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of a family exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: JoAnne R. Cook, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-9R

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of an individual exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Patrick Allen And Susan Allen, husband and wife, and Andrew Allen, a minor, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-W

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of a family exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Michael Fahey, Susan Fahey V. Atlantic Richfield Company, et al. United States District Court Central District of California Civil Action Number CV-06 7109 JCL.

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to refined petroleum hydrocarbons who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Constance Acevedo, et al., V. California Spray-Chemical Company, et al., Superior Court of the State Of California, County Of Santa Cruz. Case No. CV 146344

Dr. Clark performed a comprehensive exposure assessment of community members exposed to toxic metals from a former lead arsenate manufacturing facility. The former manufacturing site had undergone a DTSC mandated removal action/remediation for the presence of the toxic metals at the site. Opinions were presented regarding the elevated levels of arsenic and lead (in attic dust and soils) found throughout the community and the potential for harm to the plaintiffs in question.

Case Result: Settlement in favor of defendant.

Case: Michael Nawrocki V. The Coastal Corporation, Kurk Fuel Company, Pautler Oil Service, State of New York Supreme Court, County of Erie, Index Number I2001-11247

Client: Richard G. Berger Attorney At Law, Buffalo, New York

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to refined petroleum hydrocarbons who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the

known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Judgement in favor of defendant.

SELECTED AIR MODELING RESEARCH/PROJECTS

Client – Confidential

Dr. Clark performed a comprehensive evaluation of criteria pollutants, air toxins, and particulate matter emissions from a carbon black production facility to determine the impacts on the surrounding communities. The results of the dispersion model will be used to estimate acute and chronic exposure concentrations to multiple contaminants and will be incorporated into a comprehensive risk evaluation.

Client – Confidential

Dr. Clark performed a comprehensive evaluation of air toxins and particulate matter emissions from a railroad tie manufacturing facility to determine the impacts on the surrounding communities. The results of the dispersion model have been used to estimate acute and chronic exposure concentrations to multiple contaminants and have been incorporated into a comprehensive risk evaluation.

Client – Los Angeles Alliance for a New Economy (LAANE), Los Angeles, California

Dr. Clark is advising the LAANE on air quality issues related to current flight operations at the Los Angeles International Airport (LAX) operated by the Los Angeles World Airport (LAWA) Authority. He is working with the LAANE and LAX staff to develop a comprehensive strategy for meeting local community concerns over emissions from flight operations and to engage federal agencies on the issue of local impacts of community airports.

Client – City of Santa Monica, Santa Monica, California

Dr. Clark is advising the City of Santa Monica on air quality issues related to current flight operations at the facility. He is working with the City staff to develop a comprehensive strategy for meeting local community concerns over emissions from flight operations and to engage federal agencies on the issue of local impacts of community airports.

Client: Omnitrans, San Bernardino, California

Dr. Clark managed a public health survey of three communities near transit fueling facilities in San Bernardino and Montclair California in compliance with California Senate Bill 1927. The survey included an epidemiological survey of the effected communities, emission surveys of local businesses, dispersion modeling to determine potential emission concentrations within the communities, and a comprehensive risk assessment of each community. The results of the study were presented to the Governor as mandated by Senate Bill 1927.

Client: Confidential, San Francisco, California

Summarized cancer types associated with exposure to metals and smoking. Researched the specific types of cancers associated with exposure to metals and smoking. Provided causation analysis of the association between cancer types and exposure for use by non-public health professionals.

Client: Confidential, Minneapolis, Minnesota

Prepared human health risk assessment of workers exposed to VOCs from neighboring petroleum storage/transport facility. Reviewed the systems in place for distribution of petroleum hydrocarbons to identify chemicals of concern (COCs), prepared comprehensive toxicological summaries of COCs, and quantified potential risks from carcinogens and non-carcinogens to receptors at or adjacent to site. This evaluation was used in the support of litigation.

Client – United Kingdom Environmental Agency

Dr. Clark is part of team that performed comprehensive evaluation of soil vapor intrusion of VOCs from former landfill adjacent residences for the United Kingdom's Environment

Agency. The evaluation included collection of liquid and soil vapor samples at site, modeling of vapor migration using the Johnson Ettinger Vapor Intrusion model, and calculation of site-specific health based vapor thresholds for chlorinated solvents, aromatic hydrocarbons, and semi-volatile organic compounds. The evaluation also included a detailed evaluation of the use, chemical characteristics, fate and transport, and toxicology of chemicals of concern (COC). The results of the evaluation have been used as a briefing tool for public health professionals.

EMERGING/PERSISTENT CONTAMINANT RESEARCH/PROJECTS

Client: Ameren Services, St. Louis, Missouri

Managed the preparation of a comprehensive human health risk assessment of workers and residents at or near an NPL site in Missouri. The former operations at the Property included the servicing and repair of electrical transformers, which resulted in soils and groundwater beneath the Property and adjacent land becoming impacted with PCB and chlorinated solvent compounds. The results were submitted to U.S. EPA for evaluation and will be used in the final ROD.

Client: City of Santa Clarita, Santa Clarita, California

Dr. Clark is managing the oversight of the characterization, remediation and development activities of a former 1,000 acre munitions manufacturing facility for the City of Santa Clarita. The site is impacted with a number of contaminants including perchlorate, unexploded ordinance, and volatile organic compounds (VOCs). The site is currently under a number of regulatory consent orders, including an Immanent and Substantial Endangerment Order. Dr. Clark is assisting the impacted municipality with the development of remediation strategies, interaction with the responsible parties and stakeholders, as well as interfacing with the regulatory agency responsible for oversight of the site cleanup.

Client: Confidential, Los Angeles, California

Prepared comprehensive evaluation of perchlorate in environment. Dr. Clark evaluated the production, use, chemical characteristics, fate and transport, toxicology, and remediation of perchlorate. Perchlorates form the basis of solid rocket fuels and have recently been detected in water supplies in the United States. The results of this research

were presented to the USEPA, National GroundWater, and ultimately published in a recent book entitled *Perchlorate in the Environment*.

Client – Confidential, Los Angeles, California

Dr. Clark is performing a comprehensive review of the potential for pharmaceuticals and their by-products to impact groundwater and surface water supplies. This evaluation will include a review if available data on the history of pharmaceutical production in the United States; the chemical characteristics of various pharmaceuticals; environmental fate and transport; uptake by xenobiotics; the potential effects of pharmaceuticals on water treatment systems; and the potential threat to public health. The results of the evaluation may be used as a briefing tool for non-public health professionals.

PUBLIC HEALTH/TOXICOLOGY

Client: Brayton Purcell, Novato, California

Dr. Clark performed a toxicological assessment of residents exposed to methyl-tertiary butyl ether (MTBE) from leaking underground storage tanks (LUSTs) adjacent to the subject property. The symptomology of residents and guests of the subject property were evaluated against the known outcomes in published literature to exposure to MTBE. The study found that residents had been exposed to MTBE in their drinking water; that concentrations of MTBE detected at the site were above regulatory guidelines; and, that the symptoms and outcomes expressed by residents and guests were consistent with symptoms and outcomes documented in published literature.

Client: Confidential, San Francisco, California

Identified and analyzed fifty years of epidemiological literature on workplace exposures to heavy metals. This research resulted in a summary of the types of cancer and non-cancer diseases associated with occupational exposure to chromium as well as the mortality and morbidity rates.

Client: Confidential, San Francisco, California

Summarized major public health research in United States. Identified major public health research efforts within United States over last twenty years. Results were used as a briefing tool for non-public health professionals.

Client: Confidential, San Francisco, California

Quantified the potential multi-pathway dose received by humans from a pesticide applied indoors. Part of team that developed exposure model and evaluated exposure concentrations in a comprehensive report on the plausible range of doses received by a specific person. This evaluation was used in the support of litigation.

Client: Covanta Energy, Westwood, California

Evaluated health risk from metals in biosolids applied as soil amendment on agricultural lands. The biosolids were created at a forest waste cogeneration facility using 96% whole tree wood chips and 4 percent green waste. Mass loading calculations were used to estimate Cr(VI) concentrations in agricultural soils based on a maximum loading rate of 40 tons of biomass per acre of agricultural soil. The results of the study were used by the Regulatory agency to determine that the application of biosolids did not constitute a health risk to workers applying the biosolids or to residences near the agricultural lands.

Client – United Kingdom Environmental Agency

Oversaw a comprehensive toxicological evaluation of methyl-*tertiary* butyl ether (M*t*BE) for the United Kingdom's Environment Agency. The evaluation included available data on the production, use, chemical characteristics, fate and transport, toxicology, and remediation of M*t*BE. The results of the evaluation have been used as a briefing tool for public health professionals.

Client – Confidential, Los Angeles, California

Prepared comprehensive evaluation of *tertiary* butyl alcohol (TBA) in municipal drinking water system. TBA is the primary breakdown product of M*t*BE, and is suspected to be the primary cause of M*t*BE toxicity. This evaluation will include available information on the production, use, chemical characteristics, fate and transport in the environment, absorption, distribution, routes of detoxification, metabolites, carcinogenic potential, and remediation of TBA. The results of the evaluation were used as a briefing tool for non-public health professionals.

Client – Confidential, Los Angeles, California

Prepared comprehensive evaluation of methyl *tertiary* butyl ether (MTBE) in municipal drinking water system. MTBE is a chemical added to gasoline to increase the octane

rating and to meet Federally mandated emission criteria. The evaluation included available data on the production, use, chemical characteristics, fate and transport, toxicology, and remediation of MTBE. The results of the evaluation have been were used as a briefing tool for non-public health professionals.

Client – Ministry of Environment, Lands & Parks, British Columbia

Dr. Clark assisted in the development of water quality guidelines for methyl tertiary-butyl ether (MTBE) to protect water uses in British Columbia (BC). The water uses to be considered includes freshwater and marine life, wildlife, industrial, and agricultural (e.g., irrigation and livestock watering) water uses. Guidelines from other jurisdictions for the protection of drinking water, recreation and aesthetics were to be identified.

Client: Confidential, Los Angeles, California

Prepared physiologically based pharmacokinetic (PBPK) assessment of lead risk of receptors at middle school built over former industrial facility. This evaluation is being used to determine cleanup goals and will be basis for regulatory closure of site.

Client: Kaiser Venture Incorporated, Fontana, California

Prepared PBPK assessment of lead risk of receptors at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

RISK ASSESSMENTS/REMEDIAL INVESTIGATIONS

Client: Confidential, Atlanta, Georgia

Researched potential exposure and health risks to community members potentially exposed to creosote, polycyclic aromatic hydrocarbons, pentachlorophenol, and dioxin compounds used at a former wood treatment facility. Prepared a comprehensive toxicological summary of the chemicals of concern, including the chemical characteristics, absorption, distribution, and carcinogenic potential. Prepared risk characterization of the carcinogenic and non-carcinogenic chemicals based on the exposure assessment to quantify the potential risk to members of the surrounding community. This evaluation was used to help settle class-action tort.

Client: Confidential, Escondido, California

Prepared comprehensive Preliminary Endangerment Assessment (PEA) of dense non-aqueous liquid phase hydrocarbon (chlorinated solvents) contamination at a former printed circuit board manufacturing facility. This evaluation was used for litigation support and may be used as the basis for reaching closure of the site with the lead regulatory agency.

Client: Confidential, San Francisco, California

Summarized epidemiological evidence for connective tissue and autoimmune diseases for product liability litigation. Identified epidemiological research efforts on the health effects of medical prostheses. This research was used in a meta-analysis of the health effects and as a briefing tool for non-public health professionals.

Client: Confidential, Bogotá, Columbia

Prepared comprehensive evaluation of the potential health risks associated with the redevelopment of a 13.7 hectares plastic manufacturing facility in Bogotá, Colombia The risk assessment was used as the basis for the remedial goals and closure of the site.

Client: Confidential, Los Angeles, California

Prepared comprehensive human health risk assessment of students, staff, and residents potentially exposed to heavy metals (principally cadmium) and VOCs from soil and soil vapor at 12-acre former crude oilfield and municipal landfill. The site is currently used as a middle school housing approximately 3,000 children. The evaluation determined that the site was safe for the current and future uses and was used as the basis for regulatory closure of site.

Client: Confidential, Los Angeles, California

Managed remedial investigation (RI) of heavy metals and volatile organic chemicals (VOCs) for a 15-acre former manufacturing facility. The RI investigation of the site included over 800 different sampling locations and the collection of soil, soil gas, and groundwater samples. The site is currently used as a year round school housing approximately 3,000 children. The Remedial Investigation was performed in a manner

that did not interrupt school activities and met the time restrictions placed on the project by the overseeing regulatory agency. The RI Report identified the off-site source of metals that impacted groundwater beneath the site and the sources of VOCs in soil gas and groundwater. The RI included a numerical model of vapor intrusion into the buildings at the site from the vadose zone to determine exposure concentrations and an air dispersion model of VOCs from the proposed soil vapor treatment system. The Feasibility Study for the Site is currently being drafted and may be used as the basis for granting closure of the site by DTSC.

Client: Confidential, Los Angeles, California

Prepared comprehensive human health risk assessment of students, staff, and residents potentially exposed to heavy metals (principally lead), VOCs, SVOCs, and PCBs from soil, soil vapor, and groundwater at 15-acre former manufacturing facility. The site is currently used as a year round school housing approximately 3,000 children. The evaluation determined that the site was safe for the current and future uses and will be basis for regulatory closure of site.

Client: Confidential, Los Angeles, California

Prepared comprehensive evaluation of VOC vapor intrusion into classrooms of middle school that was former 15-acre industrial facility. Using the Johnson-Ettinger Vapor Intrusion model, the evaluation determined acceptable soil gas concentrations at the site that did not pose health threat to students, staff, and residents. This evaluation is being used to determine cleanup goals and will be basis for regulatory closure of site.

Client –Dominguez Energy, Carson, California

Prepared comprehensive evaluation of the potential health risks associated with the redevelopment of 6-acre portion of a 500-acre oil and natural gas production facility in Carson, California. The risk assessment was used as the basis for closure of the site.

Kaiser Ventures Incorporated, Fontana, California

Prepared health risk assessment of semi-volatile organic chemicals and metals for a fifty-year old wastewater treatment facility used at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

ANR Freight - Los Angeles, California

Prepared a comprehensive Preliminary Endangerment Assessment (PEA) of petroleum hydrocarbon and metal contamination of a former freight depot. This evaluation was as the basis for reaching closure of the site with lead regulatory agency.

Kaiser Ventures Incorporated, Fontana, California

Prepared comprehensive health risk assessment of semi-volatile organic chemicals and metals for 23-acre parcel of a 1,100-acre former steel mill. The health risk assessment was used to determine clean up goals and as the basis for granting closure of the site by lead regulatory agency. Air dispersion modeling using ISCST3 was performed to determine downwind exposure point concentrations at sensitive receptors within a 1 kilometer radius of the site. The results of the health risk assessment were presented at a public meeting sponsored by the Department of Toxic Substances Control (DTSC) in the community potentially affected by the site.

Unocal Corporation - Los Angeles, California

Prepared comprehensive assessment of petroleum hydrocarbons and metals for a former petroleum service station located next to sensitive population center (elementary school). The assessment used a probabilistic approach to estimate risks to the community and was used as the basis for granting closure of the site by lead regulatory agency.

Client: Confidential, Los Angeles, California

Managed oversight of remedial investigation most contaminated heavy metal site in California. Lead concentrations in soil excess of 68,000,000 parts per billion (ppb) have been measured at the site. This State Superfund Site was a former hard chrome plating operation that operated for approximately 40-years.

Client: Confidential, San Francisco, California

Coordinator of regional monitoring program to determine background concentrations of metals in air. Acted as liaison with SCAQMD and CARB to perform co-location sampling and comparison of accepted regulatory method with ASTM methodology.

Client: Confidential, San Francisco, California

Analyzed historical air monitoring data for South Coast Air Basin in Southern California and potential health risks related to ambient concentrations of carcinogenic metals and volatile organic compounds. Identified and reviewed the available literature and calculated risks from toxins in South Coast Air Basin.

IT Corporation, North Carolina

Prepared comprehensive evaluation of potential exposure of workers to air-borne VOCs at hazardous waste storage facility under SUPERFUND cleanup decree. Assessment used in developing health based clean-up levels.

Professional Associations

American Public Health Association (APHA)

Association for Environmental Health and Sciences (AEHS)

American Chemical Society (ACS)

California Redevelopment Association (CRA)

International Society of Environmental Forensics (ISEF)

Society of Environmental Toxicology and Chemistry (SETAC)

Publications and Presentations:

Books and Book Chapters

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Sullivan, P. and **J.J. J. Clark**. 2006. *Choosing Safer Foods, A Guide To Minimizing Synthetic Chemicals In Your Diet*. Elsevier, Inc. Burlington, MA.

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Clark, J.J.J. 2001. "TBA: Chemical Properties, Production & Use, Fate and Transport, Toxicology, Detection in Groundwater, and Regulatory Standards" in *Oxygenates in the Environment.* Art Diaz, Ed.. Oxford University Press: New York.

Clark, J.J.J. 2000. "Toxicology of Perchlorate" in *Perchlorate in the Environment.* Edward Urbansky, Ed. Kluwer/Plenum: New York.

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Baker, J.; **Clark, J.J.J.**; Stanford, J.T. 1994. Ex Situ Remediation of Diesel Contaminated Railroad Sand by Soil Washing. Principles and Practices for Diesel Contaminated Soils, Volume III. P.T. Kostecki, E.J. Calabrese, and C.P.L. Barkan, eds. Amherst Scientific Publishers, Amherst, MA. pp 89-96.

Journal and Proceeding Articles

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008) A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equialency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. Organohalogen Compounds, Volume 70 (2008) page 002254.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008) Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. Organohalogen Compounds, Volume 70 (2008) page 000527

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Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** 2006. "Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006, August 21 – 25, 2006. Radisson SAS Scandinavia Hotel in Oslo Norway.

Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2005. "The Value Of An Odor Quality Classification Scheme For Compost Facility Evaluations" The U.S. Composting Council's 13th Annual Conference January 23 - 26, 2005, Crowne Plaza Riverwalk, San Antonio, TX.

Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2004. "The Value Of An Odor Quality Classification Scheme For Urban Odor" WEFTEC 2004. 77th Annual Technical Exhibition & Conference October 2 - 6, 2004, Ernest N. Morial Convention Center, New Orleans, Louisiana.

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Ozone Exposures in Residents of Los Angeles County. American Review of Respiratory Disease. 141(4):A70.

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Exhibit B

AERMOD Model Output

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** BREEZE AERMOD
** Trinity Consultants
** VERSION  11.0

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CO MODELOPT  DFAULT  CONC  NODRYDPLT  NOWETDPLT
CO RUNORNOT  RUN
CO AVERTIME  PERIOD
CO URBANOPT  2276.89  AREA1  1
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SO URBANSRC  IA0AM1RA
SO EMISFACT  IA0AM1RA  HRDOW  0  0  0  0  0  0  0  1  1  1  1  0  1  1  1  1  0  0  0  0  0  0  0  0  0  0
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** RCPDESCR  Gamble and Drumm Residences
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** RCPDESCR  Gamble and Drumm Residences
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** RCPDESCR  Gamble and Drumm Residences
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** RCPDESCR  East Cruces And East Sandison Residences
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** RCPDESCR  East Cruces And East Sandison Residences
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** RCPDESCR  East Cruces And East Sandison Residences
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** RCPDESCR  East Cruces And East Sandison Residences
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** RCPDESCR  East Cruces And East Sandison Residences
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** RCPDESCR  East Cruces And East Sandison Residences
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** RCPDESCR  East Cruces And East Sandison Residences
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** RCPDESCR  East Cruces And East Sandison Residences
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** RCPDESCR  East Cruces And East Sandison Residences
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** RCPDESCR  East Cruces And East Sandison Residences
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** RCPDESCR  East Cruces And East Sandison Residences
RE DISCCART  384715.1  3740001.5  11.89  11.89
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** RCPDESCR  East Cruces And East Sandison Residences
RE DISCCART  384725.1  3740041.5  12.19  12.19
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** RCPDESCR  East Cruces And East Sandison Residences
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RE DISCCART  384755.1  3740041.5  12.19  12.19
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** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
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RE DISCCART  384863.9  3739885.3  10.36  10.36
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384873.9  3739885.3  10.36  10.36
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384883.9  3739885.3  10.36  10.36
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384713.9  3739895.3  11.1  11.1
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384723.9  3739895.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384733.9  3739895.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384743.9  3739895.3  10.95  10.95
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384753.9  3739895.3  10.8  10.8
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384763.9  3739895.3  10.67  10.67
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384773.9  3739895.3  10.67  10.67
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384783.9  3739895.3  10.67  10.67
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384793.9  3739895.3  10.67  10.67
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384803.9  3739895.3  10.65  10.65
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384813.9  3739895.3  10.62  10.62
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384823.9  3739895.3  10.62  10.62
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** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384843.9  3739895.3  10.36  10.36
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384853.9  3739895.3  10.36  10.36
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384863.9  3739895.3  10.36  10.36
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384873.9  3739895.3  10.36  10.36
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384883.9  3739895.3  10.36  10.36
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384713.9  3739905.3  11.26  11.26
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384723.9  3739905.3  11.1  11.1
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384733.9  3739905.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384743.9  3739905.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384753.9  3739905.3  10.95  10.95
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384763.9  3739905.3  10.93  10.93
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384773.9  3739905.3  10.8  10.8
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384783.9  3739905.3  10.67  10.67
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384793.9  3739905.3  10.67  10.67
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384803.9  3739905.3  10.67  10.67
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384813.9  3739905.3  10.67  10.67
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384823.9  3739905.3  10.67  10.67
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384833.9  3739905.3  10.65  10.65
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384843.9  3739905.3  10.62  10.62
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384853.9  3739905.3  10.62  10.62
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384863.9  3739905.3  10.49  10.49
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384873.9  3739905.3  10.36  10.36
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384883.9  3739905.3  10.36  10.36
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384893.9  3739905.3  10.36  10.36
** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384733.9  3739915.3  11.1  11.1
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RE DISCCART  384743.9  3739915.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384753.9  3739915.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384763.9  3739915.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384773.9  3739915.3  10.95  10.95
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384783.9  3739915.3  10.93  10.93
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384793.9  3739915.3  10.8  10.8
** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384823.9  3739915.3  10.67  10.67
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384833.9  3739915.3  10.67  10.67
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384843.9  3739915.3  10.67  10.67
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384853.9  3739915.3  10.67  10.67
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384863.9  3739915.3  10.65  10.65
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384873.9  3739915.3  10.62  10.62
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384883.9  3739915.3  10.62  10.62
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384893.9  3739915.3  10.62  10.62
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384903.9  3739915.3  10.62  10.62
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384713.9  3739925.3  11.28  11.28
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384723.9  3739925.3  11.28  11.28
** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384743.9  3739925.3  11.23  11.23
** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384773.9  3739925.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384783.9  3739925.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384793.9  3739925.3  10.95  10.95
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384803.9  3739925.3  10.93  10.93
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384813.9  3739925.3  10.93  10.93
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384823.9  3739925.3  10.8  10.8
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384833.9  3739925.3  10.67  10.67
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384843.9  3739925.3  10.67  10.67
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384853.9  3739925.3  10.67  10.67
** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384883.9  3739925.3  10.67  10.67
** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384733.9  3739935.3  11.28  11.28
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384743.9  3739935.3  11.28  11.28
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** RCPDESCR  Blinn and East O Street Residences
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RE DISCCART  384763.9  3739935.3  11.23  11.23
** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384783.9  3739935.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384793.9  3739935.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384803.9  3739935.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384813.9  3739935.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384823.9  3739935.3  10.95  10.95
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384833.9  3739935.3  10.93  10.93
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384843.9  3739935.3  10.93  10.93
** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384863.9  3739935.3  10.67  10.67
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384873.9  3739935.3  10.67  10.67
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384883.9  3739935.3  10.67  10.67
** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384753.9  3739945.3  11.28  11.28
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RE DISCCART  384763.9  3739945.3  11.28  11.28
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** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384783.9  3739945.3  11.23  11.23
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384793.9  3739945.3  11.23  11.23
** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384813.9  3739945.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384823.9  3739945.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384833.9  3739945.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384843.9  3739945.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384853.9  3739945.3  10.95  10.95
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384863.9  3739945.3  10.93  10.93
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384873.9  3739945.3  10.93  10.93
** RCPDESCR  Blinn and East O Street Residences
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RE DISCCART  384883.9  3739945.3  10.93  10.93
** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384903.9  3739945.3  10.93  10.93
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384913.9  3739945.3  10.8  10.8
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384783.9  3739955.3  11.28  11.28
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384793.9  3739955.3  11.28  11.28
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384803.9  3739955.3  11.26  11.26
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384813.9  3739955.3  11.23  11.23
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384823.9  3739955.3  11.23  11.23
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384833.9  3739955.3  11.23  11.23
** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384853.9  3739955.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384863.9  3739955.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384873.9  3739955.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384883.9  3739955.3  10.97  10.97
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** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384903.9  3739955.3  10.97  10.97
** RCPDESCR  Blinn and East O Street Residences
RE DISCCART  384913.9  3739955.3  10.95  10.95
** RCPDESCR  Blinn and East O Street Residences
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** RCPDESCR  East Colon and Blinn Ave Residences
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** RCPDESCR  East Colon and Blinn Ave Residences
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** RCPDESCR  East Colon and Blinn Ave Residences
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** RCPDESCR  East Colon and Blinn Ave Residences
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** RCPDESCR  East Colon and Blinn Ave Residences
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** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384827.2  3739782.4  9.45  9.45
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384717.2  3739792.4  10.23  10.23
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384727.2  3739792.4  10.23  10.23
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384737.2  3739792.4  10.09  10.09
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384747.2  3739792.4  9.95  9.95
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** RCPDESCR  East Colon and Blinn Ave Residences
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** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384767.2  3739792.4  9.93  9.93
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384777.2  3739792.4  9.78  9.78
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384787.2  3739792.4  9.75  9.75
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384797.2  3739792.4  9.75  9.75
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384807.2  3739792.4  9.64  9.64
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384817.2  3739792.4  9.62  9.62
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384827.2  3739792.4  9.62  9.62
** RCPDESCR  East Colon and Blinn Ave Residences
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** RCPDESCR  East Colon and Blinn Ave Residences
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** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384737.2  3739802.4  10.25  10.25
** RCPDESCR  East Colon and Blinn Ave Residences
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** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384757.2  3739802.4  10.09  10.09
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384767.2  3739802.4  10.06  10.06
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384777.2  3739802.4  9.95  9.95
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384787.2  3739802.4  9.93  9.93
** RCPDESCR  East Colon and Blinn Ave Residences
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** RCPDESCR  East Colon and Blinn Ave Residences
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** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384817.2  3739802.4  9.75  9.75
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384827.2  3739802.4  9.75  9.75
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384837.2  3739802.4  9.75  9.75
** RCPDESCR  East Colon and Blinn Ave Residences
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** RCPDESCR  East Colon and Blinn Ave Residences
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** RCPDESCR  East Colon and Blinn Ave Residences
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** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384747.2  3739812.4  10.36  10.36
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384757.2  3739812.4  10.25  10.25
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384767.2  3739812.4  10.23  10.23
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384777.2  3739812.4  10.09  10.09
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384787.2  3739812.4  10.06  10.06
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384797.2  3739812.4  9.95  9.95
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384807.2  3739812.4  9.93  9.93
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384817.2  3739812.4  9.93  9.93
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384827.2  3739812.4  9.93  9.93
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384837.2  3739812.4  9.78  9.78
** RCPDESCR  East Colon and Blinn Ave Residences
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** RCPDESCR  East Colon and Blinn Ave Residences
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** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384737.2  3739822.4  10.53  10.53
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384747.2  3739822.4  10.39  10.39
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384757.2  3739822.4  10.36  10.36
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384767.2  3739822.4  10.36  10.36
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384777.2  3739822.4  10.25  10.25
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384787.2  3739822.4  10.09  10.09
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384797.2  3739822.4  10.06  10.06
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384807.2  3739822.4  10.06  10.06
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384817.2  3739822.4  10.06  10.06
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384827.2  3739822.4  10.06  10.06
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384837.2  3739822.4  9.95  9.95
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384847.2  3739822.4  9.93  9.93
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384717.2  3739832.4  10.67  10.67
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384727.2  3739832.4  10.67  10.67
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384737.2  3739832.4  10.67  10.67
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384747.2  3739832.4  10.56  10.56
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384757.2  3739832.4  10.39  10.39
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384767.2  3739832.4  10.36  10.36
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384777.2  3739832.4  10.36  10.36
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384787.2  3739832.4  10.25  10.25
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384797.2  3739832.4  10.09  10.09
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384807.2  3739832.4  10.06  10.06
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384817.2  3739832.4  10.06  10.06
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384827.2  3739832.4  10.06  10.06
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384837.2  3739832.4  10.06  10.06
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384847.2  3739832.4  10.06  10.06
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384857.2  3739832.4  10.06  10.06
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384717.2  3739842.4  10.7  10.7
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384727.2  3739842.4  10.67  10.67
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384737.2  3739842.4  10.67  10.67
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384747.2  3739842.4  10.67  10.67
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384757.2  3739842.4  10.42  10.42
```

