



South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

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Craig.chalfant@longbeach.gov

Craig Chalfant, Planner
Planning Bureau, Development Services Department
City of Long Beach
333 W. Ocean Boulevard, 5th Floor
Long Beach, CA 90802

**Draft Environmental Impact Report (Draft EIR) for the
Civic Center Project (SCH# 2015041054)**

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 three buildings and construct six new governmental and mixed use buildings. 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 Civic Center Project.

In the Air Quality Section, the lead agency quantified the project's construction and operation air quality impacts and compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds. Based on its analyses, the lead agency has determined that operational air quality impacts will exceed the recommended regional daily threshold for ROG emissions. Even with mitigation measures, the project related impacts to regional air quality would remain significant and unavoidable. The SCAQMD staff recommends additional mitigation measures that could be used to further reduce ROG emissions. Please see the attachment for more information.

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 Wong

Jillian Wong, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

JW:JC
LAC150805-02
Control Number
Attachment

Attachment

Air Quality Analysis

1. The lead agency failed to properly quantify PM emissions from implosion. CalEEMod estimates emissions from traditional demolition methods and does not quantify fugitive PM emissions from implosion. SCAQMD staff recommends the lead agency revise the air quality analysis to include the emissions from implosion demolition.

Mitigation Measure AQ-2 and the Air Quality Safety Plan do not identify how the lead agency will comply with SCAQMD Rule 401 – Visible Emissions and Rule 403 – Fugitive Dust. Specifically, Mitigation Measure AQ-2 does not utilize any form 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.

2. The lead agency states that construction-related daily emissions would not exceed any regional SCAQMD thresholds from criteria pollutants during any individual construction phases. However, the air quality impacts from construction are underestimated because the air quality analysis does not account for overlapping construction phases. For example, Phase One: Architectural Coating overlaps with Phase Three: Demolition, Grading, and Construction. SCAQMD staff recommends revising the air quality analysis to account for overlapping construction phases and comparing the peak impacts to SCAQMD's CEQA significance thresholds for construction.
3. The SCAQMD staff recommends that overlapping construction and operational air quality impacts starting in 2020 through project build out 2022 be estimated, compared with the recommended SCAQMD long-term operational thresholds of significance, and then included in the Final EIR. Based on SCAQMD staff review, Phase Four: Grading air quality impacts will overlap with the operational emissions generated from occupancy during Phase One and Two. Individually, construction and operational NOx impacts for these separate activities (Phase Four: Grading and Phases 1 & 2 Operations) were shown as less than significant. However, when the overlap phases are combined, the peak impact would exceed the SCAQMD's CEQA significance thresholds for operation.

Additional Mitigation Measures

During project operations, the lead agency has determined that project operation emissions are significant for ROG. Therefore, SCAQMD staff recommends additional mitigation measures to further reduce ROG emissions.

- Provide electric vehicle (EV) Charging Stations

It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Similar to the City of Los Angeles requirements for all new projects, the SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces include EV charging stations.¹ At a minimum, electrical panels should appropriately sized to allow for future expanded use.

- Provide outlets for electric and propane barbecues in residential areas.

¹ http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf