South Coast
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SENT VIA E-MAIL AND USPS: January 30, 2019

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Draft Environmental Impact Report (Draft EIR) for the Proposed Hollywood Community Plan Update (SCH No.: 2016041093)

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.

SCAQMD Staff's Summary of Project Description

The Lead Agency is proposing updates to the existing Hollywood Community Plan's land use policies, land use map, and zoning ordinances based on an increase in forecasted population growth as well as the development and adoption of a Community Plan Implementation Overlay District (Proposed Project). The Proposed Project contains 13,962 acres or 21.8 square miles, and it is one of 35 community plans that comprise the Land Use Element of the City of Los Angeles' General Plan. Projected residential and non-residential developments would include a net increase of 10,620 dwelling units and 850,357 square feet of non-residential uses from the existing plan approved in 2012[1]. The Proposed Project, once adopted, will guide the land use objectives, future decision-making, and comprehensive vision of the Hollywood Community through the year 2040. The Proposed Project is located southwest of the State Route 134 (SR-134) and Interstate 5 (I-5) junction, and it is intersected by State Route 101 (SR-101).

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational air quality emissions and compared those emissions to SCAQMD's regional and localized air quality CEQA significance thresholds. The Lead Agency found that the Proposed Project would result in significant and unavoidable air quality impacts for criteria pollutants NOx, PM10, and PM2.5 during construction, and VOC emissions during operation, after the implementation of mitigation measure (MM) AQ-1. MM AQ-1 requires construction contractors to employ the use of Tier 4 off-road diesel-powered construction equipment and/or best available control technology (BACT) retrofits that achieve Tier 3 emissions reductions at a minimum, where available[2]. Additionally, MM AQ-1 requires construction contractors to use electricity from power poles instead of diesel-fueled equipment, use pre-painted materials, and minimize the traffic impact from haul trucks[3]. The Lead Agency also identified a net decrease of 2,763 pounds/day (lbs/day) of NOx during operation under the Proposed Project in the year 2040[4].

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)[5], which was later approved by the California Air Resources Board on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin (Basin). The most significant air quality

[1] DEIR. Appendix F, *Air Quality*. Page 2.
[2] DEIR. Section 2, *Summary*. Page 2-9 through 2-11.
[3] *Ibid.*
[4] *Ibid.* Section 4, *Air Quality*. Table 4.3-10. Page 4.3-25.
[5] 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.

challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment.

General Comments

Upon a review of the Draft EIR, SCAQMD staff found that the Air Quality Analysis used a 2016 static baseline to determine the level of significance for the full buildout scenario in the year 2040. SCAQMD staff is concerned with this methodology because it may have mischaracterized the Proposed Project as an emissions reductions project while the Proposed Project is expected to result in a net increase in development activities from the approved 2012 Hollywood Community Plan. Therefore, the use of a static baseline may have led to an underestimation of operational emissions, especially from NOx, and is misleading to the public and decision makers. SCAQMD staff recommends the use of a future floating baseline to determine the level of significance for the Proposed Project's air quality impacts. Please see the attachment for more information.

As described in the 2016 AQMP, achieving NOx emissions 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 attaining the ozone NAAQS as expeditiously as practicable. If, upon revision of the Air Quality Analysis, the Lead Agency finds that operation of the Proposed Project will result in significant air quality impacts, especially from NOx emissions, adoption of all feasible mitigation measures will be required pursuant to CEQA Guidelines Section 15126.4. Additional details are provided in the attachment.

Closing

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Further, when the Lead Agency makes the finding that the recommended mitigation measures are not feasible, the Lead Agency should 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 Robert Dalbeck, Assistant Air Quality Specialist, CEQA- IGR Section, at (909) 396-2139 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:RD
LAC181120-08
Control Number

