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Subject: Re: [CEQA_Rulemaking] Revised Text of SB 97 CEQA Guidelines Amendments Available for Public Review

It seems to us that the "should" in the following sentence should be "shall."

§15064.4(a):

"A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data on available information, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project."

We reiterate our previous comments requesting guidance on whether section (a) or (b) of 15126.6(e)(3) is appropriate for selecting the No Project Alternative for a regional transportation plan. This issue becomes especially significant for this Guidelines revision, because regional transportation plans are proposed to be added to the Guidelines for purpose of tiering.

(§ 15130(b)(1)(B) and (d))

If the analysis used to produce an RTP fails to identify feasible mitigations (namely, by cancelling VMT- and GHG-inducing projects) because they have become invisible by being placed in the No Project Alternative, tiering off of the RTP will fail to maximally reduce GHG emissions. This would mean that the Guidelines revisions have failed to provide an appropriate analytic framework for the evaluation and mitigation of GHGs. Please revisit this subject.

Thank you for considering these comments.