

November 30, 2023

The following is a response from Adkan Engineers to the July 12, 2022, and August 8, 2022, comment letters submitted by Southwest Regional Council of Carpenters (“SWRCC”) regarding the Amazing 34 Distribution Center Project (“Project”). The two letters were submitted before City Planning Commission hearings on the Project that were continued. The letters are nearly identical in content. We are providing this response for the administrative record.

Responses to Comments:

1. **Comment: The Southwest Carpenters incorporates by reference all comments raising issues regarding the Environmental Impact Report (EIR) submitted prior to certification of the EIR for the Project.**

Response: SWRCC incorrectly states that an Environmental Impact Report was prepared for the Project (Page 2). A draft Initial Study/Mitigated Negative Declaration (“MND”) was prepared and circulated for public review. SWRCC did not submit any comments on the draft MND before the close of the public comment period.

2. **Comment: SWRCC requests any notices related to the Project under CEQA and the Planning and Zoning Law (Page 2).**

Response: SWRCC is included on the City’s notice list for the Project.

3. **Comment: SWRCC requests the City require the use of a “local skilled and trained workforce” for economic and environmental reasons, including reduced greenhouse gas emissions and vehicle miles traveled (Pages 2-5).**

Response: Exhibit A is a letter from SWAPE (dated March 8, 2021) in support of these general claims, which neither specifically addresses the Project nor the draft MND prepared for the Project. The SWAPE letter was prepared before the MND was circulated for public review.

The City acknowledges SWRCC’s preference for local hire. A project’s economic and social effects are not treated as effects on the environment under CEQA. (14 Cal. Code Regs., § 21100, subd. (d).) Impacts within the purview of CEQA must be related to a physical change. (14 Cal. Code Regs., § 15358, subd. (b).) An economic or social change, by itself, is not considered a significant effect on the environment. (14 Cal. Code Regs., §§15131, 15382.)

As explained further in Section 8 of the MND, the Project would not result in a significant impact related to greenhouse gas emissions, and therefore no mitigation is required under CEQA. The MND is supported by the Air Quality and Greenhouse Gas Emissions Impact Analysis, dated September 15, 2021, in Appendix A to the MND. The MND

includes an analysis of mobile sources, including emissions from employee, vendor and haul truck vehicle trips (see also Section 7.0 of Appendix A).

Thus, no changes to the MND are warranted. Even so, it is anticipated that local contractors and workers will be retained for the construction phase of the Project, and most employment opportunities at the Project would be filled by existing residents in the region. In addition, the applicant will comply with all employment and labor laws and regulations.

Sincerely,

Adkan Engineers