



Orange County  
Council of Governments  
Member Agencies

- Aliso Viejo
- Anaheim
- Brea
- Buena Park
- Costa Mesa
- Cypress
- Dana Point
- Fountain Valley
- Fullerton
- Garden Grove
- Huntington Beach
- Irvine
- La Habra
- La Palma
- Laguna Beach
- Laguna Hills
- Laguna Niguel
- Laguna Woods
- Lake Forest
- Los Alamitos
- Mission Viejo
- Newport Beach
- Orange
- Placentia
- Rancho Santa Margarita
- San Clemente
- San Juan Capistrano
- Santa Ana
- Seal Beach
- Stanton
- Tustin
- Villa Park
- Westminster
- Yorba Linda
- County of Orange
- OCTA
- TCA
- OC Sanitation District
- ISDOC
- South Coast AQMD

August 31, 2012

Dr. Barry Wallerstein  
South Coast Air quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

**Subject: Comments of the Draft 2012 Air Quality Management Plan and Notice of Preparation**

Dear Dr. Wallerstein:

The Orange County Council of Governments (OCCOG) welcomes its responsibility to comment on the Draft 2012 Air Quality Management Plan (AQMP) and Notice of Preparation (NOP). Additionally, efforts to reach out to Orange County local jurisdictions and stakeholders by the South Coast Air Quality Management District (AQMD) staff and yourself have been well received.

Given the timing of the 2012 AQMP comment period, the comments below have not been considered by the full OCCOG Board of Directors. The OCCOG Technical Advisory Committee and an ad-hoc group of local jurisdiction have reviewed the draft and their input is included below. We have also collaborated on further review with other stakeholders such as the Association of California Cities—Orange County. I believe these preliminary comments to be a reflective consensus review of OCCOG's 39 member agencies based on what we know to date. As additional information related to the AQMP is released, we may have additional comments.

1. OCCOG is concerned that some required documentation related to the AQMP is, as of the writing of this letter, still not available for review. Specifically the socio-economic report has yet to be released. This document is crucial for local jurisdictions to review. OCCOG requests that all AQMP support documents be released as soon as possible and that the public comment period be extended an additional 45-days to allow for required review and comment. While it is unclear as to when comments are officially due, we have been told by AQMD staff that comments received by August 31, 2012 will be responded to. OCCOG desires to have a response to our comments.

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2. The draft 2012 AQMP is required to address PM 2.5, not ozone, yet ozone is addressed throughout the draft 2012 AQMP. This is distractive to the primary review. It is recommended that the references to ozone and the proposed control measures to address ozone be postponed for further discussion of the 2015 AQMP.
3. Should the AQMP continue to include references to ozone and control measures, we strongly suggest that they are included in an appendix to the document and not in the AQMP itself. Further, OCCOG requests that it be clearly stated throughout the document and in any adopting resolution that the ozone control measures are strictly VOLUNTARY.
4. OCCOG is also interested in how ozone control measures will be addressed in the Draft Environmental Impact Report (DEIR). Since the ozone control measures are voluntary, they should not be included as mitigation measures in the DEIR but should be referenced in an appendix as Best Management Practices that can be voluntarily implemented.

Again, OCCOG appreciates the opportunity to provide preliminary comments on the 2012 AQMP and NOP. We look forward to working with AQMD on a final plan that balances environmental stewardship with the need for projects and programs needed to keep Orange County moving forward. We look forward to receiving your response to our comments.

Respectfully,



Leroy Mills  
OCCOG Chairman

cc: OCCOG Board of Directors