



Alejandro Huerta <alejandro.huerta@lacity.org>

Fwd: AB900 Consultation for Crossroads Hollywood Project

28 messages

Luciralia Ibarra <luciralia.ibarra@lacity.org>

Wed, Oct 5, 2016 at 11:34 AM

To: Alejandro Huerta <alejandro.huerta@lacity.org>, Sarah Molina-Pearson <sarah.molina-pearson@lacity.org>

fyi...

----- Forwarded message -----

From: **King, Heather@ARB** <Heather.King@arb.ca.gov>

Date: Wed, Oct 5, 2016 at 11:16 AM

Subject: RE: AB900 Consultation for Crossroads Hollywood Project

To: Luciralia Ibarra <luciralia.ibarra@lacity.org>

Hi, Luci.

Thanks so much for your time today. I'm attaching a document that includes the applicant's proposed commitment language to purchase GHG offsets on pages 4-6 of the pdf (Commitment Letter). You can ignore the rest of the pdf.

We would like the applicant to modify #2 in the following way.

2. "No later than six (6) months after Project Stabilization, to be defined as the date following Project completion when the Project is 90 percent leased and occupied, **or within one year from the issuance of a Temporary Certificate of Occupancy, whichever occurs first**, the Project Sponsor shall...

Looking forward to hearing the City's feedback, if any, on how to make the commitment more enforceable. After we receive your input, we'll ask the applicant to revise the letter accordingly and re-submit this to OPR as an amendment to their AB 900 application. Let me know if you have any follow-up questions in the meantime.

Thanks again,

-Heather

Heather King, AICP

Air Pollution Specialist, Sustainable Communities Policy and Planning Section

Air Quality Planning and Science Division

California Air Resources Board

heather.king@arb.ca.gov

Ph. 916-322-0339

From: Luciralia Ibarra [mailto:luciralia.ibarra@lacity.org]

Sent: Tuesday, October 04, 2016 4:18 PM

To: King, Heather@ARB

Subject: Re: AB900 Consultation for Crossroads Hollywood Project

That works for me. Should I call you at the number in your email signature?

-Luci

On Tue, Oct 4, 2016 at 3:53 PM, King, Heather@ARB <Heather.King@arb.ca.gov> wrote:

Hi, Luci.

Thanks so much for getting back to me so quickly. Tomorrow morning would be great. I'm available any time. I'll suggest 10am, but let me know if you prefer a different time.

The call shouldn't take too long. Is [213.978.1378](tel:213.978.1378) the best number to reach you?

Thanks again!

-Heather

From: Luciralia Ibarra [mailto:luciralia.ibarra@lacity.org]

Sent: Tuesday, October 04, 2016 10:55 AM

To: King, Heather@ARB

Subject: Re: AB900 Consultation for Crossroads Hollywood Project

Hi Heather,

Thank you for reaching out. We are familiar with the process as we currently have a project (8150 Sunset) utilizing AB900. We have uploaded the application materials, EIR comments, and uploaded regular updates of the Administrative Record to our planning website. I have time tomorrow morning to discuss if that works for you.

Thank you,

Luci

On Tue, Oct 4, 2016 at 10:21 AM, King, Heather@ARB <Heather.King@arb.ca.gov> wrote:

Good morning, Luciralia.

I am with the California Air Resources Board (ARB), and have been coordinating with the Project Sponsor for the Crossroads Hollywood Project on their application for CEQA streamlining under AB 900. The applicant's representatives provided your contact info at my request.

Are you familiar with the AB 900 certification by the Governor (https://www.opr.ca.gov/s_californiajobs.php)? ARB makes a determination regarding the project's analysis of greenhouse gas emissions as part of that process.

It's customary for ARB to consult with the Lead Agency on all AB 900 projects. I am hoping to arrange a time to chat with you about the project and about ARB's determination, as it relates to the certification for CEQA streamlining. Would you have 30 minutes to chat sometime today or tomorrow?

Thank you, and I look forward to talking with you.

-Heather

Heather King, AICP

Air Pollution Specialist, Sustainable Communities Policy and Planning Section

Air Quality Planning and Science Division

California Air Resources Board

heather.king@arb.ca.gov

Ph. [916-322-0339](tel:916-322-0339)

--

[Redacted Signature]

Luciralia Ibarra | Senior City Planner

Major Projects | Department of City Planning | City of Los Angeles

luciralia.ibarra@lacity.org | [213.978.1378](tel:213.978.1378) | [213.978.1343](tel:213.978.1343) (f)

--

Luciralia Ibarra | Senior City Planner

Major Projects | Department of City Planning | City of Los Angeles

luciralia.ibarra@lacity.org | 213.978.1378 | 213.978.1343 (f)



Luciralia Ibarra | Senior City Planner

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GHG Methodology and Documentation Report Appendices.pdf

5790K

Luciralia Ibarra <luciralia.ibarra@lacity.org>

Wed, Oct 5, 2016 at 11:36 AM

To: "King, Heather@ARB" <Heather.King@arb.ca.gov>

Cc: Alejandro Huerta <alejandro.huerta@lacity.org>, Sarah Molina-Pearson <sarah.molina-pearson@lacity.org>

Thanks, Heather.

I have cc'd Alejandro and Sarah to keep them in the loop. We'll reach out once we've had a chance to meet with our City Attorneys.

Thank you,

Luci

[Quoted text hidden]

Alejandro Huerta <alejandro.huerta@lacity.org>

Wed, Oct 12, 2016 at 10:44 AM

To: "King, Heather@ARB" <Heather.King@arb.ca.gov>

Hi Heather. Sarah and I met with the City Attorney yesterday, so we are working on proposed language.

