

## **Comment 1 for Comments on staff's approach on residential and commercial projects under the CEQA (ceqa-rescom-ws) - 1st Workshop.**

First Name: Nora

Last Name: Monette

Email Address: nmonette@davidjpowers.com

Affiliation: David J. Powers & Associates

Subject: Attachment B - Residential and Commercial Projects

Comment:

Box 2

1. What about projects that ultimately may be covered by multiple Plans, such as a Regional Plan (MTC), a Climate Action Plan and a General Plan? Would "inconsistency" with one of the plans trigger going to Box 3?

2. Please define "community level GHG target". Does the target need to use 1990 emissions as a baseline? What if the community uses a later date, say 2002, for their baseline because they have better data? Would that invalidate the Plan for tiering purposes?

Box 3

1. Will it be up to the Lead Agency to come up with a methodology to determine what mitigation is equivalent to performance standards (i.e., Tier II) or will there be some type of crosswalk to help Lead Agencies determine equivalence?

2. Statement (b) implies that all projects, no matter how large, would be required to meet the same cap.

3. For Statement (b), what about using performance standards (emissions/dwelling unit or emissions/square foot) rather than a cap?

Box 4

1. Lead Agencies will need expertise and a mechanism for review of mitigation measures for those projects that trigger preparation of an EIR based upon GHG emissions. Will ARB, Air Management Districts, or another appropriate entity assist Lead Agencies with lists of feasible mitigation measures/performance levels that should be considered as mitigation measures? Alternatively, could a review process (similar to an Architectural Review Board, but possibly on a regional or County basis) be outlined that could assist Lead Agencies with identifying and evaluating mitigation measures?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-28 15:54:00

No Duplicates.

## **Comment 2 for Comments on staff's approach on residential and commercial projects under the CEQA (ceqa-rescom-ws) - 1st Workshop.**

First Name: Bob

Last Name: Johnston

Email Address: rajohnston@ucdavis.edu

Affiliation: UC Davis

Subject: Residential and Commercial Projects: Transportation GHGs Performance Standard  
Comment:

Doug,

Re. The need for a performance standard for residential and commercial projects with respect to transportation GHG emissions

1. On p. 15, par. 3, under Residential and Commercial Projects, the ARB staff requests "input... on appropriate performance standards for these sub-sources..." Transportation is one of the sub-sources. "Performance standards that already exist...are preferable." On pp. 14-15 the rept. says that the performance standards are for carbon efficiency and will have to "reach beyond current State mandates by a substantial amount..." By viewing Attachment B, one can see that, until local climate plans or sustainable communities plans are adopted and approved by the ARB as attaining the SB 375 targets, or if not an MPO county, attaining the SB 32 budgets, Performance Standards, will be the relevant ones. So, for the next several years, performance standards will be paramount to getting early GHG reductions, which is the purpose of this whole document and proposed rule.

2. I can suggest an existing performance standard for part a. in Box 3, for transportation. The U.S. FTA New Rail Starts evaluation procedure for funding passenger rail proposals has a category for Transit Supportive Land Use. This category is important in that it gets half the weight in the evaluation procedure. This system has been used successfully for several years. It is clear from empirical evidence and from modeling exercises that we must get mode shifts from cars to walk, bike, and transit, in order to substantially reduce GHG emissions from personal travel. What works for transit also works for walk and bike. The recent Rodier paper done for your staff reviews the modeling literature and the recent Ewing book and review for NRDC sent to your staff review the empirical literature. In addition, the Frank review of URBEMIS for EDF?, also critiques and summarizes the empirical studies. Density is critical, along with good transit service (rail or BRT), sidewalks, land use mix, and centrality within the urban region.

The most important FTA papers are: FY 2009 New Starts and Small Starts Evaluation and Rating Process, for an overview, and Reporting Instructions for the Section 5309 New Starts Criteria, for some details. You should be able to google these. If you have problems, let me know. I am aware of these Federal rules and agency procedures, because I published a critique of the previous FTA evaluation method about 20 years ago. Also, I did a

historical paper on the downzonings around many BART stations, after it opened, and lobbied BART about 20 years ago to require density before opening a station. This was a widespread argument across the U.S. and filtered up to FTA.

You could, alternatively, require set levels of population density, land use mix, walkability/bikeability, and other urban design values, relying on the "4 Ds" and "5 Ds" studies. Caltrans did a report on them, Assessment of Local Models and Tools for Analyzing Smart-Growth Strategies, July 27, 2007. It can be googled from the Caltrans website. These methods have been used by California local govts successfully. Jerry Walters, from Fehr and Peers, who spoke at the Haagen-Smit Symposium, is the expert on this method.

2. For part b. in Box 3, I suggest your URBEMIS model, or any other similar site-level analysis tool. Evaluating the VMT dependent on a single project is inherently uncertain, though. That's why the "AND" is so important between a. and b., requiring the project to meet both sets of criteria.

