

August 26, 2009

Christopher Calfee, Special Counsel  
ATTN: CEQA Guidelines  
California Resources Agency  
1017 L Street, #2223  
Sacramento, CA 95814

**RE: Proposed Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas (GHG) Emissions Pursuant to SB97**

Dear Mr. Calfee:

The Riverside County Waste Management Department (RCWMD) has reviewed the above-mentioned proposed CEQA Guidelines amendments prepared by your agency and offers the following comments for your consideration.

**§ 15064.4(b) Determining the Significance of Impacts from Greenhouse Gas Emissions:**

- The amendment should make a distinction between anthropogenic and biogenic GHG emissions and then clearly state that GHG impact assessment be based on net anthropogenic emissions of the project.
- The amendments should allow the option of a statewide threshold of significance, if established by the Air Resources Board, for determination of a project's incremental contribution to cumulative GHG emission impact.

**§ 15093. Statement of Overriding Considerations:**

- § 15093(d) is a new guideline which states that when an agency makes a statement of overriding considerations, the agency may consider local adverse environmental effects in the context of region-wide or state-wide benefits. It is recommended that this guideline be modified to add specificity as to the kind of region-wide or state-wide benefits appropriate for overriding considerations.

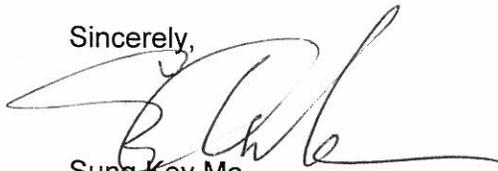
**§ 15125. Environmental Setting:**

- This section of the existing Guidelines needs to be amended to clearly call out the baseline conditions upon which assessment of GHG emission impacts is based. The existing guidelines emphasize conditions in the vicinity of the project as being the regional/baseline conditions, which is easy to define for traditional impacts. However, the boundaries of GHG emission impacts are more difficult to define, and hence, so are the regional/baseline GHG emission conditions. It is recommended that this section be modified to add a separate definition for the environmental setting of a project that will constitute the baseline conditions by which a lead agency determines whether the project's GHG emission impact is significant.

Thank you for the opportunity to comment on the proposed amendments to the State CEQA Guidelines. The RCWMD would appreciate written notification when the final draft of the amendments and a public hearing for adoption of the proposed amendments is available.

Should you have any questions, I may be reached at 951-486-3200.

Sincerely,



Sung Key Ma  
Urban Regional Planner IV

SKM:skm

cc: Alex Gann, Executive Office  
Gary Anderson

PD# 80705