Comment on OPR's Preliminary Draft CEQA Guideline Amendments

Thursday, January 22, 2009

Name: BARBARA BAIRD

Organization: SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Phone: (909) 396-2302

Email: bbaird@aqmd.gov

Comment:

1) Will OPR provide guidance on whether CEQA analysis should include out-of-state indirect impacts?

2) Guideline § 15126.4(c)(5), requiring off-site mitigation or carbon offsets to be part of a plan implemented by the relevant agency, should apply only to cases where the project contributes fees to provide its fair share of cumulative mitigation.

3) Will OPR provide guidance on whether mitigations can occur outside California?

4) We recommend OPR set up ~~a~~ a clearinghouse of mitigation programs that provide quantifiable + enforceable reductions such as the SCAQMD's SoCal Climate Solutions Exchange

5) We recommend OPR guidelines direct lead agencies to first consider in-project reductions, then on-site, then progressively farther away, to maximize criteria + toxic pollutant co-benefits

↳ otherwise, a project could not fully mitigate its emissions even from a project next door, if there is no plan by the relevant agency. [OVER]

If the concern is the reductions need to be additional or surplus to other requirements, this requirement could be put in the guidelines instead