ATTACHMENT

Air Quality Impact Analysis – CEQA Baseline

1. The Draft EIR should include a realistic baseline which accurately reflects the improvements in air quality that will occur, independent of the Proposed Project. The Lead Agency chose a CEQA baseline year of 2016 (existing conditions) to determine the level of significance for the Proposed Project's operational air quality impacts from criteria pollutants. The Lead Agency found that the Proposed Project would result in emissions reductions in all of the criteria pollutants, except VOC when the Proposed Project's operational air quality impacts in 2040 were compared to those in 2016 (Figure 1). For example, operation of the Proposed Project would result in NOx emissions reduction of 2,763 pounds/day (lbs/day) in 2040. This methodology of using a comparison between the Proposed Project's air quality impacts in future year (using emission rates from 2040) and a 2016 baseline (using emission rates from 2016) inappropriately credits the Proposed Project with emissions reductions that will occur independent of the Proposed Project due to adopted state and federal rules and regulations, as well as advancement in cleaner vehicles, equipment technology, and alternative fuels that will be implemented during the lifetime of the Proposed Project. As shown in Figure 1, the use of the 2016 baseline comparison masks the emission increases from the Proposed Project with emissions reductions that would have been achieved due to state and federal rules and regulations, independent of the Proposed Project. Therefore, comparing the Proposed Project's future operational emissions in 2040 to the 2016 CEQA baseline to quantify the Proposed Project's long-term operational air quality impacts may have led to an under-estimation of the Proposed Project's true air quality impacts. For example, when comparing the future emissions in 2040 with the Proposed Project [e.g., Proposed Plan (2040)] and those in 2040 without the Proposed Project [e.g., Future (2040) No Project/Existing Plan], the net increase of NOx would be 121 lbs/day (1,852 lbs/day minus 1,731 lbs/day), which would have been considered a significant air quality impact based on SCAQMD's regional CEQA air quality significance threshold of 55 lbs/day of NOx during operation.

Figure 1: SCAQMD Staff's Screenshot of Table 4.3-10: Estimated Project Area Regional Operational Emissions

TABLE 4.3-10: ESTIMATED PROJECT AREA REGIONAL OPERATIONAL EMISSIONS

Scenario	Daily Emissions (Pounds per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
EXISTING CONDITIONS						
Mobile Sources	822	4,112	20,333	53	677	304
Area Sources	3,375	503	261	3	40	40
Total	**4,197**	**4,615**	**20,594**	**56**	**717**	**344**
FUTURE (2040) NO PROJECT/EXISTING PLAN						
Mobile Sources	292	1,134	5,892	31	634	260
Area Sources	4,091	597	303	4	48	48
Total	**4,383**	**1,731**	**6,195**	**35**	**682**	**308**
PROPOSED PLAN (2040)						
Mobile Sources (Treatment Option 2/a/)	305	1,217	6,109	34	658	269
Area Sources	4,364	635	317	4	51	51
Total	**4,669**	**1,852**	**6,426**	**38**	**709**	**320**
NET DAILY EMISSIONS/b/						
Change from Existing Conditions	***472***	***(-2,763)***	***(-14,168)***	***(-18)***	***(-8)***	***(-24)***
SCAQMD Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	**Yes**	**No**	**No**	**No**	**No**	**No**
SCAQMD Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	Yes	Yes	No	No	No	No

/a/ Mobile source emissions presented are those quantified under Treatment Option 2, as this condition is more conservation and assumes a greater number of daily VMT.
/b/ Net emissions refer to the difference in emissions between Proposed Plan and existing conditions; Negative values expressed in parentheses.
SOURCE: TAHA, 2018.

SOURCE: SCAQMD. January 25, 2019.

In *Neighbors for Smart Rail v. Exposition Metro Line Construction* (2013) 57 Cal.4th 439, the California Supreme Court held that using a future baseline is proper in some cases. "[N]othing in CEQA law precludes an agency … from considering both types of baseline—existing and future conditions—in its primary analysis of the project's significant adverse effects." (*Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 454.). "Even when a project is intended and expected to improve conditions in the long term--20 or 30 years after an EIR is prepared--decision makers and members of the public are entitled under CEQA to know the short- and medium-term environmental costs of achieving that desirable improvement. … [¶] … The public and decision makers are entitled to the most accurate information on project impacts practically possible, and the choice of a baseline must reflect that goal." (See also *Communities for a Better Environment v. South Coast Air Quality Management Dist*. (2010) 48 Cal.4th 310).

The purpose of CEQA is to disclose environmental impacts from the Proposed Project to the public and decision makers in order to provide the public and decision makers with the actual changes to the environment from the activities involved in the Proposed Project. By taking credit for future emissions reductions from existing air quality rules, regulations, and emissions reductions technology, the Lead Agency may have underestimated the true air quality impacts from VOCs, NOx, PM10, and PM2.5 emissions attributable to the Proposed Project's activities. Therefore, SCAQMD staff recommends that the Lead Agency revise the air quality analysis to include a comparison between the operational emissions in year 2025, year 2030, and year 2035 with the Proposed Project and the operational emissions in the same respective years without the Proposed Project, and use this analysis to determine the level of significance (i.e. air quality impacts based on the changes in activities due to the Proposed Project). In the event that the Lead Agency finds, after revisions to the air quality analysis, that the Proposed Project would have significant air quality impacts during operation for any of the years analyzed, feasible mitigation measures will be required pursuant to CEQA Guidelines Section 15126.4. For more information on suggested potential mitigation measures as guidance to the Lead Agency, please see Comment No. 7 below and/or visit SCAQMD's CEQA Air Quality Handbook website[6].

