

EXHIBIT F

DEL AMO ACTION COMMITTEE

FORM 1-SUPPLEMENTAL ENVIRONMENTAL PROJECT PROPOSAL FORM

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SUPPLEMENTAL ENVIRONMENTAL PROJECT PROPOSAL FORM

Project Name: Community Outreach, Education and Planning		
Organization Name: Del Amo Action Committee		
Contact Name: Cynthia Babich		
Mailing Address: P. O. Box 549		
City: Rosamond	State: California	Zip Code: 93560
Street Address (if different from above): 4542 Irone Ave.		
City: Rosamond	State: California	Zip Code: 93560
Telephone Number: 661 256-7144		
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Company Email Address: delamoactioncommittee@gmail.com		

SIGNATURE

I declare that I have examined this statement, and to the best of my knowledge and belief, it is true, correct, and complete.

SEP Submitter Name: Cynthia Babich	Title: Director
Signature of Submitter: <i>Cynthia I Babich</i>	Date of Signature: 9/19/19

FORM 1-SUPPLEMENTAL ENVIRONMENTAL PROJECT PROPOSAL FORM

ORGANIZATION DESCRIPTION

- nonprofit 501(C)(3)
- government
- local agency
- tribal government
- business
- other (if other, please explain):

Provide a brief history of the organization (mission, vision, and goals):

Low income communities of color are targeted for society's most toxic industries and waste dumps. We experience this first hand. We also know that policy changes that promote environmental justice lead to healthier communities. The Del Amo Action Committee defines and implements solutions to environmental health hazards in our community. We hold the needs of underserved communities in the forefront. Everyone deserves a healthy and safe place to live and work.

The Del Amo Action Committee (DAAC) is a grassroots community-based organization formed in 1994 when community residents recognized they were suffering from a wide range of unusual health problems. The community is located directly south of two USEPA Superfund sites. Community health concerns were elevated when community members discovered they were living on top of contamination from a DDT manufacturer. The Montrose Chemical company was located across Normandie Ave. from our community. The company was one of the largest producers of DDT in the country. DDT from the manufacturing operation was dispersed in the community through releases in the air and in storm water runoff. The company closed in 1982. The Del Amo Superfund site is located across Normandie Avenue from Montrose Chemical and borders the community to the north. It is the former location of a synthetic rubber manufacturing facility owned and operated by the US government during World War II and owned by Shell Oil after the war until it closed in 1972. The area where the two sites and the residential neighborhood are located was largely agricultural Before World War II.

Our Community is surrounded by air pollution from many sources, refinery, freeways, industrial facilities, some with permits and some that do not have permits. The USEPA recently did indoor vapor intrusion testing in homes and businesses in our community. While the USEPA has told us the levels of several dangerous chemicals do not present an "urgent" risk, they acknowledge that the testing detected benzene, chloroform and TCE in a number of the homes. It is difficult to understand the implications of this kind of testing. We know that the chemicals found in our homes can impact our health. We know that these chemicals may be in our homes due to the soil and groundwater contamination from the two Superfund sites. Benzene is a known human carcinogen and is the primary contaminant of the Del Amo Superfund site. TCE and chloroform also affect human health and are contaminants in the groundwater.

We want our community members to understand the consequences of air pollution and to participate in the process of making our community a better, healthier place to live.

ORGANIZATION EXPERIENCE

Provide information on the organization's ability and capacity to complete the proposed project. Describe previous project management experience, including a list of completed projects/dates and who funded the project:

DAAC has a proven track record of effectively reaching out to governmental environmental organizations and developing channels effective in two way communication and problem solving. For over twenty years our organization has represented our community in the work being done to remediate the contamination caused by the now closed industrial facilities. While some remediation of the contamination left behind by the closed facilities has been completed, much more work must be done. DAAC has participated in numerous USEPA public meetings and hearings. We've conducted door to door outreach to inform community members regarding the work the USEPA is doing. We've organized community meetings, workgroups and health surveys. We've worked with technical experts in an effort to gain an understanding of the complicated environmental issues we face. Many DAAC's members are long time residents of the Del Amo community; our youth group has been part of our work from the very beginning. We know our work has and will continue to make a difference.

Cynthia Babich has played a major role in organizing a series of fourteen meetings convened by the Los Angeles EJ Network to bring together water organizations responsible for water quality in Los Angeles. The goal of the Groundwater Convening's is to enhanced efforts to protect and preserve groundwater resources in the Los Angeles Basin. The meetings are well attended with representatives from all the water agencies working on water quality and the leaders of environmental organizations. The organizations participating value the discussions and have indicated that channels of communication have been created that didn't exist before the Convening's. We are including comments on the convening's from the evaluation forms.

Recently DAAC working with other LA EJ Network participants organized and participated in an LA EJ Enforcement Conference, this is the third conference of this type organized by the Los Angeles EJ Network. During the conference agency representatives and community leaders presented information relevant to environmental enforcement.

DAAC is also participating in land use planning work underway in Los Angeles County. This work is being done in response to a Los Angeles County Board of Supervisors resolution calling for improved land use in Los Angeles unincorporated areas.

FORM 1-SUPPLEMENTAL ENVIRONMENTAL PROJECT PROPOSAL FORM

PROJECT INFORMATION

Project Name:

Communtiy Outreach, Education and Planning

Organization Name:

Del Amo Action Committee

Project Location(s): Provide the address or GPS coordinates of where the proposed project will take place:

20500 Kenwood Ave. Torrance, California 93560

Torrance Blvd., Normandie Ave., Del Amo Blvd., and Vermont Ave., unincorporated area of Los Angeles County

ENVIRONMENTAL ISSUE TO BE ADDRESSED

Air Monitoring

Indoor Air Filtration

Human Health and Asthma Outreach

Green Projects

Community Engagement and education

Other (if other, please explain):

PROJECT DESCRIPTION

Provide a scope of work for the project and explain how the proposed project will benefit air quality. If applicable, explain how the project benefits disadvantaged communities:

The project presented below is organized in two modules. They are:

Module One) Community Health Fair

Module Two) Environmental and Community Specific Planning Stakeholder Group

Module One: Community Health Fair

The work outlined in this proposal will begin with a Community Health Fair. Over the years one of the most successful community events is the Health Fair. The fair is held on a street in the community bordering the area where a new park is being built. The next fair will be held when in conjunction with the "Grand Opening" event for the park in 2020.

DAAC has organized and held several health fairs. The fairs are a family event with booths providing information on air and water pollution. The booths feature information on multiple health oriented subjects. In the past mobile vans from health agencies have provided basic health screenings include blood pressure check and mammograms. Activities for children are also provided. The health fairs are a traditional event bringing the community together and offer an excellent opportunity for information sharing and communication.

The Air Resources Board and the South Coast Air Quality Management District will be invited to participate in the fair. The County Department of Environmental Health will be invited as will the CAL/EPA drinking water program.

Module Two: Environmental and Community Specific Plan Stakeholder Group

"Nothing will happen to significant change our communities and eliminate the health impacts of living with pollution until changes in land use and the refusal to accept incompatible land use begins to happen." San Deigo Environmental Health Coalition.

Our proposed project will aid in reducing future emissions and will provide training and air pollution awareness to our community members. We will explore the effectiveness of air filters in homes. We will work with the South Coast Air Quality Management District to measure air pollution in our community. We will compare temperatures in areas with and without trees and other vegetation. We will continue to get more information on current land use and land use planning and zoning. We will explore the possibility of putting in more green space in our community. Proposals for green space will be included in our draft community specific plan.

We are working hard to create the first park in our community. This is being accomplished through the Los Angeles Neighborhood Land Trust. Planning for the park has been completed and construction is underway with "Grand Opening" for the park scheduled for 2020.

As we are working to plan our park, a property directly across the street from our community, the former location of a family owned business, Farmer Brother's coffee is being built out as an eleven acre building that will include 176 truck trailer parking spaces. The property is located at 20333 S. Normandie Avenue. This facility will result in additional truck traffic, noise and air pollution in our small community. The construction of this building, taking up all of the former Farmer Brothers property was done without an environmental review because it is located in an industrial zoned area. This is difficult to understand given the fact that there is a residential area along Denker Avenue behind the property.

We have brought together a collaborative stakeholder group (something DAAC has extensive experience in accomplishing) and have begun the out of the box thinking that is needed to bring about positive change. Our area does not have a Community Specific Plan. We will develop a Community Vison of a healthy community that we can use to advocate for an area Specific Plan.

On December 8, 2015 the Los Angeles County Board of Supervisors passed a motion proposed by Supervisors Hilda Solis and Mark Ridley-Thomas on the "Development and Implementation of Equitable Development Tools". The motion calls for a general plan update which will provide a blueprint for growth in the unincorporated areas in the next 20 years.

The Los Angeles City Council voted in March 2017 to back an effort to update community plans. They acknowledge that the city's current planning guidelines don't reflect neighborhood needs. We will engage with new partners as well as with those we have had successful working relationships with over the years in an effort to bring all the stakeholders together so we can begin developing the major elements of the draft Community Specific Plan. We believe timing is right for our work. We don't want to miss this opportunity.

FORM 1-SUPPLEMENTAL ENVIRONMENTAL PROJECT PROPOSAL FORM

PROJECT TIMELINE

Provide a timeline for project implementation. Provide a breakdown of the major milestones required to implement the project, including completion dates:

Project Timeline: To begin first month of SEP award

Month Begin	Work	Month Completed
1st	Complete Current Land Use Maps	3rd
1st	Prepare Presentation/Historic Land Use	3rd
1st	Begin Preparation for Health Fair	12th
1st	Begin Planning for full day meeting	3rd
1st	Engage stakeholder group members	3rd
1st	Continue One on One stakeholder meetings	5th
1st	Continue Research on Royal Blvd. Property	3rd
3rd/4th	Hold first full day Stakeholder meeting	4th
4th	Prepare action items from meeting	4th
Ongoing	Continue Fair preparations	Ongoing
6th	Hold second stakeholder meeting	6th
6th	Present Community Vision Plan	7th
7th	Community Training Forum Planning	8th
7th	Prepare evaluation form for training	7th
8th	Hold Training Forum	8th
8th	Third stakeholder meeting	8th
10th	Hold fourth Stakeholder Meeting	10th
Ongoing	Complete Community Vision Plan	11th
8th	Planning for Second Training Forum	11th
12th	Hold fifth Stakeholder meeting	12th
12th	Prepare action items from meeting	12th
12th	Hold Health Fair Grand Opening Park	12th
12th	Prepare Final Report	12th

Total Estimated Cost:

Community Health Fair \$25,000.00
 Community Specific Plan \$35,000.00

Total Project Request: \$60,000.00

SELECT THE BENEFIT THAT BEST APPLIES TO THE PROPOSED PROJECT

Reduction of exposure to air pollution

Emissions reductions

Air quality violations preventions

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ENVIRONMENTAL BENEFITS

Describe the specific benefits/drawbacks to the environment and/or the community:

We anticipate the outcome of our land use plan will have clear air quality benefits. Our goals for this work include: Emission benefits will be gained through workshops and distribution of information that will expand community knowledge and understanding of the sources of air pollution and steps individuals and communities can take to reduce air pollution. This will be accomplished through information sharing and direct work in our community.

Our Community Specific Plan will provide a road map for further reduction of air pollution through planning for additional mini-parks, landscaping, walking paths etc.

Perhaps a review of the work we are doing now provides a helpful demonstration of what we can accomplish:

- Participation with the Trust for Neighborhood Lands in building the Wishing Tree Park in our community. As mentioned earlier, ground breaking for the park is scheduled to begin in the summer of 2018.
- The preparation of accurate maps showing land uses in our community and zoning information. Also, the use of maps and aerial photos to show changing land uses over time.
- Continuing research on the use of trees and other landscaping in reducing air pollution.
- Information sharing on the results of indoor vapor intrusion work in homes and businesses in our community and assistance in understanding what the data shows.
- Monitoring of two properties where new owners are changing property use and participating in permitting and land use decision making.
- Research on the status of the Amco landfill on Royal Blvd. The large property is currently fenced off and is not being used productively.
- Review of SCAQMD report on filtering systems in schools and improvements in air quality.
- Meetings with elected officials to gain their support for our work.

One significant outcome will be the involvement of the next generation in environmental planning through the participation of our youth group. The project will result in improvement on a business as usual approach which looks at development as if pristine environments surround it. Local agencies will have a greater understanding of the cumulative impacts on environmental justice communities like ours. Opportunities for cleaner businesses to take the place of those that are less compatible. We will see a real gain in improving the health of the people in our community.

Emission Benefits: For projects with a direct emissions benefit, please provide an analysis of the emissions prevention or reduction that result from the proposed SEP, and specify the pollutants addressed by the project.

ITEMIZED BUDGET

Provide a detailed list of expected project expenses; include all items to complete the project and the funding needed for each item. Cost breakdown should include capital, operational, and administrative costs (You may attach documents relating to the project to provide additional information (e.g. project timeline, itemized budget):

	Organizational 2019 Budget	Community Healthfair	Community Specific Plan
Personnel			
Executive Director	\$72,000.00	\$10,000.00	
Youth Outreach Coordinator (75)	\$20,500.00	\$5,500.00	\$25,000.00
Benefits & Taxes (14%)	\$13,000.00		
Consultants/Subcontractors			
Technical Consultants/Subcontractors	\$35,000.00	\$1,500.00	\$1,000.00
Professional Services	\$2,500.00		
Total Personnel	\$143,000.00	\$17,000.00	\$26,000.00
Operating Expenses			
Office Supplies	\$5,500.00	\$500.00	\$1,000.00
Rentals/Meeting Space	\$5,000.00	\$2,500.00	\$2,500.00
Utilities/Telephone	\$3,250.00		
Travel	\$8,500.00	\$650.00	\$2,500.00
Newsletter-Copies	\$3,500.00	\$350.00	\$1,000.00
Equipment Purchase	\$1,380.00		
Postage	\$560.00		
Conference/Meetings	\$2,500.00		
Stipends (10 Volunteers)	\$5,000.00	\$3,500.00	\$2,000.00
Insurance	\$1,500.00	\$500.00	
Business Expenses	\$1,500.00		
Total Operating Expenses	\$38,200.00	\$8,000.00	\$8,000.00
Total Costs	\$182,000.00	\$26,000.00	\$35,000.00

(For amendments to projects in implementation phase, include up-to-date project costs to justify funding amounts.)

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INSTRUCTIONS FOR COMPLETING THIS FORM

Use this form to submit detailed supplemental environmental project (SEP) proposals. Complete this SEP proposal form cover page, and attach the supplementary proposal documents as requested below. Questions may be directed to SEP@arb.ca.gov.

Project proposal submissions shall be directed to either SEP@arb.ca.gov or mailed to:

Air Resources Board
Enforcement Division
ATTN: SEP Program
P.O. Box 2815
Sacramento, CA 95812-2815

PRIVACY STATEMENT

Please note that under the California Public Records Act (Gov. Code, § 6250 et seq.), your submissions, including associated contact information (e.g., your address, phone, email, etc.) become public records and may be released to the public upon request. Personal information will be protected from disclosure as required by law, including under the Information Protection Act (Cal. Civ. Code, § 1798, et seq.). Information that is claimed to be confidential should be submitted as provided in CARB's regulations for submitting confidential data, California Code of Regulations, title 17, section 91011.

Del Amo Action Committee
 Community Outreach, Education and Planning
 Sep Proposal September 19, 2019

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Itemized Budget:


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Montrose and Del Amo Superfund Site

Legend

 Montrose Superfund site

 DEL AMO SUPERFUND SITE

 Van Deene Avenue Elementary School

Google Earth

3000 ft





A Collaborative Partnership

Our Community Specific Vision Plan

This is a project of the Del Amo Action Committee with initial funding provided by the Rose Foundation, Center for Health, Environment and Justice and California Environmental Protection Agency.

This Vision is timely and consistent with the Los Angeles County Board of Supervisors adopted motion of December 8, 2015, for Development and Implementation of Equitable Development Tools. “The objective behind this effort was to identify strategies that could foster implementation of the General Plan in a manner that allows County residents at all income levels to benefit from growth and development, encourages the preservation and production of safe and affordable housing, and reduces neighborhood health disparities (collectively defined as “Equitable Development).” *

*Board of Supervisors, Public Hearing, March 23, 2015.

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Chapter 1: Introduction

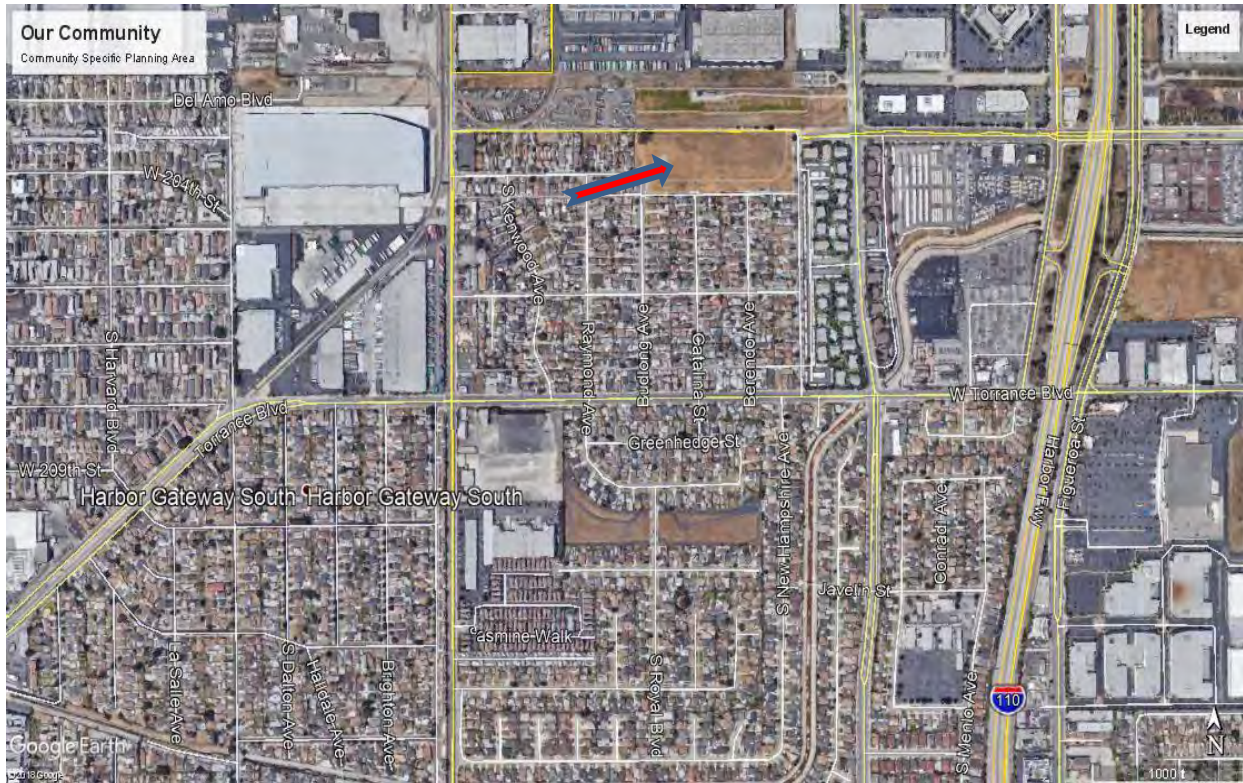
Proposed Community Specific Plan Area for Northern Section West Carson

Area Bounded by: to the North - Del Amo Alley; to the West – Normandie Avenue; to the East - New Hampshire Avenue (Brody Ave.) and to the South – W. Clarion Drive



