



July 17, 2018

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

RE: CEQA Guideline Revisons (OPPOSE)

Dear Deputy Secretary Christopher Calfee,

On behalf of BizFed, a grassroots alliance of more than 170 business organizations that represent 390,000 employers with over 3.5 million employees in LA County we are celebrating our tenth anniversary with a mission to lift one million people out of poverty in the next decade. One of the many opportunities to lift and prevent poverty in LA County are providing solutions that improve compliance and end litigation abuse of the California Environmental Quality Act (CEQA). We have previously submitted comments to the January 2018 version of proposed amendments to the CEQA Guidelines. We were disappointed that virtually none of our suggested revisions were made, nor were any of our concerns addressed.

BizFed's comments that were submitted on March 2018 fell under four key themes that create the necessary reforms needed to improve compliance with CEQA and streamline the process;

- (1) Prohibit anonymous CEQA lawsuits allowing petitioners to conceal their identities and economic interests;
- (2) Prohibit duplicative CEQA lawsuits allowing parties to repeatedly sue over the same plan, or projects implementing a plan, for which CEQA compliance has already been completed;
- (3) Establish a "mend it, not end it" approach of directing corrections to any deficient environmental study rather than vacating project approvals; and
- (4) Prohibit CEQA lawsuits against voter-approved infrastructure projects, and against projects receiving voter-approved approved funding (e.g., for homeless housing).

New revisions included in the July 2018 version further increase CEQA's compliance costs and litigation risks. For example, our concerns about the addition of a new CEQA impact of driving even an electric car one mile, have increased further given the VMT mitigation workshop presentations that make clear your intention to impose thousands of dollars in new VMT-related mitigation costs, annually in perpetuity, on new housing and employment projects.

This new VMT impact requirement becomes effective in 2020, at which point projects requiring new discretionary agency approvals - even projects that already have development agreements and projects fully consistent with previously-approved EIRs - will be required to undergo a new CEQA process which goes against Principles #2 and 3 even though this new requirement is at no fault of the project applicant. To impose an annual and in perpetuity increase in housing costs, and impose the equivalent of a new employee tax,

