



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • www.aqmd.gov

FAXED: JUNE 16, 2006

June 16, 2006

Ms. Jessica Rappaport, CEQA Project Manager/Consultant  
Los Angeles Unified School District  
Office of Environmental Health and Safety  
1055 West Seventh Street, 9<sup>th</sup> Floor  
Los Angeles CA 90017

**Draft Environmental Impact Report (Draft EIR) for the Proposed Valley Region  
High School No. 4**

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 into 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 adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Susan Nakamura  
Planning & Rules Manager  
Planning, Rule Development & Area Sources

Attachment

SN:GM

LAC060427-10  
Control Number

### **Project Location and Site Characteristics**

1. On page 2.6, the lead agency describes a mix of surrounding land uses near the proposed project site including an existing school, residential and commercial uses. Although the Draft EIR includes aerial photographs (Figures 2-4 and 2-5), the specific business uses highlighted in Figure 2-5, however, are not specified, i.e., shopping center, gasoline station, medical buildings, hospital, etc. The large building and its use south-east of Devonshire Street and Balboa Boulevard is also not described in Figure 2-5. These uses should be stated in the Final EIR. In addition, the lead agency should include the name, description, and address of any SCAQMD permitted facility that is located within a quarter-mile radius from the proposed site under AB 3205. This could be included in Chapter 3C. Hazards and Hazardous Materials and as part of an appendix.

### **Construction Emissions**

2. On page 3B.8 in Section 3B.4.1 Methodology, the lead agency states that the URBEMIS model uses EMFAC7G emission factors to calculate on-road vehicle emissions and in Footnote 23, the lead agency cites the URBEMIS model version 7.5.0 as the URBEMIS model approved by the California Air Resources Board (CARB). In the Final EIR, the lead agency should revise the narration on page 3B.8 to reflect that the URBEMIS model actually uses EMFAC2002 emission factors, the most current version of emissions factors approved by CARB for estimating vehicle traffic emissions not emission factors from EMFAC7G. EMFAC2002 has been available for almost four years now and some of the pollutant emission factors in the EMFAC2002 model are substantially higher than comparable factors in the EMFAC7G model. Finally, since the modeling output sheets in Appendix B show the lead agency is using URBEMIS2002 Version 8.7.0 not Version 7.5.0, the lead agency should revise Footnote 23 to reflect Version 8.7.0 to be consistent with the actually version used to model project air quality impacts.
3. In Appendix E on page 10, the lead agency has changed the demolition truck hauling miles round trip from 30 to 7. In the Final EIR, the lead agency should explain the reason for the change and include the distance from the proposed site to the destination where the demolition materials will be disposed at.

### **Mitigation Measures**

4. In order to further reduce short-term (construction) air quality impacts from the proposed project, the SCAQMD staff recommends that the lead agency consider adding additional mitigation measures to further reduce construction air quality impacts from particulate matter (PM10) and oxides of nitrogen (NOx) from the proposed project, if applicable and feasible:

Recommended additions:

The following is a list of additional recommended mitigation measures to further reduce fugitive dust:

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Replace ground cover in disturbed areas as quickly as possible;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Apply non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- Pave road and road shoulders;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less;
- Prohibit all diesel trucks from idling in excess of five minutes, both on-site and off-site;
- Reroute construction trucks away from congested streets or sensitive receptor areas;
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site; and
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable.
- All vehicles and equipment will be properly tuned and maintained according to manufacturer's specifications;
- Use clean fuel construction equipment; emulsified diesel fuels; construction equipment that uses ultra-low sulfur diesel and is equipped with oxidation catalysts, particulate traps, or other retrofit technologies, etc.

### **Traffic Impact Study**

5. Although a CO hotspots analysis was completed for South Region High School No. 4 (SRHS No. 4); a CO hotspots analysis was not completed for the proposed Valley Region High School No.4 (VRHS No.4). In the Draft EIR, the lead agency states in Appendix A (Initial Study, Section 3.(d) Air Quality, page 11) that CO hotspots analyses completed in the program EIR (June 8, 2004) determined that it unlikely that any of the school projects would cause a significant CO hotspot impact. In order to be consistent between the specific EIR documents for SRHS No. 4 and the Draft EIR for the proposed project, the lead agency should discuss in the Final EIR why SRHS No. 4 would warrant a CO hotspots analysis while VRHS No. 4 does not.
  
6. In Appendix D (Traffic Impact Study) on page 20, the lead agency analyses eight intersections in Table 3 for existing (2005) traffic impacts by the proposed project during AM and PM peak hours. On page 53 in Table 10, the same eight intersections are evaluated for future (2010) traffic conditions with and without the project prior to mitigation. Both Table 3 and Table 10 contain Level of Service (LOS) and Volume to Capacity information to assist in evaluating traffic impacts on the eight intersections. In Table 13, however, the impacts of mitigation on two intersections (No. 1 Chatsworth Street at Louise Avenue and No. 3 Chatsworth Street and Hayvenhurst Avenue) are omitted including the LOS and V/C information for AM/PM peak hours that is used to determine if a CO hotspots analysis is warranted. Because two of the eight intersections were not listed in Table 10, the public and reviewing agencies are unable to evaluate the impacts of the proposed mitigation measures and therefore recommend that the information be included in the Final EIR.
  
