

## **II. Responses to Comments**

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### **A. Introduction**

Public Resources Code (PRC) Sections 21091(d) and 21092.5 and CEQA Guidelines Section 15088 govern the lead agency’s responses to comments on a Draft EIR. CEQA Guidelines Section 15088(a) states that “[T]he lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments that were received during the notice comment period and any extensions and may respond to late comments.” In accordance with these requirements, this section of the Final EIR provides the responses prepared by the City of Los Angeles Department of City Planning (City) to each of the written comments received regarding the Draft EIR.

Section II.B, Matrix of Comments Received on the Draft EIR, includes a table that summarizes the environmental issues raised by each commenter regarding the Draft EIR. Section II.C, Responses to Comments, provides the City’s responses to each of the written comments raised in the comment letters received on the Draft EIR. Copies of the original comment letters are provided in Appendix FEIR-1 of this Final EIR.

## II. Responses to Comments

### B. Matrix of Comments Received on the Draft EIR

Table II-1  
Matrix of Comments Received on the Draft EIR

Letter No.	Commenter	Executive Summary	Project Description	Environmental Setting	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Public Services—Libraries	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Utilities and Service Systems—Solid Waste	Utilities and Service Systems—Energy Infrastructure	Cumulative Impact	Alternatives	General/Other	CEQA	Mitigation Measures	Support	
<b>STATE AND REGIONAL</b>																																			
1	Miya Edmonson LDR/CEQA Branch Chief Caltrans District 7 100 S. Main St., Ste. 100 Los Angeles, CA 90012-3712		X																				X										X		
2	Sam Wang Program Supervisor, CEQA IGR Planning, Rule Develop. & Implementation SCAQMD 21865 Copley Dr. Diamond Bar, CA 91765-4178		X			X						X																					X	X	
<b>ORGANIZATIONS</b>																																			
3	David S. Osborne President District Council of Iron Workers of the State of California and Vicinity 3281 E. Guasti Rd., Ste. 625 Ontario, CA 91761-7643																																		X
4	Gabrieleño Administration Gabrieleño Band of Mission Indians—Kizh Nation P.O. Box 393 Covina, CA 91723-0393																							X										X	

Table II-1 (Continued)  
Matrix of Comments Received on the Draft EIR

Letter No.	Commenter	Executive Summary	Project Description	Environmental Setting	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Public Services—Libraries	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Utilities and Service Systems—Solid Waste	Utilities and Service Systems—Energy Infrastructure	Cumulative Impact	Alternatives	General/Other	CEQA	Mitigation Measures	Support		
5	Sophia Pina Gabrieleño Band of Mission Indians—Kizh Nation P.O. Box 393 Covina, CA 91723-0393  Andrew Salas Gabrieleño Band of Mission Indians—Kizh Nation P.O. Box 393 Covina, CA 91723-0393																							X										X		
6	Robert Corona Business Manager/Financial Secretary IBDW Local 11 297 N. Marengo Ave. Pasadena, CA 91101-1570																																			X
7	Keith Harkey Business Manager Ironworkers Local 433 17495 Hurley St. City of Industry, CA 91744-5106																																			X
8	Chad Maender President/CEO LAX Coastal Chamber of Commerce 9100 S. Sepulveda Blvd., Ste. 210 Los Angeles, CA 90045-4850																																			X
9	Frankie Jimenez Business Manager Reinforcing Ironworkers Local 416 13830 San Antonio Dr. Norwalk, CA 90650-4033																																			X
10	Albert Hernandez President SMART Local Union 105 2120 Auto Centre Dr. Glendora, CA 91740-6720																																			X

Table II-1 (Continued)  
Matrix of Comments Received on the Draft EIR

Letter No.	Commenter	Executive Summary	Project Description	Environmental Setting	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Public Services—Libraries	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Utilities and Service Systems—Solid Waste	Utilities and Service Systems—Energy Infrastructure	Cumulative Impact	Alternatives	General/Other	CEQA	Mitigation Measures	Support		
11	Jon P. Preciado Business Manager Southern California District Council of Laborers 1123 Parkview Dr., Ste. 300 Covina, CA 91724-3766																																			X
12	Greg Lewis Business Manager UA Plumbing and Piping Local 761 1305 N. Niagara St. Burbank, CA 91505-1925																																			X
<b>LATE LETTERS</b>																																				
13	Rowena Lau Division Manager Wastewater Engineering Services Division LA Sanitation and Environment 2714 Media Center Dr. Los Angeles, CA 90065-1733																								X											

## **II. Responses to Comments**

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### **C. Comment Letters**

#### **Comment Letter No. 1**

Miya Edmonson  
LDR/CEQA Branch Chief  
Caltrans District 7  
100 S. Main St., Ste. 100  
Los Angeles, CA 90012-3712

#### **Comment No. 1-1**

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Project would develop an industrial center with up to 435,390 square feet of industrial uses on an approximately 18-acre site with two development options.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. As a reminder, all environmental document should include Vehicle Miles Traveled. You may reference the Governor's Office of Planning and Research (OPR) for more information:

<https://opr.ca.gov/ceqa/#guidelines-updates>

#### **Response to Comment No. 1-1**

This introductory comment, which summarizes the Project and identifies VMT as the primary metric for identifying transportation impacts, is noted for the record and will be made available to the decision-makers for their review and consideration.

#### **Comment No. 1-2**

The Project would implement the following project design feature related to transportation:

**Project Design Feature TR-PDF-1:** A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval prior to commencing construction.