3. In my many modeling studies of the Sacramento region, with several travel models and urban models, I found that charging for worktrip parking was usually the most-effective policy. Density and transit is good, but charging for parking at workplaces is also needed to get substantial mode shifts to walk, bike, and transit. So, parking with hourly and daily charges should be a criterion in both part a. and part b. It is not mentioned in the FTA ratings system and is underappreciated in URBEMIS and the 4 Ds systems.

I hope these ideas are helpful. I do appreciate the great efforts of you and your staff to meet the AB 32 scoping deadlines and the CEQA guidelines calendar, also.

Bob

Robert A. Johnston, Emeritus Professor

Dept. of Environmental Science & Policy  
University of California, Davis  
Home/Office Phone: 530 582-0700  
15299 Wolfgang Rd., Truckee, CA 96161  
Mobile Phone: 530 559-0032  
<http://www.des.ucdavis.edu/faculty/johnston/index.htm>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-30 21:27:50

No Duplicates.

**Comment 3 for Comments on staff's approach on residential and commercial projects under the CEQA (ceqa-rescom-ws) - 1st Workshop.**

First Name: Arthur

Last Name: Unger

Email Address: artunger@att.net

Affiliation:

Subject: Kern County can mitigate

Comment:

Despite our year around bright blue weather, I do not think Kern County or Bakersfield encourages anyone to put solar PV on the roof. Government planners and authorities are now OKing housing projects and warehouses. Citizens do urge solar on the roof.

I hope you publish data asap showing how long it will take for instalers of solar on the roof in this part of the state to lower energy costs enough to get their money back.

Thanks, Art

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-09 14:47:01

No Duplicates.

**Comment 4 for Comments on staff's approach on residential and commercial projects under the CEQA (ceqa-rescom-ws) - 1st Workshop.**

First Name: Gillian

Last Name: Hayes

Email Address: ghayes@srcity.org

Affiliation: City of Santa Rosa

Subject: Comments on Preliminary Draft Staff Proposal

Comment:

Please see attached comment letter from the City of Santa Rosa

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-rescom-ws/5-arbcommentltr.pdf>

Original File Name: ARBcommentltr.pdf

Date and Time Comment Was Submitted: 2008-11-25 16:49:22

No Duplicates.

**Comment 5 for Comments on staff's approach on residential and commercial projects under the CEQA (ceqa-rescom-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-rescom-ws/6-nrdc\\_comments\\_to\\_carb\\_on\\_ceqa\\_thresholds\\_-\\_res\\_and\\_com.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-rescom-ws/6-nrdc_comments_to_carb_on_ceqa_thresholds_-_res_and_com.pdf)

Original File Name: NRDC Comments to CARB on CEQA Thresholds - Res and Com.pdf

Date and Time Comment Was Submitted: 2008-11-26 10:46:45

No Duplicates.

**Comment 6 for Comments on staff's approach on residential and commercial projects under the CEQA (ceqa-rescom-ws) - 1st Workshop.**

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



**Comment 7 for Comments on staff's approach on residential and commercial projects under the CEQA (ceqa-rescom-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 specific comments from City of Los Angeles staff related to residential and commercial projects, and evaluation of traffic-related impacts, in the attached comment letter.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-rescom-ws/8-arb\\_ceqa\\_ghg\\_thresholds\\_11-26-08\\_cmt\\_ltr.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-rescom-ws/8-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 13:17:37

No Duplicates.

## **Comment 8 for Comments on staff's approach on residential and commercial projects under the CEQA (ceqa-rescom-ws) - 1st Workshop.**

First Name: Steven

Last Name: Scoville

Email Address: sstermite@bigplanet.com

Affiliation:

Subject: Air Pollution

Comment:

The major streets in the Sacramento Area need (MUST) be timed correctly to keep large groups of cars from stopping then going and stopping again because the signal light is not timed properly. Cars idling for periods of time then accelerating and then stopping again and going again are an extreme source of air pollution in the Valley. Whoever is in charge of the proper signal light timing or function needs to be held accountable for the extra pollution THEY are causing.

I drive down Madison Avenue at least twice a day and at the rush hour times there will be blocks of 50-60 cars that get stopped at over half the lights because of improper light changes. From Auburn blvd cars driving east will have to stop or sometimes slow down at Hemlock and then get stopped at Garfield. This happens all day and is not the only spot that it occurs. Why can't the public works department, or whoever is in charge of this, ask for someone to help them drive and communicate to the controller when the proper time to change the light.

I use Madison Avenue as my example, but it also happens on ALL the major traffic arteries in the county and I bet in every major city. We spend all this money to put up fancy camera systems and I think it is by design to stop traffic or slow it down to avoid some accidents. I think the opposite is happening. The traffic moves along and then has to stop and I think this is causing more rear end accidents than what their use to be. Please get with the people in charge to get them fixed to slow down the green house gasses our cars are emitting.

Also, how do you know what the emissions were in 1990? Was there sufficient testing data to compare to back then? Do you really think that businesses are to blame and not the traffic loads that in the valley have probably doubled in those 18years? Does everyone know that what extra laws, rules, restrictions or anything else that is put onto business is passed onto the consumer? What you are doing to businesses, large and small affects everyone who uses that service or product.

