

From: Rachel Kwok
To: CEQA.Guidelines@CNRA
Subject: CEQA Guidelines Changes
Date: Wednesday, July 11, 2018 1:50:34 PM

Hi Mr. Calfee,

We have been reviewing the proposed changes to CEQA Guidelines. In particular, consistent with the Court ruling in CBIA, changes to CEQA are proposed to clarify that the focus of a CEQA analysis is the project's effect on the environment (and not vice versa). For example, the proposed changes include striking out the reference to "*a subdivision astride an active fault*". The Statement of Reasons indicate that the focus is whether the project might cause or risk exacerbating environmental effects by bringing development and people into the area affected.

With this understanding, the City of Santa Monica is questioning if **Section 21155.1(a)(6)(D)** of CEQA (Transit Priority Project exemption) falls within the scope of CEQA. Specifically, this section states the following criteria for the TPP CEQA exemption: the project site is not "*subject to seismic risk as a result to being within a delineated earthquake fault zone... or a seismic hazard zone, unless the applicable general plan or zoning ordinance contains provisions to mitigate the risk of an earthquake fault or seismic hazard zone*".

We would appreciate it if there was additional clarity provided on this matter in the revised CEQA Guidelines. Thank you.

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