**Project Design Feature TR-PDF-2:** Under Option 1, the existing traffic signal at the northwestern corner of the Project Site on Interceptor Street would be modified to incorporate the Project driveway to limit potential impediments to traffic flow from trucks exiting the Project Site.

The Project site features a 7-foot sidewalk on Interceptor Street, an 8-foot sidewalk on Airport Boulevard, and an 8.5-foot landscaped and shaded sidewalk on Arbor Vitae Street. Protected Class IV bike lanes are available on both sides of Airport Boulevard. We agree that no significant conflicts would arise.

There are multiple transit stops within walking distance of the Project site. Adjacent to the Project site, at the intersection of Airport Boulevard & Arbor Vitae Street/Westchester Parkway, bus stops are provided for Metro Local 40 (OWL Route), 102 and 117 and Culver CityBus 6. The Project Site is also located within 0.50 miles of the LAX/Metro transit Center, which provides stops for the Metro C and K Lines as well as numerous bus lines. Furthermore, as previously detailed, transit projects in the Project area would provide additional transit capacity in the Project Area. Therefore, we concur that the Project would not place a significant strain on Transit capacity and would not lead to the degradation of transit facilities or significantly intensify use of transit facilities.

The Project is anticipated to result in an overall net decrease of 1,500 daily vehicle trips and a net decrease of 9,118 daily VMT for Option 1 and net decrease of 1,712 daily vehicle trips and a net decrease of 10,737 daily VMT. Therefore, neither Option 1 nor Option 2 of the Project would meet the thresholds of 250 daily trips or a net increase in daily VMT that would require further VMT analysis. Therefore, we concur that “no impacts would occur.”

From Table IV.I-6, Project trip Volumes Added to Off-Ramps of IV.I Transportation of the DEIR, the Project would add fewer than 25 trips to the freeway off-ramp analyzed in both the morning and afternoon peak hours. Therefore, no further freeway off-ramp queuing analysis is required.

### **Response to Comment No. 1-2**

This comment summarizes the project design features proposed under the Project as well as the Project’s transportation impacts during project operations. Caltrans concurs that no significant traffic impacts would occur. This comment is noted for the record and will be made available to the decision-makers for their review and consideration.

**Comment No. 1-3**

Any transportation of heavy construction equipment and/or materials that require the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. Any large-size truck trips be limited to off-peak commute periods for the construction phase and operation phase. Construction truck loads should be covered with a tarpaulin cover. Storm water run-off is a sensitive issue for Los Angeles County. Please be mindful that projects should be designed to discharge clean run-off water.

**Response to Comment No. 1-3**

The Project would comply with all local and State requirements regarding the use of oversized vehicles, including obtaining required permits. As discussed in Section IV.I, Transportation, of the Draft EIR, a Construction Traffic Management Plan would be prepared prior to the start of construction as part of Project Design Feature TR-PDF-1, which would include scheduling of construction-related haul trips outside of the commuter peak hours to the extent feasible. Furthermore, as discussed in Section IV.B, Air Quality, construction activities associated with the Project would comply with applicable regulatory standards related to construction trucks securing or covering truck loads when traveling on public roads, including South Coast Air Quality Management District (SCAQMD) Rule 403.

With respect to stormwater run-off during construction, as discussed in the Initial Study prepared for the Project, included as Appendix A of the Draft EIR, the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Construction stormwater permit. In accordance with the requirements of this permit, the Project would implement a site-specific Stormwater Pollution Prevention Plan (SWPPP) that specifies Best Management Practices (BMP) and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the City of Los Angeles Municipal Code [LAMC]) that require necessary measures, plans, and inspections to reduce sedimentation and erosion.

**Comment No. 1-4**

If you have any questions, please feel free to contact Mr. Alan Lin, the project coordinator, at (213) 269-1124 and refer to GTS # LA-2024-04944-DEIR.

**Response to Comment No. 1-4**

This concluding comment, which identifies the project coordinator, is noted for the record and will be made available to the decision-makers for their review and consideration. This concluding comment does not raise any issues with respect to the adequacy of the Draft EIR, and no further response is necessary.

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## **Comment Letter No. 2**

Sam Wang  
Program Supervisor, CEQA IGR  
Planning, Rule Develop. & Implementation  
SCAQMD  
21865 Copley Dr.  
Diamond Bar, CA 91765-4178

### **Comment No. 2-1**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Los Angeles is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

#### **Summary of Proposed Project Information in the DEIR**

Based on the DEIR, the Proposed Project would demolish approximately 37,860 square feet of existing commercial/industrial uses and associated parking to develop an industrial center on an approximately 18-acre site, with up to 435,390 square feet of industrial uses. The project would also include up to 10,000 square feet of refrigerated warehousing space, with approximately eight trucks equipped with TRUs. A review of aerial imagery indicates that the nearest sensitive receptor, residential uses, is located approximately 80 feet north of the Project Site, across Interceptor Street. Construction is anticipated to begin in 2026 and continue for approximately 17 months. Two development options are proposed:

Option 1: A single building with up to 355,390 square feet of warehouse space and 80,000 square feet of ancillary office space, totaling 435,390 square feet of floor area, with a maximum height of 50 feet. This option includes 90 truck trailer parking spaces, 274 passenger vehicle parking spaces, and approximately 93,100 square feet of landscaped area. It is estimated that Option 1 would generate 585 truck trips per day during operation.

Option 2: Three buildings with up to 320,056 square feet of warehouse space and 90,000 square feet of ancillary office space, totaling 410,056 square feet of floor area, with a maximum height of 46 feet. This option includes 369 passenger vehicle parking spaces and approximately 120,400 square feet of landscaped area. It is estimated that Option 2 would generate 527 truck trips per day during operation.

