

November 21, 2016

Director Ken Alex
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

RE: CEQA Guidelines Update - SUPPORT

Dear Director Ken Alex and Staff:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) would like to extend our support and for OPR's proposed updates to the CEQA guidelines and interpretation of the Supreme Court decision.

ARCCA is a network of existing regional collaboratives from across California. Our members represent leading regional collaboratives that are coordinating and supporting climate adaptation efforts in their own regions to enhance public health, protect natural systems, build economies, and improve quality of life. Through ARCCA, member regional collaboratives come together to amplify and solidify their individual efforts, as well as to give a stronger voice to regionalism at the state and federal levels. ARCCA bolsters the efforts of member collaboratives and empowers those interested in forging new regional partnerships. ARCCA's membership covers nearly 80 percent of the state and includes leading collaboratives from the San Francisco Bay Area, Los Angeles region, San Diego region, Capital region, and the Sierra Nevada.

With regard to the proposed amendments, we feel that the first, third, and fourth additions in particular provide greater clarity and responsiveness to the guidelines to align with the risks we face from climate change. Consideration of "risks exacerbating" requires projects to consider the interactive effects of projects and project risks, which we anticipate will be of increasing concern as climate change risks increase over time. Similarly, the addition of consideration of "direct, indirect, and cumulative effects" also allows projects and planners to consider feedback loops between projects and local conditions and factors to develop a more comprehensive and accurate assessment. Finally, and most importantly, with increasing and changing risks over time from climate change, adding a consideration of future risks appropriately shifts the focus to projected risks rather than what we have seen in the past.

We look forward to supporting the implementation of the updated CEQA guidelines that will help agencies take further steps to reduce the impact and exacerbation of risks posed by proposed projects.

Sincerely,



Larry Greene
ARCCA Chair
Capital Region Climate Readiness Collaborative