

**Comment 1 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

First Name: Don

Last Name: Nelson

Email Address: dnelson@rockenergyllc.com

Affiliation: Rock Energy, LLC

Subject: CO2 significance threshold for heavy oil operations

Comment:

Please do not adopt your planned significance threshold of 7,000 metric tons of CO2 for California heavy oil projects. Please consider that huge amounts of undeveloped heavy oil reserves remain in California but these deposits must be heated with injection of steam from steam boilers to unlock the oil. The volume of CO2 created from California heavy oil operations was much, much higher 20 years ago. I hope you can make an exception for California heavy oil operations that uses a CO2 significance threshold based on CO2 levels from 20 years ago. If you held other industries to levels from 20 years ago, we can make much progress on reduction of CO2 emissions. Thank you!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-27 10:38:32

No Duplicates.

**Comment 2 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

First Name: Matt

Last Name: Vespa

Email Address: mvespa@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: Comments on Proposed Thresholds for GHGs

Comment:

Comments in attached document

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/2-cbd\\_\\_comments\\_arb\\_proposed\\_threshold\\_nov\\_2008.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/2-cbd__comments_arb_proposed_threshold_nov_2008.pdf)

Original File Name: CBD Comments ARB Proposed Threshold Nov 2008.pdf

Date and Time Comment Was Submitted: 2008-11-07 09:37:38

No Duplicates.

**Comment 3 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

First Name: Jessica  
Last Name: Range  
Email Address: jessica.range@sfgov.org  
Affiliation: SF Planning Department

Subject: Timeline for implementation  
Comment:

The latest message regarding CEQA thresholds of significance stated that final thresholds would be published in Early 2009. Can you provide me with more specifics on your implementation timeline?

Thank you,  
Jessica Range, LEED AP  
Environmental Planner  
San Francisco Planning Department

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-12 16:48:02

No Duplicates.

**Comment 4 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

First Name: Terri  
Last Name: Shirhall  
Email Address: tshirhall@roseville.ca.us  
Affiliation: City of Roseville

Subject: City of Roseville Comments re. ARB Guidance on CEQA Thresholds  
Comment:

Hello,  
The attached file is a comment letter from the City of Roseville regarding the proposed ARB Guidance on CEQA Thresholds. Thank you for your consideration of our thoughts and concerns.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/5-cityofroseville\\_comments111808.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/5-cityofroseville_comments111808.pdf)

Original File Name: CityofRoseville\_Comments111808.pdf

Date and Time Comment Was Submitted: 2008-11-18 09:32:19

No Duplicates.

**Comment 5 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

First Name: Terry  
Last Name: Dressler  
Email Address: lkimura@arb.ca.gov  
Affiliation: CAPCOA

Subject: Comments on ARB's Draft Proposed Significance Thresholds  
Comment:

Comments received from California Air Pollution Control Officers Association (CAPCOA) on ARB's Draft Proposed Significance Thresholds. See attachment.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/6-capcoa\\_letter\\_on\\_ceqa\\_11-14-08.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/6-capcoa_letter_on_ceqa_11-14-08.pdf)

Original File Name: CAPCOA Letter on CEQA 11-14-08.pdf

Date and Time Comment Was Submitted: 2008-11-20 11:02:12

No Duplicates.

**Comment 6 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

First Name: David  
Last Name: Tanner  
Email Address: dave@earsi.com  
Affiliation:

Subject: GHG Thresholds  
Comment:

See Attached comment

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/7-earsi\\_comments\\_to\\_arb\\_on\\_draft\\_thresholds.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/7-earsi_comments_to_arb_on_draft_thresholds.doc)

Original File Name: EARSi Comments to ARB on Draft Thresholds.doc

Date and Time Comment Was Submitted: 2008-11-20 12:29:44

No Duplicates.

**Comment 7 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

First Name: Charles (Chuck)  
Last Name: White  
Email Address: cwhite1@wm.com  
Affiliation: SWICS

Subject: Comments on CEQA Significance Thresholds  
Comment:

Comments Attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/8-final\\_swics\\_ceqa\\_letter\\_112108.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/8-final_swics_ceqa_letter_112108.pdf)

Original File Name: Final SWICS CEQA Letter 112108.pdf

Date and Time Comment Was Submitted: 2008-11-21 16:01:04

No Duplicates.

**Comment 8 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

First Name: Tom  
Last Name: Frantz  
Email Address: ini@lightspeed.net  
Affiliation: Association of Irrigated Residents

Subject: CEQA and AB 32  
Comment:

Tom Frantz  
Environmental Justice Advisory Committee member for AB 32  
President, Association of Irrigated Residents  
San Joaquin Valley resident

Please see attachment

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/9-tom\\_frantz\\_comments\\_on\\_ceqa\\_for\\_ab\\_32.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/9-tom_frantz_comments_on_ceqa_for_ab_32.doc)

Original File Name: Tom Frantz comments on CEQA for AB 32.doc

Date and Time Comment Was Submitted: 2008-11-23 10:59:52

No Duplicates.



**Comment 9 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

**Comment 10 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

First Name: Nicole  
Last Name: Vermilion  
Email Address: nvermilion@planningcenter.com  
Affiliation: The Planning Center

Subject: Comments on CARB's CEQA Significance Thresholds  
Comment:

Please see attached comments on CARB's Preliminary Draft Staff Proposal, Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/11-tpccmtscarbthrshlds.pdf>

Original File Name: TPCcmtsCARBThrshlds.pdf

Date and Time Comment Was Submitted: 2008-11-26 10:13:37

No Duplicates.

**Comment 11 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

First Name: Bill

Last Name: Higgins

Email Address: mmckelvey@cacities.org

Affiliation: League of California Cities

Subject: Comments on the Draft Proposed Significance Thresholds

Comment:

Please see the attached comments.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/12-comments\\_arb\\_significance\\_threshold\\_10.26.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/12-comments_arb_significance_threshold_10.26.pdf)

Original File Name: Comments ARB Significance Threshold 10.26.pdf

Date and Time Comment Was Submitted: 2008-11-26 10:16:48

No Duplicates.