7. The intersection listed below shows a decline in the level of service in the AM Peak Hour that would warrant a CO hotspots analysis. The SCAQMD recommends performing a CO hotspots analysis if the volume to capacity ratio increases by two percent or more as a result of a proposed project for intersections rated D or worse or if the LOS declines from C to D.
  - Devonshire Street at Balboa Boulevard shows an increase in the volume to capacity during the AM peak hour of greater than 3 percent;

Please refer to the most current Cal Trans guidance regarding performing a CO hotspots analysis. This information can be obtained at the following internet address:  
<http://www.dot.ca.gov/hq/env/air/coprot/htm> .

### **Hazards/Hazardous Materials**

8. In Appendix A (Initial Study) in Section 7(d) Hazards/Hazardous Materials on page 22, the Draft EIR describes the removal of two underground storage tanks (the type of fuel(s) is not specified) and that one underground storage tank remains on the site. The lead agency further states that the remaining underground storage tank may be reused or removed.
- a) It is recommended that the lead agency clarify whether or not the proposed project includes gasoline storage tanks and dispensing equipment. If so, the lead agency should cite compliance with SCAQMD Rule 461 - Gasoline Transfer and Dispensing in the Final EIR.
  - b) Since it is unclear if the storage tank will be removed or operated, the SCAQMD recommends that the lead agency evaluate the impacts from either option. It is unclear from the air quality analysis if impacts from removal (Option I) or reuse (Option II) were evaluated:

#### Option I

It is unclear if the potential excavation and removal of the storage tank was included in the air quality analysis.

- Estimate emissions from potential excavation and removal of storage tanks, **if not already included in emission estimates.**
- Include emissions from potential excavation and removal of storage tanks in construction LST analysis, **if not already included in LST analysis.**

#### Option II

- Identify combustion equipment associated with operation of storage tank.
- Estimate emissions from potential operation of storage tanks and associated combustion equipment.
- Evaluate LST impacts from potential operation of storage tanks and associated combustion equipment.
- Evaluate student, staff and off-site receptor health risk impacts associated with potential operation of storage tanks and associated combustion equipment.

9. If the lead agency encounters the presence of volatile organic compounds (VOCs) detected in soil and/or soil vapor in the project site during soil disturbance during the site preparation phase, which could occur in part during the removal of the remaining storage tank, the lead agency is reminded that the excavation of this soil would have the potential to be classified as a hazardous waste and that if soil is contaminated by hydrocarbon contaminants, contaminated sites would be subject to SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Compliance with Rule 1166 should be therefore be referenced in the Final EIR.

In addition, any air quality impacts associated with any remediation efforts including mobile source emissions should be quantified and included in the air quality analysis in the Final EIR.

### **Health Risk Assessment**

10. In the Initial Study in Section 3.(e) Air Quality on page 11, the lead agency states that a Health Risk Assessment (HRA) was conducted for land uses near the project site. Although the lead agency states on page 11 that “The assessment concluded that the health risks for adults and students were within acceptable limits”, the lead agency did not include even summary data for review by the public about the results of the HRA in Section 3C. Hazards and Hazardous Materials in the Draft EIR. Upon request, the lead agency did send the HRA to the SCAQMD staff for review. Since basic information concerning the HRA was not included with the Draft EIR, that technical information was not “readily available” pursuant to CEQA Guidelines §15147. The lead agency should include a discussion of the HRA and its results in the Final EIR.
11. Previous Draft EIRs from LAUSD included a map with the potential sources within ¼ mile of the proposed school site (see Figure 3B-1 in the Draft EIR for South Region High School No. 4, SCH No. 2005041116). No map was provided in the Draft EIR for VRHS No. 4. The Final EIR should include a map with the potential sources within ¼ mile of the proposed school site.
12. A list of the facilities surveyed and reasons why the facilities were included or excluded from the HRA was not provided in the Draft EIR. There are commercial buildings to the north, east and south of the proposed school site (Figure 2-5). However, it is unclear by comparing the facilities listed in the HRA to Figure 2-5, whether the lead agency included all facilities that emit toxic air contaminants (TACs) in the HRA from what is provided in the Draft EIR. The Final EIR should include a list of facilities that were surveyed but determined not to emit TACs, so that the public can verify that all sites that emit toxic air contaminants were included in the HRA.

**Localized Significance Thresholds**

13. LST analysis results are presented in the Draft EIR without documentation. The Draft EIR for South Region High School No. 4, SCH No. 2005041116 contained a LST analysis report by the Impact Science, Inc., who is the same consultant that prepared the Draft EIR for VRHS No. 4. The Final EIR for VRHS No. 4 should contain a LST analysis report that documents the assumptions, methodology and calculations used to estimate the LST impacts presented in the text of the EIR.