



COMMUNITY DEVELOPMENT DEPARTMENT
"Enhancing Quality of Life"

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January 9, 2009

Mr. Douglas Ito
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comments on the Preliminary Draft Staff Proposal for Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases

Dear Mr. Ito:

The City of Corona appreciates the opportunity to review and comment on the draft proposal for thresholds of significance for greenhouse gases under the California Environmental Quality Act as prepared by the California Air Resources Board. The City of Corona is an agency member of Western Riverside Council of Governments (WRCOG), which has been actively monitoring the State's progress on developing thresholds for Greenhouse Gases. The City of Corona concurs with the letter submitted by WRCOG dated January 5, 2009 as it relates to this topic. Additionally, the City of Corona would like to provide the following comments on the proposed performance standards and measures.

1. Performance Standards for Construction

The draft performance standards for construction recommend that at least 75% of non-hazardous construction and demolition debris be recycled and that commercial and residential projects use recycled materials for at least 20% of construction materials. The city's concern with these types of standards is the method of verification, especially during project construction. For example, the recycling of construction debris can only be verified by the project proponent once the debris is discarded. If and after the fact the minimum percentage required is not recycled, what type of penalty enforcement does the local agency have regarding non-compliance with the required mitigation? In dealing with other state and federal agencies (i.e California Department of Fish and Game, Army Corps of Engineers, California Water Quality Control, and Fish and Wildlife) they have the ability to enforce penalties if a project violates required standards or mitigation imposed by the agency. Will ARB be enforcing penalties for non-compliance if it receives such information from the local agency?

The city also has similar concern on verifying compliance when it comes to using recycled materials for construction. This standard once again can only be verified by the project proponent based on information submitted to the local agency. Field verification of the actual use of recycled material can be considered difficult.

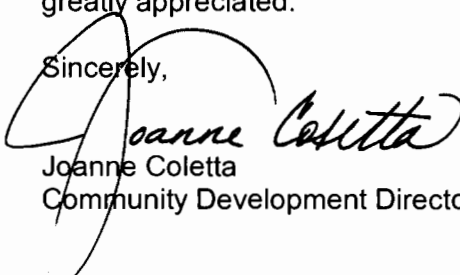
2. Performance Standard for Commercial Transportation

More information and clarification needs to be provided on the four required performance standards presented on the webcast. First, the performance standard that requires commercial transportation to be ½ mile of residential zone or neighborhood with an average density of at least 10 du/ac could likely prevent commercial infill development from occurring in low density residential neighborhoods, which are generally 4 to 6 du/ac and within an all commercial district that may already be zoned commercial and not within proximity to residential. The city is also not clear on what is considered neighborhood services since commercial transportation is also required to be ½ mile of at least 10 neighborhood services.

As suggested by WRCOG in their comment letter, consistency with SCAQMD's proposed thresholds should be considered. SCAQMD recommends a threshold of 3,000 MMTCO₂E for residential and commercial projects while no said threshold is considered by ARB, but only performance standards related to residential and commercial projects. SCAQMD also recommends a threshold of 10,000 MMTCO₂E for industrial projects as opposed to the 7,000 MMTCO₂E proposed by ARB. This type of inconsistency will leave local agencies and project proponents uncertain as to which standard to enforce for projects.

The City of Corona looks forward to reviewing ARB's revised draft on the Interim Significance Thresholds for Greenhouse Gases under CEQA. Your consideration of the comments submitted is greatly appreciated.

Sincerely,



Joanne Coletta
Community Development Director

CC: Brad Robbins, Corona City Manager
Barbara Spoonhour, WRCOG