



Alejandro Huerta <alejandro.huerta@lacity.org>

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## Crossroads Hollywood EIR - GSESJA Comments

1 message

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**Joe Bourgeois** <president@gsesja.com>

Sat, Jun 3, 2017 at 6:55 PM

To: "alejandro.huerta@lacity.org" <alejandro.huerta@lacity.org>

Mr. Huerta,

Please find attached comments for the record on behalf of Golden State Environmental and Social Justice Alliance regarding the proposed Crossroads Hollywood EIR.

Thank you,

Joe Bourgeois  
President

Golden State Environmental and Social Justice Alliance

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 **Crossroads Hollywood EIR - GSESJA Comments.pdf**  
3977K



June 3, 2017

VIA EMAIL

Alejandro A. Huerta,  
Environmental Review Coordinator  
City of Los Angeles  
200 North Spring Street, Room 750  
Los Angeles, CA 90012  
[alejandro.huerta@lacity.org](mailto:alejandro.huerta@lacity.org)

**SUBJECT: COMMENTS ON CROSSROADS HOLLYWOOD PROJECT EIR**

To whom it may concern:

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Crossroads Hollywood project. Please accept and consider these comments on behalf of Golden State Environmental and Social Justice Alliance, a California Social Purpose Corporation, Entity #C4017878. Also, Golden State Environmental and Social Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental and Social Justice Alliance 160 W. Foothill Parkway Ste. 105-92 Corona, CA 92882.

As we understand it, the project consists of four separate building sites referred to as Parcels A-D. The project as proposed includes approximately 950 residential units, 308 hotel rooms, approximately 95,000 square feet of office uses, and approximately 185,000 square feet of commercial/retail uses, totaling approximately 1,432,500 square feet of floor area (including existing uses to be retained within the Crossroads of the World complex) upon buildout. It is anticipated that approximately 83,200 square feet and 40,000 square feet of the proposed retail area would consist of restaurant uses and a supermarket, respectively. The Project would

demolish a total of approximately 131,656 gross square feet of existing development, including six properties identified as historic resources. In total, the project would result in an increase of approximately 1,259,927 square feet of net new floor area on the project site.

#### **IV.B - Air Quality**

The EIR includes a proposed construction schedule. The construction schedule presents the project in phases; however, phased construction is not required of the project. The EIR does not present any analysis of impacts or potential mitigation measures from potential overlap of construction phases. There is no statement that the construction phases will not occur concurrently even though it is a fair argument to predict that since the project site is comprised of several disjointed parcels, construction could occur faster on the smaller parcels than the larger parcels. Demolition and grading on Parcel D (the smallest parcel) will by nature occur more quickly than on Parcel C or B (the largest parcels). The EIR does not require Parcel D to halt development during each phase of construction to wait for each of the larger parcels to finish that phase in order for all four of the parcels to stay on the same phase of construction simultaneously throughout the development of the project. The Air Quality Analysis (Appendix C) indicates that the building construction phase and architectural coating phase will overlap, but there is no discussion of this in the EIR. Faster construction would potentially result in significantly greater daily impacts.

Section 41.40 of the LAMC prohibits construction activity (including demolition) and repair work between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. All such activities are also prohibited on Sundays and all federal holidays. Thus, the legal hours of construction in the City of Los Angeles are 7:00 A.M. - 9:00 P.M., Monday - Friday and 8:00 A.M. - 6:00 P.M. on Saturday. The EIR does not provide a "worst-case scenario" analysis of construction equipment emitting pollutants for the legal 14 hours per weekday plus 8 hours on Saturday. It is legal for construction to occur for much longer hours and an additional day (6 days per week including Saturday) than modeled in the Air Quality Analysis. The Air Quality modeling must be revised to account for these legally possible longer construction days and increased number of construction days.

Appendix C and the EIR do not present any analysis or reasoning for the estimated number of workers during construction, their number of trips, or their trip length. Appendix C also assumes 0 worker trips during the architectural coating phase and this is not discussed in the EIR. The EIR is inadequate as an informational document and must be revised to include the methodology for estimating the number of workers during construction, their number of trips, and their trip length.

Potential localized impacts were evaluated in relation to Larchmont Charter School which the EIR finds to be “immediately east of Development Parcel D” and the closest sensitive receptor. The EIR chooses to utilize Larchmont Charter School as the closest sensitive receptor even though it is separated from Parcel D by Cherokee Avenue. Further, the EIR does not identify 1605 N. Cherokee Ave. (Selma Community Housing - multifamily residential) as a sensitive receptor which is adjacent to Parcel D. Based on review of *Figure IV.B-3 Air Quality Sensitive Receptors Locations* (which does not specifically identify Larchmont Charter School), Larchmont Charter School is the sensitive receptor located farthest from any of the Development Parcels. Multifamily residential is identified as adjacent to Parcel A, First Baptist Church of Hollywood is adjacent to Parcel C and Parcel B, and Blessed Sacrament Church and School is adjacent to Parcel B. The EIR and Appendix C must be revised to accurately identify the locations of all sensitive receptors in order to comply with CEQA’s requirements for meaningful disclosure and be useful as an informational document. The Air Quality modeling must be revised to analyze air quality impacts on the nearest sensitive receptors based on exposure at their property lines in order to present a “worst-case scenario” conservative and accurate estimate.

The EIR lists applicable goals, objectives, and policies from the Air Quality Element of the Los Angeles General Plan. The EIR does not include:

GOAL 1: Good air quality and mobility in an environment of continued population growth and healthy economic structure.

Objective 1.1: It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.