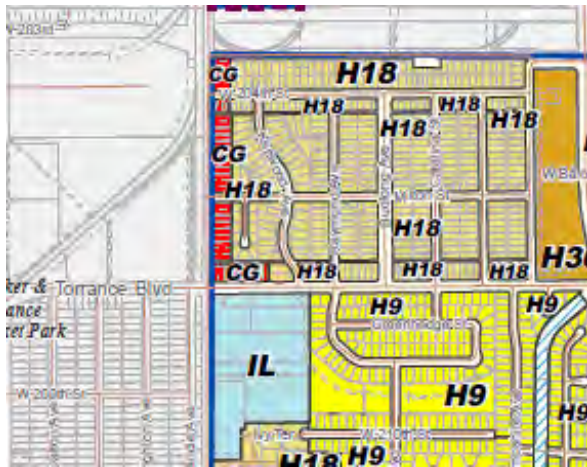


1055 West 204th Street
Torrance, CA 90502
Unincorporated Los Angeles County

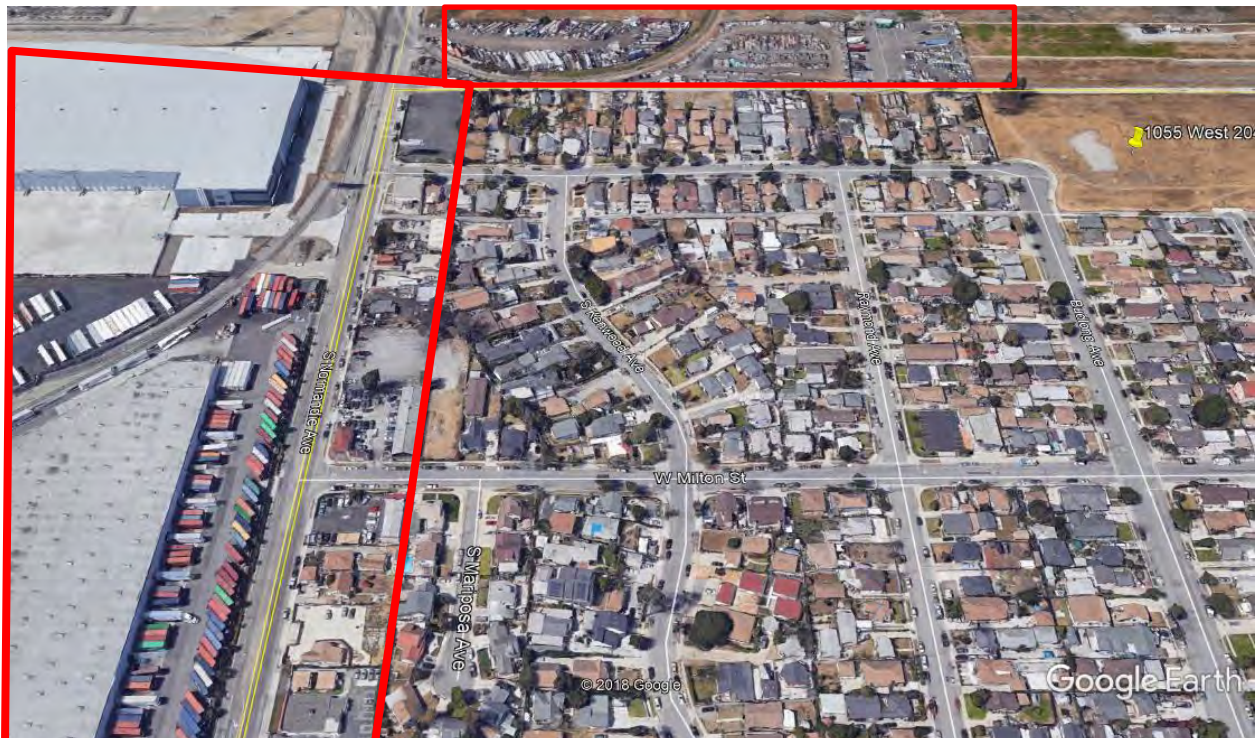


Our Area of Focus

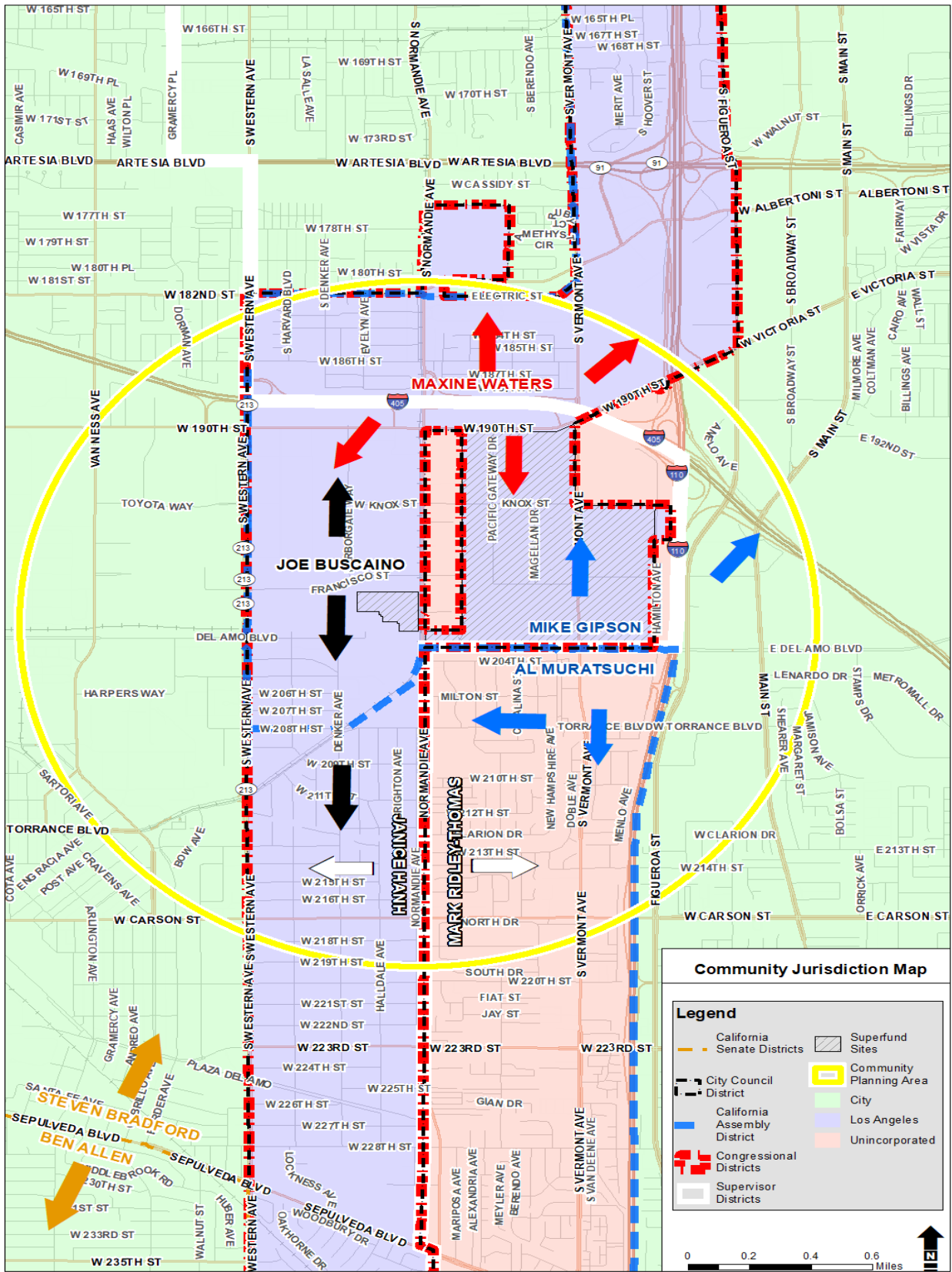
The Del Amo area sits on top of the toxic remains of a World War II industrial complex. We are located in unincorporated Harbor Gateway between the cities of Torrance, West Carson, Gardena and Harbor City. CalEnvrioScreen, a tool used to estimate the pollution burden in communities, ranked our community focus area in the top 20% of most burdened communities in the state. Our focus area has two federal superfund sites (Del Amo and Montrose); one state designated superfund site, Armco Land Reclamation Site (Royal Blvd.); Jones Chemical, a chlorine transfer station; the Torrance/Mobil refinery; Dow Chemical Plastics Manufacturing Plant; 405 and 110 freeways; several landfills; and has several cancer causing chemicals such as benzene, TCE, DDT and others in the air, soil and groundwater beneath our homes.



Current Los Angeles County
General Plan Designation for
Community Specific Planning Area



The Red Zone Mixed Uses vs: Community Health



Political Boundaries: Multi-Jurisdictional Areas

Chapter 2: Creating the Plan



A. Stakeholder Interviews

The Del Amo Action Committee has taken the lead to reach out to a wide swath of partners. Since our area of focus includes both City and County of Los Angeles areas our outreach was two-fold. We conducted one on one interviews during the last quarter of 2017 and the first quarter of 2018. We organized and convened two stakeholder meetings in 2018, on June 26th and November 5th, to educate and understand the state of area planning. We wanted to make sure we would have the participation of outside stakeholders who would work with community members to help us preserve our community and collaborate on ways to correct our incompatible land use planning.

Stakeholder groups represented elected officials including the Los Angeles County Board of Supervisors Janice Hahn and Mark Ridley-Thomas, United States Environmental Protection Agency, California Environmental Protection Agency, California Air Resources Board, Department of Toxic Substances Control, Department of City Planning, County Department of Regional Planning, County Department of Public Health, County Sustainability Office, Californian Safe Schools and Coalition for Clean Air.

B. Existing Conditions Analysis

In 2010 we conducted our first groundtruthing effort. We identified many health hazards.

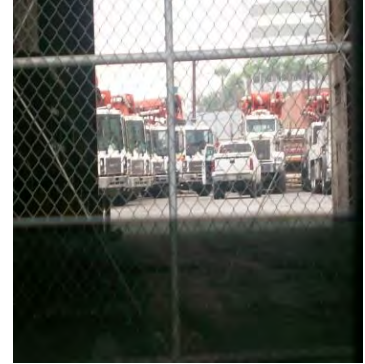


The Whole 2010 DAAC Youth Team



We recently revisited those locations in the fall of 2018 and it seems nothing has changed. The only changes that have been made have not solved the landuse problems they have made them worse. Recently, we have seen an influx of trucks occupying every possible open space and then a recently built giant warehouse (Bridge) right across from our community with another one being planned by the same developer.

Trucks, Trucks, and now more Trucks



**American Poly Styrene
Unincorporated
Los Angeles County
2010 Groundtruthing**



**American Poly Styrene
Unincorporated
Los Angeles County
September 20, 2018 Explosion**

August 10, 2010 we took part in a Toxic Tour for EPA and the then new administrator, Jared Blumenfeld. Many of these youth leaders are over 21 years old now



. Our safe park is under construction this year.

C. Public Workshops

Park Groundbreaking and Healthfair, November 17, 2018





After 16 years of demanding our park be built on an abundance of precaution, Los Angeles County Supervisor Mark Ridley Thomas and Cynthia Babich of the Del Amo Action Committee take in the moment. Wishing Tree Park was achieved by the collaborative efforts of good people.



We presented the 1st draft of our community specific plan and request for core group land use planning members to join us as we develop a health community plan with Wishing Tree Park as our nucleus.

Community Outreach Door to Door

We developed an initial bilingual visioning packet that included areas of concern and our hopes for a successful land use planning effort. We reached out to 450 homes with a contact success rate of 82%. We also presented the same materials used in our door to door effort at a Community Health Fair held on November 10th by the County. Our next round of outreach this summer will include over 400 homes additional homes to the south of Torrance Blvd.



Del Amo Action Committee Staff, Volunteer Coordinators and Youth Leaders work side by side to keep the community informed and engaged in efforts to improve our community.



Outreach teams heading out for an early morning shift.



Community Landuse Core Group

During this outreach we identified and formed a core group of community members committed to working with the larger community and stakeholders to create a vision for our community into the future. We have been working together and meeting on a bi-monthly basis since January 2019. The group has been working hard to learn about planning and begin the initial task of describing the needs of our community and the opportunity to work in collaboration with many stakeholders as we begin creating a healthy neighborhood plan. They have been the master architects of this vision quest.

Identifying the Problem and the Vision: Core Groups Initial Issues Identified

Top Concerns

Industrial and
Residential
Mixed Use
Problems

Chemicals &
Pollution
Trucks &
Warehouses

Homelessness

Population:
Trash
Crime
Traffic

Infrastructure:
Taxes out don't
= Services In
Noise

Health

No healthy
Stores, parks or
walking paths

Better effective
usage of the
ports

Community
Awareness

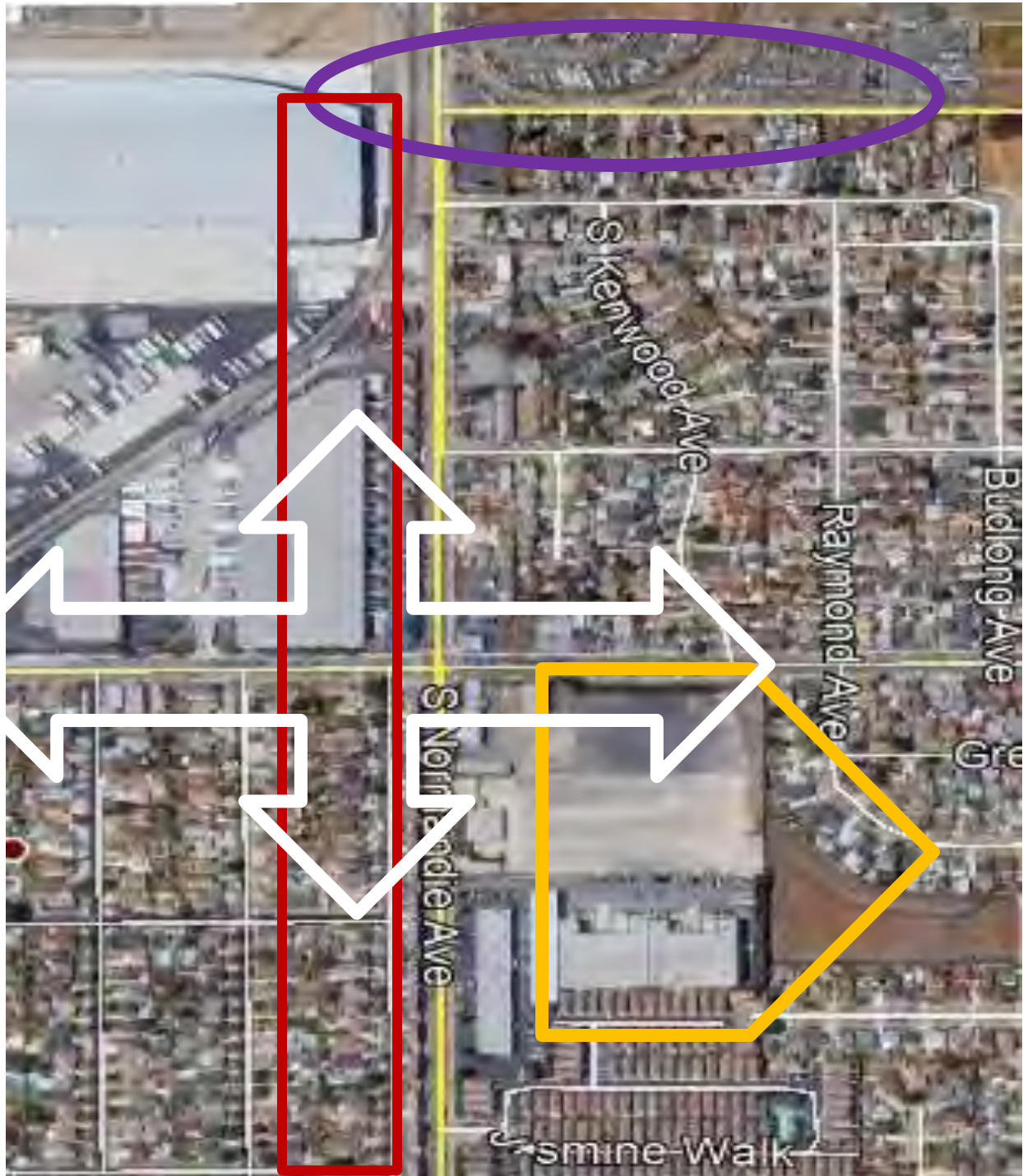
Empty Lots





Lack of
Government
Accountability

Better
Education
Current Boys
and Girls Club
location

We plan to have two workshops in the community as the plan develops to ensure community feedback and input is incorporated into this community visioning effort.

Chapter 3: Existing Conditions



-  Del Amo Alley: overrun by trucks with residents less than 60 feet from their back yards
-  Normandie Avenue: Land use incompatibilities where City and County of Los Angeles Plans meet
-  Torrance Boulevard: Community impacts, Montrose Contamination and Industrial use incompatibilities
-  Normandie Avenue and Torrance Boulevard: Infrastructure is ancient and is unable to handle current Truck Traffic – more proposed warehouses will increase dangerous driving conditions in these neighborhoods.

A. Location

We are located in unincorporated Los Angeles County, a strip between the cities of Torrance, West Carson, Gardena and Harbor City. The area has a history of concentrated chemical and industrial uses and over time as residential demand increased many areas were developed on top of these toxic legacy World War II complexes. The areas close proximity to the 405 and 110 freeways, which include heavy traffic from the Ports of Long Beach and Los Angeles, makes the area attractive for off port warehouses and distribution centers including the increased truck traffic that comes with this type of industry.

B. Demographics

The community population was measured within a 1-mile radius from the corner of Normandie Avenue and 204th Street, Torrance (Post Office mailing address) 90502 as the central point between the former manufacturing facilities of the Del Amo and the Montrose Chemical Superfund Sites.

Summary of information below derived from:

1. American Community Survey 2010-2014 used by EPA draft 12/2018;
2. CalEnviroScreen 3.0 (2018) tract #s 6037543502 and 6037292000;
3. City of Los Angeles Department of City Planning American Community Survey 2010-2014;
4. Los Angeles County General Plan 2035 (2015).

Population, Income and other demographics:

Three distinct neighborhoods identified within the 1-mile radius:

1. Denker Neighborhood (Montrose):

- Part of Los Angeles City known as “Harbor Gateway” aka “the L.A. Strip” that reaches the Port of San Pedro.
- Dense population crammed into apartment buildings.
- Poverty, high unemployment, minority, linguistically isolated, less than high school education.
- 60% Hispanic even split White, Asian and African American.
- Adjacent to EPA Montrose Superfund Site.
- 99% Pollution Burden especially *cleanups* and *hazardous waste*.
- High asthma and low birthrate.
- Local Hispanic gang 204th Street.

2. Kenwood Neighborhood (Del Amo):

- Part of Unincorporated Los Angeles County District 2.
- Over 50% home ownership in single family or duplexes.
- Moderate income, moderate unemployment, minority, linguistically isolated, less than high school education.
- 50% Hispanic, rest split Asian and White. Very few African Americans.
- Adjacent to EPA Montrose and Del Amo Superfund Sites.
- 96% Pollution Burden especially *cleanups* and *solid waste*.
- Asthma and low birthrate an issue.
- Local Hispanic gang *Tortilla Flats*.

3. South of Torrance Blvd. Neighborhood:

- Part of Unincorporated Los Angeles County District 2.
- Over 70% home ownership in single family homes.
- Higher income, older, fewer young children, better educated.
- Affected by EPA Montrose and Del Amo Superfund Sites.
- 96% Pollution Burden especially *cleanups* and *solid waste*.
- Asthma and low birthrate an issue.
- Even split between Asian, Hispanic and White, some Pacific Islanders.
- Linguistic isolation Spanish, Asian, Pacific Islander.

REFERENCES:

Los Angeles County General Plan 2035 (2015)

Note: Applies only to Unincorporated County areas.

<http://planning.lacounty.gov/generalplan/generalplan>

South Bay Planning Area

Parks and Recreation Element (Chapter 10, pp. 172-187).

- Goal is 4 acres per 1000 residents (Table 10.4, year 2010, p.181)
- Population 69,612
- 26 acres *Local Parks*:
 - *Community* 10-20 acres, within 2 mile radius,
 - *Neighborhood* 3-10 acres, ½ mile radius,
 - *Pocket* less than 3 acres, ¼ mile radius.
- 2/3rds children live more than ¼ mile to open space – See Neighborhood and Pocket Park Radius (Figure 10.3) http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_10-3_Neighborhood_and_Pocket_Park_Service_Radius.pdf
- County Parks and Recreation Master Plan (Chapter 16, pp. 268-271)

City of Los Angeles Department of City Planning (1995)

<https://planning.lacity.org/complan/pdf/harcptxt.pdf>

The Harbor Gateway Community Plan of 1995 applies to the area located in south Los Angeles, south of 120th Street and north of Sepulveda Boulevard, surrounded by the communities of Southeast Los Angeles, Wilmington-Harbor City, and the Cities of Gardena, Torrance and Carson.