```
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384767.2  3739842.4  10.36  10.36
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384777.2  3739842.4  10.36  10.36
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384787.2  3739842.4  10.36  10.36
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384797.2  3739842.4  10.25  10.25
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384807.2  3739842.4  10.09  10.09
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384817.2  3739842.4  10.06  10.06
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384827.2  3739842.4  10.06  10.06
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384837.2  3739842.4  10.06  10.06
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384847.2  3739842.4  10.06  10.06
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384857.2  3739842.4  10.06  10.06
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384717.2  3739852.4  10.86  10.86
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384727.2  3739852.4  10.7  10.7
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384737.2  3739852.4  10.67  10.67
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384747.2  3739852.4  10.67  10.67
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384757.2  3739852.4  10.56  10.56
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384767.2  3739852.4  10.39  10.39
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384777.2  3739852.4  10.36  10.36
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384787.2  3739852.4  10.36  10.36
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384797.2  3739852.4  10.36  10.36
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384807.2  3739852.4  10.25  10.25
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384817.2  3739852.4  10.23  10.23
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384827.2  3739852.4  10.23  10.23
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384837.2  3739852.4  10.09  10.09
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384847.2  3739852.4  10.06  10.06
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384857.2  3739852.4  10.06  10.06
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384867.2  3739852.4  10.06  10.06
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384847.2  3739862.4  10.23  10.23
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384857.2  3739862.4  10.23  10.23
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384867.2  3739862.4  10.23  10.23
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384877.2  3739862.4  10.23  10.23
** RCPDESCR  East Colon and Blinn Ave Residences
RE DISCCART  384744.0  3739711.2  9.06  9.06
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384754.0  3739711.2  8.97  8.97
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384764.0  3739711.2  8.97  8.97
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384774.0  3739711.2  8.91  8.91
** RCPDESCR  East Colon and Drumm Ave Residences
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```
RE DISCCART  384784.0  3739711.2  8.84  8.84
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384744.0  3739721.2  9.14  9.14
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384754.0  3739721.2  9.14  9.14
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384764.0  3739721.2  9.14  9.14
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384774.0  3739721.2  9.06  9.06
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384784.0  3739721.2  8.97  8.97
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384724.0  3739731.2  9.21  9.21
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384734.0  3739731.2  9.14  9.14
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384744.0  3739731.2  9.14  9.14
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384754.0  3739731.2  9.14  9.14
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384764.0  3739731.2  9.14  9.14
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384774.0  3739731.2  9.14  9.14
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384784.0  3739731.2  9.14  9.14
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384794.0  3739731.2  9.14  9.14
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384724.0  3739741.2  9.36  9.36
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384734.0  3739741.2  9.28  9.28
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384744.0  3739741.2  9.28  9.28
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384754.0  3739741.2  9.21  9.21
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384764.0  3739741.2  9.14  9.14
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384774.0  3739741.2  9.14  9.14
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384784.0  3739741.2  9.14  9.14
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384794.0  3739741.2  9.14  9.14
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384724.0  3739751.2  9.52  9.52
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384734.0  3739751.2  9.45  9.45
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384744.0  3739751.2  9.45  9.45
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384754.0  3739751.2  9.36  9.36
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384764.0  3739751.2  9.28  9.28
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384774.0  3739751.2  9.21  9.21
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384784.0  3739751.2  9.14  9.14
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384794.0  3739751.2  9.14  9.14
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384804.0  3739751.2  9.14  9.14
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384734.0  3739761.2  9.58  9.58
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384744.0  3739761.2  9.52  9.52
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384754.0  3739761.2  9.45  9.45
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384764.0  3739761.2  9.45  9.45
```

```
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384774.0  3739761.2  9.36  9.36
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384784.0  3739761.2  9.28  9.28
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384794.0  3739761.2  9.28  9.28
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384804.0  3739761.2  9.28  9.28
** RCPDESCR  East Colon and Drumm Ave Residences
RE DISCCART  384814.0  3739761.2  9.28  9.28
** RCPDESCR  East Colon and Drumm Ave Residences
** BOUNDARY  IA0AM1AX
RE DISCCART  384800.2  3739699.1  8.84  8.84
RE DISCCART  384822.6  3739698.3  8.86  8.86
RE DISCCART  384836.9  3739697.5  8.86  8.86
RE DISCCART  384946.1  3739893.5  10.36  10.36
RE DISCCART  385150  3739908.7  10.36  10.36
RE DISCCART  385185.1  3739994.7  10.76  10.76
RE DISCCART  385204.2  3740061.6  11.05  11.05
RE DISCCART  385213.8  3740131.8  11.51  11.51
RE DISCCART  385201.8  3740178  12.19  12.19
RE DISCCART  385185.1  3740215.4  12.18  12.18
RE DISCCART  385146  3740273.6  11.89  11.89
RE DISCCART  385130.9  3740293.5  11.64  11.64
RE DISCCART  384935.7  3739946.9  10.67  10.67
RE DISCCART  384890.3  3739869.6  10.33  10.33
RE DISCCART  384835.3  3739778  9.45  9.45
RE DISCCART  384797.9  3739708.7  8.84  8.84
RE FINISHED

ME STARTING
ME SURFFILE  "C:\Users\jclar\OneDrive\Clark and Associates\Project 316 - ABJC - KPAC Coil Avenue
ISMND\KLGB_V11_trimmed.sfc"
** SURFFILE  "C:\Users\jclar\OneDrive\Clark and Associates\Project 316 - ABJC - KPAC Coil Avenue
ISMND\KLGB_V11_trimmed.sfc"
ME PROFFILE  "C:\Users\jclar\OneDrive\Clark and Associates\Project 316 - ABJC - KPAC Coil Avenue
ISMND\KLGB_V11_trimmed.pfl"
** PROFFILE  "C:\Users\jclar\OneDrive\Clark and Associates\Project 316 - ABJC - KPAC Coil Avenue
ISMND\KLGB_V11_trimmed.pfl"
ME SURFDATA  23129 2015
ME UAIRDATA  3190 2015
ME PROFBASE  9.65  METERS
ME FINISHED

OU STARTING
OU FILEFORM  FIX
OU PLOTFILE  PERIOD  ALL  ALL`PERIOD.plt  10000
OU POSTFILE  PERIOD  ALL  UNFORM  ALL`PERIOD.bin  10001
OU FINISHED


  *** Message Summary For AERMOD Model Setup ***

  --------- Summary of Total Messages --------

 A Total of            0 Fatal Error Message(s)
 A Total of            5 Warning Message(s)
 A Total of            0 Informational Message(s)


    ******** FATAL ERROR MESSAGES ********
               ***  NONE  ***


    ********   WARNING MESSAGES   ********
 CO W320      11       URBOPT: Input Parameter May Be Out-of-Range for Parameter       URB-POP
 ME W186    1143       MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used          0.50
 ME W187    1143       MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET
 OU W565    1147       PERPLT: Possible Conflict With Dynamically Allocated FUNIT     PLOTFILE
```

```
 OU W565    1148       PERPST: Possible Conflict With Dynamically Allocated FUNIT     POSTFILE

 ***********************************
 *** SETUP Finishes Successfully ***
 ***********************************

 *** AERMOD - VERSION 22112  ***   ***  KPAC COIL AVENUE FREEZER EXPANSION PROJECT                          ***
     05/19/25
 *** AERMET - VERSION  22112 ***   ***  1420 Coil Avenue, Wilmington, CA 90074                             ***
   11:56:38

   PAGE   1
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  URBAN  ADJ_U*

                                          ***     MODEL SETUP OPTIONS SUMMARY       ***
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - -

 ** Model Options Selected:
      * Model Uses Regulatory DEFAULT Options
      * Model Is Setup For Calculation of Average CONCentration Values.
      * NO GAS DEPOSITION Data Provided.
      * NO PARTICLE DEPOSITION Data Provided.
      * Model Uses NO DRY DEPLETION. DDPLETE  =  F
      * Model Uses NO WET DEPLETION. WETDPLT  =  F
      * Stack-tip Downwash.
      * Model Accounts for ELEVated Terrain Effects.
      * Use Calms Processing Routine.
      * Use Missing Data Processing Routine.
      * No Exponential Decay.
      * Model Uses URBAN Dispersion Algorithm for the SBL for     1 Source(s),
        for Total of    1 Urban Area(s):
   Urban Population =      2276.9 ;  Urban Roughness Length =  1.000 m
      * Urban Roughness Length of 1.0 Meter Used.
      * ADJ_U*   - Use ADJ_U* option for SBL in AERMET
      * CCVR_Sub - Meteorological data includes CCVR substitutions
      * TEMP_Sub - Meteorological data includes TEMP substitutions
      * Model Assumes No FLAGPOLE Receptor Heights.
      * The User Specified a Pollutant Type of: DPM

 **Model Calculates PERIOD Averages Only

 **This Run Includes:      1 Source(s);       1 Source Group(s); and     559 Receptor(s)

                with:      0 POINT(s), including
                           0 POINTCAP(s) and      0 POINTHOR(s)
                 and:      0 VOLUME source(s)
                 and:      1 AREA type source(s)
                 and:      0 LINE source(s)
                 and:      0 RLINE/RLINEXT source(s)
                 and:      0 OPENPIT source(s)
                 and:      0 BUOYANT LINE source(s) with a total of     0 line(s)
                 and:      0 SWPOINT source(s)


 **Model Set To Continue RUNning After the Setup Testing.

 **The AERMET Input Meteorological Data Version Date:  22112

 **Output Options Selected:
          Model Outputs Tables of PERIOD Averages by Receptor
          Model Outputs External File(s) of Concurrent Values for Postprocessing (POSTFILE Keyword)
          Model Outputs External File(s) of High Values for Plotting (PLOTFILE Keyword)

 **NOTE:  The Following Flags May Appear Following CONC Values:  c for Calm Hours
                                                                 m for Missing Hours
                                                                 b for Both Calm and Missing Hours

 **Misc. Inputs:  Base Elev. for Pot. Temp. Profile (m MSL) =     9.65 ;  Decay Coef. =    0.000     ;  Rot. Angle
```

=   0.0
                Emission Units = GRAMS/SEC   ; Emission Rate Unit Factor =
0.10000E+07
                Output Units   = MICROGRAMS/M**3

 **Approximate Storage Requirements of Model =   3.6 MB of RAM.

 **Input Runstream File: aermod.inp

 **Output Print File: aermod.out

                                        *** AREAPOLY SOURCE DATA ***

              NUMBER EMISSION RATE   LOCATION OF AREA BASE   RELEASE NUMBER   INIT.   URBAN EMISSION RATE
   SOURCE   PART. (GRAMS/SEC   X   Y   ELEV.   HEIGHT OF VERTS.   SZ   SOURCE SCALAR VARY
     ID   CATS.   /METER**2)   (METERS) (METERS) (METERS) (METERS)   (METERS)   BY
 -
- - - - - -

 IA0AM1RA   0   0.33379E-06 385067.2 3740104.3   0.0   5.00   5   2.50   YES   HRDOW

                                     *** SOURCE IDs DEFINING SOURCE GROUPS ***

 SRCGROUP ID   SOURCE IDs
 -----------   ----------

  ALL   IA0AM1RA   ,

                                    *** SOURCE IDs DEFINED AS URBAN SOURCES ***

  URBAN ID   URBAN POP   SOURCE IDs
  --------   ---------   ----------

               2277.   IA0AM1RA   ,

SOURCE ID = IA0AM1RA ; SOURCE TYPE = AREAPOLY :

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
DAY OF WEEK = WEEKDAY													
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00
8	.1000E+01												
9	.1000E+01	10	.1000E+01	11	.1000E+01	12	.0000E+00	13	.1000E+01	14	.1000E+01	15	.1000E+01
16	.1000E+01												
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00
24	.0000E+00												
DAY OF WEEK = SATURDAY													
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00
8	.0000E+00												
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00
16	.0000E+00												
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00
24	.0000E+00												
DAY OF WEEK = SUNDAY													
1	.0000E+00	2	.0000E+00	3	.0000E+00	4	.0000E+00	5	.0000E+00	6	.0000E+00	7	.0000E+00
8	.0000E+00												
9	.0000E+00	10	.0000E+00	11	.0000E+00	12	.0000E+00	13	.0000E+00	14	.0000E+00	15	.0000E+00
16	.0000E+00												
17	.0000E+00	18	.0000E+00	19	.0000E+00	20	.0000E+00	21	.0000E+00	22	.0000E+00	23	.0000E+00
24	.0000E+00												

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

(384875.4, 3739981.5, 11.3, 11.3, 0.0); (384885.4, 3739981.5, 11.3, 11.3, 0.0);
(384895.4, 3739981.5, 11.3, 11.3, 0.0); (384905.4, 3739981.5, 11.2, 11.2, 0.0);
(384915.4, 3739981.5, 11.0, 11.0, 0.0); (384925.4, 3739981.5, 11.0, 11.0, 0.0);
(384935.4, 3739981.5, 10.9, 10.9, 0.0); (384875.4, 3739991.5, 11.4, 11.4, 0.0);
(384885.4, 3739991.5, 11.3, 11.3, 0.0); (384895.4, 3739991.5, 11.3, 11.3, 0.0);
(384905.4, 3739991.5, 11.3, 11.3, 0.0); (384915.4, 3739991.5, 11.2, 11.2, 0.0);
(384925.4, 3739991.5, 11.0, 11.0, 0.0); (384935.4, 3739991.5, 11.0, 11.0, 0.0);
(384945.4, 3739991.5, 10.8, 10.8, 0.0); (384875.4, 3740001.5, 11.6, 11.6, 0.0);
(384885.4, 3740001.5, 11.5, 11.5, 0.0); (384895.4, 3740001.5, 11.4, 11.4, 0.0);
(384905.4, 3740001.5, 11.3, 11.3, 0.0); (384915.4, 3740001.5, 11.3, 11.3, 0.0);
(384925.4, 3740001.5, 11.2, 11.2, 0.0); (384935.4, 3740001.5, 11.0, 11.0, 0.0);
(384945.4, 3740001.5, 10.9, 10.9, 0.0); (384875.4, 3740011.5, 11.7, 11.7, 0.0);
(384885.4, 3740011.5, 11.6, 11.6, 0.0); (384895.4, 3740011.5, 11.6, 11.6, 0.0);
(384905.4, 3740011.5, 11.5, 11.5, 0.0); (384915.4, 3740011.5, 11.3, 11.3, 0.0);

```
    ( 384925.4, 3740011.5,      11.3,      11.3,       0.0);        ( 384935.4, 3740011.5,      11.2,      11.2,
    0.0);
    ( 384945.4, 3740011.5,      11.0,      11.0,       0.0);        ( 384955.4, 3740011.5,      10.9,      10.9,
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    0.0);
    ( 384895.4, 3740021.5,      11.7,      11.7,       0.0);        ( 384905.4, 3740021.5,      11.6,      11.6,
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    0.0);
    ( 384935.4, 3740021.5,      11.3,      11.3,       0.0);        ( 384945.4, 3740021.5,      11.2,      11.2,
    0.0);
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    0.0);
    ( 384885.4, 3740031.5,      11.9,      11.9,       0.0);        ( 384895.4, 3740031.5,      11.9,      11.9,
    0.0);
    ( 384905.4, 3740031.5,      11.8,      11.8,       0.0);        ( 384915.4, 3740031.5,      11.7,      11.7,
    0.0);
    ( 384925.4, 3740031.5,      11.6,      11.6,       0.0);        ( 384935.4, 3740031.5,      11.5,      11.5,
    0.0);
    ( 384945.4, 3740031.5,      11.3,      11.3,       0.0);        ( 384955.4, 3740031.5,      11.2,      11.2,
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    0.0);
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    0.0);
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    0.0);
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    0.0);
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    0.0);
    ( 384765.1, 3739971.5,      11.6,      11.6,       0.0);        ( 384775.1, 3739971.5,      11.6,      11.6,
    0.0);
    ( 384785.1, 3739971.5,      11.6,      11.6,       0.0);        ( 384795.1, 3739971.5,      11.5,      11.5,
    0.0);
    ( 384805.1, 3739971.5,      11.4,      11.4,       0.0);        ( 384815.1, 3739971.5,      11.4,      11.4,
    0.0);
    ( 384825.1, 3739971.5,      11.4,      11.4,       0.0);        ( 384835.1, 3739971.5,      11.3,      11.3,
    0.0);
    ( 384845.1, 3739971.5,      11.3,      11.3,       0.0);        ( 384855.1, 3739971.5,      11.3,      11.3,
    0.0);
    ( 384705.1, 3739981.5,      11.9,      11.9,       0.0);        ( 384715.1, 3739981.5,      11.9,      11.9,
    0.0);
 *** AERMOD - VERSION 22112  ***   ***  KPAC COIL AVENUE FREEZER EXPANSION PROJECT                          ***
    05/19/25
 *** AERMET - VERSION  22112 ***   ***  1420 Coil Avenue, Wilmington, CA 90074                             ***
   11:56:38

   PAGE   7
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  URBAN  ADJ_U*
```

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

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(384755.1, 3739991.5, 11.9, 11.9, 0.0); (384765.1, 3739991.5, 11.9, 11.9, 0.0);
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*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

(384775.1, 3740031.5, 12.2, 12.2, 0.0); (384785.1, 3740031.5, 12.2, 12.2, 0.0);
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0.0);

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)

(METERS)

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(384803.9, 3739925.3, 10.9, 10.9, 0.0); (384813.9, 3739925.3, 10.9, 10.9, 0.0);
(384823.9, 3739925.3, 10.8, 10.8, 0.0); (384833.9, 3739925.3, 10.7, 10.7, 0.0);
(384843.9, 3739925.3, 10.7, 10.7, 0.0); (384853.9, 3739925.3, 10.7, 10.7, 0.0);
(384863.9, 3739925.3, 10.7, 10.7, 0.0); (384873.9, 3739925.3, 10.7, 10.7, 0.0);
(384883.9, 3739925.3, 10.7, 10.7, 0.0); (384893.9, 3739925.3, 10.7, 10.7, 0.0);
(384903.9, 3739925.3, 10.7, 10.7, 0.0); (384713.9, 3739935.3, 11.4, 11.4, 0.0);
(384723.9, 3739935.3, 11.3, 11.3, 0.0); (384733.9, 3739935.3, 11.3, 11.3, 0.0);
(384743.9, 3739935.3, 11.3, 11.3, 0.0); (384753.9, 3739935.3, 11.3, 11.3, 0.0);
(384763.9, 3739935.3, 11.2, 11.2, 0.0); (384773.9, 3739935.3, 11.1, 11.1, 0.0);
(384783.9, 3739935.3, 11.0, 11.0, 0.0); (384793.9, 3739935.3, 11.0, 11.0, 0.0);
(384803.9, 3739935.3, 11.0, 11.0, 0.0); (384813.9, 3739935.3, 11.0, 11.0,

0.0);
(384823.9, 3739935.3, 11.0, 11.0, 0.0); (384833.9, 3739935.3, 10.9, 10.9, 0.0);
(384843.9, 3739935.3, 10.9, 10.9, 0.0); (384853.9, 3739935.3, 10.8, 10.8, 0.0);
(384863.9, 3739935.3, 10.7, 10.7, 0.0); (384873.9, 3739935.3, 10.7, 10.7, 0.0);
(384883.9, 3739935.3, 10.7, 10.7, 0.0); (384893.9, 3739935.3, 10.7, 10.7, 0.0);
(384903.9, 3739935.3, 10.7, 10.7, 0.0); (384913.9, 3739935.3, 10.7, 10.7, 0.0);
(384713.9, 3739945.3, 11.6, 11.6, 0.0); (384723.9, 3739945.3, 11.5, 11.5, 0.0);
(384733.9, 3739945.3, 11.4, 11.4, 0.0); (384743.9, 3739945.3, 11.3, 11.3, 0.0);
(384753.9, 3739945.3, 11.3, 11.3, 0.0); (384763.9, 3739945.3, 11.3, 11.3, 0.0);
(384773.9, 3739945.3, 11.3, 11.3, 0.0); (384783.9, 3739945.3, 11.2, 11.2, 0.0);
(384793.9, 3739945.3, 11.2, 11.2, 0.0); (384803.9, 3739945.3, 11.1, 11.1, 0.0);
(384813.9, 3739945.3, 11.0, 11.0, 0.0); (384823.9, 3739945.3, 11.0, 11.0, 0.0);

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

(384833.9, 3739945.3, 11.0, 11.0, 0.0); (384843.9, 3739945.3, 11.0, 11.0, 0.0);
(384853.9, 3739945.3, 11.0, 11.0, 0.0); (384863.9, 3739945.3, 10.9, 10.9, 0.0);
(384873.9, 3739945.3, 10.9, 10.9, 0.0); (384883.9, 3739945.3, 10.9, 10.9, 0.0);
(384893.9, 3739945.3, 10.9, 10.9, 0.0); (384903.9, 3739945.3, 10.9, 10.9, 0.0);
(384913.9, 3739945.3, 10.8, 10.8, 0.0); (384783.9, 3739955.3, 11.3, 11.3, 0.0);
(384793.9, 3739955.3, 11.3, 11.3, 0.0); (384803.9, 3739955.3, 11.3, 11.3, 0.0);
(384813.9, 3739955.3, 11.2, 11.2, 0.0); (384823.9, 3739955.3, 11.2, 11.2, 0.0);
(384833.9, 3739955.3, 11.2, 11.2, 0.0); (384843.9, 3739955.3, 11.1, 11.1, 0.0);
(384853.9, 3739955.3, 11.0, 11.0, 0.0); (384863.9, 3739955.3, 11.0, 11.0, 0.0);
(384873.9, 3739955.3, 11.0, 11.0, 0.0); (384883.9, 3739955.3, 11.0, 11.0, 0.0);
(384893.9, 3739955.3, 11.0, 11.0, 0.0); (384903.9, 3739955.3, 11.0, 11.0, 0.0);
(384913.9, 3739955.3, 11.0, 11.0, 0.0); (384923.9, 3739955.3, 10.8, 10.8, 0.0);
(384717.2, 3739782.4, 10.1, 10.1, 0.0); (384727.2, 3739782.4, 10.0, 10.0, 0.0);
(384737.2, 3739782.4, 9.9, 9.9, 0.0); (384747.2, 3739782.4, 9.8, 9.8, 0.0);
(384757.2, 3739782.4, 9.8, 9.8, 0.0); (384767.2, 3739782.4, 9.8, 9.8, 0.0);
(384777.2, 3739782.4, 9.6, 9.6, 0.0); (384787.2, 3739782.4, 9.6, 9.6, 0.0);
(384797.2, 3739782.4, 9.6, 9.6, 0.0); (384807.2, 3739782.4, 9.5, 9.5, 0.0);

(384817.2, 3739782.4, 9.5, 9.5, 0.0); (384827.2, 3739782.4, 9.5, 9.5, 0.0);
(384717.2, 3739792.4, 10.2, 10.2, 0.0); (384727.2, 3739792.4, 10.2, 10.2, 0.0);
(384737.2, 3739792.4, 10.1, 10.1, 0.0); (384747.2, 3739792.4, 10.0, 10.0, 0.0);
(384757.2, 3739792.4, 9.9, 9.9, 0.0); (384767.2, 3739792.4, 9.9, 9.9, 0.0);
(384777.2, 3739792.4, 9.8, 9.8, 0.0); (384787.2, 3739792.4, 9.8, 9.8, 0.0);
(384797.2, 3739792.4, 9.8, 9.8, 0.0); (384807.2, 3739792.4, 9.6, 9.6, 0.0);
(384817.2, 3739792.4, 9.6, 9.6, 0.0); (384827.2, 3739792.4, 9.6, 9.6, 0.0);
(384717.2, 3739802.4, 10.4, 10.4, 0.0); (384727.2, 3739802.4, 10.4, 10.4, 0.0);
(384737.2, 3739802.4, 10.2, 10.2, 0.0); (384747.2, 3739802.4, 10.2, 10.2, 0.0);
(384757.2, 3739802.4, 10.1, 10.1, 0.0); (384767.2, 3739802.4, 10.1, 10.1, 0.0);
(384777.2, 3739802.4, 10.0, 10.0, 0.0); (384787.2, 3739802.4, 9.9, 9.9, 0.0);
(384797.2, 3739802.4, 9.8, 9.8, 0.0); (384807.2, 3739802.4, 9.8, 9.8, 0.0);
(384817.2, 3739802.4, 9.8, 9.8, 0.0); (384827.2, 3739802.4, 9.8, 9.8, 0.0);
(384837.2, 3739802.4, 9.8, 9.8, 0.0); (384717.2, 3739812.4, 10.5, 10.5, 0.0);
(384727.2, 3739812.4, 10.4, 10.4, 0.0); (384737.2, 3739812.4, 10.4, 10.4, 0.0);
(384747.2, 3739812.4, 10.4, 10.4, 0.0); (384757.2, 3739812.4, 10.2, 10.2, 0.0);
(384767.2, 3739812.4, 10.2, 10.2, 0.0); (384777.2, 3739812.4, 10.1, 10.1, 0.0);
(384787.2, 3739812.4, 10.1, 10.1, 0.0); (384797.2, 3739812.4, 10.0, 10.0, 0.0);
(384807.2, 3739812.4, 9.9, 9.9, 0.0); (384817.2, 3739812.4, 9.9, 9.9, 0.0);
(384827.2, 3739812.4, 9.9, 9.9, 0.0); (384837.2, 3739812.4, 9.8, 9.8, 0.0);
(384847.2, 3739812.4, 9.8, 9.8, 0.0); (384717.2, 3739822.4, 10.7, 10.7, 0.0);
(384727.2, 3739822.4, 10.6, 10.6, 0.0); (384737.2, 3739822.4, 10.5, 10.5, 0.0);
(384747.2, 3739822.4, 10.4, 10.4, 0.0); (384757.2, 3739822.4, 10.4, 10.4, 0.0);
(384767.2, 3739822.4, 10.4, 10.4, 0.0); (384777.2, 3739822.4, 10.2, 10.2, 0.0);
(384787.2, 3739822.4, 10.1, 10.1, 0.0); (384797.2, 3739822.4, 10.1, 10.1, 0.0);
(384807.2, 3739822.4, 10.1, 10.1, 0.0); (384817.2, 3739822.4, 10.1, 10.1, 0.0);
(384827.2, 3739822.4, 10.1, 10.1, 0.0); (384837.2, 3739822.4, 10.0, 10.0, 0.0);
(384847.2, 3739822.4, 9.9, 9.9, 0.0); (384717.2, 3739832.4, 10.7, 10.7, 0.0);

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

(384727.2, 3739832.4, 10.7, 10.7, 0.0); (384737.2, 3739832.4, 10.7, 10.7,

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0.0);
( 384747.2, 3739832.4,      10.6,      10.6,       0.0);        ( 384757.2, 3739832.4,      10.4,      10.4,
0.0);
( 384767.2, 3739832.4,      10.4,      10.4,       0.0);        ( 384777.2, 3739832.4,      10.4,      10.4,
0.0);
( 384787.2, 3739832.4,      10.2,      10.2,       0.0);        ( 384797.2, 3739832.4,      10.1,      10.1,
0.0);
( 384807.2, 3739832.4,      10.1,      10.1,       0.0);        ( 384817.2, 3739832.4,      10.1,      10.1,
0.0);
( 384827.2, 3739832.4,      10.1,      10.1,       0.0);        ( 384837.2, 3739832.4,      10.1,      10.1,
0.0);
( 384847.2, 3739832.4,      10.1,      10.1,       0.0);        ( 384857.2, 3739832.4,      10.1,      10.1,
0.0);
( 384717.2, 3739842.4,      10.7,      10.7,       0.0);        ( 384727.2, 3739842.4,      10.7,      10.7,
0.0);
( 384737.2, 3739842.4,      10.7,      10.7,       0.0);        ( 384747.2, 3739842.4,      10.7,      10.7,
0.0);
( 384757.2, 3739842.4,      10.4,      10.4,       0.0);        ( 384767.2, 3739842.4,      10.4,      10.4,
0.0);
( 384777.2, 3739842.4,      10.4,      10.4,       0.0);        ( 384787.2, 3739842.4,      10.4,      10.4,
0.0);
( 384797.2, 3739842.4,      10.2,      10.2,       0.0);        ( 384807.2, 3739842.4,      10.1,      10.1,
0.0);
( 384817.2, 3739842.4,      10.1,      10.1,       0.0);        ( 384827.2, 3739842.4,      10.1,      10.1,
0.0);
( 384837.2, 3739842.4,      10.1,      10.1,       0.0);        ( 384847.2, 3739842.4,      10.1,      10.1,
0.0);
( 384857.2, 3739842.4,      10.1,      10.1,       0.0);        ( 384717.2, 3739852.4,      10.9,      10.9,
0.0);
( 384727.2, 3739852.4,      10.7,      10.7,       0.0);        ( 384737.2, 3739852.4,      10.7,      10.7,
0.0);
( 384747.2, 3739852.4,      10.7,      10.7,       0.0);        ( 384757.2, 3739852.4,      10.6,      10.6,
0.0);
( 384767.2, 3739852.4,      10.4,      10.4,       0.0);        ( 384777.2, 3739852.4,      10.4,      10.4,
0.0);
( 384787.2, 3739852.4,      10.4,      10.4,       0.0);        ( 384797.2, 3739852.4,      10.4,      10.4,
0.0);
( 384807.2, 3739852.4,      10.2,      10.2,       0.0);        ( 384817.2, 3739852.4,      10.2,      10.2,
0.0);
( 384827.2, 3739852.4,      10.2,      10.2,       0.0);        ( 384837.2, 3739852.4,      10.1,      10.1,
0.0);
( 384847.2, 3739852.4,      10.1,      10.1,       0.0);        ( 384857.2, 3739852.4,      10.1,      10.1,
0.0);
( 384867.2, 3739852.4,      10.1,      10.1,       0.0);        ( 384847.2, 3739862.4,      10.2,      10.2,
0.0);
( 384857.2, 3739862.4,      10.2,      10.2,       0.0);        ( 384867.2, 3739862.4,      10.2,      10.2,
0.0);
( 384877.2, 3739862.4,      10.2,      10.2,       0.0);        ( 384744.0, 3739711.2,       9.1,       9.1,
0.0);
( 384754.0, 3739711.2,       9.0,       9.0,       0.0);        ( 384764.0, 3739711.2,       9.0,       9.0,
0.0);
( 384774.0, 3739711.2,       8.9,       8.9,       0.0);        ( 384784.0, 3739711.2,       8.8,       8.8,
0.0);
( 384744.0, 3739721.2,       9.1,       9.1,       0.0);        ( 384754.0, 3739721.2,       9.1,       9.1,
0.0);
( 384764.0, 3739721.2,       9.1,       9.1,       0.0);        ( 384774.0, 3739721.2,       9.1,       9.1,
0.0);
( 384784.0, 3739721.2,       9.0,       9.0,       0.0);        ( 384724.0, 3739731.2,       9.2,       9.2,
0.0);
( 384734.0, 3739731.2,       9.1,       9.1,       0.0);        ( 384744.0, 3739731.2,       9.1,       9.1,
0.0);
( 384754.0, 3739731.2,       9.1,       9.1,       0.0);        ( 384764.0, 3739731.2,       9.1,       9.1,
0.0);
( 384774.0, 3739731.2,       9.1,       9.1,       0.0);        ( 384784.0, 3739731.2,       9.1,       9.1,
0.0);
( 384794.0, 3739731.2,       9.1,       9.1,       0.0);        ( 384724.0, 3739741.2,       9.4,       9.4,
0.0);
( 384734.0, 3739741.2,       9.3,       9.3,       0.0);        ( 384744.0, 3739741.2,       9.3,       9.3,
0.0);
```

```
( 384754.0, 3739741.2,       9.2,       9.2,       0.0);        ( 384764.0, 3739741.2,       9.1,       9.1,
0.0);
( 384774.0, 3739741.2,       9.1,       9.1,       0.0);        ( 384784.0, 3739741.2,       9.1,       9.1,
0.0);
( 384794.0, 3739741.2,       9.1,       9.1,       0.0);        ( 384724.0, 3739751.2,       9.5,       9.5,
0.0);
( 384734.0, 3739751.2,       9.5,       9.5,       0.0);        ( 384744.0, 3739751.2,       9.5,       9.5,
0.0);
( 384754.0, 3739751.2,       9.4,       9.4,       0.0);        ( 384764.0, 3739751.2,       9.3,       9.3,
0.0);
( 384774.0, 3739751.2,       9.2,       9.2,       0.0);        ( 384784.0, 3739751.2,       9.1,       9.1,
0.0);
( 384794.0, 3739751.2,       9.1,       9.1,       0.0);        ( 384804.0, 3739751.2,       9.1,       9.1,
0.0);
( 384734.0, 3739761.2,       9.6,       9.6,       0.0);        ( 384744.0, 3739761.2,       9.5,       9.5,
0.0);
( 384754.0, 3739761.2,       9.5,       9.5,       0.0);        ( 384764.0, 3739761.2,       9.5,       9.5,
0.0);
( 384774.0, 3739761.2,       9.4,       9.4,       0.0);        ( 384784.0, 3739761.2,       9.3,       9.3,
0.0);
```


*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

```
( 384794.0, 3739761.2,       9.3,       9.3,       0.0);        ( 384804.0, 3739761.2,       9.3,       9.3,
0.0);
( 384814.0, 3739761.2,       9.3,       9.3,       0.0);        ( 384800.2, 3739699.1,       8.8,       8.8,
0.0);
( 384822.6, 3739698.3,       8.9,       8.9,       0.0);        ( 384836.9, 3739697.5,       8.9,       8.9,
0.0);
( 384946.1, 3739893.5,      10.4,      10.4,       0.0);        ( 385150.0, 3739908.7,      10.4,      10.4,
0.0);
( 385185.1, 3739994.7,      10.8,      10.8,       0.0);        ( 385204.2, 3740061.6,      11.1,      11.1,
0.0);
( 385213.8, 3740131.8,      11.5,      11.5,       0.0);        ( 385201.8, 3740178.0,      12.2,      12.2,
0.0);
( 385185.1, 3740215.4,      12.2,      12.2,       0.0);        ( 385146.0, 3740273.6,      11.9,      11.9,
0.0);
( 385130.9, 3740293.5,      11.6,      11.6,       0.0);        ( 384935.7, 3739946.9,      10.7,      10.7,
0.0);
( 384890.3, 3739869.6,      10.3,      10.3,       0.0);        ( 384835.3, 3739778.0,       9.5,       9.5,
0.0);
( 384797.9, 3739708.7,       8.8,       8.8,       0.0);
```


*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** METEOROLOGICAL DAYS SELECTED FOR PROCESSING ***
(1=YES; 0=NO)

```
          1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
          1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
          1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1 1 1  1 1 1 1 1 1 1 1
1 1
```

1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1 1
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1 1
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1 1
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1 1
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1

NOTE: METEOROLOGICAL DATA ACTUALLY PROCESSED WILL ALSO DEPEND ON WHAT IS INCLUDED IN THE DATA FILE.