The EIR concludes that even though mitigated operational emissions will exceed the SCAQMD daily emission threshold for VOC and NO<sub>x</sub> and the daily regional operational threshold for CO, the project would have a less than significant impact “with regard to the consistency with the air quality policies set forth in the SCAQMD’s AQMP and the City of Los Angeles General Plan Air Quality Element”. Exceeding the AQMP thresholds is not consistent with the City of Los Angeles General Plan Air Quality Element Policy 1.1.1. The EIR is inadequate as an informational document by presenting an erroneous conclusion. The EIR must be revised to accurately describe the proposed project’s inconsistency with the applicable policy and its significant and unavoidable impact to air quality.

#### **IV.D - Cultural Resources**

The project would result in the removal of six properties identified as historic resources which the EIR states no mitigation measures are feasible to reduce this significant and unavoidable impact. Cumulative impacts to historic resources are also concluded to be significant and unavoidable. The EIR does not identify any mitigation measures. Possible mitigation measures that the EIR fails to explore include, but are not limited to:

1. Relocate the historic buildings on-site, off-site, or offer the buildings for sale instead of destruction/demolition.
2. Partial retention of the existing historic buildings by adding on to the building according to the Secretary of the Interior's Standards.
3. Salvage a portion of the building and design the project around the historic portion.
4. Salvage and reuse historic architectural features (doors, windows, accents, etc).
5. Salvage and reuse portions/materials for new development on site (brick paving, public art, etc).
6. Donate or sell unused architectural features to a museum, public building, library, etc for display.
7. Include an on-site interpretive center dedicated to the historic resources at the project site that includes books, pamphlets, and/or walking tours.
8. Commemorate the historic resources through signage, plaques, etc at the project site.
9. Establish a mitigation or memorial fund dedicated to preserving historic resources within the vicinity of the project site.

#### **IV.I - Noise**

*Figure IV.I-1 Noise Measurement Locations* identifies the multifamily residential (1605 N. Cherokee Avenue - Selma Community Housing) adjacent to Parcel D but it is not a noise measurement location and the EIR does not disclose why this site was not analyzed for noise measurement. The EIR and Noise Analysis must be revised to adequately analyze the potentially significant noise impacts on the sensitive receptors located at 1605 N. Cherokee Avenue.

The EIR presents estimated numbers of daily construction truck and worker trips that are much lower than the estimations provided in the Air Quality Analysis (Table IV.I-12). Additionally, construction truck traffic is estimated to occur over an 8-hour workday while construction is legally able to occur 14 hours per weekday plus 8 hours on Saturday (LAMC 41.40).

Mitigation Measure I-1 must be revised to include an impermeable sound barrier along the eastern property line of Parcel D in order to mitigate potentially significant impacts to the adjacent multifamily residential (1605 N. Cherokee Avenue - Selma Community Housing). Mitigation Measure I-3 must also be revised to require a 12 foot high noise barrier wall to be erected along the eastern property line adjacent to 1605 N. Cherokee Avenue - Selma Community Housing.

There is no analysis presented regarding the overlap of construction phases and the potential noise impacts that may occur as a result. Appendix C (Air Quality Analysis) indicates that at minimum the building construction and paving phases will overlap. The EIR must address the potential noise impacts from overlap of construction phases.

#### **IV.L- Traffic, Access, and Parking**

Appendix O (Traffic Analysis) only analyzes traffic impacts during the grading and construction phases of the project even though the demolition, foundation, and paving phases combined add an estimated 240 construction days according to the Air Quality Analysis (Appendix C). The EIR reasons that peak worker days will occur during the grading and construction phases; however, the demolition, foundation, and paving phases have potential to increase cumulative impacts during construction. The EIR must be revised to address these potential impacts in order to comply with CEQA's requirements for meaningful disclosure.

Further, the Traffic Analysis does not utilize the same worker trip estimates that the Air Quality Analysis utilizes. For example, the Traffic Analysis assumes that there will be 450 workdays during the Construction phase with an average of 144 workers. The Air Quality Analysis presents the Construction phase scheduled to last 900 days with an average of 1,442 workers. The EIR presents conflicting information to make different conclusions. The EIR must be revised to address these inconsistencies in order to be an adequate informational document.

#### **V - Alternatives**

The EIR is deficient in identifying alternatives that reduce significant impacts to the environment. Additional alternatives for analysis could include, but are not limited to:

1. A reduced intensity alternative that reduces the net development of the project enough to avoid significant and unavoidable impacts to air quality.
2. A reduced intensity alternative that reduces the net development of the project enough to avoid significant and unavoidable impacts to noise.
3. A reduced intensity alternative that reduces the net development of the project enough to avoid significant and unavoidable impacts to traffic.
4. A project design that includes live/work units to relieve significant impacts to traffic and implement applicable policies related to telecommuting and alternative work schedules.
5. A project design that conforms to the maximum 4.5 FAR to avoid a Zone Change.
6. A project design that includes increased passive/active open space at the pedestrian level to increase recreation in the mix of on-site uses and decrease traffic-generating uses.
7. A project design that includes reduced parking requirements for non-residential uses to discourage passenger vehicle trips.
8. Require the availability of employer-based transit passes to reduce significant traffic impacts.
9. Require employers at the project site to participate in regional carpooling programs to reduce significant traffic impacts.

### **Conclusion**

For the foregoing reasons, Golden State Environmental and Social Justice Alliance believes the EIR is flawed and an amended EIR must be prepared for the proposed project and circulated for public review. Golden State Environmental and Social Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental and Social Justice Alliance 160 W. Foothill Parkway Ste. 105-92 Corona, CA 92882.

Sincerely,



Joe Bourgeois  
President  
Golden State Environmental and Social Justice Alliance