



South Coast Air Quality Management District

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FAXED: OCTOBER 26, 2005

October 26, 2005

Ms. Lynne Rodrian
State of California, Department of General Services
Real Estate Services Division
Environmental Services Section
P. O. Box 989052
West Sacramento, CA 95798-9052

**Draft Environmental Impact Report (DEIR) for
The Veterans Homes of California, West Los Angeles Project
(September 2005)**

Dear Ms. Rodrian:

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD would also like to thank the lead agency for allowing additional time to submit comments. 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 happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

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

Attachment
SS:CB
LAC050909-01
Control Number

**Draft Environmental Impact Report (DEIR) for
The Veterans Homes of California, West Los Angeles Project**

1. **Consistency with the Air Quality Management Plan:** The SCAQMD recommends two general criteria for project consistency. The first criterion is whether the project would result in an increase in the frequency or severity of existing air quality violations or contribute to new violations. The second criterion is whether the project would generate population and employment growth that would not exceed Southern California Association of Government's (SCAG) growth forecasts.

To determine whether or not a project will result in an increase in the frequency or severity of violations of the state or federal CO ambient air quality standards, CO hot spots analysis is typically performed. The lead agency did not perform a CO hotspots analysis for the proposed project, stating that the "traffic increases are very low and the background concentrations in the vicinity are also very low and therefore, the project would not contribute to an exceedance of any CO standard." The traffic analysis, however, shows that the intersection of Sawtelle Boulevard and Santa Monica Boulevard (intersection #12) will experience a decline in level of service (LOS) rating from C to D, with a corresponding volume to capacity ratio increase of 2.6 percent. The SCAQMD recommends that CO hotspots modeling be performed for intersections that experience a decline in LOS from C to D or an increase in volume to capacity ratio of two percent or more for intersections rated D or worse. Since intersection #12 meets both of these criteria, a CO hotspots analysis appears to be warranted. Until such an analysis is performed, the lead agency has not demonstrated that the proposed project is consistent with the AQMP pursuant to the first criterion identified above.

Further, on page 3-39 the lead agency states that the project is consistent with the growth projections for the subregion in which it is located. However, no information or data are provided to support this assertion.

2. **Construction Emissions:** Table 3-4 on page 3-36 is undecipherable as SCAQMD staff is unable to reconcile the results in this table with the URBEMIS 2002 printout in Appendix B. There is no explanation regarding how the earthmoving/grading emissions (323 pounds of PM10 per day) were derived. There is no corresponding figure in any of the URBEMIS 2002 printouts. Similarly, it is unclear what is meant by diesel powered equipment or how these numbers were derived as there are no corresponding results in the URBEMIS 2002 printouts. This same comment can be made for the trucks category. Finally, the lead agency omits any emission estimates for construction workers, especially considering that there will be 60 workers during the excavation phase up to 500 workers during the finishing phase. The Final EIR needs to include more information defining the construction categories and correlating the results to the URBEMIS 2002 spreadsheets in Appendix B.
3. **Daily Vehicle Trips and Operational Emissions:** The first page of Appendix B provides the information used to calculate mobile source emissions during operation. The analysis assumes an average vehicle ridership (AVR) of 1.1. The SCAQMD

recommends that this type of analysis be performed using an AVR of 1.0, unless the lead agency provides documentation supporting the assumption of a higher AVR.

4. **Mitigation Measures:** Although construction NO_x emissions exceed the significance threshold, as shown in Table 3-4 on page 3-36 of the DEIR, the lead agency proposes only one mitigation measure, i.e., AQ-14, turning off engines on equipment when not in use for longer than five minutes. Since the table shows significant NO_x emissions even after mitigation, SCAQMD staff recommends that the lead agency consider the following mitigation measures if feasible:

- Use alternative clean fuel such as electric or compressed natural gas-powered construction equipment with oxidation catalysts instead of gasoline- or diesel-powered engines. However, where diesel equipment has to be used because there are no practical alternatives, the construction contractor should use low-sulfur diesel, as defined in SCAQMD Rules 431.2, i.e., diesel with a sulfur content of 15 ppm by weight or less. The low-sulfur diesel has the potential to reduce NO_x emissions by 50 percent.
- Use aqueous or emulsified diesel fuel for construction equipment. Aqueous diesel fuels have received interim verification by the California Air Resources Board and show a reduction of 16 percent in NO_x and 60 percent in PM10 from diesel exhaust.
- Use electricity from power poles instead of temporary diesel- or gasoline-powered generators.