



South Coast
Air Quality Management District
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SENT VIA E-MAIL AND USPS:

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**Draft Environmental Impact Report for the
Long Beach Courthouse Demolition Project**

The South Coast Air Quality Management District (SCAQMD) staff 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 CEQA document. The Lead Agency plans to demolish and clear a 3.5 acre site and associated 8 story building. Demolition would either be carried out by traditional techniques or by implosion. Based on a review of the Draft EIR, the SCAQMD staff has several concerns regarding the potential air quality impacts of the Long Beach Courthouse Demolition.

On page 4.2-20, Toxic Air Contaminant Emissions, the Draft EIR states asbestos containing material (ACM) would "be identified and removed in accordance with federal and State abatement policies and procedures." SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities has more stringent identification and remediation guidelines than federal and State abatement policies and procedures. If ACM is identified by a Certified Asbestos Consultant (CAC), the Lead Agency must comply with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities prior to any demolition activity. Additionally, all supporting asbestos surveys, notifications, CAC certification and removal documentation should be provided with the Final EIR.

Mitigation Measure AQ1 does not identify how the Lead Agency will comply with SCAQMD Rule 401 – Visible Emissions and Rule 403 – Fugitive Dust. Specifically, Mitigation Measure AQ1 does not utilize any forms of dust suppression and fugitive dust control measures outlined in SCAQMD Rule 403. Furthermore, demolition by implosion is not exempt from any of the requirements of SCAQMD Rule 401 and 403. Please provide additional detailed information on the mitigation measures for both traditional and implosion demolition in the Final EIR.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final CEQA document associated with this project.

Sincerely,

Jillian Baker

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JB:JC
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