*** UPPER BOUND OF FIRST THROUGH FIFTH WIND SPEED CATEGORIES ***
(METERS/SEC)

1.54,   3.09,   5.14,   8.23, 10.80,

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** UP TO THE FIRST 24 HOURS OF METEOROLOGICAL DATA ***

Surface file: C:\Users\jclar\OneDrive\Clark and Associates\Project 316 - ABJC - KPAC Coil Aven   Met Version: 22112
Profile file: C:\Users\jclar\OneDrive\Clark and Associates\Project 316 - ABJC - KPAC Coil Aven
Surface format: FREE

Profile format: FREE

Surface station no.:   23129   Upper air station no.:   3190
Name: UNKNOWN   Name: UNKNOWN
Year: 2015   Year: 2015

First 24 hours of scalar data

YR	MO	DY	JDY	HR	H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O LEN	Z0	BOWEN	ALBEDO	REF WS	WD	HT	REF TA	HT
15	01	01	1	01	-5.1	0.092	-9.000	-9.000	-999.	67.	13.8	0.10	2.80	1.00	1.11	68.	7.9	278.1	2.0
15	01	01	1	02	-3.0	0.069	-9.000	-9.000	-999.	43.	10.0	0.04	2.80	1.00	0.97	292.	7.9	277.0	2.0
15	01	01	1	03	-6.3	0.106	-9.000	-9.000	-999.	83.	17.1	0.26	2.80	1.00	0.96	36.	7.9	277.0	2.0
15	01	01	1	04	-3.6	0.074	-9.000	-9.000	-999.	48.	10.1	0.03	2.80	1.00	1.14	327.	7.9	277.0	2.0
15	01	01	1	05	-5.3	0.089	-9.000	-9.000	-999.	63.	11.9	0.03	2.80	1.00	1.40	336.	7.9	275.9	2.0
15	01	01	1	06	-2.4	0.063	-9.000	-9.000	-999.	38.	9.2	0.03	2.80	1.00	0.91	331.	7.9	275.9	2.0
15	01	01	1	07	-5.5	0.091	-9.000	-9.000	-999.	66.	12.2	0.03	2.80	1.00	1.43	334.	7.9	275.9	2.0
15	01	01	1	08	-8.0	0.128	-9.000	-9.000	-999.	110.	23.9	0.32	2.80	0.54	1.06	19.	7.9	277.0	2.0
15	01	01	1	09	35.4	0.235	0.419	0.005	75.	273.	-33.3	0.26	2.80	0.31	1.72	34.	7.9	280.3	2.0
15	01	01	1	10	107.7	0.338	0.964	0.005	303.	472.	-32.7	0.26	2.80	0.24	2.47	49.	7.9	283.1	2.0
15	01	01	1	11	158.7	0.344	1.624	0.005	984.	483.	-23.3	0.10	2.80	0.21	3.22	69.	7.9	285.9	2.0
15	01	01	1	12	183.1	0.240	1.811	0.005	1180.	288.	-6.9	0.10	2.80	0.20	1.94	65.	7.9	285.9	2.0

```
 15 01 01   1 13  182.2  0.203  1.892  0.005 1353.  220.     -4.2  0.10   2.80   0.20    1.52   64.    7.9  287.5
 2.0
 15 01 01   1 14  154.0  0.343  1.832  0.005 1453.  482.    -23.7  0.22   2.80   0.21    2.55  199.    7.9  287.0
 2.0
 15 01 01   1 15  101.0  0.367  1.614  0.005 1515.  534.    -44.6  0.37   2.80   0.24    2.45  212.    7.9  287.0
 2.0
 15 01 01   1 16   27.2  0.330  1.046  0.005 1530.  455.   -119.6  0.22   2.80   0.33    2.78  202.    7.9  286.4
 2.0
 15 01 01   1 17  -29.6  0.335 -9.000 -9.000 -999.  465.    123.4  0.37   2.80   0.60    2.45  214.    7.9  285.9
 2.0
 15 01 01   1 18  -27.0  0.271 -9.000 -9.000 -999.  340.     80.6  0.40   2.80   1.00    1.94  245.    7.9  285.3
 2.0
 15 01 01   1 19 -999.0 -9.000 -9.000 -9.000 -999. -999. -99999.0  0.18   2.80   1.00    0.00    0.    7.9  284.2
 2.0
 15 01 01   1 20 -999.0 -9.000 -9.000 -9.000 -999. -999. -99999.0  0.18   2.80   1.00    0.00    0.    7.9  282.0
 2.0
 15 01 01   1 21 -999.0 -9.000 -9.000 -9.000 -999. -999. -99999.0  0.18   2.80   1.00    0.00    0.    7.9  281.4
 2.0
 15 01 01   1 22 -999.0 -9.000 -9.000 -9.000 -999. -999. -99999.0  0.18   2.80   1.00    0.00    0.    7.9  280.9
 2.0
 15 01 01   1 23 -999.0 -9.000 -9.000 -9.000 -999. -999. -99999.0  0.18   2.80   1.00    0.00    0.    7.9  280.3
 2.0
 15 01 01   1 24 -999.0 -9.000 -9.000 -9.000 -999. -999. -99999.0  0.18   2.80   1.00    0.00    0.    7.9  279.8
 2.0


 First hour of profile data
 YR MO DY HR HEIGHT F  WDIR    WSPD AMB_TMP sigmaA  sigmaW  sigmaV
 15 01 01 01    7.9 1   68.    1.11   278.2   99.0  -99.00  -99.00

 F indicates top of profile (=1) or below (=0)
 *** AERMOD - VERSION 22112  ***   ***  KPAC COIL AVENUE FREEZER EXPANSION PROJECT                          ***
     05/19/25
 *** AERMET - VERSION  22112 ***   ***  1420 Coil Avenue, Wilmington, CA 90074                              ***
   11:56:38

   PAGE  15
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  URBAN  ADJ_U*

                           *** THE PERIOD ( 43824 HRS) AVERAGE CONCENTRATION   VALUES FOR SOURCE GROUP: ALL
***
                               INCLUDING SOURCE(S):     IA0AM1RA    ,

                                        *** DISCRETE CARTESIAN RECEPTOR POINTS ***

                                     ** CONC OF DPM      IN MICROGRAMS/M**3                        **

       X-COORD (M)   Y-COORD (M)        CONC                      X-COORD (M)   Y-COORD (M)        CONC
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
 - - - - - - - -
        384875.40    3739981.50        0.00230                     384885.40    3739981.50        0.00255

        384895.40    3739981.50        0.00283                     384905.40    3739981.50        0.00317

        384915.40    3739981.50        0.00357                     384925.40    3739981.50        0.00402

        384935.40    3739981.50        0.00457                     384875.40    3739991.50        0.00245

        384885.40    3739991.50        0.00274                     384895.40    3739991.50        0.00308

        384905.40    3739991.50        0.00348                     384915.40    3739991.50        0.00397

        384925.40    3739991.50        0.00459                     384935.40    3739991.50        0.00532

        384945.40    3739991.50        0.00627                     384875.40    3740001.50        0.00256

        384885.40    3740001.50        0.00289                     384895.40    3740001.50        0.00327

        384905.40    3740001.50        0.00374                     384915.40    3740001.50        0.00431
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384925.40	3740001.50	0.00503	384935.40	3740001.50	0.00596
384945.40	3740001.50	0.00718	384875.40	3740011.50	0.00264
384885.40	3740011.50	0.00298	384895.40	3740011.50	0.00339
384905.40	3740011.50	0.00390	384915.40	3740011.50	0.00454
384925.40	3740011.50	0.00532	384935.40	3740011.50	0.00634
384945.40	3740011.50	0.00769	384955.40	3740011.50	0.00951
384875.40	3740021.50	0.00266	384885.40	3740021.50	0.00302
384895.40	3740021.50	0.00344	384905.40	3740021.50	0.00396
384915.40	3740021.50	0.00462	384925.40	3740021.50	0.00542
384935.40	3740021.50	0.00646	384945.40	3740021.50	0.00783
384955.40	3740021.50	0.00967	384875.40	3740031.50	0.00265
384885.40	3740031.50	0.00300	384895.40	3740031.50	0.00342
384905.40	3740031.50	0.00394	384915.40	3740031.50	0.00457
384925.40	3740031.50	0.00536	384935.40	3740031.50	0.00639
384945.40	3740031.50	0.00773	384955.40	3740031.50	0.00958
384965.40	3740031.50	0.01237	384875.40	3740041.50	0.00259
384885.40	3740041.50	0.00293	384895.40	3740041.50	0.00334
384905.40	3740041.50	0.00383	384915.40	3740041.50	0.00444
384925.40	3740041.50	0.00521	384935.40	3740041.50	0.00620
384945.40	3740041.50	0.00752	384955.40	3740041.50	0.00937
384965.40	3740041.50	0.01230	384875.40	3740051.50	0.00251
384885.40	3740051.50	0.00283	384895.40	3740051.50	0.00321
384905.40	3740051.50	0.00368	384915.40	3740051.50	0.00426
384925.40	3740051.50	0.00500	384935.40	3740051.50	0.00595
384945.40	3740051.50	0.00723	384955.40	3740051.50	0.00906
384965.40	3740051.50	0.01193	384975.40	3740051.50	0.01656
384705.10	3739971.50	0.00064	384715.10	3739971.50	0.00067
384725.10	3739971.50	0.00071	384735.10	3739971.50	0.00076
384745.10	3739971.50	0.00081	384755.10	3739971.50	0.00086
384765.10	3739971.50	0.00091	384775.10	3739971.50	0.00098

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): IA0AM1RA ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
384785.10	3739971.50	0.00104	384795.10	3739971.50	0.00112
384805.10	3739971.50	0.00120	384815.10	3739971.50	0.00130
384825.10	3739971.50	0.00140	384835.10	3739971.50	0.00151
384845.10	3739971.50	0.00164	384855.10	3739971.50	0.00178
384705.10	3739981.50	0.00064	384715.10	3739981.50	0.00068
384725.10	3739981.50	0.00072	384735.10	3739981.50	0.00077
384745.10	3739981.50	0.00082	384755.10	3739981.50	0.00087
384765.10	3739981.50	0.00093	384775.10	3739981.50	0.00100
384785.10	3739981.50	0.00107	384795.10	3739981.50	0.00115
384805.10	3739981.50	0.00124	384815.10	3739981.50	0.00134
384825.10	3739981.50	0.00146	384835.10	3739981.50	0.00159
384845.10	3739981.50	0.00173	384855.10	3739981.50	0.00189
384865.10	3739981.50	0.00208	384705.10	3739991.50	0.00065
384715.10	3739991.50	0.00069	384725.10	3739991.50	0.00073
384735.10	3739991.50	0.00078	384745.10	3739991.50	0.00083
384755.10	3739991.50	0.00088	384765.10	3739991.50	0.00095
384775.10	3739991.50	0.00102	384785.10	3739991.50	0.00109
384795.10	3739991.50	0.00118	384805.10	3739991.50	0.00128
384815.10	3739991.50	0.00139	384825.10	3739991.50	0.00151
384835.10	3739991.50	0.00165	384845.10	3739991.50	0.00180
384855.10	3739991.50	0.00198	384865.10	3739991.50	0.00220
384705.10	3740001.50	0.00065	384715.10	3740001.50	0.00069
384725.10	3740001.50	0.00073	384735.10	3740001.50	0.00078
384745.10	3740001.50	0.00083	384755.10	3740001.50	0.00089
384765.10	3740001.50	0.00096	384775.10	3740001.50	0.00103
384785.10	3740001.50	0.00111	384795.10	3740001.50	0.00120
384805.10	3740001.50	0.00130	384815.10	3740001.50	0.00141
384825.10	3740001.50	0.00154	384835.10	3740001.50	0.00169
384845.10	3740001.50	0.00186	384855.10	3740001.50	0.00206

384865.10	3740001.50	0.00229	384705.10	3740011.50	0.00065
384715.10	3740011.50	0.00069	384725.10	3740011.50	0.00073
384735.10	3740011.50	0.00078	384745.10	3740011.50	0.00083
384755.10	3740011.50	0.00089	384765.10	3740011.50	0.00096
384775.10	3740011.50	0.00103	384785.10	3740011.50	0.00112
384795.10	3740011.50	0.00121	384805.10	3740011.50	0.00131
384815.10	3740011.50	0.00143	384825.10	3740011.50	0.00156
384835.10	3740011.50	0.00172	384845.10	3740011.50	0.00189
384855.10	3740011.50	0.00210	384865.10	3740011.50	0.00235
384705.10	3740021.50	0.00064	384715.10	3740021.50	0.00068
384725.10	3740021.50	0.00073	384735.10	3740021.50	0.00078

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): IA0AM1RA ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
384745.10	3740021.50	0.00083	384755.10	3740021.50	0.00089
384765.10	3740021.50	0.00095	384775.10	3740021.50	0.00103
384785.10	3740021.50	0.00111	384795.10	3740021.50	0.00121
384805.10	3740021.50	0.00131	384815.10	3740021.50	0.00143
384825.10	3740021.50	0.00157	384835.10	3740021.50	0.00173
384845.10	3740021.50	0.00191	384855.10	3740021.50	0.00212
384865.10	3740021.50	0.00236	384705.10	3740031.50	0.00064
384715.10	3740031.50	0.00068	384725.10	3740031.50	0.00072
384735.10	3740031.50	0.00077	384745.10	3740031.50	0.00082
384755.10	3740031.50	0.00088	384765.10	3740031.50	0.00095
384775.10	3740031.50	0.00102	384785.10	3740031.50	0.00110
384795.10	3740031.50	0.00119	384805.10	3740031.50	0.00130
384815.10	3740031.50	0.00142	384825.10	3740031.50	0.00155
384835.10	3740031.50	0.00171	384845.10	3740031.50	0.00189

384855.10	3740031.50	0.00210	384865.10	3740031.50	0.00235
384705.10	3740041.50	0.00063	384715.10	3740041.50	0.00067
384725.10	3740041.50	0.00071	384735.10	3740041.50	0.00076
384745.10	3740041.50	0.00081	384755.10	3740041.50	0.00087
384765.10	3740041.50	0.00093	384775.10	3740041.50	0.00100
384785.10	3740041.50	0.00108	384795.10	3740041.50	0.00118
384805.10	3740041.50	0.00128	384815.10	3740041.50	0.00139
384825.10	3740041.50	0.00153	384835.10	3740041.50	0.00168
384845.10	3740041.50	0.00185	384855.10	3740041.50	0.00206
384865.10	3740041.50	0.00230	384785.10	3740051.50	0.00106
384795.10	3740051.50	0.00114	384805.10	3740051.50	0.00124
384815.10	3740051.50	0.00135	384825.10	3740051.50	0.00148
384835.10	3740051.50	0.00163	384845.10	3740051.50	0.00180
384855.10	3740051.50	0.00200	384713.90	3739875.30	0.00047
384723.90	3739875.30	0.00048	384733.90	3739875.30	0.00050
384743.90	3739875.30	0.00052	384753.90	3739875.30	0.00053
384763.90	3739875.30	0.00055	384773.90	3739875.30	0.00057
384783.90	3739875.30	0.00058	384793.90	3739875.30	0.00060
384803.90	3739875.30	0.00062	384813.90	3739875.30	0.00064
384823.90	3739875.30	0.00066	384833.90	3739875.30	0.00068
384843.90	3739875.30	0.00069	384853.90	3739875.30	0.00071
384863.90	3739875.30	0.00073	384873.90	3739875.30	0.00075
384713.90	3739885.30	0.00050	384723.90	3739885.30	0.00051
384733.90	3739885.30	0.00053	384743.90	3739885.30	0.00055
384753.90	3739885.30	0.00057	384763.90	3739885.30	0.00059
384773.90	3739885.30	0.00061	384783.90	3739885.30	0.00063

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): IA0AM1RA ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC

384793.90	3739885.30	0.00065	384803.90	3739885.30	0.00067
384813.90	3739885.30	0.00069	384823.90	3739885.30	0.00072
384833.90	3739885.30	0.00074	384843.90	3739885.30	0.00076
384853.90	3739885.30	0.00079	384863.90	3739885.30	0.00081
384873.90	3739885.30	0.00083	384883.90	3739885.30	0.00086
384713.90	3739895.30	0.00052	384723.90	3739895.30	0.00054
384733.90	3739895.30	0.00056	384743.90	3739895.30	0.00058
384753.90	3739895.30	0.00061	384763.90	3739895.30	0.00063
384773.90	3739895.30	0.00065	384783.90	3739895.30	0.00068
384793.90	3739895.30	0.00070	384803.90	3739895.30	0.00073
384813.90	3739895.30	0.00075	384823.90	3739895.30	0.00078
384833.90	3739895.30	0.00081	384843.90	3739895.30	0.00084
384853.90	3739895.30	0.00087	384863.90	3739895.30	0.00090
384873.90	3739895.30	0.00093	384883.90	3739895.30	0.00096
384713.90	3739905.30	0.00055	384723.90	3739905.30	0.00057
384733.90	3739905.30	0.00060	384743.90	3739905.30	0.00062
384753.90	3739905.30	0.00064	384763.90	3739905.30	0.00067
384773.90	3739905.30	0.00070	384783.90	3739905.30	0.00073
384793.90	3739905.30	0.00076	384803.90	3739905.30	0.00079
384813.90	3739905.30	0.00082	384823.90	3739905.30	0.00085
384833.90	3739905.30	0.00088	384843.90	3739905.30	0.00092
384853.90	3739905.30	0.00095	384863.90	3739905.30	0.00099
384873.90	3739905.30	0.00103	384883.90	3739905.30	0.00107
384893.90	3739905.30	0.00111	384713.90	3739915.30	0.00057
384723.90	3739915.30	0.00060	384733.90	3739915.30	0.00063
384743.90	3739915.30	0.00065	384753.90	3739915.30	0.00068
384763.90	3739915.30	0.00071	384773.90	3739915.30	0.00074
384783.90	3739915.30	0.00078	384793.90	3739915.30	0.00081
384803.90	3739915.30	0.00085	384813.90	3739915.30	0.00089
384823.90	3739915.30	0.00093	384833.90	3739915.30	0.00097
384843.90	3739915.30	0.00101	384853.90	3739915.30	0.00105
384863.90	3739915.30	0.00110	384873.90	3739915.30	0.00115
384883.90	3739915.30	0.00120	384893.90	3739915.30	0.00125
384903.90	3739915.30	0.00130	384713.90	3739925.30	0.00060

384723.90	3739925.30	0.00063	384733.90	3739925.30	0.00066
384743.90	3739925.30	0.00069	384753.90	3739925.30	0.00072
384763.90	3739925.30	0.00076	384773.90	3739925.30	0.00079
384783.90	3739925.30	0.00083	384793.90	3739925.30	0.00087
384803.90	3739925.30	0.00092	384813.90	3739925.30	0.00096
384823.90	3739925.30	0.00101	384833.90	3739925.30	0.00106

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): IA0AM1RA ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
384843.90	3739925.30	0.00111	384853.90	3739925.30	0.00117
384863.90	3739925.30	0.00122	384873.90	3739925.30	0.00128
384883.90	3739925.30	0.00135	384893.90	3739925.30	0.00141
384903.90	3739925.30	0.00148	384713.90	3739935.30	0.00062
384723.90	3739935.30	0.00065	384733.90	3739935.30	0.00068
384743.90	3739935.30	0.00072	384753.90	3739935.30	0.00076
384763.90	3739935.30	0.00079	384773.90	3739935.30	0.00084
384783.90	3739935.30	0.00088	384793.90	3739935.30	0.00093
384803.90	3739935.30	0.00098	384813.90	3739935.30	0.00104
384823.90	3739935.30	0.00109	384833.90	3739935.30	0.00116
384843.90	3739935.30	0.00122	384853.90	3739935.30	0.00129
384863.90	3739935.30	0.00137	384873.90	3739935.30	0.00144
384883.90	3739935.30	0.00152	384893.90	3739935.30	0.00161
384903.90	3739935.30	0.00170	384913.90	3739935.30	0.00179
384713.90	3739945.30	0.00064	384723.90	3739945.30	0.00067
384733.90	3739945.30	0.00071	384743.90	3739945.30	0.00075
384753.90	3739945.30	0.00079	384763.90	3739945.30	0.00083
384773.90	3739945.30	0.00088	384783.90	3739945.30	0.00093
384793.90	3739945.30	0.00099	384803.90	3739945.30	0.00105

384813.90	3739945.30	0.00111	384823.90	3739945.30	0.00118
384833.90	3739945.30	0.00126	384843.90	3739945.30	0.00134
384853.90	3739945.30	0.00142	384863.90	3739945.30	0.00151
384873.90	3739945.30	0.00161	384883.90	3739945.30	0.00171
384893.90	3739945.30	0.00182	384903.90	3739945.30	0.00194
384913.90	3739945.30	0.00207	384783.90	3739955.30	0.00098
384793.90	3739955.30	0.00104	384803.90	3739955.30	0.00111
384813.90	3739955.30	0.00118	384823.90	3739955.30	0.00126
384833.90	3739955.30	0.00135	384843.90	3739955.30	0.00145
384853.90	3739955.30	0.00156	384863.90	3739955.30	0.00167
384873.90	3739955.30	0.00180	384883.90	3739955.30	0.00193
384893.90	3739955.30	0.00208	384903.90	3739955.30	0.00223
384913.90	3739955.30	0.00240	384923.90	3739955.30	0.00260
384717.20	3739782.40	0.00028	384727.20	3739782.40	0.00029
384737.20	3739782.40	0.00029	384747.20	3739782.40	0.00030
384757.20	3739782.40	0.00030	384767.20	3739782.40	0.00030
384777.20	3739782.40	0.00031	384787.20	3739782.40	0.00031
384797.20	3739782.40	0.00031	384807.20	3739782.40	0.00032
384817.20	3739782.40	0.00032	384827.20	3739782.40	0.00032
384717.20	3739792.40	0.00030	384727.20	3739792.40	0.00030
384737.20	3739792.40	0.00031	384747.20	3739792.40	0.00031

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): IA0AM1RA ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
384757.20	3739792.40	0.00032	384767.20	3739792.40	0.00032
384777.20	3739792.40	0.00033	384787.20	3739792.40	0.00033
384797.20	3739792.40	0.00033	384807.20	3739792.40	0.00034
384817.20	3739792.40	0.00034	384827.20	3739792.40	0.00035

384717.20	3739802.40	0.00032	384727.20	3739802.40	0.00032
384737.20	3739802.40	0.00033	384747.20	3739802.40	0.00033
384757.20	3739802.40	0.00034	384767.20	3739802.40	0.00034
384777.20	3739802.40	0.00035	384787.20	3739802.40	0.00035
384797.20	3739802.40	0.00036	384807.20	3739802.40	0.00036
384817.20	3739802.40	0.00037	384827.20	3739802.40	0.00037
384837.20	3739802.40	0.00038	384717.20	3739812.40	0.00033
384727.20	3739812.40	0.00034	384737.20	3739812.40	0.00035
384747.20	3739812.40	0.00035	384757.20	3739812.40	0.00036
384767.20	3739812.40	0.00037	384777.20	3739812.40	0.00037
384787.20	3739812.40	0.00038	384797.20	3739812.40	0.00038
384807.20	3739812.40	0.00039	384817.20	3739812.40	0.00039
384827.20	3739812.40	0.00040	384837.20	3739812.40	0.00041
384847.20	3739812.40	0.00041	384717.20	3739822.40	0.00035
384727.20	3739822.40	0.00036	384737.20	3739822.40	0.00037
384747.20	3739822.40	0.00038	384757.20	3739822.40	0.00038
384767.20	3739822.40	0.00039	384777.20	3739822.40	0.00040
384787.20	3739822.40	0.00041	384797.20	3739822.40	0.00041
384807.20	3739822.40	0.00042	384817.20	3739822.40	0.00042
384827.20	3739822.40	0.00043	384837.20	3739822.40	0.00044
384847.20	3739822.40	0.00045	384717.20	3739832.40	0.00037
384727.20	3739832.40	0.00038	384737.20	3739832.40	0.00039
384747.20	3739832.40	0.00040	384757.20	3739832.40	0.00041
384767.20	3739832.40	0.00042	384777.20	3739832.40	0.00043
384787.20	3739832.40	0.00043	384797.20	3739832.40	0.00044
384807.20	3739832.40	0.00045	384817.20	3739832.40	0.00046
384827.20	3739832.40	0.00047	384837.20	3739832.40	0.00047
384847.20	3739832.40	0.00048	384857.20	3739832.40	0.00049
384717.20	3739842.40	0.00039	384727.20	3739842.40	0.00040
384737.20	3739842.40	0.00041	384747.20	3739842.40	0.00042
384757.20	3739842.40	0.00044	384767.20	3739842.40	0.00045
384777.20	3739842.40	0.00046	384787.20	3739842.40	0.00047
384797.20	3739842.40	0.00048	384807.20	3739842.40	0.00049
384817.20	3739842.40	0.00050	384827.20	3739842.40	0.00051

384837.20	3739842.40	0.00052	384847.20	3739842.40	0.00053
384857.20	3739842.40	0.00054	384717.20	3739852.40	0.00042

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): IA0AM1RA ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
384727.20	3739852.40	0.00043	384737.20	3739852.40	0.00044
384747.20	3739852.40	0.00045	384757.20	3739852.40	0.00046
384767.20	3739852.40	0.00048	384777.20	3739852.40	0.00049
384787.20	3739852.40	0.00050	384797.20	3739852.40	0.00051
384807.20	3739852.40	0.00052	384817.20	3739852.40	0.00054
384827.20	3739852.40	0.00055	384837.20	3739852.40	0.00056
384847.20	3739852.40	0.00057	384857.20	3739852.40	0.00058
384867.20	3739852.40	0.00060	384847.20	3739862.40	0.00062
384857.20	3739862.40	0.00064	384867.20	3739862.40	0.00065
384877.20	3739862.40	0.00067	384744.00	3739711.20	0.00020
384754.00	3739711.20	0.00020	384764.00	3739711.20	0.00020
384774.00	3739711.20	0.00020	384784.00	3739711.20	0.00020
384744.00	3739721.20	0.00021	384754.00	3739721.20	0.00021
384764.00	3739721.20	0.00021	384774.00	3739721.20	0.00021
384784.00	3739721.20	0.00021	384724.00	3739731.20	0.00022
384734.00	3739731.20	0.00022	384744.00	3739731.20	0.00022
384754.00	3739731.20	0.00022	384764.00	3739731.20	0.00022
384774.00	3739731.20	0.00022	384784.00	3739731.20	0.00022
384794.00	3739731.20	0.00023	384724.00	3739741.20	0.00023
384734.00	3739741.20	0.00023	384744.00	3739741.20	0.00023
384754.00	3739741.20	0.00023	384764.00	3739741.20	0.00023
384774.00	3739741.20	0.00024	384784.00	3739741.20	0.00024
384794.00	3739741.20	0.00024	384724.00	3739751.20	0.00024

384734.00	3739751.20	0.00024	384744.00	3739751.20	0.00025
384754.00	3739751.20	0.00025	384764.00	3739751.20	0.00025
384774.00	3739751.20	0.00025	384784.00	3739751.20	0.00025
384794.00	3739751.20	0.00025	384804.00	3739751.20	0.00026
384734.00	3739761.20	0.00026	384744.00	3739761.20	0.00026
384754.00	3739761.20	0.00026	384764.00	3739761.20	0.00026
384774.00	3739761.20	0.00027	384784.00	3739761.20	0.00027
384794.00	3739761.20	0.00027	384804.00	3739761.20	0.00027
384814.00	3739761.20	0.00028	384800.20	3739699.10	0.00019
384822.60	3739698.30	0.00020	384836.90	3739697.50	0.00021
384946.10	3739893.50	0.00128	385150.00	3739908.70	0.00382
385185.10	3739994.70	0.00423	385204.20	3740061.60	0.00218
385213.80	3740131.80	0.00095	385201.80	3740178.00	0.00095
385185.10	3740215.40	0.00124	385146.00	3740273.60	0.00223
385130.90	3740293.50	0.00246	384935.70	3739946.90	0.00247
384890.30	3739869.60	0.00075	384835.30	3739778.00	0.00032
384797.90	3739708.70	0.00020			

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** THE SUMMARY OF MAXIMUM PERIOD (43824 HRS) RESULTS ***

** CONC OF DPM IN MICROGRAMS/M**3 **

NETWORK GROUP ID		AVERAGE CONC	RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG)	OF TYPE GRID-ID
ALL	1ST HIGHEST VALUE IS	0.01656	AT (384975.40, 3740051.50, 11.02, 11.02, 0.00)	DC
	2ND HIGHEST VALUE IS	0.01237	AT (384965.40, 3740031.50, 11.02, 11.02, 0.00)	DC
	3RD HIGHEST VALUE IS	0.01230	AT (384965.40, 3740041.50, 11.08, 11.08, 0.00)	DC
	4TH HIGHEST VALUE IS	0.01193	AT (384965.40, 3740051.50, 11.22, 11.22, 0.00)	DC
	5TH HIGHEST VALUE IS	0.00967	AT (384955.40, 3740021.50, 11.02, 11.02, 0.00)	DC
	6TH HIGHEST VALUE IS	0.00958	AT (384955.40, 3740031.50, 11.17, 11.17, 0.00)	DC
	7TH HIGHEST VALUE IS	0.00951	AT (384955.40, 3740011.50, 10.87, 10.87, 0.00)	DC
	8TH HIGHEST VALUE IS	0.00937	AT (384955.40, 3740041.50, 11.33, 11.33, 0.00)	DC

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         9TH HIGHEST VALUE IS       0.00906 AT (  384955.40,  3740051.50,    11.48,    11.48,    0.00)  DC

        10TH HIGHEST VALUE IS       0.00783 AT (  384945.40,  3740021.50,    11.17,    11.17,    0.00)  DC


 *** RECEPTOR TYPES:  GC = GRIDCART
                      GP = GRIDPOLR
                      DC = DISCCART
                      DP = DISCPOLR
 *** AERMOD - VERSION 22112  ***   ***  KPAC COIL AVENUE FREEZER EXPANSION PROJECT                          ***
     05/19/25
 *** AERMET - VERSION  22112 ***   ***  1420 Coil Avenue, Wilmington, CA 90074                             ***
   11:56:38

   PAGE  23
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  URBAN  ADJ_U*

 *** Message Summary : AERMOD Model Execution ***

  --------- Summary of Total Messages --------

 A Total of            0 Fatal Error Message(s)
 A Total of            5 Warning Message(s)
 A Total of          916 Informational Message(s)

 A Total of        43824 Hours Were Processed

 A Total of          689 Calm Hours Identified

 A Total of          227 Missing Hours Identified (  0.52 Percent)


    ******** FATAL ERROR MESSAGES ********
               ***  NONE  ***


    ********   WARNING MESSAGES   ********
 CO W320      11       URBOPT: Input Parameter May Be Out-of-Range for Parameter       URB-POP
 ME W186    1143       MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used          0.50
 ME W187    1143       MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET
 OU W565    1147       PERPLT: Possible Conflict With Dynamically Allocated FUNIT     PLOTFILE
 OU W565    1148       PERPST: Possible Conflict With Dynamically Allocated FUNIT     POSTFILE

    ************************************
    *** AERMOD Finishes Successfully ***
    ************************************
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Exhibit C

Risk Calculations

Risk Calculations For Diesel Exhaust

$Risk_{inh\text{-}res} = Dose_{air} * CPF * ASF * ED/AT$

$Dose_{air} = C_{air} * \{BR/BW\} * A * EF * 10^{-6}$

Variable	Description	Units	Value
$Risk_{inh\text{-}air}$	Residential inhalation cancer risk	Unitless	Calculated
$Dose_{air}$	Daily inhalation dose	mg/kg-day	Calculated
CPF	Inhalation cancer potency factor	$(mg/kg\text{-}day)^{-1}$	Chemical Specific
ASF	Age sensitivity factor for a specified age group	Unitless	Calculated
ED	Exposure duration (in years) for a specified age group	years	Calculated
AT	Averaging time for lifetime caner risk	years	70
FAH	Fraction of time spent at home	Unitless	Calculated

Variable	Description	Units	Value
$Dose_{air}$	Daily inhalation dose	mg/kg-day	Calculated
C_{air}	Concentration in air	ug/m^3	**0.01656**
{BR/BW}	Daily Breathing rate normalized to body weight	L/kg body weight-day	Calculated
A	Inhalation absorption fraction	Unitless	1
EF	Exposure frequency (days/365 days)	Unitless	Calculated
10^{-6}	migrograms to milligrams conversion, liters to cubic meters conversion	Unitless	Calculated

1.07E+06

Residential Exposures

Age Group	Risk	Age Sensitivity	FAH	ED	CPF	Dose Air	Cair	BR/BW	A	EF
3rd Trimester	2.25E-01	10	1	0.25	1.1	5.73E-06	0.01656	361	1	0.958904
0-1	2.04E+00	10	1	0.75	1.1	1.73E-05	0.01656	1090	1	0.958904
1-2	0.00E+00	10	1	0	1.1	1.73E-05	0.01656	1090	1	0.958904
2-3	0.00E+00	3	0.72	0	1.1	9.08E-06	0.01656	572	1	0.958904
3-4	0.00E+00	3	0.72	0	1.1	9.08E-06	0.01656	572	1	0.958904
2<9	0.00E+00	3	0.72	0	1.1	1.37E-05	0.01656	861	1	0.958904
2<16	0.00E+00	3	0.72	0	1.1	1.18E-05	0.01656	745	1	0.958904
16<30	0.00E+00	1	0.73	0	1.1	5.32E-06	0.01656	335	1	0.958904
16-70	0.00E+00	1	0.73	0	1.1	4.61E-06	0.01656	290	1	0.958904

3rd trimeseter to 1	2.27
3rd trimester to 30	2.27
3rd trimester to 70	**2.27**

ATTACHMENT B

WILSON IHRIG
ACOUSTICS, NOISE & VIBRATION

CALIFORNIA
WASHINGTON
NEW YORK

WI #25-001.xx

May 22, 2025

Andrew J. Graf
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

SUBJECT: KPAC Coil Avenue Freezer Expansion Project
Wilmington, CA
Review and Comment on Noise Study

Dear Mr. Graf,

Per your request, Wilson Ihrig has reviewed the information and noise impact analysis in the following documents:

KPAC Coil Avenue Freezer Expansion Project
Initial Study/Negative Declaration (IS/ND)
Noise Study, 2024 (2024 Noise Study)
Noise Study, 2022 (2022 Noise Study)

The KPAC Coil Avenue Freezer Expansion (Project) would result in the expansion of the existing cold storage facility, which includes demolition and alteration of the existing cold dock for a new freezer. The improved facility would be expanding to the west and would result in the removal of the existing portion of a double rail spur. The project would also involve the expansion of mechanical and electrical rooms and the construction of a fire pump building. Following the expansion, the facility will add a Saturday work shift. The site is surrounded by industrial uses to the north, east, and south and single-family residences to the west across Drumm Avenue.

Wilson Ihrig, Acoustical Consultants, has practiced exclusively in the field of acoustics since 1966. During our almost 59 years of operation, we have prepared hundreds of noise studies for Environmental Impact Reports and Statements. We have one of the largest technical laboratories in the acoustical consulting industry. We also utilize industry-standard acoustical programs such as Roadway Construction Noise Model (RCNM), SoundPLAN, and CADNA. In short, we are well qualified to prepare environmental noise studies and review studies prepared by others.

Adverse Effects of Noise[1]

Although the health effects of noise are not taken as seriously in the United States as they are in other countries, they are real and, in many parts of the country, pervasive.

Noise-Induced Hearing Loss. If a person is repeatedly exposed to loud noises, he or she may experience noise-induced hearing impairment or loss. In the United States, both the Occupational Health and Safety Administration (OSHA) and the National Institute for Occupational Safety and Health (NIOSH) promote standards and regulations to protect the hearing of people exposed to high levels of industrial noise.

Speech Interference. Another common problem associated with noise is speech interference. In addition to the obvious issues that may arise from misunderstandings, speech interference also leads to problems with concentration fatigue, irritation, decreased working capacity, and automatic stress reactions. For complete speech intelligibility, the sound level of the speech should be 15 to 18 dBA higher than the background noise. Typical indoor speech levels are 45 to 50 dBA at 1 meter, so any noise above 30 dBA begins to interfere with speech intelligibility. The common reaction to higher background noise levels is to raise one's voice. If this is required persistently for long periods of time, stress reactions and irritation will likely result.

Sleep Disturbance. Noise can disturb sleep by making it more difficult to fall asleep, by waking someone after they are asleep, or by altering their sleep stage, e.g., reducing the amount of rapid eye movement (REM) sleep. Noise exposure for people who are sleeping has also been linked to increased blood pressure, increased heart rate, increase in body movements, and other physiological effects. Not surprisingly, people whose sleep is disturbed by noise often experience secondary effects such as cognitive decline, increased fatigue, depressed mood, and decreased work performance.

Cardiovascular and Physiological Effects. Human's bodily reactions to noise are rooted in the "fight or flight" response that evolved when many noises signaled imminent danger. These include increased blood pressure, elevated heart rate, and vasoconstriction. Prolonged exposure to acute noises can result in permanent effects such as hypertension and heart disease.

Impaired Cognitive Performance. Studies have established that noise exposure impairs people's abilities to perform complex tasks (tasks that require attention to detail or analytical processes) and it makes reading, paying attention, solving problems, and memorizing more difficult. This is why there are standards for classroom background noise levels and why offices and libraries are designed to provide quiet work environments.

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[1] More information on these and other adverse effects of noise may be found in *Guidelines for Community Noise*, eds B Berglund, T Lindvall, and D Schwela, World Health Organization, Geneva, Switzerland, 1999. (https://www.who.int/docstore/peh/noise/Comnoise-1.pdf)

Baseline Noise is Not Properly Established

The manner by which the IS/ND determined the existing noise environment is unsupported. The Project is surrounded by vehicle and rail traffic as well as existing residential and industrial uses. The noise analysis relies on six short-term measurements conducted on a Tuesday morning throughout the residential neighborhood across from the project. Sample time for the noise measurements was only 15 minutes, which does not capture the time-variable nature of traffic and rail noise, activity from the KPAC facility, or activity from other nearby industrial facilities. These 15 minutes represent less than 2% of both weekday allowable construction hours (7 A.M. – 9 P.M.) per the City of Los Angeles Municipal Code [2024 Noise Study, pg. 1] and of the 16 hours of weekday operation. The measurements also ignore the 24-hour cooling needs of a cold storage facility. Further, they do not address ambient levels during the new Saturday work shift. The 2024 Noise Study provides no evidence these measurements are typical and representative of the existing noise near the Project.