I am really frustrated by the lack of care and responsibility a lot of employees that work in the public sector show towards the rest of the public that works in the private sector. This auto traffic is only one example of the many out there that I see and everyone else sees and we all let it happen. It needs to ALL stop.

Our roads, schools and everything else that is controlled by government must be made accountable. It is bad enough to see

billions of dollars now being spent to bail out huge companies that make bad decisions with no foresight to plan ahead. They are just like the government, spend, spend and spend some more and eventually the money will catch up, funny it never does. Small companies would just go bankrupt or sell if they did this. Any "for profit" companies should not be allowed to get free TAX PAYER money, how about a loan?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 11:29:39

No Duplicates.

## **Comment 9 for Comments on staff's approach on residential and commercial projects under the CEQA (ceqa-rescom-ws) - 2nd Workshop.**

First Name: Terry

Last Name: Parker

Email Address: terry.parker@dot.ca.gov

Affiliation: Caltrans (used to be at CARB)

Subject: Residential per-HH VMT numbers

Comment:

During today's hearing, there was a question about whether the 14,000 annual per-Household VMT rates proposed includes differences in household composition (e.g., two-employees, single, etc.) I have information about this that may be helpful. The answer is that - no - this data did not take such demographics into consideration. John Holtzclaw obtained it from the Dept. of Motor Vehicles based on vehicles' two-year odometer readings (which are required for smog checks). This is an extremely important issue, and needs to be addressed in this effort. FYI - Dr. Holtzclaw did a similar but much larger study than the one referenced in ARB's 1995 report for EDF & NRDC - e.g., for the Location Efficient Mortgage (LEM) program during the late 1990s that included data from all of the San Francisco Bay Area as well as all of Southern California. This study provides much more robust data and - because Dr. Holtzclaw also used some travel demand modeling for the LEM effort - it may provide insights regarding effects of household demographics and composition. (Dr. Holtzclaw can be reached via the California Sierra Club in San Francisco: John.Holtzclaw@sierraclub.org).

Also, here is some important information about a study that U.S. EPA is currently conducting to specifically address the need to address and include household composition (and other important demographics, such as income) in estimating vehicle trip and VMT reduction benefits associated with land use mitigation strategies (such as proximity to transit service and the other factors currently being considered in this effort). EPA originally developed the "4Ds" analysis approach for this purpose during the 1990s, and this current effort is updating and upgrading this analysis process (to 6 or 7 "Ds"). For additional information about that effort, suggest contacting: John Thomas, U.S. EPA Development Community and Environment Division, Washington D.C., email: Thomas.John@epamail.epa.gov

(As you may be aware, I was the project manager while working for ARB in the 1990s of both the 1995 study "Transportation-Related Land Use Strategies to Minimize Motor Vehicle Emissions" which is the source of the VMT/HH data, as well as the development and incorporation into Urbemis of the Motor Vehicle Mitigation module used to estimate the value of various land use development mitigation strategies.)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 15:19:03

No Duplicates.

**Comment 10 for Comments on staff's approach on residential and commercial projects under the CEQA (ceqa-rescom-ws) - 2nd Workshop.**

First Name: Chris

Last Name: Mundhenk

Email Address: cmundhenk@pbsj.com

Affiliation:

Subject: Neighborhood services

Comment:

Please provide some clarification as to what would qualify as a "neighborhood service". Is that to be limited to schools, parks, fire, police, etc? Or is it to be extended to certain or all retail commercial outlets, such as a grocery store?

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-12 10:07:01

No Duplicates.

**Comment 11 for Comments on staff's approach on residential and commercial projects under the CEQA (ceqa-rescom-ws) - 2nd Workshop.**

First Name: Junaid  
Last Name: Rahman  
Email Address: jnr@cpuc.ca.gov  
Affiliation:

Subject: Comments on GHG Staff Proposal  
Comment:

Mr. Ito,

Attached are comments from the California Public Utilities Commission on Preliminary Draft Proposal; Interim Significance Thresholds for Greenhouse Gases under CEQA.

Junaid Rahman  
Energy Division  
California Public Utilities Commission

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-rescom-ws/12-carb\\_ceqa\\_ghg\\_comments\\_1909.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-rescom-ws/12-carb_ceqa_ghg_comments_1909.doc)

Original File Name: CARB CEQA GHG comments 1909.doc

Date and Time Comment Was Submitted: 2009-01-09 11:33:31

No Duplicates.

**Comment 12 for Comments on staff's approach on residential and commercial projects under the CEQA (ceqa-rescom-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-rescom-ws/13-arb\\_ceqa\\_ghg\\_thresholds\\_1-09-09\\_cmt\\_ltr.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ceqa-rescom-ws/13-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 15:38:38

No Duplicates.



**There are no comments posted to Comments on staff's approach on residential and commercial projects under the CEQA (ceqa-rescom-ws) that were presented during the Workshop at this time.**