ALEJANDRO A. HUERTA

Los Angeles City Planning

Major Projects

213•978•1454



[Quoted text hidden]

King, Heather@ARB <Heather.King@arb.ca.gov>

Wed, Oct 12, 2016 at 10:45 AM

To: Alejandro Huerta <alejandro.huerta@lacity.org>

Thanks very much for the update!

-Heather

From: Alejandro Huerta [mailto:alejandro.huerta@lacity.org]
Sent: Wednesday, October 12, 2016 10:44 AM
To: King, Heather@ARB
Subject: Re: AB900 Consultation for Crossroads Hollywood Project

Hi Heather. Sarah and I met with the City Attorney yesterday, so we are working on proposed language.

ALEJANDRO A. HUERTA

Los Angeles City Planning

[Major Projects](#)

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[Redacted signature]

[Quoted text hidden]

Alejandro Huerta <alejandro.huerta@lacity.org>
To: "King, Heather@ARB" <Heather.King@arb.ca.gov>

Wed, Oct 12, 2016 at 5:48 PM

Sure. Here is the draft language below. Let me know your thoughts.

Prior to issuance of any Certificate of Occupancy for the Project, the Applicant or its successor shall enter into one or more contracts to purchase carbon credits from a qualified GHG emissions broker, in an amount sufficient to offset the Operations Emission attributable to the Project (to be calculated on a net present value basis for a 30-year useful life, the estimated life of the Project, or other time period consistent with CARB-adopted standards for a project of this scale) to achieve zero-net emissions attributable to the Project.

Prior to execution of the contract(s), the Applicant and its consultant shall calculate the Operations Emission, based on reasonable projections using an industry-accepted or CARB-proscribed methodology, at the time Applicant purchases the carbon credits. Applicant shall afford the City an opportunity to review and approve its selection of an air quality consultant prior to calculation of the Operations Emission.

Once the City has had an opportunity to review and approve the methodology and associated calculations, Applicant shall provide courtesy copies of the calculation methodology to the CARB and the Governor's Office of Planning and Research.

ALEJANDRO A. HUERTA
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[Quoted text hidden]

King, Heather@ARB <Heather.King@arb.ca.gov>
To: Alejandro Huerta <alejandro.huerta@lacity.org>

Thu, Oct 13, 2016 at 9:29 AM

Good morning, Alejandro.

Thank you for sharing the revised language. It looks good, and we also prefer this approach to require all remaining GHG emissions be offset upfront.

Will this language appear in the Project's Conditions of Approval?

Will the City require the applicant to provide you with copies of executed contracts to purchase the carbon credits prior to issuing the Certificate of Occupancy? Is that how you will verify that this condition has been met?

It is our understanding that the applicant will follow the methodology proposed in their AB 900 application to estimate the GHG emissions, and we think this methodology is reasonable. We don't foresee a need for the applicant to change their methodology down the line.

Thanks again!

-Heather

Heather King, AICP

Air Pollution Specialist, Sustainable Communities Policy and Planning Section

Air Quality Planning and Science Division

California Air Resources Board

heather.king@arb.ca.gov

Ph. 916-322-0339

From: Alejandro Huerta [mailto:alejandro.huerta@lacity.org]
Sent: Wednesday, October 12, 2016 5:49 PM
To: King, Heather@ARB
Subject: Re: AB900 Consultation for Crossroads Hollywood Project

Sure. Here is the draft language below. Let me know your thoughts.

Prior to issuance of any Certificate of Occupancy for the Project, the Applicant or its successor shall enter into one or more contracts to purchase carbon credits from a qualified GHG emissions broker, in an amount sufficient to offset the Operations Emission attributable to the Project (to be calculated on a net present value basis for a 30-year useful life, the estimated life of the Project, or other time period consistent with CARB-adopted standards for a project of this scale) to achieve zero-net emissions attributable to the Project.

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Once the City has had an opportunity to review and approve the methodology and associated calculations, Applicant shall provide courtesy copies of the calculation methodology to the CARB and the Governor's Office of Planning and Research.

ALEJANDRO A. HUERTA

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[Quoted text hidden]

Alejandro Huerta <alejandro.huerta@lacity.org>
To: Kimberly Huangfu <kimberly.huangfu@lacity.org>

Thu, Oct 13, 2016 at 10:26 AM

Hi Kimberly. See feedback below from CARB for the Crossroads GHG carbon offset language. Could you help me answer her questions?

Seems like we can make this a condition of approval since the applicant is proposing this as Project Design Feature (which would then be included in the Mitigation Monitoring Program).

She has a point about how that condition would be cleared - is acceptance of the copies of the executed contracts okay? If so, could you please edit the language appropriately.

Cheers,
ALEJANDRO A. HUERTA
213•978•1454

----- Forwarded message -----

From: **King, Heather@ARB** <Heather.King@arb.ca.gov>

[Quoted text hidden]

Kimberly Huangfu <kimberly.huangfu@lacity.org>
To: Alejandro Huerta <alejandro.huerta@lacity.org>

Thu, Oct 13, 2016 at 11:01 AM

Got it. I will revise accordingly and will run it past Kathy and John. Thanks!

Kimberly A. Huangfu | Deputy City Attorney
Land Use Division | City of Los Angeles City Attorney's Office
200 North Main Street | Room 701 | City Hall East
Los Angeles, California 90012
kimberly.huangfu@lacity.org | 213.978.7121 (Direct) | 213.978.8214 (Fax)



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Alejandro Huerta <alejandro.huerta@lacity.org>
To: "King, Heather@ARB" <Heather.King@arb.ca.gov>

Thu, Oct 13, 2016 at 11:09 AM

Hi. I appreciate the feedback. I've asked the City Attorney to look at your suggestion re: the copies of the executed contracts.

Regarding your first question, yes - once we finalize the language on this, the environmental consultant can edit the GHG section to include it as Project Design Feature, which would then become a condition of approval for the project.

