



South Coast Air Quality Management District

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

FAXED: OCTOBER 19, 2006

October 19, 2006

Ralph G. Appy, Ph.D.
Director of Environmental Management
Port of Los Angeles
425 South Palos Verdes Street
San Pedro, CA 90731

Dear Dr. Appy:

**Draft Environmental Impact Report (DEIR) for the
Southwest Marine Buildings Demolition Project
(ADP No. 050405-050)**

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 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:MK:CB

LAC060913-02
Control Number

**Draft Environmental Impact Report (DEIR) for the
Southwest Marine Buildings Demolition Project**

1. **Demolition Debris Disposal Site:** On page 3.10-7 of the DEIR, the lead agency states that the debris will be disposed at either the Port recycling facility on Terminal Island or to an off-site landfill. The DEIR provides an analysis based on disposal at the Port Recycling facility on Terminal island, but does not provide any details regarding the alternative site where the demolition debris would be dispatched to, should the recycling facility on Terminal Island become unavailable for the debris. Any site outside of Terminal Island where the demolition debris would be deposited would entail longer distances over which the trucks would travel further and therefore generate more diesel particulate emissions. By not estimating and including these emissions, a realistic “worst-case” scenario has not been evaluated and disclosed, and, thus, the emissions may have been underestimated. SCAQMD staff recommends that the emissions from this “worst-case” scenario be estimated and included in the Final EIR.

2. **Volume of Buildings to be Demolished:** On page 3.2-15 of the DEIR, the lead agency states that the buildings to be demolished range from 1 to 5 stories and that buildings are on average 20 feet high. The lead agency estimates on page 3.2-14 that it would take up to 500 truck trips to remove the demolition materials. However, the lead agency does not provide the basic data used in the calculations, i.e., the volume of buildings either in cubic feet or cubic yards to be demolished, upon which the 500 truck trips was based. In the absence of this data, SCAQMD staff is unable to verify the accuracy of the truck trips and corresponding truck emissions that would be involved in the disposal of the demolition debris. The SCAQMD recommends that this information be included in the Final EIR.

From SCAQMD staff estimations, assuming that the demolition of all the 16 buildings and seven cranes generate 134.4 pounds of PM10 as stated in Table 3.2-6 of the DEIR, it appears that 320,000 cubic feet or 11,852 cubic yards of demolition debris would be generated. Assuming that a heavy-duty truck carries a maximum of 20 cubic yards of materials, it would require about 593 truck trips to dispose off the demolition materials. This estimate exceeds the 500 truck trips anticipated by the lead agency in the DEIR. Please provide the data on the volume of buildings to be demolished so the actual potential truck emissions can be estimated and verified.