

July 20, 2018

SENT VIA EMAIL

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

**RE: July 2018 Proposed 15-Day Revisions to the California  
Environmental Quality Act Guidelines**

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 July 2018 *Proposed 15-Day Revisions* (Revisions) to the California Environmental Quality Act (CEQA) Guidelines. Following are SMAQMD comments on the Revisions.

**§15064 Determining Significance of Environmental Effects**

California's ambitious greenhouse gas (GHG) reduction and air quality goals require a team effort to achieve. For example, air quality management districts help ensure air quality and GHG emissions standards at the regional level; and their thresholds are informed by a thorough knowledge and understanding of the air quality conditions and conformity considerations for the geographic area of their jurisdiction. As such, thresholds of significance should be more broadly defined in §15064(b)(2). Under the current proposal, thresholds of significance are defined according to §15067(a). This should be broadened to include the entirety of §15067, to include the full range of applicable thresholds.

**§15064.3 Determining Significance of Transportation Impacts**

All of our comments on the November 2017 CEQA Guidelines update proposals still apply. In sum, SMAQMD commends the use of vehicle miles traveled (VMT) as a metric for significance in meeting the requirements of SB 743. We maintain, however, that 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*.

**§15064.4 Determining Significance of Impacts from Greenhouse Gas Emissions**

Summarizing our comments on the November 2017 CEQA Guidelines update proposals, we commend the use of "determining the significance" in the section on analyzing impacts from GHG emissions. Further, we support the 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, and believe the Guidelines should include language that frames this information and analysis as essential to the public disclosure required by CEQA.

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**§15301 Existing Facilities**

We commend the text addition to §15301(c), which clarifies that sustainable transportation improvements are included in the “Existing Facilities” category. These projects are ordinarily insignificant in their impact on the environment. Based on their potential to reduce polluting emissions from transportation, it is especially appropriate that they are not subject to undue regulatory burden.

**Conclusion**

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

Sincerely,

A handwritten signature in cursive script that reads "Paul Philley".

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