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HARBOR GATEWAY NORTH NEIGHBORHOOD COUNCIL

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August 15, 2024

Elsa Rodriguez, Principal Planner Metro Development Services
Los Angeles County – Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

Re: Rexford Industrial truck storage/ warehouse at 400-422 W. Rosecrans Avenue in Unincorporated Los Angeles County West Rancho Dominguez-Victoria Standards District and Green Zones District (Plan Number RPPL2023001916) and façade improvements to office space at 14400 S. Figueroa Street in the City of Los Angeles

Dear Ms. Rodriguez:

On August 13, 2024, our Board voted 12-0-0 to send this comment letter on the Rexford Industrial application for a truck storage/warehouse at 400-422 W. Rosecrans Avenue (Unincorporated Los Angeles County-West Rancho Dominguez-Victoria Community Standards District and Green Zones District), (Plan Number RPPL2023001916) and façade improvements to the office space at 14400 S. Figueroa Street (City of Los Angeles), which is being handled by the Department of Building and Safety for the City of Los Angeles, as all proposals for that address are “by right.”

We would like to acknowledge that Rexford Industrial did reach out to us regarding this project and presented at our April 25, 2024, Planning and Land Use Committee, also attended our June 4 Special Board meeting with some additional clarifications about the project, and members of their team were present on June 27, 2024, for our Planning and Land Use Committee meeting, which considered a revised draft letter, at our July 9 Board meeting, our July 25 Planning and Land Use Committee meeting, and at our August 13 Board meeting, where this comment letter was approved.

In regards to the office space, 14400 S. Figueroa Street, which is within the boundaries of the City of Los Angeles and the Harbor Gateway Community Plan, we appreciate and support Rexford Industrial’s efforts to upgrade the exterior façade and landscaping. This portion of the project faces onto the industrial corridor along Figueroa Street, which covers both sides of Figueroa Street from 149th Street to El Segundo Blvd. and the west side of Figueroa Street from 149th Street south to the 91 freeway. The six new trees (“Tuskegee” crape myrtles), additional landscaping, and improved facade will definitely upgrade the property on the Figueroa Street side and elevate the appearance of this section of the industrial corridor.

In regards to the 400-422 W. Rosecrans Avenue part of the project in the unincorporated Los Angeles County area and within the Rancho Dominguez-Victoria Standards District of the unincorporated Los Angeles County area, just to the east of the City of Los Angeles boundary line, we wish to express the following concerns on behalf of our stakeholders who live to the west of the project across Figueroa Street and within 500 feet of the future warehouse space with 31 truck docks.

1) Potential **noise impacts** for residential uses, particularly at night, from loading/unloading related to activities on the property. The proposed project's loading docks will be approximately 400 feet from homes at Figueroa Street and 146th Street and less than 500 feet from homes on Denver at 144th Street. While a traffic study was conducted by Overland Traffic Consultants, no professional sound study was undertaken.

- Only loading and unloading of trucks directly into the enclosed warehouse building should occur after 6 p.m. Sound generated from the site after 6 p.m. shall not exceed 45 dB. (Los Angeles County Zoning Ordinance Section 12.08.380 Environmental Protection-Noise zones designated-- Noise Zones I and II; and Section 22.44.1610-B Planning and Zoning-Noise "Locate noise-tolerant uses within developed areas. Encourage sensitive building orientation, placing the most noise-tolerant portions of a project between sensitive portions and the noise source, and architectural design as the noise management strategies preferred over constructing noise barriers.")
- Loading docks must contain foam gasket seals and enhanced bumpers and/or other measures to reduce dock mating noise and also a fully covered roof area enclosed by roll up doors for the loading docks.
- The use of "white noise" or multi-frequency quiet alarms on all trucks and equipment moving outdoors after 6 p.m. so that the backup beepers traditionally used to indicate backing up operations not create a noise pollution impact for the nearby residents and this should be required via the leasing agreement.

2) Although the project reduces the size of the previous buildings on site and previous potential number of daily truck trips, there will still remain an **air pollution impact** to residential uses (homes) on the south side of Rosecrans Avenue between the 110 Harbor freeway and Figueroa Street from the 96 daily vehicle (truck/car) trips going to the warehouse and exiting from the warehouse to enter the 110 Harbor Freeway.

- Lease agreements with future tenants should include a requirement that zero-emission heavy duty trucks are required to travel to and from the project site by a specified date, such as 2035.
- Any heavy duty truck idling or queuing off site should be prohibited and that prohibition included in leasing agreements.
- There should be no heavy duty truck access from the Figueroa Street side of the project and this should be clearly posted; only access from the driveway at 400-422 W. Figueroa Street for heavy duty trucks shall be permitted.

3) Potential traffic impacts of trucks leaving the warehouse and turning west over the eastbound lanes of Rosecrans Blvd. even with the existing two-way left turn lane on Rosecrans Avenue.