I hope that helps answer your questions,

ALEJANDRO A. HUERTA
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[Quoted text hidden]

Kimberly Huangfu <kimberly.huangfu@lacity.org>
To: Alejandro Huerta <alejandro.huerta@lacity.org>

Thu, Oct 13, 2016 at 2:44 PM

Hi Alejandro,

I spoke to Heather today, who was extremely helpful in clarifying CARB and OPR's role in the AB900 streamlining process. Here are clean and redline copies of the revised language:

Prior to issuance of any Certificate of Occupancy for the Project, the Applicant or its successor shall enter into one or more contracts to purchase carbon credits from a qualified GHG emissions broker (to be selected from an accredited registry). The purchase of carbon credits shall be in an amount sufficient to offset the Operations Emission attributable to the Project and shall be calculated on a net present value basis for a 30-year useful life.

Prior to execution of the contract(s), the Applicant and its consultant shall calculate the Operations Emission, in accordance with the methodology described in Part 7 of the Applicant's "Application for Environmental Leadership Development Project", specifically Eyestone Environmental's August 2016 "Greenhouse Gas Emissions Methodology and Documentation".

Once the City has had an opportunity to review and approve the methodology and associated calculations, Applicant shall provide copies of the calculation methodology to the California Air Resources Board (CARB) and Governor's Office of Planning and Research (OPR), which is then subject to a determination signed by the Executive Officer of CARB pursuant to the procedures set forth in Section 6 of OPR's Guidelines. The City will issue a Certificate of Occupancy upon receipt of the following: (1) a fully executed copy of the carbon offset purchase agreement(s), (2) a final CARB Determination that the Project will not result in any net additional GHG emissions, and (3) a copy of OPR's Certification Letter for the Project.

Redline:

Prior to issuance of any Certificate of Occupancy for the Project, the Applicant or its successor shall enter into one or more contracts to purchase carbon credits from a qualified GHG emissions broker (to be selected from an accredited registry). The purchase of carbon credits shall be, in an amount sufficient to offset the Operations Emission attributable to the Project and shall ~~(to be calculated on a net present value basis for a 30-year useful life, the estimated life of the Project, or other time period consistent with CARB-adopted standards for a project of this scale) to achieve zero-net emissions attributable to the Project.~~

Prior to execution of the contract(s), the Applicant and its consultant shall calculate the Operations Emission, in accordance with based on the methodology described in Part 7 of the Applicant's "Application for Environmental Leadership Development Project", specifically Eyestone Environmental's August 2016 "Greenhouse Gas Emissions Methodology and Documentation", reasonable projections using an industry-accepted or CARB-proscribed methodology, at the time Applicant purchases the carbon credits. Applicant shall afford the City an opportunity to review and approve its selection of an air quality consultant prior to calculation of the Operations Emission.

Once the City has had an opportunity to review and approve the methodology and associated calculations, Applicant shall provide ~~courtesy~~ copies of the calculation methodology to the California Air Resources Board (CARB) CARB and the Governor's Office of Planning and Research (OPR), which is then subject to a determination signed by the Executive Officer of CARB in accordance with the procedures set forth in Section 6 of OPR's Guidelines. The City will issue a Certificate of Occupancy upon receipt of the following: (1) a fully executed copy of the carbon offset purchase agreement(s), (2) a final CARB Determination that the Project will not result in any net additional GHG emissions, and (3) a copy of OPR's Certification Letter for the Project.



Please let me know if you have any questions or if you think any other provisions of the condition need to be tweaked. Thanks!

Kimberly A. Huangfu | Deputy City Attorney
Land Use Division | City of Los Angeles City Attorney's Office
200 North Main Street | Room 701 | City Hall East
Los Angeles, California 90012
kimberly.huangfu@lacity.org | 213.978.7121 (Direct) | 213.978.8214 (Fax)



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Kimberly Huangfu <kimberly.huangfu@lacity.org>

Thu, Oct 13, 2016 at 2:46 PM

To: Alejandro Huerta <alejandro.huerta@lacity.org>

Cc: Sarah Molina-Pearson <sarah.molina-pearson@lacity.org>, Luciralia Ibarra <luciralia.ibarra@lacity.org>, KATHY AINSWORTH <kathy.ainsworth@lacity.org>, John Fox <john.fox@lacity.org>

My apologies - resending with a cc: to Sarah, Luci, Kathy, and John.

Kimberly A. Huangfu | Deputy City Attorney
Land Use Division | City of Los Angeles City Attorney's Office
200 North Main Street | Room 701 | City Hall East
Los Angeles, California 90012
kimberly.huangfu@lacity.org | 213.978.7121 (Direct) | 213.978.8214 (Fax)



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----- Forwarded message -----

From: **Kimberly Huangfu** <kimberly.huangfu@lacity.org>

Date: Thu, Oct 13, 2016 at 2:44 PM

Subject: Re: AB900 Consultation for Crossroads Hollywood Project

[Quoted text hidden]

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Alejandro Huerta <alejandro.huerta@lacity.org>
To: Kimberly Huangfu <kimberly.huangfu@lacity.org>

Thu, Oct 13, 2016 at 2:53 PM

Looks good! Awesome!

ALEJANDRO A. HUERTA
Los Angeles City Planning
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[Quoted text hidden]

Alejandro Huerta <alejandro.huerta@lacity.org>
To: "King, Heather@ARB" <Heather.King@arb.ca.gov>

Thu, Oct 13, 2016 at 2:56 PM

Hi. Based on your conversation with Kimberly, below is the final draft condition. If you're okay with it, finalize it and let Eyestone Environmental know.