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**Response to Comment No. 2-1**

This comment serves as an introduction to the commenter's letter regarding the Draft EIR for the Project and summarizes the Project Description (Section II, Project Description, of the Draft EIR). Specific comments regarding the Draft EIR are addressed below.

**Comment No. 2-2****South Coast AQMD Comments***Assessment of TRU Idling Durations and Potential Health Impacts from the Proposed Project Site*

Based on South Coast AQMD reviews of the modeling files and information provided in Appendix C of the DEIR, the duration for on-site TRU truck idling in the Proposed Project site is assumed to be 15 minutes. According to the California Air Resource Board (CARB)'s Proposed Amendments to the Airborne Toxic Control Measure (ATCM) for In-Use Diesel-Fueled TRUs, a TRU-equipped vehicle enters the facility fully loaded (inbound) and exits the facility fully loaded (outbound), with each loading and unloading process taking 2 hours, totaling up to 4 hours. Given this, the loading and unloading of goods during a single visit can result in up to 4 hours of idling on-site. The 15-minute assumption for the TRU idling duration is not supported by substantial evidence and likely underestimated the potential exposure of nearby residents to diesel exhaust emissions, which could pose a significant cancer risk to the community. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the Project's HRA to reflect a reasonable TRU idling duration supported by substantial evidence.

**Response to Comment No. 2-2**

As discussed in the Air Quality section of the Draft EIR, the Project would implement Project Design Feature AIR-PDF-4 which requires electrical hookups for all loading bays. Based on the California Air Resources Board Airborne Traffic Control Measures (CARB ATCM) idling limits of 5 minutes, the TRUs are assumed 15 minutes of total idling per truck (e.g., 5 minutes entering, 5 minutes on-site, and 5 minutes exiting) for past warehouse projects. Given the short onsite truck travel route, ingress/egress access, and configuration of the Project, use of 15 minutes would be considered conservative. The electrical hookups would provide trucks access to electrical power and avoid unnecessary idling to power TRUs or climate control equipment. Therefore, the assumption of a 15-minute idling period for TRUs would be considered conservative for the estimation of idling emissions and is appropriate for the analysis.

**Comment No. 2-3***Enforceability of Composite Haul Truck Assumptions*

Appendix C of the DEIR identifies Vulcan Irwindale Landfill (approximately 30 miles from the Project site) and SoilClean Adelanto Landfill (approximately 99 miles from the Project site)<sup>1</sup> as the disposal facilities that would serve the Proposed Project. The DEIR further assumes that no more than 10 percent of the daily haul trucks would travel to the SoilClean Adelanto Landfill and uses a composite haul-truck mileage assumption in its analysis based on this distribution. However, the DEIR does not identify any enforceable mechanism to ensure compliance with this 10 percent limitation on daily trips.

To maintain the consistency between the impact analysis and the Project implementation, South Coast AQMD staff recommends that the Lead Agency include this limitation as a project design feature or mitigation measure.

<sup>1</sup> DEIR-Appendix C-1.2-Air Quality Worksheets.

**Response to Comment No. 2-3**

As discussed on Page IV.F-25 in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, removal of subsurface features (e.g., contaminated soils) is identified as an interim remediation project and all ground disturbance activities will be completed prior to, and independent of the Project. Thus, potential contaminated soils, which would require the transport to the SoilClean Adelanto Landfill, would not be encountered during the Project's proposed grading activities. Thus the air quality analysis could have assumed all export would be transported to Vulcan Irwindale Landfill (30 miles from the Project Site) as the contaminated soil will have already been disposed of prior to the start of the Project's construction activities. Nonetheless, the air quality analysis conservatively assumed a contingency of 10 percent of the total export could potentially be transported as contaminated soil to SoilClean Adelanto Landfill (99 miles from the Project Site). Furthermore, export of soil would be limited to approximately 1,460 cubic yards for Option 1 and 485 cubic yards for Option 2. Please also note that maximum daily construction emissions for all pollutants are well below the SCAQMD regional thresholds (See Table IV.B-6 of the Draft EIR). As shown therein, the closest pollutant to exceeding a SCAQMD regional significance threshold is NO<sub>x</sub>. Impacts during grading activities show that Option 1 and Option 2 NO<sub>x</sub> emissions are 54 percent and 38 percent below the SCAQMD NO<sub>x</sub> threshold, respectively. For these reasons, including an enforceable mechanism to ensure compliance with this 10 percent limitation on daily trips is not necessary to enforce the arguably overly conservative assumption.

**Comment No. 2-4***Underestimation of Ground-Level Pollutants Near Buildings in Health Risk Assessment (HRA) for Option 2 of the Proposed Project*

South Coast AQMD staff's review of the modeling files noted that buildings under Option 2 were not included in the building downwash analysis in the AERMOD dispersion model for operation HRA which may result in an underestimation of the ground-level pollutant concentrations near the buildings. Thus, the Lead Agency is recommended to: 1) include all buildings in the building downwash analysis for Option 2 to analyze more accurate ground-level concentrations; and 2) present the revised HRA results in the Final EIR.

*Health Risk Assessment Recalculation and Emission Reductions from Health Risk Strategies*

According to the DEIR, the maximum off-site individual cancer risk is reported as 8.3 in one million under Option 1 and 5.6 in one million under Option 2 for residences located directly east of the Project site. However, based on South Coast AQMD staff's screening-level calculations and re-assessment using the actual emission rates, the maximum off-site individual cancer risk may exceed South Coast AQMD's significance threshold of 10 in one million and could reasonably fall within a range above 10 and potentially exceeding 20 in one million if including the building downwash effects for both Option 1 and Option 2.

