



**Planning & Redevelopment Department**  
311 Vernon Street  
Roseville, California 95678-2649

November 18, 2008

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

***Re: Comments on draft ARB Guidance on CEQA Thresholds***

The City of Roseville appreciates the opportunity to submit the following comments on the draft ARB Guidance on CEQA Thresholds. A measurement for assessing greenhouse gas impacts is welcome, and we recognize the effort involved with preparation of the guidance document, and the complexity of applying significance thresholds to potential global climate change impacts.

The City of Roseville has taken proactive steps to address global climate change impacts under CEQA. Early this year the City updated its General Plan to reflect climate change as an environmental issue, and identified existing General Plan policies that either reduce greenhouse gas emissions, or mitigate the effects of climate change. These policies are referenced in the City's CEQA documents. The City is also in the final stages of preparation of a Climate Action Plan, and it is our expectation that the plan will provide mitigation applicable to CEQA.

Since local jurisdictions will share the burden of ensuring projects are in compliance with the ARB Guidance it is important that the measures are equitable and straightforward. With this in mind, the City offers the following comments on the draft guidance document.

**1) Discourage Unnecessary EIRs**

An unintended consequence of ARB's proposed guidance may be unnecessary EIRs, which would be a significant cost to new development. The proposed guidance alternates between projects that are either exempt from CEQA, or projects that require an EIR, to include all feasible mitigation. A Mitigated Negative Declaration can also require that projects implement all feasible mitigation, at significantly less cost than an EIR, with the same end result. The guidance should identify, as an option, the possible use of Mitigated Negative Declarations.

**2) Add Flexibility to Box 2**

Please consider modifying Box 2 to be more flexible, so that it could be used sooner rather than later. For example if a City has a Climate Action Plan, a certified EIR that addresses Climate

Change, and General Plan policy that addresses GHGs, why isn't that considered sufficiently "enforceable"? Waiting for the regional transportation goals seems unnecessarily restrictive, when enforceable policy documents are in place.

### 3) Coordinate With Local Air Districts

As evidenced by the white paper prepared by CAPCOA, local air districts are actively seeking ways to address climate change under CEQA. Coordination between the air districts and ARB is needed to ensure a consistent and equitable approach. The variability between the air districts regulation of criteria pollutants, even among air districts within the same air basin, is evidence of the potential for discrepancy among CEQA thresholds. For a uniquely global impact such as climate change, there is every reason why all projects should be evaluated consistently statewide, and local air districts should be encouraged to apply thresholds consistent with the CARB guidance.

### 4) Cumulatively Considerable Impacts

The proposed guidance states that, "Staff believes that under some circumstances, projects that meet performance standards or include equivalent mitigation measures will have impacts that may still be cumulatively considerable and therefore significant." For this reason, staff recommends that, in addition to meeting performance standards or including equivalent mitigation measures, a project must also emit no more than "X" MTCO<sub>2</sub>e/yr." More information is needed regarding under what circumstances a project would meet performance standards and/or include equivalent mitigation measures, and would or would not still have cumulatively considerable impacts.

Intuitively, a distinction between cumulative contributions of projects makes sense in a scenario when considering criteria pollutants, where concentrations vary across air basins. However when considering global climate change, are not all projects that generate GHG's equivalent?

A final thought on this is that, in general, older less efficient development is demolished and/or replaced as new and more efficient development occurs. From a cumulative perspective, new development, when it is sustainable and energy-efficient, could be considered somewhat self-mitigating.

Thank you again for the opportunity to submit these comments on the proposed guidance document. If you have any questions, or would like additional information about actions being taken in the City of Roseville, please do not hesitate to contact Terri Shirhall, in the Planning and Redevelopment Department, at (916) 774-5422.

Sincerely,



Paul Richardson, Director

Planning and Redevelopment Department