



Doug Ito
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Planning and Technical Support Division
Air Resources Board
PO Box 2815
Sacramento, CA 95812

November 25, 2008

Re: ARB Preliminary Draft Staff Proposal, Recommended approaches for Setting Interim Significance Thresholds for Greenhouse Gases Under CEQA

Thank you for the opportunity to review and comment on the Air Resources Board Preliminary Draft Staff Proposal. The City of Santa Rosa is pleased that ARB has taken the steps to recognize that local jurisdictions will need direction regarding significance thresholds for CEQA review. The City of Santa Rosa would appreciate your consideration of the following items when amending the Preliminary Draft Staff Proposal document:

- **Common methodology for GHG measurement**-Whether the impacts are measured in metric tons, short tons or other form, it would be helpful to verify that the Office of Planning and Research is using the same numeric method for GHG analysis and measurement. Technical Resources-Modeling Tools to Estimate GHG Emissions from OPR's Technical Advisory dated June 19, 2008 offers calculations in several different measurement forms.
- **Preferred software for GHG calculation**-Our staff has found that different GHG calculators provide different GHG impact quantities. Please provide a preferred calculator(s) or software program(s) to encourage consistency among jurisdictions in regards to GHG analysis of impacts and mitigations. The City of Santa Rosa's desire would be for the ARB to sanction or certify preferred calculators.
- **Quantifiable Mitigation**-Numeric thresholds result in the need for mitigations to also be measurable. (This may tie into the software subject above). The analysis software should be consistently applied for impacts and mitigations, or the ARB should set specific numbers for specific mitigations.
- **Categorical Exemptions**-It appears that exemptions for residential and commercial projects may still be achieved. It would be useful if ARB provided specific conditions and examples for exemptions and a numeric threshold to ensure a quick review time for exemptions. For example, mixed use development or proximity to transit as requirements.

Thank you again for the opportunity to comment on ARB's Preliminary Draft Staff Proposal. Please feel free to contact Gillian Hayes, City Planner, with any further questions.

Sincerely,

A handwritten signature in black ink that reads "Charles Regalia".

Charles Regalia
Director of Community Development
City of Santa Rosa