



# South Coast Air Quality Management District

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**FAXED: OCTOBER 31, 2006**

October 31, 2006

Ms. Juliana Prospero  
Los Angeles Unified School District  
Office of Environmental Health and Safety  
1055 West 7<sup>th</sup> Street, 9<sup>th</sup> Floor  
Los Angeles, CA 90017

Dear Ms. Prospero:

**Draft Environmental Impact Report (DEIR) for  
Valley Region High School No. 5  
September 2006**

The South Coast Air Quality Management District (SCAQMD) 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 in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The SCAQMD would be willing to work with the Lead Agency to address these issues and any other questions that may arise. Please contact James Koizumi, Air Quality Specialist – CEQA Section, at (909) 396-3234 if you have any questions regarding these comments.

Sincerely

Steve Smith  
Program Supervisor, CEQA Section  
Planning, Rule Development & Area Sources

Attachment

SS:CB:JK

LAC060912-03  
Control Number

## **Draft Environmental Impact Report (DEIR) for Valley Region High School No. 5**

### Health Risk Assessment (HRA)

- The Draft EIR did not include the appendices of the HRA. Although the modeling output files were eventually provided to SCAQMD staff, staff was not afforded the full 45 days mandated by CEQA to review the Draft EIR for the proposed project. The SCAQMD, therefore, requests that for all future CEQA documents, the lead agency provide at a minimum all electronic files related to the air quality analysis including, but not limited to: spreadsheets, modeling input and output files, emission factors, modeling assumptions, etc.
- A map that shows the proposed school site and the sources of toxic air contaminants is not included in the Draft EIR. The SCAQMD requests that the lead agency include an aerial photo with the proposed school site and the sources of toxic air contaminants in the draft CEQA document for all future school projects so that SCAQMD staff can verify that all toxic sources were appropriately included in the HRA analysis.
- The Draft EIR qualitatively addresses the health risks posed by potential toxic sources for adults and students, but does not present the actual health risk value results from the HRA. Since the HRA was not, apparently, circulated with the draft EIR, it is difficult for the public to understand the actual risks posed to students and teachers at the new high school. The Final EIR should summarize the actual health risk results from the HRA and compare those numbers with SCAQMD-recommended significance thresholds.

### CO Hotspots Analysis

- Page 3B-9 states that the BAAQMD screening procedure is utilized by the SCAQMD. SCAQMD staff does not utilize the BAAQMD CO hotspots screening procedure. SCAQMD staff suggests that CO hotspots be completed using CALINE4, but allows the BAAQMD CO hotspots screening procedure to be used as long as it is used correctly and the appropriate mobile source emission factors are used.
- Reported CO concentrations in the CO hotspots analysis start at 25 meters. The BAAQMD CEQA Guidance includes methodology to estimate CO concentrations at roadway edge. Since most streets in the City of San Fernando are expected to have sidewalks, CO concentrations should be estimated at the roadway edge. The Final EIR should include CO concentrations at the roadway edge in the CO Hotspots analysis.

### Localized Significance Threshold Analysis

- Page 3B-9 states that SCAQMD staff does not require air dispersion modeling of PM10 concentrations at sensitive receptor locations due to short-term construction emissions. For future reference, this is no longer true, since air dispersion modeling is required for short-term construction emissions under the localized significance threshold for projects larger than five acres. The SCAQMD acknowledges, however, that construction PM10 emissions were estimated using ISCST3 in the Draft EIR.
- Page 3B-9 states that detailed information on the air quality analyses and modeling data are provided in Appendix B of the Draft EIR. Only the modeling output files were provided in Appendix B of the Draft EIR. A description of construction operations (operating hours and

time lengths, numbers and types of equipment, construction activities, etc.) should be described. Methodology including source treatment, meteorology, conversion factors (including the NO to NO<sub>2</sub> conversion factor), etc. should be thoroughly described.

Conclusions should be presented and evaluated. The Final EIR should include the described documentation on the LST so that the public can evaluate the LST analysis.

- It appears based on the of 0.00075347 gram/second emission rate in the PM<sub>10</sub> LST output file, that only the fugitive dust emissions were modeled (138 sources x 0.00075347 gram/second emission rate x pound/453.59 gram x 3,600 second/hour x 8 hour/day = 6.60 lb/day). The LST PM<sub>10</sub> should include emissions from all onsite sources. Since the diesel exhaust PM<sub>10</sub> emissions are reported to be 2.10 pound/day, the total PM<sub>10</sub> emissions should be 8.70 pound/day (6.60 + 2.10), and therefore, the modeled emission rate should be 0.000993 gram/second (0.00075347 gram/second x 8.70/6.60). The Final EIR should include a PM<sub>10</sub> LST analysis that includes emissions from all onsite sources.