

Name: C.R. & Barbara Folwer
Organization: Public
Date Received: August 27, 2009

Subject: Opposed to removal of Parking issue in Initial Study Checklist

Mr. Christopher Calfee, Special Counsel
Attn: CEQA Guidelines
California Natural Resources Agency
1017 L. Street, #2223 Re: Proposed Amendments to

CEQA Guidelines

Sacramento, CA 95814 Opposed to removal of Parking issues
in Initial Study

Dear Mr. Calfee:

The CECA Initial Study checklist is an absolutely essential and brilliant tool for the responsible development of any project in California. It is time for this excellent State checklist to be enforced better, not weakened further.

We have just emerged poorer after a year's fight with Appeals on four CEQA Appeals against our city (colluding with institutions and developers), parking violations being among their most common violations, with numerous negative environmental effects. The city's and the developer's big law firms know and use many legal but deceitful direct and indirect methods to avoid enforcing CEQA standards which get in their way of desired development. You must know how their cozy system operates. Most citizens still do not know.

Common citizens do not know enough nor have the money or professional help to have an equal playing field, so the State must hold tight on the standards in order to help the common citizen against the cities and developers' encroachments on the environment. The environment is lost if the State weakens. Parking considerations are primary among these.

Strict Parking guidelines in the Initial Study are the ONLY safeguard the average residential neighborhood has against institutional encroachment. They are the only incentive and protection the city has against overbuilding pressures. Inadequate parking consideration permits repeated mistaken overbuilding and encroachment on adjacent zones unfairly. Lead agencies DO NOT address any items the initial checklist does not require - be realistic! If it's not in the Initial Study, cities and developers ignore and denigrate protesting citizens, sometimes publicly - they can do it even if it is because they have imbalanced power.

Only because CECA presently requires Parking in the Initial Study were colleges near us finally, after Appeals and lawsuits, willing to consider limiting cars on campus and building parking for those they permit. The City's repeated illegal permissions to expand College density without

commensurate parking, deliberately bypassing CEQA requirements for years till this lawsuit, caused the parking problems that now exist.

Having Parking in the Initial Study Checklist is the only thing which forces cities, institutions, and businesses to really consider adjacent resident's views. It is the only way residents can hear about what's being considered in time to have meaningful input. Because what isn't in the checklist mostly gets through the way the developer wants because they work constantly with city staff on projects the citizens know nothing about till too late in the process...

Please strengthen the Parking requirement in the Initial Study; do not remove it. The suggestion to postpone parking consideration till after permission for development are given is simply one more sneaky way to guarantee failure to protect the environment. If an agency must address adverse environmental impacts from parking at all, they must do it **BEFORE** permissions are given, in the Initial Study Checklist. Institutional and developer's lawyers here are now asking city staff to remove CEQA requirements from as many of our City ordinances as possible, showing how essential State requirements are for environmental protection for the State and for the average citizen.

If citizens are to help the State increase environmentally responsible development on the level, the State must help citizens now to strengthen the Parking standards in the Initial CEQA checklist. Their residential areas and property values must be protected by the Parking, Traffic, and Transportation section as the population burgeons, or they won't or can't help the State.

C.R. & Barbara Fowler