As shown in Figure 1, the reported existing noise levels along Drumm Avenue vary. The highest level was measured across from the existing cold dock. The Project should document the existing conditions at these homes throughout the operational hours of the facility, including Saturday.

The Project must conduct properly documented ambient measurements near sensitive receptors that fully capture the current baseline conditions during full daytime and nighttime hours to determine impact of construction and operational noise.

Figure 1: Noise Measurement Locations, Sensitive Receptors, and Measured Levels (dBA)

Construction Noise Levels Would be Potentially Significant

The IS/ND fails to disclose and mitigate the Project's potentially significant construction noise impacts. The predicted construction noise levels provided in the 2024 Noise Study appear to contain errors and lack documentation.

Table 2 of the 2024 Noise Study presents construction equipment by phase, including quantities and expected number of hours on site per day for each piece of equipment. The Table shows a calculated 1-hour Leq at 50 feet from the activity. The report states that these calculations were based on reference levels provided by the FHWA Roadway Construction Noise Model (RCNM) and refers to Attachment 2 for calculations [pg. 15]. The report claims that the 1-hour levels were inputted into a SoundPLAN model of the site, to generate levels at nearby sensitive receptors [pg. 16].

The 2024 Noise Study fails to present a Figure showing the SoundPLAN model. Attachment 2 contains result tables from SoundPLAN, which show the 1-hour Leq levels presented in Table 2 as reference levels for an area source representing each activity. Based on these tables, the closest receptor appears to be 59.26 meters (195 feet) from the area source modeled. The report text does not provide any explanation of how this distance was selected, nor does the IS/ND provide evidence verifying the actual distance between the Project site and nearby residential receptors. Of note, the distance of 195 feet conflicts with assumptions made as part of the 2024 Noise Study's evaluation of vibration impacts, where the analysis assumes that equipment would be operating within 85 feet of sensitive receptors. The IS/ND also reports that the nearest sensitive receptors are between 85 and 950 feet from the Project site.

Based on the activity levels shown in Table 2, adjusting for the distance shown in Attachment 2, demolition levels would be roughly 76 dBA at the closest residences, not accounting for any shielding or ground effects. The modeled demolition noise levels shown in Attachment 2 (79.6 dBA for Demolition at Site 1) don't match the levels shown in Table 3 (77.4 dBA for the same). Given these discrepancies, the 2024 Noise Study severely underestimated potential noise impacts to nearby residential receptors. Therefore, the underlying data does not support the 2024 Noise Study and ND's conclusion that impacts are less than significant.

The demolition levels presented by the 2024 Noise Study are 6 to 8 dB above the lowest ambient levels measured along Drumm Avenue. Per the 2006 City of Los Angeles CEQA Threshold Guide, construction activities lasting more than 10 days that exceed ambient noise levels by 5 dBA or more would be considered a significant impact.

The 2024 Noise Study argues "the City does not consider increase in daytime ambient levels resulting from construction activities as constituting significant environmental effects" [pg. 20], and instead relies on an absolute threshold of 80 dBA. However, construction noise levels may cause community annoyance, even if levels are below the 80-dBA absolute threshold. As shown in Figure 3-6 of the Federal Transit Authority Noise and Vibration Impact Assessment Manual Noise (FTA Manual)[2], which is based on actual case studies, community reaction to newly introduced noise gets stronger

[2] https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

as noise above existing levels increases. Reactions to increases between 5 to 10 dB varied from "widespread complaints" to "threats of legal action."

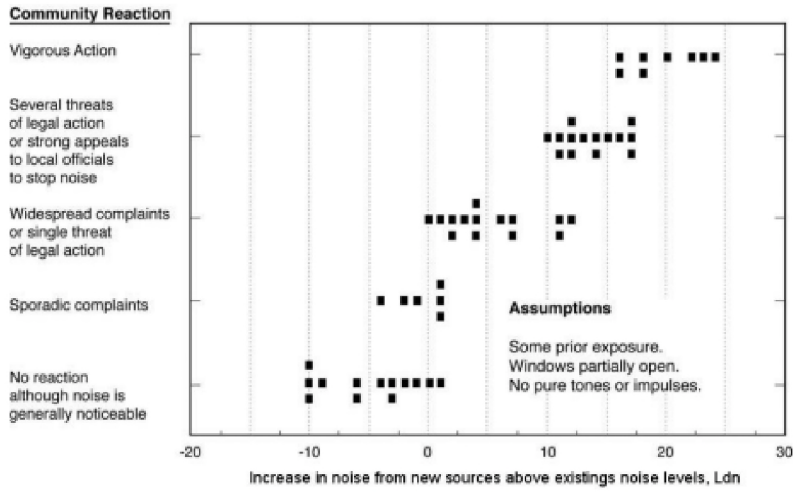

Figure 3-6 Community Reaction to New Noise, Relative to Existing Noise in a Residential Urban Environment

Figure 1 FTA Noise and Vibration Impact Assessment, Section on Construction Noise and Vibration (FTA page 18)

A previous version of the Noise Study dated December 2022 utilized a different significance threshold than 80 dBA to determine whether construction impacts are potentially significant. It cited Section 112.05 of the City of Los Angeles Municipal Code (LAMC), which prohibits construction equipment noise levels from exceeding 75 dBA at a distance of 50 feet between the hours of 7am and 10pm when in close proximity to any residential zone. Neither the IS/ND nor the 2024 Noise Study acknowledge the applicability of the ordinance to noise from construction equipment. Nor do they provide evidence demonstrating that the Project would comply with this requirement. However, the 2022 Noise Study acknowledges that the predicted demolition noise levels shown in Table 3 exceed this criterion.

In 2024 the City of Los Angeles adopted new construction noise and vibration thresholds, referenced in the 2024 Noise Study, titled "Construction Noise and Vibration – Updates to Thresholds and Methodology Report" [pg. 20]. This document provides no numerical threshold for daytime construction activities to assess "generation of a substantial temporary or permanent increase in ambient noise levels."[3] The 2024 Noise Study replaces the LAMC criteria with the 80-dBA threshold recommended in the updated guidelines. It does not reproduce the three noise questions set forth by Appendix G of the CEQA Guidelines, which were included in the 2022 Noise Study.

While the new City of Los Angeles guidance document ignores both the City Code and the CEQA Guidelines, it affirms the importance of protecting human health and it presents a methodology meant to take into account the distribution of construction equipment around a project site. The methodology outlined by the City is less conservative than the approach Wilson Ihrig would

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

recommend or that has been standard practice for CEQA analysis in the past. While the 2024 Noise Study adopts the City's 80 dBA threshold, it does not employ the recommended methodology for determining construction noise impacts,[4] which requires:

1. Calculating noise levels for each individual piece of equipment at the center of the site.
2. Calculating the noise level for the single noisiest piece of equipment at the perimeter of the site, using usage factors to adjust for power level *and* precent of time the equipment is used.
3. Combining the levels in Equations 1 and 2 to calculate a total level for the activity.

For the purposes of step 1 above, we will assume that the 195-foot distance shown in Attachment 2 is representative of the center of the site. The closest single-family residences appear to be 60 feet from the Project site. As noted above, the 2024 Noise Study evaluation of vibration impacts assumes that equipment would be operating within 85 feet of sensitive receptors. For the purposes of step 2, we show both 60 feet and 85 feet. Table 1 below shows a calculated 8-hour Leq of 82 dBA for the noisiest activity (demolition) based on the City of Los Angeles methodology. This level is 11 dB above the measured ambient level, above the 75-dBA LAMC criteria, and above the 80-dBA 8-hour Leq absolute threshold relied upon by the IS/ND.

Finally, the 2022 Noise Study shows information missing from Attachment 2 of the 2024 Noise Study regarding the RCNM reference levels used in the construction predictions. The Project arbitrarily selected "Actual Lmax" over "Spec Lmax" levels for some of the equipment on site, resulting in lower activity levels.

Table 1 Calculated 8-hour Leq for Demolition Activity at Single-family Residences

Equipment (Quantity)	**Lmax at 50 ft., dBA**	**Usage Factor, %**	**Hours per Day**	**Distance to Receptor, ft.**	**Leq (8-hr) at Receptor, dBA**
Equation 1					
concrete saw (1)	90	20		195	71
dozer (1)	82	40		195	66
tractor (3)	84	40		195	73
Equation 2					
concrete saw (1)	90	20	8	60	81
Equation 3					
				Total Demolition Noise:	**82**

[4] Although the City's updated guidelines permit the use of SoundPLAN as an alternative method, the deficiencies identified in this comment letter undermine the reliability of the conclusion presented in the 2024 Noise Study and ND.

Table 2 Calculated 8-hour Leq for Demolition Activity at Single-family Residences

Equipment (Quantity)	Lmax at 50 ft., dBA	Usage Factor, %	Hours per Day	Distance to Receptor, ft.	Leq (8-hr) at Receptor, dBA
Equation 1					
concrete saw (1)	90	20		195	71
dozer (1)	82	40		195	66
tractor (3)	84	40		195	73
Equation 2					
concrete saw (1)	90	20	8	85	78
Equation 3					
				Total Demolition Noise:	**80**

The errors and omissions in the underlying data render the construction noise analysis unreliable. Noise impacts must be re-evaluated utilizing a properly established ambient noise level. Mitigation measures such as enclosures, relocating staging areas and stationary equipment, temporary noise barriers, and noise monitoring should be considered to reduce potentially significant construction noise impacts.

Missing Operational Noise Analysis

The IS/ND fails to analyze mechanical noise. The Project includes expansion of mechanical and electrical rooms and the construction of a fire pump building. It also includes alteration of the existing cold dock for a new freezer and expanding the facility to the west, *closer to single-family homes.* The site plan provided in Figure 2 of the IS/ND [IS/ND pg. 14] is illegible and does not provide location of all new mechanical equipment. The Noise Study states that since "Section 112.02 of the LAMC, which prohibits equipment from causing more than a 5 dB increase in the ambient noise level. Therefore, operation of mechanical equipment on the Project building would not exceed the City's threshold of significance." This is a circular argument. The Project is not only adding new equipment on site but moving operations closer to nearby residences. The Noise Study does not present any empirical evidence demonstrating that the proposed Project would comply with the applicable ordinance. For example, it does not identify the type of equipment proposed or the decibel levels associated with the mechanical equipment.

The IS/ND also fails to analyze noise from truck activity on and off site. There is no discussion of increased traffic along Drumm Avenue, specifically from the extended hours of operation on Saturday. Further, there is no discussion of dock noise on site. The ambient measurements presented in the Noise Study indicate that noise levels are already higher at the homes near the existing cold dock, as shown in Figure 1 above. The dock is expected to move closer to the homes and extend operation into Saturday, both of which would result in an increased noise environment. As stated above, ambient noise levels were not properly established over the weekend.

The Project should provide a quantitative analysis of operational noise, including mechanical noise, traffic noise, and dock activity from the extension of the facility. If the increase is significant the Project must properly evaluate mitigation measures to reduce the impacts to less than significant.

Conclusion

The IS/ND fails to consider ambient-based significance criteria for noise impacts for construction and relies on an inadequate baseline, based on short-term measurements. The construction noise analysis contains errors which result in underestimating noise levels. Finally, the IS/ND fails to predict any operational noise on site.

Please feel free to contact me with any questions regarding this information.

Very truly yours,
Ani Toncheva, Senior Consultant, WILSON IHRIG

WILSON IHRIG
ACOUSTICS, NOISE & VIBRATION

ANI TONCHEVA

Senior Consultant

Since joining the firm in 2011, Ani has conducted analyses for transit systems, vibration-sensitive research facilities, public infrastructure, construction, and other environmental noise. She has contributed to literature reviews, including research on current practices of historical preservation. She has extensive experience working on construction projects in New York City and is well-versed in local noise codes.

Education

- B.A., Physics; Bard College, New York

Professional Associations

- *Member*, National Council of Acoustical Consultants (NCAC)
- *Member*, Acoustical Society of America (ASA)
- *Member*, WTS (Women's Transportation Seminar)
- *Board Member,* Transportation Research Forum (TRF), NY Chapter and International Board

Project Experience

National Academies of Sciences, NCHRP 25-25/Task 72, Current Practices to Address Construction Vibration and Potential Effects to Historic Buildings Adjacent to Transportation Projects
This report summarizes the results of the literature search and the survey of transportation agencies and provides a detailed discussion of seven informative case studies. A recommended guideline approach for addressing construction vibration effects on historic buildings has also been provided. Assisted with the literature review and case studies.

National Academies of Sciences, ACRP 07-14, Improving Intelligibility of Airport Terminal Public Address Systems
These guidelines are intended to be used by airport operators and design consultants. The research tasks included a literature review, questionnaire to airport operators, a sample passenger survey, acoustic measurements at six airports, and a presentation of best practices for acoustics, PA system design and specifications. Assisted with data analysis for acoustic measurements as part of this study.

101 Mass Avenue Mixed-Used Air Rights Project, Boston, MA
Responsible for developing a Finite Element model of mixed-use development, built over MBTA commuter railway tracks, and spanning I-90 to analyze predicted building response to ground-borne vibration.

180 Jones Street Affordable Housing and Mixed-Use Development, San Francisco, CA
Prepared a CCR Title 24 Noise Study Report for a new mixed-use building. The project included 70 residential units and on-site community facilities.

206th Street Theater Vibration Study, New York, NY
Analyzed ground vibration measurements at the site of the planned theater located near NYCT rail lines.

1801 Haight Street Mixed-Use Development, San Francisco, CA
Prepared a CCR Title 24 Noise Study Report for a new low-rise mixed-use building.

Analog (ArtX) Hotel, Palo Alto, CA
Prepared preliminary basis of design guidelines for a new five-story boutique hotel in a residential area. Work included evaluating exterior noise from a project that may affect guest areas and interior noise and vibration isolation measures.

Centene Corporation Theater, Clayton, MO
Conducted vibration measurements on the site to define and identify frequency and levels of vibration. The purpose of the study was to assess possible intrusion from trains and other sources into the proposed auditorium.

David Geffen Hall Renovation, Lincoln Center, New York, NY
Conducted vibration measurements on multiple levels of the existing David Geffen Hall structure to measure ground-borne vibration from subway trains. Performed background noise measurements inside the hall to determine ground-borne noise from subway trains.

Esther's Orbit Room, Oakland, CA
Prepared a CCR Title 24 Noise Study Report for the renovation of low-rise buildings near elevated train track. The project included a restaurant with live music, an artist gallery space, a wellness center, and two residential units.

First Congregational Church of Berkeley Pilgrim Hall Replacement, Berkeley, CA
Responsible for developing a 3D computer model of a new hall to prepare a basis of design guidelines for room acoustics and noise control and assist in developing acoustic specifications for various disciplines.

Gansevoort Cooperative, New York, NY
Conducted measurements inside several units in a mixed-use building to characterize commercial noise levels and recommend mitigation measures.

Hollis Life Science, Emeryville, CA
Conducted a drawing review regarding the new air handler units, exhaust fans, and related noise, and vibration-generating equipment, to recommend base isolation requirements to control vibration within the building, and to assess noise control requirements.

Sunnydale Block 3A & 3B Mixed-Use Residential Development, San Francisco, CA
Prepared a CCR Title 24 Noise Study Report for two, mixed-use, 5-story buildings. The project was part of the complete rebuild of the existing Sunnydale-Velasco Housing Authority site through the HOPE SF Program.

Pace University Performing Arts, New York, NY
Conducted a vibration feasibility study for the proposed fit-out in an existing mixed-use commercial/residential building to accommodate the university's dance program. The analysis

included vibration measurements of the existing space to characterize the floor response and determine vibration transmission between the dance spaces and residences on the upper floors. Estimated dance-induced vibration and provided recommendations on possible structural modifications to reduce vibration.

The Perelman Performing Arts Center at The World Trade Center, New York, NY
Conducted structure-borne vibration measurements as part of building vibration isolation design for the flexible performance space. Conducted quality control field visits during isolation pad installation.

Carroll Gardens, Citizen's Place, Brooklyn, NY
Conducted a baseline noise and vibration study in the vicinity of planned pilot test program. Observed pile operations and conducted short-term noise and vibration measurements during impact and vibratory pile driving tests.
Columbia University Medical Center Medical and Graduate Education Building, New York, NY
Conducted baseline noise survey and performed attended noise measurements during preliminary construction work. Installed long-term noise monitors and assisted with implementing a sophisticated remote noise monitoring system for a six-month construction phase, including building demolition.

East Side Coastal Resiliency Noise Monitoring Plan, New York, NY
Prepared noise monitoring plan for residences located near planned construction activities involving the use of pile driving methods for the installation of a flood protection system.

Fulton Municipal Manufactured Gas Plant Environment Remediation, New York, NY
Conducted a baseline noise and vibration study in the vicinity of planned Gowanus Canal remediation for the former MGP site, including long-term unattended and short-term noise and vibration measurements.

Former Citizens Gas Works MGP Site Pilot Test Program, New York, NY
Collected long-term baseline noise and vibration data. Conducted short-term attended noise and vibration measurements at during pile operations. Vibration measurements were conducted at nearby residences and at the MTA NYCT structure near the project site.

Gowanus Canal Remediation, New York, NY
Conducted baseline noise measurements and ongoing long-term noise and vibration monitoring in the vicinity of Gowanus Canal Superfund Site 4th Street turning basin dredging and capping pilot study.

Hudson Yards Tower C Foundations and Utilities, New York, NY
Conducted a baseline noise survey prior to construction work, including a combination of long-term unattended and short-term attended noise measurements.

Jewish Community Center of East Bay, Oakland, CA
Oversaw the preparation of a construction noise management plan, which included detailed predictions of noise levels from planned activities and mitigation recommendations. The project consisted of renovation of existing buildings and outdoor facilities.

MacArthur BART Garage and Residences TOD, Oakland, CA
Prepared monitoring reports for ongoing long-term vibration monitoring.

MSK 74th Street, New York, NY
Conducted baseline noise survey, assisted in developing construction noise control and mitigation plan, and implemented a long-term noise monitoring program at two locations. Provided weekly reports of monitoring data with on-going assessments of Contractor compliance with project noise limits and coordinated interior short-term measurements in nearby residential buildings.

NYMTA No. 7 Line Subway Extension, New York, NY
Performed long-term noise monitoring for the ventilation shaft construction site.

NYMTA No. 7 Line Subway Extension Site L Ventilation Facility Construction, New York, NY
The project involved the mining and lining of two shafts and the construction of a 2-story ventilation building at Site L near Dyer Avenue on West 41st Street. Assisted with long-term noise compliance monitoring and preparation of monthly noise monitoring reports.

NYMTA ESA/LIRR Grand Central Terminal Fit-Out, New York, NY
Prepared the Contractor's noise and vibration control plan updates for fit-out work conducted underground at the Grand Central Terminal Suburban Level. Performed field measurements of construction equipment noise and prepared noise emission certificates.

NYMTA Railcar Acceptance and Testing Facility, Brooklyn, NY
Prepared a construction noise control plan, which included predictions of noise levels from planned activities and mitigation recommendations. The project site was below grade and surrounded by residences and a school overlooking the work.

NYMTA Sandy Powers Repairs, New York, NY
Prepared a construction noise control, monitoring, and mitigation plan, which included detailed predictions of noise levels from planned activities and mitigation recommendations. The project included 18 sites and the plan contained site-specific calculations, monitoring locations, and noise control measures for each site.

PANYNJ Lincoln Tunnel Helix Structural Rehabilitation, NJ
Assisted in developing a construction noise control and mitigation plan and implementing a remote long-term noise monitoring program at three locations. Performed noise measurements of nighttime construction activities in the vicinity of sensitive receptors.

PANYNJ World Trade Center Vehicle Security Facility, New York, NY
Conducted baseline noise surveys, assisted in developing construction noise control plans, and implementing a remote long-term noise monitoring program at six locations around the perimeter of the site at noise sensitive receptors. Provided weekly reports of monitoring data with on-going assessments of Contractor compliance with project noise limits.

PANYNJ Midtown Bus Terminal Replacement Program – Dyer Deck-Overs, New York, NY
Prepared a construction noise control and mitigation plan, which included detailed predictions of noise levels from planned activities and mitigation recommendations. The site included eight work

areas, both at grade and on lower level and was surrounded by mid- and high-rise residential buildings overlooking the construction area.

PANYNJ Rehabilitation of Trans-Manhattan Expressway Overpasses, New York, NY
Developed construction noise monitoring criteria for the project based on background levels measured at each work area. The project consisted of the replacement of two bridge structures and the rehabilitation of four additional bridges. The anticipated work was surrounded by mid- and high-rise residential uses.

San Francisco Planning Department, Alameda Street Wet Weather Tunnel and Folsom Area Sewer Improvement, San Francisco, CA
Project Manager in charge of noise and vibration analysis for Folsom Area stormwater infrastructure improvements, as part of the San Francisco Public Utilities Commission's (SFPUC) flood resilience efforts under the Sewer System Improvement Program. Work included baseline noise survey, noise and vibration predictions, evaluation of applicable criteria and recommendations for noise and vibration control measures.

SLAC LCSS Construction Vibration Study, Menlo Park, CA
Generated a site-specific vibration propagation model and analyzed the potential for vibration impacts to ongoing scientific experiments during the construction of a new building on the SLAC campus. Testing included measuring transfer mobilities, determining the vibration response of particle beamline equipment, and vibration generated by construction equipment.

CEQA Peer Reviews, California
Peer review of noise and vibration analyses prepared per CEQA. These projects have primarily focused on the construction and operation of new facilities including residential in-fill, office and mixed-use projects, and educational buildings.

Chevron Oil Refinery, SNR Plant, El Segundo, CA
Development of three-dimensional acoustic model of project site for an environmental noise study to understand prevalence of noise created by the SNR plant located in the oil refinery, determination of regulatory compliance, development of noise criteria for tonal components observed in the adjacent communities and development of noise mitigation options for regulatory compliance and reduction of community annoyance.

Millennium Bulk Terminal, Longview, WA
Prepared noise analysis for the project's NEPA and SEPA environmental impact statements. Tasks included future rail traffic modeling using CadnaA and preparation of noise contours using GIS.

Peninsula Humane Society & SPCA Haskin Hill Sanctuary, Loma Mar, CA
Prepared an environmental study for a planned animal sanctuary in Loma Mar. Work included baseline noise measurements, predictions of expected noise from the completed project and a review of compliance with local regulations and CEQA.

ACTC I-680 Roadway Improvements and HOV Express Lanes, Contra Costa County, CA
Assisted with predictions for traffic noise study. The work included noise modelling and impact assessments consistent with FHWA and Caltrans procedures and methodology for multiple project alternatives.

ACTC I-880/Whipple Interchange, Hayward, CA
Project Manager for a traffic noise study. The work included noise modelling and impact assessments consistent with FHWA and Caltrans procedures and methodology for multiple project alternatives.

I-80/Ashby Avenue (SR-13) Interchange Improvements, Berkeley, CA
Project Manager for a traffic noise study. The work included noise modelling and impact assessments consistent with FHWA and Caltrans procedures and methodology for multiple project alternatives.

Junipero Serra Traffic Noise Study, South San Francisco, CA
Noise analysis of existing traffic noise and potential benefits of noise abatement measures such as sound walls and quieter pavement.

Riverstone Apartments, Seattle, WA
This street will serve the future Star Lake Station currently under construction for Sound Transit's Federal Way Link Extension. As part of the Federal Way project, improvements to the street include the addition of a turning lane and traffic light (currently in place) at the end of a roadway. The study provided an independent assessment of the potential for traffic noise impacts on the residents of Riverstone based on FTA project noise criterion.

50 Pine Street Condominiums, New York, NY
The project involved evaluating noise at residential dwelling units for NYC noise code compliance. Measured noise levels from mechanical equipment in an enclosed courtyard.

Uptown Newport, Newport Beach, CA
Evaluation of noise levels due to mechanical equipment at adjacent property. Assisted heavily with data analysis from long-term monitoring and data presentation for the legal team.

BART Berryessa Station Transit Noise Impact and Mitigation, San Jose, CA
Assisted with noise predictions and barrier design recommendations. Project is a 10.2-mile extension of a heavy rail transit system in the San Francisco Bay Area, and this is one of the stations along the new route.

California High-Speed Rail Fresno-Merced Corridor, Fresno-Merced, CA
Lead noise analyst for the project's environmental impact assessment. Tasks included characterizing the existing noise conditions and assessing noise impacts from transit operations and construction-related activities.

Caltrain Peninsula Corridor Electrification, San Francisco Peninsula, CA
Analyzed previous noise study. Assisted in developing current noise prediction model and GIS model for vibration. Helped prepare FEIR. This project included extensive ambient noise and vibration measurement surveys; the development of noise and vibration prediction models for HST operations; prediction of wayside noise and vibration levels for HST operations; evaluation of

environmental noise and vibration impacts using FRA procedures and criteria and determining the need for any type of noise mitigation.

LA Metro Purple (D) Line Subway Extension - Section 3, Los Angeles, CA
Responsible for developing detailed 3D computer models for two transit stations using EASE software.

Maryland Transit Administration (MTA) Purple Line LRT Final Design, Bethesda to New Carrollton, MD
Responsible for developing detailed 3D computer models for three transit stations using EASE software. Developed 3D models of TPSS sites to evaluate noise from mechanical equipment.

MBTA Green Line Extension Design/Build (GLX), Boston, MA
Lead analyst on noise predictions and barrier design. Work included planning field measurements, conducting data analysis, predicting noise impacts from project operations, and making barrier design recommendations.

Metrolinx Eglinton Crosstown LRT, Toronto, Ontario
Reviewed historic reports for relevant data, assisted with GIS model and preparation for noise and vibration measurements. The TTC is planning to construct the Eglinton Tunnel subway line and needed to address what mitigation could be necessary to reduce ground-borne noise and vibration impacts. The proposed study would determine the most likely range of ground-borne noise and vibration levels in residences and other sensitive buildings along the planned alignment.

Niagara Frontier Transportation Authority (NFTA) LRRT-LRV Midlife Rebuild, Buffalo, NY
Participated in vehicle noise qualification testing program for refurbished light rail transit vehicles.

RTD Eagle P3 Northwest Corridor Noise and Impacts, Denver, CO
Assisted with data analysis and helped prepare the final technical report. The project consists of 33 miles of EMU Commuter Rail connecting downtown Denver Union Station to the Denver International Airport. This project also includes a Commuter Rail Maintenance Facility with a capacity to store and service 100 EMU.

Santa Clara VTA, Vasona LRT Corridor Tire-Derived Aggregate (TDA) Underlayment Performance Testing, San Jose, CA
Project Manager in charge of planning a series of tests to document the performance of TDA ballast underlayment over time, as required by FTA. Previous tests were done in 2006, 2006, and 2009. Work will include documenting vibration isolation performance, rail strain, and rail deflection.

Sound Transit Northgate Link Vibration Attenuation Estimates, Seattle, WA