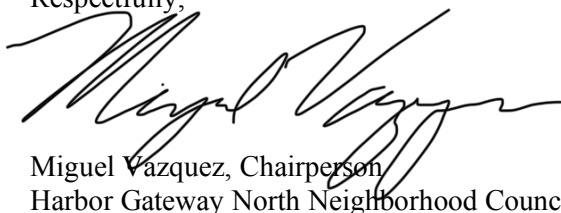
An additional concern, for the future workers in the warehouse part of the project is a lack of air conditioning. Representatives for Rexford Industrial indicated during their presentation to the HGNNC

Planning and Land Use Committee on April 25, 2024, that air conditioning was not needed as the site is located in the coastal zone and would not see the high temperatures that would be common for warehouses located in the Inland Empire, for example, and that ceiling fans would be adequate for overly hot days. There will also be sixty vented skylights which, when opened, will produce additional airflow. However, with the impact of global warming, our neighborhood is seeing many more high 90's and 100 degree temperatures. Ceiling fans alone are unlikely to be able to cool the interior of the warehouse to below 87 degrees, per the recently adopted Cal/OSHA standards for indoor air temperatures. It would seem prudent to plan for the future by installing a heat pump heating/cooling system with solar panels so that the building is ready to provide proper cooling for days of higher temperatures in the future.

We also would like to point out that there needs to be a more formal means of communication and coordination between the Los Angeles County Department of Regional Planning and the City of Los Angeles for areas where the two jurisdictions share boundaries, particularly where development in the County of Los Angeles impacts residents on the west side of Figueroa Street. For example, we would have liked to receive notification of this project last year, when the application was first filed. And going forward, we would like to see the County of Los Angeles add to the Green Zones ordinance a requirement that buffer zones between manufacturing/industrial uses and residential uses be extended from the current 100 feet to 1,000 feet.

Additionally, one of our goals is to see higher quality usages for the industrial facilities that line our Figueroa Corridor, as opposed to warehousing that involves large truck traffic and is considered a "heavier industrial use." Per the CalEnviroScreen 4.0, all of the Harbor Gateway North areas along Figueroa Street, up to 120th street, in the Harbor Gateway Community Plan area, meet the criteria of being "disadvantaged communities." With that in mind, the Harbor Gateway Community Plan update recommends encouraging "green, sustainable industries that bolster the economic base and provide high-skill and high-wage job opportunities for local residents." The updated Community Plan also calls for "the transition of industrial land uses from heavier industrial uses to lighter industrial uses, in close proximity to residential neighborhoods to minimize the negative environmental and visual impacts to the community."

Respectfully,



Miguel Vazquez, Chairperson
Harbor Gateway North Neighborhood Council

cc: Councilmember Tim McOsler – Council District 15
Pamela Thornton, Planning Director – Council District 15
Nicholas Chavez, Field Deputy - Council District 15
Jocelyn Dominguez – Harbor/Watts Representative for Mayor Karen Bass
Josh Gertler, President and CEO – Consensus (representing Rexford Industrial)
California Attorney General – Bureau of Environmental Justice
Cal/OSHA



**Rexford
Industrial**

June 4, 2024

Board of Directors
Harbor Gateway North Neighborhood Council
P.O. Box 3723
Gardena, CA 90247

RE: 14400 S. Figueroa Street/400-422 W. Rosecrans Avenue

Honorable Board Members:

Thank you for the opportunity to meet and present our project to your Planning and Land Use Committee in April. We have reviewed your draft letter to the Planning Director of Council District 15 and are grateful for your expression of support and your positive comments about our plans to elevate the appearance of this area.

In advance of tonight's scheduled Special Board Meeting, we want to address the comments outlined in this letter in advance of your scheduled vote tonight.

Issue One: *Concerns for the truck storage/warehouse part of the project in the unincorporated Los Angeles County area include: Potential noise impact on residential uses, particularly at night, from trucking related activities on the southeast side of the property, which is less than 300 feet from homes at Figueroa Street and 146th Street and less than 400 feet from homes on Denver at 144th Street. A bare minimum sound review was conducted while a full review should have been performed, especially in light of the 24/7 operation of the future facility.*

Response: Please note that 24/7 operation of the facility is not proposed. The application for the project states that outdoor operations will be limited to 8:00 AM to 6:00 PM daily, with the exception of loading and unloading at the warehouse building's truck docks. Therefore, if a future tenant conducts nighttime operations, they will be contained within the warehouse building where noise impacts to vicinity properties will be negligible. Please note that the existing warehousing and manufacturing uses on the site currently do not have any operating hours restrictions, so this project's proposed restrictions on outdoor operations between 6:00 PM and 8:00 AM daily would mark a significant improvement over the existing conditions.

