



South Coast
Air Quality Management District
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E-mailed: November 8, 2011
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Review of the Final Environmental Impact Report (Final EIR)
for the Whittier Main Oilfield Development Project

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the final Environmental Impact Report (EIR) as appropriate.

Based on a review of the final EIR the AQMD staff is concerned about Mitigation Measure (MM) AQ-2b. Specifically, MM AQ-2b is designed to reduce regional NOX emissions (i.e., drilling engine emissions) from the project's operational activities, further; MM AQ-2b is structured to provide the lead agency flexibility in the mechanism that it uses to reduce the project's NOx emissions to insignificant levels. However, the AQMD staff is concerned that the mitigation measure may result in the lead agency using emissions offsets to reduce the project's NOx emissions, whereas, the use of offsets should be the last resort for reducing the project's NOx emissions impacts. Therefore, the AQMD staff recommends that the lead agency revise the last bullet of MM AQ-2b to read as follows:

Further reduce NOx emission by implementing the measures identified in the order of priority provided below (ie. 1-highest priority and 4-lowest priority). If the lead agency can feasibly achieve only a portion of the NOx emissions reductions with a higher priority measure, then it shall do so and make up the remaining NOx reductions with the next highest measure.

- 1. Electrify all or portions of the drilling rig engines to reduce NOx emissions to less than the threshold, and/or,*
- 2. Utilize Tier 4 engines on the drilling rig sufficient to reduce daily emissions to less than the thresholds, and/or*
- 3. Use Mobile Source Emissions Reduction Credits (MSERCs) consistent with the AQMD's policies and procedures for the use of emissions credits to mitigate significant air quality impacts, and/or*

4. *Purchasing emission offsets to reduce remaining NOx emissions to less than significant levels.*

The AQMD 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,



Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
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IM:DG

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