Harbor Gateway Demographic Profile (2014)

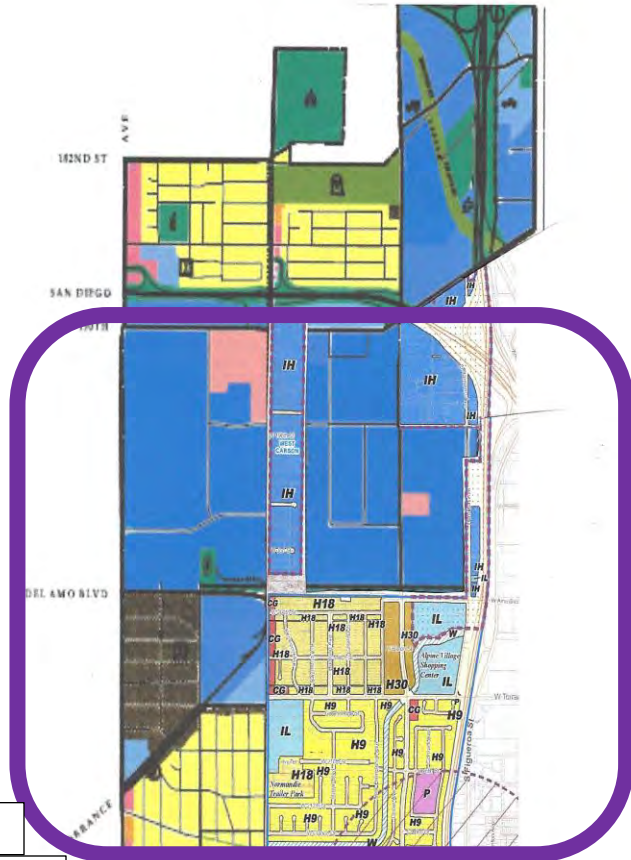
https://planning.lacity.org/complan/CPA_DemographicProfile/2014_HARBOR_GATEWAY.pdf

C. Existing Land Use

County of Los Angeles

LEGEND

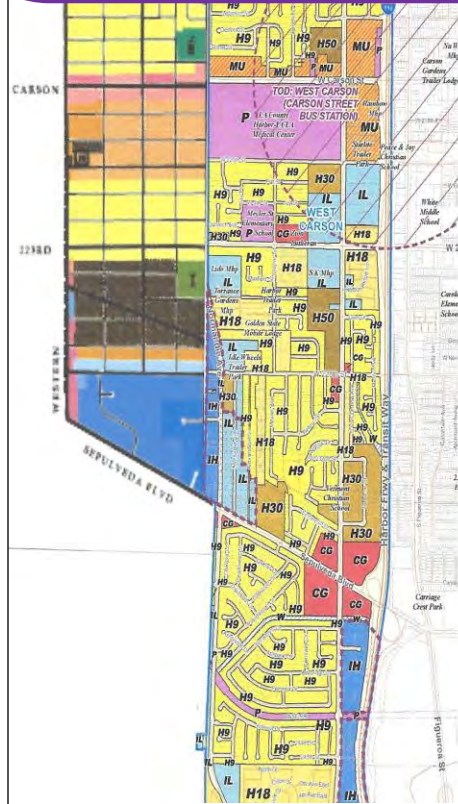
- RL1 - Rural Land 1
- RL2 - Rural Land 2
- RL5 - Rural Land 5
- RL10 - Rural Land 10
- RL20 - Rural Land 20
- RL40 - Rural Land 40
- H2 - Residential 2
- H5 - Residential 5
- H9 - Residential 9
- H18 - Residential 18
- H30 - Residential 30
- H50 - Residential 50
- H100 - Residential 100
- H150 - Residential 150
- CR - Rural Commercial
- CG - General Commercial
- CM - Major Commercial
- MU-R - Mixed Use - Rural
- MU - Mixed Use
- IL - Light Industrial
- IH - Heavy Industrial
- IO - Industrial Office
- P - Public and Semi-Public
- OS-BLM - Bureau of Land Management
- OS-C - Conservation
- OS-PR - Parks and Recreation
- OS-NF - National Forest
- W - Water
- MR - Mineral Resources
- ML - Military Land



City of Los Angeles

LAND USE

RESIDENTIAL		CORRESPONDING ZONES ⁴	CORRESPONDING ZONES ⁵
SINGLE FAMILY			
LOW	BEAR LEAF	LOW MEDIUM DENSITY	RESURB200
		LOW MEDIUM DENSITY	RESURB150
		MEDIUM DENSITY	RESURB100
COMMERCIAL			
NEIGHBORHOOD ORIENTED	COMMERCIAL	COMMERCIAL MANUFACTURING	CMF
HIGHWAY ORIENTED	COMMERCIAL	LIMITED	MLMBU1
		LIGHT	MLMBU2
		HEAVY	MLP
INDUSTRIAL			
OPEN SPACE, PUBLIC FACILITIES			
		OPEN SPACE	OSA1
		PUBLIC FACILITIES	PF



Residential

The majority of residential units are single family homes. However, the character of the area is reflective of a mix of residential densities. Higher density buildings are most often located in the Denker Street (Montrose) community. Many of the higher-density units are aged and in need of repairs or rehabilitation. Residential properties are small and there is evidence of overcrowding, due in part to conversion of garages into living quarters, other makeshift housing and the high number of persons per household. Generally, the higher density properties lack landscaping and are in greater need of aesthetic maintenance and structural repair.



Commercial

The commercial areas are a mix of restaurants, automobile-oriented shops and other retail and office uses. The commercial areas are economically viable, but the physical condition and appearance reflects the need for repair and reinvestment. Commercial businesses are located along our major streets of Normandie and Torrance Blvd. and are well patronized. There are some vacant buildings and sites that offer potential for further commercial growth and development.



Industrial

The industrial areas are primarily clustered along the boundaries of the community on the major thoroughfares of Normandie Avenue, Vermont Avenue, Torrance Blvd and Denker Avenue. Uses range from outside storage to manufacturing and warehouses to auto-related uses with structures and sites being in generally fair condition. The industrial areas are not maintained and do not comply with current development standards. The area includes an Industrial Flex Zone, noting the area is in transition. We see this as a positive and an opportunity to create a more compatible land use with the surrounding residential areas.



Schools and Community Facilities

This section describes the schools and other community facilities located in our community specific planning focus area.

Schools

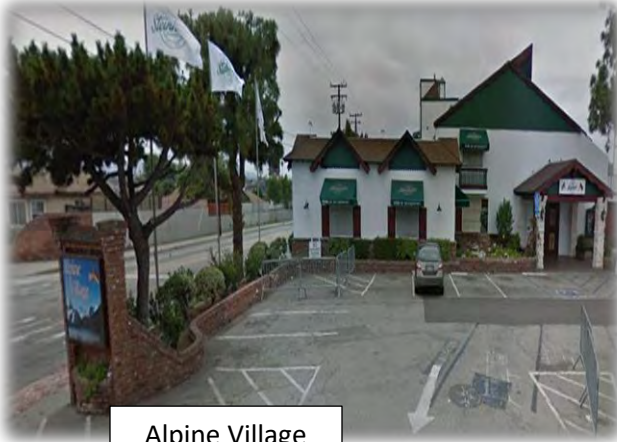
School-aged children in our community planning area may attend the following schools:

- Steven White Middle School 22102 S Figueroa St, Carson, CA 90745
- Fleming Jr. High School 25425 Walnut St, Lomita, CA 90717
- Carson High School 22328 S Main St, Carson, CA 90745
- Narbonne High School 24300 S Western Ave, Harbor City, CA 90710
- Van Deene Elementary School 826 Javelin St, Torrance, CA 9050



Other Community Facilities

- Alpine Village 801 Torrance Blvd, Torrance, CA 90502
- Harbor UCLA Hospital 1000 W Carson St, Torrance, CA 90509
- Boys N Girls Club 1435 Del Amo Blvd. Torrance 90501



Alpine Village



Harbor UCLA
Hospital



Harbor Gateway Boys N Girls Club

Parks

Parks are a tangible reflection of the quality of life in a community. According to the National Recreation and Parks Association, parks bring economic value to a community by raising local property values. The presence of parks also provides environment and health benefits, including improved water and air quality and an increased the likelihood that members of a community will exercise. Socially, parks serve as a gathering place for people and families of all ages and income brackets to enjoy.

According to the County Department of Parks and Recreation, Los Angeles has a median of 3.3 acres of park space per 1,000 people, well below the median of 6.8 acres per 1,000 people in other high-density U.S. cities. Across the county, 41 of the 262 neighborhoods have less than 1 acre of park space per 1,000 people. *

*Source: KCET Los Angeles is short on Parks, Ranking 74th Out of 100 Cities, Neighborhood Data for Social Change April 9, 2018



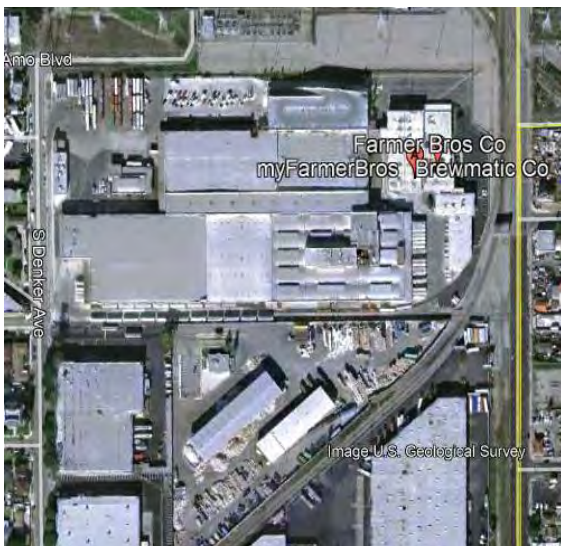
Grand Opening Spring 2020



Focus Areas: Selections

We selected these particular areas based on site conditions, legacy contamination and land use incompatibilities both in the City and County of Los Angeles jurisdictions. These areas are currently being targeted by brownfields developers with the intent to take advantage of the sites conditions, lack of jurisdictional overlap (compatibility with surrounding land use planning) and the land use designations currently being updated. Many of these sites are being developed in the City of Los Angeles areas “by right” which allows for less planning review if the business being proposed is similar in description to the previous land uses. As an example, the Farmers Bros/Bridge site # was a modest single story coffee roasting, trucking and warehouse operation going back to the 1950’s. This property was purchased in 2015 and developed “by right” with no community or near neighbor input into the final use or design. Because it was being developed into a 167 truck bay trucking and warehouse business it did not need to be reviewed in light of area residential changes are general plan visions. This is a bad policy that needs to be changed, parcels like this need to be flagged and require appropriate review. This development has now locked this area into increased diesel emissions and truck traffic for at least the next half a century.

The ‘by right’ process must be overhauled or halted all together.



Farmers Bros. October 2016

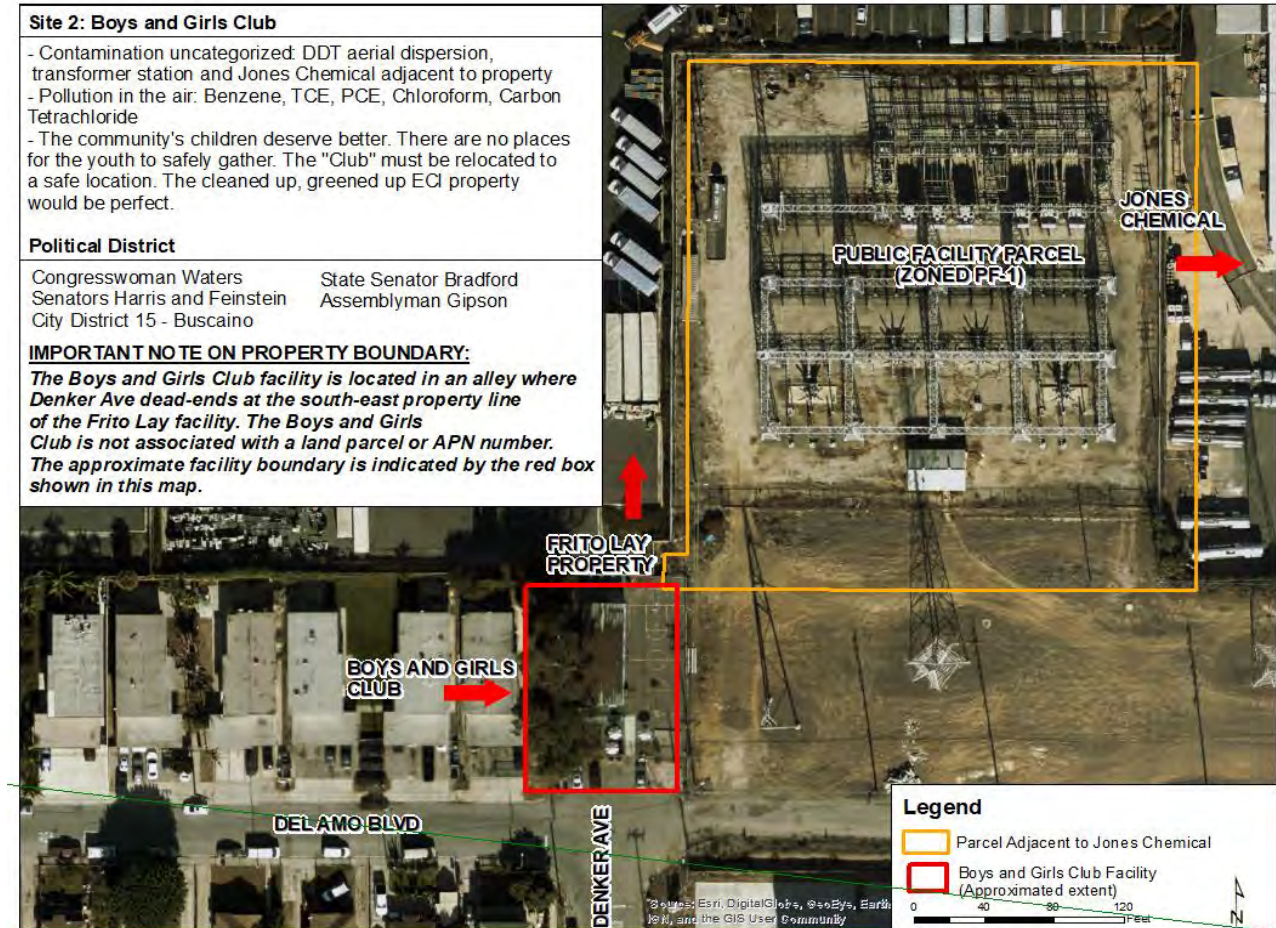


Bridge March 2018



Focus Areas: Short Histories

#2 Cheryl Green Boys and Girls Club 1435 Del Amo Blvd. Torrance 90501



The club is located at the Western boarder of the Los Angeles Department of Water and Power Right-of-Way and adjacent to Jones Chemical, a legacy chlorine transfer station. The whole area has been completely underserved for decades: lacking in places for educational or recreational opportunities. Our area is plagued by horrible gangs and territory disputes are met with deadly force including community bystanders caught in the crossfire. Cheryl Green was such a victim. Neighborhoods should not be the collateral damage to poor planning vision. The Club should be embraced as an important community asset and relocated to focus area #6; once it is rezoned and remediated of the contaminants that entered the property via the “Historical Stormwater Pathway” from Montrose Chemical. We need to protect all the resources we have but we cannot turn a blind eye when spaces for our children are carelessly placed in toxic locations. In this case on un-remediated land adjacent to facilities like Jones Chemical that have a “worst case scenario” of a chlorine gas release that would completely suffocate any living thing in the cloud of gas that would be carried in the direction of the prevailing wind. Since our work began on this vision plan we understand the response to our inquiries about the safety of this club has been to defund it, once again leaving the area void of resources community members can access. When residents must travel outside their service areas for children’s afterschool educational programs or recreational activities their acceptance into programs are determined if there is any room left over and often at a higher cost.

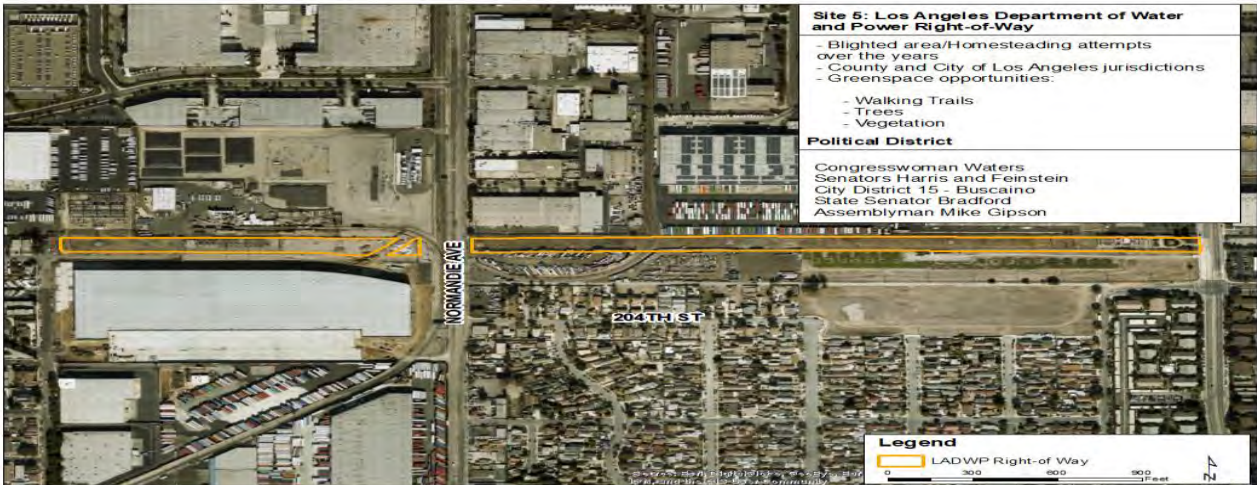
#4 Prologis 20502 Denker Ave. Torrance 90501



When we started this visioning process in October 2017, focus area #4 was a Smurfit paper recycling facility and had been for the past two decades; then one day it was gone and Prologis Trucking had taken over. Then several months later the International Distribution Trucking business (next door) on the corner of Normandie and Torrance Blvd., was bought by Prologis – connecting the two properties and creating one large trucking facility. Prologis has also made a huge investment further West on Del Amo Blvd. at the intersection of Van Ness Ave. in Torrance. We would hope that when Del Amo Blvd. is widened in the area running next to our community there is a transparent and inclusive process with the neighbors who will be greatly impacted by the enormous increase in diesel emissions and traffic.

Transparency has not happened in the past.

**#5 Los Angeles Department of Water and Power Right-of-Way 90501 & 90502
(Located between Denker Ave. and Vermont Ave.)**



This focus area is significantly blighted. Greening it up would benefit nearby neighborhoods and businesses and could include walking trails, dog parks and educational opportunities. This area and the two areas that border the Dominguez Channel, between Vermont Ave. and 110 freeways would benefit greatly from similar amenities and should be the responsibility of the land owner.

#6 Bridge Development/Ecology Controls 20846 Normandie Ave. Torrance 90502



This location has been a thorn in the side of the community for decades. For more than 25 years it was operated as a hazardous waste transfer station by Ecology Controls Industries, who during that time had questionable handling practices. Prior to this company the location was a chemical storage facility that during its operation in the 50's had one particular incident that caused a 10,000 gallon tank full of toluene to leak out overnight requiring remediation measures to be taken.

In 2015, an interested buyer, Warmington Residential, had plans to put new townhomes on this site. Concerns were raised about the characterization of the contaminants onsite and lack of transparency on the portion of the site under Superfund Authority. Then the Warmington proposal, and now the current Bridge proposal, is to build another warehouse in the area (this one with 21 truck bays).

This project seeks to bypass the very clear clean-up process laid out in statute under the Superfund Amendments and Reauthorization Act (SARA) of 1986. We have attached our most recent letter to EPA, dated June 14, 2018, stating our concerns in Appendix A. Their response: EPA is not ready to remediate this piece of the Montrose Superfund site; it is not a priority for them. Furthermore, they stated that the proposed warehouse would not interfere with their future site work. Of course not, because their plan is to continue to cap the waste in place for future generations to deal with. The longer cleanup is postponed the better for the polluters, money in their pockets. In their efforts to prolong all clean up attempts the responsible parties spend most of their time in court suing EPA. Their goal is to do as little as possible to clean up the TOXIC MESS they made.

The United States Environmental Protection Agency issued a perspective purchasers agreement to Bridge Development for this site. On June 14, 2018 the Del Amo Action Committee sent a letter to the US EPA stating concerns about the current cleanup process. They appear to be violating established guidance in the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and the property seems to be on a development fast track bypassing much of the community involvement process. The full letter can be found in the Appendix A.

The neighborhoods adjacent to this site have been under siege from trucks coming and going and banging around for more than two decades. The proposed warehouse would continue the long standing incompatible use of this property. **It is time for change.** This is a legacy toxic site that the community has been engaged with and often leading the discussion about its cleanup for too many generations already. Those impacted by the development of this site are being shut out of the process. Their viewpoint is the only chance to reverse incompatible land use decisions. If no change is made and we continue on the current path our community will forever remain poisoned and our problematic health conditions like Asthma will get so much worse.

This property is in an “Industrial Flex Zone” and has been identified as an area in transition by the County in its General Plan. This property is also in an “Opportunity Zone”. We hope this creates the opportunity that will lead to changes being made to enhance the health and well-being of the surrounding historical housing stock and multi-generational families.

#7 Royal Blvd Land Reclamation Site 20950 South Royal Blvd., Torrance 90502



This is an important property in our community vision; this focus area is actually cutting a neighborhood off from neighbors to the South. This property is a huge opportunity to create a recreational area with input from adjacent property owners. *Measure A* funding for open space is available. In 1991 the site was designated a State Superfund Site and after some remediation the property remains under oversight of the Cal Recycle branch of the California Environmental Protection Agency, which raises considerable questions about what contamination may be there. There is a need to understand any characterization that has already occurred so we can then begin to fill in data gaps. This lot is also a part of the “Historical Stormwater Pathway” and needs EPA prioritization, investigation and remediation. This is another legacy toxic site.

Lots adjacent to Del Amo Alley City of Los Angeles Properties

20228 S. Normandie Ave., The APN numbers that apply to this parcel are 7351-034-070, and 7351-034-805. The 7351-034-805 parcel belongs to Southern Pacific Trans Co.

These lots, vacant for decades, with visible staining on the ground where nothing has ever grown seem to suddenly overnight become truck storage, car storage and building material staging areas. The infrastructure of the alley between these areas and the backyards of community homes has been destroyed and fences crushed. One parcel still contains the old, well worn, railroad spur and the other lot once carried railcars full of chemicals for the Del Amo styrene, butadiene and co-polymer that processed synthetic rubber for World War II and is now part of the second Superfund site in our community. A complaint was filed August 3, 2018; email response from City of L. A. in Appendix A





This location is of questionable condition. Community historians report it as a community garage and gas station in the 1940's and do not remember any tank removal. This lot is at the entrance to our community and would be an excellent candidate for a pocket park and a buffer between our residential community and the huge Truck Warehouse recently built by Bridge across the street on the prior Farmers Bros property, there since the 50's, next to Montrose Chemical Superfund site.