Prior to issuance of any Certificate of Occupancy for the Project, the Applicant or its successor shall enter into one or more contracts to purchase carbon credits from a qualified GHG emissions broker (to be selected from an accredited registry). The purchase of carbon credits shall be in an amount sufficient to offset the Operations Emission attributable to the Project and shall be calculated on a net present value basis for a 30-year useful life.

Prior to execution of the contract(s), the Applicant and its consultant shall calculate the Operations Emission, in accordance with the methodology described in Part 7 of the Applicant's "Application for Environmental Leadership Development Project", specifically Eyestone Environmental's August 2016 "Greenhouse Gas Emissions Methodology and Documentation".

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ALEJANDRO A. HUERTA
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[Quoted text hidden]

Kimberly Huangfu <kimberly.huangfu@lacity.org>
To: Alejandro Huerta <alejandro.huerta@lacity.org>

Thu, Oct 13, 2016 at 3:01 PM

Great! We'll see how the applicant feels about it. I pulled the verbiage from the AB900 guidelines, so hopefully we won't be met with any opposition.

Kimberly A. Huangfu | Deputy City Attorney

Land Use Division | City of Los Angeles City Attorney's Office

200 North Main Street | Room 701 | City Hall East

Los Angeles, California 90012

kimberly.huangfu@lacity.org | 213.978.7121 (Direct) | 213.978.8214 (Fax)



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[Quoted text hidden]

[Quoted text hidden]

King, Heather@ARB <Heather.King@arb.ca.gov>
To: Alejandro Huerta <alejandro.huerta@lacity.org>

Thu, Oct 13, 2016 at 3:22 PM

Thank you very much. We will do that.

Best,

-Heather

From: Alejandro Huerta [mailto:alejandro.huerta@lacity.org]
Sent: Thursday, October 13, 2016 2:56 PM
To: King, Heather@ARB
Subject: Re: AB900 Consultation for Crossroads Hollywood Project

Hi. Based on your conversation with Kimberly, below is the final draft condition. If you're okay with it, finalize it and let Eyestone Environmental know.

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Prior to execution of the contract(s), the Applicant and its consultant shall calculate the Operations Emission, in accordance with the methodology described in Part 7 of the Applicant's "Application for Environmental Leadership Development

Project”, specifically Eyestone Environmental's August 2016 “Greenhouse Gas Emissions Methodology and Documentation”.

Once the City has had an opportunity to review and approve the methodology and associated calculations, Applicant shall provide copies of the calculation methodology to the California Air Resources Board (CARB) and Governor’s Office of Planning and Research (OPR), which is then subject to a determination signed by the Executive Officer of CARB pursuant to the procedures set forth in Section 6 of OPR’s Guidelines. The City will issue a Certificate of Occupancy upon receipt of the following: (1) a fully executed copy of the carbon offset purchase agreement(s), (2) a final CARB Determination that the Project will not result in any net additional GHG emissions, and (3) a copy of OPR’s Certification Letter for the Project.

ALEJANDRO A. HUERTA

Los Angeles City Planning

Major Projects

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Alejandro Huerta <alejandro.huerta@lacity.org>
To: "King, Heather@ARB" <Heather.King@arb.ca.gov>

Thu, Oct 13, 2016 at 3:47 PM

Great.

ALEJANDRO A. HUERTA
Los Angeles City Planning
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[Quoted text hidden]

King, Heather@ARB <Heather.King@arb.ca.gov>
To: Alejandro Huerta <alejandro.huerta@lacity.org>

Tue, Oct 18, 2016 at 5:02 PM

Hi, Alejandro.

I spoke with the Crossroads applicant and Eyestone representatives today, and they will be contacting you to discuss some edits to this language. They are interested in doing incremental purchases of GHG credits tied to each C of O, rather than all at once prior to first C of O. We at ARB are conceptually ok with this, but want to make sure that all parties agree to the final language.

I just wanted to give you a heads up that you may be hearing from them soon.

Thanks again,

-Heather

Heather King, AICP

Air Pollution Specialist, Sustainable Communities Policy and Planning Section

Air Quality Planning and Science Division

California Air Resources Board

heather.king@arb.ca.gov

Ph. 916-322-0339

From: Alejandro Huerta [mailto:alejandro.huerta@lacity.org]

Sent: Thursday, October 13, 2016 2:56 PM

To: King, Heather@ARB

Subject: Re: AB900 Consultation for Crossroads Hollywood Project

Hi. Based on your conversation with Kimberly, below is the final draft condition. If you're okay with it, finalize it and let Eyestone Environmental know.

Prior to issuance of any Certificate of Occupancy for the Project, the Applicant or its successor shall enter into one or more contracts to purchase carbon credits from a qualified GHG emissions broker (to be selected from an accredited registry). The purchase of carbon credits shall be in an amount sufficient to offset the Operations Emission attributable to the Project and shall be calculated on a net present value basis for a 30-year useful life.

Prior to execution of the contract(s), the Applicant and its consultant shall calculate the Operations Emission, in accordance with the methodology described in Part 7 of the Applicant's "Application for Environmental Leadership Development Project", specifically Eyestone Environmental's August 2016 "Greenhouse Gas Emissions Methodology and Documentation".

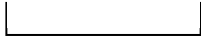
Once the City has had an opportunity to review and approve the methodology and associated calculations, Applicant shall provide copies of the calculation methodology to the California Air Resources Board (CARB) and Governor's Office of Planning and Research (OPR), which is then subject to a determination signed by the Executive Officer of CARB pursuant to the procedures set forth in Section 6 of OPR's Guidelines. The City will issue a Certificate of Occupancy upon receipt of the following: (1) a fully executed copy of the carbon offset purchase agreement(s), (2) a final CARB Determination that the Project will not result in any net additional GHG emissions, and (3) a copy of OPR's Certification Letter for the Project.