**Comment 12 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

First Name: John  
Last Name: Andrew  
Email Address: jandrew@water.ca.gov  
Affiliation: DWR

Subject: threshold significance for CEQA  
Comment:

Please see attached letter. Thank you for the opportunity to comment.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/13-ghg\\_threshold\\_comment\\_letter-dwr.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/13-ghg_threshold_comment_letter-dwr.pdf)

Original File Name: GHG threshold comment letter-DWR.pdf

Date and Time Comment Was Submitted: 2008-11-26 11:01:54

No Duplicates.

**Comment 13 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

First Name: Kristin  
Last Name: Grenfell  
Email Address: kgrenfell@nrdc.org  
Affiliation: NRDC

Subject: NRDC Comments  
Comment:

NRDC respectfully submits these comments.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/14-nrdc\\_comments\\_to\\_carb\\_on\\_ceqa\\_thresholds\\_-\\_general.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/14-nrdc_comments_to_carb_on_ceqa_thresholds_-_general.pdf)

Original File Name: NRDC Comments to CARB on CEQA Thresholds - General.pdf

Date and Time Comment Was Submitted: 2008-11-26 11:06:47

No Duplicates.

**Comment 14 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

**Comment 15 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

First Name: Shari  
Last Name: Libicki  
Email Address: slibicki@Environcorp.com  
Affiliation:

Subject: CEQA Comments  
Comment:

See attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/16-arb\\_ghg\\_threshold\\_comment\\_ltr\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/16-arb_ghg_threshold_comment_ltr_final.pdf)

Original File Name: ARB GHG Threshold Comment Ltr FINAL.pdf

Date and Time Comment Was Submitted: 2008-11-26 15:24:26

No Duplicates.

**Comment 16 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

First Name: Matt  
Last Name: Vander Sluis  
Email Address: mvander@pcl.org  
Affiliation: Planning and Conservation League

Subject: Comments on ARB's Proposed GHG Thresholds  
Comment:

We appreciate the opportunity to submit the attached comments on ARB's proposed GHG Thresholds. If you have any questions, please contact:

Matt Vander Sluis  
(916) 313-4515  
mvander@pcl.org

Thanks,  
Matt Vander Sluis  
Planning and Conservation League  
Global Warming Program Manager

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/17-pcl\\_comments\\_on\\_arb\\_proposed\\_threshold.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/17-pcl_comments_on_arb_proposed_threshold.pdf)

Original File Name: PCL Comments on ARB Proposed Threshold.pdf

Date and Time Comment Was Submitted: 2008-11-26 16:54:40

No Duplicates.



**Comment 17 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

First Name: Dorothy  
Last Name: Rothrock  
Email Address: drothrock@cmta.net  
Affiliation: AB32 Implementation Group

Subject: Comments of AB32IG  
Comment:

Attached are comments of AB32IG

Submitted by:  
Dorothy Rothrock  
California Manufacturers & Technology Association  
Co-Chair, AB32 Implementation Group

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/18-ab32ig\\_ceqa\\_ltr\\_nichols.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/18-ab32ig_ceqa_ltr_nichols.doc)

Original File Name: AB32IG CEQA Ltr Nichols.doc

Date and Time Comment Was Submitted: 2008-11-26 20:25:13

No Duplicates.

**Comment 18 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

First Name: Gretchen

Last Name: Hardison

Email Address: gretchen.hardison@lacity.org

Affiliation: City of Los Angeles

Subject: Comments on Draft Interim CEQA Thresholds

Comment:

Please see the attached comments from City of Los Angeles staff on the approach to statewide CEQA thresholds for GHG emissions. For further information, please contact me at the e-mail or phone listed above.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/19-arb\\_ceqa\\_ghg\\_thresholds\\_11-26-08\\_cmt\\_ltr.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/19-arb_ceqa_ghg_thresholds_11-26-08_cmt_ltr.pdf)

Original File Name: ARB CEQA GHG thresholds 11-26-08 cmt ltr.pdf

Date and Time Comment Was Submitted: 2008-12-01 13:13:19

No Duplicates.

**Comment 19 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

First Name: Richard  
Last Name: Lyon  
Email Address: rlyon@cbia.org  
Affiliation: CBIA

Subject: CEQA Comments  
Comment:

See attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/20-cbia\\_comment\\_letter\\_re\\_carb\\_ceqa\\_ghg\\_threshold\\_proposal\\_11\\_25\\_08.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/20-cbia_comment_letter_re_carb_ceqa_ghg_threshold_proposal_11_25_08.doc)

Original File Name: CBIA Comment Letter Re CARB CEQA GHG Threshold Proposal 11 25 08.DOC

Date and Time Comment Was Submitted: 2008-12-02 09:08:35

No Duplicates.

**Comment 20 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

First Name: Daniel  
Last Name: Rockholt  
Email Address: drockholt@co.riverside.ca.us  
Affiliation: Riverside County Waste Management

Subject: CEQA Comments  
Comment:

See attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/21-riverside\\_co\\_waste\\_management.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/21-riverside_co_waste_management.pdf)

Original File Name: Riverside Co Waste management.pdf

Date and Time Comment Was Submitted: 2008-12-02 09:12:09

No Duplicates.

**Comment 21 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

First Name: Linda  
Last Name: Krop  
Email Address: LKrop@EDCnet.org  
Affiliation: Environmental Defense Center

Subject: Submission of Comments  
Comment:

Greetings:  
I received a copy of the Preliminary Draft Proposal - Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the CEQA. The document solicits public comment but fails to provide a comment deadline or instructions for submitting comments. I am in the process of reviewing the proposal and intend to submit comments. I just learned today that the comment deadline was supposed to be November 26. Since this information is not provided in the Proposal itself, I hereby ask you to re-notice this matter and extend the deadline for public comment.  
Sincerely,  
Linda Krop, Chief Counsel  
Environmental Defense Center

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 16:20:18

No Duplicates.