Provided general field support for all elements of testing. Tasks included moving equipment into/out of the tunnel, deploying sensors on campus, and attending to wireless antennas during testing. To derive the relationship between vibration measured in the Northgate link tunnel and building vibration at research facilities on the University of Washington campus, field tests were conducted using a shaker in the tunnel while simultaneously measuring the vibration response in UW buildings using a wireless data collection system.

TJPA San Francisco Downtown Rail Extension (The Portal), San Francisco, CA
Project Manager in charge of preliminary engineering noise and vibration analysis. The project consists of a 2.4-mile at-grade and tunnel alignment starting at the existing Caltrain terminal station and railyard and ending at the Salesforce Transit Center. Provided updated noise and vibration predictions for the project based on current design and abasement measure design recommendations based on new field testing and updated analysis. Provided an additional study and report of vibration impacts on a sensitive structure along the alignment and possible mitigation strategies.

Toronto Transit Commission (TTC) Scarborough Subway Extension, Toronto, ONT, Canada
Conducted force density level (FDL) measurements and analysis for the Toronto Rocket vehicles on TTC standard double ties on the Toronto-York Spadina Subway Extension. Predicted ground-borne noise and vibration levels at sensitive receptors along the Scarborough extension and prepared project memos.

VTA's BART Silicon Valley Extension Phase II (BSVII) (2020+)
Responsibilities included station acoustics and speech intelligibility design and evaluation of operational train noise and vibration. The largest single public infrastructure project ever constructed in Santa Clara County, this phase of VTA's BART to Silicon Valley project will extend BART service six miles from the Berryessa Transit Center into San Jose and ending in the City of Santa Clara.

WMATA On-Call Task: Green Line Noise and Vibration, Washington, DC
Conducted extensive field measurements inside homes and along tunnels to document ground-borne noise and vibration due to WMATA Green Line trains. Performed rail roughness measurements along sections of track within the study area. Analyzed recordings to determine train passby levels and plotted data to compare results for the different vehicle fleets and compare to applicable criteria.

Washington Metropolitan Area Transit Authority (WMATA) Vehicles Out-of-Round Wheel Study, DC
Assisted with modal analysis on nine wheelsets of WMATA vehicles.

EXHIBIT C

860 Hampshire Road, Suite P
Westlake Village, CA 91361

Date: June 23, 2025

To: Norali Martinez
200 N. Spring Street, Room 721
Los Angeles, CA 90012

From: Christ Kirikian
Partner | Director of Air Quality & Acoustics

Subject: Response to Comments on the Negative Declaration (ND) for KPAC Coil Avenue Freezer Expansion Project (Case No. ENV-2022-6860-ND, SCH No. 2025041295) from Adams Broadwell Joseph & Cardozo letter dated June 12, 2025

This memorandum addresses the comments from Adams Broadwell Joseph & Cardozo dated June 12, 2025 on the Negative Declaration (ND) for the KPAC Coil Avenue Freezer Expansion Project.

1.1 Response 1

This introductory comment summarizes the Project Description and outlines the issues raised by the commenter in their letter. Specific issues raised by the commenter are addressed in detail in Response to Comment Nos. 2 through 16, below. As demonstrated therein, the Draft ND meets the requirements of CEQA and preparation of an Environmental Impact Report (EIR) is not required.

1.2 Response 2

This comment consisting of the commenter's statement of interest is noted for the record and will be made available to the decision-makers for their review and consideration.

1.3 Response 3

The commenter raises the "fair argument" standard under CEQA to assert that the City was legally required to prepare an Environmental Impact Report (EIR) for the proposed project. While it is true that CEQA requires the preparation of an EIR when substantial evidence supports a fair argument that a project may have a significant effect on the environment, the commenter mischaracterizes both the legal threshold and the evidentiary record in this case.

The fair argument standard does indeed establish a relatively low bar for environmental review; however, this threshold is not satisfied by speculative claims, generalized concerns, or unsupported opinions. As defined under CEQA Guidelines §15384, "substantial evidence" must consist of facts, reasonable assumptions predicated upon facts, or expert opinion supported by facts. In this instance, the City conducted a comprehensive Initial Study that evaluated the project's potential effects on air quality, noise, and public health using standard methodologies accepted by regulatory agencies, including emission modeling through

CalEEMod and noise analysis conforming to FTA protocols. The conclusions drawn from this analysis indicate that the project does not exceed any thresholds of significance, and where minor impacts were identified, they were either temporary in nature or sufficiently addressed through regulatory compliance measures.

Finally, the suggestion that the use of a ND is categorically inappropriate due to "potential" unmitigated impacts misconstrues the purpose of the Initial Study process. CEQA requires that a lead agency prepare an EIR only when there is credible, factual support for the claim that impacts may be significant. The Initial Study in this case does not merely speculate that impacts are insignificant; it provides the analytical and evidentiary foundation demonstrating that conclusion. Accordingly, as discussed in Responses #4 through #16 below, the Project would not result in significant air quality, noise and public health impacts.

1.4 RESPONSE 4

The assertion that the ND fails to adequately describe baseline noise conditions misrepresents both the methodological consistency and regulatory sufficiency of the Initial Study's analysis. CEQA does not mandate continuous or multi-day noise monitoring, nor does it require characterization of every potential fluctuation in ambient conditions. Rather, the statute requires that environmental analyses be based on substantial evidence and reasonable assumptions supported by data.

The baseline noise data relied upon in the ND were developed through site-specific monitoring at six locations adjacent to sensitive receptors, including residences west of the project site. These surveys were conducted during weekday morning hours under typical conditions, capturing noise levels associated with local vehicular traffic and rail activity—both identified as primary contributors to ambient noise in the project area. Fifteen-minute measurement intervals conform to widely accepted industry practices (e.g., Caltrans Technical Noise Supplement, FTA Noise and Vibration Manual), and are routinely upheld in CEQA documents as a reasonable approach to characterizing ambient noise. The suggestion that these data are "unsupported" or "unrepresentative" ignores this regulatory context and fails to provide any alternative analysis or threshold demonstrating otherwise.

Regarding the claim that the measurements represent "only 2% of allowable weekday construction hours," this is a misleading metric. Noise standards and impact determinations under CEQA are not based on cumulative hourly representations but on comparisons between modeled project noise levels and established thresholds (typically Leq and Lmax metrics) over defined time periods. The Initial Study applied this framework by comparing anticipated project-related increases to City-adopted noise standards and significance thresholds, thereby ensuring an appropriate, regulation-compliant evaluation.

With respect to Saturday operations, CEQA requires that the lead agency assess reasonably foreseeable conditions. However, the suggestion that weekend noise "may" differ does not constitute substantial evidence of a significant effect. Weekend activity levels in the vicinity are expected to be lower than weekdays, particularly in terms of commuter rail and traffic noise, making weekday measurements a conservative indicator of potential impact. Absent evidence of intensified weekend operations or materially distinct baseline conditions, the City was not obligated to expand its monitoring scope to include Saturday data.

1.5 RESPONSE 5

The appellant incorrectly makes the assumption the ND should have included a quantified construction Health Risk Assessment (HRA), and is thus allegedly inconsistent with CEQA's requirement to make a "reasonable effort to substantively connect a project's air quality impacts to likely health consequences."

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. Although SCAQMD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate air quality issues associated with new development projects within the Air Basin, such as the Project. Instead, SCAQMD published the CEQA *Air Quality Handbook* in November 1993 to assist lead agencies, as well as consultants, project proponents, and other interested parties, in evaluating potential air quality impacts of projects proposed in the Air Basin. The CEQA *Air Quality Handbook* provides standards, methodologies, and procedures for conducting air quality analyses and was used extensively in the preparation of the air quality analysis for this report.

The SCAQMD CEQA Handbook does not recommend analysis of toxic air contaminants (TACs) from short-term construction activities. The rational for not requiring a health risk assessment for construction activities is the limited duration of exposure. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. Specifically, "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given that the greatest potential for diesel particulate emissions would only occur during demolition (approximately 1 month) and excavation/grading activities (approximately 2 months) and other construction activities (approximately 12 months) during the overall construction schedule would result in reduced use of heavy-duty diesel construction equipment in comparison to demolition and excavation/grading activities, the Project would not result in a long-term (i.e., 70 year) source of TAC emissions. No residual TAC emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period (15 out of 840 months of a 70-year lifetime), further evaluation of construction TAC emissions is not warranted. As such, the analysis correctly concluded that Project-related TAC impacts during construction were less than significant.

Additionally, the commenter's claim that the ND improperly relies on Localized Significance Thresholds (LSTs) to assess health impacts from exposure to DPM reflects a misunderstanding of both the regulatory framework and the purpose of LSTs as defined by the SCAQMD. LSTs are expressly intended to serve as conservative screening tools to evaluate localized impacts from criteria pollutants—including particulate matter (PM_{10} and $PM_{2.5}$)—emitted during construction activities. While it is correct that LSTs are not designed to directly assess TACs or conduct HRAs, the assertion that the use of LSTs is "flawed" misconstrues their accepted function.

SCAQMD has consistently advised that a site-specific construction HRA is not required unless modeled emissions—particularly of diesel PM—exceed the applicable LST. In this case, the project's estimated

construction emissions, as modeled in CalEEMod and analyzed in the ND, are well below LST screening thresholds for PM_{10} and $PM_{2.5}$ at the nearest sensitive receptors. This provides a strong presumption under CEQA that the project's localized health impacts, including those associated with short-term exposure to DPM, are less than significant.

The LST methodology is intentionally designed to err on the side of caution by incorporating conservative assumptions regarding proximity, meteorology, and receptor sensitivity. If LSTs are not exceeded, SCAQMD guidance explicitly does not recommend further analysis, such as an HRA, for short-term construction activities. Requiring an HRA in every instance where diesel equipment is used would exceed both regulatory expectations and CEQA's own standard for substantial evidence.

1.6 RESPONSE 6

The commenter's argument that the ND fails to analyze cumulative air quality impacts misstates the applicable CEQA framework and overextends the interpretive scope of current SCAQMD guidance. The ND fully complies with CEQA's two-pronged test for evaluating cumulative impacts: (1) determining whether the cumulative condition itself is significant, and (2) assessing whether the project's contribution is cumulatively considerable in that context.

CEQA Guidelines §15064(h)(3) explicitly allow a lead agency to use established regulatory thresholds as a proxy for cumulative significance, provided those thresholds are developed to account for cumulative conditions. The SCAQMD mass emission thresholds for criteria pollutants are specifically designed to evaluate whether a project's contribution to regional air quality degradation would be cumulatively considerable. The project's modeled emissions fall well below these thresholds for all pollutants of concern, including NO_x, ROG, CO, PM_{10}, and $PM_{2.5}$. Therefore, per CEQA Guidelines, the conclusion that cumulative impacts are less than significant is legally defensible and supported by substantial evidence.

The commenter asserts that this approach is insufficient because SCAQMD is "currently updating" its guidance for cumulative analysis of TACs, specifically DPM. However, draft concepts presented in working groups do not constitute adopted regulatory thresholds or enforceable policy. Until such time as SCAQMD formally adopts a cumulative TAC significance framework through a public process, lead agencies are not required under CEQA to apply tentative methodologies still under development. Nonetheless, the ND proactively addressed TAC impacts through conservative screening with LSTs for PM emissions, which serve as a recognized proxy for short-term DPM exposure. These emissions were shown to be well below LSTs at the nearest sensitive receptors.

Furthermore, the commenter references the MATES V dataset and background cancer risks without providing any project-specific risk assessment or evidence that the project would elevate cumulative cancer risk in a meaningful way. CEQA requires a fact-based demonstration of significance, not generalized concerns or emerging research discussions. The ND's conclusion that a HRA was not warranted is consistent with SCAQMD's own guidance, which indicates that an HRA is not required unless screening thresholds (i.e., LSTs) are exceeded—a condition not met here.

Regarding the claim that the ND improperly dismisses foreseeable projects as speculative, this too is incorrect. The Initial Study considered the built environment and regional growth patterns but did not identify any specific, active, or approved projects in the immediate vicinity that would combine with the proposed project to result in a cumulatively considerable impact. CEQA does not require speculation about unknown or indefinite future development. Rather, it mandates a good faith effort to use reasonably available information. The ND's cumulative analysis meets that standard.

In sum, the commenter provides no substantial evidence that the project would incrementally contribute to a significant cumulative air quality condition. The City's reliance on adopted regulatory thresholds and accepted screening methodologies is consistent with CEQA and current SCAQMD practice. An EIR is not required simply because alternative thresholds or emerging guidance could theoretically yield different conclusions. CEQA requires a reasoned, evidence-based approach—which the City has applied here.

1.7 RESPONSE 7

The claim that substantial evidence supports a fair argument the project may result in a significant cancer risk due to DPM emissions is not supported by regulatory standards or established CEQA practice. While the commenter cites Dr. Clark's independent modeling to suggest that the project's construction activities would cause a cancer risk exceeding 1 in one million, this analysis is not a legally binding standard under CEQA nor does it represent adopted methodology from the SCAQMD.

The SCAQMD has not formally adopted the draft cumulative cancer risk significance framework referenced by the commenter. While the Multiple Air Toxics Exposure Study V (MATES V) provides valuable background information on regional TAC exposure levels, it is not intended to serve as a project-level threshold or regulatory trigger under CEQA. The cited 1 in one million benchmark reflects a conceptual screening threshold discussed in SCAQMD working groups—it is not codified or recommended as a universal standard. Agencies are not required to rely on non-final guidance, particularly in the absence of an adopted methodology.

The ND properly utilized SCAQMD's LSTs for $PM_{2.5}$ and PM_{10}, which are conservative screening tools that account for localized emissions, receptor proximity, and short-term exposure risks. Project emissions were found to be well below those thresholds, indicating that the potential for localized DPM-related impacts, including cancer risk, is less than significant. SCAQMD explicitly does not recommend preparation of a HRA unless LSTs are exceeded—a condition that does not apply here.

Moreover, Dr. Clark's modeling assumes the applicability of the draft cumulative impact methodology and imposes thresholds that are neither required by CEQA nor endorsed by SCAQMD. Even if one were to accept the modeling at face value, the resulting cancer risk of 2.27 in one million still falls below SCAQMD's currently adopted significance threshold of 10 in one million. CEQA does not require an EIR simply because an alternative analysis generates a more conservative result, especially when that result remains below existing regulatory thresholds.

Finally, the commenter's claim that the project's location in a disadvantaged or AB 617-designated community mandates use of a stricter threshold lacks a basis in CEQA or in adopted air district regulations. While CEQA recognizes environmental justice considerations, it does not require the substitution of emerging or unadopted standards in place of established criteria. The City's conclusions are grounded in adopted thresholds, agency guidance, and accepted modeling practices. The existence of alternate analyses or lower thresholds, even if derived from valid models, does not equate to substantial evidence that a significant impact may occur.

Additionally, as described in both Response #5 and #6, if LSTs are not exceeded, SCAQMD guidance explicitly does not recommend further analysis, such as an HRA, for short-term construction activities. No residual TAC emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period (15 out of 840 months of a 70-year lifetime), further evaluation of construction TAC emissions is not warranted. As such, the analysis correctly concluded that Project-related TAC impacts during construction were less than significant.

In short, the administrative record supports the conclusion that construction-related DPM emissions would not result in a significant health risk. The City is not required to prepare an EIR based on speculative or non-standard risk thresholds, particularly where no adopted methodology mandates such action. The commenter's reliance on draft guidance and unofficial risk thresholds does not constitute substantial evidence under CEQA.

1.8 Response 8

First, the commenter's claim that the air quality analysis is deficient due to the omission of emissions from transport refrigeration units (TRUs) fails to consider the operational data already disclosed in the ND, as well as the scale of the projected increase. The ND acknowledges that the existing site accommodates approximately 110 to 120 truck TRUs per day and that, under the proposed project, TRU activity would increase by only 30 to 40 trucks per day—a modest increment in the context of the overall operational volume.

There will be no increase in refrigerated railcar TRU activity, and all additional truck TRUs are already subject to regulatory controls under the California Air Resources Board's (CARB) TRU Airborne Toxic Control Measure (ATCM). These regulations cap the emissions profile of in-use and new TRUs through required engine upgrades, operational time limits, and idling restrictions. As such, even at the conservative end of the activity range, the net increase in TRU activity is regulated and not expected to materially increase the project's localized DPM emissions.

To ensure that this assumption was empirically tested, the project's emissions profile was supplemented with PCE units at a ratio of 1.5 passenger cars to input into CalEEMod. Therefore, it was assumed the proposed expansion would result in 732 daily trips. The ND's finding of less-than-significant air quality impacts remains valid, and there is no substantial evidence to suggest that the marginal increase in TRU-related emissions would result in significant localized cancer risks or contribute materially to cumulative impacts. The project is located in an industrial corridor where similar mobile and stationary emission sources are common, and it has

incorporated operational best practices and mitigation measures that further minimize emissions exposure at nearby sensitive receptors.

Secondly, the comment asserts that the air quality analysis in the ND is deficient because it does not explicitly quantify emissions from cargo handling equipment such as yard trucks, forklifts, or top picks—equipment commonly associated with cold storage logistics. However, this claim overstates the potential contribution of these sources and does not undermine the ND's conclusions.

To address the comment and ensure the most conservative evaluation possible under CEQA, a supplemental emissions analysis was conducted that incorporates cargo handling equipment using standard emission factors for diesel and propane-powered yard equipment commonly found at similar facilities. This analysis includes operational assumptions reflective of routine facility use, including multiple pieces of equipment operating daily.

The results of the supplemental modeling (refer to **Attachment A**) confirm that emissions from cargo handling equipment—when added to the original CalEEMod output—do not meaningfully increase total operational emissions. Specifically, even with the inclusion of these sources, the project's total emissions for all criteria pollutants, including nitrogen oxides (NOx), volatile organic compounds (VOCs), and DPM remain well below SCAQMD regional and localized significance thresholds.

This additional analysis reaffirms that the original conclusion of "less than significant impact" remains valid. The fact that neither the baseline nor project conditions triggered any thresholds for significance—even after conservatively including this equipment—demonstrates that the commenter's concern does not rise to the level of substantial evidence under CEQA. The omission of such minor sources from the initial model does not constitute a "significant analytical gap," particularly given that the revised modeling confirms no change in the impact determination.

Thirdly, the commenter's claim that the omission of emissions from the facility's stationary fire pump undermines the integrity of the air quality modeling is unsubstantiated and ultimately irrelevant to the CEQA conclusions. While it is correct that the original model did not explicitly include emissions from the fire pump, this does not constitute a material deficiency because, as the commenter themselves acknowledges, fire pumps are tested only intermittently—typically for short durations on a monthly or annual basis. Their limited runtime inherently limits their emissions output, making it unlikely that they would substantially affect the overall emissions profile of the project.

Nevertheless, to address the comment and further validate the robustness of the environmental analysis, a supplemental modeling exercise was conducted to incorporate emissions from the fire pump under conservative operational assumptions. Specifically, the revised analysis assumes the fire pump would operate for one hour per day and up to 100 hours per year—substantially more frequent than industry practice and well beyond typical testing schedules. This modeling approach ensures that any potential emissions are overestimated rather than minimized, in keeping with CEQA's requirement for conservative impact assessment.

As shown in **Attachment A** of the supplemental analysis, the addition of the fire pump results in negligible changes to the overall emissions inventory. Criteria pollutant levels, including for DPM and nitrogen oxides (NOx)—the pollutants of concern identified by the commenter—remain almost identical to the original results disclosed in the ND. Importantly, total emissions for all regulated pollutants, including DPM and NOx, remain below the applicable SCAQMD significance thresholds. These findings confirm that the fire pump does not contribute materially to the project's potential to cause significant air quality impacts.

Therefore, the inclusion of the fire pump in the supplemental analysis further substantiates the ND's conclusion that air quality impacts are less than significant. The commenter's assertion does not constitute substantial evidence under CEQA, nor does it demonstrate a basis for requiring preparation of an Environmental Impact Report.

1.9 RESPONSE 9

The commenter's assertion that the noise analysis supporting the ND is analytically flawed due to "unsupported assumptions" about equipment distances reflects a fundamental misunderstanding of both the modeling methodology employed and the regulatory expectations under CEQA. Contrary to the comment's claim, the analysis did not rely on speculative or undocumented distances; rather, it utilized industry-standard software and conservative modeling protocols to ensure the assessment was both representative and precautionary.

The noise modeling was conducted using SoundPLAN, a three-dimensional acoustic modeling tool that incorporates not only source data—such as the sound power levels for construction equipment provided by the Federal Highway Administration's Roadway Construction Noise Model (FHWA RCNM)—but also terrain, elevation, and receptor-specific inputs. The use of SoundPLAN inherently accounts for the actual geometric relationship between noise sources and sensitive receptors by integrating scaled topographical data. Thus, the distances between construction activities and nearby residential receptors were not arbitrarily assumed; they were algorithmically computed within the modeling environment based on accurate spatial mapping utilizing Google Earth.

Moreover, the analysis adopted conservative assumptions throughout. It presumes the simultaneous operation of multiple high-noise construction equipment types, a condition that rarely occurs in real-world scenarios due to logistical constraints and typical construction phasing. This "worst-case" assumption ensures that predicted noise levels represent the upper bound of potential exposure and thus err on the side of caution when evaluating significance.

The suggestion that empirical validation of input distances is missing is misplaced. SoundPLAN, by design, references georeferenced base maps and user-defined project layouts to simulate propagation paths. The model's outputs reflect not generic assumptions, but spatially accurate projections based on mapped receptor locations.

CEQA requires that noise assessments be based on reasonable assumptions and supported by substantial evidence. The City's use of a 3D modeling platform like SoundPLAN, coupled with conservative construction scenarios and FHWA-sourced equipment data, meets and exceeds this standard. The analysis discloses assumptions and modeling parameters. Thus, the claim that the ND fails to substantiate noise model inputs or fails to accurately depict receptor distances is unfounded. The analysis is conservative and fully CEQA-compliant.

1.10 Response 10

The commenter's critique of the City's use of an 80 dBA Leq threshold for assessing construction noise mischaracterizes the purpose and application of this threshold, and disregards the City of Los Angeles's most recent regulatory guidance. While it is true that noise thresholds must be tailored to local context and receptor sensitivity, the City's analysis is both consistent with CEQA and directly aligned with the City's current adopted methodology for assessing construction noise impacts.

In September 2024, the Department of City Planning issued an advisory memorandum that formalized updated thresholds and methodologies for analyzing construction noise and vibration. These updates, which evolved from the December 2023 policy proposal process, specifically establish thresholds that balance the realities of urban construction with the need to protect public health and sensitive receptors. For construction noise, the advisory identifies context-sensitive, receptor-specific thresholds that reflect both absolute noise levels and potential for sleep disturbance. The City's ND applies the adopted 80 dBA Leq daytime threshold for residential receptors—a threshold that the Department affirmed in its 2024 memorandum as an appropriate criterion for temporary, non-pile-driving activities during standard construction hours.

Furthermore, the ND's noise analysis is conservative and methodologically robust. It uses FHWA-sourced maximum noise levels, assumes simultaneous operation of all major construction equipment types, and models receptor-specific impacts using three-dimensional terrain-based propagation via SoundPLAN. This ensures that the modeled noise environment does not underestimate potential impacts. The fact that these worst-case scenarios remain below the City's adopted 80 dBA significance threshold provides substantial evidence supporting the conclusion that construction noise will not result in significant effects.

In sum, the City's noise analysis is fully consistent with CEQA and the September 2024 City-adopted thresholds and methodologies. The argument that the use of an absolute threshold is inappropriate lacks merit and fails to recognize the discretion CEQA affords lead agencies in setting and applying locally tailored significance criteria. The ND's findings are both technically and legally sound.

1.11 Response 11

The comment contends that construction noise impacts are significant and unmitigated based on an independent calculation provided by Ms. Toncheva, which aims to show that the demolition phase would generate an 8-hour Leq of 82 dBA at nearby residential receptors. However, this analysis is incomplete and

omits critical context and project-specific design features, thereby limiting its reliability and evidentiary value under CEQA.

First, the assertion that the ND fails to apply the City's recommended methodology is inaccurate. As described in Response #10, the noise analysis adheres to the September 2024 Department of City Planning advisory memorandum, which formally establishes the 80 dBA Leq daytime threshold for evaluating significance of construction noise impacts within the City of Los Angeles. This threshold reflects cumulative policy considerations, balancing construction feasibility with community protection, and is specifically intended for short-term, daytime construction activities such as those proposed for this project.

