



## South Coast Air Quality Management District

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Exposition Metro Line Construction Authority  
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### **Final Environmental Impact Report (Final EIR) for the Proposed Exposition Corridor Transit Project Phase II**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff recognizes there are air quality benefits associated with electric mass transit projects such as the Exposition Corridor Phase II. The greater accessibility to public transportation that this project will provide is anticipated to reduce emissions to toxic air contaminants, criteria air pollutants, and greenhouse gases. Notwithstanding these long-term benefits, SCAQMD staff remains concerned with the significant short-term impacts associated with construction of the project.

While the Final EIR presents a more robust air quality analysis than that presented in the Draft EIR, the methodology presented for particulate matter and nitrogen dioxide localized air quality construction impacts in the Final EIR appear to be inconsistent with SCAQMD methodology. Hence, it is difficult to fully evaluate the localized air quality impacts to neighborhoods near the proposed construction sites particularly the maintenance facility.

The SCAQMD staff understands that the Final EIR concludes that regional air quality impacts from the proposed project's construction are expected to be significant. The Final EIR states that mitigation measures to reduce significant emissions from construction equipment (e.g., Tier 2+ engines, particulate traps) are infeasible. It should be noted that other Lead Agencies (such as the ports of Los Angeles and Long Beach<sup>1</sup>) have found that these measures are feasible and are required for all new projects. SCAQMD staff therefore strongly recommends that the Lead Agency consider either requiring these measures or, at a minimum, providing preferred status to construction

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<sup>1</sup> For example, see the EIR's for the Middle Harbor Redevelopment Project, the China Shipping Container Terminal Project, the Tra-Pac Container Terminal project, and the San Pedro Waterfront Development Project.

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contractors who utilize the cleanest burning construction equipment available. Additional incentives could also be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides up to \$60 million dollars to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:  
<http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

In conclusion, SCAQMD staff recommends that the Lead Agency consider the additional actions specified above to reduce significant construction-related emissions. Should you have any questions regarding these comments, feel free to contact me at (909) 396-3244.

Sincerely,



Ian MacMillan

Program Supervisor – CEQA Inter-Governmental Review  
South Coast Air Quality Management District

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