**Comment 22 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 1st Workshop.**

First Name: Paul

Last Name: Cort

Email Address: pcort@earthjustice.org

Affiliation: Earthjustice

Subject: Comments on Draft CEQA Threshold Recommendations

Comment:

Please find comments attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/23-ceqa\\_threshold\\_comments\\_to\\_arb.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/23-ceqa_threshold_comments_to_arb.pdf)

Original File Name: CEQA threshold comments to ARB.pdf

Date and Time Comment Was Submitted: 2008-12-08 15:54:06

No Duplicates.

**Comment 23 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: bob  
Last Name: boughton  
Email Address: bboughto@dtsc.ca.gov  
Affiliation:

Subject: general question  
Comment:

We are working on remediation of contaminated sites and figuring out ways to foster "green" technologies and greener cleanups. So how does a site clean-up fit in all this? We may only be considering the site clean-up activities or may also include the development afterward. Are you looking to encourage brownfield development with incentives? Your proposal may inhibit the recovery of brownfields to industrial, commercial, residential or other beneficial uses.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 16:32:15

No Duplicates.

**Comment 24 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: John  
Last Name: Friedrich  
Email Address: sierrajohn@mac.com  
Affiliation:

Subject: Raise land use emission reduction targets in AB 32 scoping plan  
Comment:

letter attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/25-john\\_f\\_ab32\\_scoping\\_comments.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/25-john_f_ab32_scoping_comments.doc)

Original File Name: John F AB32 scoping comments.doc

Date and Time Comment Was Submitted: 2008-12-10 13:00:05

No Duplicates.



**Comment 25 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: annie  
Last Name: steele  
Email Address: annies@kcbx.net  
Affiliation: pray sierra club, Canaries, Surfridder

Subject: Green house gases  
Comment:

I want to expand my comment with some pictures of the area and to do spelling checks for the record.

Air quality in the coast Dunes formation in san Luis

Obispo Coast is a serious problem.  
One million vehicles are on our beach during a callandar year. That so my science orientated friends equals about 28,000,000 pounds of green houses.

This is count of the vehicles paying to enter our beach. one type of flatbody extension maybe 6 to 12 ATV (3 or 4 wheel) vehicles that will be moving on our beach. They in turn will burn fuel... gasoline.

Green houses also come from the Containers brought onto the beach to be poured into these ATV's.

Spillage as the transfer happens is also available to the environment... air and beach sand. A thousand or more gallons

Carbon in the thousands of pounds is also airbourne

Down wind

many people have serious breathing lung problems

for which medical treatment has not worked.

annies@kcbx.net

2 of three my message annies@kcbx.net

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 15:10:44

No Duplicates.

**Comment 26 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Mike

Last Name: Frantz

Email Address: MikeJFrantz@socal.rr.com

Affiliation:

Subject: Global Warming Solutions Act, Assembly bill 32

Comment:

I am among I am sure most of the state who feel implementing this for one thing is a bad idea. For another thing to do this at THIS time with the budget deficit, bad climate for business, bad economy, etc. is insane! I am quoting from an article in the Orange County Register in the opinion section titled "Wrong plan at wrong time". "The Air Resources Board meets today to vote on the plan. But six highly regarded economic experts commissioned by the agency found its economic projections significantly underestimated costs. One reviewer said the projections give "the appearance of justifying" the regulations "rather than evaluating" them. Another criticized the rosy projections for leaving the erroneous impression of a "free lunch," when great costs are involved. The state's independent Legislative Analyst's Office also found the resource board's projections flawed by "a lack of analytical rigor."" Global warming alarmists have people so worked up they will believe anything but common sense! This also from the same article - "These economically disastrous proposals are advanced on the unreasonable fear of global warming, something that hasn't occurred for almost a decade. As Dr. David Gee, chairman of the 2008 International Geological Congress, put it: "For how many years must the planet cool before we begin to understand that the planet is not warming?" Now, I am not a scientist, I just have a logical mind to work with. If the planet in the past cooled and warmed without us, it surely will with us. But, with that being said, when is the last time you heard anyone say ANYTHING in the media or anywhere about the hole in the ozone layer????

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-11 10:33:23

No Duplicates.

**Comment 27 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Shari  
Last Name: Libicki  
Email Address: slibicki@environcorp.com  
Affiliation:

Subject: Comment Period  
Comment:

See attached file

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/28-gdc\\_comments\\_20081211.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/28-gdc_comments_20081211.pdf)

Original File Name: GDC Comments 20081211.pdf

Date and Time Comment Was Submitted: 2008-12-11 14:01:32

No Duplicates.

**Comment 28 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Ralph  
Last Name: Wedge  
Email Address: ralphwedge@gmail.com  
Affiliation:

Subject: AB 32 Scoping Plan  
Comment:

December 12, 2008  
Ms. Mary Nichols  
Chair, California Air Resources Board  
1001 I Street  
Sacramento, CA 95814  
<http://www.arb.ca.gov/lispub/comm/bclist.php>

Dear Ms. Nichols:  
As a small business owner I am very concerned about the current state of the economy and my ability to maintain and grow my business. California already imposes a number of taxes on businesses and while I think it is important to protect the environment it must not come at the expense of the growing the economy. Like many small businesses these difficult times force us to make difficult decisions. I do not want to lay off workers or reduce salaries or benefits, but if I am saddled with higher energy costs, additional taxes and fees I will have to make some tough choices.

As you consider the best way to implement California's climate change program, I urge you to take into account California's struggling small businesses. The proposed plan your agency has put forth increases taxes, energy costs, fuel costs, vehicle costs and building costs, which will all hurt small businesses. In addition, many of the implementation measures you are suggesting require billions of dollars in capital investments and annual operating cost increases. Many of us cannot afford the required upfront investments and do not have the luxury of waiting several years to see returns on these investments. I encourage you to adopt a balanced, cost-effective climate change plan that does not impose an impossible burden on small businesses and consumers. By using the most cost-effective strategies to minimize greenhouse gas emissions we can reduce global warming while also protecting California's companies, jobs and the economy.  
Sincerely,  
Ralph Wedge  
President Wedge Roofing Inc.  
5 Casa Grande Rd.  
Petaluma Ca. 94954

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-12 07:53:50

No Duplicates.

