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Subject: Comments on OPR draft CEQA guidelines

Personal Comments on Preliminary DRAFT CEQA Guidelines

1. 15064.h.e: Clarify that “the previously approved plan...” must be an approved plan that has an existing greenhouse gas mitigation plan that meets the goals of AB32.
2. 15064.4.a.1: Include something about long term 2050 reduction goals or at least allude to the fact that 2020 is not the end, but the middle.
3. 15064.4.b: Since quantification of greenhouse gases for a project is an evolving science, it is proper to allow both quantitative and qualitative mitigation, however there should be a requirement for the lead agency (or CARB until a protocol is developed?) to perform a good faith effort to quantify the emissions so that the actual mitigation can be determined
 - it would be reasonable to provide a long-term goal so that lead agencies have a long term understanding of where this process is leading; suggest something like the intent is for projects to mitigate 25% of their emissions in 2009, stepping up to 100% by 2020.
4. 15064.4.b: The California Energy Commission’s Title 24 energy code uses the term “Performance” as a computer analysis of a building and “Prescriptive” as a checklist of measures that must be complied with. It would be great if Performance and Prescriptive had the same meaning between the 2 documents.
5. 15126.4.c: Would like to see a prioritization of mitigation strategies where on-site mitigation is most highly valued; regional off-site is second priority and out of state is third priority.
 - a. Reasoning is that projects have negative impacts on the infrastructure that supports them; a given quantity of electricity, natural gas, water, sewer, roads, solid waste infrastructure can serve a larger quantity of green projects relative to standard project design
6. 15126.4.c: Would like to see a prioritization of mitigation strategies that is similar to the California Energy Commission loading order for new power plants; e.g. energy efficiency is highest priority; on-site renewable power generation is second priority and in this case off-site renewable power generation would be third choice (e.g. SMUD SolarShares program allows customers to purchase zero carbon emissions power at a premium).
7. 15126.4.c.4: Would like to see an upper limit as to what is allowable as sequestration.

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