**Response to Comment No. 2-4**

Within the AERMOD modeling for the Project, the majority of emissions sources include volume sources with point sources only at the loading bays. As discussed in Response to Comment 2-2, the Project would include electrical hookups at all loading bays to prevent unnecessary idling. The AERMOD model was rerun with building downwash (accounting for all buildings under Option 2) and health risk was recalculated. Results show that while health risk increases slightly, cancer, chronic and acute risk values remain below SCAQMD significance thresholds. Cancer risk for Option 1 and Option 2 would increase from 5.6 to 6.2 in a million and 8.3 to 9.4 in a million, respectively. There would be no change to the Project's Air Quality impacts, and impacts would remain less than significant.

**Comment No. 2-5**

Therefore, South Coast AQMD's staff recommends that Lead Agency incorporate the following mitigation measures and project design considerations and reevaluate the health risk assessment using correct and revised analyses into the Final EIR:

## Mobile Sources

1. Require zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

Note: Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available to use.

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

Note: South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

3. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
4. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

## Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays.
2. Use light-colored paving and roofing materials.
3. Utilize only Energy Star heating, cooling, and lighting devices and appliances.

## Design Considerations for Reducing Air Quality and Health Risk Impacts

1. Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
2. Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.

3. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.
4. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
5. Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporating additional mitigation measures as applicable to the Proposed Project in the Final EIR:

1. State of California—Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act<sup>2</sup>
2. South Coast AQMD 2022 Air Quality Management Plan,<sup>3</sup> specifically:
  - a) Appendix IV-A—South Coast AQMD’s Stationary and Mobile Source Control Measures
  - b) Appendix IV-B—CARB’s Strategy for South Coast
  - c) Appendix IV-C—SCAG’s Regional Transportation Strategy and Control Measure
3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution—Environmental Justice and Transportation.<sup>4</sup>

<sup>2</sup> State of California—Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Available at: <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>.

<sup>3</sup> South Coast AQMD, 2022 Air Quality Management Plan (AQMP). Available at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>.

<sup>4</sup> United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution—Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution>.

### **Response to Comment No. 2-5**

The Draft EIR concluded on Page 74, that the Project would result in a less than significant impact without mitigation measures and with the implementation of Project Design Features AIR-PDF-2 through PDF-4, with regard to health risk during Project operations. In addition, Tables IV.B-7 and IV.B-8 of the Draft EIR show that regional criteria pollutant emissions during Project operations would remain below significance thresholds. Also

shown in Table IV.B-10, localized pollutant concentrations resulting from Project operations would remain below ambient air quality standards. As discussed in Response to Comment No. 2-4, the confirmatory analysis demonstrates that health risk impacts would remain below SCAQMD significance thresholds. Refer to Appendix FEIR-2 for AERMOD and HARP output files related to the confirmatory analysis.

### **Comment No. 2-6**

#### *South Coast AQMD Air Permits and Role as a Responsible Agency*

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., one or more air permits from South Coast AQMD will be required. The Final EIR should include a discussion about the South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201—Permit to Construct,<sup>5</sup> Rule 203—Permit to Operate,<sup>6</sup> Rule 401—Visible Emissions,<sup>7</sup> Rule 402—Nuisance,<sup>8</sup> Rule 403—Fugitive Dust,<sup>9</sup> Rule 1110.2—Emissions from Gaseous and Liquid Fueled Engines,<sup>10</sup> Rule 1113—Architectural Coatings,<sup>11</sup> Rule 1166—Volatile Organic Compound Emissions from Decontamination of Soil,<sup>12</sup> Rule 1466—Control of Particulate Emissions from Soils with Toxic Air Contaminants,<sup>13</sup> and Rule 1470—Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,<sup>14</sup> etc.

It is important to note that if air permits from the South Coast AQMD are required, South Coast AQMD's role under CEQA will become the Responsible Agency of the Proposed Project. Per CEQA Guidelines Section 15086, the Lead Agency is required to consult with South Coast AQMD. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Also, as set forth in CEQA Guidelines Section 15096(h), the Responsible Agency is required to make Findings in accordance with CEQA Guidelines Section 15091 for each significant effect of the project and issue a Statement of Overriding Considerations in accordance with CEQA Guidelines Section 15093, if necessary. Lastly, as set forth in CEQA Guidelines Section 15096(i), the Responsible Agency may file a Notice of Determination.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could

have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

- <sup>5</sup> South Coast AQMD, Rule 201 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>
- <sup>6</sup> South Coast AQMD, Rule 203 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>
- <sup>7</sup> South Coast AQMD, Rule 401 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>
- <sup>8</sup> South Coast AQMD, Rule 402 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>
- <sup>9</sup> South Coast AQMD, Rule 403 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>
- <sup>10</sup> South Coast AQMD, Rule 1110.2 available at [https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110\\_2.pdf](https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf)
- <sup>11</sup> South Coast AQMD, Rule 1113 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>
- <sup>12</sup> South Coast AQMD, Rule 1166 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>
- <sup>13</sup> South Coast AQMD, Rule 1466 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>
- <sup>14</sup> South Coast AQMD, Rule 1470 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

### **Response to Comment No. 2-6**

The SCAQMD is referred to page IV.B-19 in Section IV.B, Air Quality, of the Draft EIR, which provides a list of SCAQMD rules and regulations applicable to land use development projects (including this Project). Rule 1113—Architectural Coatings, Rule 1146.2—Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and

Process Heaters and Rule 1470—Requirements for Stationary Diesel-Fueled Internal Combustion Ignition Engines are included in this list.

