

QUALITY PLANNING COALITION

Friday, December 15, 2006



Dr. Barry Wallerstein, Chief Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4178



**Subject: Recommended Substitute Measure for EGM-01,
Emission Reductions from New Development and Redevelopment**

Dear Dr. Wallerstein:



California
Business
Properties
Association



On behalf of the Quality Planning Coalition (QPC), a comprehensive group of community leaders and business organizations, we jointly support the attached proposal for EGM-01, Emission Reductions from New Development and Redevelopment, to provide quantifiable, enforceable, cost-effective emission reductions under the control of the project sponsor without the need for fees imposed when additional project-specific mitigation is otherwise infeasible. Our coalition is working together to secure a viable and cost-effective measure to reduce construction, building component and mobile source emissions related to new development and redevelopment. This proposal is based on the District's CEQA Approach for EGM-01 -- minus the proposed District fee. Our proposal calls for:

- **Enhanced use of the existing CEQA air quality impact review process.** This element of our proposal aims to reduce construction and on-site emissions from all projects that go through CEQA review, improve consistency and thoroughness of project mitigation across the basin, and provide quantifiable and enforceable project emission reductions.
- **A public outreach campaign promoting a toolbox of available, cost-effective clean air components for all new development.** Basic clean air building "toolboxes," recommended by the District in conjunction with local agencies and stakeholders, would address all new projects, including those that do not require environmental review. The campaign would bring together the District, local agencies that make project permitting and mitigation decisions, and project sponsors to achieve emission reductions through application to development projects large and small throughout the basin.



Los Angeles Area Chamber of Commerce



Orange County Taxpayers Association



- **An incentive program to promote clean air project features.**
The District, utilities and local governments are in a position to incentivize clean new development and redevelopment project designs to reduce emissions. Some of these incentives require only minimal financial resources.
- **Recognition of AQMP/SIP measures that address Mobile Source, Construction and Building Component Emission Reductions.**
Planned reductions in mobile source emissions are already reflected in the Transportation element of the Draft 2007 AQMP. To the extent they are realized, the growth distribution strategies that underpin the AQMP are estimated to provide 1.15 tons per day of 2020 mobile source ROG emission reductions in the Draft AQMP (Appendix IV-C, pages 8 and 43). In addition, the District and CARB have identified existing and proposed AQMP and State Implementation Plan rules and regulations that also address new development construction and on-site building operational emissions.

We strongly urge District Management and the District Governing Board to eliminate from further consideration the EGM-01 options in the first staff draft AQMP that call for residual fees based on the San Joaquin Valley Rule 9510 or other unspecified thresholds to be determined by SCAQMD. We oppose a residual SCAQMD fee, whether mandatory or voluntary. Combined with very low emission thresholds, such fees will force project sponsors to pay for future mobile source emissions that they cannot control and cannot feasibly mitigate through project changes. Other than the CEQA approach without a fee, the District's alternative new mitigation rules and fee options will also:

- Extend beyond CEQA's mitigation requirements,
- Overlap with and duplicate local traffic mitigation fee programs, CARB mobile source control regulations, and SCAG growth and transportation measures in the Draft AQMP, and
- Have the unintended consequences of discouraging cleaner new development, hurting affordable housing production counter to state mandates, and harming economic development in the Basin.



The QPC looks forward to working with you to revise EGM-01 to focus specifically on those emissions that project sponsors can control. We also look forward to working with the District, CARB and the business community to pursue broad-based mobile source emission reduction strategies for the region. We will continue to work with you, your staff, the Governing Board and the broader community of stakeholders to resolve this issue in the Final Draft AQMP to be released on January 12, 2007.



Sincerely,

REALTORS Committee on Air Quality



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President and CEO
Anaheim Chamber of Commerce

Jim Abrams, President and CEO
California Hotel & Lodging Association



Charles Isham, Executive Vice President
Apartment Association of Greater L.A.



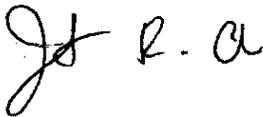
Jack Stewart, President
California Manufactures and Technology
Association



John Hakel, Vice President
Association of General Contractors



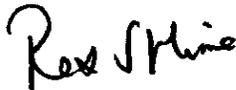
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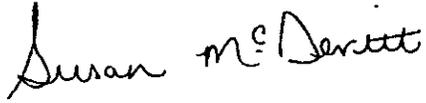
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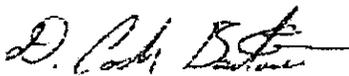
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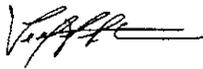
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