Second, the commenter's analysis fails to incorporate existing site conditions and Environmental Protection Measures (EPMs) that are integral to the project's design and implementation. As documented in the ND's noise study, EPMs NV1-1 through NV1-6 include multiple controls: properly maintained and muffled equipment (NV1-1), orientation and staging of noisy equipment away from sensitive uses (NV1-2), installation of temporary noise barriers or acoustic blankets (NV1-3, NV1-6), restriction of particularly noisy tasks to daytime hours (NV1-5), and clear site access routing to minimize disturbance (NV1-4). These measures are not speculative—they are regulatory compliance measures and enforceable components of project implementation and materially reduce the predicted noise levels at offsite receptors.

In addition, the modeling in the ND accounts for the attenuation provided by physical distance and onsite structures. Ms. Toncheva's calculation uses a simplified propagation estimate without factoring in the noise shielding benefits of intervening buildings. The modeled noise levels, inclusive of worst-case assumptions, remain below the City's adopted 80 dBA threshold for construction activities.

1.12 Response 12

The commenter's claim that the ND fails to demonstrate compliance with applicable construction noise standards under Los Angeles Municipal Code (LAMC) §112.05 is factually and legally unfounded. As detailed in Response #10, the City has explicitly incorporated the most current, context-sensitive construction noise thresholds as set forth in its September 2024 Department of City Planning advisory memorandum. That guidance refines the City's application of CEQA thresholds of significance for construction noise and vibration and was developed precisely to address inconsistencies between regulatory noise limits and the realities of temporary construction activity in urban environments.

The CEQA analysis in the ND appropriately utilizes the 80 dBA Leq threshold identified in the City's 2024 adopted CEQA guidance as the relevant threshold for determining the potential for significant impacts on sensitive receptors. This threshold was not selected arbitrarily; it reflects Citywide policy deliberations that weighed community health, urban density, and environmental justice considerations, and was established to ensure consistency across all CEQA noise analyses conducted within the City of Los Angeles.

The suggestion that the ND does not acknowledge or analyze local construction noise regulations is also incorrect. The analysis incorporates construction equipment noise profiles based on FHWA data and models

noise levels using SoundPLAN under conservative assumptions—including simultaneous equipment operation at the nearest property line to residential uses. The modeled levels were then compared against the adopted CEQA threshold.

Furthermore, the legal premise that compliance with regulatory standards must be independently demonstrated to function as mitigation under CEQA is inapplicable here. CEQA does not require mitigation for impacts that are found to be less than significant in the first instance. In this case, the project is expected to comply with applicable municipal construction standards through standard conditions of approval, contract specifications, and active construction oversight by the City's Department of Building and Safety. The ND does not rely on regulatory compliance as a substitute for mitigation but is instead concluding—based on modeling and adopted thresholds—that the impacts are not significant.

In conclusion, the ND's approach is fully aligned with both the City's 2024 CEQA thresholds and with CEQA's requirements for a good faith, evidence-based impact determination. The suggestion that a failure to disclose or address LAMC §112.05 renders the ND deficient is inaccurate. The project's construction noise levels, even under conservative assumptions, are consistent with City-adopted CEQA thresholds and are expected to operate within the performance envelope established by applicable local regulations.

1.13 Response 13

The ND acknowledges that all mechanical equipment is required to comply with the City's Municipal Code Section 112.02, which prohibits noise from such equipment from causing an increase in ambient noise level of more than 5 dBA. Compliance with these regulatory standards ensures that noise levels generated by mechanical equipment do not exceed acceptable thresholds.

The LADBS reviews building permit applications to ensure that all proposed mechanical equipment complies with applicable noise regulations. As part of this review, project applicants are required to demonstrate that mechanical equipment is designed and installed in a manner that meets the City's Municipal Code. If necessary, additional noise attenuation measures, such as shielding, equipment selection, or placement adjustments, may be incorporated into project design to achieve compliance.

Since the Project is required to comply with the City's Municipal Code and will be subject to review during the plan check process, additional analysis in the ND is not required. The conclusion that impacts would be less than significant is based on enforceable regulatory standards, and compliance will be verified as part of the City's plan check process.

1.14 Response 14

Under existing conditions, approximately 120 truck/container trips occur per day, with modeled noise levels ranging from 57.1 dBA for medium-duty trucks to 62.4 dBA for heavy-duty trucks at 25 feet from the nearest sensitive receptor. The proposed project would add 40 truck/container trips per day, resulting in a total of 160. This increase corresponds to a projected noise level of 58.4 to 63.6 dBA at the same receptor distance,

depending on truck class. This maximum incremental increase of 1.3 dBA is well below the commonly used CEQA significance threshold of 5 dBA for operational noise. According to the ambient noise measurements provided in the ND, existing baseline noise levels already exceed 60 dBA due to industrial activity and transportation infrastructure in the area. Therefore, the additional truck activity would not cause a perceptible or significant change in the acoustic environment.

For purposes of this response, a supplemental analysis was conducted to simulate dock operations in their proposed location, adjacent to Drumm Avenue and behind the existing barrier wall, which was explicitly included in the model as a shielding feature. The supplemental SoundPLAN modeling specifically evaluated dock operations using a reference Sound Power Level (LwA) of 114.2 dB, which corresponds to the unloading of trailers via forklift—one of the loudest reasonably anticipated operational scenarios.

The results of the supplemental analysis show that noise levels at the nearest sensitive receptors are as follows: 60.9 dBA at Site 1, 60.1 dBA at Site 2, 56.3 dBA at Site 3, 54.4 dBA at Site 4, 48.9 dBA at Site 5, and 41.5 dBA at Site 6 (refer to **Attachment B**). None of these modeled noise levels represent an increase of 5 dBA or more above existing ambient conditions, the standard CEQA threshold for a potentially significant increase. Even at the closest receptor (Site 1), the modeled dock-related noise increase is below this level, demonstrating that the proposed dock relocation and extended operations into Saturday will not result in perceptible or significant increases in noise exposure.

In conclusion, the original and supplemental analyses demonstrate, using site-specific modeling and conservative assumptions, that noise from truck and dock operations will not result in a significant increase over ambient conditions. The ND's conclusion of a less than significant impact is supported by substantial evidence and complies fully with CEQA.

1.15 RESPONSE 15

The commenter's assertion that the City cannot lawfully approve the requested entitlements due to alleged "significant, unmitigated public health and environmental impacts" mischaracterizes both the scope of the proposed project and the thoroughness of the environmental review conducted under CEQA. As established in detailed responses to comments throughout this administrative record, the ND is supported by substantial evidence and appropriately concludes that the project will not result in significant environmental impacts.

With respect to air quality, the ND applies SCAQMD thresholds for both regional and localized impacts and models emissions using CalEEMod under conservative assumptions. Construction emissions fall well below applicable LSTs, which SCAQMD recognizes as the primary screening tool for evaluating short-term DPM exposure. Contrary to assertions in the comment, a HRA is not warranted per adopted SCAQMD guidance, and the application of emerging, non-final cumulative risk frameworks is not required under CEQA. The project's contribution to cumulative air quality impacts is likewise less than considerable, as explained in prior responses.

For noise, the ND uses SoundPLAN modeling with conservative input assumptions and incorporates both weekday ambient measurements and enforceable Environmental Protection Measures (EPMs) NV1-1 through NV1-6. As addressed in earlier responses, operational noise from truck traffic and loading dock activities, including during Saturday operations, would not exceed a 5 dBA increase above ambient at any sensitive receptor. Construction noise, modeled assuming simultaneous use of all major equipment types, remains below the City's adopted 80 dBA Leq threshold as formalized in the September 2024 Department of City Planning advisory memorandum. Supplemental analysis further confirmed that noise from dock operations does not exceed ambient levels in a manner that would result in a significant impact.

The ND also provides a reasoned, evidence-based assessment of all other CEQA-required resource areas and finds no potentially significant effects that remain unmitigated. Assertions of public health or welfare harm are not substantiated by expert opinion that meets CEQA's substantial evidence standard. Where alternative modeling was presented by commenters, those submissions either failed to account for design-level mitigation, applied unadopted or draft thresholds, or made assumptions inconsistent with the project description.

Regarding General Plan and Community Plan consistency, the commenter's claim of inconsistency with policies such as Air Quality Element Policy 1.3.1 or Noise Element Policies 2.2 ignores the fact that these policies are implemented through the environmental standards and thresholds applied in the ND. Since the ND demonstrates that the project complies with those standards and would not result in significant impacts, the project does not conflict with those policies. Moreover, 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 and supporting community compatibility.

Finally, the entitlement findings required for the General Plan Amendment, Zone Change, Zoning Administrator Determination, Site Plan Review, and Waiver of Dedication and Improvements are not precluded by the ND's findings. There is no evidence that the project would degrade adjacent properties, pose a risk to public safety, or be inconsistent with the scale, character, or goals of the Wilmington – Harbor City Community Plan. To the contrary, the project facilitates improved logistics operations in a zone historically defined by industrial and goods movement uses, while incorporating environmental controls that mitigate potential externalities.

In conclusion, the ND demonstrates that the project's potential environmental impacts are less than significant. The City retains full discretion to make the required findings in support of the proposed entitlements based on substantial evidence in the record, consistent with CEQA, the General Plan, and all applicable policies.

1.16 RESPONSE 16

This comment concludes the letter. Refer to Response to Comment Nos. 1 through 14, above for issues raised by the commenter.

ATTACHMENT A

Supplemental CalEEMod Output Files

KPAC (Operational) Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	KPAC (Operational)
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.30
Precipitation (days)	16.0
Location	1420 Coil Ave, Wilmington, CA 90744, USA
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4611
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Refrigerated Warehouse-Rail	282	1000sqft	6.47	281,999	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	12.5	11.3	22.3	39.9	0.14	0.66	5.65	6.31	0.62	1.47	2.09	268	25,349	25,617	28.7	1.84	7,545	34,428
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	10.3	9.31	22.8	26.2	0.13	0.64	5.65	6.29	0.61	1.47	2.07	268	25,130	25,398	28.7	1.85	7,516	34,183
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	10.9	10.0	18.3	29.9	0.11	0.50	4.80	5.30	0.48	1.25	1.72	268	23,002	23,270	28.6	1.64	7,526	32,000
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.99	1.83	3.34	5.46	0.02	0.09	0.88	0.97	0.09	0.23	0.31	44.3	3,808	3,853	4.73	0.27	1,246	5,298
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	55.0	55.0	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Threshold	—	55.0	55.0	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.04	1.36	12.3	18.6	0.11	0.14	5.65	5.79	0.13	1.47	1.60	—	12,163	12,163	0.66	1.43	29.2	12,634
Area	8.93	8.76	0.10	12.3	< 0.005	0.02	—	0.02	0.02	—	0.02	—	50.4	50.4	< 0.005	< 0.005	—	50.6
Energy	0.18	0.09	1.59	1.34	0.01	0.12	—	0.12	0.12	—	0.12	—	10,862	10,862	0.80	0.09	—	10,909
Water	—	—	—	—	—	—	—	—	—	—	—	125	840	965	12.9	0.31	—	1,380
Waste	—	—	—	—	—	—	—	—	—	—	—	143	0.00	143	14.3	0.00	—	500
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	7,515	7,515
Off-Road	0.95	0.80	7.35	6.86	0.01	0.33	—	0.33	0.31	—	0.31	—	1,267	1,267	0.05	0.01	—	1,271
Stationary	0.36	0.33	0.92	0.84	< 0.005	0.05	0.00	0.05	0.05	0.00	0.05	0.00	168	168	0.01	< 0.005	0.00	168
Total	12.5	11.3	22.3	39.9	0.14	0.66	5.65	6.31	0.62	1.47	2.09	268	25,349	25,617	28.7	1.84	7,545	34,428
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.02	1.34	12.9	17.2	0.11	0.14	5.65	5.79	0.13	1.47	1.60	—	11,994	11,994	0.67	1.44	0.76	12,439
Area	6.75	6.75	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.18	0.09	1.59	1.34	0.01	0.12	—	0.12	0.12	—	0.12	—	10,862	10,862	0.80	0.09	—	10,909
Water	—	—	—	—	—	—	—	—	—	—	—	125	840	965	12.9	0.31	—	1,380
Waste	—	—	—	—	—	—	—	—	—	—	—	143	0.00	143	14.3	0.00	—	500
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	7,515	7,515

Off-Road	0.95	0.80	7.35	6.86	0.01	0.33	—	0.33	0.31	—	0.31	—	1,267	1,267	0.05	0.01	—	1,271
Stationary	0.36	0.33	0.92	0.84	< 0.005	0.05	0.00	0.05	0.05	0.00	0.05	0.00	168	168	0.01	< 0.005	0.00	168
Total	10.3	9.31	22.8	26.2	0.13	0.64	5.65	6.29	0.61	1.47	2.07	268	25,130	25,398	28.7	1.85	7,516	34,183
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.73	1.15	11.1	15.1	0.10	0.12	4.80	4.92	0.11	1.25	1.36	—	10,318	10,318	0.57	1.23	10.8	10,710
Area	8.25	8.13	0.07	8.40	< 0.005	0.01	—	0.01	0.01	—	0.01	—	34.5	34.5	< 0.005	< 0.005	—	34.7
Energy	0.18	0.09	1.59	1.34	0.01	0.12	—	0.12	0.12	—	0.12	—	10,862	10,862	0.80	0.09	—	10,909
Water	—	—	—	—	—	—	—	—	—	—	—	125	840	965	12.9	0.31	—	1,380
Waste	—	—	—	—	—	—	—	—	—	—	—	143	0.00	143	14.3	0.00	—	500
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	7,515	7,515
Off-Road	0.68	0.57	5.24	4.89	0.01	0.24	—	0.24	0.22	—	0.22	—	902	902	0.04	0.01	—	905
Stationary	0.10	0.09	0.25	0.23	< 0.005	0.01	0.00	0.01	0.01	0.00	0.01	0.00	46.0	46.0	< 0.005	< 0.005	0.00	46.2
Total	10.9	10.0	18.3	29.9	0.11	0.50	4.80	5.30	0.48	1.25	1.72	268	23,002	23,270	28.6	1.64	7,526	32,000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.32	0.21	2.03	2.75	0.02	0.02	0.88	0.90	0.02	0.23	0.25	—	1,708	1,708	0.09	0.20	1.79	1,773
Area	1.50	1.48	0.01	1.53	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.72	5.72	< 0.005	< 0.005	—	5.74
Energy	0.03	0.02	0.29	0.24	< 0.005	0.02	—	0.02	0.02	—	0.02	—	1,798	1,798	0.13	0.02	—	1,806
Water	—	—	—	—	—	—	—	—	—	—	—	20.7	139	160	2.13	0.05	—	228
Waste	—	—	—	—	—	—	—	—	—	—	—	23.7	0.00	23.7	2.36	0.00	—	82.8
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,244	1,244
Off-Road	0.12	0.10	0.96	0.89	< 0.005	0.04	—	0.04	0.04	—	0.04	—	149	149	0.01	< 0.005	—	150
Stationary	0.02	0.02	0.05	0.04	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	7.62	7.62	< 0.005	< 0.005	0.00	7.64
Total	1.99	1.83	3.34	5.46	0.02	0.09	0.88	0.97	0.09	0.23	0.31	44.3	3,808	3,853	4.73	0.27	1,246	5,298

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-Rail	2.04	1.36	12.3	18.6	0.11	0.14	5.65	5.79	0.13	1.47	1.60	—	12,163	12,163	0.66	1.43	29.2	12,634
Total	2.04	1.36	12.3	18.6	0.11	0.14	5.65	5.79	0.13	1.47	1.60	—	12,163	12,163	0.66	1.43	29.2	12,634
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-Rail	2.02	1.34	12.9	17.2	0.11	0.14	5.65	5.79	0.13	1.47	1.60	—	11,994	11,994	0.67	1.44	0.76	12,439
Total	2.02	1.34	12.9	17.2	0.11	0.14	5.65	5.79	0.13	1.47	1.60	—	11,994	11,994	0.67	1.44	0.76	12,439
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-Rail	0.32	0.21	2.03	2.75	0.02	0.02	0.88	0.90	0.02	0.23	0.25	—	1,708	1,708	0.09	0.20	1.79	1,773
Total	0.32	0.21	2.03	2.75	0.02	0.02	0.88	0.90	0.02	0.23	0.25	—	1,708	1,708	0.09	0.20	1.79	1,773

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	—	8,959	8,959	0.63	0.09	—	9,002
Total	—	—	—	—	—	—	—	—	—	—	—	—	8,959	8,959	0.63	0.09	—	9,002
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	—	8,959	8,959	0.63	0.09	—	9,002
Total	—	—	—	—	—	—	—	—	—	—	—	—	8,959	8,959	0.63	0.09	—	9,002
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	—	1,483	1,483	0.11	0.01	—	1,490
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,483	1,483	0.11	0.01	—	1,490

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refriger Warehouse-Rail	0.18	0.09	1.59	1.34	0.01	0.12	—	0.12	0.12	—	0.12	—	1,902	1,902	0.17	< 0.005	—	1,908
Total	0.18	0.09	1.59	1.34	0.01	0.12	—	0.12	0.12	—	0.12	—	1,902	1,902	0.17	< 0.005	—	1,908
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-Rail	0.18	0.09	1.59	1.34	0.01	0.12	—	0.12	0.12	—	0.12	—	1,902	1,902	0.17	< 0.005	—	1,908
Total	0.18	0.09	1.59	1.34	0.01	0.12	—	0.12	0.12	—	0.12	—	1,902	1,902	0.17	< 0.005	—	1,908
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-Rail	0.03	0.02	0.29	0.24	< 0.005	0.02	—	0.02	0.02	—	0.02	—	315	315	0.03	< 0.005	—	316
Total	0.03	0.02	0.29	0.24	< 0.005	0.02	—	0.02	0.02	—	0.02	—	315	315	0.03	< 0.005	—	316

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	6.03	6.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.72	0.72	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landscape	2.18	2.01	0.10	12.3	< 0.005	0.02	—	0.02	0.02	—	0.02	—	50.4	50.4	< 0.005	< 0.005	—	50.6
Total	8.93	8.76	0.10	12.3	< 0.005	0.02	—	0.02	0.02	—	0.02	—	50.4	50.4	< 0.005	< 0.005	—	50.6
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	6.03	6.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.72	0.72	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	6.75	6.75	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	1.10	1.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.13	0.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.27	0.25	0.01	1.53	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.72	5.72	< 0.005	< 0.005	—	5.74
Total	1.50	1.48	0.01	1.53	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.72	5.72	< 0.005	< 0.005	—	5.74

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	125	840	965	12.9	0.31	—	1,380
Total	—	—	—	—	—	—	—	—	—	—	—	125	840	965	12.9	0.31	—	1,380
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	125	840	965	12.9	0.31	—	1,380
Total	—	—	—	—	—	—	—	—	—	—	—	125	840	965	12.9	0.31	—	1,380
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	20.7	139	160	2.13	0.05	—	228
Total	—	—	—	—	—	—	—	—	—	—	—	20.7	139	160	2.13	0.05	—	228

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refrigerated	—	—	—	—	—	—	—	—	—	—	—	143	0.00	143	14.3	0.00	—	500
Total	—	—	—	—	—	—	—	—	—	—	—	143	0.00	143	14.3	0.00	—	500
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	143	0.00	143	14.3	0.00	—	500
Total	—	—	—	—	—	—	—	—	—	—	—	143	0.00	143	14.3	0.00	—	500
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	23.7	0.00	23.7	2.36	0.00	—	82.8
Total	—	—	—	—	—	—	—	—	—	—	—	23.7	0.00	23.7	2.36	0.00	—	82.8

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	7,515	7,515
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	7,515	7,515
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Refriger Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	7,515	7,515
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	7,515	7,515
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Refrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,244	1,244
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,244	1,244

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Forklifts	0.08	0.07	0.68	1.04	< 0.005	0.03	—	0.03	0.03	—	0.03	—	152	152	0.01	< 0.005	—	153
Rubber Tired Dozers	0.82	0.69	6.26	5.29	0.01	0.28	—	0.28	0.25	—	0.25	—	1,034	1,034	0.04	0.01	—	1,038
Other Construction Equipment	0.05	0.04	0.42	0.53	< 0.005	0.02	—	0.02	0.02	—	0.02	—	80.1	80.1	< 0.005	< 0.005	—	80.4
Total	0.95	0.80	7.35	6.86	0.01	0.33	—	0.33	0.31	—	0.31	—	1,267	1,267	0.05	0.01	—	1,271
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Forklifts	0.08	0.07	0.68	1.04	< 0.005	0.03	—	0.03	0.03	—	0.03	—	152	152	0.01	< 0.005	—	153

Rubber Tired Dozers	0.82	0.69	6.26	5.29	0.01	0.28	—	0.28	0.25	—	0.25	—	1,034	1,034	0.04	0.01	—	1,038
Other Construction Equipment	0.05	0.04	0.42	0.53	< 0.005	0.02	—	0.02	0.02	—	0.02	—	80.1	80.1	< 0.005	< 0.005	—	80.4
Total	0.95	0.80	7.35	6.86	0.01	0.33	—	0.33	0.31	—	0.31	—	1,267	1,267	0.05	0.01	—	1,271
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Forklifts	0.01	0.01	0.09	0.13	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	18.0	18.0	< 0.005	< 0.005	—	18.0
Rubber Tired Dozers	0.11	0.09	0.81	0.69	< 0.005	0.04	—	0.04	0.03	—	0.03	—	122	122	< 0.005	< 0.005	—	122
Other Construction Equipment	0.01	0.01	0.05	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9.45	9.45	< 0.005	< 0.005	—	9.48
Total	0.12	0.10	0.96	0.89	< 0.005	0.04	—	0.04	0.04	—	0.04	—	149	149	0.01	< 0.005	—	150

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Fire Pump	0.36	0.33	0.92	0.84	< 0.005	0.05	0.00	0.05	0.05	0.00	0.05	0.00	168	168	0.01	< 0.005	0.00	168
Total	0.36	0.33	0.92	0.84	< 0.005	0.05	0.00	0.05	0.05	0.00	0.05	0.00	168	168	0.01	< 0.005	0.00	168
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Fire Pump	0.36	0.33	0.92	0.84	< 0.005	0.05	0.00	0.05	0.05	0.00	0.05	0.00	168	168	0.01	< 0.005	0.00	168
Total	0.36	0.33	0.92	0.84	< 0.005	0.05	0.00	0.05	0.05	0.00	0.05	0.00	168	168	0.01	< 0.005	0.00	168
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Fire Pump	0.02	0.02	0.05	0.04	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	7.62	7.62	< 0.005	< 0.005	0.00	7.64
Total	0.02	0.02	0.05	0.04	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	7.62	7.62	< 0.005	< 0.005	0.00	7.64

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Refrigerated Warehouse-Rail	733	733	0.00	229,386	7,275	7,275	0.00	2,276,180

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	422,999	141,000	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Refrigerated Warehouse-Rail	4,736,467	690	0.0489	0.0069	5,936,212

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Refrigerated Warehouse-Rail	65,212,269	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Refrigerated Warehouse-Rail	265	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Refrigerated Warehouse-Rail	Cold storage	R-404A	3,922	7.50	7.50	7.50	25.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Forklifts	Diesel	Average	1.00	8.00	82.0	0.20
Rubber Tired Dozers	Diesel	Average	1.00	6.00	367	0.40

Other Construction Equipment	Diesel	Average	1.00	2.00	82.0	0.42

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
Fire Pump	Diesel	1.00	1.00	100	200	0.73

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	6.24	annual days of extreme heat
Extreme Precipitation	4.10	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A

Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	20.8
AQ-PM	67.5
AQ-DPM	83.5
Drinking Water	42.4
Lead Risk Housing	94.8
Pesticides	21.1
Toxic Releases	99.3
Traffic	66.0
Effect Indicators	—
CleanUp Sites	59.4
Groundwater	56.3
Haz Waste Facilities/Generators	97.3
Impaired Water Bodies	0.00
Solid Waste	90.1
Sensitive Population	—
Asthma	83.0
Cardio-vascular	92.8
Low Birth Weights	62.1
Socioeconomic Factor Indicators	—
Education	96.2
Housing	93.9
Linguistic	59.8
Poverty	78.3
Unemployment	79.7

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	17.65687155
Employed	57.44899269
Median HI	28.24329526
Education	—
Bachelor's or higher	4.157577313
High school enrollment	100
Preschool enrollment	37.79032465
Transportation	—
Auto Access	37.4566919
Active commuting	59.00166816
Social	—
2-parent households	11.81829847
Voting	28.74374439
Neighborhood	—
Alcohol availability	21.57064032
Park access	26.22866675
Retail density	56.79455922
Supermarket access	7.76337739
Tree canopy	26.97292442
Housing	—
Homeownership	38.90671115
Housing habitability	11.48466573
Low-inc homeowner severe housing cost burden	33.64557937
Low-inc renter severe housing cost burden	26.31849095

Uncrowded housing	2.977030669
Health Outcomes	—
Insured adults	11.54882587
Arthritis	68.4
Asthma ER Admissions	21.3
High Blood Pressure	69.1
Cancer (excluding skin)	89.7
Asthma	23.6
Coronary Heart Disease	37.1
Chronic Obstructive Pulmonary Disease	40.0
Diagnosed Diabetes	13.1
Life Expectancy at Birth	11.0
Cognitively Disabled	50.3
Physically Disabled	45.1
Heart Attack ER Admissions	21.1
Mental Health Not Good	13.3
Chronic Kidney Disease	14.8
Obesity	12.4
Pedestrian Injuries	67.4
Physical Health Not Good	12.4
Stroke	34.3
Health Risk Behaviors	—
Binge Drinking	54.2
Current Smoker	20.8
No Leisure Time for Physical Activity	15.9
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0

Children	17.1
Elderly	76.6
English Speaking	16.2
Foreign-born	79.0
Outdoor Workers	28.5
Climate Change Adaptive Capacity	—
Impervious Surface Cover	10.6
Traffic Density	54.5
Traffic Access	87.4
Other Indices	—
Hardship	93.8
Other Decision Support	—
2016 Voting	5.7

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	97.0
Healthy Places Index Score for Project Location (b)	20.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	Wilmington Long Beach Carson

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Operations: Vehicle Data	According to the Transportation Study Assessment Referral Form, based on 679 daily trips for the proposed land use
Operations: Fleet Mix	Employee trips account for approximately 34 percent of total daily trips. Truck trips account of approximately 66 percent and divided evenly between medium and heavy duty trucks for a conservative assessment
Operations: Off-Road Equipment	Conservatively assuming the use of a fork lift, dozer and other equipment during operation.

ATTACHMENT A

Supplemental SoundPLAN Output Sheets - Loading Dock

KPAC Cold Storage Expansion
Contribution spectra - Loading Dock

Time slice	Source	Sum dB(A)	63Hz dB(A)	125Hz dB(A)	250Hz dB(A)	500Hz dB(A)	1kHz dB(A)	2kHz dB(A)	4kHz dB(A)	8kHz dB(A)	
Receiver Site 1 Fl G Leq-1hour dB(A) Leq-1hour 60.9 dB(A)											
Leq-1hour	Dock Operation	35.2	26.4	25.6	26.1	28.4	29.1	27.0	17.4	-10.7	
Leq-1hour	Dock Operation	60.9	39.0	42.4	43.8	47.2	54.8	58.0	52.6	35.3	
Receiver Site 2 Fl G Leq-1hour dB(A) Leq-1hour 55.9 dB(A)											
Leq-1hour	Dock Operation	33.5	24.3	23.3	24.2	26.4	28.3	25.5	12.6	-24.3	
Leq-1hour	Dock Operation	55.8	37.7	40.5	42.5	46.1	51.2	51.6	44.8	26.1	
Receiver Site 2 Fl F2 Leq-1hour dB(A) Leq-1hour 60.1 dB(A)											
Leq-1hour	Dock Operation	34.2	24.0	24.0	25.0	27.1	29.2	26.7	12.9	-24.2	
Leq-1hour	Dock Operation	60.1	39.3	42.2	44.3	46.7	54.7	56.9	51.5	36.1	
Receiver Site 3 Fl G Leq-1hour dB(A) Leq-1hour 56.3 dB(A)											
Leq-1hour	Dock Operation	32.1	22.5	21.6	22.5	25.8	27.1	23.8	7.6	-39.8	
Leq-1hour	Dock Operation	56.3	38.4	41.2	43.0	46.7	51.7	52.1	45.0	26.4	
Receiver Site 4 Fl G Leq-1hour dB(A) Leq-1hour 54.4 dB(A)											
Leq-1hour	Dock Operation	27.2	18.8	17.2	17.9	21.1	21.5	18.0	1.1	-54.6	
Leq-1hour	Dock Operation	54.4	36.1	38.6	40.7	44.1	48.8	51.0	44.1	24.6	
Receiver Site 5 Fl G Leq-1hour dB(A) Leq-1hour 41.0 dB(A)											
Leq-1hour	Dock Operation	29.3	20.7	19.4	19.9	22.2	22.9	22.4	11.8	-23.5	
Leq-1hour	Dock Operation	40.7	25.7	25.9	27.2	29.7	35.2	37.6	27.9	1.5	
Receiver Site 5 Fl F2 Leq-1hour dB(A) Leq-1hour 48.9 dB(A)											
Leq-1hour	Dock Operation	33.4	24.4	24.1	24.7	26.9	27.6	24.8	12.3	-23.5	
Leq-1hour	Dock Operation	48.7	31.0	33.1	35.2	36.3	43.8	45.4	36.8	9.4	
Receiver Site 6 Fl G Leq-1hour dB(A) Leq-1hour 38.1 dB(A)											
Leq-1hour	Dock Operation	28.1	20.2	18.9	19.5	21.7	21.8	18.4	1.9	-50.6	
Leq-1hour	Dock Operation	37.7	25.4	25.3	25.5	27.9	33.4	32.7	21.4	-12.5	
Receiver Site 6 Fl F2 Leq-1hour dB(A) Leq-1hour 41.5 dB(A)											
Leq-1hour	Dock Operation	28.6	20.0	19.3	20.1	22.3	22.5	19.2	1.9	-50.7	
Leq-1hour	Dock Operation	41.3	27.1	28.4	29.6	31.1	36.8	37.0	25.3	-9.9	

EXHIBIT D

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August 4, 2025

VIA Email and Overnight Mail

President Monique Lawshe
c/o Cecilia Lamas
Commission Executive Assistant
City Planning Commission
City of Los Angeles
200 North Spring Street
Los Angeles, California 90012
cpc@lacity.org
cecilia.lamas@lacity.org

Via Email Only

Norali Martinez
City Planner
norali.martinez@lacity.org

Re: **City Planning Commission 8/14/25 Hearing for 1420 Coil Avenue Freezer Expansion Project (CPC-2022-6859-GPA-HD-ZAD-WDI, ENV-2022-6860-ND)**

Dear President Lawshe, Commissioners, Ms. Lamas, and Ms. Martinez:

We write on behalf of the Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA") regarding the 1420 Coil Avenue Freezer Expansion Project (Case No. CPC-2022-6589-GPA-HD-ZAD-WDI, ENV-2022-6860-ND) ("Project") proposed by Konoike Pacific California, Inc. ("Applicant"), to be considered by the City of Los Angeles ("City") City Planning Commission ("CPC") on August 14, 2025.

CREED LA's review of the City's Responses to Comments ("RTCs") on the Project's proposed Negative Declaration ("ND") demonstrate that the City has not complied with California Environmental Quality Act ("CEQA") or local land use laws. CREED LA urges the CPC to continue the public hearing on the Project and remand this matter to Staff with direction to prepare an environmental impact report ("EIR") that fully discloses, analyzes, and mitigates, the Project's significant noise, hazards, and public health impacts, as required by CEQA, before considering the Project's proposed entitlements.

I. INTRODUCTION

On August 14, 2025, the CPC is scheduled to consider adoption of the ND and approval of the Project's entitlements, including a proposed general plan amendment and change of height district to accommodate a 65 foot building height, a zoning administrator determination to permit a transitional height of 65 feet for the portion of the remodeled building beyond 100 feet from the residential area to the west of the Project site, and a waiver of dedication and improvement requirements for Drum and Coil Avenues.[1] Any action to adopt the ND or approve the entitlements is premature and unsupported by substantial evidence in the record, as the City has failed to comply with the requirements of CEQA and the record lacks substantial evidence to support approval findings.

Under CEQA, an EIR must be prepared whenever substantial evidence in the record supports a fair argument that a project may have significant environmental impacts that are not fully mitigated.[2] This "fair argument" standard imposes a low threshold for requiring an EIR.[3] Even where the lead agency asserts that a project will not result in significant environmental impacts, CEQA mandates that "if there is disagreement among expert opinion supported by facts over the significance of an effect on the environment, the Lead Agency shall treat the effect as significant and shall prepare an EIR."[4]