As shown in Appendix C, the Project would include one emergency generator with EPA Tier 4 emissions compliant controls. As the generator would be Tier 4 emissions compliant, the Project would comply with SCAQMD Rule 1470 emissions limits. SCAQMD Rule 1470 is applicable to the Project which requires a permit to construct under SCAQMD Rule 201 prior to installation of the generators at the Project Site. Once the generator is constructed/installed, a permit to operate is required under SCAQMD Rule 203.

Further, please refer to Section IV.F, Hazards and Hazardous Materials, of the Draft EIR for a detailed discussion of SCAQMD Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil). Specifically, the Soils Management Plan in Mitigation Measure HAZ-MM-1 on page IV.F-35 of the Draft EIR requires the plan to be executed in accordance with SCAQMD Rule 1166. A detailed description of SCAQMD Rule 1166 requirements is discussed therein.

CEQA Guidelines Section 15381 defines “responsible agency” as “a public agency which proposes to carry out or approve a project, for which a lead agency is preparing or has prepared an EIR or negative declaration. For the purposes of CEQA, the term ‘responsible agency’ includes all public agencies other than the lead agency which have discretionary approval power over the project.” On May 5, 2026, City staff met with SCAQMD to discuss the Project. SCAQMD raised concerns regarding the Project’s Limited Industrial land use designation, specifically what uses could be permitted under the designation during operation of the Project. City staff acknowledged while the Limited Industrial land use designation does permit a range of uses, including enclosed auto repair uses, spray booths, limited retail etc., as the Project EIR did not analyze such uses, the use would not be permitted to operate on-site under the Project. In addition, City staff has responded to SCAQMD’s concerns in a letter, in which the Project’s construction equipment and phasing was confirmed, as well as the proposed operational uses, all of which were analyzed in Section IV.B, Air Quality, of the Project’s Draft EIR.

As described above, a list of SCAQMD rules and regulations applicable to land use development projects (including this Project) is provided on page IV.B-19 in Section IV.B, Air Quality, of the Draft EIR. The Project will comply with all applicable SCAQMD rules and regulations, including those associated with emergency generators. However, none of the SCAQMD permits required for the Project are expected to be discretionary. In particular, the emergency generator would not be expected to operate for more than 200 hours and the engine would be of a type that would be certified by SCAQMD. There would be no change to the Project’s Air Quality impacts, and impacts would remain less than significant.

**Comment No. 2-7****Conclusion**

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jivar Afshar, Air Quality Specialist, at [jafshar@aqmd.gov](mailto:jafshar@aqmd.gov) should you have any questions.

**Response to Comment No. 2-7**

The City has coordinated with SCAQMD regarding its comments on the Draft EIR. As requested, the City's responses to SCAQMD's comments will be sent to the SCAQMD as part of this Final EIR distribution prior to certification of this Final EIR. The City, in making the findings for the Project, will comply with the requirements of CEQA Guidelines Section 15091. As noted in the responses above, all of the SCAQMD's comments have been fully addressed and the conclusions in the Draft EIR have been confirmed.

**Comment Letter No. 3**

David S. Osborne  
President  
District Council of Iron Workers of the State of California and Vicinity  
3281 E. Guasti Rd., Ste. 625  
Ontario, CA 91761-7643

**Comment No. 3-1**

On behalf of District Council of Ironworkers of California and Vicinity (“DCIW”), I respectfully add our organization’s name to the list of supporters for the 9000 Airport Project.

After further reviewing this project, DCIW is satisfied that the project will maximize community, economic, and employment benefits; and protect worker health and safety. In particular, the Applicant’s commitment to hiring from a pool of responsible contractors and local hire will ensure that skilled and trained local construction workers who build the project will be paid living wages, work in a safe worksite, and receive good benefits for their work. In doing so, the Applicant has demonstrated an overriding commitment to helping the local economy remain robust.

Therefore, we request that the City Planning Commission approve all requested entitlements to make this safe and timely project a reality. Thank you for your time and consideration.

**Response to Comment No. 3-1**

This comment expressing support for the Project is noted for the record and will be made available to the decision-makers for their review and consideration.

**Comment Letter No. 4**

Gabrieleño Administration  
Gabrieleño Band of Mission Indians—Kizh Nation  
P.O. Box 393  
Covina, CA 91723-0393

**Comment No. 4-1**

Thank you for your correspondence dated October 27, 2025. The Tribe must respectfully object to the City's position, which reflects fundamental misapplications of CEQA, AB 52, and controlling provisions of the Public Resources Code.

The City's assertion that no "substantial evidence of an existing Tribal Cultural Resource within the Project area" has been provided fundamentally misapplies CEQA's evidentiary standard. PRC §21074(a)(1) explicitly defines a TCR as a site, feature, place, cultural landscape, or sacred place with cultural value to a California Native American tribe. Under PRC §21074(b), substantial evidence includes tribal knowledge, oral history, and ethnographic documentation and not merely physical artifacts.

The City's demand for "evidence that considers the specific location of the Project Site" imposes an unlawful evidentiary burden. CEQA does not require tribes to conduct subsurface archaeological investigations or prove the exact location of buried resources to establish sensitivity. Such a standard would render AB 52 consultation meaningless, as it would effectively require physical disturbance. This contradicts the preventative purpose of CEQA and PRC §21084.3.

