From: Hingtgen, Robert J
To: Boparai, Poonam
Cc: Gungle, Ashley; Fogg, Mindy
Subject: RE: Soitec EIR sections
Date: Tuesday, September 24, 2013 7:40:40 AM

Poonam,
I would like to talk further regarding #1. Let me know when you're scheduled to be back in the office.
We can reiterate the comment for the PDF (#2).

Thanks,
Rob

From: Boparai, Poonam
Sent: Monday, September 23, 2013 4:52 PM
To: Hingtgen, Robert J
Cc: Gungle, Ashley; Fogg, Mindy
Subject: RE: Soitec EIR sections

Hi Rob,

You're correct on #1. We don't have site-specific studies. I'm fine with not discussing the qualitative benefits; however, this means that there isn't enough supporting evidence for the significance conclusion for the overall project with respect to the mass emissions threshold. This was original comment; also see my comment in the Word file for more details. We can discuss further if that makes it easier.

Regarding #2, could you add/reiterate the comment regarding the PDF in the file? Thanks.

Ashley, Mindy - I was standing by for the call at 2 but I'm guessing you didn't need me on the line? Let me know if there is anything I need to follow up on.

-Poonam

From: Hingtgen, Robert J
Sent: Friday, September 20, 2013 11:49 AM
To: Boparai, Poonam
Cc: Gungle, Ashley; Fogg, Mindy
Subject: RE: Soitec EIR sections

Poonam,
Re GHG bullet 1: I haven't gone through this chapter yet, but since LanE and LanW are not part of the AB900 certification and we don't have GHG studies for these sites (correct), I believe we can analyze further, including any necessary offset requirements, when permits are applied for. I don't believe it's appropriate to provide a qualitative explanation of the 'benefits' of these two projects.

Re GHG bullet 2: The offset requirement (purchase of credits) must be included as a PDF for the TDS and Rugged sites to show that the County is fulfilling our requirements under AB900. The PDF should be written in a way that requires this offset prior to commencement of grading/construction activities, not as an ongoing measure. Including this requirement as a PDF will also make it easier to track and condition.

Thanks,
Rob

From: Boparai, Poonam
Sent: Thursday, September 19, 2013 3:43 PM
To: Hingtgen, Robert J
Cc: Gungle, Ashley; Fogg, Mindy
Subject: Soitec EIR sections

Hi Rob,

Here are the Soitec EIR sections with my edits/comments. I only had minor textual changes to the AQ section. It looks like we will be provided inserts of updated emissions data for LanEast and LanWest and for the additional water transport.

On GHG I have two comments:

- First one is regarding the significance conclusion for the proposed project. It relies on the offsets for TDS and Rugged to state that there would be no net increase in emissions. However, there are no offset requirements for LanEast and LanWest. So there would be an increase in emissions. I think we can address this by discussing the benefits of renewable energy generation by the project. I've added a comment on Page 45. Please let me know what you think.
- The second comment is about the offset requirements under AB 900. We had previously commented that the offset requirement be included as a PDF. However, the section only states that the project would be conditioned to purchase offsets but does not include this as a PDF. Since the County is the responsible agency for this action, I feel that this should be formalized as a design feature we can track. Do you think it is adequate to not include it as a PDF but include it as an ongoing condition of approval?

Let me know if you'd like to discuss.

Thanks,
-Poonam