



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

February 23, 2023

vacoenvironment@va.gov

Glenn Elliott, Director – Environmental Program Office
U.S. Department of Veterans Affairs
Office of Construction & Facilities Management
810 Vermont Avenue, NW
Washington DC 20420

Draft Environmental Assessment (Draft EA) for the Proposed Land Transfer from the Sepulveda Ambulatory Care Center to the Los Angeles National Cemetery Project (Proposed Action)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The U.S. Department of Veterans Affairs is the National Environmental Policy Act (NEPA) Lead Agency for the Proposed Action. The following comments recommended revisions to the air quality analysis that the Lead Agency should include in the Final EA.

South Coast AQMD Staff's Summary of Project Information in the Draft EA

Based on the Draft EA, the Lead Agency proposes transferring approximately 26.4 acres of land from the Veterans Health Administration (VHA) Sepulveda Ambulatory Care Center (SACC) to the National Cemetery Administration (NCA) for the expansion of the Los Angeles National Cemetery (LANC).¹ Based on the aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (residence) is 70 feet east and north of the Proposed Action, and the Sepulveda VA Medical Center facility is adjacent to the west and south of the Proposed Action. The Proposed Action's construction is anticipated to last approximately 18 months.²

South Coast AQMD Staff's Comments on the Draft EA

Recommended Revision to the Air Quality Analysis

Based on the Draft EA, the NEPA Lead Agency quantifies the Proposed Action's annual emissions, compares those emissions to the General Conformity *de minimis* emissions thresholds, and summarizes the results in Table 5.³ As mentioned in the Draft EA, the Proposed Action also requires demolishing the existing golf course, baseball field, and associated infrastructure for the development of the cemetery.⁴ However, it is unclear if emissions (e.g., hauling truck emissions) associated with demolition activities are quantified in the construction emissions. If the demolition emissions are not quantified in the current analysis, South Coast AQMD staff recommends that

¹ Draft EA, Page 5.

² *Ibid.* Page 15.

³ *Ibid.* Page 17.

⁴ *Ibid.* Page 11.

the NEPA Lead Agency revise the air quality analysis and include the revision in the Final EA. In the event that the analysis in the Draft EA already included the demolition emissions, it is recommended that the Lead Agency provide all the emissions information and calculations in detail in the Final EA for clarification.

Conclusion

South Coast AQMD staff is available to work with the NEPA Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA-IGR

Planning, Rule Development & Implementation

SW:DN

LAC230126-02

Control Number