

From: Tim Frank
Sent: Wed 5/30/2012 5:26 PM
To: CEQA Guidelines
Subject: Income qualified VMT

I write to offer the comments of the Center for Sustainable Neighborhoods on revisions to the CEQA guidelines to respond to SB 226.

I generally agree with the notion that CEQA streamlining for residential projects should be reserved for projects located in areas where the occupants can be expected to generate less than the regional average vmt/capita. I would suggest, however, that rather than just looking at the numbers for all housing, that you consider allowing projects that are restricted to use by certain populations (e.g. low income, farmworkers, seniors) to use vmt data specific to those populations.

To illustrate the value of this approach, take Marin County as a case study. Marin County is essentially a high value bedroom community for high wage professionals who commute each day to jobs on the San Francisco Peninsula. But it is also a low wage employment center with large numbers of jobs (teachers, cops, retail, gardeners etc) oriented towards servicing the high income homeowners. If you look at overall vmt/household in Marin County, you will find a high number, but that is because you are measuring the performance mostly of high wage commuters who commute to the Peninsula. According to "Miles from Home," a study recently published by the Non Profit Housing Association of Northern California, low income housing residents in Marin County are much more likely to work locally. Moreover, the acute shortage of affordable housing in Marin County forces large numbers of low income workers to commute long distances from counties to the north and east with more affordable housing. Accordingly, building more affordable housing in Marin County is a means to help reduce regional vmt. But that is not all.

Encouraging the production of affordable housing is an important state goal in its own right. Encouraging that production in areas that feature both substantial low income employment and sky high housing values will help reduce in-commuting to such areas, and hence to reduce greenhouse gas emissions. It will allow more low income workers to send their kids to school in the communities with high performing schools, thereby dramatically improving the educational prospects for their children. It will reduce concentrated poverty within the region. These are co-benefits to the greenhouse gas emissions reductions, something that AB 32 specifically encouraged consideration of.

AB 32, SB 375 and SB 226 all are explicitly built around the premise that we can strengthen our economy, improve our environment and build a healthy society all at the same time. That is the promise of sustainability, and the hallmark of good economic development.

Thanks for your consideration,

Tim Frank, Director

Center for Sustainable Neighborhoods

FYI, the following is the link to the Miles from Home study:

http://nonprohousing.org/pdf_pubs/Miles_from_Home_LowRes.pdf