Air Quality Impact Analysis – Interim Milestone Years

2. The Draft EIR analyzed the Proposed Project's operational emissions in the year 2040. By 2040, the Proposed Project is assumed to be fully built based on the projections. Although the Proposed Project may not be at peak capacity in earlier years, higher emission rates from vehicles, trucks, and equipment in earlier years may result in higher peak daily emissions in early phases of the Proposed Project. Emission rates of vehicles, trucks, and equipment are generally higher in earlier years as more stringent emission standards and technologies have not been fully implemented, and fleets have not fully turned over. Therefore, SCAQMD staff recommends that the Lead Agency include interim milestone years (i.e., year 2025, year 2030, and year 2035) in the Air Quality Analysis to ensure the peak daily emissions are identified and adequately disclosed in the Final EIR. The interim milestone years will also assist in the demonstration of air quality improvements and progress throughout the lifetime of the Proposed Project from the implementation of air quality-related mitigation measures and Proposed Project designs and policies discussed in the Draft EIR.

Air Quality Impact Analysis – Overlapping Construction and Operational Impacts

3. When specific development is reasonably foreseeable as a result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential significant adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated.

[6] South Coast Air Quality Management District. Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.

Based on a review of the Air Quality Analysis, SCAQMD staff found that the Lead Agency did not analyze construction activities overlapping with operational activities. Since implementation of the Proposed Project is expected to occur over a multi-year timeframe through the year 2040[7], an overlapping construction and operation scenario is reasonably foreseeable, unless the Proposed Project includes requirement(s) that will avoid overlapping construction and operational activities. To properly analyze a worst-case impact scenario that is reasonably foreseeable at the time the Draft EIR is prepared, SCAQMD staff recommends that the Lead Agency revise the Air Quality Analysis to identify the overlapping years, combine construction emissions (including emissions from demolition) with operational emissions, and compare the combined emissions to SCAQMD's air quality CEQA *operational* thresholds of significance to determine the level of significance in the Final EIR. In the event that the Lead Agency, after revising the Air Quality Analysis, finds that the Proposed Project's air quality impacts would be significant, feasible mitigation measures will be required pursuant to CEQA Guidelines Section 15126.4. For more information on suggested potential mitigation measures as guidance to the Lead Agency, please see Comment No. 7 below and/or visit SCAQMD's CEQA Air Quality Handbook website[8].

Air Quality Impact Analysis – Health Risk Assessment (HRA)

4. SCAQMD staff is concerned that the Lead Agency has not substantiated the less than significant finding regarding the exposure of sensitive receptors to toxic air contaminants (TAC) during operation of the Proposed Project. The Lead Agency supported this finding by requiring that future development projects within the Proposed Project area would comply with existing regulations such as the City of Los Angeles' Clean Up Green Up Ordinance and Public Resources Code 21151.8 which requires assessment of hazardous pollutants within 0.25 miles of a new elementary or secondary school[9].

   One of the basic CEQA policies is to inform government decision makers and the public about the potential significant environmental effects of proposed activities (CEQA Guidelines Section 15002(a)(1)). A finding that the Proposed Project's health impacts are less than significant is appropriate if the finding is supported by substantial evidence in the record. Here, the Lead Agency has not conducted the HRA analysis for the Proposed Project. There is no quantitative analysis on how elements of the Proposed Project and future projects will *reduce* health impacts to less than significant (*emphasis added)*. As such, there is no substantial evidence in the record to support the Lead Agency's finding that the Proposed Project's health impacts would be less than significant. On the other hand, based on a review of the traffic volume data, SCAQMD staff found that the portion of SR-101 intersecting the Proposed Project (between Post Miles 5.554 and 7.84) had an annual average daily traffic (AADT) of up to 269,000, including 7,919 to 10,869 heavy-duty truck trips per day in 2016[10]. Heavy-duty trucks traveling on SR-101 are sources of diesel particulate matter (DPM) to sensitive receptors (e.g., residents) living in close proximity[11]. Since the intersection contains residentially zoned land uses, residents living in close proximity to SR-101 would be exposed to DPM, which has been identified by the California Air Resources Board as a TAC based on its carcinogenic effects[12]. While the Los Angeles Municipal Code (LAMC) Section 99.04.504.6 requires installation of air filters rated at a Minimum Efficiency Reporting Value (MERV) of 13 or better for sensitive receptors within 1,000 feet of a freeway, SCAQMD staff recommends that the Lead Agency consider the health impacts on future residents living within the