D. Land Use Documents

LOS ANGELES COUNTY BOARD OF SUPERVISORS
MOTION BY CHAIR HILDA L. SOLIS AND SUPERVISOR MARK RIDLEY-THOMAS
DECEMBER 8, 2015: Development and Implementation of Equitable Development Tools

On March 23, 2015, the Board of Supervisors (Board) held a public hearing for the General Plan Update, which provided the blueprint for growth in the unincorporated areas in the next 20 years. At the hearing, the Board directed the Director of the Department of Regional Planning (DRP) to consult with experts, community groups, and other stakeholders to evaluate equitable development tools and concepts, and to report back with recommendations. The objective behind this effort was to identify strategies that could foster implementation of the General Plan in a manner that allows County residents at all income levels to benefit from growth and development, encourages the preservation and production of safe and affordable housing, and reduces neighborhood health disparities (collectively defined as "Equitable Development").

In their report back to the Board on June 24, 2015, DRP presented a toolbox of strategies to promote these objectives. The strategies focus on prioritizing policies, actions, and resources to address socio-economic, educational, environmental, and health challenges. The Board should now move forward with the next steps necessary to implement a range of land use programs and policies with the objective of ensuring that new development brings community benefit rather than displacement of existing residents. In addition, the Board should explore potential land use policies that can mitigate public nuisances and health hazards caused by environmental contamination. The motion can be found in Appendix A.

GOVERNOR’S OFFICE OF PLANNING AND RESEARCH

Considerations for General Plans, Area Plans, Community Plans, and Specific Plans

The Governor’s Office of Planning and Research (OPR) gives overall guidance to the land use planning in the state of California. This office lays out what must be considered in general plans and specific plans. A specific plan is a hybrid that can combine policy statements with development regulations (Gov. Code § 65450). It can be used to address the development requirements for a single project such as urban infill or a planned community. As a result, its emphasis is on concrete standards and development criteria. Its text and diagrams will address the planning of necessary infrastructure and facilities, as well as land uses and open space. In addition, it will specify those programs and regulations necessary to finance infrastructure and public works projects. A specific plan may be adopted either by resolution, like a general plan, or by ordinances such as zoning.

Area and community plans are part of the general plan. A specific plan is a tool for implementing the general plan but is not part of the general plan. Such plans refine the policies of the general plan as they apply to a smaller geographic area and are implemented by ordinances and other discretionary actions, such as zoning. The area or community plan process also provides a forum for resolving local conflicts. Large cities and counties where there are a variety of distinct communities or regions commonly use these plans. Guidance excerpts can be found in Appendix A.

ATTORNEY GENERAL XAVIER BECERRA

Letter to City of Los Angeles: Warehouses & Overburdened Communities

In September, 2019, the City of Los Angeles received a letter from Becerra’s office, which rebuked it for the sub-standard job it had done in reviewing the mitigated negative declaration (MND) for the warehouse distribution center proposed for Harbor Gateway North neighborhood, and demanded that it prepare a full EIR under CEQA – “when it may have a significant effect on the environment.”

The State Attorney General’s office pointed out that the area is already exposed to significant pollution burdens from multiple sources, including the I-110 freeway. It is a community of single and multi-family homes, populated predominantly by people of color, linguistic isolation and high asthma rates. It accused the City of downplaying the number of daily truck trips into the community and not analyzing the significant cumulative impact when viewed in connection with the effects of past and current projects that may exceed the SC AQMD’s significant thresholds.

It added that the City had not analyzed the existing diesel pollution generated by proximity to the I-110 freeway and noted that City’s attempts to address inadequate mitigation of the project’s impacts were unenforceable, such as efforts to limit the daily number of trucks allowed. Another major issue raised was that the public did not have the opportunity to review or comment on these added conditions.

California State Attorney General, Xavier Becerra, formed a new Bureau of Environmental Justice in early 2018 dedicated to protecting communities that endure a disproportionate share of environmental pollution and public health hazards. At CSU Dominguez Hills in February 2019, Becerra remarked that these communities tend to be comprised primarily of low-income and minority families. Full letter can be found in Appendix A.

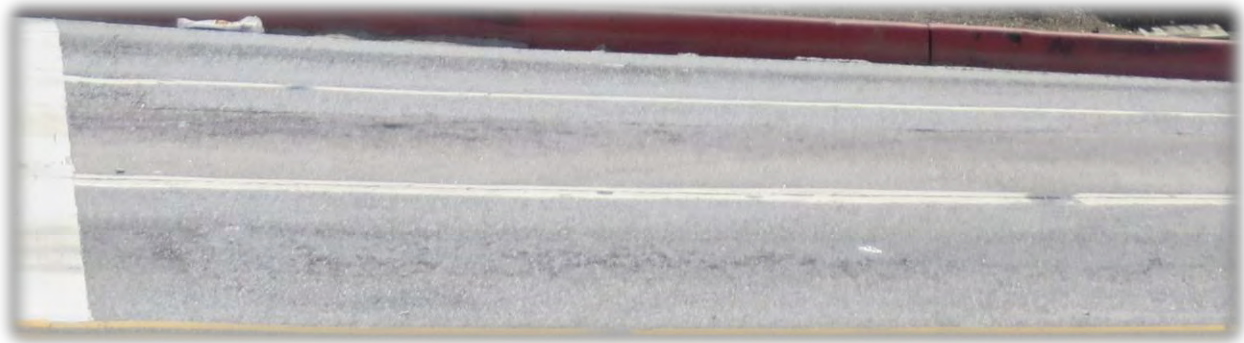
E. Transportation

This section describes the existing conditions of the transportation system in Our Community Focus Area, including the roadway system, public transit, bicycle and pedestrian facilities and transportation-behavior.

Our community is adjacent to three major freeways, 110, 405 and the 91. We are located in the unincorporated Los Angeles County Strip a major artery to the Port of Los Angeles which makes us a magnet for off port impacts. We are in what is referred to as a “Diesel Death Zone”. See article Los Angeles Times by Tony Barboza located in Appendix C.

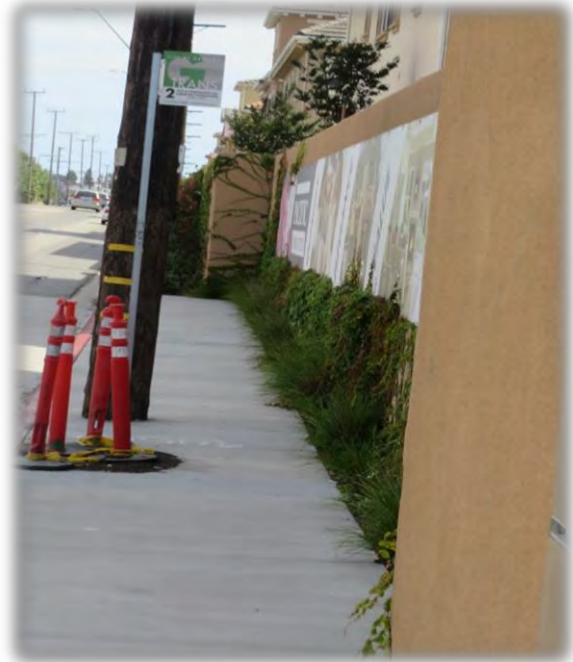
Roadway System

Our roads seem to be using the original infrastructure plan from the 1930’s. Normandie Avenue, Vermont Avenue and Torrance Boulevard are existing major highways. Normandie Avenue is falling apart piece by piece and increasing truck traffic is ruining the streets. Lack of updated infrastructure creates a very dangerous situation when making a left on Torrance Boulevard; the driver cannot see opposing traffic. The Del Amo Alley boards our community to the North and is slated for a four lane highway in the future. We envision “Green Street Concepts” incorporated into the Northern border of our community creating a buffer zone between the industrial zone, enlarged Del Amo Highway and residential neighborhoods.



Public Transit

The Torrance Transit and Gardena Transit Systems service our community. There is a lack of buses running during high use times. A major deterrent to using public transportation is the lack of sidewalks, bus benches or any safe place to wait for the bus. No handicap access!!

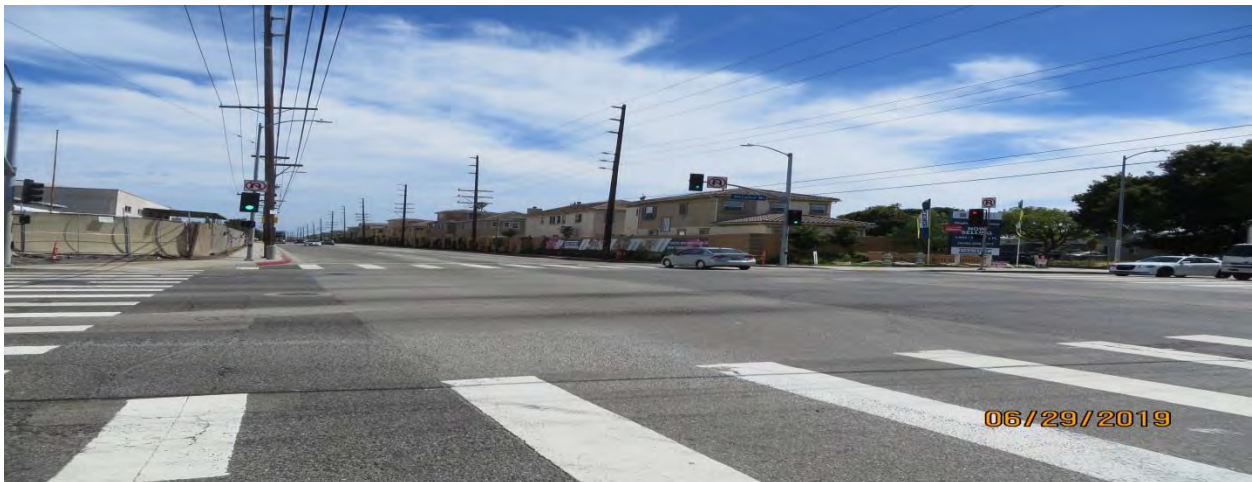


Pedestrian Facilities

There is a complete lack of sidewalks.

There is a complete lack of crosswalks.

There are a considerable amount of blind spots along roads making crossing streets safely almost impossible.



Bicycle Facilities

There are no existing bicycle facilities.

Truck traffic makes bicycle use hazardous.

We envision updated infrastructure to include separated bike lines for optimal safety.

Car Ownership

There seems to be multiple cars per household creating lack of street parking. The housing density requires more parking. Charging stations for electrical vehicles is nonexistent. The air quality in our community focus area would greatly improve with more eclectic vehicles and easy to access charging stations.



Travel Time to Work

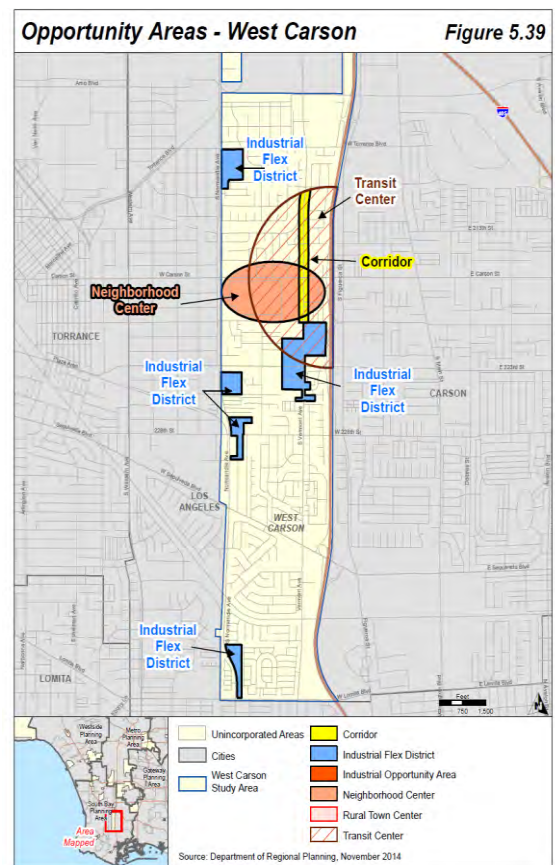
Our community focus area is very close in proximity to several freeways allowing for less time on the road.

Commute Mode Share

We have close access to the Metro Green Line just to the South of the community focus area on 182nd Street off of Vermont Avenue.

Chapter 4:

Challenges and Opportunities



Challenges and Opportunities

The following is a brief summary of the issues and weaknesses present in Community Focus Area. The list below was derived from a number of sources including the existing conditions analysis (presented above), stakeholder interviews, public workshops, discussions with County staff and the observations of the community core group. This is not a comprehensive list and is meant to set the stage for the vision and actions presented in Our Community Specific Vision Plan.

A: Land use and Urban Design

There are three distinct neighborhoods identified within the 1-mile radius

1 Denker Neighborhood (Montrose):	2 Kenwood Neighborhood (Del Amo):	3 South of Torrance Blvd. Neighborhood:
<p>Part of Los Angeles City known as “Harbor Gateway” aka “the L.A. Strip” that reaches the Port of San Pedro.</p> <p>Dense population crammed into apartment buildings.</p> <p>Adjacent to EPA Montrose Superfund Site.</p> <p>Recent influx of warehouses</p>	<p>Part of Unincorporated Los Angeles County District 2.</p> <p>Over 50% home ownership in single family or duplexes.</p> <p>Adjacent to EPA Montrose and Del Amo Superfund Sites.</p> <p>Recent influx of warehouses</p>	<p>Part of Unincorporated Los Angeles County District 2.</p> <p>Over 70% home ownership in single family homes.</p> <p>Affected by EPA Montrose & Del Amo Superfund Sites.</p> <p>Recent influx of warehouses</p>

Overcrowding

Over the years, the population has expanded at a faster rate than the number of housing units and housing costs have increased. As a result, many of the residential areas are overcrowded. Many homes are multigenerational families leading to lack of parking for the residents.

Incompatible land uses

There are land use conflicts between residential and industrial use in parts of the community, especially at the southeast corner of Torrance Boulevard and Normandie Avenue, ECI/Bridge II, embedded in our residential community.

Normandie Avenue and Torrance Boulevard Commercial Areas

These areas have tremendous potential to be an asset to the surrounding communities but need significant improvement. Many existing buildings are in need of repair, there are vacant and underutilized parcels, some uses turn their back on the street and create an unattractive pedestrian experience, and there is a lack of public parking and enforcement.

Home and Building Repairs

Many of the buildings in our community need of improvement. Some are vacant or abandoned, yards and fences have not been maintained and buildings need physical improvements such as painting.

Inconsistent Neighborhood Character

While the residential neighborhoods were designed for single-family homes, the current zoning allows multi-family housing in most areas. The result is that most neighborhoods have an inconsistent urban fabric with apartment buildings located on small lots and near single-family homes. This results in an inconsistent and, at times, unattractive neighborhood character.

B. Transportation

Bus stops lack basic amenities

Our focus area has bus transit service however a majority of the bus stops lack the basic amenities such as benches, shelters, trash cans and transit information. Sidewalks and crosswalks need improvement or in many areas are non-existent. We are in great need of a good pedestrian network but the sidewalks in some places are in need of repair and upkeep. In addition, numerous locations do not have visible and safe crosswalks.

Limited bicycle facilities

There are very few bicycle facilities in the community. Cyclists usually ride either in the travel lane or on sidewalks, which is dangerous to pedestrians. Alleys are dangerous and unattractive – Many of the residential areas have alleys that provide secondary access to homes. The alleys are places for illegal dumping, graffiti, stray dogs and crime.

Streets have traffic congestion

There is traffic congestion on Torrance Boulevard and Normandie Avenue at certain times of the day. In particular, the areas around this intersection are congested in the morning and afternoon and major corridors, particularly Torrance Boulevard, Normandie Avenue and Vermont Avenue, are congested during peak commute times.

Lack of parking

There is limited public parking in the community and street parking in residential areas is often overcrowded.

C. Economy and Jobs

Lack of jobs

There are not enough jobs in the community for area residents that do not contribute to air quality problems. Indeed, the working age population greatly outnumbers the jobs in the surrounding areas.

Lack of diversity of jobs

The majority of jobs that do exist are low-wage and low-skill. A greater diversity of jobs is needed.

Lack of commercial diversity

While our community focus area contains two neighborhood supermarkets and a few fast food restaurants, several repair shops, lawnmower service, a pest control company and one or two retail stores, a greater diversity of commercial uses is needed. Residents who want quality food or a nice sit down typically must leave the community.

Limited opportunities for job training and vocational education

More job training, job placement and vocational education services are needed to help our youth and young adults in the community enter the workforce and advance their careers.

D. Public Facilities and Services

Lack of parks and open spaces

With no parks, the community is greatly underserved by parks and open spaces. More green space needed to promote community health and well-being.

Not enough County services!

Residents commented that there are not enough County services available in or near our community. To access some services, residents and businesses must travel to downtown or elsewhere. A one-stop shop for all County services was recommended.

Area is split between two jurisdictions (city and county)

Our community focus area is split between supervisorial district 2 and council district 15. This situation has increased the lack of compatible land use. There needs to be overlapping considerations where jurisdictions end and being to ensure no harm is done to near neighbors.

Additional facilities & services are needed for youth, seniors & the disabled

More youth and senior facilities are needed; there is a lack facilities and open space to handle the growing population. We think a library focused on youth and young adults would greatly benefit the area on many levels.

E. Community Life

Lack of identity

The community lacks a unique identity. Many residents do not even know that they live in the County and, still more do not associate themselves with the community called “Del Amo or Montrose” Many people believe they live in Torrance because that is the post office identify given this area. We think events and meetings with residents to select an identifiable name would be tremendously empowering. We identify with the toxic sites around us.

Few community meeting places

There is no identifiable center of the community where residents can socialize and gather. This lack of a center contributes to the lack of identity in the community.

Lack of entertainment and arts and cultural uses

There are few, if any, entertainment uses in our community focus area. Residents wanted places where adults and especially youth can meet and gather.

F. Health and Safety

High crime rates

The area suffers from high crime rates and gang activity. This has a negative impact on community identity and cohesion. There is a lack of zoning and code enforcement.

Streets have trash

Many of the streets are dirty and littered with trash. This is due to a general lack of respect for the public space and illegal dumping of bulky items, such as mattresses and couches. Regular large and bulky item pick up would be utilized by the community.

Graffiti is prevalent

Graffiti is visible throughout the community; surfaces are tagged, including fences in the community, billboards, vacant buildings, signs and walls.

Significant number of code violations

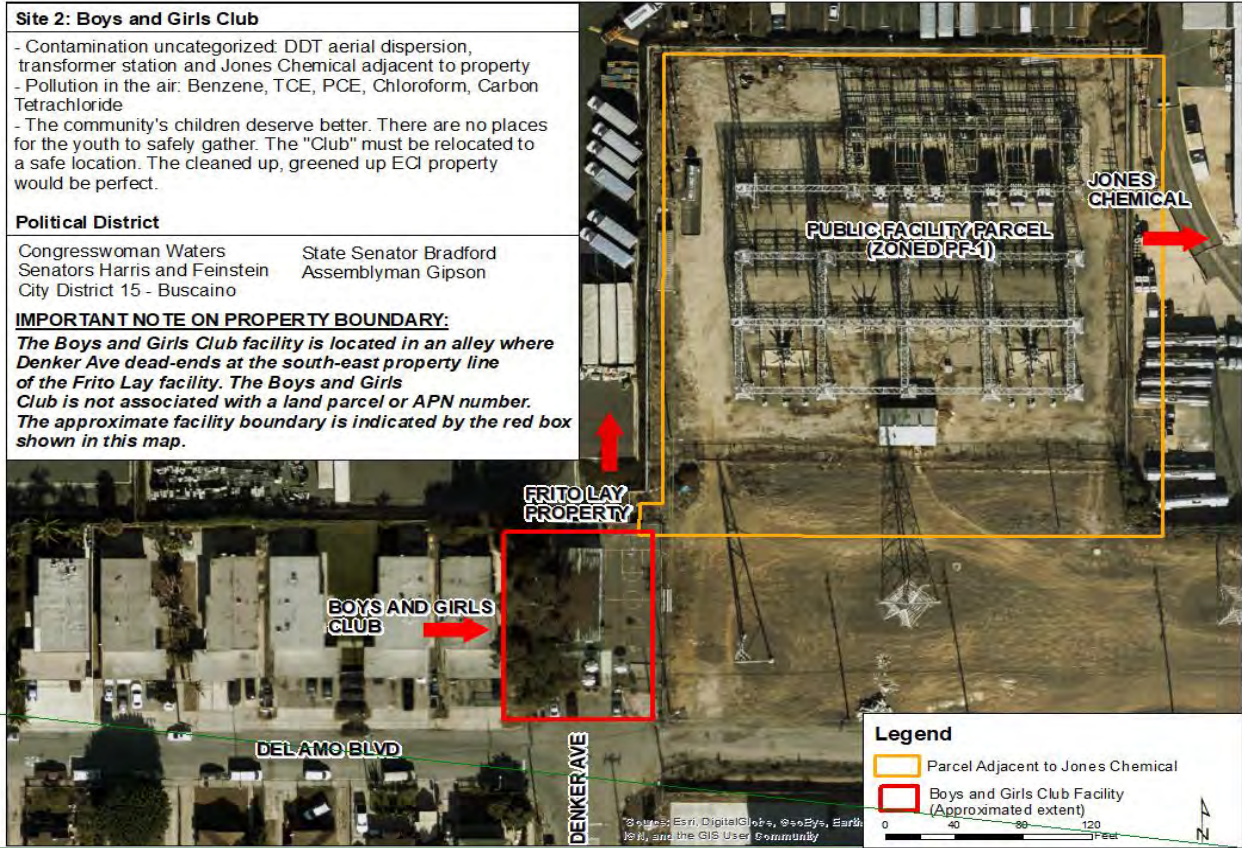
The area suffers from a large number of code violations. In residential areas, illegal units, garage conversions and additions are common. In many public areas illegal activities are occurring making residents afraid to fully enjoy their properties and neighborhood.