The City's October 27 correspondence constitutes an unlawful unilateral closure of consultation. PRC §21080.3.2(c) requires that if the lead agency determines that proposed mitigation measures will not avoid or substantially lessen significant impacts. In fact, implementing the City's generic inadvertent discovery condition will cause detrimental harm because it allows ground disturbance to proceed without tribal monitors present, guaranteeing that culturally sensitive resources will be damaged or destroyed before detection. Once TCRs are disturbed by construction equipment, they cannot be restored to their original context, resulting in irreparable loss of archaeological integrity and cultural information. The City cannot reject tribe-specific mitigation measures by simply asserting "no substantial evidence" and defaulting to a generic condition.

Furthermore, generic conditions that allow any tribe to participate in inadvertent discovery protocols directly contradict AB 52's consultation framework, which recognizes the authority of consulting tribes who timely requested consultation and provided substantial evidence. The City cannot circumvent its legal obligations by adopting a one-size-fits-all approach that

disregards the Kizh Nation's status as lineal descendants and lead consulting tribe. The Tribe's submitted mitigation measures already contain comprehensive, enforceable protocols for inadvertent discoveries that comply with CEQA, AB 52, PRC §5097.98, and Health & Safety Code §7050.5.

The Tribe therefore demands immediate reopening of consultation to comply with PRC §21080.3.2(b)–(c) procedures and a pause on the project's Draft EIR release until consultation requirements are satisfied and mandatory findings are properly documented.

The Kizh Nation remains committed to good faith consultation and ensuring compliance with state law. However, we cannot accept a consultation process that misapplies legal standards, imposes unlawful evidentiary burdens, and substitutes generic conditions for the tribe-specific protections required under CEQA and AB 52.

We look forward to your response and to continuing consultation in accordance with statutory requirements.

#### **Response to Comment No. 4-1**

As discussed in Section IV.J, Tribal Cultural Resources, of the Draft EIR, pursuant to Assembly Bill (AB) 52 and in compliance with Public Resources Code 21080.3.1, the City provided formal notification of the Project to nine California Native American tribes that requested notification on August 6, 2024. One response to the Project notification was received from the Gabrieleño Band of Mission Indians—Kizh Nation (hereafter referred to as the Kizh Nation). On October 18, 2024, an administrative specialist with the Kizh Nation emailed a response to the City's notification letter requesting consultation exclusively through written correspondence. The email summarizes regulations related to the provisions of AB 52 and presents information that the Kizh Nation used to support their conclusion that there is sensitivity for a tribal cultural resource at the Project Site and that adverse impacts from the Project are likely to occur. All materials submitted as part of tribal consultation to-date were reviewed to determine if there is sufficient evidence for a known tribal cultural resource to exist within the Project Site. The information contained in the documents submitted by the Kizh Nation is limited to a regional focus—the Los Angeles Basin and traditional Gabrielino territory—and lacks adequate detail and analysis of the Project Site. The information on the Native American land-uses and traditional practices helps to convey that previously unidentified resources can occur essentially anywhere within the Los Angeles Basin. However, as previously discussed, given the level of mechanical alterations that have occurred to sediments within the Project Site and the age of the naturally deposited sediments beneath the altered surface stratum, there is no evidence identified to-date suggesting that there is an increased likelihood for a such a resource to be preserved within the Project Site. Thus, further evidence is needed to link the contextual information submitted during the consultation with the existing conditions of the Project Site to substantiate the

claim that a tribal cultural resource is present or highly likely to be preserved below the surface, such that the requested mitigation measures are necessary. The AB 52 consultation process was formally closed by the City on October 7, 2025.

Nonetheless, as discussed in Section IV.J, Tribal Cultural Resources, of the Draft EIR, since the Project would require excavation to an anticipated maximum depth of approximately 10 feet below the ground surface, the likelihood of encountering a tribal cultural resource during Project construction and the potential for an inadvertent discovery cannot be fully ruled out based on the available evidence. The City has established a standard condition of approval (COA) to address the inadvertent discovery of a tribal cultural resource. Should tribal cultural resources be inadvertently encountered, this condition of approval provides for temporarily halting construction activities near the encounter and notifying the City and Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the Project. If the City determines that the potential resource appears to be a tribal cultural resource (as defined by PRC Section 21074), the City would provide any affected tribe a reasonable period of time to conduct a site visit and make recommendations regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources. The Project Applicant would then implement the tribe's recommendations if a qualified archaeologist reasonably concludes that the tribe's recommendations are reasonable and feasible. The recommendations would then be incorporated into a tribal cultural resources monitoring plan and, once the plan is approved by the City, ground disturbance activities could resume. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements. Implementation of this COA would ensure that any potential Project impacts on any currently unknown tribal cultural resources that may be present at the Project Site would be less than significant.

**Comment Letter No. 5**

Sophia Pina  
Gabrieleño Band of Mission Indians—Kizh Nation  
P.O. Box 393  
Covina, CA 91723-0393

Andrew Salas  
Gabrieleño Band of Mission Indians—Kizh Nation  
P.O. Box 393  
Covina, CA 91723-0393

**Comment No. 5-1**

Thank you for your recent correspondence and for acknowledging receipt of our November 3rd letter. We appreciate the City's continued communication on the 9000 Airport Project.

At this time, we respectfully request clarification on one essential point, will the City be implementing the Kizh Nation's proposed mitigation measures for this project?

