

## Letter 14

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### **Comment 14-1**

Revise Section 15064.4(b)(1) to direct lead agencies to consider whether a project will increase or decrease greenhouse gas emissions compared to the existing environmental setting considering both temporal and spatial context.

### **Response 14-1**

The Natural Resources Agency declines the invitation to add the phrase “when considered in a temporal and spatial context.” The proposed text in subdivision (a) of section 15064.4 already signals to lead agencies that the determination of significance should be determined “in the context of a particular project[.]” Additionally, the existing CEQA Guidelines already instruct lead agencies to consider all phases of a project, which should allow full consideration of a project’s “temporal ... context.” (State CEQA Guidelines, §§ 15063(a) (“[a]ll phases of project planning, implementation, and operation must be considered in the initial study...”), 15126 (“[a]ll phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation”).) Regarding a project’s “spatial context,” existing section 15064(b) already recognizes that “the significance of an activity may vary with the setting.” Thus, addition of the suggested phrase to section 15064.4 is not necessary.

### **Comment 14-2**

Revise Appendix G: Agriculture and Forest Resources to include specific reference to Government Codes allowing for a more accurate analysis of impacts to forestlands or timberlands as a result of rezoning or land subdivision.

### **Response 14-2**

The comment suggests numerous additions to the Appendix G checklist regarding forestry impacts. The Natural Resources Agency revised the proposed amendments to those Appendix G checklist questions to add a reference to “timberland zoned Timberland Production.” The Agency declines, however, to incorporate the remainder of the suggested text because the Agency finds it to be unnecessary. For

example, the other additions to question (c) would address conversion of forestry uses. Conversion is already addressed in the text in question (d), however. The second and third suggested questions also ask about forestland conversion. While those suggested questions address specific types of activities that could ultimately cause conversion, those activities would already fall within the more general concept of conversion addressed in the already proposed question (d).

The last suggested question would ask whether a project would cause a cumulatively considerable decrease in numerous, specified forest benefits. Appendix G already includes questions relating to aesthetics, biology, water quality and recreation, so the addition of such questions in the section on forestry would be duplicative. Sequestration value could be considered in the already proposed questions related to forestry impacts. Finally, a question about impacts to “wood products and other forest products” would appear to address primarily economic concerns which would normally not be a proper subject of a CEQA analysis. (State CEQA Guidelines, § 15131.) Thus, except for the reference to “timberland zoned Timberland Production,” the Natural Resources Agency finds that the questions suggested in this comment are unnecessary.

#### **Comment 14-3**

Add to Appendix G: GHG Emissions Checklist a question regarding the project’s overall effect of reducing the capacity of land to reduce GHG levels by means of sequestration or removal of vegetation.

#### **Response 14-3**

The Natural Resources Agency declines to incorporate the suggested question into the Appendix G questions related to greenhouse gas emissions. As explained in the Initial Statement of Reasons, the questions related to greenhouse gas emissions in Appendix G “are necessary to satisfy the Legislative directive in section 21083.05 that the effects of GHG emissions be analyzed under CEQA.” (Initial Statement of Reasons, at p. 64.) As explained in Response 14-2, above, the sequestration value of forests and other vegetation could fall within the more general questions related to forestry, agriculture and biology in other sections of Appendix G.

#### **Comment 14-4**

Revise Appendix G: Hazards question (h) to include projected changes in the environment as a result of land use changes that may increase the severity and/or risk of wildfire.

#### **Response 14-4**

The Natural Resources Agency declines to incorporate the suggested text into question (h) related to wildfire hazards because the added text is unnecessary. First, the suggested text relates to ways that urban and suburban development in wildfire areas increases the risk and difficulty in fighting wildfires.

Those impacts are already encompassed in the existing text of question (h), which asks: “Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?” No evidence is presented to suggest that the existing text is not sufficient. Additionally, adding more specific language to that question could cause readers to ignore causes of wildfire risk that are specifically listed. Finally, the Note proposed to be added to Appendix G makes clear that the questions are intended to provoke “thoughtful assessment of impacts” and that “[s]ubstantial evidence of potential impacts that are not listed on this form must also be considered.” Thus, because the broad language in question (h) already encompasses the concerns expressed in this comment, no further revisions are necessary in response to this comment.

#### **Comment 14-5**

Add to Section 15126.4(c) to specifically identify measures that utilize materials in a carbon-neutral manner to produce energy that would otherwise produce emissions.

#### **Response 14-5**

The Natural Resources Agency declines to incorporate the suggested text into section 15126.4(c) addressing mitigation of greenhouse gas emissions. As explained in the Initial Statement of Reasons, that section “identify[ies] five general methods of mitigation that may be tailored to the specific circumstances surrounding a specific project.” (Initial Statement of Reasons, at p. 37.) The CEQA Guidelines apply generally to all public agencies and projects subject to CEQA, and must therefore be written in broad language. A lead agency could consider such alternative energy projects, if appropriate, as off-site or on-site mitigation, depending on the characteristics of the project. Notably, subdivision (c)(2) already refers lead agencies to measures listed Appendix F, which includes “increasing reliance on renewable energy sources.” Therefore, the Natural Resources Agency finds the proposed text to be unnecessary.