

## Lockey, Heather@CNRA

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**From:** Heather Adamson <hadamson@ambag.org>  
**Sent:** Tuesday, March 6, 2018 11:05 AM  
**To:** CEQA Guidelines@CNRA; Calfee, Christopher@CNRA  
**Cc:** Heather Adamson; Paul Hierling; mtwomey@ambag.org; Chris Ganson (Chris.Ganson@OPR.CA.GOV)  
**Subject:** AMBAG Comment Letter on the Proposed CEQA Guidelines Update  
**Attachments:** AMBAG\_CEQA Update Comment Letter\_030618.pdf

Chris-

Attached is AMBAG's comment letter on the Proposed CEQA Guidelines Update. Please contact Paul Hierling at [phierling@ambag.org](mailto:phierling@ambag.org) or (831) 264-5092 if you have any questions.

Thanks,  
Heather

**Heather Adamson, AICP**  
**Director of Planning**  
**AMBAG**  
**(831) 264-5086**  
[hadamson@ambag.org](mailto:hadamson@ambag.org)



March 6, 2018

Christopher Calfee  
Deputy Secretary and General Counsel  
California Natural Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814

**Subject:       Comments on the Proposed Updates to the CEQA Guidelines of  
November 2017**

Dear Mr. Calfee:

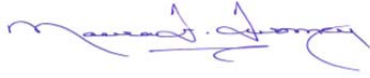
The Association of Monterey Bay Area Governments (AMBAG) is pleased to submit the following comments in response to the Office of Planning and Research's *Proposed Updates to the CEQA Guidelines of November 2017*.

AMBAG is the federally designated Metropolitan Planning Organization (MPO) and Council of Governments (COG) for the Monterey Bay area region. Among its many duties AMBAG manages the region's transportation demand model and prepares the regional Sustainable Communities Strategy for reducing greenhouse gas emissions throughout the region in compliance with California Senate Bill 375. The AMBAG region includes three counties and 18 cities. The following comments are for your consideration:

- In proposed updates to §15182, AMBAG requests that OPR clarify how project proponents become compliant with (b)(1)(A). Specifically, if a project includes funding for planning or implementing a high quality transit hub next to a proposed development, does this make them compliant with (b)(1)(A)? Or must high quality transit be planned or implemented before a project begins in order to be compliant with (b)(1)(A)? Clarification of this point will benefit project proponents, lead agencies and transit agencies in the application of this update.
- In proposed update to §15182(b)(1)(C), AMBAG requests that OPR clarify whether the lead agency needs a letter from their MPO attesting to project consistency with the regional Sustainable Communities Strategy (SCS) or whether the lead agency be able to evaluate consistency with the regional SCS independently. AMBAG recommends that OPR allow lead agencies to determine consistency with the regional SCS independently to avoid undue burden on MPOs.

Thank you the opportunity to provide input on the *Proposed Updates to the CEQA Guidelines of November 2017*. Please feel free to contact Paul Hierling at (831) 264-5092 or via email at [phierling@ambag.org](mailto:phierling@ambag.org) if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Maura F. Twomey". The signature is fluid and cursive, with a prominent initial "M" and a long, sweeping underline.

Maura F. Twomey  
Executive Director