On June 12, 2025, CREED LA submitted comments on the Draft ND during the extended public comment period.[5] CREED LA's comments were supported by expert technical reports documenting potentially significant impacts to air quality, noise, and public health from the Project's construction and operational phases which the ND failed to disclose or mitigate. In response, the City's consultant prepared the RTCs, which assert that the ND complies with CEQA and that no EIR

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[1] City of Los Angeles, Initial Study: KPAC Coil Avenue Freezer Expansion Project (Apr. 2025) (hereinafter "ND"), *available at* https://planning.lacity.gov/odocument/e1530a49-43ec-49de-9db4-95396a173b68/ENV-2022-6860.pdf.
[2] CEQA Guidelines § 15064(f)(1).
[3] *Consolidated Irrig. Dist. v. City of Selma* (2012) 204 Cal.App.4th 187, 207; *Nelson v. County of Kern* (2010) 190 Cal.App.4th 252; *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928; *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572, 580; *Citizen Action to Serve All Students v. Thornley* (1990) 2222 Cal.App.3d 748, 754; *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 310.
[4] CEQA Guidelines § 15064(g) (emphasis added).
[5] Letter to Norali Martinzez City of Los Angeles from Andrew J. Graf, Adams Broadwell Joseph & Cardozo re: Comments on Negative Declaration for KPAC Coil Avenue Freezer Expansion Project (Case No. ENV-2022-6860-ND, SCH No. 2025041295) (June 12, 2025) (hereinafter "CREED LA ND Comments").

is required.[6] However, as demonstrated below – and further supported by the attached comments of noise expert Ani Toncheva[7] – the RTCs fail to cure the ND's fundamental analytical deficiencies. The record contains substantial evidence from qualified experts supporting a fair argument that the Project may result in significant environmental impacts, including but not limited to noise, air quality, and public health effects. Under CEQA, the existence of such evidence triggers the City's obligation to prepare an EIR.

Accordingly, CREED LA respectfully urges the CPC to continue the public hearing, and direct Staff to prepare a legally adequate EIR. The EIR must fully disclose, analyze, and mitigate the Project's potentially significant environmental impacts in accordance with CEQA's procedural and substantive requirements.

II. SUBSTANTIAL EVIDENCE SUPPORTS A FAIR ARGUMENT THAT THE PROJECT MAY RESULT IN SIGNIFICANT, UNMITIGATED NOISE IMPACTS

A. The RTCs Do Not Cure Errors in the City's Baseline Ambient Noise Measurements

CREED LA commented that the ND lacks substantial evidence to support its baseline ambient noise measurements because the methodology used to establish baseline conditions is flawed.[8] The RTCs assert that the baseline data is adequate on the grounds that the 15-minute measurement intervals captured "typical" noise levels and conformed to widely accepted industry practices.[9] This is incorrect.

CEQA requires that the environmental setting be described with sufficient detail to place the project's impacts "in the full environmental context."[10] The required scope and level of detail in the baseline description depends on the nature

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[6] Letter to Norali Martinez, City of Los Angeles from Christian Kirkian, Meridian Consultants re: Response to Comments on the Negative Declaration (ND) for KPAC Coil Avenue Freezer Expansion Project (Case No. ENV-2022-6860-ND, SCH No. 2025041295) from Adams Broadwell Joseph & Cardozo letter dated June 12, 2025 (June 23, 2025) (hereinafter "RTCs").

[7] **Exhibit A**, Letter to Andrew J. Graf, Adams Broadwell Joseph & Cardozo from Ani Toncheva, Wilson Ihrig re: KPAC Coil Avenue Freezer Expansion Project, Wilmington, CA, Review and Comment on Response to Comments (Aug. 1, 2025) (hereinafter "Toncheva Supplemental Comments").

[8] CREED LA ND Comments at pp. 5-7.

[9] RTCs at pp. 2-3.

[10] CEQA Guidelines § 15125(c).

and extent of the project's environmental impacts.[11] Here, as explained by noise expert Ms. Toncheva, the use of single-day, 15-minute sampling interval is not consistent with industry standards or with the regulatory guidance on which the RTCs rely, and is insufficient to capture the full extent of construction-related noise impacts, which occur over full-day periods.[12] As a result, the ND relies on unsupported baseline measurements and fails to provide a meaningful basis for evaluating noise impacts in context.

First, the RTCs wrongly contend that the short-term measurements reflect standard industry practice.[13] In fact, as explained by Ms. Toncheva, both the Federal Transit Administration's Transit Noise and Vibration Impact Assessment Manual ("FTA Manual") and the California Department of Transportation's Technical Noise Supplement to the Traffic Noise Analysis Protocol ("CalTrans TeNS") recommend 24-hour monitoring to determine ambient noise levels in residential areas.[14] The FTA Manual explicitly states that full 24-hour measurements are appropriate for establishing residential baseline conditions,[15] while CalTrans TeNS emphasizes that monitoring should be conducted during the noisiest expected time or include sufficient duration to adjust short-term data to represent peak conditions.[16] The ND's methodology fails to meet either standard.

Second, the RTCs mischaracterize the significance of weekend baseline levels, claiming that lower weekend ambient noise levels suggest a reduced impact.[17] In fact, Ms. Toncheva concludes that lower background levels increase the perceptibility and severity of project-related noise, thereby exacerbating its disruptive effects.[18] This fundamental principle of acoustic analysis is well recognized in the field, and the RTCs failure to account for it reflects a flawed and unsupported interpretation of noise impact significance.

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[11] *League to Save Lake Tahoe Mtn. Area Preservation Found. v. County of Placer* (2022) 75 Cal.App.5th 63, 92.
[12] Toncheva Supplemental Comments at p. 1.
[13] *Ibid.*
[14] *Ibid.*
[15] *Ibid*; see also Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual (Sept. 2018) p. 225, *available at* https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.
[16] Toncheva Supplemental Comments at p. 1; see also California Department of Transportation, Technical Noise Supplemental to the Traffic Noise Analysis Protocol (Sept. 2013) pp. 3-10 to 3-11, *available at* https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf.
[17] Toncheva Supplemental Comments at pp. 1-2.
[18] *Id.* at p. 2.

Additionally, the RTCs fail to address nighttime noise levels, which are essential to evaluating the impact of additional equipment expected to operate as part of the facility expansion.[19] CEQA mandates that agencies evaluate the incremental effects of a proposed project.[20] The omission of nighttime data precludes meaningful analysis of operational impacts, particularly where the additional equipment is expected to operate 24 hours a day.

Finally, the RTCs make several assertions regarding CEQA's baseline requirements without citing any statute, regulation, guidelines, or case law.[21] As demonstrated above, the RTCs misstate the applicable legal standards governing the description of the environmental setting. In the absence of supporting legal authority, the RTCs' assertions remain conclusory and unsubstantiated. Accordingly, the RTCs fail to demonstrate that the ND provides a legally adequate baseline for evaluating the project's environmental impacts.

B. Construction Noise Impacts Remain Significant and Unmitigated

CREED LA submitted an expert analysis demonstrating that construction noise impacts would exceed the ND's absolute threshold of 80 dBA, resulting in a significant impact which requires mitigation.[22] In response, the RTCs assert that the expert analysis is flawed because it allegedly fails to account for existing site conditions and Environmental Protection Measures ("EPM").[23] This assertion is incorrect.

The EPM cited – such as the use of mufflers, equipment orientation and staging, noise barriers, restricting construction hours, and clear site access routing – are either already reflected in the modeling inputs or irrelevant to the noise calculation.[24] Mufflers, for example, are standard features on modern construction equipment and are already assumed in the reference noise levels relied upon by both the ND and Ms. Toncheva.[25] Construction hours and access routing do not affect the instantaneous noise levels generated by equipment operations and thus

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[19] *Ibid.*
[20] *El Dorado County Taxpayers for Quality Growth v. County of El Dorado* (2004) 122 Cal.App.4th 1591; *Leonoff v. Monterey County Bd. of Supervisors* (1990) 222 Cal.App.3d 1337; *City of Ukiah v. County of Mendocino* (1987) 196 Cal.App.3d 47.
[21] RTCs at pp. 2-3.
[22] CREED LA ND Comments at pp. 14-16.
[23] RTCs at pp. 9-10.
[24] Toncheva Supplemental Comments at p. 2.
[25] *Ibid.*

have no bearing on the expert's quantitative assessment.[26] Accordingly, the RTCs' critique mischaracterizes the expert's methodology and fails to undermine the conclusion that the Project would generate construction noise in excess of the City's selected threshold.[27] Ms. Toncheva's comments, which were based on site-specific facts in the record and the City's recommended methodology for determining construction noise impacts, provide substantial evidence supporting a fair argument that the Project's construction noise impacts are significant and require analysis and mitigation in an EIR.

Moreover, even if the City disputes Ms. Toncheva's conclusions, they are based on substantial evidence. The City's dispute over the significance of construction noise impacts therefore reflects a disagreement among experts as to whether the Project will result in significant environmental effects. CEQA is explicit in its directive that when such a disagreement exists, particularly where credible expert evidence indicates a fair argument that impacts may be significant, the agency cannot rely on a ND.[28] Instead, it must prepare an EIR.[29]

CREED LA also commented that the ND's noise modeling contained unsupported assumptions and inconsistencies.[30] The RTCs purport to justify the adequacy of the SoundPLAN noise modeling used to support the conclusions in the Initial Study by offering a general explanation of the model's methodology.[31] However, the RTCs fail to provide the underlying modeling data necessary to independently evaluate that claim.[32]

Without access to the layout, the accuracy and reliability of the modeling results cannot be verified.[33] This is particularly critical because there are discrepancies between the narrative discussion in the text and the data presented in the supporting tables.[34] These inconsistencies cannot be meaningfully assessed without access to the model's layout and operational details.[35] The lack of transparency precludes informed public review and undermines the City's obligation under CEQA to support its conclusion with substantial evidence.

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[26] *Ibid.*
[27] *Ibid.*
[28] CEQA Guidelines § 15064(g).
[29] *Ibid.*
[30] CREED LA ND Comments at pp. 13-14.
[31] RTCs at pp. 8-9.
[32] Toncheva Supplemental Comments at p. 2.
[33] *Ibid.*
[34] *Ibid.*
[35] *Ibid.*

C. The City Lacks Substantial Evidence to Conclude that Operational Noise Impacts Would be Less than Significant

CREED LA submitted comments explaining that the ND fails to adequately analyze whether the Project will comply with regulatory standards governing noise from fixed mechanical equipment, resulting in undisclosed and unmitigated noise impacts.[36] In response, the RTCs assert that the Los Angeles Department of Building Safety's permitting process will ensure that any mechanical equipment ultimately installed will comply with applicable noise standards.[37] However, the City's reliance on prospective permit review or regulation by other agencies – without providing substantial evidence demonstrating that such review will effectively mitigate the identified impact – is legally insufficient to support adoption of the ND.

Under CEQA, potentially significant environmental impacts be fully evaluated and mitigated based on substantial evidence in the administrative record.[38] Speculative reliance on future agency action, in the absence of analysis or enforceable mitigation, does not satisfy this requirement.[39] Here, the ND does not identify the type of equipment to be used onsite, nor does it evaluate their potential impacts on nearby residential receptors.[40] Without such information, the City lacks an evidentiary basis to conclude that impacts will be less than significant.

CREED LA also commented that the ND fails to adequately analyze noise impacts from truck and dock activity.[41] The RTCs provide results from a supplemental SoundPLAN analysis which purport to show a less than significant impact.[42] However, like the ND's construction modeling, the RTCs fail to provide the underlying modeling data necessary to independently evaluate the claim.[43] Therefore, the ND lacks substantial evidence to support the conclusion that operational noise impacts associated with truck and dock activity are less than significant.

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[36] CREED LA ND Comments at pp. 16-17.
[37] RTCs at p. X.
[38] *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 306-07.
[39] *Ibid.*
[40] Toncheva Supplemental Comments at p. 2.
[41] CREED LA ND Comments at p. 17.
[42] RTCs at pp. 11-12.
[43] Toncheva Supplemental Comments at p. 2.

III. SUBSTANTIAL EVIDENCE SUPPORTS A FAIR ARUGMENT THAT THE PROJECT MAY RESULT IN SIGNIFICANT PUBLIC HEALTH IMPACTS

A. The RTCs Continue to Improperly Rely on Localized Significance Thresholds to Conclude Cumulative Cancer Risks Are Less than Significant

CREED LA's comments on the ND explained that the ND's reliance on localized significance thresholds ("LSTs") to conclude that cumulative health impacts from exposure to diesel particulate matter ("DPM") are less than significant was inconsistent with law and unsupported by facts because LSTs do not address toxic air contaminants ("TACs").[44] In response, the RTCs double down on the ND's deficiency, asserting that SCAQMD has consistently advised that a site-specific health risk assessment is not required unless modeled emissions – particularly of diesel PM – exceed the applicable LST.[45] However, as CREED LA previously explained, this claim is entirely unsupported. The RTCs fail to cite any written guidance, policy statement, or regulatory document from SCAQMD to substantiate its assertion.

The RTCs reference SCAQMD's 1993 Air Quality Handbook in an apparent attempt to support their position, suggesting that the agency does not recommend analysis of TACs from short-term construction activities.[46] However, this reliance is misplaced. The handbook does not contain any such statement. In fact, the document is both outdated and silent on the issue of health risk assessments for construction-related DPM emissions. It predates the development of current OEHHA risk assessment methodologies and the substantial body of scientific and regulatory guidance that now recognizes the health significance of short-term, high-intensity DPM exposures, especially in communities already overburdened by elevated ambient DPM levels.

Finally, the RTCs contention that reliance on LSTs is appropriate for assessing cumulative health risk impacts is flawed.[47] While mass emission thresholds for criteria pollutants may be designed to evaluate whether a project's contribution to regional air quality degradation is cumulative considerable, they are not an appropriate tool for analyzing cumulative DPM impacts. LSTs were developed to assess localized air quality impacts – specifically, ambient

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[44] CREED LA ND Comments at pp. 7-9.
[45] RTCs at p. 3-4.
[46] *Id.* at p. 3.
[47] RTCs at p. 4.

concentration levels of criteria pollutants – rather than to evaluate chronic or acute health risks posed by TACs such as DPM.[48] By using LSTs as a proxy for cumulative health risks, the ND conflates two distinct analytical tools and bypasses the accepted health risk assessment methodology established by regulatory authorities.[49]

B. The RTCs Response Regarding Cumulative Cancer Risk Impacts Is Inadequate

CREED LA submitted expert evidence demonstrating that the Project's construction-related DPM emissions would result in cancer risks that are cumulatively considerable, particularly when evaluated considering the already elevated DPM exposure in the surrounding community.[50] Dr. Clark's analysis determined that the Project would generate a cancer risk of 2.27 in one million during construction – more than double the one million threshold referenced in updated guidance currently being developed by SCAQMD.[51] In response, the RTCs dismiss these findings by asserting that the Project's emissions fall below LSTs and SCAQMD's 10 in one million thresholds.[52]

Under CEQA, compliance with a selected threshold of significance does not conclusively establish that an impact is less than significant.[53] Thresholds of significance are not presumptive rules; rather they are tools that may assist in the determination of significance, but they do not relieve a lead agency of its obligation to consider substantial evidence indicating that the impact may be significant despite compliance with the chosen threshold.[54] Accordingly, if evidence is submitted suggesting that an environmental effect may be significant notwithstanding compliance with a threshold, the agency must confront and evaluate that evidence in good faith.[55]

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[48] CREED LA ND Comments at pp. 7-9.
[49] *Ibid.*
[50] *Id.* at p. 11-12.
[51] *Ibid.*
[52] RTCs at p. 5.
[53] CEQA Guidelines § 15064(b)(2).
[54] *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1108; *Communities for a Better Environment v. Cal. Resources Agency* (2022) 103 Cal.App.4th 98, 111-13.
[55] CEQA Guidelines § 15064(b)(2).

Here, the RTCs' reliance on LSTs and SCAQMD's current threshold is misplaced. As discussed in Section III.A., LSTs are designed to assess short-term localized concentrations of criteria pollutants, not cumulative health risks from TACs like DPM. Similarly, the 10 in one million risk level is not a rigid demarcation of significance, particularly when SCAQMD has recognized the need for updated cumulative impact guidance for TACs and substantial evidence demonstrates that the project would contribute to cumulative impacts in an already heavily burdened community.[56] Dr. Clark's expert analysis – grounded in site-specific modeling and SCAQMD's more recent draft guidance – demonstrates that the Project would incrementally but meaningfully exacerbate cancer risks in a community already experiencing disproportionate DPM exposure.[57]

This constitutes substantial evidence supporting a fair argument of a potentially significant cumulative impact. CEQA requires that an EIR be prepared when such evidence exists.[58] The City may not rely on generalized thresholds to sidestep its duty to fully disclose, evaluate, and mitigate the Project's health risk impacts given the surrounding community's existing vulnerability.

IV. CONCLUSION

CREED LA respectfully urges the CPC to continue the public hearing and direct Staff to prepare an EIR that fully discloses, analyzes, and mitigates the Project's noise, air quality, and public health impacts, as required by CEQA.

Thank you for your consideration of these comments.

Sincerely,

Andrew J. Graf

AIG:ljl
Attachments

[56] CREED LA ND Comments at pp. 7-12.
[57] *Id.* at pp. 11-12.
[58] CEQA Guidelines § 15064.

EXHIBIT A

WILSON IHRIG
ACOUSTICS, NOISE & VIBRATION

CALIFORNIA
WASHINGTON
NEW YORK

WI #25-001.19

August 1, 2025

Andrew J. Graf
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

SUBJECT: KPAC Coil Avenue Freezer Expansion Project
Wilmington, CA
Review and Comment on Response to Comments

Dear Mr. Graf,

Wilson Ihrig has reviewed the Response to Comments (RTC) prepared by Meridian Consultants, dated June 2025. The RTC is largely unresponsive and does not address potentially significant operational and construction impacts.

Baseline Noise is Not Properly Established: RTC 1.4

The RTC asserts that the Initial Study survey locations were conducted during "typical conditions associated with local vehicular traffic and rail activity" without providing any substantial evidence. As stated in our previous comments, the 15-minute measurements do not adequately capture fluctuation in noise sources, which can underestimate potential impacts. Only one of the measurements notes the presence of rail activity.

The RTC incorrectly claims that the measurement duration adheres to widely accepted industry practices and cites the Caltrans Technical Noise Supplement (TeNS) and the FTA Noise and Vibration Manual (FTA Manual). The FTA Manual explicitly recommends full 24-hour measurements to determine ambient noise for residential receivers [pg. 225]. The TeNS, which is meant to address traffic noise models, does not require 24-hour measurements, but recommends that "noise monitoring for background community noise levels should be done during the expected time of the highest noise level from the highway," [pg. 3-10] or conducting 24-hour measurements to adjust measured short-term levels to the noisiest hour [pg. 3-11].

The RTC misunderstands our original comments dated May 2025, stating that "noise standards and impact determinations under CEQA are not based on cumulative hourly representations." As discussed above, the ambient measurements do not consider fluctuations in existing levels during the hours of construction or operation. As a result, the ND's impact analysis underestimates potential noise impacts.

The RTC does not directly respond to the question of weekend and nighttime ambient levels. The RTC acknowledges that weekend levels are expected to be lower than weekdays, but incorrectly claims

that weekend measurements are a "conservative indicator of potential impact". This statement reflects a fundamental misunderstanding of acoustic analysis. Lower ambient noise levels would result in a greater increase in noise levels due to project activities, and therefore would not be a conservative indicator. The RTC does not address the issue of nighttime measurements to account for 24-hour cooling needs of the facility. Nighttime ambient levels are needed to assess an increase due to operational noise from mechanical equipment.

Construction Noise Levels Would be Potentially Significant: RTC 1.9 – 1.12

The RTC fails to address the omission of the SoundPLAN model referred to in the Initial Study, an omission that is both material and readily verifiable, as the layout can easily be reproduced. As explained in our previous comments, there are discrepancies between distances presented in the body of the text and supporting tables which cannot be assessed without verifying the layout of the SoundPLAN model.

Further, the RTC claims the example analysis for demolition noise does not consider Environmental Protection Measures (EPMs), which were included in the Initial Study. The measures cited include mufflers, equipment orientation and staging, noise barriers, restricting construction hours, and clear site access routing. Mufflers are standard for modern construction equipment and would already be accounted for in the reference levels used by the Initial Study, the same reference levels used in the example calculation. Construction hours and site access routing are irrelevant to the calculation. Therefore, our prior analysis of construction noise impacts remains valid, and demonstrates a potentially significant impact given noise levels from demolition activities at the nearest residential receptor would be 82 dBA, exceeding ambient noise levels by 11 dBA, the City's Municipal Code, and the 80 dBA absolute threshold.

The Initial Study and RTC provide no evidence that the SoundPLAN model reflects equipment direction or the use of a noise barrier. The tables in Attachment 2 of the initial study indicate that no barrier was included in the model.

Missing Operational Noise Analysis, RTC 1.13-1.14

The RTC is unresponsive and continues to make the circular argument that mechanical equipment on site will meet the City's Municipal Code criteria, because it is a requirement. The Initial Study and RTC fail to identify the type of equipment to be used on site and to assess and disclose potential mechanical noise impacts.

The RTC provides further discussion of noise from truck activity and an attachment provides supplemental SoundPLAN output sheets for dock noise. However, the RTC fails to show the SoundPLAN model, show the distance used, or indicate how much shielding is provided by the existing barrier wall, making it difficult to verify the results. Further, it is unclear if the traffic volumes provided in the RTC are for Saturdays.

Very truly yours,

Ani Toncheva, Senior Consultant, WILSON IHRIG

EXHIBIT E

ADAMS BROADWELL JOSEPH & CARDOZO

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August 11, 2025

VIA Email and Overnight Mail

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Re: **ITEM 6: CREED LA Supplemental Comments on 1420 Coil Avenue Freezer Expansion Project (CPC-2022-6859-GPA-HD-ZAD-WDI, ENV-2022-6860-ND)**

Dear President Lawshe, Commissioners, Ms. Lamas, and Ms. Martinez:

We write on behalf of the Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA") regarding the 1420 Coil Avenue Freezer Expansion Project (Case No. CPC-2022-6589-GPA-HD-ZAD-WDI, ENV-2022-6860-ND) ("Project") proposed by Konoike Pacific California, Inc. ("Applicant"), to be considered by the City of Los Angeles ("City") City Planning Commission ("CPC") on August 14, 2025.

CREED LA submits these supplemental comments to further demonstrate that the CPC Recommendation Report fails to show compliance with California Environmental Quality Act ("CEQA") and applicable local land use laws. As a result, the CPC lacks substantial evidence to support the findings required to approve the Project. CREED LA respectfully urges the CPC to continue the public hearing on the Project and remand this matter to Staff with direction to prepare an environmental impact report ("EIR") that fully discloses, analyzes, and mitigates, the Project's significant noise, hazards, and public health impacts, as required by CEQA, before considering the Project's proposed entitlements.

I. INTRODUCTION

On August 14, 2025, the CPC is scheduled to consider adoption of a Negative Declaration[1] and approval of the Project's entitlements, including a proposed general plan amendment and change of height district to accommodate a 65 foot building height, a zoning administrator determination to permit a transitional height of 65 feet for the portion of the remodeled building beyond 100 feet from the residential area to the west of the Project site, and a waiver of dedication and improvement requirements for Drum and Coil Avenues.[2] Any action to adopt the ND or approve the entitlements is premature and unsupported by substantial evidence in the record, as the City has failed to comply with the requirements of CEQA and the record lacks substantial evidence to support approval findings.

On June 12, 2025, CREED LA submitted comments on the Draft ND during the extended public comment period.[3] These comments were supported by expert technical reports documenting potentially significant impacts to air quality, noise, and public health from the Project's construction and operational phases which the ND failed to disclose or mitigate.[4] In response, the City's consultant prepared Responses to Comments ("RTCs"), which assert that the ND complies with CEQA and that no EIR is required.[5]

On August 4, 2025, CREED LA submitted comments to the CPC demonstrating that the RTCs fail to cure the ND's fundamental analytical deficiencies.[6] These supplemental comments expand upon those concerns and are supported by CREED LA's air quality and public health expert, Dr. James J. Clark,

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[1] City of Los Angeles, Initial Study: KPAC Coil Avenue Freezer Expansion Project (Apr. 2025) (hereinafter "ND").
[2] City of Los Angeles, Department of City Planning, Recommendation Report re: 1420, 1500 North Coil Avenue; 1532, 1540, 1542 North Alameda Street (Aug. 14, 2025) (hereinafter "Recommendation Report"), *available at* https://planning.lacity.gov/plndoc/Staff_Reports/2025/08-14-2025/CPC_2022_6859.pdf.
[3] Letter to Norali Martinez City of Los Angeles from Andrew J. Graf, Adams Broadwell Joseph & Cardozo re: Comments on Negative Declaration for KPAC Coil Avenue Freezer Expansion Project (Case No. ENV-2022-6860-ND, SCH No. 2025041295) (June 12, 2025) (hereinafter "CREED LA ND Comments").
[4] *Id.*, attach. A-B.
[5] Letter to Norali Martinez, City of Los Angeles from Christian Kirkian, Meridian Consultants re: Response to Comments on the Negative Declaration (ND) for KPAC Coil Avenue Freezer Expansion Project (Case No. ENV-2022-6860-ND, SCH No. 2025041295) from Adams Broadwell Joseph & Cardozo letter dated June 12, 2025 (June 23, 2025) (hereinafter "RTCs").
[6] Letter to Monique Lawshe, City of Los Angeles from Andrew J. Graf, Adams Broadwell Joseph & Cardozo re: City Planning Commission 8/14/25 Hearing for 1420 Coil Avenue Freezer Expansion Project (CPC-2022-6859-GPA-HD-ZAD-WDI, ENV-2022-6860-ND) (Aug. 4, 2025) (hereinafter "CREED LA CPC Comments").

Ph.D.[7] The record contains substantial evidence from qualified experts supporting a fair argument that the Project may result in significant, unmitigated environmental impacts, including but not limited to noise, air quality, and public health effects. Under CEQA, the existence of such evidence triggers the City's obligation to prepare an EIR.[8]

The record also demonstrates that the City cannot make the necessary land use findings due to significant, unmitigated public health and environmental impacts. Accordingly, CREED LA respectfully urges the CPC to continue the public hearing, and direct Staff to prepare a legally adequate EIR.

II. THE CITY HAS NOT COMPLIED WITH CEQA

A. The RTCs Improperly Ignore Expert Evidence Demonstrating a Potentially Significant Cumulative Impact

Under CEQA, a lead agency must determine that a project may have a significant environmental impact if its effects, while individually limited, are cumulatively considerable.[9] A "cumulatively considerable" impact occurs when the project incremental effects are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects.[10] The City has not adequately considered how the Project's diesel particulate matter ("DPM") emissions, when combined with the severe air pollution resulting from past and ongoing sources in the area, may contribute to a significant cumulative impact on public health. Dr. Clark's health risk assessment prepared for this Project demonstrates that the Project's cancer risks could be significant when properly evaluated in the context of these existing environmental burdens.

Dr. Clark highlights that the draft cumulative impact guidance currently in development by the South Coast Air Quality Management District ("SCAQMD") is grounded in an "empirically validated and regionally specific assessment of background air toxics" through its reliance on SCAQMD's Multiple Air Toxics Exposure Study ("MATES") V. In fact, in that study, SCAQMD concludes that the largest contributor to cancer risk from air pollution is DPM emissions, contributing

