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Tom Last, Planning Director  
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Dear Mr. Last:

I am a Grass Valley resident and am currently a practicing environmental planner and scientist with over 7 years of experience in CEQA compliance. I have prepared or assisted in the preparation of many environmental impact reports, initial studies, and technical reports used to support CEQA documents. Unfortunately, I have not had an opportunity to spend a lot of time reading through this DEIR. I am only providing cursory and “big picture” comments to the Energy Section (Section 4.15) of the DEIR. These comments point to errors in the DEIR, where the DEIR does not fully analyze several specific impacts to the environment. Thus, related to Energy impacts, the DEIR does not meet one of the basic purposes of CEQA to “inform governmental decision makers and the public about potential, significant environmental effects of proposed activities” (CEQA Guidelines CCR Title 14, Chapter 3, Article 1, Section 15002). To fully comply with CEQA, the DEIR will need to be recirculated in order to readdress the impact analyses in the Energy Section that are currently inadequate. I look forward to another opportunity to review the DEIR more thoroughly when it is recirculated.

### **Energy Resources Constraints**

The first bullet in the Significance Criteria in the Energy Section, Section 4.15.3, states that “[a project would generally result in a significant energy impact if it would] substantially increase the consumption of electricity, natural gas, gasoline, diesel, or other non-renewable energy types such that energy resources would be constrained”. This statement and the analysis related to this impact are flawed in several ways. Under CEQA, the analysis of a project’s effects to energy resources should include all types of energy resources, renewable and non-renewable. In the context of this impact, Appendix F of the CEQA Guidelines creates no distinction between renewable and non-renewable energy sources. Impact 4.15-1 appears to be the only impact analysis in the Energy Section that specifically attempts to address whether the project would result in a constraint to energy resources. However, Impact 4.15-1 only specifically addresses energy use during project construction. No impact analysis or discussion in the Energy Section specifically addresses whether the operation, maintenance, or reclamation activities would substantially increase the consumption of energy resulting in a constraint to energy resources. Additionally, the description of Impact 4.15-1 in the Executive Summary of the DEIR, falsely summarizes Impact 4.15-1, stating, “substantial consumption of energy such that existing supplies would be constrained.” This statement

in the Executive Summary implies that Impact 4.15-1 addresses more than just energy use during construction activities.

The flaws in the analysis of the project's energy use in relation to whether energy resource would be constrained has resulted in an incomplete impact analysis. This analysis does not provide adequate or accurate information about whether this impact would result in a significant environmental effect. As such, the analysis of this impact needs to be readdressed in a recirculation of the DEIR. This impact analysis must focus on all sources of energy, including non-renewable energy sources; and it must address energy use during the entire life of the project, including construction, operation, maintenance, and reclamation activities. Additionally, the recirculated DEIR must properly summarize the impacts in the Executive Summary Section.

### **Wasteful Use of Energy Resources**

The DEIR does not provide a complete analysis of whether the project would result in a wasteful consumption of energy. The second bullet in the Significance Criteria in the Energy Section, Section 4.15.3, states that “[a project would generally result in a significant energy impact if it would] result in the wasteful use of energy resources that are not renewable”. Along the lines of this significance criteria, the DEIR analyzes and discusses whether the project would result in wasteful uses of electricity (Impact 4.15-2), natural gas (Impact 4.15-3), and petroleum (Impact 4.15-4). As the impact Significance Criteria specifically addresses energy resources that are not renewable, the reader must interpret that the impact analysis related to electricity (Impact 4.15-2) and the determination of whether the impact would be significant is specific to electricity derived from non-renewable sources. As stated above, under CEQA, the analysis of a project's effects to energy resources should not be restricted to only non-renewable energy types. In this context, Appendix F of the CEQA Guidelines creates no distinction between renewable and non-renewable energy sources.

To determine whether the project would result in a significant effect as a result of a wasteful use of energy, the DEIR must be recirculated with an analysis describing whether all project activities would result in a wasteful consumption of energy. This analysis must include all energy resources that would be available, whether renewable or nonrenewable.

### **Interruption of service during operation**

The third bullet in the Significance Criteria in the Energy Section, Section 4.15.3, states that “[a project would generally result in a significant energy impact if it would] result in a reduction or interruption of existing electrical or natural gas services due to construction or operation of project features.” The DEIR does not address reduction or interruption of existing electrical or natural gas services due to project operation. Impact 4.15-1 addresses interruptions in existing electrical or natural gas service during construction activities. Therefore, the DEIR does not completely address this impact and does not provide adequate or accurate information about whether this impact would result in a significant environmental effect. The DEIR must be recirculated to address whether project operation would result in a significant reduction or interruption of the existing

electrical or natural gas services. Additionally, the recirculated DEIR must include an analysis of whether reclamation activities would result in a significant reduction or interruption of the existing electrical or natural gas services.

Please contact me if you have any questions or require any clarifications regarding these comments.

Thank you,

Geoff Thornton