Challenges

Correction of Landuse Incompatibilities

Historical Problems with legacy sites, lack of open space and where land use plans collide.

Rachael Green: Boys and Girls Club



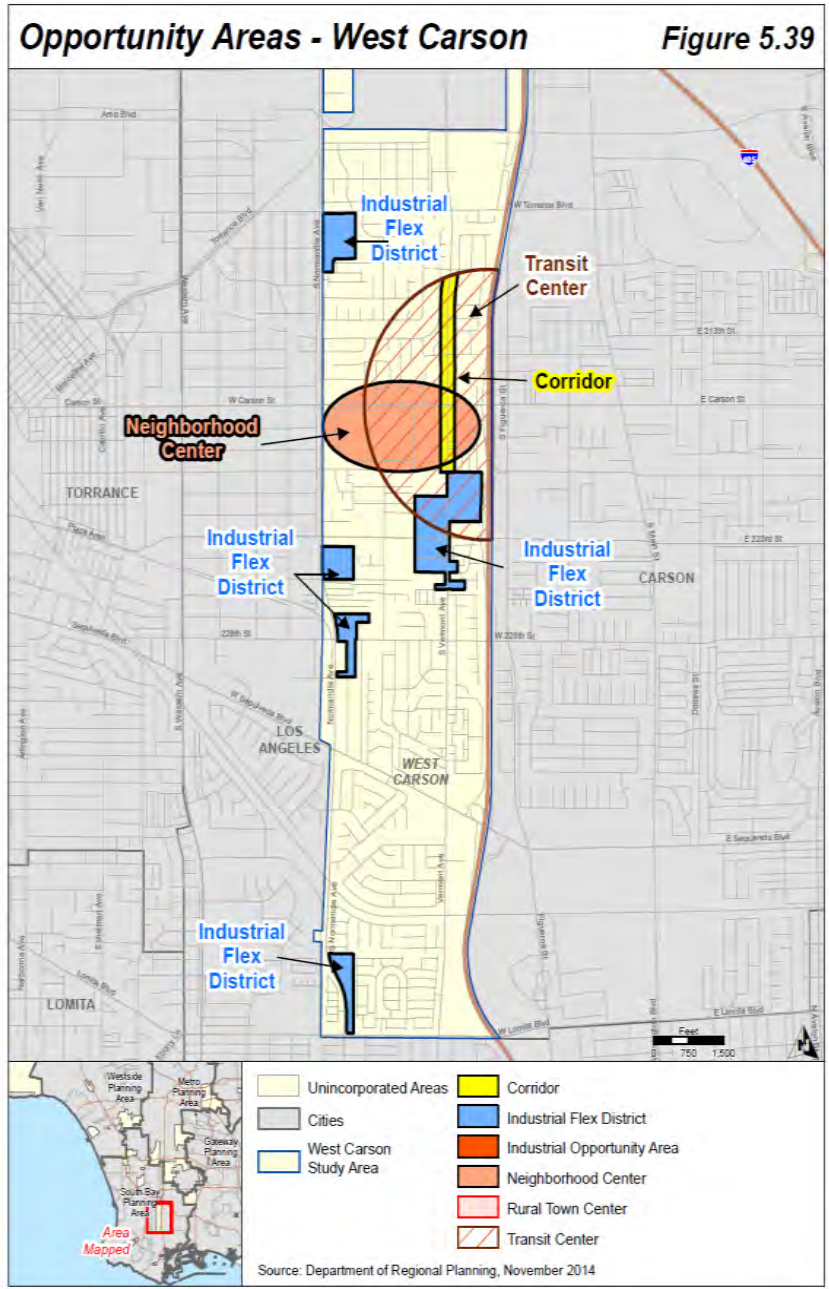
Royal Blvd.: Land Reclamation Site ~ Brownfield



Opportunities

Opportunity Statement

The City of Los Angeles is currently updating the Harbor Gateway Plan which will take into consideration our comments as a nearby community. The City planning area includes most of our toxic legacy sites and currently permitted air pollution facilities. This is a great opportunity to work across jurisdictions and the planners have been very open to our needs and concerns. The County has identified healthy communities as a priority and has entered into a process to balance the revenue an area can produce with the elements needed for healthy Los Angeles communities.



Neighborhood Centers

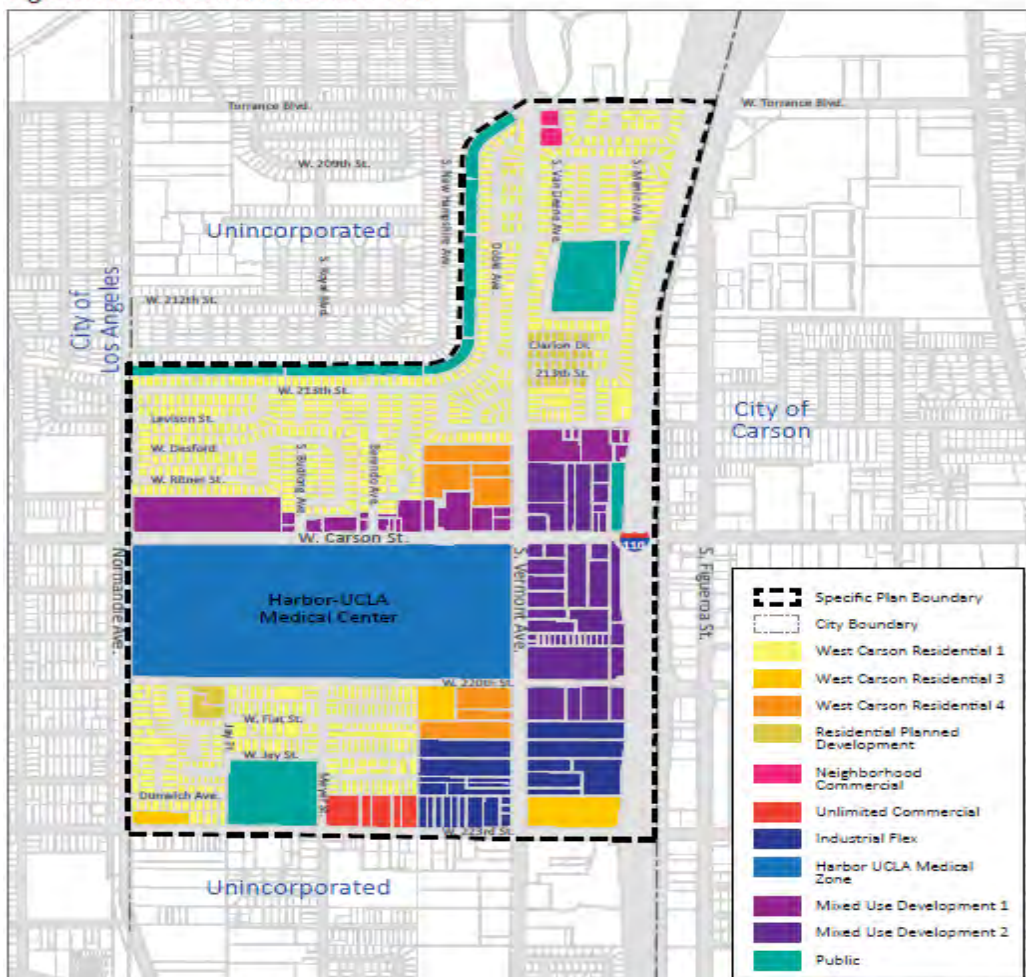
These are areas with opportunities suitable for community-serving uses, including commercial only and mixed-use development that combines housing with retail, service, office and other uses. Neighborhood centers are identified based on opportunities for a mix of uses, including housing and commercial; access to public services and infrastructure; playing a central role within a community; or the potential for increased design, and improvements that promote living streets and active transportation, such as street trees, lighting, and bicycle lanes.

Industrial Flex District

They are Industrial areas that provide opportunities for non-industrial uses and mixed uses, where appropriate, and also light industrial or office/professional uses that are compatible with residential uses.

West Carson Transit Oriented District Specific Plan

Figure 3.1 Land Use Framework Plan



Chapter 5: Community Vision

Our Vision

Identifying who we are – our community

- **We wish to ensure future generations have a healthy place to grow, live and thrive.**
- **Our community is comprised of multi-generational families of all ages, which contributes to a healthy community structure.**
- **We wish to preserve our culture identities.**
- **We wish to preserve the feeling of community that is enhanced by our single family housing residential areas.**



Community Focus Area: Greening Vision

The Need for a Green Vision

There are many current opportunities to increase community greenspace. The health benefits of more open green recreational space in our communities are widely known. Resources have been approved by the tax payers to acquire and build parks. Focus groups have canvassed the county to gain an understanding of where the greatest park needs are. The Los Angeles County area is extremely built out and creating open space requires strategic planning. Identifying industrial areas that are incompatible with the surrounding residential areas and targeting these locations as they become available was a viable idea raised over and over during many of these community based focus groups, as it did in the ones our residents participated in with the Los Angeles Neighborhood Land Trust.

We began this community specific planning process because of the sudden build out and development of trucking facilities and warehouses in historical toxic legacy sites surrounding our community. Sites we hoped would become green space, healthy space and space between our families and the industries embedded in our lives and communities. Instead we see a mass rush by developers to grab all they can before Los Angeles County and City Planning efforts can bring any relief to communities like ours, where land use plans collide.

This planning effort addresses the need to preserve current open space and seize opportunities to correct land uses that are not compatible historical, have been poorly developed or changed over the decades. This is a common sense approach to development that does not currently consider bordering jurisdictions, like in our case with Los Angeles City and Los Angeles Unincorporated County areas. This is a community’s focused effort to create a community specific plan; we believe will lead to a healthier place to live, before it is too late for many who have already suffered with the surrounding incompatibilities for many decades. This is the communities chance to speak out for what they envision for their neighborhood going forward.

Chapter 6: Priority Actions

The Core group prioritized Community Actions

Mandatory Needs:

Improve Quality of Life

Relocate Boys and Girls Club

Parks/Community Center

Walking Paths

Services (Daycare, after school activities and senior activities (walking groups))

Stores

Peaceful and Quite

Safe Neighborhood No Gangs

No Homelessness

Community Rights and Involvement made a priority

Clean Air to Breath

Ensure Air and Soil is safe

Preserve a sense of community

Research history

Landscaping

Less Traffic (trucks)

Utilized vacant lots to Green Spots

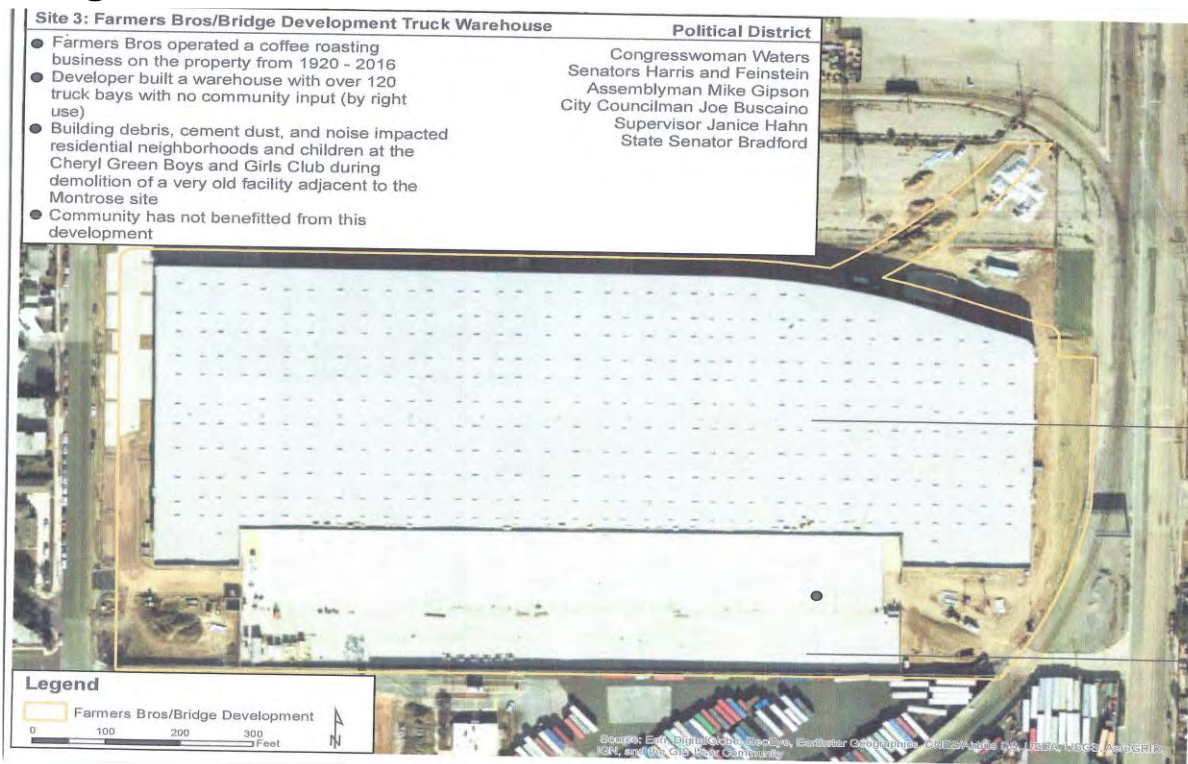
Health Services

Well-paying jobs at businesses that don't add to the pollution burden in the community.

Priority Issues: Air Pollution

Warehouses and Trucks

Bridge: Warehouses



Trucks...Prologis



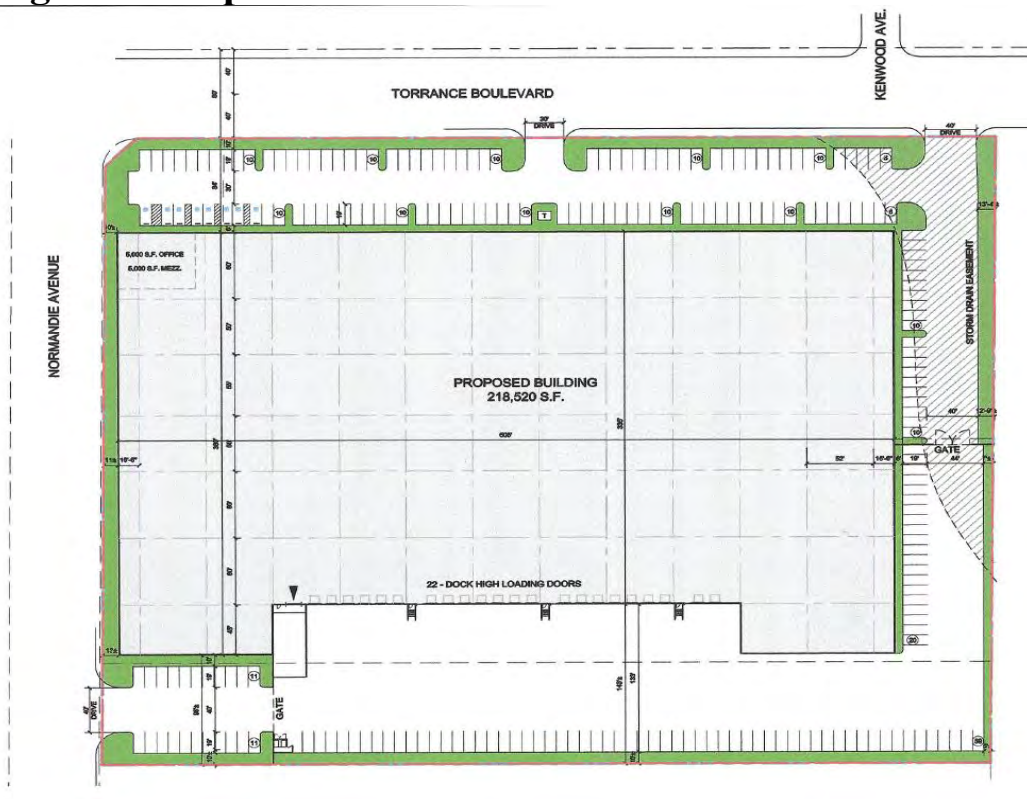
Trucks... Del Amo Alley



More Warehouses and Trucks...ECI/Bridge II



ECI/Bridge II – Proposed Warehouse



Appendices

Appendix A: **Land Use Documents**

From: John Jones <john.w.jones@lacity.org>
To: Martica Velez <mavelez@ph.lacounty.gov>
Cc:
Bcc:

Date: Tue, 7 Aug 2018 23:11:09 +0000

Subject: 20228 S. Normandie Ave.

Hello Martica Velez. On August 3rd, you submitted the following:

This is a complaint sent to you from LA County Public Health, Environmental Health Administration sent via email today August 3, 2018. Your online complaint service requires an address, hence this email. We can provide the City Assessor Parcel Number which is 7351-034-070 and/or 7351-034-805. The description of the location Parcel(s) on the North Side of W. Del Amo Blvd, this falls within the City of Los Angeles. Complaint: ugly swap meet for junk, old building material, plants, cars, trucks. Please provide us with a courtesy reply to the name and email above that this complaint will be processed by your department. Please provide us with any appropriate updates. Thank you.

I received an e-mail requesting investigation on behalf of one of our Neighborhood Prosecutor and a Senior Lead Officer from LAPD for this. Here is my reply:

Hello Lauren and SLO Bravo. This parcel does have an address:
20228 S. Normandie Ave.

The APN numbers that apply to this parcel are 7351-034-070, and 7351-034-805.

The 7351-034-805 parcel belongs to Southern Pacific Trans Co., and reflects the sections of property that now have, and at one time had rail road tracks on it throughout these parcels. The parcels to the East of these are a Superfund site currently under remediation.

The parcels that comprise 20228 S. Normandie Ave./APN 7351-134-070 are lot tied as one parcel.

I visited this site today and took pictures. Upon checking the address in CEIS, I discovered that we have a current VEIP case on this property. Further research revealed a permit from 1990, and a Certificate of Occupancy for "Use of Land - Truck and Container Storage".

In reading through the e-mails, there is an apparent time period this land was empty sometime after 2011, and it was perceived that this was an illegal use when it began to be used again. In ZIMAS, you can see from 2001 through 2011 aerial ortho photographs, this property was used for storage. The 2014 aerial photos show the land unoccupied. I'm not exactly sure when the land ceased to be used, and became used again, but they do have a Certificate of Occupancy to the use as Truck and Container storage, and are currently in the VEIP annual inspection program. I could not determine that any "swap meet" was going on in my inspection today. Under the circumstances, I find no immediate or valid violation.

--

John Jones
Senior Building Inspector
Los Angeles Building and Safety-Code Enforcement
638 S. Beacon St, Rm. 276
San Pedro, CA 90731

June 14, 2018

Environmental Protection Agency, Superfund
Dana Barton
75 Hawthorne Street
San Francisco, CA 94105

We hope you can help us facilitate a meeting with Regional Administrator Mike Stoker and the Del Amo Action Committee as soon as possible.

This matter is in regards to the Administrative Settlement Agreement and order on Consent for Removal Actions In the Matter of Ecology Control Industries, Inc. Removal Site, Los Angeles, California CERCLA Docket NO# 2018-07 (attached) and our comments (attached).

Yesterday community representatives and the Del Amo Action Committee met with Supervisor Ridley-Thomas' Staff members and two representatives of Bridge Development LLC, new owners of the Ecology Controls Site.

The developers stated that the EPA has provided them guidance since their early December 2017 discussions. That the EPA has stated to them what they wanted to see done at this property and the developers have complied with no negotiation on what EPA has laid out. They stated the site will be **capped and contamination contained in place.**

This is a remedial decision and the superfund cleanup process has been abandoned.

This agreement we feel violates the Superfund clean-up process Congress established the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) in 1980 and with its amendments.

There are four goals to this process:

Protect human health and the environment by cleaning up polluted sites;

Make responsible parties pay for cleanup work;

Involve communities in the Superfund process; and

Return Superfund sites to productive use.

The current fast track this property is on with EPA as the lead is to bypass community involvement as much as possible.