[7] *Ibid.*
[8] South Coast Air Quality Management District. Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.
[9] Draft EIR. Section 4, *Air Quality*. Page 4.3-31.
[10] California Department of Transportation. Caltrans Traffic Volume Data for 2016. Route 101, Post mile 9.221. Accessed at: http://www.dot.ca.gov/trafficops/census/.
[11] DEIR. Section 3.0, *Project Description*, Figure 3-4, Page 3-20.
[12] California Air Resources Board. August 27, 1998. Resolution 98-35. Accessed at: http://www.arb.ca.gov/regact/diesltac/diesltac.htm.

Proposed Project by performing a mobile source HRA[13] to disclose the potential health risks in the Final EIR[14]. This will serve as substantial evidence to support the less than significant finding, facilitate the purpose and goal of CEQA on public disclosure, and enable decision-makers with meaningful information to make an informed decision on project approval. This will also foster informed public participation by providing the public with information that is needed to understand the potential health risks from living in close proximity to freeways.

Alternatively, the Lead Agency should include a new air quality mitigation measure requiring the preparation of a project-level HRA analysis to be submitted to the City of Los Angeles Planning Department prior to design review approval for development proposals for new residential uses in the Proposed Project area within 1,000 feet of SR 101. Inclusion of this mitigation measure in the Final EIR demonstrates that the Lead Agency has adequately considered the Proposed Project's health impacts at the plan-level and that a project-level HRA analysis will be completed at a later stage to facilitate the disclosure of health impacts to prospective residents.

Additional Considerations for Sensitive Receptors Near SR-101

5. Many strategies are available to reduce exposure, including, but not limited to, building filtration systems with Minimum Efficiency Reporting Value (MERV) 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Because of the potential adverse health risks involved with siting residential uses near freeways, it is essential that any proposed strategy must be carefully evaluated before implementation.

High Efficiency or Enhanced Filtration Units and Limits

Pursuant to the requirements in LAMC Section 99.04.504.6, installation of an enhanced filtration system rated at a MERV of 13, at a minimum, is required for residential development within 1,000 feet of freeways. When the enhanced filtration system is installed at the Proposed Project, it is important to consider the limitations. For example, in a study that SCAQMD conducted to investigate filters,[15] a cost burden is expected to be within the range of $120 to $240 per year to replace each filter. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the residents. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. Moreover, these filters have no ability to filter out any toxic gases from vehicle exhaust. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail and disclosed to prospective residents prior to assuming that they will sufficiently alleviate exposures to DPM emissions.

Enforceability of High Efficiency or Enhanced Filtration Units

6. Despite the limitations, SCAQMD staff recommends that the Lead Agency make the installation of enhanced filtration units a project design feature that will be required for later project-level development and provide additional details regarding the maintenance and monitoring of filters at the plan-level in the Final EIR. This will ensure that the enhanced filters are enforceable at the project-level development

[13] South Coast Air Quality Management District. Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis. Accessed at: http://www.aqmd.gov/home/regulations/ceqa/airquality-analysis-handbook/mobile-source-toxics-analysis.

[14] SCAQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When SCAQMD acts as the Lead Agency, SCAQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

[15] This study evaluated filters rated MERV 13 or better. Accessed at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyFinalreport.pdf. Also see 2012 Peer Review Journal article by SCAQMD: http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf.

that would be allowed under the Proposed Project as well as effective in reducing exposures to DPM emissions. To facilitate a good-faith effort at full disclosure and provide useful information to future residents at the Proposed Project, at a minimum, the Final EIR should include the following information:

- Disclosure on potential health impacts to prospective residents from living in close proximity to freeways and the reduced effectiveness of air filtration systems when windows are open and/or when residents are outdoors (e.g., in the common usable open space areas);
- Identify the responsible implementing and enforcement agency such as the Lead Agency to ensure that enhanced filtration units are installed on-site at the Proposed Project before a permit of occupancy is issued;
- Identify the responsible implementing and enforcement agency such as the Lead Agency to ensure that enhanced filtration units are inspected and maintained regularly;
- Disclose the potential increase in energy costs for running the HVAC system to prospective residents;
- Provide information to residents on where MERV filters can be purchased;
- Provide recommended schedules (e.g., every year or every six months) for replacing the enhanced filtration units;
- Identify the responsible entity such as future residents themselves, Homeowner's Association, or property management for ensuring enhanced filtration units are replaced on time, if appropriate and feasible (if residents should be responsible for the periodic and regular purchase and replacement of the enhanced filtration units, the Lead Agency should include this information in the disclosure form);
- Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units;
- Set City-wide or project-specific criteria for assessing progress in installing and replacing the enhanced filtration units to demonstrate compliance with and pursuant to LAMC Section 99.04.504.6; and
- Develop a City-wide or project-specific process for evaluating the effectiveness of the enhanced filtration units.

