

**GARY A. LUCKS JD, CPEA**  
**PRINCIPAL**

**EDUCATION**

University of the Pacific, McGeorge School of Law: J.D., 1985  
Tulane University: B.S., Biology and Environmental Sciences (*Cum Laude*), 1982

**REGISTRATION**

Certified Professional Environmental Auditor, 2005  
California State Bar, 1985  
California Environmental Assessor, 1993

**SKILLS AND EXPERIENCE**

Mr. Lucks is a principal environmental attorney and scientist with 25 years of regulatory compliance and sustainability experience. He is a certified professional environmental auditor (CPEA) who advises clients on pollution prevention and sustainability strategies after exploring the multimedia regulatory compliance implications of these approaches. He also provides legal review and analysis for a variety of laws and regulations affecting the environmental permitting process and environmental auditing compliance. Mr. Lucks is also a co-founder of the Sustainable Earth Initiative, a non-profit specializing in environmental management systems (EMSs) and dedicated to helping public agencies improve their environmental performance.

Mr. Lucks' primary areas of expertise include statutory, regulatory, case law, and legislative research and analysis involving: compliance with air quality, solid and hazardous waste management laws; environmental permitting and audits of industrial facilities; compliance with the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA); and environmental property assessments associated with property transfers. Mr. Lucks' relevant experience includes involvement in the following projects.

***Environmental Audits:*** Mr. Lucks has led or participated in more than 200 major multimedia environmental health and safety compliance and management systems audits to assess internal compliance with environmental standards. The compliance audits included evaluation of compliance with California and federal rules governing hazardous waste management (under RCRA), hazardous materials, air quality, water quality, and other toxics requirements. He has managed or participated in on-site facility audits for oil refineries, semiconductor manufacturers, furniture manufacturers, breweries, wineries, industrial glass, ceramics and novelty manufacturers, electronics manufacturers, aerospace manufacturers and maintenance facilities, a food packing facility, beverage distributing facilities, smelting operations, Department of Defense Army bases, Air Force bases (using ECAMP), the National Aeronautics and Space Administration (NASA), the Federal Aviation Administration, the National Parks System, and the Los Angeles Unified School District. Mr. Lucks serves as the West Coast Chair of the Environmental Audit Roundtable.

***Environmental Permitting and Compliance:*** Mr. Lucks has managed a number of multi-media permitting, auditing, and regulatory analyses projects involving hazardous waste facilities, power plants, pipelines, chemical manufacturers, ports, refineries, and aerospace.

***Legislative Tracking:*** Mr. Lucks serves on the California State Bar Environmental Legislation Committee where he tracks and analyzes environmental legislation. He has published a regular environmental newsletter and lectured on California environmental legislation for the past 20

years. Mr. Lucks has served on the California State Bar Legislation Committee and Executive Committee since 1995.

***EH&S Training:*** For the past 20 years, Mr. Lucks has taught a variety of EH&S training courses at the University of California Berkeley, Davis, Santa Cruz, and Riverside campuses and for private industry as follows:

- Environmental Regulatory Framework (multimedia environmental courses on hazardous waste, air quality, and water quality) (University of California Berkeley and Davis campuses, Phillips Petroleum)
- Overview of Environmental Laws & Regulations (University of California Berkeley and Davis campuses, United States Air Force, East Bay Municipal Utility District (EBMUD), Golden Gate Paints Association)
- Hazardous Waste Refresher & Initial Training (University of California Davis and Berkeley, University of San Francisco, Lawrence Livermore National Laboratories, United States Air Force)
- Air Quality Regulatory Framework (University of California Berkeley and Davis campuses, University of San Francisco, United States Air Force)
- Site Assessment and Remediation (University of California Davis)
- Superfund, Brownfields, RCRA Corrective Action Remediation (University of California Davis)
- Storm water (United States Air Force)
- Water Quality (United States Air Force)
- Environmental Management Systems (University of California)
- Sustainability (NUMMI, University of California Davis and Berkeley, United States State Department)
- Environmental Auditing & Compliance (United States Air Force, Los Angeles Unified School District, University of California Hastings School of Law)
- Environmental Legislative & Regulatory Updates (University of California Davis, Riverside, Santa Cruz campuses, Pacific Gas & Electric, East Bay Municipal Water District)
- University of California Hastings School of Law and Tulane Law School (guest lecturing on environmental auditing)

***Sustainability and Environmental Management Systems:***

- Mr. Lucks led long-term sustainability strategies for auto manufacturers, bio-pharmaceutical, wineries, and cheese companies resulting in significant environmental and cost savings.

- Mr. Lucks developed approximately twenty environmental management systems (EMSs) for clients including Pacific Gas and Electric, Sonoma County Water Agency, Reno Tahoe Airport, Bureau of Reclamation, City of San Jose, Lawrence Berkeley National Laboratories, City of Glendale, and the United States Air Force installations and remote sites.
- Mr. Lucks led a study evaluating the feasibility of implementing EMS and integrated environmental, health and safety management systems in public school districts for the Los Angeles Unified School District and the United States Environmental Protection Agency.

