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County of Orange

Agencies

Costa Mesa Sanitary District
East Orange Water District
El Toro Water District
Irvine Ranch Water District
OC Sanitation District
OC Transportation Authority
OC Water District
Transportation Corridor Agencies

Interim Executive Director

Dennis R. Wilberg
949/470-3051
dwilberg@cityofmissionviejo.org

200 Civic Center
Mission Viejo, California 92691

November 19, 2008

Dr. Elaine Chang
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Re: Comments on the South Coast Proposed Rule 2301, Emission Reductions from New or Redevelopment Projects (PR 2301)

Dear Dr. Chang:

The Orange County Council of Governments (OCCOG) appreciates the opportunity to participate in the rule development process for PR 2301. Involvement by all stakeholders that will be affected by the proposed rule, including members of the OCCOG, is valued. We further believe stakeholder involvement is necessary to develop a rule that will be able to be effectively implemented and achieve the goals set forth in the 2007 Air Quality Management Plan, Environmental Growth Measure-01. Local governments, in particular, will play a crucial role in the implementation of the proposed rule. As such, the OCCOG thanks AQMD staff for maintaining an open process and requests that they continue to ensure that the adoption of the rule not be unnecessarily rushed. We ask that AQMD continue to ensure that all stakeholders are allowed adequate time to help develop the rule's language prior to your Board's consideration of its adoption.

Additionally, we have noted that as the development of the rule has progressed, there has been significant resistance by AQMD staff to develop rule language that would create a process by which the rule would be implemented through the existing environmental review process under the California Environmental Quality Act (CEQA). This existing environmental review process is already undertaken by local agencies throughout the District (and all of California). The CEQA process provides an efficient and appropriate avenue for both AQMD and local agencies to review the environmental impacts of projects and require mitigation of those impacts. The OCCOG Board of Directors maintains that it would be appropriate for the environmental impacts identified by PR 2301 to be evaluated under this existing CEQA process. Creation of new processes and procedures is unnecessary and inefficient. As such, the OCCOG fully and adamantly believes that any requirements for development projects that are established under Proposed Rule 2301, be integrated as part of the CEQA environmental process.

Dr. Elaine Chang
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Page 2

We look forward to continuing to work with you throughout the development of PR 2301.
Please let us know if you have any questions or would like any additional information.

Sincerely,

A handwritten signature in cursive script that reads "Cheryl Brothers".

Honorable Cheryl Brothers, Chair
Orange County Council of Governments
Board of Directors

CC: OCCOG Board of Directors
Carol Gomez, AQMD