



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA E-MAIL AND USPS:

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[alejandro.huerta@lacity.org](mailto:alejandro.huerta@lacity.org)

Alejandro Huerta, Environmental Review Coordinator  
City of Los Angeles – Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

## **Draft Environmental Impact Report (Draft EIR) for the Proposed Crossroads Hollywood Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the Final EIR.

### Project Description and Air Quality Analysis

The Lead Agency proposes to demolish the existing structures and construct 950 residential units, 308 hotel rooms, 95,000 square feet of office uses, and 185,000 square feet of commercial uses. Construction is expected to occur over five years. The Lead Agency found that the proposed project would exceed SCAQMD's regional CEQA significance thresholds for NO<sub>x</sub> during construction and ROG and NO<sub>x</sub> during operation. After incorporating Mitigation Measure B-1 through B-5<sup>1</sup>, the Lead Agency found that the proposed project's construction air quality impacts would remain significant and unavoidable. Additionally, after incorporating Mitigation Measure L-1 and Project Design Features C-1 through C-3<sup>2</sup>, the Lead Agency found that the proposed project's operational impacts would remain significant and unavoidable.

### SCAQMD's 2016 Air Quality Management Plan

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board of Directors on March 23<sup>rd</sup>. The 2016 AQMP<sup>3</sup> is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin (Basin). Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and lays out the challenges facing the Basin. The most significant air quality challenge in the Basin is to reduce an additional 45 percent reduction in nitrogen oxide (NO<sub>x</sub>) emissions in 2023 and an additional 55 percent reduction in NO<sub>x</sub> emissions beyond 2031 levels for ozone attainment.

Achieving NO<sub>x</sub> emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable. Therefore, SCAQMD staff recommends additional mitigation measures to further reduce construction and operational emissions, particularly from NO<sub>x</sub>. Please see the attachment for more information.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the certification

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<sup>1</sup> Page IV.B-56

<sup>2</sup> Page IV.B-56

<sup>3</sup> South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>

of the Final EIR. Further, when the Lead Agency makes the finding that the recommended mitigation measures are infeasible, the Lead Agency shall describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:JC

LAC170511-03

Control Number

**ATTACHMENT****Additional Mitigation Measures to Further Reduce Construction and Operational NOx Emissions**

1. CEQA requires that all feasible mitigation measures go beyond what is required by law to minimize any significant impacts. To further reduce the significant construction and operational impacts from NOx emissions, SCAQMD staff recommends the following mitigation measures that the Lead Agency should include in the Final EIR. Additional information on potential mitigation measures as guidance to the Lead Agency is available on the SCAQMD CEQA Air Quality Handbook website<sup>4</sup>.

**Construction Mitigation Measures**

2. Require the use of 2010 model year diesel haul trucks that conform to 2010 EPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export), and if the Lead Agency determines that 2010 model year or newer diesel haul trucks cannot be obtained, the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc. during the five-year construction period.
3. Require all off-road construction equipment with a horsepower (HP) greater than 50 be USEPA certified Tier 4 interim engines or engines that are certified to meet or exceed the emission ratings for USEPA Tier 4 engines. In the event that all construction equipment cannot meet the Tier 4 engine certification, the applicant must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative measures may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the proposed project, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.

**Operational Mitigation Measures**

4. Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the project site to generate solar energy for the facility.
5. Use light colored paving and roofing materials.
6. Install light colored “cool” roofs and cool pavements.
7. Limit parking supply and unbundle parking costs. Lower parking supply below the Institute of Transportation Engineers (ITE) rates and separate parking costs from property costs.
8. Require use of electric lawn mowers and leaf blowers.

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<sup>4</sup> South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.