### ***Compliance Management Systems:***

Mr. Lucks developed more than a dozen compliance-focused environmental management systems (EMSs) or Compliance Management Systems (CMSs) for the US Air Force installations throughout California and Hawaii. Mr. Lucks also led the development of five similar, but more comprehensive CMSs for Vandenberg Air Force Base and the Onizuka Air Station addressing hazardous waste management, water quality, lead, asbestos, polychlorinated biphenyls, pesticides, and radon. These CMSs were referred to as media-specific Compliance Action Plans that evaluated current compliance, and developed programmatic management systems and strategies to exceed compliance standards and go beyond environmental performance standards.

Mr. Lucks developed two dozen CMSs for a drinking water and waste water treatment operator in California. The CMSs addressed 1) management of change within the organizations; 2) assisted with proactive compliance management; and 3) and established clear documentation or responsibilities.

***Corporate Social Responsibility (CSR):*** Mr. Lucks completed a comprehensive analysis comparing the respective advantages and criteria for obtaining international certificates governing enhanced performance in environmental, labor, and human rights for Hewlett Packard. Mr. Lucks also served on a panel for the Environmental Audit Roundtable where he presented on the comparative benefits of the CSR standards.

***Pollution Prevention:*** Mr. Lucks has managed preparation of several solid waste management plans for the United States Navy. These plans characterized volumes of waste generated and developed pollution prevention strategies for reducing wastes generated and to improve recycling and composting.

### **Publications**

- 2008 California Environmental Law and Policy—A Practical Guide. Solano Press Publisher.
- “2007 Environmental Legislative Recap-- Budget Blues in a Light Green Year” *California Environmental Law Reporter* January 2008. Matthew Bender Publisher.
- “2006 Environmental Legislative Recap—Election Year Bonanza” *California Environmental Law Reporter* January 2007. Matthew Bender Publisher.
- “Environmental Compliance Auditing in California” chapter: *California Environmental law and Land Use Practice* treatise. Mathew Bender Publisher, 2006.
- Guide to California Environmental Law and Policy, 2006. Solano Press (publication date 2007).
- “2005 Environmental Legislative Recap—Special Election Fall Out” *California Environmental Law Reporter* December 2005. Matthew Bender Publisher.
- “2004 California Environmental Year in Review” February 2005. Specialty Technical Publishers.
- “2004 Environmental Legislative Recap—A Lightweight Year” *California Environmental Law Reporter* December 2004. Matthew Bender Publisher.

“2004 Environmental Legislative Forecast—Policy-making in the Wake of an Abrupt Transition” *California Environmental Law Reporter* May 2004. Matthew Bender Publisher.

An Early Lame Duck Session Comes to a Close—the 2004 Legislative Recap” *California Environmental Law Reporter* December 2003. Matthew Bender Publisher.

“The 2003 Environmental Legislative Forecast: A Fiscal Fiasco,” *California Environmental Law Reporter* April 2003. Matthew Bender Publisher.

“Legislative Recap-Election Year Restraint,” *California Environmental Law Reporter* December 2002. Matthew Bender Publisher.

“2002 California Environmental Year in Review” February 2003. Specialty Technical Publishers.

“2002 Environmental Legislation Forecast—Doing More with Less” *California Environmental Law Reporter* April 2002. Matthew Bender Publisher.

“California’s Toxic Mold Legislation” *California Environmental Law and Land Use Practice* treatise (June 2002).

“Toxic Mold” *California Environmental Law Reporter* September 2002. Matthew Bender Publisher.

“The 2001 Environmental Legislative Forecast: An Energy Obsession,” *California Environmental Law Reporter* April 2001. Matthew Bender Publisher.

“2001 Environmental Legislative Year in Review” February 2001 Specialty Technical Publishers.

“The 2000 Environmental Legislative Forecast: Preserving the Status Quo,” *California Environmental Law Reporter* March 2000. Matthew Bender Publisher.

“1999 Environmental Legislative Year in Review: A Prolific Year in the California Legislature” March 1999. Specialty Technical Publishers.

“The 1999 Environmental Legislative Forecast: Charting a Steady Course” *California Environmental Law Reporter* March 1999. Matthew Bender Publisher.

*The Comprehensive Guide to Hazardous Materials Enforcement & Liability*: A number of chapter updates on air quality law. Specialty Technical Publishers.

“1998 Legislative Forecast—An Era of Uncertainty and Change” *California Environmental Law Reporter*” April 1998. Matthew Bender Publisher.

*Brownfields Law & Practice—the Cleanup & Redevelopment of Contaminated Land* (chapter 22). March 1998. Matthew Bender Publisher.

“A Greener Legislature: The 1997 Environmental Forecast” *California Environmental Law Reporter* March 1997. Matthew Bender Publisher.

“The 1995 Legislative Session: A Forecast” *Environmental Law News* Spring 1995. California State Bar.

Drafted Air Quality Sections of the *Environmental Compliance A Simplified National Guide*) 1999 Specialty Technical Publishers.