The truck docks are located toward the rear of the property, which not only places the docks further away from the nearest homes, but also takes advantage of several layers of sound and visual buffers between the docks and the nearest homes. The nearest truck docks are approximately 550 feet from the nearest homes on Denver Avenue and approximately 400 feet from the nearest homes on 146th Street. The line of sight and noise transmission between the docks and the nearest homes would be interrupted by new proposed gates, several existing industrial buildings on the east side of Figueroa Street, the Figueroa Street right-of-way, and several existing industrial buildings on the west side of Figueroa.



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Please also note that due to the existing arrangement of buildings on the site, trucks are currently forced to exclusively use Figueroa Street to access the bulk of the site, bringing truck-related noise impacts closer to the homes west of Figueroa. The proposed site plan would allow for trucks to exclusively use Rosecrans Avenue to access the entire site. This would again mark a significant improvement over the existing conditions as additional truck-related noise impacts are diverted further away from these homes.

Between the new operating hours restrictions, the strategic location of the new truck docks tucked toward the rear of the property behind several layers of sound and visual buffers, and the new site plan diverting truck traffic from Figueroa to Rosecrans, the proposed project will not result in increased levels of noise in the existing residential neighborhood to the west of Figueroa, particularly at night.

Issue Two: *Although the project reduces the size of the previous buildings on site and previous potential number of daily truck trips, there will still remain an air pollution impact to residential uses (homes) on the south side of Rosecrans Avenue between the 110 Harbor freeway and Figueroa Street from the 96 daily truck trips going to the warehouse and exiting from the warehouse to enter the 110 Harbor Freeway.*

Response: As acknowledged in the Board's letter, this project would include the removal of three (3) existing buildings on the site and a reduction in the size of the remaining building. As a result, the amount of daily trips generated by industrial uses on the site will be reduced by approximately 62% from approximately 250 total trips per day, including employee and truck trips, to approximately 96 trips. In addition to significantly reducing the overall number of trips, the project will divert trips from Figueroa Street to Rosecrans Avenue – farther away from the homes in the vicinity – due to the reconfigured site plan.

Since the overall number of daily trips to and from the site will be greatly reduced by this project, and since those reduced trips are more likely to occur farther away from the residential uses in the area, localized air pollution impacts to those residential uses will be reduced by this project.

Issue Three: *Potential traffic impacts of trucks leaving the warehouse and turning west over the eastbound lanes of Rosecrans Blvd. A professional traffic study was not carried out.*

Response: Analysis of the potential traffic impacts of this proposed project was completed in accordance with the County of Los Angeles Traffic Impact Analysis (TIA) Guidelines adopted June 23, 2020 (with update (9/2/2020)). This study addressed the change in the number of trips that will be generated by uses on the site, as discussed above, the change in Vehicle Miles Traveled (VMT), and changes to access and circulation proposed into and out of the site.

The site currently contains three (3) existing driveways on Rosecrans Avenue, each allowing departing trucks to turn westbound or eastbound. As proposed, the project will close two (2) of those existing driveways and will retain and modify the remaining driveway to facilitate safer truck maneuvers into and out of the site. The remaining driveway on Rosecrans is located



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approximately 300 feet east of the curb projection of Figueroa Street. The driveway will be modified to have a 40-foot width to accommodate truck movement, and 10'x10' visibility triangles are proposed between the gate and the Rosecrans property line to increase visibility between trucks leaving the warehouse and vehicles traveling along Rosecrans. In addition, there is an existing two-way left turn lane on Rosecrans Avenue that can safely accommodate truck movement into and out of the project site.

Issue Four: *Lack of air conditioning in the renovated warehouse building. Representatives for Rexford Industries indicated during their presentation to the HGNNC Planning and Land Use Committee on April 25, 2024, that air conditioning was not needed as the site is located in the coastal zone that does not see high temperatures as compared to warehouses located in the Inland Empire, for example, and that ceiling fans would be adequate for overly hot days. However, with the impact of global warming, our neighborhood is seeing many more high 90's and 100 degree temperatures. Ceiling fans alone are unlikely to be able to cool the interior of the warehouse to below 87 degrees, per the recently adopted Cal/OSHA standards for indoor air temperatures. It would seem prudent to plan for the future by installing a heat pump heating/cooling system with solar panels so that the building is ready to provide proper cooling for days of higher temperatures in the future.*

Response: While the property will not be air-conditioned, it is important to note that our renovation plan includes the addition of several significant improvements that improve air circulation and cooling. These include the addition of 60 vented skylights that, when opened, produce an airflow much higher than average, substantially increasing the insulation on the building's roof, and providing the electrical infrastructure for a tenant to add high-velocity fans, as appropriate for their operations.

Finally, we recognize the anomaly the split jurisdiction presents and that your Neighborhood Council was not formally notified when our application was filed. Please note, as we explained in the April meeting, that Rexford independently opted to and proactively reached out to HGNNC in advance of any formal hearings or approvals.

Thank you again for your kind consideration.

Sincerely,

BRIAN GARCIA

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