**Comment 29 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: william

Last Name: schmit

Email Address: wschmit@winespectrum.com

Affiliation:

Subject: History lesson for CARB

Comment:

I hope you all get a copy of Chris Paine's movie "Who Killed the Electric Car" for Christmas

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-12 08:31:25

No Duplicates.

## **Comment 30 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Richard  
Last Name: Wheeler  
Email Address: rwheeler@surewest.net  
Affiliation:

Subject: Destructive Forest Management  
Comment:

Forest Land occupies about 40% of California and it is being mismanaged or not being managed at all.

I was a Professional Forester for 58 years. Forest Management and Forest Product Production i.e. Timber Harvesting is an Agricultural Practice not a project that is changing the character or use of the land.

I recently questioned the CDF about Overcutting of Forest Land and they had no records of any overcutting. The California Forest Practice Act requires reforestation of Clear Cuts, so that is not overcutting.

I also questioned the amount of Erosion as Overcutting and Erosion are the two most important so-called Impacts on Forest Land. They answered that all of their studies showed there was NO SIGNIFICANT EROSION due to Timber Harvesting.

An Investigation of the Archeological Centers Reports and Inventory would reveal that few if any of the Sites that have been recorded meet the description of Historical or Archeological Sites as defined in EPA or CEQA. They have been recorded because otherwise your Timber Harvesting Plan would not be recorded. Damaged sites do not qualify as Historical or Archeological Sites. Mining ditches made into roads are no longer historical sites.

There is no real evidence that Timber Harvesting affects any Wildlife as only about 1% of Forest Land is harvested per year, meaning 99% is left undisturbed for wildlife and Oxygen Production.

On the other hand, Carbon Dioxide has been increased by the lack of effective and efficient Forest Fire Fighting. Air Tankers and Fire Truck just don't cut it!

And the number of Dead & Dying Trees create more Carbon Dioxide as they cannot not be gathered or salvaged due to the expense of the Harvesting Permit.

Such a permit in California costs 3X as much as one in Oregon, that's why Oregon is shipping in most of the lumber. This situation has reduced the Forest Product Economy by 78% costing Billion of Dollars of Income to California along with thousands, maybe hundreds of thousands of jobs.

Deforestation is increasing as Judges determine that Burned Areas can not be planted to Forest Seedlings and produce more Oxygen Erosion Control than brush.

So EPA & CEQA are reducing the production of Oxygen and increasing the production of Carbon Dioxide.

Forest Fires like the Angora Fire at Lake Tahoe could have easily be prevented but the individuals responsible are obviously incompetent as were the personnel sent to fight it.

Regards,

Former USFS District Ranger

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-12 12:39:55

No Duplicates.



## **Comment 31 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Richard  
Last Name: Wheeler  
Email Address: rwheeler@surewest.net  
Affiliation:

Subject: Destructive Forest Management  
Comment:

Gentlemen,

Please be advised, my physical address is:

Richard A. Wheeler  
3927 Adelheid Way  
Sacramento, CA 95821-2828

Yes, I would like a hard copy of the regulatory items that my comment mentioned.

And that is: Why do the EPA and CEQA Laws pertain to Timber Land Management, since it is an Agricultural Practice?

No other Agricultural Practices require an approved Environmental Impact Review/Report before Harvesting or Planting Activities can be conducted.

Why the difference? Timber Harvesting PRACTICES are already under the jurisdiction of the California Forest PRACTICES ACT. Why the duplication?

Why is the U.S. Forest Service and the U.S. National Forests under the jurisdiction of the U.S. Department of Agriculture if their Administration and Management is not Agriculture and recognized as Agricultural Practices?

I would also suggest an investigation of the CDF's Archeological Program and see if the Archeological Reports as submitted to the Archeological Information Centers meet the standards of Significance.

Is this possible?

This program is not being implemented correctly as required by the EPA or CEQA. Many if not most of the Historical and Archeological Sites do not meet the requirements of Significance.

During my employment as a Registered Professional Forester, I was

required to  
register sites that had been almost entirely destroyed. And the  
Law  
states that  
damaged sites do not and should not be registered or reported.

Why is this additional expense required of Forest Land and its  
Agricultural  
Practices?

I would appreciate your answer to my questions.

Regards,

Richard

On Dec 12, 2008, at 12:39 PM, owner-ceqa-general-  
ws@listserv.arb.ca.gov wrote:

Thank you for taking the time to send the  
Air Resources Board (ARB or Board) your  
views concerning an issue under consideration  
by the ARB.

If your comment concerned a regulatory item, you  
will receive notice of additional public comment  
periods, if any, on that item. However, this  
notice will be exclusively via email unless you  
provide ARB with a physical address to which you  
would like a hard copy of the notice to be mailed.

Thanks again for your input.

Sincerely,

/s/  
Ombudsman  
California Air Resources Board

----- Your comment follows -----

Comment 31 for ceqa-general-ws (2nd Workshop).

CONTACT INFORMATION:

First Name: Richard  
Last Name: Wheeler  
Email: rwheeler@surewest.net  
Phone:  
Affiliation:  
File (i.e., Attachment):

Subject: Destructive Forest Management

Comment:

Forest Land occupies about 40% of California and it is being  
mismanaged or not being managed at all.

I was a Professional Forester for 58 years. Forest Management and  
Forest Product Production i.e. Timber Harvesting is an  
Agricultural  
Practice not a project that is changing the character or use of  
the  
land.

I recently questioned the CDF about Overcutting of Forest Land  
and

they had no records of any overcutting. The California Forest Practice Act requires reforestation of Clear Cuts, so that is not overcutting.

I also questioned the amount of Erosion as Overcutting and Erosion are the two most important socalled Impacts on Forest Land. They answered that all of their studies showed there was NO SIGNIFICANT EROSION due to Timber Harvesting.

An Investigation of the Archeological Centers Reports and Inventory would reveal that few if any of the Sites that have been recorded meet the description of Historical or Archeological Sites as defined in EPA or CEQA. They have been recorded because otherwise your Timber Harvesting Plan would not be recorded. Damaged sites do not qualify as Historical or Archeological Sites. Mining ditches made into roads are no longer historical sites.