ALEJANDRO A. HUERTA

Los Angeles City Planning

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[Quoted text hidden]

Alejandro Huerta <alejandro.huerta@lacity.org>
To: "King, Heather@ARB" <Heather.King@arb.ca.gov>
Cc: Sarah Molina-Pearson <sarah.molina-pearson@lacity.org>

Tue, Oct 18, 2016 at 5:05 PM

Hi Heather,

Okay, thanks for keeping us in the loop about the GHG carbon offset condition for the proposed Crossroads of the World project. We'll wait to hear from the applicant.

Sincerely,

ALEJANDRO A. HUERTA
Los Angeles City Planning
[Major Projects](#)
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[Quoted text hidden]

Alejandro Huerta <alejandro.huerta@lacity.org>
To: Kimberly Huangfu <kimberly.huangfu@lacity.org>

Tue, Oct 18, 2016 at 5:08 PM

Hi Kimberly,

Just to keep you in the loop re: Crossroads of the World carbon offset condition that you helped us with, it looks like the applicant wishes to do incremental purchases of the GHG credits. They'll reach out to me with proposed changes and I'll continue to keep you in the loop and ask for your help. See Heather's email below re: ARB's position about this proposed change.

Sincerely,
ALEJANDRO A. HUERTA
Los Angeles City Planning
[Major Projects](#)
213•978•1454



----- Forwarded message -----

From: **King, Heather@ARB** <Heather.King@arb.ca.gov>

[Quoted text hidden]

Kimberly Huangfu <kimberly.huangfu@lacity.org>
To: Alejandro Huerta <alejandro.huerta@lacity.org>
Cc: Kathryn Phelan <kathryn.phelan@lacity.org>, John Fox <john.fox@lacity.org>

Tue, Oct 18, 2016 at 6:18 PM

Hi Alejandro,

Thanks so much for the update. Yes, please feel free to email for assistance as we navigate through this process. As we discussed previously, we may want to require that the applicant execute a recorded covenant as an additional safeguard given this change. I assume that the incremental purchase of offsets would correspond with the GHGs attributable to that particular project phase.

Thanks!

[Quoted text hidden]

--

Kimberly A. Huangfu | Deputy City Attorney
Land Use Division | City of Los Angeles City Attorney's Office
200 North Main Street | Room 701 | City Hall East
Los Angeles, California 90012
kimberly.huangfu@lacity.org | 213.978.7121 (Direct) | 213.978.8214 (Fax)

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Alejandro Huerta <alejandro.huerta@lacity.org>
To: Kimberly Huangfu <kimberly.huangfu@lacity.org>
Cc: Kathryn Phelan <kathryn.phelan@lacity.org>, John Fox <john.fox@lacity.org>, Luciralia Ibarra <luciralia.ibarra@lacity.org>, Sarah Molina-Pearson <sarah.molina-pearson@lacity.org>

Fri, Oct 21, 2016 at 2:42 PM

Dear Kimberly:

Attached is the applicant's revised language for the Crossroads Hollywood carbon offset condition. Please review.

Sincerely,

ALEJANDRO A. HUERTA

Los Angeles City Planning

Major Projects

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Commitment letter revisions.docx

27K

Kimberly Huangfu <kimberly.huangfu@lacity.org>

Sat, Oct 22, 2016 at 11:42 AM

To: Alejandro Huerta <alejandro.huerta@lacity.org>

Cc: Kathryn Phelan <kathryn.phelan@lacity.org>, John Fox <john.fox@lacity.org>, Luciralia Ibarra <luciralia.ibarra@lacity.org>, Sarah Molina-Pearson <sarah.molina-pearson@lacity.org>

Hi Alejandro,

We have reviewed the applicant's proposed language and the edits are fine. Let us know if you have any other questions or concerns. Thanks!

[Quoted text hidden]

[Quoted text hidden]

Alejandro Huerta <alejandro.huerta@lacity.org>

Mon, Oct 24, 2016 at 7:38 AM

To: "King, Heather@ARB" <Heather.King@arb.ca.gov>

Hello Heather,

Here are the latest changes to the Crossroads condition that our City Attorney has reviewed. Before we finalize, I wanted to show you the changes (underlined) and see if you had any final thoughts.

"Prior to issuance of any Certificate of Occupancy for any building in the Project, the Applicant or its successor shall enter into one or more contracts to purchase carbon credits from a qualified GHG emissions broker (to be selected from an accredited registry), which contract, together with any previous contracts for the purchase of carbon credits, shall evidence the purchase of carbon credits in an amount sufficient to offset the Operational Emissions attributable to such building in the Project as well as all previously constructed buildings in the Project and shall be calculated on a net present value basis for a 30-year useful life.

"Prior to execution of the contract(s), the Applicant and its consultant shall calculate the Operational Emissions, in accordance with the methodology described in the Applicant's "Application for Environmental Leadership Development Project", specifically the "Greenhouse Gas Emissions Methodology and Documentation" prepared by Eyestone Environmental.

"Once the City has had an opportunity to review and approve the methodology and associated calculations, the Applicant shall provide copies of the calculation methodology to the California Air Resources Board (CARB) and Governor's Office of Planning and Research (OPR), which is then subject to a determination signed by the Executive Officer of CARB pursuant to the procedures set forth in Section 6 of OPR's Guidelines. The City will issue a Certificate of Occupancy upon receipt of the following: (1) a fully executed copy of the carbon offset purchase agreement(s), (2) a final CARB Determination that the Project will not result in any net additional GHG emissions, and (3) a copy of OPR's Certification Letter for the Project."