Instead of completing the nine step process:

Preliminary Assessment/Site Investigation

National Priorities Listing

Remedial Investigation/Feasibility Study

Record of Decision

Remedial Design/Remedial Action

Construction Complete

Post Construction Completion

National Priority Listing Deletion

Site Reuse/Redevelopment

It seems this site has skipped ahead to Site Reuse/Redevelopment with little opportunity for the community to weigh in on the landuse development decisions at this portion of the Montrose Chemical Site Operable Unit 6: Historical Stormwater Pathway South. Decisions that will add to the health impacts this already overburden community is dealing with; two MEGA Superfund sites and multiple other sources adding to the cumulative impacts suffered here.

Time is of the essence for our meeting so we may attempt to bring community involvement back into the decision making. The Del Amo Action Committee has been formed by the community and run by the community since 1992, more than 26 years. We have a vision for a healthier community that must be honored.

*Sincerely,
Cynthia Babich
Cynthia Medina
Florence Gharibian
Jan Kalani
Savannah Medina*



General Plan

MOTION BY CHAIR HILDA L. SOLIS AND SUPERVISOR MARK RIDLEY-THOMAS DECEMBER 8, 2015

Development and Implementation of Equitable Development Tools

On March 23, 2015, the Board of Supervisors (Board) held a public hearing for the General Plan

WE THEREFORE, MOVE THAT THE BOARD OF SUPERVISORS: MOTION
RIDLEY-THOMAS * KUEHL * KNABE * ANTONOVICH * SOLIS

Declare that it is the intent of the Board of Supervisors to implement the Los Angeles County General Plan in a manner that promotes sustainable, healthy, and well- designed environments that enhance the quality of life and public well-being for all residents in the unincorporated areas; and instruct the Director of the Department of Regional Planning, in coordination with the Directors of other appropriate Departments, potentially including but not limited to Public Works, Public Health, Parks and Recreation, Community Development Commission, County Counsel, and the Fire Department, to initiate an Equitable Development Work Program consisting of the following:

- Update the density bonus ordinance to further ease and incentivize the low-income households; and other changes to strengthen the effectiveness of the ordinance.
- Initiate discussions with the City of Los Angeles on a nexus study for the creation of a linkage fee.
- Provide a menu of options for the implementation of an inclusionary housing program. The program should consider on-site affordable units as a mandatory component of for-sale housing projects and propose approaches to requiring rental projects to provide on-site affordable units in exchange for discretionary entitlements, public subsidy, and other public concessions.
- Review the regulatory barriers to the establishment and expansion of community land trusts and other shared equity models, and potential incentives to promote their greater adoption.
- Propose additional strategies to preserve existing affordable housing and incentivize the production of new affordable housing; identify any necessary procedural and state and local legislative adjustments.
- Produce a map of contaminated sites, such as Superfund sites, brownfields, and toxic “hotspots” in the unincorporated areas, and provide recommendations on targeted land use policies that can be used to improve the health and quality of life for surrounding residents.
- Develop tools, including heat maps, equity scorecards, healthy design guidelines, and other approaches to evaluate, monitor, and advance equity objectives in the implementation of the General Plan, using relevant data from other County Departments as necessary to ensure a comprehensive analysis.
- Direct the Director of the Department of Regional Planning to develop a framework for facilitating robust engagement with affordable housing, economic development, and environmental justice experts designed to provide technical assistance in carrying out this work and to support the Board in strengthening these equitable development tools and exploring new policies that promote equitable growth. The framework may include establishment of an advisory committee.
- Develop the Equitable Development Work Program in consultation with the Healthy Design Workgroup, the Homeless Initiative, and the Affordable Housing Steering Committee, to ensure efficiencies and coordination, and report back to the Board in writing quarterly with an update on the status of implementation and a timeline for the advancement of ongoing initiatives.

Governor's Office of Planning and Research (OPR)

Document Summary

State of California 2017: General Plan Guidelines Chapter 2

Considerations for General Plans Area Plans, Community Plans, and Specific Plans

Area and community plans are part of the general plan. A specific plan is a tool for implementing the general plan but is not part of the general plan. The following paragraphs look briefly at each of these types of plans. In addition to consistency between plans, general plans must also be consistent with airport land use compatibility plans in specified regions, unless overridden by a two-thirds vote of the local government, pursuant to Public Utilities Code section 21676. "Area plan" and "community plan" are terms for plans that focus on a particular region or community within the overall general plan area. A resolution is required to adopt an area or community plan as an amendment to the general plan, in the manner set out in Government Code section 65350. Such plans refine the policies of the general plan as they apply to a smaller geographic area and are implemented by ordinances and other discretionary actions, such as zoning. The area or community plan process also provides a forum for resolving local conflicts. Large cities and counties where there are a variety of distinct communities or regions commonly use these plans.

An area or community plan must be internally consistent with the general plan. To facilitate such consistency, the general plan should provide a policy framework for the detailed treatment of specific issues in the various area or community plans. Ideally, to simplify implementation, the area or community plans and the general plan should share a uniform format for land use categories, terminology, and diagrams. Each area or community plan need not address all of the issues identified by Government Code section 65302 when the overall general plan satisfies these requirements. For example, an area or community plan need not discuss fire safety if the jurisdiction-wide plan adequately addresses the subject and the area or community plan is consistent with those policies and standards. While an area or community plan may provide greater detail regarding policies affecting development in a defined area, adopting one or a series of such plans does not substitute for regular updates to the general plan. Many of the mandatory general plan issues are most effectively addressed on a jurisdiction-wide basis that ties together the policies of the individual area or community plans

Specific plans must be consistent with all facets of the general plan, including the policy statements. In turn, zoning, subdivisions, and public works projects must be consistent with the specific plan (Gov. Code § 65455). Once a specific plan has been adopted, later projects may not require additional review (Cal. Code Regs., tit. 14, § 15182). The publication *A Planner's Guide to Specific Plans*, by the Governor's Office of Planning and Research (OPR), provides further information on relationships between plans.

Appendix B: California Environmental Quality Act (CEQA)

Warehouses and Overburdened Communities

*Attorney General Xavier Becerra
September 5, 2018, Letter to City of Los Angeles*



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SACRAMENTO, CA 94244-2550

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Telephone: (916) 210-7684
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E-Mail: Christie.Vosburg@doj.ca.gov

September 5, 2018

Ms. Terry Kaufmann-Macias
Managing Senior Assistant Attorney
Los Angeles City Attorney's Office
200 North Main Street, 7th Floor, MS 140
Los Angeles, CA 90012

RE: 15116-15216 South Vermont Avenue / 747-761 West Redondo Beach Boulevard, Los Angeles City Council File No. 18-0279, Environmental Document ENV-2017-1015-MND

Dear Ms. Kaufmann-Macias:

As we discussed on the phone August 3, 2018, our office has reviewed the mitigated negative declaration (MND) for the industrial warehouse distribution center project (the Project) proposed in the Harbor Gateway North neighborhood in the City of Los Angeles and we respectfully submit these comments regarding compliance with the California Environmental Quality Act (CEQA).¹

We recognize that the City has undertaken several initial studies to determine whether the proposed warehouse may have a significant impact on the environment. Nevertheless, the MND falls short of adequately analyzing, disclosing, and mitigating to the extent feasible the significant environmental impacts of the Project. While the Project will draw significant new air pollution into the Harbor Gateway North community, the City has failed to adequately characterize these impacts. In addition, the City has failed to apply enforceable mitigation measures as required by CEQA.

A warehouse project of this scale and size, surrounded by a community that is already overburdened by pollution, necessitates a complete and transparent environmental review process provided by the preparation of an environmental impact report (EIR). While the City has laid the foundation of an adequate environmental analysis of the project through its preparation of initial studies, CEQA requires that the City take the next step and prepare a full EIR.

¹ The Attorney General submits these comments pursuant to his independent power and duty to protect the environment and natural resources of the State. (See Cal. Const., art. V, § 13; Gov. Code, §§ 12511, 12600-12612; D'Amico v. Bd. of Medical Examiners (1974) 11 Cal.3d 1,1415.)

BACKGROUND

I. THE PROJECT

The Project is a one-story 341,402 square foot warehouse that will have a total of 223 automobile parking spots, a minimum of 71 truck trailer parking spots, and 36 truck loading positions.² The Project will be permitted to operate 24 hours a day, seven days a week, with some limitations on the activities that can occur at night.³ The Project allows truck entrance and exits from two points—one on Orchard Avenue with space for at least four trucks to queue and another on Vermont Avenue with space for at least three trucks to queue.⁴ The Project is estimated to generate 1,321 daily automobile roundtrips.⁵ Its not clear what the Project eventually will be used for, as the ultimate tenant and use is not yet identified, but the City proposes to permit use for warehousing, manufacturing, or as a “high-cube warehouse distribution center.”⁶ The City requires additional future approvals should the future tenant plan to use the facility for cold storage or as a fulfillment center.⁷

II. THE PROJECT SETTING IS CHARACTERIZED BY SENSITIVE RECEPTORS ALREADY EXPOSED TO SIGNIFICANT POLLUTION BURDENS

Harbor Gateway North is a neighborhood already heavily burdened by multiple sources of pollution. It ranks in the 100th percentile for overall pollution burden and in the top 5% for pollution burden and vulnerability combined according to the California Environmental Protection Agency’s screening tool CalEnviroScreen.⁸ The I-110 freeway cuts through the

² Los Angeles City Planning Commission, Letter of Determination, Case No. CPC-2017-1014-CU-ZAA-SPR (March 16, 2018), at p. 1 (hereafter “Letter of Determination”).

³ Letter of Determination, Condition 17, at p. C-3. Loading and unloading activity is prohibited within 300 feet from residential buildings between 10:00 pm and 7:00 am. (*Id.*, Condition 32, at p. C-6.) It is not clear how much of the Project activity will fall into this time restriction, and therefore not clear whether it will mitigate impacts of overnight noise and vibration impacts.

⁴ *Id.*, Condition 28, at p. C-6.

⁵ Kunzman Associates, Inc., South Bay Distribution Center (15134 S. Vermont Avenue) Air Quality, Global Climate Change, and Health Risk Assessment Impact Analysis (October 13, 2017), p. 59 (hereafter Air Quality Study).

⁶ Letter of Determination, Condition 2, at p. C-1. A high cube warehouse is “used primarily for the storage and/or consolidation of manufactured goods (and to a lesser extent, raw materials) prior to their distribution to retail locations or other warehouses.” Institute of Transportation Engineers, High Cube Warehouse Vehicle Trip Generation Analysis (October 2016), available at <http://library.ite.org/pub/a3e6679a-e3a8-bf38-7f29-2961becdd498>.

⁷ Letter of Determination, Condition 27, at p. C-6.

⁸ CalEnviroScreen is a tool created by the Office of Environmental Health Hazard Assessment that uses environmental, health, and socioeconomic information to produce scores and rank every census tract in the state, available at <https://oehha.ca.gov/calenviroscreen> (as of

neighborhood, making it no surprise that the community is in the 95th percentile for traffic burdens and 82nd percentile for diesel and particulate matter (PM) 2.5. In addition, the neighborhood is in the 95th percentile for solid waste sites, 95th percentile for leaking underground storage tanks, and 90th percentile for hazardous waste sites. The community is majority Hispanic (63%) and almost entirely made up of people of color (94%). The community that surrounds the project has high asthma rates and low birth weights relative to the rest of the state—higher than 79% and 80% of the state respectively. Other features of the community tend to make it more vulnerable to pollution, including high housing burdens, high rates of unemployment, and linguistic isolation.

The Project is located on a vacant 15-acre lot zoned for light manufacturing land uses.⁹ The Project is surrounded by:

1. Single and multi-family homes to the south along Redondo Beach Boulevard;
2. A nursing home and other light commercial land uses to the west, such as a barber shop, along Vermont Ave;
3. Rosecrans Recreation Center—a public park with outdoor sports fields—to the north along a railroad easement; and
4. One-story light commercial buildings to the east and a construction and demolition recycling facility to the northeast along Orchard Ave.

Amestoy Elementary School is kitty corner to the northwest corner of the Project and several senior facilities, churches, and a hospital are within half a mile of the Project.¹⁰ Harbor Gateway North Neighborhood Council asserts in its comment letter that 200 single family homes and 20 apartment buildings containing 184 units are near and would be impacted by the Project.¹¹ The nearest sensitive receptor, the Rosecrans Recreation Center, is approximately 80

July 17, 2018). A census tract with a high score is one that experiences a much higher pollution burden than a census tract with a low score. Office of Environmental Health Hazard Assessment, CalEnviroScreen 3.0 Report (January 2017), available at <https://oehha.ca.gov/media/downloads/calenviroscreen/report/ces3report.pdf>.

⁹ Department of City Planning Recommendation Report prepared for February 8, 2018 City Planning Commission Hearing, at pp. A-1–A-2.

¹⁰ Letter to Department of City Planning from Harbor Gateway North Neighborhood Council, December 14, 2017.

¹¹ *Ibid.*

feet away.¹² Other sensitive receptors, such as homes and a senior facility, are between 100-550 feet away, including the elementary school which is within 500 feet of the Project.¹³

The I-110 freeway is 650 feet away from the Project and appears to be the most likely source of truck traffic to and from the Project.¹⁴ Trucks entering and exiting the I-110 freeway would traverse Redondo Beach Boulevard, lined with single- and multi-family homes, turning right onto and queuing at the entrance points on Orchard Avenue or Vermont Avenue, where a nursing home and elementary school are situated.¹⁵

COMMENTS

I. THE CITY HAS NOT ADEQUATELY ANALYZED, DISCLOSED, OR MITIGATED THE SIGNIFICANT IMPACTS OF THE PROJECT

California law requires a public agency approving a project to prepare an EIR when the project may have a significant effect on the environment.¹⁶ The EIR is the “heart of CEQA”—it informs the public and decision makers of the environmental consequences of their decisions before those decisions are made—and therefore there is a low threshold for the requirement.¹⁷ If after conducting initial studies the agency determines that there is no substantial evidence in the record supporting a “fair argument” that a project may have a significant effect on the environment, it may prepare a negative declaration.¹⁸ The significance of the activity varies with the setting.¹⁹

Here, while the City has undertaken several studies to evaluate the environmental impacts of the Project, it has substantially ignored or downplayed the existing environmental conditions and sensitive receptors surrounding the Project, resulting in an incomplete and unsupported conclusion that the Project will not have significant and cumulative impacts. Since the ultimate tenant is not known, the City must evaluate the impacts of all potential uses of the Project, including manufacturing and use as a cold storage facility or fulfillment center, rather than inappropriately deferring that decision for future environmental analysis. Furthermore, the City has included unenforceable and inappropriately deferred mitigation measures in its attempt to reduce the Project’s significant environmental impacts. The Project must be denied until a

¹² Letter of Determination, Finding 2, at p. F-2.

¹³ Air Quality Study, at p. 2; Mitigated Negative Declaration, ENV-2017-1015-MND, at p. 3.

¹⁴ Letter of Determination, Finding 2, at p. F-2.

¹⁵ See *id.*, Condition 28, at p. C-6.

¹⁶ Pub. Resources Code § 21082.2, subd. (a); CEQA Guidelines, § 15064, subd. (a); *Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322, 330.

¹⁷ *Mejia*, 130 Cal.App.4th at pp. 330-332.

¹⁸ *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1399-1400.

¹⁹ *Mejia*, 130 Cal.App.4th at p. 331; CEQA Guidelines, § 15064, subd. (b).

complete environmental analysis assessing its impacts has been conducted and feasible mitigation measures to reduce those impacts have been imposed.

A. The City Neglects to Analyze the Projects Significant Environmental Impacts on Nearby Sensitive Receptors

“A project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant.”²⁰ A lead agency must evaluate whether a project will expose “sensitive receptors” to pollution.²¹ In the air pollution context, CARB recommends a minimum separation between sensitive receptors and sources of air pollution to reduce the sensitive population’s exposure to increased health risks.²² Children and the elderly are especially vulnerable to the health impacts associated with exposure to diesel particulate matter and other air pollution, including cancer, asthma, and heart disease.²³ Because of this, CARB recommends 1,000 feet separation between sensitive receptors and distribution centers or other land uses that would generate more than 100 trucks per day.²⁴

The City at times acknowledges and at other times downplays the Project’s close proximity to sensitive receptors.²⁵ But there is no question the Project is surrounded by sensitive receptors—children play outdoors at the park that is 80 feet away from the project and at recess at the school within 500 feet, elderly people live at the senior facility nearby, and families live in the hundreds of homes and apartments that surround the Project. These sensitive receptors are

²⁰ CEQA Guidelines, § 15300.2; *see also* CEQA Guidelines, § 15064, subd. (b); *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 718.

²¹ *See e.g.* CEQA Guidelines, App. G.

²² California Air Resources Board, Air Quality and Land Use Handbook: A Community Health Perspective (April 2005) (hereafter CARB Handbook); *see also* South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (May 6, 2005), at p. 2-3, 2-4 (hereafter SCAQMD Guidance).

²³ CARB Handbook, at p. ES 1.

²⁴ *Id.* at p. 4.

²⁵ Letter of Determination at p. F-2 states, “Given ... [the Project’s] relative isolation from sensitive uses, [the Project] will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.” *Also ibid.*, stating that other than the Rosecrans Recreation Center, the closest sensitive receptors are beyond 100 feet of the Project. *Compare* the MND at p. 20, listing the recreation center and several residences located within 100 feet of the Project, but still none beyond 100 feet. *Compare also* Air Quality Study at p. 2, describing sensitive receptors as including the Rosecrans Recreation Center, single- and multi-family dwellings around 100 feet away, the nursing home located 155 feet away, and additional homes 300-500 feet away, but not including the elementary school. The Air Quality Study concludes that due to distance of nearest sensitive receptors, the operational odor impacts would be less than significant. *Id.* at p. 63.

already exposed to significant air pollution from the I-110 freeway that is located just 650 feet away from the Project and in some instances even closer to the sensitive receptors.²⁶

Nevertheless, the City's health risk assessment analyzes impacts only on those sensitive receptors that are located within 100 feet of the Project, namely the Rosecrans Recreation Center and the homes that are directly across the street from the Project.²⁷ It does not articulate a basis for this distance, and it does not analyze impacts to the nursing home, elementary school, or additional homes that are within the 1,000-foot buffer recommended by CARB. It neglects to analyze impacts to these other sensitive receptors even while recognizing that the higher-than-average cancer risk already experienced by people in the area is "largely due to the proximity of the Santa Fe railroad lines and I-110 Freeway."²⁸ The size of this Project, the volume of additional mobile sources of air pollution it is anticipated to attract, and its close proximity to sensitive receptors, along with established CARB and SCAQMD guidance, raises a fair argument that there may be unmitigated environmental impacts that must be studied through a full environmental impact analysis.

The close proximity of sensitive receptors to the Project is especially troubling given the appellants' expert analysis that provides substantial evidence that the City has significantly undercounted the number of daily truck and passenger vehicle trips the project could bring into the community.²⁹ The expert report reveals that the City has undercounted the number of truck trips by 107%—318 truck trips per day—and that the total number of truck trips is more accurately estimated as 616 per day or 224,840 per year.³⁰ The City's conclusion that the project will have less than significant air quality impacts relies on a volume of trucks that is roughly half what it should be, and this infects the entire analysis, including the City's evaluation of health risks, noise impacts, and traffic impacts.

In addition to our concern about the significant impacts associated with additional trucks entering the area, we have concerns about the historical contamination located at the Project site. The site has a long history of industrial uses, including as a railroad substation and switch gallery, nursery, furniture and electrical cord manufacturing, and a gas station.³¹ There is evidence of releases of chemicals at the site, including tetrachloroethylene, trichloroethene, petroleum hydrocarbons, and heavy metals.³² There appears to be one underground storage tank abandoned in place and two underground storage tanks that are unaccounted for.³³ The MND

²⁶ Some homes are located in between the Project and the freeway along Redondo Beach Boulevard (along the likely truck route) and to the north east of the Project, between the Rosecrans Recreation Center and the freeway.

²⁷ Air Quality Study, at p. 71.

²⁸ *Id.* at p. 69.

²⁹ Talaro Appeal, Exhibit B, SWAPE Comments, at pp. 4-8.

³⁰ *Id.* at p. 6.

³¹ *Id.* at pp. 1-2.

³² *Id.* at p. 2.

³³ *Id.* at pp. 2-3.

does not study the impacts of any necessary clean up activity, including the generation of contaminated dust that workers and nearby sensitive receptors could be exposed to. Rather than study these foreseeable impacts, the City requires the applicant to obtain environmental reports relating to the site and submit to regulatory agencies “evidence . . . that the site has been adequately remediated and that the project would not constitute a health risk to the environment or the public.”³⁴ Similarly, the Letter of Determination requires the applicant to get approval from appropriate regulatory agencies for plans to handle hazardous materials from the site.³⁵ These reports and evidence must be gathered and analyzed, and the impacts from any necessary cleanup activity mitigated, through the development of an EIR before Project approval.

B. The City Has Not Analyzed nor Mitigated the Project’s Significant Cumulative Impacts

CEQA requires a lead agency to consider whether a project’s effects, while limited on their own, are “cumulatively considerable” and therefore significant. “Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.³⁶ This requires a lead agency to determine whether pollution from a proposed project together with any pollution the community is already exposed to will be significant.

