

**Comment 1 for Comments on industrial project approach for CEQA (ceqa-ind-ws) - 1st Workshop.**

First Name: Nora

Last Name: Monette

Email Address: nmonette@davidjpowers.com

Affiliation: David J. Powers & Associates

Subject: Comments on Attachment A

Comment:

Industrial Projects:

1. Please include definitions of what is considered an industrial project. For example, a manufacturing facility would clearly be an industrial project. Large data centers would likely use similar mechanical equipment. What about a warehouse, R&D/office, a Materials Recovery Facility (MRF), or light industrial (i.e., automotive repair) facility? Where do landfills, water treatment plants, and wastewater treatment facilities fit in?

2. From a regional standpoint, could performance standards be developed for needed public services (landfills, MRFs, etc.) than would result in less than significant impacts, if met? What about for shared public facilities? Or alternatively, what would be considered feasible GHG mitigation for these types of facilities?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-28 15:49:48

No Duplicates.

## **Comment 2 for Comments on industrial project approach for CEQA (ceqa-ind-ws) - 1st Workshop.**

First Name: ANTHONY

Last Name: POCENGAL

Email Address: POCENGAL\_ANTHONY@SOLARTURBINES.COM

Affiliation:

Subject: INDUSTRIAL

Comment:

Comments on Industrial sector:

If a new stationary source is above the 'significance threshold' of 7000 mt CO2e/yr according to CEQA it will need 'mitigation.'

Since no practical 'mitigation' for CO2 emissions exist besides efficiency measures, what is the practical value of setting such 'significance levels' since efficiency is it's own incentive? And since no single stationary source, no matter how large, will affect neither global nor california climate, how is this proposed exercise justified on a scientific or practical basis? How would citizens of CA benefit from such a proposal?

Since 25,000 mt is being used for AB32 inclusion, why is the CEQA number 7000 mt? If such a 'significance' measure is to be considered, 7000 is too low. Minimum should be in line with AB32 and 25,000 mt.

Concern is that this proposal adds another level of unnecessary bureaucracy towards proposed projects with no returned value in environmental protection. Potential to impede a project based on this proposal seems disproportionately large compared to the zero environmental value it represents.

The only real effect of this proposal seems to be that it sets up the potential for holding up worthwhile projects in order to determine mitigation options that dont exist, while offering zero environmental benefit in return. The last thing we need in california is another level of such academic exercises in bureaucracy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-03 12:34:44

No Duplicates.

**Comment 3 for Comments on industrial project approach for CEQA (ceqa-ind-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-ind-ws/4-nrdc\\_comments\\_to\\_carb\\_on\\_ceqa\\_thresholds\\_-\\_industrial.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-ind-ws/4-nrdc_comments_to_carb_on_ceqa_thresholds_-_industrial.pdf)

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

Date and Time Comment Was Submitted: 2008-11-26 10:34:04

No Duplicates.

**Comment 4 for Comments on industrial project approach for CEQA (ceqa-ind-ws) - 1st Workshop.**

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

**Comment 5 for Comments on industrial project approach for CEQA (ceqa-ind-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 attached City of Los Angeles staff comments regarding industrial facilities (utilities) and GHG thresholds.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-ind-ws/6-arb\\_ceqa\\_ghg\\_thresholds\\_11-26-08\\_cmt\\_ltr.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-ind-ws/6-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 13:15:31

No Duplicates.

**Comment 6 for Comments on industrial project approach for CEQA (ceqa-ind-ws) - 1st Workshop.**

First Name: David

Last Name: Morrow

Email Address: dmorrow@swca.com

Affiliation: Air Quality Specialist SWCA

Subject: errata

Comment:

ARB staff,

There appears to be an error in the math on page 10 of the preliminary draft CEQA thresholds proposal. Specifically, the document states that 63% of GHGs comes from fuel combustion. Therefore  $100\% - 63\% = 37\%$ . The document erroneously makes this number to be 27% in the text.

I realize that this error is a small one, but in the context of regulations, the numbers are often key. Additionally, these type of guidance documents tend to be cited by other parties, and errors can propagate in unexpected ways.

I recommend staff review the arithmetic and correct as needed.

Respectfully,

Dave Morrow

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 11:40:11

No Duplicates.

**Comment 7 for Comments on industrial project approach for CEQA (ceqa-ind-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-ind-ws/8-comments\\_ghg\\_ceqa\\_1-9-09.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-ind-ws/8-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 16:47:44

No Duplicates.

## **Comment 8 for Comments on industrial project approach for CEQA (ceqa-ind-ws) - 2nd Workshop.**

First Name: Rhys

Last Name: Rowland

Email Address: rrowland@cityofdavis.org

Affiliation: City of Davis

Subject: Industrial Standards

Comment:

Our comments are specifically on the following proposed standards.

- If categorically exempt project, then exempt from further analysis.

Comment: We believe there are circumstances where categorically exempt projects may emit a considerable amount of green house gas emissions relative to the overall emissions for small community. We suggest reviewing this and setting a number that could be universally accepted as less than significant.

- If not categorically exempt, then the analysis must show that a project:

- o Meets the CARB standards for construction and transportation; and

- o Emit not more than 7,000 MT of CO2 or equivalent per year

Comment: 7,000 MT is equivalent to approximately a 425 unit subdivision considering the average current emissions for the State at 16.47 MT per unit per year. We suggest that this number for a smaller community may represent a substantial percentage of the overall emissions. We believe this number to be high. We believe projects should be limited to their "fair share" of emissions. If our city felt the standard was too high could we set a lower number to hold projects to? This would be consistent with other jurisdictions setting their own thresholds of significance. We believe this is consistent with State Law as long as the standard is not less than the State's adopted guideline.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-01-14 16:34:51

No Duplicates.



**Comment 9 for Comments on industrial project approach for CEQA (ceqa-ind-ws) - 2nd Workshop.**

First Name: Brian

Last Name: Biering

Email Address: bsb@eslawfirm.com

Affiliation: Ellison, Schneider & Harris

Subject: Comments On Proposed Significance Threshold For Industrial Sector

Comment:

Please see attached comments submitted by Brian Biering of Ellison, Schneider and Harris.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-ind-ws/10-biering\\_letter\\_to\\_carb\\_re\\_ceqa\\_sig\\_thresholds.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-ind-ws/10-biering_letter_to_carb_re_ceqa_sig_thresholds.pdf)

Original File Name: Biering Letter to CARB Re CEQA SIg Thresholds.pdf

Date and Time Comment Was Submitted: 2009-01-16 16:56:16

No Duplicates.

**There are no comments posted to Comments on industrial project approach for CEQA (ceqa-ind-ws) that were presented during the Workshop at this time.**