

## Lockey, Heather@CNRA

---

**From:** Molly Wright <MWright@airquality.org>  
**Sent:** Wednesday, March 7, 2018 12:09 PM  
**To:** CEQA Guidelines@CNRA  
**Cc:** Paul Philley; Karen Huss  
**Subject:** FW: Notice of Proposed Rulemaking Regarding the CEQA Guidelines  
**Attachments:** SMAQMD\_CEQA Guidelines Update.pdf

Dear Mr. Calfee,

Please accept the Sacramento Metropolitan Air Quality Management District's comments (attached) on the November 2017 Proposed Updates to the CEQA Guidelines and Technical Advisory on Evaluating Transportation Impacts in CEQA.

Molly Wright, AICP | Air Quality Planner / Analyst  
**Sacramento Metropolitan Air Quality Management District**  
777 12<sup>th</sup> Street, 3<sup>rd</sup> Floor, Sacramento, CA 95814 | (916) 874-4207 | [www.airquality.org](http://www.airquality.org)

---

**From:** Calfee, Christopher@CNRA [mailto:Christopher.Calfee@RESOURCES.CA.GOV]  
**Sent:** Friday, January 26, 2018 1:06 PM  
**To:** CNRA\_CEQA\_GUIDELINE@LISTSERVICE.CNRA.CA.GOV  
**Subject:** Notice of Proposed Rulemaking Regarding the CEQA Guidelines

The Natural Resources Agency's proposed updates to the Guidelines Implementing the California Environmental Quality Act are now available. The proposed changes to the Guidelines and related rulemaking materials are available on the Agency's website at <http://resources.ca.gov/ceqa/>. Public hearings will be held in Los Angeles on March 14, 2018 and in Sacramento on March 15, 2018. Written comments must be submitted by 5:00pm on March 15, 2018. Hearing locations, instructions for submitting comments and related information regarding the rulemaking process is contained in the Notice of Proposed Rulemaking.

Christopher Calfee  
Deputy Secretary and General Counsel  
California Natural Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814  
(916) 653-5656

March 7, 2018

**SENT VIA EMAIL**

Christopher Calfee  
Deputy Secretary and General Counsel  
California Natural Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814

**RE: November 2017 Proposed Updates to the CEQA Guidelines and Technical Advisory on Evaluating Transportation Impacts in CEQA**

Mr. Calfee:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) thanks the Governor's Office of Planning and Research (OPR) and the Natural Resources Agency (NRA) for the opportunity to review the November 2017 *Proposed Updates to the CEQA Guidelines* (Guidelines) and *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Advisory). SMAQMD comments on these documents follow.

**Analyzing Impacts from Greenhouse Gas Emissions**

We commend the use of "determining the significance" in the section on analyzing impacts from greenhouse gas (GHG) emissions (15064.4). In meeting California's GHG reduction goals, it is critical that lead agencies understand that CEQA documents must disclose a project's potential impacts on GHG emissions, climate change, and adaptation, and make a GHG significance determination. The inclusion of "determining the significance" in this section helps clarify the necessity of a GHG emissions significance determination.

We also support this section's discussions on quantifying GHG emissions, analysis of a project's reasonably foreseeable incremental contribution to climate change, and consideration of the project's consistency with State's climate goals. While the Guidelines frame this information and analysis as options, we believe that quantifying GHG emissions and analyzing consistency with State climate goals are essential to the public disclosure required by CEQA. Likewise, we believe the Guidelines should include language that frames this information and analysis as essential to the public disclosure required by CEQA.

**Analyzing Transportation Impacts**

SMAQMD commends the use of vehicle miles traveled (VMT) as a metric for significance in meeting the requirements of SB 743. We note, however, that for transportation projects, lead agencies have discretion to determine the appropriate measure of

**November 2017 Proposed Updates to the CEQA Guidelines and Technical Advisory on Evaluating Transportation Impacts in CEQA**

March 7, 2018

transportation impact, according to the Guidelines' section on analyzing transportation impacts (15064.3).

Transportation investments in California have substantial influence on the built environment and the VMT generated by those land uses. Mobile source emissions continue to impact local air basins and the climate; and an accurate assessment of VMT, including induced VMT, is necessary to determine reasonably foreseeable project air quality impacts for both land use and transportation projects. SMAQMD recommends that the Guidelines identify VMT assessment as important to an accurate, complete assessment of roadway project environmental impacts, ultimately including air quality impacts.

**Appendix G / Air Quality**

The updates to the Air Quality section of Appendix G include the following text: "d. Result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people?" The first use of "substantial" does not adequately capture risk from localized impacts. We recommend changing the sentence to "d. Result in emissions (such as odor or dust) that result in localized adverse impacts to a substantial number of people?"

**Conclusion**

Thank you for your attention to our concerns. If you have additional questions or require further assistance, please contact Molly Wright at [mwright@airquality.org](mailto:mwright@airquality.org) or 916-874-4207.

Sincerely,

A handwritten signature in black ink that reads "Paul Philley". The signature is written in a cursive style with a large initial "P".

Paul Philley, AICP  
Program Supervisor  
Sacramento Metropolitan Air Quality Management District