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January 9, 2009

*By Electronic Submission*

Douglas Ito, Manager  
SIP & Local Government Strategies  
Air Resources Board  
1001 I Street  
Sacramento, CA 95812

*Re: Proposed CEQA Significance Thresholds for Greenhouse Gas Emissions*

Dear Mr. Ito:

This comment letter is submitted by the County of Orange (County), in its capacity as the owner and operator of John Wayne Airport (JWA or Airport). The Airport is located in Santa Ana, California, and is the only commercial service airport in the County and one of only two airports in the County that accommodate general aviation.

We have been monitoring Staff's development of greenhouse gas (GHG) emissions thresholds of significance under the California Environmental Quality Act (CEQA; Pub. Resources Code, §21000 et seq.), which Staff intends to present to the California Air Resources Board (CARB) for adoption on January 22, 2009. As you know, these thresholds are intended to serve as *recommendations* to the Office of Planning and Research, which is the agency responsible for amending the State CEQA Guidelines (Cal. Code Regs., tit. 14, §15000 et seq.) to address GHG emissions and global climate change pursuant to Senate Bill 97. This letter contains the County's written comments on the proposed significance thresholds, but only as those comments relate to the County's role as the owner and operator of JWA; this letter does not address any comments the County may have with regards to the application of the thresholds associated with other types of projects that the County may sponsor and/or serve as the lead agency for under CEQA.

Based on Staff's presentation at the December 9, 2008 public workshop, we understand that the proposed thresholds are sector specific and will be applicable only to industrial and commercial/residential projects. We believe that these thresholds are neither well-suited for, nor were intended for, application to airport projects. As a result, we would expect that appropriate

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Mr. Douglas Ito

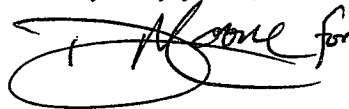
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GHG thresholds for airport projects will be defined at the regional and local levels. We would appreciate your confirmation of this understanding of the California Air Resources Board's approach to the establishment of thresholds of significance for GHG.

We look forward to hearing from you regarding the application of these significance thresholds to airport projects. Please do not hesitate to contact me should you have any questions regarding this letter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lori D. Ballance", with a stylized flourish at the end.

Lori D. Ballance

of

Gatzke Dillon & Ballance LLP

LDB:rlf

cc: Alan Murphy, Airport Director, John Wayne Airport  
Steve Smith, South Coast Air Quality Management District