

Lockey, Heather@CNRA

From: Vandrew Rodriguez, Susan <SVandrew@san-marcos.net>
Sent: Thursday, March 15, 2018 5:48 PM
To: 'CEQA.Guidelines@resources.ca.gov'
Subject: FW: City of San Marcos comments
Attachments: OPRNov2017_guidelines_City of San Marcos.pdf

Please use these comments. Thank you.



SUSAN VANDREW RODRIGUEZ | Associate Planner
City of San Marcos | 1 Civic Center Drive, San Marcos CA 92069
T: (760) 744-1050 x3237
svandrew@san-marcos.net | www.san-marcos.net
Discover San Marcos on social media: [Facebook](#) | [Twitter](#) | [Instagram](#) | [LinkedIn](#) | [YouTube](#)

City offices are open Monday - Friday* from 7:30 AM to 5:30 PM
*City offices are closed every other Friday, [click here](#) to view the scheduled closures.

From: Vandrew Rodriguez, Susan
Sent: Thursday, March 15, 2018 5:34 PM
To: 'CEQA.Guidelines@resources.ca.gov'
Subject: City of San Marcos comments

Please verify receipt of comments. Thank you.



SUSAN VANDREW RODRIGUEZ | Associate Planner
City of San Marcos | 1 Civic Center Drive, San Marcos CA 92069
T: (760) 744-1050 x3237
svandrew@san-marcos.net | www.san-marcos.net
Discover San Marcos on social media: [Facebook](#) | [Twitter](#) | [Instagram](#) | [LinkedIn](#) | [YouTube](#)

City offices are open Monday - Friday* from 7:30 AM to 5:30 PM
*City offices are closed every other Friday, [click here](#) to view the scheduled closures.



March 15, 2018

Sent Via E-Mail

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

Re: November 2017 Proposed Updates to CEQA Guidelines

Dear Mr. Calfee:

The City of San Marcos (City) thanks you for the opportunity to provide comments regarding the "Proposed Updates to CEQA Guidelines" (Guidelines) document dated November 2017 prepared by the Governor's Office of Planning and Research (OPR). This letter specifically responds to the addition of the Energy and Wildfire Sections, and the change to the Transportation Section of Appendix G.

With regard to Energy, will OPR be providing guidance to assist lead agencies in threshold development to address the question of what is considered wasteful, inefficient, or unnecessary consumption of energy? As to the Wildfire category, the City is concerned that question XX. b), which asks about wildfire exposure to project occupants, is contrary to the historical CEQA analysis methodology that focuses on project impacts to the surrounding environmental condition.

The Transportation Section replacement of LOS with VMT for impact assessment is problematic for local Cities, where impacts relative to a regional average for land use, i.e. Countywide VMT average for use in identifying the 85th% threshold, may be a poor representative of the City, and a better threshold could be used using 85% of Citywide average VMT/capita (or employee). With this in mind, in development of VMT impact assessment, the City requests direction from OPR as to flexibility in the guidelines to allow the use of a citywide average for land use in the VMT impact methodology.

The City requests notification of any changes to the Guidelines that may result from public comment prior to final rulemaking process approval. Please feel free to contact me at (760) 744-1050 extension 3237 or svandrew@san-marcos.net regarding this comment letter.

Best regards,

Susan Vandrew Rodriguez
Associate Planner

cc: Karen Brindley, Planning Division Manager
Joe Farace, Principal Planner
Nic Abboud, Principal Civil Engineer (Traffic)