ALEJANDRO A. HUERTA

Los Angeles City Planning

Major Projects

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[Quoted text hidden]

Alejandro Huerta <alejandro.huerta@lacity.org>

Mon, Oct 24, 2016 at 7:41 AM

To: Kimberly Huangfu <kimberly.huangfu@lacity.org>

Cc: Kathryn Phelan <kathryn.phelan@lacity.org>, John Fox <john.fox@lacity.org>, Luciralia Ibarra <luciralia.ibarra@lacity.org>, Sarah Molina-Pearson <sarah.molina-pearson@lacity.org>

Hi Kimberly,

I appreciate the quick review of the Crossroads carbon offset condition. I've forwarded the language to Heather at CARB to see if she has any final thoughts.

Sincerely,

ALEJANDRO A. HUERTA

Los Angeles City Planning

Major Projects

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On Sat, Oct 22, 2016 at 11:42 AM, Kimberly Huangfu <kimberly.huangfu@lacity.org> wrote:

Hi Alejandro,

We have reviewed the applicant's proposed language and the edits are fine. Let us know if you have any other questions or concerns. Thanks!

On Friday, October 21, 2016, Alejandro Huerta <alejandro.huerta@lacity.org> wrote:

Dear Kimberly:

Attached is the applicant's revised language for the Crossroads Hollywood carbon offset condition. Please review.

Sincerely,

ALEJANDRO A. HUERTA

Los Angeles City Planning

Major Projects

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On Tue, Oct 18, 2016 at 6:18 PM, Kimberly Huangfu <kimberly.huangfu@lacity.org> wrote:

Hi Alejandro,

Thanks so much for the update. Yes, please feel free to email for assistance as we navigate through this process. As we discussed previously, we may want to require that the applicant execute a recorded covenant as an additional safeguard given this change. I assume that the incremental purchase of offsets would correspond with the GHGs attributable to that particular project phase.

Thanks!

On Tuesday, October 18, 2016, Alejandro Huerta <alejandro.huerta@lacity.org> wrote:

Hi Kimberly,

Just to keep you in the loop re: Crossroads of the World carbon offset condition that you helped us with, it looks like the applicant wishes to do incremental purchases of the GHG credits. They'll reach out to me with proposed changes and I'll continue to keep you in the loop and ask for your help. See Heather's email below re: ARB's position about this proposed change.

Sincerely,

ALEJANDRO A. HUERTA

Los Angeles City Planning

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----- Forwarded message -----

From: **King, Heather@ARB** <Heather.King@arb.ca.gov>

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[Quoted text hidden]

[Quoted text hidden]

Kimberly Huangfu <kimberly.huangfu@lacity.org>
To: Alejandro Huerta <alejandro.huerta@lacity.org>

Mon, Oct 24, 2016 at 7:52 AM

Ok, thanks!

[Quoted text hidden]

King, Heather@ARB <Heather.King@arb.ca.gov>
To: Alejandro Huerta <alejandro.huerta@lacity.org>

Mon, Oct 24, 2016 at 10:09 AM

Hi Alejandro,

This language looks good to me. I think it achieves what we discussed with the applicant. Thanks for checking.

-Heather

From: Alejandro Huerta [alejandro.huerta@lacity.org]

Sent: Monday, October 24, 2016 7:38 AM

To: King, Heather@ARB

Subject: Re: AB900 Consultation for Crossroads Hollywood Project

Hello Heather,

Here are the latest changes to the Crossroads condition that our City Attorney has reviewed. Before we finalize, I wanted to show you the changes (underlined) and see if you had any final thoughts.

"Prior to issuance of any Certificate of Occupancy for any building in the Project, the Applicant or its successor shall enter into one or more contracts to purchase carbon credits from a qualified GHG emissions broker (to be selected from an accredited registry), which contract, together with any previous contracts for the purchase of carbon credits, shall evidence the purchase of carbon credits in an amount sufficient to offset the Operational Emissions attributable to such building in the Project as well as all previously constructed buildings in the Project and shall be calculated on a net present value basis for a 30-year useful life.

"Prior to execution of the contract(s), the Applicant and its consultant shall calculate the Operational Emissions, in accordance with the methodology described in the Applicant's "Application for Environmental Leadership Development Project", specifically the "Greenhouse Gas Emissions Methodology and Documentation" prepared by Eyestone Environmental.

"Once the City has had an opportunity to review and approve the methodology and associated calculations, the Applicant shall provide copies of the calculation methodology to the California Air Resources Board (CARB) and Governor's Office of Planning and Research (OPR), which is then subject to a determination signed by the Executive Officer of CARB pursuant to the procedures set forth in Section 6 of OPR's Guidelines. The City will issue a Certificate of Occupancy upon receipt of the following: (1) a fully executed copy of the carbon offset purchase agreement(s), (2) a final CARB Determination that the Project will not result in any net additional GHG emissions, and (3) a copy of OPR's Certification Letter for the Project."

ALEJANDRO A. HUERTA

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Major Projects<<https://ladcp.maps.arcgis.com/apps/MapJournal/index.html?appid=b06f97ccf94741fdaad27443013eea>>

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[<https://encrypted-tbn3.gstatic.com/images?q=tbn:ANd9GcR-Yjmy9UfIMi3sojk10iw3rBU57vPe3UTgCj7ntRkAXFefWwhv>]

On Tue, Oct 18, 2016 at 5:02 PM, King, Heather@ARB <Heather.King@arb.ca.gov<<mailto:Heather.King@arb.ca.gov>>>> wrote:

Hi, Alejandro.

I spoke with the Crossroads applicant and Eyestone representatives today, and they will be contacting you to discuss some edits to this language. They are interested in doing incremental purchases of GHG credits tied to each C of O, rather than all at once prior to first C of O. We at ARB are conceptually ok with this, but want to make sure that all parties agree to the final language.

I just wanted to give you a heads up that you may be hearing from them soon.

