



Edwin Grover <edwin.grover@lacity.org>

Re: Council File Number 16-1411-S1 - Please grant the appeal of the South Central Farmers and deny the FEIR for 4051 S. Alameda, the PIMA project - Case No. AA-2012-919-PMLA CEQA No. ENV-2012-920-EIR

Jeff Smith <jeff@soundartla.org>

Sun, Mar 19, 2017 at 3:38 PM

To: plum.committee@lacity.org, edwin.grover@lacity.org, zina.cheng@lacity.org, sharon.dickinson@lacity.org

Dear Chair Huizar and Members Cedillo, Harris-Dawson, Price and Englander:

We oppose the FEIR for the parcel at 4015 S. Alameda, submitted by the PIMA Corporation (Case No. AA-2012-919-PMLA CEQA No. ENV-2012-920-EIR) because of the following deficiencies:

1. The Final EIR does not address the lack of data for the applicant's claim that their operation would result in only 75 proposed truck trips per day, most of them being small and medium trucks, with only 31 being diesel (down from 264 truck trips proposed by the previous project, despite a larger operational footprint with the new plans). There are no studies nor statistics to back up this new lower, arbitrarily estimated, and unenforceable number. The applicant states that the current number of truck trips for their operation is 33, but, again, there are no verifiable data to support this.
(See Dr. Tom Williams' report, sent to your committee on 2-16-2017.)

2. The final EIR increases the Project's number of truck docks from 22 to 30. When these docks are utilized at maximum capacity production ("worst case scenario"), they would result in far more than 75 truck trips per day. Additionally, the FEIR states that most of the 75 trucks would be small and medium trucks, yet 18 of the 30 loading docks are designed to accommodate long, multiple axle trucks, which must be assumed to be diesel trucks. This increase in number of the loading docks, including large docks, will most likely increase the Project's estimated truck traffic, including an increase in diesel trucks as well as small and medium trucks. These potential and likely increases are not reflected in the traffic impact analysis or health risk analysis, thus understating the Project's impacts.
(See Dr. Tom Williams' report, sent to your committee on 2-16-2017.)

3. Because of the inadequate truck trip analysis and unenforceable projections and an understatement of impacts related to the number of employees, truck and delivery traffic and air emissions, the actual impacts on air quality cannot be truly known. The health risk assessment vastly understates the Project's health impacts with regard to diesel particulate matter generation and must be revised. A new air quality analysis must be done, based on a more accurate truck trip analysis.

(See Dr. Tom Williams' report, sent to your committee on 2-16-17.)

4. The Final EIR did not consider the submitted alternative to create a community food hub, proposed by the South Central Farmers. This alternative addresses the community's needs for green space, "project objectives" of local job creation, and access points for local, healthy, fresh produce to enter South Central LA and the larger LA community. The City has an opportunity to show civic leadership and political will by facilitating this community based solution in creating green, sustainable jobs that serve both the local community and the region in an area that is historically underserved in open space per capita.

5. The Final EIR does not follow the City of LA's policies, as outlined in its "Open Space and Conservation Element".

For example, policy 6.1.1 states, "Consider appropriate methodologies to protect significant remaining open spaces." Policy 6.1.6 states, "Consider preservation of private land open space to the maximum extent feasible. In areas where open space values determine the character of the community, development should occur with special consideration of these characteristics." A methodology to protect the parcel in question could be to use Quimby funds to acquire it, or negotiate with a land trust entity. As an undeveloped 13 acre parcel, it is a significant remaining open space. The character of the community was undeniably expressed when the South Central Farm operated between 1992 and 2006 and should be re-established, per this policy.

Policy 6.4.2 states, "Encourage increases in parks and other open space lands where deficiencies exist, such as South East and South Central Los Angeles and neighborhoods developed prior to the adoption of the State Quimby Act in 1965." Re-establishment of a community farm/food hub would directly address this deficiency in a specifically named part of the City.

Policy 6.4.7 states, "Consider as part of the City's open space inventory of pedestrian streets, community gardens, which are accessible to the public, even though such elements fall outside the conventional definitions of 'open space.' This will help

address the open space and outdoor recreation needs of communities that are currently deficient in these resources.”

A community farm/food hub may not be considered “conventional” yet this policy directs the City to not exclude it from consideration if it would address stated deficiencies.

In conclusion, please grant the appeal by the South Central Farmers and deny the FEIR for the PIMÁ Project.

Thank you,

Jeffrey Smith
Co-Executive Director
Sound Art
soundartla.org
Los Angeles, CA