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File Number 7300400

CEQA Guidelines Update
 c/o Christopher Calfee
 1400 Tenth Street
 Sacramento, CA 958141

Dear Mr. Calfee:

SUBJECT: CEQA Streamlining for Infill Projects (SB 226, Simitian)

On behalf of the San Diego Association of Governments (SANDAG), we appreciate the opportunity to comment on the revised proposed Guidelines for Implementation of the California Environmental Quality Act (CEQA). Before providing specific comments on the revised Guidelines, SANDAG does provide the following observation about this effort. There has been an increased focus on streamlining infill development in areas supported by transit and where existing infrastructure is present. We believe that CEQA streamlining under Senate Bill 226 (SB 226) and other streamlining efforts such as SB 375 establish a set of criteria that are so narrow that few projects will likely end up being eligible. If the intent is to offer streamlining provisions that will be more readily utilized and facilitate more infill development, a holistic approach to drafting CEQA exemptions and streamlining provisions that are not so narrowly focused should be considered.

After reviewing the revised Section 15183.3 (Streamlining for Infill Projects), the revised Appendix M (Performance Standards), and the revised Appendix N (Infill Environmental Checklist form), SANDAG has provided input to ensure that the guidelines are implemented with the original intent of SB 226 (Simitian, 2011).

The following comments outline areas within the revised Section 15183.3 and revised Appendix M where further clarification is needed as these guidelines move forward:

- **Flexibility for Lead Agency Discretion in Streamlining Findings.** SANDAG encourages the Office of Planning and Research (OPR) to provide flexibility for a Lead Agency to make a decision on projects that meet the guidelines but are not compatible with the intent of SB 375 (Steinberg, 2008) and SB 226. For example, a suburban style single use development with minimal pedestrian facilities within a low vehicle miles traveled (VMT) zone would meet the streamlining provisions, but would not necessarily meet the intent of reducing greenhouse gas emissions through coordinated land use and transportation planning. The guidelines are silent on these types of

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situations, and further clarification is needed to ensure that projects that are chosen are projects that meet the intent of the two bills.

- **Streamlining in Vacant Infill Areas.** The guidelines should provide guidance for urban zones that only contain vacant space or parking lots. For example in San Diego, most analysis zones downtown are one city block and may only contain a parking lot or vacant land in the current year. These zones are prime candidates for redevelopment that furthers the goals of SB 375. The provisions should provide for an opportunity for streamlining in vacant zones surrounded by urban uses.
- **High Quality Transit Corridor.** Under the definitions section, high quality transit corridor should be expanded to include all rail modes including trolleys and commuter rail.
- **Proximity to Housing.** For commercial project streamlining, the guidelines should more broadly define proximity to households to include certain types of group quarters such as military barracks and college dormitories.
- **Consistency with United States Census Bureau Definitions.** SANDAG encourages OPR to use definitions consistent with U.S. Census Bureau for housing units and households. In the commercial project guidelines, SANDAG assumes the OPR reference to households actually refers to housing units as opposed to occupied housing units (i.e. Census households).
- **Streamlining for Office Projects Proximate to a High Quality Transit Corridor.** For office project streamlining, the guidelines should allow for streamlining a project proximate to a major transit stop *or High Quality Transit Corridor* to be consistent with the guidelines for residential projects.

Again, thank you for the opportunity to comment on the proposed CEQA Guidelines, if you have any questions, please feel free to contact Clint Daniels, Manager of Regional Models, at 619-699-6946.

Sincerely,



CHARLES "MUGGS" STOLL
Director of Land Use and Transportation Planning

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