Thanks again,

-Heather

Heather King, AICP

Air Pollution Specialist, Sustainable Communities Policy and Planning Section

Air Quality Planning and Science Division

California Air Resources Board

heather.king@arb.ca.gov<<mailto:heather.king@arb.ca.gov>>

Ph. 916-322-0339<<tel:916-322-0339>>

From: Alejandro Huerta [<mailto:alejandro.huerta@lacity.org><<mailto:alejandro.huerta@lacity.org>>]

Sent: Thursday, October 13, 2016 2:56 PM

To: King, Heather@ARB

Subject: Re: AB900 Consultation for Crossroads Hollywood Project

Hi. Based on your conversation with Kimberly, below is the final draft condition. If you're okay with it, finalize it and let Eyestone Environmental know.

Prior to issuance of any Certificate of Occupancy for the Project, the Applicant or its successor shall enter into one or more contracts to purchase carbon credits from a qualified GHG emissions broker (to be selected from an accredited registry). The purchase of carbon credits shall be in an amount sufficient to offset the Operations Emission attributable to the Project and shall be calculated on a net present value basis for a 30-year useful life.

Prior to execution of the contract(s), the Applicant and its consultant shall calculate the Operations Emission, in accordance with the methodology described in Part 7 of the Applicant's "Application for Environmental Leadership Development Project", specifically Eyestone Environmental's August 2016 "Greenhouse Gas Emissions Methodology and Documentation".

Once the City has had an opportunity to review and approve the methodology and associated calculations, Applicant shall provide copies of the calculation methodology to the California Air Resources Board (CARB) and Governor's Office of Planning and Research (OPR), which is then subject to a determination signed by the Executive Officer of CARB pursuant to the procedures set forth in Section 6 of OPR's Guidelines. The City will issue a Certificate of Occupancy

upon receipt of the following: (1) a fully executed copy of the carbon offset purchase agreement(s), (2) a final CARB Determination that the Project will not result in any net additional GHG emissions, and (3) a copy of OPR's Certification Letter for the Project.

ALEJANDRO A. HUERTA

Los Angeles City Planning<<http://cityplanning.lacity.org/>>

Major Projects<<https://ladcp.maps.arcgis.com/apps/MapJournal/index.html?appid=b06f97ccf94741fdaad27443013eed1>>

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[Image removed by sender.]

On Thu, Oct 13, 2016 at 9:29 AM, King, Heather@ARB <Heather.King@arb.ca.gov<<mailto:Heather.King@arb.ca.gov>>>> wrote:

Good morning, Alejandro.

Thank you for sharing the revised language. It looks good, and we also prefer this approach to require all remaining GHG emissions be offset upfront.

Will this language appear in the Project's Conditions of Approval?

Will the City require the applicant to provide you with copies of executed contracts to purchase the carbon credits prior to issuing the Certificate of Occupancy? Is that how you will verify that this condition has been met?

It is our understanding that the applicant will follow the methodology proposed in their AB 900 application to estimate the GHG emissions, and we think this methodology is reasonable. We don't foresee a need for the applicant to change their methodology down the line.

Thanks again!

-Heather

Heather King, AICP

Air Pollution Specialist, Sustainable Communities Policy and Planning Section

Air Quality Planning and Science Division

California Air Resources Board

heather.king@arb.ca.gov<<mailto:heather.king@arb.ca.gov>>

Ph. 916-322-0339<<tel:916-322-0339>>

From: Alejandro Huerta [<mailto:alejandro.huerta@lacity.org><<mailto:alejandro.huerta@lacity.org>>]

Sent: Wednesday, October 12, 2016 5:49 PM

To: King, Heather@ARB

Subject: Re: AB900 Consultation for Crossroads Hollywood Project

Sure. Here is the draft language below. Let me know your thoughts.

Prior to issuance of any Certificate of Occupancy for the Project, the Applicant or its successor shall enter into one or more contracts to purchase carbon credits from a qualified GHG emissions broker, in an amount sufficient to offset the Operations Emission attributable to the Project (to be calculated on a net present value basis for a 30-year useful life, the estimated life of the Project, or other time period consistent with CARB-adopted standards for a project of this scale) to achieve zero-net emissions attributable to the Project.

Prior to execution of the contract(s), the Applicant and its consultant shall calculate the Operations Emission, based on reasonable projections using an industry-accepted or CARB-proscribed methodology, at the time Applicant purchases the carbon credits. Applicant shall afford the City an opportunity to review and approve its selection of an air quality consultant prior to calculation of the Operations Emission.

Once the City has had an opportunity to review and approve the methodology and associated calculations, Applicant shall provide courtesy copies of the calculation methodology to the CARB and the Governor's Office of Planning and Research.

ALEJANDRO A. HUERTA

Los Angeles City Planning<<http://cityplanning.lacity.org/>>

Major Projects<<https://ladcp.maps.arcgis.com/apps/MapJournal/index.html?appid=b06f97ccf94741fdaad27443013eed1>>

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On Wed, Oct 12, 2016 at 10:45 AM, King, Heather@ARB <Heather.King@arb.ca.gov<<mailto:Heather.King@arb.ca.gov>>> wrote:

Thanks very much for the update!

-Heather

From: Alejandro Huerta [<mailto:alejandro.huerta@lacity.org><<mailto:alejandro.huerta@lacity.org>>]

Sent: Wednesday, October 12, 2016 10:44 AM

To: King, Heather@ARB

Subject: Re: AB900 Consultation for Crossroads Hollywood Project

Hi Heather. Sarah and I met with the City Attorney yesterday, so we are working on proposed language.

ALEJANDRO A. HUERTA

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Major Projects<<https://ladcp.maps.arcgis.com/apps/MapJournal/index.html?appid=b06f97ccf94741fdaad27443013eed1>>

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On Wed, Oct 5, 2016 at 11:36 AM, Luciralia Ibarra <luciralia.ibarra@lacity.org<<mailto:luciralia.ibarra@lacity.org>>> wrote:
Thanks, Heather.