There is no real evidence that Timber Harvesting affects any Wildlife as only about 1% of Forest Land is harvested per year, meaning 99% is left undisturbed for wildlife and Oxygen Production.

On the other hand, Carbon Dioxide has been increased by the lack of effective and efficient Forest Fire Fighting. Air Tankers and Fire Truck just don't cut it!

And the number of Dead & Dying Trees create more Carbon Dioxide as they cannot not be gathered or salvaged due to the expense of the Harvesting Permit.

Such a permit in California costs 3X as much as one in Oregon, that's why Oregon is shipping in most of the lumber. This situation has reduced the Forest Product Economy by 78% costing Billion of Dollars of Income to California along with thousands, maybe hundreds of thousands of jobs.

Deforestation is increasing as Judges determine that Burned Areas can not be planted to Forest Seedlings and produce more Oxygen, Erosion Control than brush.

So EPA & CEQA are reducing the production of Oxygen and increasing the production of Carbon Dioxide.

Forest Fires like the Angora Fire at Lake Tahoe could have easily be prevented but the individuals responsible are obviously incompetent as were the personnel sent to fight it.

Regards,

Former USFS District Ranger

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-13 17:17:03

No Duplicates.

**Comment 32 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Dan  
Last Name: Marks  
Email Address: dmarks@ci.berkeley.ca.us  
Affiliation: City of Berkeley Planning & Development

Subject: Interim CEQA Greenhouse Gases Significance Thresholds  
Comment:

Attached is December 17, 2008 letter from Dan Marks, Director of Planning and Development, City of Berkeley, to Douglas Ito, ARB, 1001 I Streeet, Sacramento, CA 95814, re Preliminary Draft Staff Proposal: Interim CEQA Greenhouse Gases Signicance Thresholds.

Please let me know that our response is received.

Mary Shea (mshea@ci.berkeley.ca.us)  
for Dan Marks  
(510) 981-7404

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/33-arb\\_ceqa\\_12-17-08.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/33-arb_ceqa_12-17-08.pdf)

Original File Name: ARB CEQA 12-17-08.pdf

Date and Time Comment Was Submitted: 2008-12-18 10:26:54

No Duplicates.

**Comment 33 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Larry  
Last Name: Rohlfes, CAE  
Email Address: larryrohlfes@clca.org  
Affiliation: Calif. Landscape Contractors Association

Subject: Interim Significance Thresholds for GHGs under CEQA  
Comment:

December 19, 2008

Kurt Karperos, Chief  
Air Quality and Transportation Planning Branch  
Planning and Technical Support Division  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

Douglas Ito, Manager  
SIP and Local Government Strategies Section  
Planning and Technical Support Division  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

Re: Comments on Recommended Approaches for Setting Interim  
Significance Thresholds for Greenhouse Gases under the California  
Environmental Quality Act

Dear Mr. Karperos and Mr. Ito:

The California Landscape Contractors Association, representing more than 3,000 licensed contractors and associated industry suppliers who design, construct, and maintain commercial, public, and residential landscapes, welcomes the opportunity to comment on the Air Resources Board draft staff proposal for setting interim significant thresholds under the California Environmental Quality Act. Our comments are limited to those elements of the staff recommendations relating to setting potential performance standards for landscape irrigation.

CLCA supports the goal of providing lead agencies and developers with a performance-based pathway for determining thresholds of significance associated with greenhouse gas emissions from projects subject to CEQA. We recognize that efficient use of water for landscape irrigation is an essential component of any performance-based standards ultimately adopted by the board. However, it is critically important to our membership that any landscape irrigation standards adopted by the board be consistent and conform to the updated Model Water Efficient Landscape Ordinance ("Model Ordinance") regulations that will shortly be adopted by the California Department of Water Resources.

Based on our review of staff materials and workshop presentations, it appears that the ARB staff is attempting to "piggyback" an arbitrary 50 percent reduction in water use for landscape irrigation on top of the already stringent water efficiency

standards being established by the updated Model Ordinance. In Slide 17 of the December 9th workshop presentation, staff misreads the requirements of Section 604.2 of the California Green Building Code, which does not require a 50 percent reduction in water use above the requirements of the water budget as calculated under the Model Ordinance. In fact, Section 604.2 merely provides that water use shall be reduced by 50 percent "after initial requirements for plant installation and establishment." In this connection, the most recent draft of the updated Model Ordinance regulations does not differentiate between the water allowed for newly installed versus established plants, but instead provides for an annual water budget which gives property owners flexibility to apply more or less water at different times of the year or during initial growth, while keeping total annual water use within an aggregate cap. Moreover, the Outdoor Water Use provisions of the California Green Building Code (Section 604 et seq.) were never designed to apply to dwellings, are currently voluntary, and appear to be borrowed from also voluntary LEED standards that are more appropriate to Midwestern and Eastern states where climatologic conditions differ significantly from those found in California.

The Model Ordinance offers an ideal performance standard because it in-corporates many specific geographic and climate adjusted design, documentation, and compliance criteria and, most importantly, enforcement provisions before and after project completion to assure that projected water savings from an approved landscape design are actually realized. Additionally, in situations where landscaping is installed after project approval, such as a single-family housing development with unfinished backyards, the Model Ordinance will apply prospectively to the individual homeowners if the landscaped area is 5,000 square feet or more and the landscape work requires a building or landscape permit.

As experienced landscape professionals, we believe that a 50 percent reduction in landscape water use above and beyond the reductions already contemplated by the updated Model Ordinance would drastically change the characteristics of California landscapes and have unintended consequences that would contribute to even greater energy-related greenhouse gas emissions, such as increased air conditioning use due to reduction of shade from trees and large shrubs, the accentuation of heat island effects, and reduced carbon sequestration by lawns and landscape plants. Healthy landscapes also help clean the air and reduce dust and particulate matter--important public health and quality of life issues for many communities.

For these reasons CLCA recommends the Model Ordinance as the most appropriate, effective, and evidence-based performance standard for water efficient landscaping in commercial and residential projects subject to CEQA. Any reference to the Green Building Standards Code, which was erroneously drafted and never intended to apply to dwellings, should be avoided.

