

## **Appendix F4**

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Response to SWAPE Letter Comments

February 10, 2020

## MEMORANDUM

TO: Bill Halligan, Placeworks

FROM: SCS Engineers (prepared by Ashley Hutchens)

SUBJECT: Response to Swape Letter Comments – re: Prologis Vermont and Redondo Beach Blvd. Industrial Project

Upon review of the letters included as Exhibit B in the Appeal Applications by Jean Talaro and Rosalie Preston summarizing *Comments on the 15116-15216 South Vermont Ave & 747-761 W. Redondo Beach Blvd; Harbor Gateway (ENV-2017-1015) Project* prepared by Matt Hagemann of Swape, both dated March 29, 2018, SCS has prepared the following responses with respect to the Phase I Environmental Site Assessment prepared by SCS Engineers dated October 2016..

### Introduction

As background, the City Planning Commission previously approved the Project on March 22, 2018 by conditionally approving two conditional use permits (12.24 U.14; 12.24 W.27), a Zoning Administrator's Adjustment (12.28 A) and a Site Plan Review (16.05) allowing the development of a 341,402 square foot warehouse, as set forth in a March 16, 2018 Letter of Determination. The CEQA document originally prepared for that approval was a mitigated negative declaration (MND). Following the Planning Commission's approval of the Project, two appellants appealed the Project. In order to accommodate the appellants' requests, the City is now preparing an EIR prior to the Project moving forward to the City Council by way of the appeal.

While the City stands by the adopted MND, the EIR prepared for the Project will necessarily be more "conservative" than the MND and will therefore reflect additional impacts.

The Project site was previously developed with four buildings totaling 505,291 square feet, including a church (3,858 square feet), a building at 15134 Vermont Avenue (157,237 square feet), and two two-story buildings at 747 W. Redondo Beach Boulevard (192,792 and 151,404 square feet) and a gas station at the southwestern corner. All above-grade structures were demolished in 2010 and 2011.

### Responses

**Comment 1 – page 2, full paragraph 1.** The Swape letter provided a summary of the Phase I Environmental Assessment (ESA) and its conclusions. The Phase I ESA was prepared by SCS Engineers (SCS), dated October 2016. The letter claims that the IS/MND defers mitigation to address contaminants known to be associated with the former industrial uses at the Property. The letter states "more analysis and disclosure is needed in a DEIR, such as a Phase II Environmental Site Assessment. A DEIR should be prepared to include the results of further assessment of contaminant releases under a signed voluntary cleanup agreement with the California Department of Toxic Substances Control to ensure protection of construction worker safety and health of nearby residents."



**Response:** SCS conducted a Phase II Investigation at the subject site in October 2016, the results of which are summarized in the SCS report dated November 8, 2018, *Phase II Soil and Soil Vapor Investigation Report, Walmart Chapman Site*. The Phase II is attached hereto and incorporated by reference. Findings from the Phase II have been incorporated into the DEIR. Furthermore, the former Electricord area (eastern half of the property) is currently an active Cleanup Program Site overseen by the Los Angeles Regional Water Quality Control Board (LARWQCB, Global ID SLO603729001). Eight groundwater monitoring wells exist on the Electricord portion of the property that are currently monitored on a semiannual basis. The LARWQCB has issued a letter dated August 14, 2019, which requested a revised Workplan for the Electricord site which is required to include installation of two new groundwater wells, as well as additional groundwater monitoring. On-going investigations and monitoring are also documented in the DEIR. The California Department of Toxic Substances Control would not be involved in this project.

**Comment 2 – page 3, full paragraph 1.** The letter again references that “despite the heavy industrial use of the site and documentation of chemical release, the IS/MND defers mitigation, to include investigation as recommended in the Phase I, until prior to the issuance of grading permits.”

**Response:** SWAPE’s assertions are wrong. As stated above, SCS conducted a Phase II Investigation in October 2016. The investigation assessed all the recognized environmental conditions that SCS identified in the Phase I ESA. The Phase II Investigation will be provided for review in the DEIR. Additionally, a Soil Management Plan (SMP) was prepared by SCS to address known and/or potential impacted areas encountered during any grading, demolition or construction activities. The SMP will be in effect during soil moving activities and includes explicit instructions for the appropriate handling, storage and disposal of any known or potentially impacted soil. In addition, the SMP requires air monitoring activities to monitor the air downwind of the project site and appropriate Health and Safety Plans will be employed by site workers. The SMP is attached hereto and incorporated by reference.

**Comment 2 – page 3, full paragraphs 2 and 3.** The letter says that “the regulatory process should be allowed to proceed to completion prior to any approval of the proposed project. A Phase II should be performed. The data gaps are too large and invalidate the IS/MND’s as an adequate information document. Only after investigations and cleanup are documented in a DEIR, can impacts be disclosed and mitigated. Investigations and cleanup should be conducted under a voluntary cleanup agreement with the California Department of Toxic Substances Control.

Additionally, impacts from cleanup activities, including air quality impacts from excavation, truck trips from soil disposal and dust generation, for example, are not contemplated in the IS/MND. A DEIR is necessary to evaluate and disclose these impacts and to mitigate them for the protection of worker safety and the health of nearby residents who would be potentially exposed to contaminated dust.”

**Response:** As discussed under “Background,” an EIR has been prepared as requested by the commenter. Further, a Phase II Investigation has been conducted and the environmental impacts at the site are well understood. There has been significant regulatory involvement in remedial activities performed at the site to date and regulatory closures have been issued for various areas of the project site by either the LARWQCB or the City of Los Angeles Fire Department (LAFD). These closure activities are discussed in the Phase I ESA. One open case remains, with oversight by the LARWQCB, for the eastern half of the subject site, formerly occupied by Pacific Electricord Company. Routine groundwater monitoring is being conducted and there are currently plans to do additional work (a revised workplan is due to the LARWQCB on October 31, 2019). Redevelopment and/or construction activities commonly occur on contaminated sites while regulatory cases remain open. Proper monitoring will be conducted under the SMP that will be in effect during redevelopment

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activities. If any future work needs to be conducted with regulatory oversight, the appropriate regulatory agency for oversight would continue to be the LARWQCB. The California Department of Toxic Substances Control would not be involved in this project.

The DEIR has analyzed air quality impacts related to all construction activities, including but not limited to excavation, trucks trips, soil disposal and dust generation.