



August 23, 2022

Honorable Mayor Vinatieri and Council Members,

RE: Item 13 A--Comstock Development with concurrent, global Uptown Specific Plan Amendments

CEQA defines a "project" as "'the whole of the action' which has the potential for resulting in either a *direct* physical change in the environment, or a reasonably foreseeable *indirect* physical change in the environment'." All integral project components should, therefore, be assessed within the environmental analysis.

Tonight's agenda combines a *physical* project---the 52-unit complex at Philadelphia and Comstock---with another *programmatic* "project": amendments to development standards and definitions in the Uptown Specific Plan.

While the City did the required Initial Study and prepared a Mitigated Negative Declaration for the actual physical construction project, there has apparently been no environmental review of the potential significant effects associated with the proposed comprehensive amendments to the Uptown Specific Plan. It is our opinion that this analysis needs to be completed prior to any discussion or action that alters the framework of the USP. Changes in development types, standards, and densities within all four of the sections of the Plan carry implications for significant impacts independent of the physical apartment project.

The proposed amendments to the USP do not solely facilitate development of the proposed apartment complex, but encompass the entire area of the USP. (see Mitigated Negative Declaration, Attachment A) Thus, the adoption of something of this significance must have its environmental effects assessed and addressed via the appropriate review process. The original EIR of 2007 does not cover these amendments for purposes of any CEQA exemption because, when applied to the whole of the Uptown Specific Plan, the effects become cumulative and far-reaching.

Council Meeting: _____

Agenda Item No. _____

RECEIVED ON:

Please remove the Specific Plan amendments from tonight's consideration, adjust the Initial Study and prepare the necessary environmental documents to address the impacts of these global USP amendments as they apply to both this housing project and, most importantly, to the entire Specific Plan. Changing definitions and development standards for the whole Uptown area requires CEQA review of environmental consequences that could be substantially consequential to all of the residents in North-central Whittier.

The proposed apartment complex approvals can either comply with the existing USP or should wait until amendments have been adopted after proper environmental review.

Thank you for your attention to this important item.

Mary Gorman-Sullens, President