The City concludes that the Project’s impacts even when combined with the effects of other projects is less than significant. In its Air Quality Study, the city contends that the cumulative air quality impact analysis must be “generic” because the “greatest source of emissions is from mobile sources” which travel outside the project area.³⁷ While it admits that the Project will have incremental impacts on the already degraded local air quality, it concludes that because the Project will not exceed SCAQMD’s significance thresholds, it will not have a significant cumulative impact.³⁸ Similarly, even though the ambient cancer risk in the Project area is double that of the county-wide cancer risk—the cancer risk is 993.3 in one million in the Project area versus 415 in one million countywide—the City concludes the Project’s cumulative impacts are less than significant because the Project’s contribution to the cancer risk does not meet SCAQMD’s threshold for that criteria.³⁹

³⁴ Letter of Determination, Condition 39, at p. C-7.

³⁵ *Id.* at Condition 40, at p. C-7.

³⁶ Pub. Resources Code § 21083, subd (b)(3).

³⁷ Air Quality Study, at p. 60.

³⁸ *Id.* at pp. 60-61.

³⁹ SCAQMD’s comments on the MND calls into question whether the Air Quality Study’s health risk assessment adequately calculated the cancer risk because it averaged the diesel exposure over 30 years instead of acknowledging the reality that the exposure would be higher in the early years of the Project than in the later years, exposing the children present during the earlier years to higher diesel levels and a correspondingly higher cancer risk.

The City does not analyze the existing diesel pollution generated by the I-110 freeway that is 650 feet away from the Project and even closer to some of the nearby sensitive receptors, nor does it discuss the Project's contribution to that known source of air pollution or its impact on the surrounding community. Air pollution studies indicate that residents living up to 1,000 feet away from freeways experience higher adverse health impacts than those who live further away from freeways, including a variety of respiratory symptoms, asthma, and decreased lung function in children.⁴⁰ Proximity to freeways increases cancer risks as well.⁴¹ Because of this, state law restricts the siting of new schools within 500 feet of a freeway.⁴² Yet, the City has not analyzed whether the Project with its expected contribution to air pollution would be cumulatively considerable when added to the air pollution from the nearby freeway. This is particularly necessary given the close proximity of the surrounding sensitive receptors, both to the freeway and the Project.⁴³

Furthermore, nowhere does the City acknowledge or study the cumulative impacts of the nearby construction demolition debris recycling facility, which would have a shared access point with the Project on Orchard Avenue. That facility can reasonably be expected to draw heavy duty trucks and vehicles into the area, such that even if the Project impacts alone were not significant, when combined with the existing truck traffic generated by the recycling facility, the impacts could be cumulatively considerable. Other impacts could become cumulatively considerable when considered in combination with the recycling facility's nearby operation, including noise, air quality, odors, water quality, and hazardous materials. The significance of the Project's impacts must be evaluated when combined with the impacts associated with these other nearby projects and activities.

C. The City Has Not Included All Feasible, Enforceable Mitigation Measures.

CEQA prohibits agencies from approving projects with significant environmental effects where there are feasible mitigation measures that would substantially lessen or avoid those effects.⁴⁴ The lead agency is expected to develop mitigation in an open public process.⁴⁵ "The development of mitigation measures . . . is not meant to be a bilateral negotiation between a project proponent and the lead agency after project approval; but rather, an open process that also

⁴⁰ CARB Handbook, at p. 8.

⁴¹ *Id.*, at p. 9

⁴² Pub. Resources Code, § 21151.8.

⁴³ Rosecrans Recreation Center appears to be about the same distance away from the freeway as the Project, or 700 feet. As a result, the children who play at that park would be exposed to the freeway pollution as well as the Project's pollution. Homes north and south of the Project are well within 1,000 feet of the freeway.

⁴⁴ Pub. Resources Code, § 21100, subd. (b)(3).

⁴⁵ *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 93.

involves other interested agencies and the public.⁴⁶ Mitigation measures must be fully enforceable and cannot be deferred to a future time.⁴⁷

The MND asserts that its relatively limited mitigation measure III-0, which limits the VOC content for architectural coatings, mitigates the air quality impacts of the Project. Additional mitigation measures identified in the Air Quality Study and ultimately included in the Letter of Determination likewise do not address the mobile source emissions.⁴⁸ But the impacts of the Project primarily come from the increase in mobile sources in the area.

The City attempted to address some of CARB and SCAQMD's comments about the inadequate mitigation of the Project's impacts. While some improvements were made, such as an increase in electric vehicle infrastructure and parking,⁴⁹ most of the conditions that were added to address the air pollution control agencies' concerns are unenforceable. For example, the conditions include requiring truck routes to be developed, adopted, and clearly marked, all at some future point without additional City review or input and with the single criteria that trucks should not enter residential areas. It is not clear what the City means by preventing trucks from entering residential areas, since the Project is surrounded by residential areas and the only access to the Project involves truck routes that pass by homes. Some of the homes where trucks would traverse are well within the 1,000 feet of the I-110, where health impacts from exposure to the freeway's pollution would be expected to occur. The City must define truck routes and analyze them as part of Project's environmental review and approval.

Further, the City purports to limit the daily number of trucks allowed at the Project to 338 (the amount analyzed by the City's initial studies), but this limitation is an unenforceable recommendation. The Letter of Determination states that "[i]f higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to reevaluating the project through CEQA prior to allowing this land use or higher activity level." Since the MND and the initial studies analyze the Project based on the assumption that the number of truck trips would be 338, this unenforceable mitigation measure calls into question the entire environmental analysis, especially the noise, odor, traffic, air quality, and health risk assessment analyses.

These conditions were added after the MND's comment period concluded and the hearing was conducted, appearing for the first time in the final Letter of Determination adopted and published by the City Planning Commission on March 16, 2018. Contrary to CEQA's purpose of having an open process for developing mitigation measures, the public did not have an opportunity to review or comment on them. They are not addressed in the City's Mitigation Monitoring Program.

⁴⁶ *Ibid.*

⁴⁷ CEQA Guidelines, § 15126.4

⁴⁸ The Air Quality Study identified only three mitigation measures, 1) limiting VOC content in architectural coatings, 2) requiring recycling programs to reduce waste going to landfills, and 3) requiring building structures to meet green building code standards.

⁴⁹ Letter of Determination, Conditions 6 and 8, at pp. C-1-C-2

Some of CARB's and SCAQMD's recommended mitigation measures are not incorporated or addressed by the City at all, including the following: (1) requiring 2010 model year or newer haul trucks be use to reduce emissions; (2) requiring an accelerated phase-in of non-diesel-powered truck if the Project generates significant regional emissions; (3) creating a buffer zone that could be office space, greenbelt, or parking of 1,000 feet between the warehouse and the nearby sensitive receptors; and (4) ensuring that trucks queue well inside the Project boundaries (not near sensitive receptors). These mitigation measures must be considered by the City and if infeasible, that explanation must be provided.

II. LOS ANGELES CITY CODE VIOLATIONS

The Project requires a conditional use permit because it is a "major development project" creating more than 250,000 square feet of warehouse floor area. (Los Angeles Municipal Code section 12.24-U 14(a).) To approve this permit, the City must find that 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." (Los Angeles Municipal Code section 12.24-E 2.) The City finds that given "it's relative isolation from sensitive uses, and its proximity to Harbor Freeway I-110, the proposed [project] will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety." That finding is unsupported. The location of the freeway, a constant source of air and noise pollution for the community, cannot be used as the basis for the City's assertion that the Project will not adversely affect the Harbor Gateway North community. The statement that the Project is isolated from sensitive receptors also is not supported by the evidence before the City. Furthermore, the City's findings rely on the MND's inadequate environmental impacts analysis to reach this conclusion.

CONCLUSION

The City has provided some information regarding the foreseeable significant environmental impacts of the large industrial warehouse Project and incorporated some mitigation measures to reduce those significant environmental impacts. Nevertheless, it has not fully studied or addressed the potential significant and cumulative environmental impacts that the nearby sensitive receptors will be exposed to as a result of the Project and has not included all feasible, enforceable mitigation measures to reduce those impacts, as required by CEQA. The already overburdened nearby community is entitled to full disclosure and mitigation of the environmental impacts of the Project prior to its approval.

September 5, 2018
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Sincerely,



CHRISTIE VOSBURG
Supervising Deputy Attorney General

For XAVIER BECERRA
Attorney General

CC: The Honorable Jose Huizar, LA City Council PLUM Committee Chair
Zina Cheng, Clerk, LA City Council PLUM Committee
Joe Buscaino, LA City Councilman, District 15
Scott Mulkay, Vice President, Prologis, Applicant
Armen Ross, The Ross Group, Applicant's Representative
Oliver Netburn, LA City Planner
Gideon Kracov, Appellant Representative

Appendix C: Public Health Information

Chemicals of Concern and *where they are in our community*

Diesel Particulate Matter:



California has identified diesel PM as a toxic air contaminant (TAC) based on its potential to cause cancer. Diesel engines emit very large amounts of carbon particles or "soot" also known as diesel particulate matter (PM). Diesel exhaust contains more than 40 cancer-causing substances that adhere to the soot. Diesel PM comprises about 8% of outdoor fine particulate matter (PM_{2.5}), which is a known health hazard because of its ability to easily enter the lungs.

- Air: heavy truck traffic concentrated on Torrance Blvd. and Normandie Ave.
- Air: impacted by warehouse that the Trucks are coming and going from
- Air: being concentrated on Torrance Blvd. and Normandie Ave., lack of traffic flow
- Air: infused with exhaust from goods movement from Ports along 110 and 405 freeways

Benzene:



Cancer causing; effects bone marrow; can cause anemia and leukemia and death.

- Groundwater: contaminated under homes from the Del Amo Superfund site
- Air: inside and outside from vapors from the groundwater coming up through the soil
- Air: drifting from the Torrance Refinery from gasoline and other petroleum products
- Air: emitted from diesel trucks it is one of many toxic air contaminants (TAC's)
- Air: tobacco smoke, cars and industrial emissions also add to benzene in our Air.

DDT, DDE and DDD

DDT affects the nervous system causing excitability, tremors and seizures. DDE can cause increased chance of having a premature baby.

- Soil: in many yards and on the Montrose Superfund site
- Dust: in our attics
- In home raised chickens and eggs
- Groundwater: under homes



pCBSA

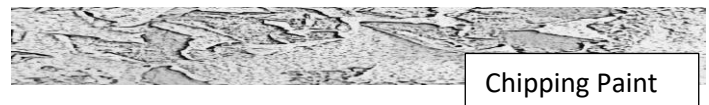
pCBSA is a by-product of the production of dichloro-diphenyl-trichloroethane (DDT). pCBSA is highly water soluble and has contaminated aquifers beneath the community.

- Groundwater: throughout the community
- Clean up levels not adequate
- Lack of studies on health impacts.

Lead

The effects of lead are the same whether it enters the body through inhalation or ingestion. Lead can affect almost every organ and system in your body. The nervous system is the main target for lead toxicity in adults and children.

- Water pipes: in some older homes
- Soil: from slag buried in the community
- Homes: with deteriorating chipping paint



Trichloroethylene (TCE)

Exposure to moderate amounts of trichloroethylene may cause headaches, dizziness, and sleepiness; large amounts may cause coma and even death.

- Air: inside the homes, vapor intrusion
- Groundwater: under the community
- Soil: at the Montrose and ECI/Bridge sites



California Air Resources Board

Summary: Diesel Particulate Matter Health Impacts

Diesel engines emit a complex mixture of pollutants, including very small carbon particles, or "soot" coated with numerous organic compounds, known as diesel particulate matter (PM). Diesel exhaust also contains more than 40 cancer-causing substances, most of which are readily adsorbed onto the soot particles. In 1998, California identified diesel PM as a toxic air contaminant (TAC) based on its potential to cause cancer. Other agencies, such as the National Toxicology Program, the U.S. Environmental Protection Agency and the National Institute of Occupational Safety and Health, concluded that exposure to diesel exhaust likely causes cancer. The most recent assessment (2012) came from the World Health Organization's International Agency for Research on Cancer (IARC). IARC's extensive literature review led to the conclusion that diesel engine exhaust is "carcinogenic to humans," thereby substantiating and further strengthening California's earlier TAC determination.

Diesel engine emissions are believed to be responsible for about 70% of California's estimated known cancer risk attributable to toxic air contaminants. **1** Also, diesel PM comprises about 8% of outdoor fine particulate matter (PM2.5), which is a known health hazard. As a significant fraction of PM2.5, diesel PM contributes to numerous health impacts that have been attributed to particulate matter exposure, including increased hospital admissions, particularly for heart disease, but also for respiratory illnesses, and even premature death. **2** ARB estimates that diesel PM contributes to approximately 1,400 (95% confidence interval: 1,100-1,800) premature deaths from cardiovascular disease annually in California. **3** Additionally, exposure to diesel exhaust may contribute to the onset of new allergies; a clinical study of human subjects has shown that diesel exhaust particles, in combination with potential allergens, may actually be able to produce new allergies that did not exist previously.

Several factors exacerbate the health risks of diesel PM exposure:

- Diesel PM is often emitted close to people so high exposures occur
- Diesel PM is in a size range that readily deposits in the lung
- Diesel PM contains compounds known to damage DNA and cause cancer

Additionally, diesel PM pollution can affect the environment:

- Diesel PM causes visibility reduction
- Diesel black carbon (soot) is a potent contributor to global warming

Assessments of Diesel Exhaust Health Impacts

Agency	Date	Summary of Findings
The National Institute for Occupational Health and Safety (NIOSH)	1988	<ul style="list-style-type: none"> • Animal evidence "confirmatory" for carcinogenesis • Human evidence "limited" • Diesel exhaust classified as "potential occupational carcinogen"
International Agency for Research on Cancer (IARC)	1989	<ul style="list-style-type: none"> • Rat data "sufficient" for carcinogenicity • Human epidemiology data "limited" • Diesel exhaust considered a "probable" human carcinogen
World Health Organization (WHO)	1996	<ul style="list-style-type: none"> • Rat data support carcinogenicity • Human epidemiology data suggest "probably carcinogenic" • Epidemiology studies considered "inadequate for a quantitative estimate of human risk"

Agency	Date	Summary of Findings
California Environmental Protection Agency	1998	<ul style="list-style-type: none"> Rat data “have demonstrated” carcinogenicity of diesel exhaust particles Causal association of diesel exhaust and lung cancer in epidemiology studies is a “reasonable and likely explanation” Designated diesel particulate matter a “toxic air contaminant”
National Toxicology Program (NTP)	2000	<ul style="list-style-type: none"> Diesel exhaust particulates listed as “reasonably anticipated to be a human carcinogen” based on findings of elevated lung cancer in occupational groups exposed to diesel exhaust and supporting animal and mechanistic studies
U.S. Environmental Protection Agency (EPA)	2002	<ul style="list-style-type: none"> Diesel emissions considered “likely to be carcinogenic to humans” Strong but less than sufficient epidemiologic evidence Evidence of carcinogenicity of diesel exhaust particles in rats and mice by non-inhalation routes of exposure Extensive supportive data including the demonstrated mutagenic and/or chromosomal effects of diesel exhaust and its organic constituents
U.S. Environmental Protection Agency (EPA)	2009	<ul style="list-style-type: none"> Although not diesel-specific, the relationship between particulate matter (such as diesel PM) and premature mortality was determined to be causal
National Toxicology Program (NTP)	2011	<ul style="list-style-type: none"> Diesel exhaust particulates listed as “reasonably anticipated to be a human carcinogen, based on limited evidence of carcinogenicity from studies in humans and supporting evidence from studies in experimental animals and mechanistic studies”
International Agency for Research on Cancer (IARC; part of the World Health Organization (WHO))	2012	<ul style="list-style-type: none"> Diesel engine exhaust classified as “carcinogenic to humans” “Sufficient evidence” in humans for diesel exhaust as a cause of lung cancer “Limited evidence” for increased risk of bladder cancer

- 1. Based on estimated ambient statewide diesel PM levels in 2012; the current cancer risk is estimated to be 520 new cases of cancer projected to occur per million residents exposed. This estimate was calculated using a unit risk factor of $8.94 \times 10^{-4} \mu\text{g}/\text{m}^3$ derived using methodology developed by the California Office of Environmental Health Hazard Assessment (<http://oehha.ca.gov/media/downloads/crnrr/appendixa.pdf>) and assumes an ambient diesel PM concentration of $0.58 \mu\text{g}/\text{m}^3$. Derivation of both of these values are summarized in Propper et al. 2015. *Environmental Science & Technology*49(19):11329–11339.
- 2. A more extensive list of health impacts associated with particulate matter exposure was released in 2009 by the U.S. Environmental Protection Agency
- 3. Based on 2009 to 2011 exposure

Contact

Air Resources Board, Research Division
 Email: research@arb.ca.gov Phone: (916) 445-0753

This fact sheet answers the most frequently asked health questions (FAQs) about benzene. For more information, call the CDC Information Center at 1-800-232-4636. This fact sheet is one in a series of summaries about hazardous substances and their health effects. It is important you understand this information because this substance may harm you. The effects of exposure to any hazardous substance depend on the dose, the duration, how you are exposed, personal traits and habits, and whether other chemicals are present.

HIGHLIGHTS: Benzene is a widely used chemical formed from both natural processes and human activities. Breathing benzene can cause drowsiness, dizziness, and unconsciousness; long-term benzene exposure causes effects on the bone marrow and can cause anemia and leukemia. Benzene has been found in at least 1,000 of the 1,684 National Priority List (NPL) sites identified by the Environmental Protection Agency (EPA).

What is benzene?

Benzene is a colorless liquid with a sweet odor. It evaporates into the air very quickly and dissolves slightly in water. It is highly flammable and is formed from both natural processes and human activities.

Benzene is widely used in the United States; it ranks in the top 20 chemicals for production volume. Some industries use benzene to make other chemicals which are used to make plastics, resins, and nylon and other synthetic fibers. Benzene is also used to make some types of rubbers, lubricants, dyes, detergents, drugs, and pesticides. Natural sources of benzene include emissions from volcanoes and forest fires. Benzene is also a natural part of crude oil, gasoline, and cigarette smoke.

What happens to benzene when it enters the environment?

- Industrial processes are the main source of benzene in the environment.
- Benzene can pass into the air from water and soil.
- It reacts with other chemicals in the air and breaks down within a few days.
- Benzene in the air can attach to rain or snow and be carried back down to the ground.
- It breaks down more slowly in water and soil, and can pass through the soil into underground water.
- Benzene does not build up in plants or animals.

How might I be exposed to benzene?

- Outdoor air contains low levels of benzene from tobacco smoke, automobile service stations, exhaust from motor vehicles, and industrial emissions.
- Vapors (or gases) from products that contain benzene, such as glues, paints, furniture wax, and detergents, can also be a source of exposure.
- Air around hazardous waste sites or gas stations will contain higher levels of benzene.
- Working in industries that make or use benzene.

How can benzene affect my health?

Breathing very high levels of benzene can result in death, while high levels can cause drowsiness, dizziness, rapid heart rate, headaches, tremors, confusion, and unconsciousness. Eating or drinking foods containing high levels of benzene can cause vomiting, irritation of the stomach, dizziness, sleepiness, convulsions, rapid heart rate, and death.

The major effect of benzene from long-term exposure is on the blood. Benzene causes harmful effects on the bone marrow and can cause a decrease in red blood cells leading to anemia. It can also cause excessive bleeding and can affect the immune system, increasing the chance for infection. Some women who breathed high levels of benzene for many months had irregular menstrual periods and a decrease in the size of their ovaries, but we do not know for certain that benzene caused the effects. It is not known whether benzene will affect fertility in men.

How likely is benzene to cause cancer?

Long-term exposure to high levels of benzene in the air can cause leukemia, particularly acute myelogenous leukemia, often referred to as AML. This is a cancer of the blood-forming organs. The Department of Health and Human Services (DHHS) has determined that benzene is a known carcinogen. The International Agency for Research on Cancer (IARC) and the EPA have determined that benzene is carcinogenic to humans.

How can benzene affect children?

Children can be affected by benzene exposure in the same ways as adults. It is not known if children are more susceptible to benzene poisoning than adults.

Benzene can pass from the mother's blood to a fetus. Animal studies have shown low birth weights, delayed bone formation, and bone marrow damage when pregnant animals breathed benzene.

How can families reduce the risks of exposure to benzene?

Benzene exposure can be reduced by limiting contact with gasoline and cigarette smoke. Families are encouraged not to smoke in their house, in enclosed environments, or near their children.

Is there a medical test to determine whether I've been exposed to benzene?

Several tests can show if you have been exposed to benzene. There is a test for measuring benzene in the breath; this test must be done shortly after exposure. Benzene can also be measured in the blood; however, since benzene disappears rapidly from the blood, this test is only useful for recent exposures.

In the body, benzene is converted to products called metabolites. Certain metabolites can be measured in the urine. The metabolite 5-phenylmercapturic acid in urine is a sensitive indicator of benzene exposure. However, this test must be done shortly after exposure and is not a reliable indicator of how much benzene you have been exposed to, since the metabolites may be present in urine from other sources.

Has the federal government made recommendations to protect human health?

The EPA has set the maximum permissible level of benzene in drinking water at 5 parts benzene per billion parts of water (5 ppb).

The Occupational Safety and Health Administration (OSHA) has set limits of 1 part benzene per million parts of workplace air (1 ppm) for 8 hour shifts and 40 hour work weeks.

