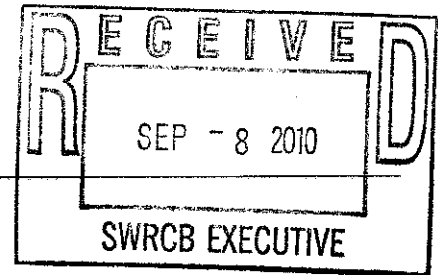


commentletters - Comment Letter - Proposed CEQA

From: "Fry, Vicki (SDA)" <fryv@sacsewer.com>
To: <commentletters@waterboards.ca.gov>
Date: Wednesday, September 08, 2010 11:55 AM
Subject: Comment Letter - Proposed CEQA



Ms. Townsend,

The Central Valley Clean Water Association's Air and Climate Change Committee appreciates this opportunity to comment on the proposed modifications to the SWRCB implementation of CEQA and their Substitute Equivalent Document (SED). Greenhouse gas emissions are part of, and inextricably linked to air quality. It is unclear to us how the two questions in the proposed Substitute Environmental Documentation Section VII, Greenhouse Gas Emissions, are substantially different than the questions currently listed under Section III, Air Quality. In regards to question b), it is unclear if statewide or local policies or regulations will apply in the event that those policies or regulations differ or are otherwise inconsistent. Further, section III begins with the clarifying statement "The significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations." This statement applied to greenhouse gas emissions would clarify that air quality management and control districts determine significance thresholds for greenhouse gases at a local level, and would allow for project development consistent with the different air management and control districts approaches to CEQA guidance.

Recommendation:

Rather than create another separate section, we strongly encourage SWRCB to include any proposed questions regarding greenhouse gas emissions under Section III, Air Quality. As discussed above, the two proposed additional questions are likely redundant and unnecessary if greenhouse gas emissions are included in Section III, Air Quality.

Again, we appreciate this opportunity to comment. Please feel free to contact me if you have any questions or wish to discuss these comments in detail.

Regards,

Vicki A. Fry, P.E.

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