If additional outdoor potable water savings beyond those achievable from the Model Ordinance are necessary, CLCA recommends that the board consider cost-effective performance measures to supply recycled or reclaimed water to projects--so long as the aggregate amount of water available for landscaping use from both potable and non-potable sources is not less than the annual water budget established for a particular property by the Model Ordinance.

CLCA appreciates the challenges presented to board staff in crafting performance standards for residential and commercial projects that reasonably limit greenhouse gas emissions from at least five sources. As this proposal evolves we hope that you will reach out to CLCA for its advice and counsel on real world solutions to landscape water conservation.

Sincerely yours,

LARRY ROHLFES, CAE  
Assistant Executive Director

cc: Rick Soehren, Chief, DWR Office of Water Use Efficiency and  
Transfers,

CLCA Executive Director Sharon McGuire  
CLCA Board of Directors  
CLCA Legislation Committee  
CLCA Resource Management Committee  
Parke Terry, Greenberg Traurig LLP

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/34-doc20081218144129.pdf>

Original File Name: doc20081218144129.pdf

Date and Time Comment Was Submitted: 2008-12-19 15:02:38

No Duplicates.



**Comment 34 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Matt

Last Name: Vespa

Email Address: mvespa@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: CBD Comments on Revised Preliminary Draft

Comment:

Comments attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/35-cbd\\_\\_comments\\_arb\\_proposed\\_threshold\\_dec\\_23\\_2008.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/35-cbd__comments_arb_proposed_threshold_dec_23_2008.pdf)

Original File Name: CBD Comments ARB Proposed Threshold Dec 23 2008.pdf

Date and Time Comment Was Submitted: 2008-12-23 14:33:21

No Duplicates.

**Comment 35 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Jessica  
Last Name: Hankins  
Email Address: [jessica.hankins@co.nevada.ca.us](mailto:jessica.hankins@co.nevada.ca.us)  
Affiliation: Nevada County Planning Dept

Subject: General comments on proposed GHG thresholds  
Comment:

General comments on the proposed interim thresholds are attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/36-to-arb\\_thresholds\\_122608.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/36-to-arb_thresholds_122608.pdf)

Original File Name: To-ARB\_Thresholds\_122608.pdf

Date and Time Comment Was Submitted: 2008-12-29 09:15:34

No Duplicates.

**Comment 36 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Shari  
Last Name: Libicki  
Email Address: slibicki@environcorp.com  
Affiliation: ENVIRON

Subject: GDC Comments on the CEQA Threshold Guidelines Process: Backup Documentation Must be Released  
Comment:

Comment letter attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/37-gdc\\_comments\\_20081230.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/37-gdc_comments_20081230.pdf)

Original File Name: GDC Comments 20081230.pdf

Date and Time Comment Was Submitted: 2008-12-30 16:10:48

No Duplicates.

**Comment 37 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: James  
Last Name: Andrew  
Email Address: jandrew@ellman-burke.com  
Affiliation: Ellman Burke Hoffman & Johnson

Subject: Comment on Boxes 2 and 3 of Attachment B  
Comment:

Thank you for the opportunity to comment. Development of significance thresholds is not an easy task. Thank you for your efforts.

I have several concerns regarding the draft thresholds, most of which concerns are captured in the letters from the APA California and CBIA. I will not repeat those concerns here. I do add the following comments, and specific proposal to modify Box 3 of Attachment B.

I do not believe that Box 2 will be useful for projects in most jurisdictions. It is simply too layered with programmatic requirements, and will be too hard for local agencies to apply. CEQA is filled with exceptions and streamlining provisions that assume that cities and counties have the time and money to undertake the higher level programmatic planning work. This simply does not happen in most cases. In any event, the SB 375 process will be a type of programmatic approach by itself (which is why Box 3 needs to reference SB 375). From a land-location perspective as it may impact global warming (including from transportation), consistency with an approved SCS/APS should be enough by itself, regardless of project size. If a project also meets the performance standards for water use, energy use, etc. - which are not covered by SB 375 - then the project should be less than significant.

The idea that a "large" project must be treated as potentially significant simply because it is large (as Box 3 states) cannot be supported. AB 32 sets up an overall cap, and the Scoping Plan clearly defers to the SB 375 process to get there. Imagine that we could predict and precisely plan where all growth in California will occur and could require that it all occur there and that it be constructed to meet water/energy performance standards, AND we planned it to meet the Scoping Plan's 5 MMT target. The CEQA review for that planning exercise would have to conclude that the impact of such development on global warming is less than significant. Accordingly, why should any project that is consistent with SB 375 (which is what we've set up to get us to the same place) ever be treated as significant from a global warming perspective (again, assuming it meets water/energy requirements)?

Consistent with the foregoing, I would suggest that Box 3 for Residential and Commercial projects be revised to reference the SB 375 SCS and APS. SB 375 specifically includes a provision (see Sec. 15 of SB 375, to be codified at PRC 21159.28) that says that a CEQA document for a project consistent with an approved SCS or APS does not have to discuss GHG emissions from cars and light-duty trucks. This would hold true regardless of the size of the project or its emissions.

With this, Box 3 would be as follows:

"3.(a)...

Construction...

Operations...

• ...

• ...

• ... standard for waste

AND

(b) (i) Meets an interim ARB performance standard for transportation OR (ii) is not required to reference, describe, or discuss impacts from cars and light-duty trucks generated by the project on global warming under Public Resources Code 21159.28

AND

(c) if (b)(ii) does not apply, the project with performance standards...will emit no more than X....."

Thank you,  
Jim Andrew

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-01-02 14:36:09

No Duplicates.

**Comment 38 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Barbara

Last Name: Spoonhour

Email Address: spoonhour@wrcog.cog.ca.us

Affiliation: Western Riverside Council of Governments

Subject: Comments on the Preliminary Draft Proposal for Interim Significance Thresholds for GHG  
Comment:

The Western Riverside Council of Governments staff would like to submit the following comments on ARBs Preliminary Draft Proposal for Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/39-ceaq\\_threshold\\_comment\\_letter\\_to\\_carb.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/39-ceaq_threshold_comment_letter_to_carb.pdf)

Original File Name: CEAQ Threshold Comment Letter to CARB.pdf

Date and Time Comment Was Submitted: 2009-01-05 10:15:39

No Duplicates.

