

December 11, 2008

Mr. Doug Ito
California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

Subject: GDC Comments on the CEQA Threshold Guidelines Process

Dear Mr. Ito:

Since June 2008, ENVIRON has represented the Green Developer's Coalition (GDC) on the South Coast Air Quality Management District (SCAQMD) California Environmental Quality Act (CEQA) Greenhouse Gas (GHG) threshold working group. The GDC consists of a group of developers that believe that large master planned communities can balance employment, housing, and shopping for new population centers, and can help meet California's sustainability and GHG emissions goals.

ENVIRON is submitting comments on the California Air Resources Board's (ARB's) process to develop Greenhouse Gas Thresholds of Significance under CEQA on the behalf of the GDC member companies.

The GHG Thresholds of Significance will have tremendous impact on the CEQA process in California. Although they are only advisory, they will likely be adopted or used by many, if not most, lead agencies in California for residential and commercial projects. Accordingly, they should be developed in a thoughtful and reasoned manner, where stakeholder input is solicited and considered. The timeline that ARB is proposing does not allow for meaningful public comment or for a reasonable review process to occur.

An outline of the proposed standards and measures was released to the public an hour before its presentation at 2PM on December 9th. No supporting documentation was released with this material, and only a small amount of supporting detail was discussed during the public workshop. ARB has asked for comments by December 16th, only 7 days after the December 9th presentation, and three days before the supporting data is released on December 19th, along with a new draft proposal.

It is unreasonable to expect meaningful comments from stakeholders within this abbreviated time period, and without supporting documentation. The comment period must be extended to allow enough time for stakeholders to provide informed and constructive comments to the ARB recommended performance standards. The comment period must also allow for the comprehensive review of supporting documents. As such, the GDC requests that ARB release supporting documentation, and then allow no less than 30 days after the release of this documentation for comments. If this 30 day time period falls over the Holiday Season, we request that an additional two weeks be provided.

Closing

We appreciate the opportunity to comment on the process involved in the development of the CEQA Thresholds of Significance, and look forward to ARB's favorable response.

Sincerely,

A handwritten signature in dark ink, appearing to read "Shari Beth Libicki". The signature is fluid and cursive, with the first name "Shari" being more prominent.

Shari Beth Libicki, Ph.D.
Global Air Quality Practice Area Leader

Cc: Kurt Kaperos
Mary Nichols