As the consulting Tribe, and the only consulting tribe, under AB 52 and the lineal descendants of the project area, our mitigation measures were submitted in accordance with Public Resources Code §§21074, 21080.3.1–21080.3.2, and 21084.3, and constitute substantial evidence under CEQA. We remain concerned that the City's reliance on a generic inadvertent discovery condition does not satisfy the statutory requirement for tribe-specific and mutually agreed-upon mitigation. For reference, CEQA and AB 52 clearly define substantial evidence to include:

- Tribal oral history, traditional knowledge, and expert testimony (PRC §21074(b));
- Ethnographic, historical, and cultural landscape documentation; and
- Relevant information and reasonable inferences that support sensitivity determinations (CEQA Guidelines §15384(a)).

CEQA does not require tribes to provide physical artifacts from the exact project site to establish a Tribal Cultural Resource, nor does it allow the imposition of an evidentiary burden that would require subsurface disturbance in order to validate sensitivity. Given this framework, and to ensure the record is accurate moving forward, we respectfully request the City confirm whether our mitigation measures will be adopted, or whether the City intends to rely solely on its standard condition of approval.

**In addition, we believe it would be beneficial to convene a meeting between the City's staff and legal counsel and the Kizh Nation, together with our legal counsel, to discuss these issues directly and work toward a mutually acceptable path forward.** Please provide a few dates and times when you and your counsel would be available, and we will coordinate on our end.

Thank you, and we look forward to your response.

**Response to Comment No. 5-1**

Refer to Response to Comment No. 4-1 for details regarding the Project's consultation process and its compliance with AB 52 requirements.

**Comment Letter No. 6**

Robert Corona  
Business Manager/Financial Secretary  
IBDW Local 11  
297 N. Marengo Ave.  
Pasadena, CA 91101-1570

**Comment No. 6-1**

On behalf of the International Brotherhood of Electrical Workers (IBEW) Local Union 11, I respectfully add our organization's name to the list of supporters for the 9000 Airport Project.

After further reviewing this project, IBEW Local 11 is satisfied that the project will maximize community, economic, and employment benefits and protect worker health and safety. In particular, the Applicant's commitment to hiring from a pool of responsible contractors and local hire will ensure that skilled and trained local construction workers who build the project will be paid living wages, work in a safe worksite, and receive good benefits for their work. In doing so, the Applicant has demonstrated an overriding commitment to helping the local economy remain robust.

Therefore, we request that the City Planning Commission approve all requested entitlements to make this safe and timely project a reality. Thank you for your time and consideration.

**Response to Comment No. 6-1**

This comment expressing support for the Project is noted for the record and will be made available to the decision-makers for their review and consideration.

**Comment Letter No. 7**

Keith Harkey  
Business Manager  
Ironworkers Local 433  
17495 Hurley St.  
City of Industry, CA 91744-5106

**Comment No. 7-1**

On behalf of Ironworkers Local 433, I respectfully add our organization's name to the list of supporters for the 9000 Airport Project.

After further reviewing this project, Local 433 is satisfied that the project will maximize community, economic, and employment benefits and protect worker health and safety. In particular, the Applicant's commitment to hiring from a pool of responsible contractors and local hire will ensure that the skilled and trained local construction workers who build the project will be paid living wages, work in a safe worksite, and receive good benefits for their work. In doing so, the Applicant has demonstrated an overriding commitment to helping the local economy remain robust.

Therefore, we request that the City Planning Commission approve all requested entitlements to make this safe and timely project a reality. Thank you for your time and consideration.

**Response to Comment No. 7-1**

This comment expressing support for the Project is noted for the record and will be made available to the decision-makers for their review and consideration.

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**Comment Letter No. 8**

Chad Maender  
President/CEO  
LAX Coastal Chamber of Commerce  
9100 S. Sepulveda Blvd., Ste. 210  
Los Angeles, CA 90045-4850

**Comment No. 8-1**

On behalf of the LAX Coastal Chamber of Commerce, I am pleased to provide notification that the Chamber supports the above-referenced industrial project at 9000 Airport Blvd.

The Chamber Public Policy Committee was provided with a full presentation on this project by the applicant, Rexford Industrial, on November 26, 2025, at which time the committee recommended support for the project. Subsequently, on December 11, 2025, the Executive Committee of the LAX Coastal Chamber of Commerce voted unanimously to support the project as presented.

This project is a significant development for the greater Westchester area at the corner of Arbor Vitae and Airport. The site spans over 18 acres and currently houses Hertz Rent-a-car LAX operations, which will be moving into the newly built CONRAC Facility within the next year.

The project has been thoughtfully designed with two alternative schemes to allow for the construction of an industrial facility that meets market demand. The Chamber appreciates the applicant's early and persistent outreach to Westchester stakeholders, its collaboration with the Chamber, Neighborhood Council, and Council office, and Rexford's ongoing commitment to the Westchester community. It is this engagement philosophy and coordination that ensures projects like this are both beneficial to market demands and consistent with community needs.

Rexford designed this project to meet existing zoning. The applicant is not seeking any deviations from the code, nor does the project create any significant and unavoidable impacts. In fact, the project's design is elevated, with significant landscaping. The buildings are oriented to buffer operational noise away from the residential neighborhood to the east and the north. And, we appreciate the attention Rexford pays to include environmental and sustainability elements in the design. It is not often that the Chamber has an industrial developer as committed to environmental design as Rexford, with its commitment to building this 400,000 sf. industrial facility to LEED Gold standard.

Again, the Coastal LAX Chamber of Commerce is pleased to fully and unequivocally support Rexford Industrial's 9000 Airport Blvd. project. We look forward to the City proceeding with its final project review and its swift approval.

**Response to Comment No. 8-1**

This comment expressing support for the Project is noted for the record and will be made available to the decision-makers for their review and consideration.