**Comment 39 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Patrick  
Last Name: Griffith  
Email Address: pgriffith@lacsds.org  
Affiliation: LACSD

Subject: Comments on the ARB CEQA Greenhouse Gas Proposal  
Comment:

PDF Comment Letter on the ARB CEQA Greenhouse Gas Proposal

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/40-comment\\_letter\\_on\\_the\\_arb\\_ceqa\\_ghg\\_proposal.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/40-comment_letter_on_the_arb_ceqa_ghg_proposal.pdf)

Original File Name: Comment Letter on the ARB CEQA GHG Proposal.pdf

Date and Time Comment Was Submitted: 2009-01-09 09:41:43

No Duplicates.

**Comment 40 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Barbara

Last Name: Spoonhour

Email Address: spoonhour@wrcog.cog.ca.us

Affiliation: Western Riverside Council of Governments

Subject: ARB Approach to GHG Significance Thresholds under CEQA

Comment:

On behalf of the City of Corona, I would like to submit the attached comments on ARB's Approach to GHG Significance Thresholds under CEQA.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/41-city\\_of\\_corona\\_arb\\_comment\\_ltr.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/41-city_of_corona_arb_comment_ltr.pdf)

Original File Name: City of Corona ARB Comment Ltr.pdf

Date and Time Comment Was Submitted: 2009-01-09 13:28:19

No Duplicates.



**Comment 41 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: lori

Last Name: Ballance

Email Address: lballance@gdandb.com

Affiliation:

Subject: Comments on the Proposed CEQA Significance Thresholds for GHGs

Comment:

Please see attached letter.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/42-comment\\_letter\\_on\\_proposed\\_significance\\_thresholds\\_\\_01-09-09\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/42-comment_letter_on_proposed_significance_thresholds__01-09-09_.pdf)

Original File Name: Comment letter on Proposed Significance Thresholds (01-09-09).pdf

Date and Time Comment Was Submitted: 2009-01-09 14:37:01

No Duplicates.

**Comment 42 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Anne  
Last Name: McQueen  
Email Address: anne.mcqueen@amec.com  
Affiliation: AMEC Geomatrix

Subject: Comments on ARB CEQA GHG Guidance  
Comment:

Please see the attached file

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/43-comment\\_on\\_arb\\_ceqa\\_guidance\\_jan\\_09\\_09.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/43-comment_on_arb_ceqa_guidance_jan_09_09.pdf)

Original File Name: comment on ARB CEQA guidance Jan 09 09.pdf

Date and Time Comment Was Submitted: 2009-01-09 15:14:10

No Duplicates.

**Comment 43 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Steven  
Last Name: Kelly  
Email Address: steven@iepa.com  
Affiliation: IEP

Subject: GHG Thresholds of Significance under CEQA  
Comment:

Attached are the comments from the Independent Energy Producers Association on GHG Thresholds of Significance under CEQA.  
Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/44-iep\\_comments\\_to\\_carb\\_on\\_thresholds\\_of\\_significance\\_under\\_ceqa\\_\\_final\\_1-9-09\\_\\_\\_\\_.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/44-iep_comments_to_carb_on_thresholds_of_significance_under_ceqa__final_1-9-09____.doc)

Original File Name: IEP Comments to CARB on Thresholds of Significance Under CEQA (FINAL 1-9-09) .doc

Date and Time Comment Was Submitted: 2009-01-09 15:19:30

No Duplicates.

**Comment 44 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Gretchen

Last Name: Hardison

Email Address: gretchen.hardison@lacity.org

Affiliation: City of Los Angeles

Subject: Comments on proposed performance standards

Comment:

Please see this second set of attached comments from City of Los Angeles staff on the approach to statewide CEQA thresholds for GHG emissions. For further information, please contact me at the e-mail or phone listed above.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/45-arb\\_ceqa\\_ghg\\_thresholds\\_1-09-09\\_cmt\\_ltr.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/45-arb_ceqa_ghg_thresholds_1-09-09_cmt_ltr.pdf)

Original File Name: ARB CEQA GHG thresholds 1-09-09 cmt ltr.pdf

Date and Time Comment Was Submitted: 2009-01-09 15:37:22

No Duplicates.

**Comment 45 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Timothy  
Last Name: Cremin  
Email Address: tcremin@meyersnave.com  
Affiliation: Meyers Nave

Subject: Comments of Meyers Nave on ARB CEQA Threshold Proposal  
Comment:

Attached are General Comments of Tim Cremin, Principal, Meyers Nave, on ARB Preliminary Draft Staff Proposal for Determining Significance of Greenhouse Gas Emissions under CEQA

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/46-meyers\\_nave\\_comments\\_on\\_arb\\_draft\\_ceqa\\_thresholds.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/46-meyers_nave_comments_on_arb_draft_ceqa_thresholds.doc)

Original File Name: Meyers Nave Comments on ARB Draft CEQA Thresholds.doc

Date and Time Comment Was Submitted: 2009-01-09 16:03:59

No Duplicates.

**Comment 46 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Barbara  
Last Name: Baird  
Email Address: bbaird@aqmd.gov  
Affiliation: South Coast AQMD

Subject: Comments re GHG Significance Thresholds under CEQA  
Comment:

Attached are the comments of South Coast AQMD re CEQA and Greenhouse Gases.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/47-comments\\_ghg\\_ceqa\\_1-9-09.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/47-comments_ghg_ceqa_1-9-09.pdf)

Original File Name: Comments GHG CEQA 1-9-09.pdf

Date and Time Comment Was Submitted: 2009-01-09 16:45:27

No Duplicates.

**Comment 47 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: The  
Last Name: Pacific Forest Trust  
Email Address: rkatz@pacificforest.org  
Affiliation:

Subject: Comments on Interim Thresholds  
Comment:

Please see attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/48-arb\\_threshold\\_comments\\_pft\\_1\\_9\\_09\\_final.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/48-arb_threshold_comments_pft_1_9_09_final.doc)

Original File Name: ARB Threshold Comments\_PFT\_1 9 09 final.doc

Date and Time Comment Was Submitted: 2009-01-09 16:59:05

No Duplicates.

