



South Coast Air Quality Management District



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SENT VIA E-MAIL AND USPS:

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Notice of Availability of Environmental Assessment for the Proposed Restoration of Historic Streetcar Service in Downtown Los Angeles 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 EA.

SCAQMD Staff's Summary of Project Description

The lead agency is proposing to construct and operate electrically powered streetcar service south of the intersection of State Routes 110 (SR-110) and 101 (SR-101), in downtown Los Angeles. The streetcar would begin at the corner of Hill and 1st Streets, and operate along Broadway, 11th Street, Figueroa Street, and 7th Street. The loop would be approximately 3.8 miles in length.¹

SCAQMD Staff's Summary of Air Quality Analysis

Upon review of the air quality analysis, SCAQMD staff found that the lead agency did not quantify regional or localized air quality impacts from the project's construction-related activities. Further, a Draft Environmental Impact Report (DEIR), completed in October 2016, found that construction of the proposed project would result in significant localized air quality impacts. Specifically, the DEIR found that the proposed project would exceed the SCAQMD's localized significance thresholds for NO_x, PM₁₀, and PM_{2.5} during construction.² Therefore, SCAQMD staff recommends the lead agency revise the air quality analysis to include the proposed project's potential regional and localized air quality impacts during construction and any necessary mitigation measures. A detailed list of construction-related mitigation measures is available at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.

Conclusion

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final environmental document. The SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist, at rdalbeck@aqmd.gov, if you have any questions regarding these comments.

Sincerely,

Daniel Garcia

Daniel Garcia

Program Supervisor

Planning, Rule Development & Area Sources

¹ Environmental Assessment. Section ES.3.2, *Executive Summary*, Page ES-7.

² Draft Environmental Impact Report for Restoration of Historic Streetcar Service in Downtown Los Angeles. Section 3.2, *Air Quality*, Table 3.2-8, Page 3.2-24.

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