



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Supplemental Environmental Impact Report (SEIR) for the Proposed Beverly Hilton Specific Plan Amendment Project (SCH No.:2018051042)

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 SEIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish 166,834 square feet of existing buildings and parking, and construct 150 residential units and subterranean parking on 8.94 acres (Proposed Project). The Proposed Project would also include 5.34 acres of open space. The Proposed Project is expected to be built-out by 2025¹.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's construction and operational air quality impacts would be less than significant after the incorporation of mitigation measures MM-AQ-16 and MM-AQ-17². MM-AQ-17 has two options to reduce NO_x emissions during construction. Option 1 requires that the contractor use construction equipment with a minimum Tier 4 interim rating during the demolition and grading phases of construction. Option 2 requires that demolition and grading phases shall not be conducted concurrently.

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)³, 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. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NO_x) emissions in 2023 and an additional 55 percent NO_x reduction beyond 2031 levels for ozone attainment.

SCAQMD Staff's General Comments

As described in the 2016 AQMP, achieving NO_x 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. While MM-AQ-17 is capable of reducing the Proposed Project's NO_x emissions to 98 pounds per day, the

¹ Draft SEIR. Executive Summary, page 5.

² *Ibid.* Chapter 4.2, page 20.

³ 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>

Proposed Project can still result in a substantial amount of NOx emissions at 98 pounds per day with option 1 and 95 pounds per day with option 2. Therefore, SCAQMD staff recommends changes to MM-AQ-17 to further reduce NOx emissions during operation. Please see the attachment for more information.

Conclusion

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 SEIR. 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)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:AM

LAC181012-02

Control Number

ATTACHMENT

Recommended Change to Mitigation Measure MM-AQ-17:

1. MM-AQ-17 includes two options for the contractor to choose from to reduce NOx emissions during construction. Option 1 requires that the contractor use construction equipment with a minimum Tier 4 interim rating during the demolition and grading phases of construction. Implementation of option 1 would reduce the Proposed Project's NOx emissions to 98 pounds per day. Option 2 requires that demolition and grading phases shall not be conducted concurrently. Each demolition or grading phase must be fully completed before commencement of the subsequent demolition or grading phase. Implementation of option 2 would reduce the Proposed Project's NOx emissions to 95 pounds per day.

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. SCAQMD staff recommends that the Lead Agency incorporate the following changes to MM-AQ-17 in the Final SEIR and implement both options to further reduce construction-related NOx emissions. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website⁴.

MM-AQ-17

The project contractor shall implement ~~at least one of~~ the following two ~~options~~ conditions to reduce NOX emissions during project construction. The project contractor shall submit a plan for achieving reductions of NOX emissions to the City prior to the issuance of construction a demolition permits.

~~Option 1:~~ The project contractor shall only use construction equipment with a minimum Tier 4 interim rating during ~~the demolition and grading~~ all phases of construction, ~~or. Additionally,~~
~~Option 2:~~ ~~D~~ demolition and grading phases shall not be conducted concurrently. Each demolition or grading phase must be fully completed before commencement of the subsequent demolition or grading phase

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