

Lockey, Heather@CNRA

From: Emily Bacchini <Emily.Bacchini@smud.org>
Sent: Thursday, March 15, 2018 10:34 PM
To: CEQA Guidelines@CNRA
Subject: SMUD Comments on the Notice of Proposed Rulemaking
Attachments: SMUD Comment Letter on CEQA Guideline Revisions.pdf

Please see the attached letter with comments from SMUD on the Notice of Proposed Rulemaking; Amendments and Additions to the State CEQA Guidelines.

Thanks!!

Emily

Emily Bacchini

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Sent Via E-Mail

March 15, 2018

Christopher Calfee
Deputy Secretary and General Counsel
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814
CEQA.Guidelines@resources.ca.gov

Subject: Notice of Proposed Rulemaking; Amendments and Additions to the State
CEQA Guidelines

Dear Mr. Calfee,

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Notice of Proposed Rulemaking; Amendments and Additions to the State CEQA Guidelines. We commend the work that the Office of Planning and Research and the Natural Resources Agency has undertaken to review and provide the amendments and additions presented in this proposed rulemaking and are in support of all of the changes provided.

In addition to the changes provided, SMUD would like to request an additional change to Section 15303, New Construction or Conversion of Small Structures, (d). It is our request that the last portion of this item be deleted – “,to serve such construction.” SMUD undertakes projects regularly that it considers to fall under the definition of the Class 3 exemptions, a “limited number of new, small facilities or structures.” While the list of examples is not inclusive, having this clause in part (d) seems to limit the applicability of utility extensions to those needed to serve the other small structures provided as examples.

SMUD appreciates the opportunity to provide comments on the Notice of Proposed Rulemaking; Amendments and Additions to the State CEQA Guidelines. If you have any questions or need any additional information on this comment letter, I can be reached at (916) 732-6334 or by email at Emily.bacchini@smud.org.

Sincerely,



Emily Bacchini
Environmental Services Supervisor
Sacramento Municipal Utility District
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