**Comment Letter No. 9**

Frankie Jimenez  
Business Manager  
Reinforcing Ironworkers Local 416  
13830 San Antonio Dr.  
Norwalk, CA 90650-4033

**Comment No. 9-1**

On behalf of Reinforcing Ironworkers Local 416, I respectfully add our organization's name to the list of supporters for the 9000 Airport Project.

After further reviewing this project, Local 416 is satisfied that the project will maximize community, economic, and employment benefits and protect worker health and safety. In particular, the Applicant's commitment to hiring from a pool of responsible contractors and local hire will ensure that skilled and trained local construction workers who build the project will be paid living wages, work in a safe worksite, and receive good benefits for their work. In doing so, the Applicant has demonstrated an overriding commitment to helping the local economy remain robust.

Therefore, we request that the City Planning Commission approve all requested entitlements to make this safe and timely project a reality. Thank you for your time and consideration.

**Response to Comment No. 9-1**

This comment expressing support for the Project is noted for the record and will be made available to the decision-makers for their review and consideration.

**Comment Letter No. 10**

Albert Hernandez  
President  
SMART Local Union 105  
2120 Auto Centre Dr.  
Glendora, CA 91740-6720

**Comment No. 10-1**

On behalf of the Sheet Metal, Air, Rail, Transportation Workers Local Union No. 105 (“SMART Local Union 105”), I respectfully add our organizations name to the list of supporters for the 9000 Airport Project.

After further reviewing this project, SMART Local Union 105 is satisfied that the project will maximize community, economic, and employment benefits and protect workers’ health and safety. In particular, the Applicants commitment to hiring from a pool of responsible contractors and local hire will ensure that skilled and trained local construction workers who build the project will be paid living wages, work in a safe worksite, and receive good benefits for their work. In doing so, the Applicant has demonstrated an overriding commitment to helping the local economy remain robust.

Therefore, we request that the City Planning Commission approve all requested entitlements to make this safe and timely project a reality. Thank you for your time and consideration.

**Response to Comment No. 10-1**

This comment expressing support for the Project is noted for the record and will be made available to the decision-makers for their review and consideration.

**Comment Letter No. 11**

Jon P. Preciado  
Business Manager  
Southern California District Council of Laborers  
1123 Parkview Dr., Ste. 300  
Covina, CA 91724-3766

**Comment No. 11-1**

On behalf of our over 33,800 members and ten affiliated local unions throughout Southern California, I write to relay our support for the Draft EIR on the 9000 Airport Drive project proposed by Rexford Industrial.

If the EIR is approved and the project moves forward, Rexford Industrial has committed to contracting with one of our signatory general contractors for this project and therefore, the project will provide good paying, family sustaining wages and provide first rate benefits to our members who will build this project. Additionally, many of our members live in the city of Los Angeles and in the surrounding cities in Los Angeles county and would enjoy nothing more than being able to work locally and spend locally, as well as being able to spend more time at home after work rather than spending that time commuting to points unknown for work outside of Los Angeles and Los Angeles County.

For all the reasons stated above, we support the Draft EIR for this project. Thank you for your consideration in this matter.

**Response to Comment No. 11-1**

This comment expressing support for the Project is noted for the record and will be made available to the decision-makers for their review and consideration.

**Comment Letter No. 12**

Greg Lewis  
Business Manager  
UA Plumbing and Piping Local 761  
1305 N. Niagara St.  
Burbank, CA 91505-1925

**Comment No. 12-1**

On behalf of United Association Plumbers and Fitters Local 761, I respectfully add our organization's name to the list of supporters for the 9000 Airport Project.

After further reviewing this project, UA Local 761 is satisfied that the project will maximize community, economic, and employment benefits and protect worker health and safety. In particular, the Applicant's commitment to hiring from a pool of responsible contractors and local hire will ensure that the skilled and trained local construction workers who build the project will be paid living wages, work in a safe worksite, and receive good benefits for their work. In doing so, the Applicant has demonstrated an overriding commitment to helping the local economy remain robust.

Therefore, we request that the City Planning Commission approve all requested entitlements to make this safe and timely project a reality. Thank you for your time and consideration.

**Response to Comment No. 12-1**

This comment expressing support for the Project is noted for the record and will be made available to the decision-makers for their review and consideration.

**Comment Letter No. 13**

Rowena Lau  
Division Manager  
Wastewater Engineering Services Division  
LA Sanitation and Environment  
2714 Media Center Dr.  
Los Angeles, CA 90065-1733

**Comment No. 13-1**

This is in response to the Notice of Completion & Notice of Availability of Draft Environment Impact Report that LA Sanitation and Environment's (LASAN) Wastewater Engineering Services Division (WESD) received on December 8, 2025. The notice regarded the actions taken by Los Angeles City Planning for the 435,390 square feet of industrial uses on an approximately 18-acre site located at 9000–9160 S. Airport Blvd.

LASAN has received and logged the notification. Upon review, there were no changes to the project and the previous response is valid. Please notify our office in the instance that additional environmental review is necessary for this project.

If you have any questions, please contact Brett Perry at [brett.perry@lacity.org](mailto:brett.perry@lacity.org).

**Response to Comment No. 13-1**

This comment confirms that the Notice of Completion and Availability of the Draft EIR was received by the LA Sanitation and Environment (LASAN) and provides a point of contact that will be included on future public mailings for the Project. The comment also notes that LASAN reviewed the Draft EIR and that their previous response is valid. This comment is noted for the record and will be made available to the decision-makers for their review and consideration.