We are writing to inform the City of \_\_\_\_\_\_\_\_\_\_ about CalEPA’s proposed new vapor intrusion guidance, which could put a halt to a considerable amount of development in your city.  Here are brief highlights for your review.  We recommend that you contact the CalEPA’s Secretary, Jared Blumenfeld (Office of the Secretary: michelle.sinclair@calepa.ca.gov), to express your concerns and demand a complete public process to develop guidelines and regulations:

1. CalEPA’s agencies are enacting Environmental Screening Level (ESL) clean-up guidance that will thwart commercial/residential development in your city.
2. CalEPA is reducing certain clean-up limits by over 95% to the point where no remediation technology can achieve the new standards.
3. There is no current health crisis prompting this proposed change.
4. Contaminated sites can no longer be cleaned up to make way for housing or commercial development.  Until now, CalEPA issued No Further Action letters for similar sites for commercial/residential development using defensible, site-specific analyses.
5. The new standards are based on empirical EPA data from only six (6) locations throughout the state, but CalEPA has begun enforcing new standards anyway, even though research of much stricter vapor intrusion limits continues.
6. In many instances CalEPA is proposing to cease issuing No Further Action letters even after remediation is complete and vapor barriers are installed. The absence of NFAs will thwart debt financing for thousands of projects statewide.
7. Even though the ESL guidance is still being developed and no public participation has occurred, local environmental agencies have been told to stop using existing, conservative clean-up criteria, and many development projects have been brought to a halt.
8. There are 200,000 contaminated sites in California.  Many of these sites could be converted to commercial/residential facilities with appropriate remediation, but CalEPA’s standards will scare away any remediation projects, because the “how clean is clean” question is being obfuscated by CalEPA.
9. California is in a housing crisis.  Why is CalEPA exacerbating our situation without any consequential health benefits to the public?
10. Please ask CalEPA to stop their Environmental Screening Level science experiment immediately. Their review must undergo a complete public process to develop guidelines and regulations.