

E-Mailed: April 14, 2011 ddooley@cityofwhittier.org

April 14, 2011

Mr. Don Dooley City of Whittier Community Development Department 13230 Penn Street Whittier, CA 90602

Review of the Draft Supplemental Environmental Impact Report (Draft EIR) for the Proposed Whittier Boulevard Specific Plan Amendment Project

The South Coast Air Quality Management District (AQMD) 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 Environmental Impact Report (final EIR) as appropriate.

The AQMD staff is concerned about the effectiveness of the project's mitigation measures applicable to construction related air quality impacts. Specifically, the lead agency relies on Mitigation Measures AQ-1 through AQ-4 to demonstrate that the proposed project will impose less than significant air quality impacts from construction activities. AQMD staff notes that Mitigation Measure AQ-4 is of particular importance because it requires all individual development proposals to demonstrate that their construction-related emissions are below the AQMD significance threshold thereby ensuring less than significant air quality impacts. Therefore, it is imperative that the leady agency clearly identify the AQMD significance thresholds referenced in the mitigation measure. As a result, the AQMD staff recommends that that the lead agency revise measure AQ-4 as follows:

AQ-4 Prior to issuance of grading permits, all individual development proposals under the WBSP Amendment shall be required to demonstrate that construction-related emissions would be below the SCAQMD's <u>Regional and Localized Construction Significance</u> Thresholds. If an individual development project is anticipated to exceed SCAQMD thresholds (based on URBEMIS or other appropriate modeling), the applicant shall be required to adjust the construction phasing and schedule to reduce emissions to a less than significant level.

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

In V. M. Mill.
Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review Planning, Rule Development & Area Sources

Attachment

IM:DG

LAC1103031-02 Control Number