



MAJESTIC REALTY CO.

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April 7, 2010

Mr. Steven John, Director
Southern California Field Office
United States Environmental Protection Agency
600 Wilshire Boulevard, Suite 1460
Los Angeles, CA 90017

Dear Steven:

Thank you for the opportunity to meet with you regarding the Health Impact Assessment Scoping proposal. Majestic Realty Co. is a 62 year old Southern California-based real estate development company with more than 70 million square feet in our portfolio. We have offices around the United States and our portfolio includes industrial, office, and retail as well as sports, entertainment and hospitality projects. Our core competency is the development of large scale, master planned business parks, many of which include warehouse/distribution facilities. Thus we are active participants in the various infrastructure and goods movement task forces and also the San Pedro Bay Ports Clean Air Action Plan joint mayor's task force. In 2009, we were part of the team that was recognized with an U.S. EPA Environmental Justice Achievement Award for our work on the clean truck program. On a number of different fronts, we work diligently to help find effective solutions for building sustainable, balanced communities.

While we were not included in the list of invitees to the initial meeting, we are clearly long-term stakeholders in our communities. We are not certain what criterion was used to select the invitees, nor are we clear as to how the list of participants was determined. From our perspective, it seemed to be a moving target and clearly lacking balanced representation. Also with a sole source process, we question whether or not adequate due diligence was completed prior to authorizing this contract. We did, however, appreciate the opportunity to discuss this HIA concept and proposed process with you and your team although we still do not clearly understand EPA's objective for an HIA.

Given the depth of the current CEQA requirements, we are still uncertain as to what might be gained through the suggested HIA process. Also, the current health risk assessments are scientifically based, while the proposed HIA does not appear to be based upon any scientific approach, nor does it contain filters to control for other externalities that may not have any connection to the project evaluation.

It is our understanding that the EPA will be circulating a draft document in April. We look forward to gaining a better understanding what the goal for this process might be. We will be happy to work together with your organization once we get a better understanding of the objective.

Sincerely,

MAJESTIC REALTY CO.

Fran Inman
Senior Vice President

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