

09/30/2022

VIA EMAIL ONLY

Megan Taggart, Planning Manager
Department of Economic and Community Development
City of Palmdale
38250 Sierra Highway
Palmdale, CA 93550
mtaggart@cityofpalmdale.org

RE: NOP Comments for Site Plan Review 22-012 Project

Dear Ms. Taggart,

On behalf of **Coalition for Responsible Equitable Economic Development ("CREED LA")** thank you for the opportunity to provide comments on the Notice of Preparation ("NOP") for environmental review of the Site Plan Review 22-012 project (the "Project").

The Project applicant proposes a 384,800 square foot industrial building and associated site improvements on property located south of Rancho Vista Blvd between Sierra Highway and 8th Street East. The Initial Study ("IS") identifies the Project's potentially significant impacts under CEQA to include all impacts except Agriculture and Forestry, Land Use/Planning, Mineral Resource, Population/ Housing, and Recreation.

CREED LA respectfully requests, under CEQA complete analysis of these impacts, imposition of all feasible mitigation and study of a reasonable range of alternatives to the Project.

General Comments

We have some concerns related to warehouse development that we would like to ensure are addressed as part of the EIR process.

1. Industrial warehouse projects typically include 24 hours a day, 7 days a week operation in day and night shifts. The DEIR should include a Project Alternative that restricts operations to fewer hours.
2. Although the tenant or planned operations are usually unknown at this stage of development, the DEIR should reflect a good faith effort at full disclosure by including as much

information on the nature of operations as can be reasonably obtained. In addition, the DEIR should clearly articulate and quantify all proposed future uses of the Project. This is important because different types of high cube warehouses have different levels of environmental impacts.

3. It is important to establish whether the proposed warehouse will include cold storage. If cold storage is included, then the DEIR should analyze the impacts of transportation refrigeration units (TRUs) on the environment during Project operation.

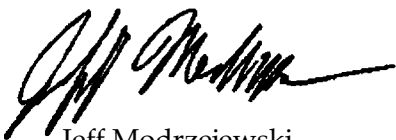
4. Goods movement industry is one of the major contributors of air pollutants across Southern California. Warehouse operations including trips by heavy duty trucks and cargo handling equipment (like forklifts, tractors) and even backup generators contribute to local pollution and global climate change. There is also overwhelming evidence that warehouse operations have a significant negative impact on public health due to the particulate pollution. Therefore, every effort should be made to ensure that air pollution and public health impacts are studied, quantified, and fully mitigated.

5. We request that the City make every effort to mitigate all impacts to the fullest extent feasible. This includes adopting mitigation measures from other jurisdictions such as the Fontana Warehouse Ordinance. The ordinance includes measures such as requiring a buffer zone with large drought-resistant trees, plug-in system for trucks with TRUs, zero emission motorized operational equipment, 10% EV parking, and solar panels for non-refrigerated uses. Mitigation measures can also include requirements to install cool roofs to reduce operational energy demand, and solar canopies on the parking lot to generate energy.

Thank you for the opportunity to submit NOP comments. Again, CREED LA respectfully requests under CEQA full analysis of the environmental impacts, feasible mitigation, and reasonable alternatives to the Project.

We look forward to reviewing and commenting on the DEIR. Please provide all sources and referenced materials when the DEIR is made available.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Modrzejewski", with a long horizontal flourish extending to the right.

Jeff Modrzejewski
Executive Director