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[7] **Exhibit A**, Letter to Andrew J. Graf, Adams Broadwell Joseph & Cardozo from James J. Clark, Clark & Associates re: Response to Comments from Meridian Consultants Regarding Draft Initial Study/Negative Declaration for KPAC Coil Avenue Freezer Expansion Project, Wilmington, CA (Case Number: ENV-2022-6860-ND) (Aug. 8, 2025) (hereinafter "Clark Supplemental Comments").
[8] *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928.
[9] Pub. Res. Code § 21083(b); 14 Cal. Code Regs. ("CEQA Guidelines") §§ 15064(h)(1); 15065(a)(3).
[10] Pub. Res. Code § 21083(b)(2); CEQA Guidelines §§ 15064(h)(1); 15065(a)(3).

approximately 50% of the cancer risk.[11] The MATES V data shows that "the zip code where the proposed Project is located already experiences an air toxic cancer risk of 664 in 1 million, a level 98% higher than the average for all other zip codes in the South Coast Air Basin. Notably, over 66% of that risk is attributable to DPM."[12] SCAQMD's findings constitute substantial evidence demonstrating that community exposure to DPM emissions in the Project vicinity is significant.

Dr. Clark's modeling demonstrates that Project would increase the cumulative cancer risk for nearby residential receptors by an additional 2.27 in 1 million, further exacerbating these impacts.[13] He concludes: "While 2.27 in 1 million may appear numerically small in isolation, it must be evaluated in the broader context of the existing (and future) pollution. In this context, the additional 2.27 in 1 million cannot be dismissed as negligible. Rather, it represents a statistically and ethically meaningful compounding of harm in a community that is already demonstrably overburdened by toxic emissions."[14] Dr. Clark's findings provide substantial evidence supporting a fair argument that the Project's cumulative health risk impacts are significant and unmitigated.

Moreover, SCAQMD has recommended that mobile source health risk assessments be performed if a warehouse project "generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially if heavy-duty diesel-fueled vehicles will be used."[15] SCAQMD has also expressed concern about adverse health impacts from warehouse expansion projects in close proximity to sensitive land uses, especially in communities located in or adjacent to multiple other existing warehouses and their associated truck activities, like the project site.[16] The City's assertion that cumulative health risk is insignificant is wrong.

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[11] South Coast Air Quality Management District, Multiple Air Toxics Exposure Study in the South Coast AQMD: Final Report (Aug. 2021) pp. ES-6, 2-63.
[12] Clark Supplemental Comments at p. 2.
[13] *Ibid.*
[14] *Ibid.*
[15] See e.g., Letter to Matthew Evans, City of Perris from Sam Wang, South Coast Air Quality Management District re: Notice of Preparation of a Draft Environmental Impact Report for First Industrial Logistics at Harley Knox and Indian Project (Proposed Project) (SCH No: 2025051368) (June 18, 2025) p. 2 (hereinafter "SCQAMD First Industrial Logistics NOP Comments"); see South Coast Air Quality Management District, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis (Aug. 2003), *available at* https://www.aqmd.gov/docs/default-source/ceqa/handbook/mobile-source-toxics-analysis.doc?sfvrsn=a86e1d61_2.
[16] SCQAMD First Industrial Logistics NOP Comments at p. 3.

B. The RTCs Fail to Adequately Address Operational Air Quality and Public Health Impacts

CREED LA commented that the ND underestimated operational emissions because it excluded key sources, including transportation refrigeration units ("TRUs").[17] In response, the RTCs acknowledge that TRU activity would increase by up to 40 trucks per day, but they assert – without evidentiary support – that this increase is not expected to materially affect localized DPM emissions.[18] This claim is unsubstantiated as neither the RTCs nor the ND provides any meaningful analysis of TRU emissions. The RTCs attempt to account for TRU-related emissions by increasing the passenger car input in the CalEEMod file as a proxy is inadequate and misleading.[19] CalEEMod does not quantify cancer risk or account for the unique emissions profile of TRUs.[20] Moreover, the RTCs' reliance on the California Air Resources Borad's TRU Airborne Toxic Control Measures is misplaced.[21] While TRUs are subject to regulatory requirements intended to reduce DPM emissions, these measures do not eliminate emissions or associated health risks.[22] TRUs continues to pose a significant health risk, particularly in communities already burdened by air pollution.[23]

Dr. Clark's comments reflect similar concerns previously raised by SCAQMD regarding another warehouse project involving the potential use of TRUs. In that case, SCAQMD noted that the CEQA document failed to quantify the number of TRUs expected to serve the site and did not estimate air pollutant emissions associated with their operation, citing that CalEEMod does not currently account for TRU emissions.[24] SCAQMD emphasized the need to calculate the potential cancer or health risk impacts associated with these TRUs.[25]

CREED LA also noted that the ND failed to account for emissions associated with cargo handling equipment and fire pumps.[26] In response, the RTCs updated

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[17] CREED LA ND Comments at pp. 9-11.
[18] RTCs at pp. 6-8.
[19] *Id.* at pp. 6-7.
[20] Letter to Nathan Perez, City of Perez from Sam Wang, South Coast Air Quality Management District re: Draft Environmental Impact Report (Draft EIR) for the Perris Airport Logistics Center Project (Proposed Project) (SCH No: 2023100540) (July 25, 2025) p. 5 (hereinafter "SCAQMD Perris Logistics Center DEIR Comments"), *available at* https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2025/july-2025/rvc250617-06.pdf?sfvrsn=c7cb6e7e_3.
[21] Clark Supplemental Comments at p. 4.
[22] *Ibid.*
[23] SCAQMD Perris Logistics Center DEIR Comments at p. 5.
[24] *Ibid.*
[25] *Ibid.*
[26] CREED LA ND Comments at pp. 9-11.

the CalEEMod model to include emissions from these sources.[27] However, while this revision addresses emissions estimates in a general sense, the RTCs still fail to evaluate the cancer risks associated with DPM emissions from these sources.[28] Without a health risk analysis, the ND remains incomplete and does not satisfy CEQA's requirement to disclose and evaluate potential significant health impacts.

III. THE CITY CANNOT MAKE THE NECESSARY LAND USE FINDINGS DUE TO SIGNIFICANT, UNMITIGATED PUBLIC HEALTH AND ENVIRONMENTAL IMPACTS

CREED LA commented that the City cannot lawfully make the required findings to approve these entitlements because the Project would result in significant, unmitigated public health and environmental impacts.[29] In response, the RTCs assert that the environmental analysis is adequate and, therefore, the land use findings are adequately supported.[30] As discussed in CREED LA's earlier submission to the CPC and in Section II of this letter, the RTCs fail to cure the ND's deficiencies, and substantial evidence in the form of expert opinions based on project-specific data demonstrates potential health and safety risks which are not mitigated. The Project's adverse effects on public health, air quality, noise, and other environmental factors would directly conflict with key policies aimed at protecting public health and welfare. As such, granting the requested approvals would be inconsistent with the General Plan and applicable community plan.

IV. CONCLUSION

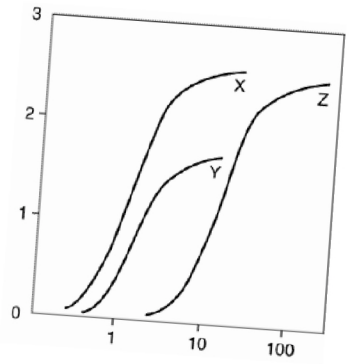
CREED LA respectfully urges the CPC to continue the public hearing and direct Staff to prepare an EIR that fully discloses, analyzes, and mitigates the Project's noise, air quality, and public health impacts, as required by CEQA.

Sincerely,

Andrew J. Graf

AJG:acp

[27] RTCs at pp. 7-8.
[28] Clark Supplemental Comments at p. 4.
[29] CREED LA ND Comments at pp. 18-19.
[30] RTCs at pp. 12-13.



Clark & Associates
Environmental Consulting, Inc.

OFFICE
12405 Venice Blvd
Suite 331
Los Angeles, CA 90066

PHONE
310-907-6165

EMAIL
jclark.assoc@gmail.com

August 8, 2025

Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

Attn: Mr. Andrew Graf

Subject: Response To Comments From Meridian Consultants Regarding Draft Initial Study/Negative Declaration For KPAC Coil Avenue Freezer Expansion Project, Wilmington, CA (Case Number: ENV-2022-6860-ND)

At the request of Adams Broadwell Joseph & Cardozo (ABJC), Clark and Associates (Clark) reviewed materials related to the responses prepared by Meridian Consultants (Meridian) dated June 23, 2025, regarding critiques offered on the Initial Study/Negative Declaration (ND) for the above-referenced Project.

Clark's review of the materials in no way constitutes a validation of the conclusions or materials contained within the plan. If we do not comment on a specific item this does not constitute acceptance of the item.

1. Response To Response 5/7: The Need For A Construction Health Risk Assessment And The Cumulative Risk Threshold

The assertions in Response 5 are inconsistent with the new regulatory guidance and risk assessment methodologies from the South Coast Air Quality Management District's (SCAQMD's) updated draft CEQA cumulative impact guidance, and misinterpret the toxicology of exposure to carcinogens. First, Response 5 states that the City relies on SCAQMD's CEQA Air Quality Handbook published in 1993 for the preparation of CEQA air quality analyses. Reliance on this 32-year-old document is misplaced given that SCAQMD initiated a public process in 2022 to update existing cumulative analysis guidance (which was originally developed in 2003, not 1993).

The updates include the Working Group's (WG) Conceptual/Potential Cumulative Health Risk Assessment protocols detailed in my previous letter. The draft protocol establishes significance thresholds based on MATES cancer risk percentiles. The MATES V (Multiple Air Toxics Exposure Study V), conducted by SCAQMD, includes a fixed site monitoring program, an updated emissions inventory of toxic air contaminants, and a modeling effort to characterize cancer risk across the basin. The purpose of the study is to characterize air toxic levels in highly impacted areas and better understand emissions from warehouses and other industrial uses. In other words, the MATES V study provides empirically validated and regionally specific assessment of background air toxics, particularly in overburdened communities, and must be considered when evaluating whether the incremental effects of the proposed warehouse expansion are cumulatively considerable.

As documented in the MATES V study, the zip code where the proposed project is located already experiences an air toxic cancer risk that of **664 in 1 million**, a level **98% higher than the average for all other zip codes in the South Coast Air Basin**. Notably, **over 66% of that risk is attributable to DPM**, a known toxic air contaminant associated with construction equipment, warehouse-related goods movement, and heavy-duty truck emissions. This underscores the community's existing disproportionate pollution burden and highlights the need for heightened scrutiny of a project that could further exacerbate these health risks.

Based on the emissions data in the ND and regulatory-approved health risk assessment methodologies, the project-specific air quality modeling outlined in my prior comment letter demonstrates that the proposed warehouse expansion would increase the cumulative cancer risk for nearby residential receptors by an additional 2.27 in 1 million. While 2.27 in 1 million may appear numerically small in isolation, it must be evaluated in the broader context of the existing (and future) pollution. In this context, the additional 2.27 in 1 million cannot be dismissed as negligible. Rather, it represents a statistically and ethically meaningful compounding of harm in a community that is already demonstrably overburdened by toxic emissions.

Second, the claim that an evaluation of construction TAC emissions is not warranted because the exposure period is only 15 months is flat out wrong. Diesel exhaust, particularly DPM, is classified by the State of California as a TAC. Diesel exhaust is linked to serious health problems including

increased respiratory disease, lung damage, cancer, and premature death.[1,2,3],[4] TACs, including DPM[5], contribute to a host of respiratory impacts and may lead to the development of various cancers.

DPM is recognized by state and federal agencies as causing severe health risk because it contains toxic materials, unlike $PM_{2.5}$ and PM_{10}.[6] Exposure to DPM increases the risk of lung cancer and causes non-cancer effects including chronic bronchitis, inflammation of lung tissue, thickening of the alveolar walls, immunological allergic reactions, and airway constriction.[7] Failing to quantify carcinogenic and other health risk impacts place the community at risk for unwanted adverse health impacts. *Even brief exposures to the TACs could lead to the development of adverse health impacts over the life of an individual.*

TACs are not adequately captured by localized significance thresholds because LSTs were developed by SCAQMD to specifically assess localized impacts from criteria pollutants, not TACs. Instead, health risks from TACs are typically assessed through modeled exposure using the Office of Environmental Health Hazard Assessment (OEHHA) guidance. OEHHA recommends that cancer risks for projects lasting longer than 2 months, including construction activities, be evaluated in accordance with its risk assessment guidelines.[8] As discussed above, the modeling shows an incremental cancer risk increase of 2.21 in 1 million, which is significant given the severity of existing air pollution.

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[1] California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, Staff Report, June 1998; see also California Air Resources Board, Overview: Diesel Exhaust & Health, https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health#:~:text=Diesel%20Particulate%20Matter%20and%20Health&text=In%201998%2C%20CARB%20identified%20DPM,and%20other%20adverse%20health%20effects.

[2] U.S. EPA, Health Assessment Document for Diesel Engine Exhaust, Report EPA/600/8-90/057F, May 2002.

[3] Environmental Defense Fund, Cleaner Diesel Handbook, Bring Cleaner Fuel and Diesel Retrofits into Your Neighborhood, April 2005; http://www.edf.org/documents/4941_cleanerdieselhandbook.pdf, accessed July 5, 2020.

[4] California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, Staff Report, June 1998.

[5] Because DPM is a TAC, it is a different air pollutant than criteria particulate matter emissions such as PM10, PM2.5, and fugitive dust. DPM exposure causes acute health effects that are different from the effects of exposure to PM alone.

[6] Health & Safety Code § 39655(a) (defining "toxic air contaminant" as air pollutants "which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health. A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the federal act (42 U.S.C. Sec. 7412 (b)) is a toxic air contaminant.")

[7] Findings of the Scientific Review Panel on The Report on Diesel Exhaust as adopted at the Panel's April 22, 1998 Meeting.

[8] Office of Environmental Health Hazard Assessment, Guidance Manual for Preparation of Health Risk Assessments. Feb. 2015. p. 8-17 to 8-18.

2. Response To Response 8: The Air Quality Analysis Fails To Analyze Emissions from Transportation Refrigeration Units, Cargo Handling Onsite, And Fire Pumps

Meridian's responses regarding the impacts of Transport Refrigeration Units (TRUs), cargo handling equipment onsite, and fire pumps are non-responsive.

With respect to TRUs, Meridian acknowledges that the total number of trucks using the project site will incrementally increase up to 33%.[9] This necessarily implies a corresponding increase in DPM emissions from project operations – also up to 33%. However, the response dismisses the potential impact of these increased emissions by asserting that they are not expected to materially increase localized DPM emissions, despite the absence of any quantitative analysis to support this conclusion. Notably, the response (and the ND) fails to evaluate whether operational DPM emissions fall below SCAQMD (or any other) significance thresholds.

As discussed above, the background cancer risk in the project area is already 664 in one million. More than 66% of the risk is attributable to DPM exposure, which is directly linked to heavy-duty diesel truck activity, including TRUs. In this context, any additional increase in DPM emissions form the proposed project must be considered cumulatively significant, particularly in the absence of a health risk assessment or dispersion modeling that demonstrates otherwise.

With regards to emissions from cargo handling equipment and fire pumps, the response provides updated CalEEMod modeling data which includes these components. While the updated analysis quantifies criteria pollutant emissions, it does not analyze the incremental cancer risks due to additional DPM emissions associated with these sources. Therefore, the analysis remains deficient.

Conclusion

The facts identified and referenced in this comment letter lead me to reasonably conclude that the Project could result in significant impacts if allowed to proceed. A draft environmental impact report should be prepared to address these substantial concerns.

Sincerely,

[9] TRU activity would increase by 30 to 40 trucks per day from the current 110 to 120. (40/120 = 33.33%).

Applicant Copy
Office: Van Nuys
Application Invoice No: 105259

68001105259

City of Los Angeles
Department of City Planning

City Planning Request

NOTICE: The staff of the Planning Department will analyze your request and accord the same full and impartial consideration to your application, regardless of whether or not you obtain the services of anyone to represent you.

This filing fee is required by Chapter 1, Article 9, L.A.M.C.

If you have questions about this invoice, please contact the planner assigned to this case. To identify the assigned planner, please the assigned planner, please visit https://planning.lacity.gov/pdiscaseinfo/ and enter the Case Number.

Payment Info: $218.94 was paid on 10/10/2025 with receipt number 200329088868

Applicant: (Coalition For Responsible Equitable Economic Development)
Representative: Andrew Graf (Adams Broadwell Joseph & Cardozo)
Project Address: 1420 N COIL AVE, 90744

NOTES: Appeal of entire decision by an aggrieved party

CPC-2022-6859-GPA-HD-ZAD-WDI-1A			
Item	Fee	%	Charged Fee
Appeal by Person Other Than The Applicant	$178.00	100 %	$178.00
		Case Total	**$178.00**
		* Fees Subject to Surcharges	$178.00
		Fees Not Subject to Surcharges	$0.00
		Plan & Land Use Fees Total	$0.00
		Expediting Fee	$0.00
		Development Services Center Surcharge (3%)	$5.34
		City Planning Systems Development Surcharge (6%)	$10.68
		Operating Surcharge (7%)	$12.46
		General Plan Maintenance Surcharge (7%)	$12.46

* Fees Subject to Surcharges	$178.00
Fees Not Subject to Surcharges	$0.00
Plan & Land Use Fees Total	$0.00
Expediting Fee	$0.00
Development Services Center Surcharge (3%)	$5.34
City Planning Systems Dev. Surcharge (6%)	$10.68
Operating Surcharge (7%)	$12.46
General Plan Maintenance Surcharge (7%)	$12.46
Grand Total	$218.94
Total Overpayment Amount	$0.00
Total Paid (amount must equal sum of all checks)	$218.94

Council District:
Plan Area:
Processed by STEVEN WECHSLER on 10/9/2025

Signature: _____

LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300
www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: SEPTEMBER 25, 2025

Case No.: CPC-2022-6859-GPA-HD-ZAD-WDI Council District: 15 – McOsker
CEQA: ENV-2022-6860-ND (SCH. NO. 2025041295)
Plan Area: Wilmington – Harbor

Project Site: 1420, 1500 North Coil Avenue; 1532, 1540, 1542 North Alameda Street

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

At its meeting of **August 14, 2025**, the Los Angeles City Planning Commission took the actions below in conjunction with the following Project:

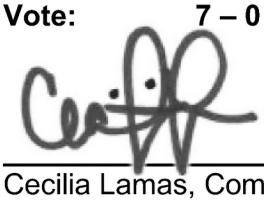
Improvement and expansion of an existing one-story, 42-foot tall, 221,496 square-foot cold storage facility, resulting in a two-story, 65-foot tall, 267,960 square foot facility, with a total 0.36:1 Floor Area Ratio (FAR). The expansion includes the demolition of 27,157 square feet of an existing cold 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.

1. **Found**, 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; **Found** the Negative Declaration reflects the independent judgment and analysis of the City; **Adopted** the Negative Declaration;
2. **Approved** and **recommended** that the Mayor and City Council **adopt** the attached resolution, pursuant to City Charter Section 555 and Section 11.5.6 of the Los Angeles Municipal Code (LAMC), 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. **Approved** and **recommended** that the City Council **adopt** the attached ordinance, pursuant to LAMC Section 12.32, for a Height District Change from Height District No. 1VL to 1L;
4. **Approved**, 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. **Denied** pursuant to LAMC Section 12.37, a Waiver of Dedication and Improvements from a 15-foot dedication and all improvement requirements along Coil Avenue;
7. **Adopted** the attached Conditions of Approval; and
8. **Adopted** the attached Findings.

The vote proceeded as follows:

Moved: Lawshe
Second: Choe
Ayes: Cabildo, Diaz, Mack, Saitman, Zamora
Absent: Klein

Vote: 7 – 0



Cecilia Lamas, Commission Executive Assistant II
Los Angeles City Planning Commission

Fiscal Impact Statement: There is no General Fund impact as administrative costs are recovered through fees.

APPEAL PERIOD - EFFECTIVE DATE

The decision of the Los Angeles City Planning Commission as it relates to the General Plan Amendment is not further appealable and will proceed to the City Council for final decision. The Height District Change is appealable by the Applicant only if disapproved in whole or in part by the Commission. The decision of the Commission regarding the remaining approvals are appealable to the Los Angeles City Council within **20 days** after the mailing date of this determination letter. Any appeal not filed within the 20-day period shall not be considered by the Council.

FINAL APPEAL DATE: OCTOBER 15, 2025

Notice: An appeal of the CEQA clearance for the Project pursuant to Public Resources Code Section 21151(c) is only available if the Determination of the non-elected decision-making body (e.g., ZA, AA, APC, CPC) **is not further appealable** and the decision is final.

This grant is not a permit or license and any permits and/or licenses required by law must be obtained from the proper public agency. If any Condition of this grant is violated or not complied with, then the applicant or their successor in interest may be prosecuted for violating these Conditions the same as for any violation of the requirements contained in the Los Angeles Municipal Code (LAMC).

This determination will become effective after the end of appeal period date listed above, unless an appeal is filed with the Department of City Planning. An appeal application must be submitted and paid for before 4:30 PM (PST) on the final day to appeal the determination. Should the final day fall on a weekend or legal City holiday, the time for filing an appeal shall be extended to 4:30 PM (PST) on the next succeeding working day. Appeals should be filed early to ensure the Development Services Center (DSC) staff has adequate time to review and accept the documents, and to allow appellants time to submit payment.

An appeal may be filed utilizing the following options:

Online Application System (OAS): The OAS (https://planning.lacity.gov/oas) allows entitlement appeals to be submitted entirely electronically by allowing an appellant to fill out and submit an appeal application online directly to City Planning's DSC, and submit fee payment by credit card or e-check.

Drop off at DSC. Appeals of this determination can be submitted in-person at the Metro or Van Nuys DSC locations, as well as the South Los Angeles DSC on Tuesdays and Thursdays, and payment can be made by credit card or check. City Planning has established drop-off areas at the DSCs with physical boxes where appellants can drop off appeal applications; alternatively, appeal applications can be filed with staff at DSC public counters. Appeal applications must be on the prescribed forms, and accompanied by the required fee and a copy of the determination letter. Appeal applications shall be received by the DSC public counter and paid for on or before the above date or the appeal will not be accepted.

Forms are available online at http://planning.lacity.gov/development-services/forms. Public offices are located at:

Metro DSC	Van Nuys DSC	South LA DSC
201 N. Figueroa Street Los Angeles, CA 90012 planning.figcounter@lacity.org (213) 482-7077	6262 Van Nuys Boulevard Van Nuys, CA 91401 planning.mbc2@lacity.org (818) 374-5050	8475 S. Vermont Avenue,1st Floor Los Angeles, CA 90044 (In person appointments available on Tuesdays and Thursdays 8am-4pm only) planning.southla@lacity.org

City Planning staff may follow up with the appellant via email and/or phone if there are any questions or missing materials in the appeal submission, to ensure that the appeal package is complete and meets the applicable LAMC provisions.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

Verification of condition compliance with building plans and/or building permit applications are done at the City Planning Metro or Valley DSC locations. An in-person or virtual appointment for Condition Clearance can be made through the City's BuildLA portal (appointments.lacity.gov). The applicant is further advised to notify any consultant representing you of this requirement as well.

QR Code to Online Appeal Filing

QR Code to Forms for In-Person Appeal Filing

QR Code to BuildLA Appointment Portal for Condition Clearance

Attachments: Ordinance, Maps, Conditions of Approval, Findings, Resolution

cc: Theodore L. Irving, Principal City Planner
Connie Chauv, Senior City Planner
Norali Martinez, City Planner

ORDINANCE NO. _____

An ordinance amending Section 12.04 of the Los Angeles Municipal Code by amending the zoning map.

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section 1. Section 12.04 of the Los Angeles Municipal Code is hereby amended by changing the zone and zone boundaries shown upon a portion of the zone map attached thereto and made a part of Article 2, Chapter 1 of the Los Angeles Municipal Code, so that such portion of the zoning map shall be as follows:


(T)[Q]M3-1L-CUGU
(T)[Q]MR2-1L-CUGU
(T)[Q]MR2-1L-CUGU
(T)[Q]MR2-1L-CUGU
EXISTING ZONE LINE
EXISTING ZONE LINE
EXISTING ZONE LINE
EXISTING ZONE LINE
SELY LINE OF TR 584
SW'LY LINE LOT 2, TR 13038
40.73
46.78
N 29° 46' 27" W
133.50
55.75
40.25
319.65
140
N 15° 28' 10" E
120.36
N 17° 18' 21" W
253.48
40
51.37
58.78
132.96
40
50
26.73
N 86° 36' 16" E
Q ST
GAMBLE AVE
SANDISON ST
CRUCES ST
DRUMM AVE
O ST
O ST
ALAMEDA ST
ALAMEDA ST
COLON ST
COLON ST
COLON ST
COIL AVE
BLINN AVE
PACIFIC COAST HWY
0
250
500
Feet
CPC-2022-6859-GPA-HD-ZAD-WDI
CF/aa
082025
Data Sources: Department of City Planning & Bureau of Engineering
City of Los Angeles
Wilmington - Harbor City

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) – 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. 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. A minimum depth with a height ranging from 15 to 40 feet shall be 42 inches.
    b. A minimum depth with a height ranging from 1 to 15 feet shall be 24 to 36 inches.
    c. A minimum depth with a height of less than 1 foot shall be 18 inches.
    d. 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:
    e. 220 cubic feet for trees with a canopy diameter ranging from 15 to 19 feet.
    f. 400 cubic feet for trees with a canopy diameter ranging from 20 to 24 feet.
    g. 620 cubic feet for trees with a canopy diameter ranging from 25 to 29 feet.
    h. 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 uses[1]. 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.

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[1] 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 acjacent 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 acjacent 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 acjacent 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 polies 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 polices 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 serves 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 of 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 balances 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.

RESOLUTION

WHEREAS, the subject property is located within the area covered by the Wilmington-Harbor City Community Plan ("Community Plan"), which was adopted by the City Council on July 14, 1999 (CF 98-1619); and

WHEREAS, the applicant is proposing 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 improvements and 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; and

WHEREAS, to carry out the above-referenced project, the applicant has requested a General Plan Amendment to amend Footnote No. 10 of the Community Plan to allow a site-specific 65-foot height limit; and

WHEREAS, the General Plan Amendment is consistent with Charter Sections 555, 556, and 558, representing an Amendment in Part of the Wilmington-Harbor City Community Plan, representing a change to the social, physical and economic identity of the project site; and

WHEREAS, the City Planning Commission at its meeting of August 14, 2025, approved the foregoing General Plan Amendment; and

WHEREAS, the General Plan Amendment is necessary to achieve and maintain consistency between zoning and the adopted Community Plan as required by California State law; and

WHEREAS, pursuant to the provisions of the Los Angeles City Charter, the Mayor and the City Planning Commission have transmitted their recommendations; and

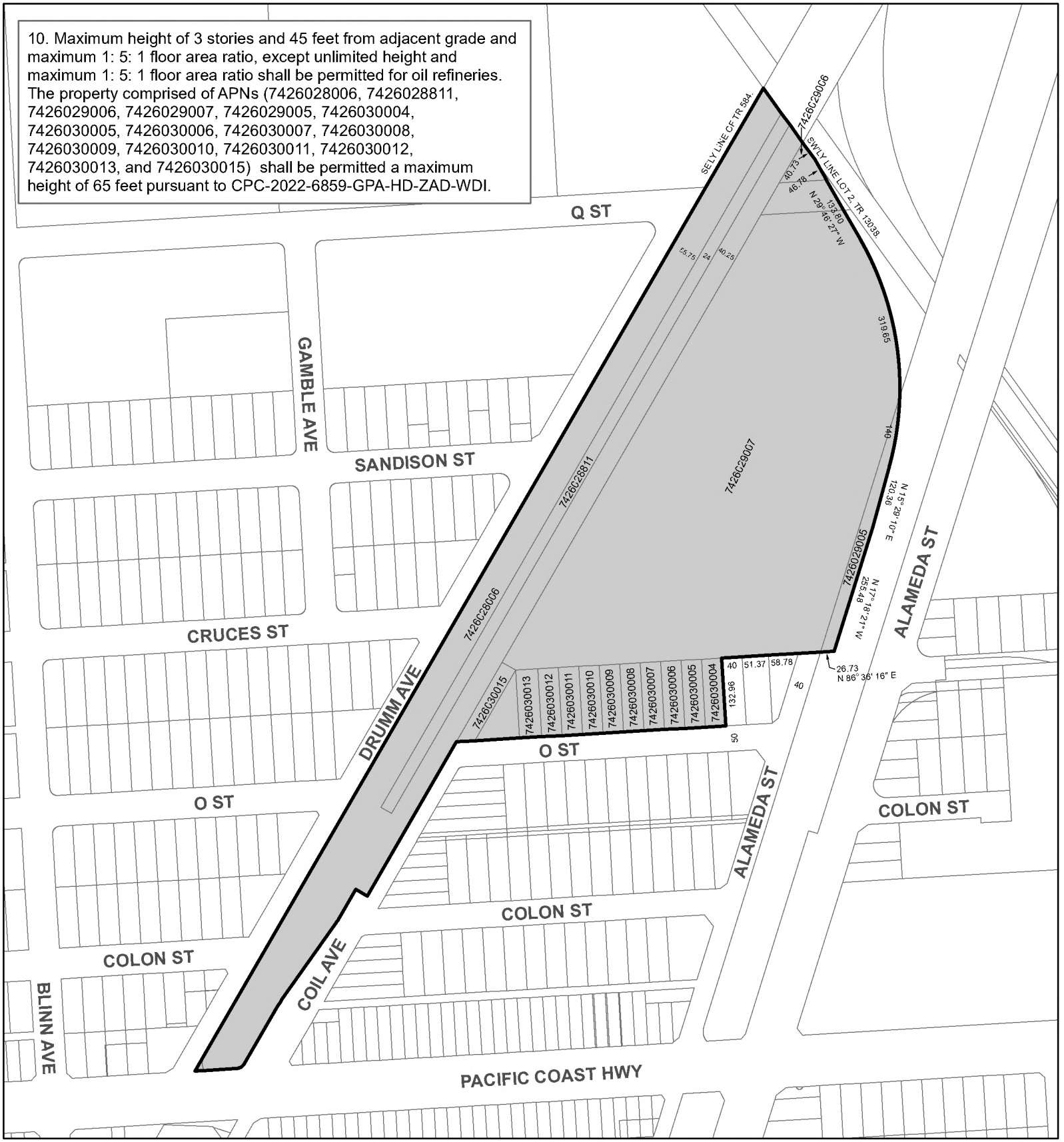
WHEREAS, the requested General Plan Amendment is consistent with the intent and purpose of the Wilmington-Harbor City Community Plan to designate allowable heights in an orderly and unified manner; and

WHEREAS, the subject request would provide for a more logical and uniform pattern of planned land use development that is compatible with surrounding land use designations on the General Plan; and

WHEREAS, the project has been reviewed by Negative Declaration, ENV-2022-6860-ND, in accordance with the City's Guidelines for implementation of the California Environmental Quality Act ("CEQA") by the City Planning Department.

NOW, THEREFORE, BE IT RESOLVED that the Community Plan shall be amended as shown on the attached General Plan Amendment Map.

10. Maximum height of 3 stories and 45 feet from adjacent grade and maximum 1: 5: 1 floor area ratio, except unlimited height and maximum 1: 5: 1 floor area ratio shall be permitted for oil refineries. The property comprised of APNs (7426028006, 7426028811, 7426029006, 7426029007, 7426029005, 7426030004, 7426030005, 7426030006, 7426030007, 7426030008, 7426030009, 7426030010, 7426030011, 7426030012, 7426030013, and 7426030015) shall be permitted a maximum height of 65 feet pursuant to CPC-2022-6859-GPA-HD-ZAD-WDI.



Footnote #10 amended for the Wilmington - Harbor Community Plan General Plan Land Use Map.

0 250 500 Feet

CPC-2022-6859-GPA-HD-ZAD-WDI

CF/ RJ WILMINGTON - HARBOR CITY 082025

Data Sources: Department of City Planning & Bureau of Engineering

City of Los Angeles