I have cc'd Alejandro and Sarah to keep them in the loop. We'll reach out once we've had a chance to meet with our City Attorneys.

Thank you,
Luci

On Wed, Oct 5, 2016 at 11:16 AM, King, Heather@ARB <Heather.King@arb.ca.gov<<mailto:Heather.King@arb.ca.gov>>> wrote:

Hi, Luci.

Thanks so much for your time today. I'm attaching a document that includes the applicant's proposed commitment language to purchase GHG offsets on pages 4-6 of the pdf (Commitment Letter). You can ignore the rest of the pdf.

We would like the applicant to modify #2 in the following way.

2. "No later than six (6) months after Project Stabilization, to be defined as the date following Project completion when the Project is 90 percent leased and occupied, or within one year from the issuance of a Temporary Certificate of Occupancy, whichever occurs first, the Project Sponsor shall...

Looking forward to hearing the City's feedback, if any, on how to make the commitment more enforceable. After we receive your input, we'll ask the applicant to revise the letter accordingly and re-submit this to OPR as an amendment to their AB 900 application. Let me know if you have any follow-up questions in the meantime.

Thanks again,
-Heather

Heather King, AICP

Air Pollution Specialist, Sustainable Communities Policy and Planning Section

Air Quality Planning and Science Division

California Air Resources Board

heather.king@arb.ca.gov<<mailto:heather.king@arb.ca.gov>>

Ph. 916-322-0339<<tel:916-322-0339>>

From: Luciralia Ibarra [<mailto:luciralia.ibarra@lacity.org><<mailto:luciralia.ibarra@lacity.org>>]

Sent: Tuesday, October 04, 2016 4:18 PM

To: King, Heather@ARB
Subject: Re: AB900 Consultation for Crossroads Hollywood Project

That works for me. Should I call you at the number in your email signature?
-Luci

On Tue, Oct 4, 2016 at 3:53 PM, King, Heather@ARB <Heather.King@arb.ca.gov<<mailto:Heather.King@arb.ca.gov>>>>
wrote:

Hi, Luci.

Thanks so much for getting back to me so quickly. Tomorrow morning would be great. I'm available any time. I'll suggest 10am, but let me know if you prefer a different time.

The call shouldn't take too long. Is [213.978.1378](tel:213.978.1378)<<tel:213.978.1378>> the best number to reach you?

Thanks again!
-Heather

From: Luciralia Ibarra [<mailto:luciralia.ibarra@lacity.org><<mailto:luciralia.ibarra@lacity.org>>]

Sent: Tuesday, October 04, 2016 10:55 AM

To: King, Heather@ARB

Subject: Re: AB900 Consultation for Crossroads Hollywood Project

Hi Heather,

Thank you for reaching out. We are familiar with the process as we currently have a project (8150 Sunset) utilizing AB900. We have uploaded the application materials, EIR comments, and uploaded regular updates of the Administrative Record to our planning website. I have time tomorrow morning to discuss if that works for you.

Thank you,
Luci

On Tue, Oct 4, 2016 at 10:21 AM, King, Heather@ARB <Heather.King@arb.ca.gov<<mailto:Heather.King@arb.ca.gov>>>>
wrote:

Good morning, Luciralia.

I am with the California Air Resources Board (ARB), and have been coordinating with the Project Sponsor for the Crossroads Hollywood Project on their application for CEQA streamlining under AB 900. The applicant's representatives provided your contact info at my request.

Are you familiar with the AB 900 certification by the Governor (https://www.opr.ca.gov/s_californiajobs.php)? ARB makes a determination regarding the project's analysis of greenhouse gas emissions as part of that process.

It's customary for ARB to consult with the Lead Agency on all AB 900 projects. I am hoping to arrange a time to chat with you about the project and about ARB's determination, as it relates to the certification for CEQA streamlining. Would you have 30 minutes to chat sometime today or tomorrow?

Thank you, and I look forward to talking with you.
-Heather

Heather King, AICP
Air Pollution Specialist, Sustainable Communities Policy and Planning Section
Air Quality Planning and Science Division
California Air Resources Board
heather.king@arb.ca.gov<<mailto:heather.king@arb.ca.gov>>
Ph. [916-322-0339](tel:916-322-0339)<<tel:916-322-0339>>

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Luciralia Ibarra | Senior City Planner

Major Projects | Department of City Planning | City of Los Angeles

luciralia.ibarra@lacity.org<<mailto:luciralia.ibarra@lacity.org>> | [213.978.1378](tel:213.978.1378)<<tel:213.978.1378>> |

213.978.1343<tel:213.978.1343> (f)

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Luciralia Ibarra | Senior City Planner

Major Projects | Department of City Planning | City of Los Angeles

luciralia.ibarra@lacity.org<mailto:luciralia.ibarra@lacity.org> | 213.978.1378<tel:213.978.1378> |

213.978.1343<tel:213.978.1343> (f)

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Luciralia Ibarra | Senior City Planner

Major Projects | Department of City Planning | City of Los Angeles

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213.978.1343<tel:213.978.1343> (f)

3 attachments

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~WRD000.jpg

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Alejandro Huerta <alejandro.huerta@lacity.org>
To: "King, Heather@ARB" <Heather.King@arb.ca.gov>

Mon, Oct 24, 2016 at 10:17 AM

Great, I'll let the applicant know.

ALEJANDRO A. HUERTA

Los Angeles City Planning

Major Projects

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Alejandro Huerta <alejandro.huerta@lacity.org>
To: "King, Heather@ARB" <Heather.King@arb.ca.gov>

Thu, Feb 2, 2017 at 2:35 PM

Hi Heather, I had a quick question. Could you please call me?

ALEJANDRO A. HUERTA

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