

✘ California Lawyer has honored our Legal Planet colleague [Rick Frank](#) with a [California Lawyer Attorney of the Year \(CLAY\) award](#). Rick was honored together with [Richard Drury](#) for their work on behalf of Communities for a Better Environment in a challenge to the South Coast Air Quality Management District's approval of changes to an oil refinery. The pair won an important opinion from the California Supreme Court (Sean explained the decision and its significance [here](#)) affirming that environmental impact analysis under the California Environmental Quality Act must consider increases from the baseline of past actual emissions rather than potentially higher permitted emissions.

As the California Lawyer press release explains:

The decision is likely to have far-reaching ramifications beyond Southern California since *Communities for a Better Environment v. South Coast Air Quality Management District* sets new guidelines on how businesses throughout the state can proceed when proposing equipment modifications to their aging industrial facilities.

An excellent selection by the magazine. Congratulations, Rick and Richard!