**Comment 48 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Rhys  
Last Name: Rowland  
Email Address: rrowland@cityofdavis.org  
Affiliation: City of Davis

Subject: General Questions/Comments Regarding the Approach  
Comment:

- o It is good to have a threshold to compare a project to?
- o How will we know if a study provides a valid number?
- o What resources can we rely upon to validate numbers related to projects?
- o How do we evaluate projects that do not fall into these three use categories? Does a "commercial" project include projects which are public/semi-public, office, churches, schools, or other? We think more guidance will be necessary since substantial categories of projects would not be evaluated under the proposed thresholds.
- o Do we merely condition a project to be in compliance with the standards and have the applicant provide proof?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-01-14 16:40:45

No Duplicates.



**Comment 49 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Shelly  
Last Name: Sullivan  
Email Address: ssullivan@onemain.com  
Affiliation: AB 32 Implementation Group

Subject: AB 32 Implementation Group -- Comments on CEQA Interim Significance Thresholds  
Comment:

Attached please find comments from the AB 32 Implementation Group on 'Preliminary Draft Staff Proposal on Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under CEQA (October 24, 2008).'

Please feel free to contact me if you have any questions if you need anything further.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/50-ab32\\_ig\\_ceqa\\_ltr\\_to\\_carb\\_fina\\_0](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/50-ab32_ig_ceqa_ltr_to_carb_fina_0)

Original File Name: AB32 IG CEQA Ltr to CARB FINA#0

Date and Time Comment Was Submitted: 2009-01-16 12:51:54

No Duplicates.

**Comment 50 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Shari  
Last Name: Libicki  
Email Address: slibicki@environcorp.com  
Affiliation: ENVIRON International Corporation

Subject: GDC Comments on the CEQA Threshold Guidelines  
Comment:

See attached letter.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/51-gdc\\_comments\\_final\\_20090116.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/51-gdc_comments_final_20090116.pdf)

Original File Name: GDC Comments Final 20090116.pdf

Date and Time Comment Was Submitted: 2009-01-16 13:58:37

No Duplicates.

**Comment 51 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Jessica

Last Name: Range

Email Address: jessica.range@sfgov.org

Affiliation: City and County of San Francisco

Subject: Comments on Proposed CEQA Thresholds

Comment:

Please see the attached comment letter from the City and County of San Francisco.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/52-carb\\_ceqa\\_comment\\_letter\\_ccsf.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/52-carb_ceqa_comment_letter_ccsf.pdf)

Original File Name: CARB\_CEQA Comment Letter\_CCSF.pdf

Date and Time Comment Was Submitted: 2009-01-16 16:26:52

No Duplicates.

**Comment 52 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Mark  
Last Name: Dillon  
Email Address: mdillon@gdandb.com  
Affiliation:

Subject: Comment Letter regarding Proposed Significance Criteria  
Comment:

Please see attached letter.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/53-lt\\_carb\\_re\\_ghg\\_ceqa\\_thresholds\\_\\_1-16-09\\_.doc.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/53-lt_carb_re_ghg_ceqa_thresholds__1-16-09_.doc.pdf)

Original File Name: LT CARB re GHG CEQA Thresholds (1-16-09).doc.pdf

Date and Time Comment Was Submitted: 2009-01-16 16:57:50

No Duplicates.

**Comment 53 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: J.P.

Last Name: Cativiela

Email Address: dairycare@aol.com

Affiliation:

Subject: CEQA significance thresholds

Comment:

Please see attached comment letter.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/54-cares\\_comment\\_letter\\_1\\_16\\_09.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/54-cares_comment_letter_1_16_09.pdf)

Original File Name: CARES comment letter 1 16 09.pdf

Date and Time Comment Was Submitted: 2009-01-16 18:12:11

No Duplicates.

**Comment 54 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: J.P.

Last Name: Cativiela

Email Address: dairycares@aol.com

Affiliation: CARES

Subject: Comments

Comment:

We submitted our comments on Friday, Jan. 16 and subsequently noted a couple of errors. The attached revises the table on page 5 to correct the 2006 cow population and milk production figures. Also we've revised the first paragraph on page 6 for clarity.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/55-cares\\_comment.corrected.1.19.08.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/55-cares_comment.corrected.1.19.08.pdf)

Original File Name: CARES Comment.CORRECTED.1.19.08.pdf

Date and Time Comment Was Submitted: 2009-01-19 12:04:49

No Duplicates.

**Comment 55 for General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) - 2nd Workshop.**

First Name: Sande  
Last Name: George  
Email Address: sgeorge@stefangeorge.com  
Affiliation: APA California

Subject: Comments on the overall approach to GHG significance thresholds under the CEQA  
Comment:

Last week I requested that the attached document replace a previous submission as there were red comments showing in the document. The correct document is now posted but the name in the Received From column of the workshop log (see #55) is incorrect. Currently it reads "Farrell, Francine" but should read "APA California, Sande George". I was instructed by Zenia Aguilera in the Office of the Ombudsman to resubmit the document with the affiliation box filled in. Please update the Received From box with this information.

Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/59-10-apaca\\_final\\_ab\\_32\\_ceqa\\_thresholds\\_of\\_significance\\_proposal\\_apac\\_comments\\_11\\_21\\_08\\_ah\\_\\_\\_pp.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-general-ws/59-10-apaca_final_ab_32_ceqa_thresholds_of_significance_proposal_apac_comments_11_21_08_ah___pp.doc)

Original File Name: 10-apaca\_final\_ab\_32\_ceqa\_thresholds\_of\_significance\_proposal\_apac\_comments\_11\_21\_08\_ah\_\_\_pp.doc

Date and Time Comment Was Submitted: 2009-02-17 13:17:54

No Duplicates.

**There are no comments posted to General comments on ARB staff's overall approach on interim GHG significance thresholds under the CEQA. (ceqa-general-ws) that were presented during the Workshop at this time.**