References

Agency for Toxic Substances and Disease Registry (ATSDR) 2007. Toxicological Profile for Benzene (Update). Atlanta, GA: U.S. Department of Public Health and Human Services, Public Health Service.

Where can I get more information?

For more information, contact the Agency for Toxic Substances and Disease Registry, Division of Toxicology and Human Health Sciences, 1600 Clifton Road NE, Mailstop F-57, Atlanta, GA 30329-4027.

Phone: 1-800-232-4636

ToxFAQs™ Internet address via WWW is <http://www1a.tsc.doe.gov/toxfaqs/index.asp>.

ATSDR can tell you where to find occupational and environmental health clinics. Their specialists can recognize, evaluate, and treat illnesses resulting from exposure to hazardous substances. You can also contact your community or state health or environmental quality department if you have any more questions or concerns.

DDT, DDE, and DDD - ToxFAQs™

CAS # 50-29-3, 72-55-9, 72-54-8

This fact sheet answers the most frequently asked health questions (FAQs) about DDT, DDE, and DDD. For more information, call the CDC Information Center at 1-800-232-4636. This fact sheet is one in a series of summaries about hazardous substances and their health effects. It is important you understand this information because this substance may harm you. The effects of exposure to any hazardous substance depend on the dose, the duration, how you are exposed, personal traits and habits, and whether other chemicals are present.

HIGHLIGHTS: Exposure to DDT, DDE, and DDD occurs mostly from eating foods containing small amounts of these compounds, particularly meat, fish and poultry. High levels of DDT can affect the nervous system causing excitability, tremors and seizures. In women, DDE can cause a reduction in the duration of lactation and an increased chance of having a premature baby. DDT, DDE, and DDD have been found in at least 442 of the 1,613 National Priorities List (NPL) sites identified by the Environmental Protection Agency (EPA).

What are DDT, DDE, and DDD?

DDT (dichlorodiphenyltrichloroethane) is a pesticide once widely used to control insects in agriculture and insects that carry diseases such as malaria. DDT is a white, crystalline solid with no odor or taste. Its use in the U.S. was banned in 1972 because of damage to wildlife, but is still used in some countries.

DDE (dichlorodiphenyldichloroethylene) and DDD (dichlorodiphenyldichloroethane) are chemicals similar to DDT that contaminate commercial DDT preparations. DDE has no commercial use. DDD was also used to kill pests, but its use has also been banned. One form of DDD has been used medically to treat cancer of the adrenal gland.

What happens to DDT, DDE, and DDD when they enter the environment?

- DDT entered the environment when it was used as a pesticide; it still enters the environment due to current use in other countries.
- DDE enters the environment as contaminant or breakdown product of DDT; DDD also enters the environment as a breakdown product of DDT.
- DDT, DDE, and DDD in air are rapidly broken down by sunlight. Half of what's in air breaks down within 2 days.
- They stick strongly to soil; most DDT in soil is broken down slowly to DDE and DDD by microorganisms; half the DDT in soil will break down in 2–15 years, depending on the type of soil.
- Only a small amount will go through the soil into groundwater; they do not dissolve easily in water.
- DDT, and especially DDE, build up in plants and in fatty tissues of fish, birds, and other animals.

How might I be exposed to DDT, DDE, and DDD?

- Eating contaminated foods, such as root and leafy vegetables, fatty meat, fish, and poultry, but levels are very low.
- Eating contaminated imported foods from countries that still allow the use of DDT to control pests.
- Breathing contaminated air or drinking contaminated water near waste sites and landfills that may contain higher levels of these chemicals.
- Infants fed on breast milk from mothers who have been exposed.
- Breathing or swallowing soil particles near waste sites or landfills that contain these chemicals.

How can DDT, DDE, and DDD affect my health?

DDT affects the nervous system. People who accidentally swallowed large amounts of DDT became excitable and had tremors and seizures. These effects went away after the exposure stopped. No effects were seen in people who took small daily doses of DDT by capsule for 18 months. A study in humans showed that women who had high amounts of a form of DDE in their breast milk were unable to breast feed their babies for as long as women who had little DDE in the breast milk. Another study in humans showed that women who had high amounts of DDE in the blood had an increased chance of having premature babies. In animals, short-term exposure to large amounts of DDT in food affected the nervous system, while long-term exposure to smaller amounts affected the liver. Also in animals, short-term oral exposure to small amounts of DDT or its breakdown products may also have harmful effects on reproduction.

Agency for Toxic Substances and Disease Registry
Division of Toxicology and Human Health Sciences



CS-2019-004

DDT, DDE, and DDD - ToxFAQs™

CAS # 50-29-3, 72-55-9, 72-54-8

How likely are DDT, DDE, and DDD to cause cancer?

Studies in DDT-exposed workers did not show increases in cancer. Studies in animals given DDT with the food have shown that DDT can cause liver cancer.

The Department of Health and Human Services (DHHS) determined that DDT may reasonably be anticipated to be a human carcinogen.

The International Agency for Research on Cancer (IARC) determined that DDT may possibly cause cancer in humans. The EPA determined that DDT, DDE, and DDD are probable human carcinogens.

How can DDT, DDE, and DDD affect children?

There are no studies on the health effects of children exposed to DDT, DDE, or DDD. We can assume that children exposed to large amounts of DDT will have health effects similar to the effects seen in adults. However, we do not know whether children differ from adults in their susceptibility to these substances.

There is no evidence that DDT, DDE, or DDD cause birth defects in people. A study showed that teenage boys whose mothers had higher DDE amounts in the blood when they were pregnant were taller than those whose mothers had lower DDE levels. However, a different study found the opposite in preteen girls. The reason for the discrepancy between these studies is unknown.

Studies in rats have shown that DDT and DDE can mimic the action of natural hormones and in this way affect the development of the reproductive and nervous systems. Puberty was delayed in male rats given high amounts of DDE as juveniles. This could possibly happen in humans.

A study in mice showed that exposure to DDT during the first weeks of life may cause neurobehavioral problems later in life.

How can families reduce the risk of exposure to DDT, DDE, and DDD?

- Most families will be exposed to DDT by eating food or drinking liquids contaminated with small amounts of DDT.
- Cooking will reduce the amount of DDT in fish.
- Washing fruit and vegetables will remove most DDT from their surface.
- Follow health advisories that tell you about consumption of fish and wildlife caught in contaminated areas.

Is there a medical test to show whether I've been exposed to DDT, DDE, and DDD?

Laboratory tests can detect DDT, DDE, and DDD in fat, blood, urine, semen, and breast milk. These tests may show low, moderate, or excessive exposure to these compounds, but cannot tell the exact amount you were exposed to, or whether you will experience adverse effects. These tests are not routinely available at the doctor's office because they require special equipment.

Has the federal government made recommendations to protect human health?

The Occupational Safety and Health Administration (OSHA) sets a limit of 1 milligram of DDT per cubic meter of air (1 mg/m³) in the workplace for an 8-hour shift, 40-hour workweek.

The Food and Drug Administration (FDA) has set limits for DDT, DDE, and DDD in foodstuff at or above which the agency will take legal action to remove the products from the market.

References

Agency for Toxic Substances and Disease Registry (ATSDR). 2002. Toxicological Profile for DDT/DDE/DDD (Update). Atlanta, GA: U.S. Department of Health and Human Services, Public Health Service.

Where can I get more information?

For more information, contact the Agency for Toxic Substances and Disease Registry, Division of Toxicology and Human Health Sciences, 1600 Clifton Road NE, Mailstop F-57, Atlanta, GA 30329-4027.

Phone: 1-800-232-4636

ToxFAQs™ Internet address via WWW is <http://www.atsdr.cdc.gov/toxfaqs/index.asp>.

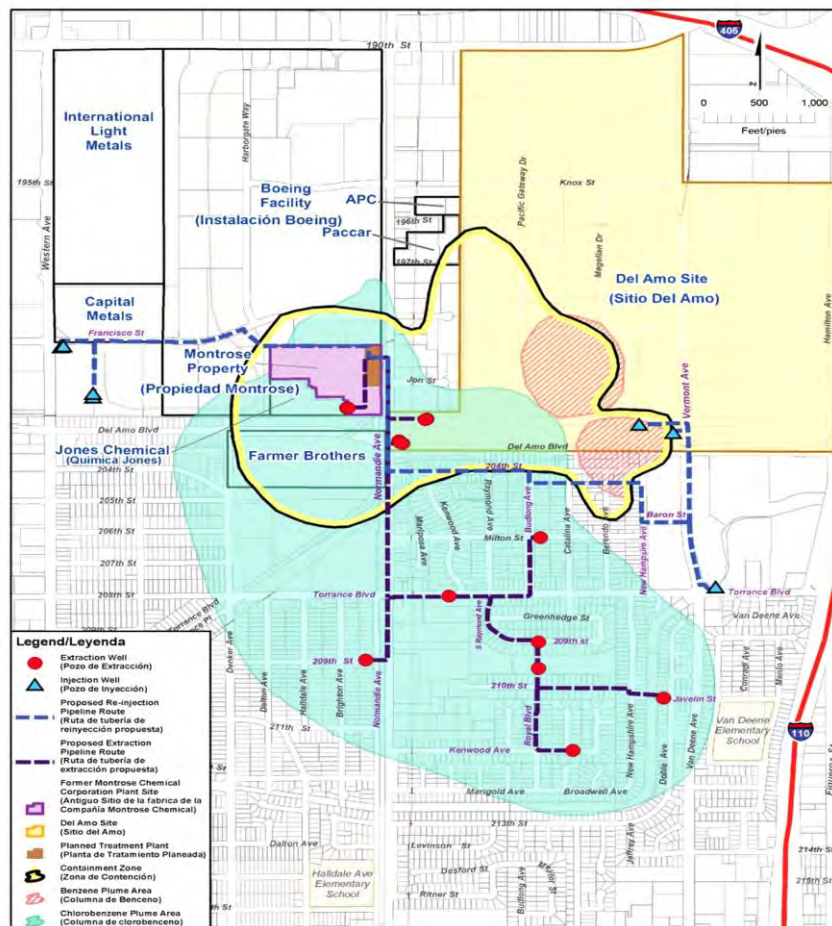
ATSDR can tell you where to find occupational and environmental health clinics. Their specialists can recognize, evaluate, and treat illnesses resulting from exposure to hazardous substances. You can also contact your community or state health or environmental quality department if you have any more questions or concerns.

February 2, 2015

The Office of Environmental Health Hazard Assessment (OEHHA) is identifying a public health protective concentration of 3 parts per million (ppm) for the chemical para-chlorobenzene sulfonic acid (pCBSA) in drinking water. pCBSA is a by-product of the production of dichloro-diphenyl-trichloroethane (DDT) and is often found in soil at former DDT manufacturing sites. pCBSA is highly water soluble and has contaminated aquifers beneath these sites.

A public health protective concentration is a health-based advisory level that OEHHA develops for a chemical in drinking water for which there is no public health goal or formal regulatory standard. Like a public health goal, a public health protective concentration is based on a risk assessment using the most current principles, practices and methods in the fields of toxicology, epidemiology and risk assessment. The susceptibility and exposure of infants and children is explicitly incorporated into the assessment. A public health protective concentration differs from a public health goal in that it does not undergo formal public review and comment, or an external scientific peer review.

Regulatory entities can use a public health protective concentration as guidance in their management of potential drinking water sources where the chemical may be present. Like a public health goal, a public health protective concentration is not a boundary line between a "safe" and "dangerous" level of a contaminant. Drinking water can still be considered acceptable for public consumption if it contains a chemical at a level exceeding the public health protective concentration.



What is lead?

Lead is a naturally occurring metal found in small amounts in the earth's crust. Lead can be found in all parts of our environment, including air, water and soil. Lead can exist in many different chemical forms.



Lead is used in the production of batteries, ammunition, and metal products (solder and pipes). Because of health concerns, use of lead in paints, ceramic products, caulking, and pipe solder has been dramatically reduced. The use of lead as an additive to automobile gasoline was banned in 1996 in the United States.

What happens to lead in the environment?

- Lead is an element and, therefore, it does not break down.
- When lead is released to the air, it may be transported long distances before it deposits onto the ground.
- Once deposited, lead often adheres to soil particles.
- Lead in soil can be transported into groundwater, but the amount of lead that moves into groundwater will depend on the chemical form of lead and soil type.

How can I be exposed to lead?

- Eating food or drinking water that contains lead. Water pipes in some older homes may contain lead solder which can leach into the water.
- Spending time in areas where lead-based paints have been used and are deteriorating. Deteriorating lead paint can form lead dust which can be ingested.
- Spending time in areas where the soil is contaminated with lead.
- Working in a job where lead is used or participating in certain hobbies in which lead is used, such as making stained glass.
- Using health-care products or folk remedies that contain lead.

Lead can affect almost every organ and system in your body

How can lead affect my health?

The effects of lead are the same whether it enters the body through inhalation or ingestion. Lead can affect almost every organ and system in your body. The nervous system is the main target for lead toxicity in adults and children. Long-term exposure can result in decreased learning, memory, and attention and weakness in fingers, wrists, or ankles. Lead exposure can cause anemia and damage to kidneys. It can also cause increases in blood pressure, particularly in middle-aged and older individuals. Exposure to high lead levels can severely damage the brain and kidneys and can cause death. In pregnant women, exposure to high levels of lead may cause a miscarriage. High-level exposure in men can damage reproductive organs.

Lead

How can lead affect children?

Children are more vulnerable to lead poisoning than adults because their nervous system is still developing. Children can be exposed to lead in their environment and prior to birth from lead in their mother's body. At lower levels of exposure, lead can decrease mental development, with effects on learning, intelligence and behavior. Physical growth may also be decreased. A child who swallows large amounts of lead may develop anemia, severe stomachache, muscle weakness, and brain damage. Exposure to lead during pregnancy can result in premature births. Some effects of lead may persist into adulthood.

Can lead cause cancer?

There have been several agencies and organizations both in the United States and internationally that have reviewed studies and made an assessment about whether lead can cause cancer.

- The Department of Health and Human Services (HHS) has determined that lead and lead compounds are reasonably anticipated to be human carcinogens
- The U.S. Environmental Protection Agency (EPA) has classified lead as a probable human carcinogen.
- The International Agency for Research on Cancer (IARC) has determined that inorganic lead is probably carcinogenic to humans, and that there is insufficient information to determine whether organic lead compounds will cause cancer in humans.

Can I get a medical test to check for lead?

A blood test is available to measure the amount of lead in your blood. Blood tests are commonly used to screen children for lead poisoning. Your doctor can draw blood samples and send them to appropriate laboratories for analysis.

How can I protect my family from lead exposure?

- Avoid exposure to sources of lead.
- Do not allow children to chew or mouth surfaces that may have been painted with lead-based paint.
- If your home contains lead-based paint or you live in an area contaminated with lead, wash children's hands and faces often to remove lead dusts and soil, and regularly clean the house of dust and tracked in soil.

Want more information?



Go to ATSDR's [Toxicological Profile for Lead](#)

CDC Lead Poisoning Prevention Program <https://www.cdc.gov/nceh/lead/default.htm>

Environmental Protection Agency <https://www.epa.gov/lead/protect-your-family-exposures-lead>

Call CDC-INFO at 1-800-232-4636, or submit your question online at <https://www.cdc.gov/dcs/ContactUs/Form>

Go to ATSDR's Toxic Substances Portal: <http://www.atsdr.cdc.gov/substances/index.asp>

If you have any more questions or concerns, you can also find & contact your ATSDR Regional Representative at http://www.atsdr.cdc.gov/DRO/dro_org.html

This fact sheet answers the most frequently asked health questions (FAQs) about trichloroethylene. For more information, call the ATSDR Information Center at 1-800-232-4636. This fact sheet is one in a series of summaries about hazardous substances and their health effects. It is important you understand this information because this substance may harm you. The effects of exposure to any hazardous substance depend on the dose, the duration, how you are exposed, personal traits and habits, and whether other chemicals are present.

HIGHLIGHTS: Trichloroethylene is used as a solvent for cleaning metal parts. Exposure to very high concentrations of trichloroethylene can cause dizziness, headaches, sleepiness, incoordination, confusion, nausea, unconsciousness, and even death. Trichloroethylene has been found in at least 1,051 of the 1,854 National Priorities List sites identified by the Environmental Protection Agency (EPA).

What is trichloroethylene?

Trichloroethylene is a colorless, volatile liquid. Liquid trichloroethylene evaporates quickly into the air. It is nonflammable and has a sweet odor.

The two major uses of trichloroethylene are as a solvent to remove grease from metal parts and as a chemical that is used to make other chemicals, especially the refrigerant, HFC-134a.

What happens to trichloroethylene when it enters the environment?

- Trichloroethylene can be released to air, water, and soil at places where it is produced or used.
- Trichloroethylene is broken down quickly in air.
- Trichloroethylene breaks down very slowly in soil and water and is removed mostly through evaporation to air.
- It is expected to remain in groundwater for long time since it is not able to evaporate.
- Trichloroethylene does not build up significantly in plants or animals.

How might I be exposed to trichloroethylene?

- Breathing trichloroethylene in contaminated air.
- Drinking contaminated water.
- Workers at facilities using this substance for metal degreasing are exposed to higher levels of trichloroethylene.
- If you live near such a facility or near a hazardous waste site containing trichloroethylene, you may also have higher exposure to this substance.

How can trichloroethylene affect my health?

Trichloroethylene was once used as an anesthetic for surgery. Exposure to moderate amounts of trichloroethylene may cause headaches, dizziness, and sleepiness; large amounts may cause coma and even death. Eating or breathing high levels of trichloroethylene may damage some of the nerves in the face. Exposure to high levels can also result in changes in the rhythm of the heartbeat, liver damage, and evidence of kidney damage. Skin contact with concentrated solutions of trichloroethylene can cause skin rashes. There is some evidence exposure to trichloroethylene in the work place may cause scleroderma (a systemic autoimmune disease) in some people. Some men occupationally-exposed to trichloroethylene and other chemicals showed decreases in sex drive, sperm quality, and reproductive hormone levels.

How likely is trichloroethylene to cause cancer?

There is strong evidence that trichloroethylene can cause kidney cancer in people and some evidence for trichloroethylene-induced liver cancer and malignant lymphoma. Lifetime exposure to trichloroethylene resulted in increased liver cancer in mice and increased kidney cancer and testicular cancer in rats.

The Department of Health and Human Services (DHHS) considers trichloroethylene to be a known human carcinogen. The International Agency for Research on Cancer (IARC) classified trichloroethylene as carcinogenic to humans. The EPA has characterized trichloroethylene as carcinogenic to humans by all routes of exposure.

Trichloroethylene

CAS # 79-01-6

How can trichloroethylene affect children?

It is not known whether children are more susceptible than adults to the effects of trichloroethylene.

Some human studies indicate that trichloroethylene may cause developmental effects such as spontaneous abortion, congenital heart defects, central nervous system defects, and small birth weight. However, these people were exposed to other chemicals as well.

In some animal studies, exposure to trichloroethylene during development caused decreases in body weight, increases in heart defects, changes to the developing nervous system, and effects on the immune system.

How can families reduce the risk of exposure to trichloroethylene?

- Avoid drinking water from sources that are known to be contaminated with trichloroethylene. Use bottled water if you have concerns about the presence of chemicals in your tap water. You may also contact local drinking water authorities and follow their advice.
- Prevent children from playing in dirt or eating dirt if you live near a waste site that has trichloroethylene.
- Trichloroethylene is used in many industrial products. Follow instructions on product labels to minimize exposure to trichloroethylene.

Is there a medical test to determine whether I've been exposed to trichloroethylene?

Trichloroethylene and its breakdown products (metabolites) can be measured in blood and urine. However, the detection of trichloroethylene or its metabolites cannot predict the kind of health effects that might develop from that exposure. Because trichloroethylene and its metabolites leave the body fairly rapidly, the tests need to be conducted within days after exposure.

Has the federal government made recommendations to protect human health?

The EPA set a maximum contaminant goal (MCL) of 0.005 milligrams per liter (mg/L; 5 ppb) as a national primary drinking standard for trichloroethylene.

The Occupational Safety and Health Administration (OSHA) set a permissible exposure limit (PEL) of 100 ppm for trichloroethylene in air averaged over an 8-hour work day, an acceptable ceiling concentration of 200 ppm provided the 8 hour PEL is not exceeded, and an acceptable maximum peak of 300 ppm for a maximum duration of 5 minutes in any 2 hours.

The National Institute for Occupational Safety and Health (NIOSH) considers trichloroethylene to be a potential occupational carcinogen and established a recommended exposure limit (REL) of 2 ppm (as a 60-minute ceiling) during its use as an anesthetic agent and 25 ppm (as a 10-hour TWA) during all other exposures.

Reference

This ToxFAQs™ information is taken from the 2019 Toxicological Profile for Trichloroethylene produced by the Agency for Toxic Substances and Disease Registry, Public Health Service, U.S. Department of Health and Human Services, Public Health Service in Atlanta, GA.

Where can I get more information?

For more information, contact the Agency for Toxic Substances and Disease Registry, Division of Toxicology and Human Health Sciences, 1600 Clifton Road NE, Mailstop F-57, Atlanta, GA 30329-4027.

Phone: 1-800-232-4636

ToxFAQs™ on the web: www.atsdr.cdc.gov/ToxFAQs

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