- BizFed's Member Alliance
- Action Apartment Association
- AIA - Los Angeles
- Airlines for America
- Alhambra Chamber
- American Beverage Association
- American Hotel & Lodging Association
- Antelope Valley Board of Trade
- Apartment Association, California Southern Cities
- Apartment Association of Greater Los Angeles
- Arcadia Association of Realtors
- Asian American Business Women Association
- Asian Business Association
- Association of Independent Commercial Producers
- Azusa Chamber
- Beverly Hills Chamber
- Beverly Hills / Greater LA Association of Realtors
- BNA/SUCCESS
- Burbank Association of Realtors
- Building Industry Association, LA / Ventura Counties
- Building Owners & Managers Association, Greater LA
- Business & Industry Council for Emergency Planning & Preparedness
- CalAsian Chamber
- California Apartment Association, Los Angeles
- California Asphalt Pavement Association
- California Business Roundtable
- California Cannabis Industry Association
- California Construction Industry and Materials Association
- California Contract Cities Association
- California Employers Association
- California Fashion Association
- California Grocers Association
- California Hotel & Lodging Association
- California Independent Oil Marketers
- California Independent Petroleum Association
- California Life Sciences Association
- California Metals Coalition
- California Restaurant Association
- California Small Business Alliance
- California Sportfishing League
- California Trucking Association
- CALInnovates
- Carson Chamber of Commerce
- Carson Dominguez Employers Alliance
- CDC Small Business Finance
- Central City Association
- Century City Chamber of Commerce
- Cerritos Chamber
- Citrus Valley Association of Realtors
- Construction Industry Air and Water Quality Coalitions
- Consumer Healthcare Products Association
- Council on Trade and Investment for Filipino Americans
- Culver City Chamber
- Downey Association of Realtors
- Downtown Long Beach Alliance
- Downtown Pomona Owners Association
- El Monte/South El Monte Chamber
- Employers Group
- Engineering Contractor's Association
- F.A.S.T. - Fixing Angelesh Stuck In Traffic
- FilmLA
- Foreign Trade Association
- FuturaPorts
- Gateway to LA
- Glendale Association of Realtors
- Glendale Chamber
- Glendora Chamber
- Greater Antelope Valley AOR
- Greater Lakewood Chamber
- Greater Los Angeles African American Chamber
- Greater Los Angeles New Car Dealers Association
- Harbor Association of Industry and Commerce
- Harbor Trucking Association
- Hollywood Chamber
- Hong Kong Trade Development Council
- Hospital Association of Southern California
- Hotel Association of Los Angeles
- Independent Cities Association
- Industry Manufacturers Council
- Inglewood Airport Area Chamber
- International Warehouse Logistics Association
- Inglewood Airport Area Chamber
- Investing in Place
- Irwindale Chamber
- Japan Business Association of Southern California
- LA Canada Flintridge Chamber
- LA Media Lab
- LAX Coastal Area Chamber
- Leadership for Urban Renewal Network
- League of California Cities
- Local Search Association
- Long Beach Area Chamber
- Los Angeles Area Chamber
- Los Angeles Black MBA Association
- Los Angeles CleanTech Institute
- Los Angeles County Bicycle Coalition
- Los Angeles County Board of Real Estate
- Los Angeles County Waste Management Association
- Los Angeles Gateway Chamber of Commerce
- Los Angeles Gay & Lesbian Chamber of Commerce
- Los Angeles Latino Chamber
- Los Angeles Parking Association
- Maple Business Council
- Motion Picture Association of America
- MoveLA
- NAIFA - OC
- NAIOP Southern California Chapter
- National Association of Toy and Gun Owners
- National Association of Tobacco Outlets
- National Association of Women Business Owners
- National Association of Women Business Owners, LA
- National Hispanic Medical Association
- National Latina Business Women's Association
- Netherlands-America Foundation
- Orange County Business Council
- Pacific Merchant Shipping Association
- Pacific Palisades Chamber
- Panorama City Chamber
- Pasadena Chamber
- Pasadena-Foothills Association of Realtors
- PHRMA
- Planned Parenthood Southern California Affiliates
- Pomona Chamber
- Rancho Southeast Association of Realtors
- Recording Industry Association of America
- Regional Black - San Fernando Valley Chamber
- Regional San Gabriel Valley Chamber
- Rosemead Chamber
- Rotary Club of Los Angeles
- San Gabriel Chamber
- San Gabriel Valley Civic Alliance
- San Gabriel Valley Economic Partnership
- Santa Clarita Valley Chamber
- Santa Clarita Valley Economic Development Corp.
- San Pedro Peninsula Chamber
- Santa Monica Chamber
- Santa Monica Junior Chamber
- SCALE LA
- Sherman Oaks Chamber of Commerce
- South Bay Association of Chambers
- South Bay Association of Realtors
- Southern California Contractors Association
- Southern California Golf Association
- Southern California Grantmakers
- Southern California Minority Supplier Development Council Inc.
- Southern California Water Committee
- Southland Regional Association of Realtors
- Torrance Area Chamber
- Town Hall Los Angeles
- Tri-Counties Association of Realtors
- United Chambers San Fernando Valley
- United States-Mexico Chamber
- Unmanned Autonomous Vehicle Systems Association
- Valley Economic Alliance
- Valley Economic Development Corp.
- Valley Industry & Commerce Association
- Vernon Chamber
- Vietnamese American Chamber
- Warner Center Association
- West Hollywood Chamber
- West Los Angeles Chamber
- West San Gabriel Valley Association
- West Valley/Warner Center Chamber
- Western Manufactured Housing Association
- Western States Petroleum Association
- Westside Council of Chambers
- Westwood Village Rotary Club
- Wilmington Chamber
- World Trade Center
- Young Professionals in Energy - LA Chapter

without Legislative or judicial authorization is unlawful. It is also a shockingly regressive new government mandate on those already suffering from the housing crisis and creates a major new economic disincentive for new jobs.

We also object to other new changes, including for example a new applicant ownership disclosure mandate that is vague, impracticable, and appears aimed at affirmatively encouraging expanded use of CEQA to advance economic rather than environmental objectives. We hereby restate in full our prior comments and objections to these CEQA Guideline revisions, urge that you revise these Guidelines to address our earlier concerns, and reserve all rights to seek judicial as well as other remedies if these Guideline revisions are approved.

Sincerely,



Hilary Norton
BizFed Chair
Fixing Angelenos
Stuck in Traffic (FAST)



David Fleming
BizFed Founding Chair



Tracy Hernandez
BizFed Founding CEO
Impower, Inc.