Additional Recommended Mitigation Measures

7. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures in the Final EIR to further reduce emissions and minimize significant air quality impacts, particularly from VOC, NOx, and particulate matter. Additional information on potential mitigation measures as guidance to the Lead Agency is available on the SCAQMD CEQA Air Quality Handbook website[16].

    a) Suspend all soil disturbance activities when winds exceed 25 mph as instantaneous gusts or when visible plumes emanate from the site and stabilize all disturbed areas.

[16] South Coast Air Quality Management District. Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.

b) Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

c) Sweep all streets at least once a day using SCAQMD Rule 1186, 1186.1 certified street sweepers or roadway washing trucks if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water).

d) Apply water three times daily or non-toxic soil stabilizers according to manufacturers' specifications to all unpaved parking or staging areas, unpaved road surfaces, or to areas where soil is disturbed. Reclaimed water should be used. Limit parking supply and unbundle parking costs.

e) Require zero-emissions or near-zero emission on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. At a minimum, require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks (e.g., material delivery trucks and soil import/export) that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards. The Lead Agency should include this requirement in applicable bid documents, purchase orders, and contracts for individual development projects within the Hollywood Community Plan Area. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure and enforce compliance.

f) Require that 240-Volt electrical outlets or Level 2 chargers be installed in parking lots that would enable charging of NEVs and/or battery powered vehicles. Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NOx and ROG impacts from this project. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, SCAQMD staff recommends the Lead Agency require individual development projects within the Hollywood Community Plan Area to provide the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in.

g) Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs throughout the Hollywood community Plan Area to generate solar energy for the facility.

h) Maximize the planting of trees in landscaping and parking lots.

i) Use light colored paving and roofing materials.

j) Require use of electric or alternatively fueled street-sweepers with HEPA filters.

k) Require use of electric lawn mowers and leaf blowers.

l) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

m) Use of water-based or low VOC cleaning products.

n) Since the Proposed Project would be implemented over a period of 20 years or more, the Lead Agency should take this opportunity to deploy strategies that will foster and facilitate the deployment of the lowest emission technologies possible. SCAQMD staff recommends that the Lead Agency develop performance standards-based technology review at a programmatic level that is generally appropriate for an area-wide and long-range plan such as the Proposed Project. The deployment should include those technologies that are "capable of being accomplished in a successful manner within a reasonable period of time" (California Public Resources Code Section 21061.1), such as zero and near-zero emission technologies that are expected to be available in the life of the Proposed Project. As such, SCAQMD staff recommends that the Lead Agency incorporate the performance standards-based technology review or develop other comparable strategies or tools to periodically assess equipment availability, equipment fleet mixtures, and best available emissions control devices. The Lead Agency should also specify performance standards and an appropriate timeline (or schedule) for the technology assessment, such as every two years, that supports the NOx emissions reductions goals and timeline as outlined in the 2016 AQMP. SCAQMD staff encourages the Lead Agency to involve the public and interested agencies such as the SCAQMD and the CARB in developing an appropriate process and performance standards for the technology review.

Compliance with SCAQMD Rule 403(e)

8. The Lead Agency included a discussion on general compliance with SCAQMD Rule 403 in the Draft EIR. Since the Proposed Project is a large operation of approximately 13,962 acres or 21.8 square miles (50-acre sites or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin, the Lead Agency is required to comply with SCAQMD Rule 403(e) – Additional Requirements for Large Operations[17], which includes requirements to provide Large Operation Notification Form 403 N, appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class[18]. Therefore, SCAQMD recommends that the Lead Agency include a discussion to demonstrate specific compliance with SCAQMD Rule 403(e) in the Final EIR. Compliance with SCAQMD Rule 403(e) will further reduce particulate matters from the Proposed Project.

[17] South Coast Air Quality Management District. Rule 403(e). Page 7. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf.

[18] South Coast Air Quality Management District Compliance and Enforcement Staff's contact information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at dustcontrol@aqmd.gov.