



December 14, 2010

Board of Directors  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109

**Re: California Environmental Quality Act Thresholds and Guidelines**

Dear Board Members:

Greenbelt Alliance is the Bay Area's advocate for open spaces and vibrant places. For over 50 years, we have worked on protecting key open space areas and making the region's cities and towns more livable and sustainable. We are writing today to comment on the December, 2010 staff update on CEQA thresholds and guidelines for Risks and Hazards for New Receptors.

We greatly appreciate the Air District's work to protect and improve the health of the Bay Area's most at-risk communities. Greenbelt Alliance shares the goal of not placing communities that are already most at risk for air pollution-related health problems at further risk. At the same time, the negative health impacts of sprawl development and positive health benefits of infill development have also been well documented. Infill development reduces greenhouse gas and other air pollution by reducing Vehicle Miles Traveled, and leads to reduced obesity rates as residents have access to active transportation options. Air District staff is now proposing to make modest improvements to how the guidelines are implemented that will provide the same level of public health protection, while ensuring that the Guidelines and related technical support tools such as screening tables are not misused to impede infill development or affordable housing.

**Greenbelt Alliance strongly supports the staff proposal** to implement these activities, including clarification of the screening process on the District's CEQA webpage; updated screening tables for freeways and local roads; updated screening tables for stationary sources; updated guidance on project screening and modeling; convening a technical work group to solicit input on these and related documents, and; hosting additional workshops for local government staff to review progress in implementing the CEQA Guidelines. We also support the staff recommendation to set the effective date for the threshold of significance for risks and hazards for new receptors at May 1, 2011.

In order to prevent confusion on behalf of local lead agencies, **Greenbelt Alliance also recommends** that any information that will change over the coming months (e.g. screening tables and guidance on project screening and modeling) before the thresholds take effect be removed from Air District's website until the updated and final information is available.

Sincerely,

Stephanie Reyes, Policy Director

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