



South Coast Air Quality Management District

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Regional Environmental Quality Advisor (REQA) & Senior Asset Manager
Portfolio Management Division Capital Investment Branch (9PTC)
US General Services Administration (GSA)
450 Golden Gate Avenue
San Francisco, CA 94102

**Draft Environmental Impact Statement (Draft EIS) for the Proposed Los Angeles
FBI Federal Building, Los Angeles, California**

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 the additional time to submit comments. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Statement.

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 Statement. 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,

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

Attachment

SS:GM
LAC060301-05
Control Number

Construction/Operational Emission Impacts

1. With the exception of preparing a CO hotspots analysis, the lead agency has not quantified construction, including demolition, or operation emissions for the proposed project. In the case of construction air quality impacts, the lead agency simply concludes that construction impacts are significant, although mitigation measures are identified. In the case of operation air quality impacts, the lead agency concludes that the project will not generate CO hotspots. However, mass daily emissions from worker commute trips, area sources such as water heaters, etc., are not quantified and no conclusions are made.

On March 28, 2006, SCAQMD staff contacted the lead agency requesting any documentation of the proposed project's construction and operational impacts. The lead agency replied that the environmental contractor would respond to the SCAQMD's request but the response from the environmental contractor was that construction and operation air quality impacts were not quantified. Because the lead agency has not quantified construction and operation air quality impacts, the lead agency has not fulfilled its role to adequately disclose potential air quality impacts to the surrounding communities. Quantifying air quality impacts from construction and operation is also necessary to determine if any emissions from the project exceed any general conformity de minimis levels, which would then require a conformity determination pursuant to §176(c) (i) of the 1990 Amendments to the Clean Air Act.

To calculate the proposed project's emission impacts, the lead agency can utilize the current URBEMIS 2002 land use emissions model, which can be accessed at <http://www.aqmd.gov/ceqa/models.html> or follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook.

Local Air Quality Analysis

2. Because the proposed site is located less than a quarter-mile from existing residential sites, it is recommended that a localized air quality analysis be prepared to determine whether or not the residents in the existing residential sites are adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .
3. Once the lead agency quantifies construction, operation and localized air quality impacts, the SCAQMD requests that the document be recirculated for public review.