



February 24, 2012

Governor's Office of Planning and Research  
c/o Christopher Calfee  
1400 Tenth Street  
Sacramento, CA 95814

**RE: CEQA Guidelines Update**

Dear Chris,

I am writing regarding input to the SB 226 Guidelines and Performance Standards. We commend the work of your office and others involved on developing the proposed additions to the Guidelines for Implementation of the California Environmental Quality Act.

We understand the intent of SB 226 was a more straightforward and less time-consuming environmental approval process for infill development, and we support this goal as well as the successful implementation of SB 375. We also agree that some of the considerations in the current CEQA process are not necessarily applicable to projects in existing developed areas, and we support a different review process for infill projects that meet certain criteria.

We support the proposed eligibility requirements and performance standards; however, in providing a streamlined process and CEQA exemption for infill development projects, we feel there are certain state environmental and public health goals that should be upheld and supported in this process and that exemptions should not be issued without compliance with state goals. As such, projects that receive such an exemption should also be required to meet performance standards that help implement state policies and goals such as AB 32, SB 375, 20% by 2020 water conservation goals, water quality and water use efficiency, stormwater reuse, reducing urban heat island effect, improving public health, and others.

Accordingly, we offer the following suggested additions to the SB 226 Guidelines and Performance Standards Proposed *Appendix M, II. Performance Standards Applying to All Project Types* and the *Proposed New Appendix N (Infill Environmental Checklist Form)*:

- **Heat Island Reduction.** The project shall incorporate heat island reduction measures to the greatest extent feasible, including shade structures, high solar reflectance index (SRI) paving materials, open grid pavement systems, tree canopy, and high reflectance and vegetated roofs.
- **Urban Forestry.** The project shall include the preservation of any heritage or historical tree identified by an applicable local ordinance or policy and existing healthy non-invasive trees to the

greatest extent feasible. The project shall include no unnecessary removal of trees and result in a net increase in tree canopy, including street trees, parking lots, and other open spaces. An International Society of Arboriculture (ISA) Certified Arborist or a California Urban Forests Council (CaUFC) Certified Urban Forester shall determine that the net increase in tree canopy, any removals, and planting details are appropriate.

- **Stormwater Quality and Reuse.** The project shall reduce impervious cover, promote infiltration, and capture and treat the stormwater runoff to the greatest extent feasible using acceptable best management practices (BMPs), such as trees, vegetated roofs, pervious pavement grid pavers, rain gardens, vegetated swales, disconnection of imperviousness, and integrated natural and mechanical treatment systems such as constructed wetlands, vegetated filters, and open channels to treat stormwater runoff.
- **Water Efficiency.** The project shall reduce potable water consumption for irrigation and other purposes to the greatest extent feasible through measures such as drought tolerant plant species, irrigation efficiency, low flush toilets, water efficient appliances, and the use of captured rainwater, recycled wastewater, or water treated and conveyed by a public agency specifically for non-potable uses.
- **Access to Civic and Public Space.** Locate and/or design the project such that a civic, recreational, or passive-use space lies within a 1/4-mile walking distance. This can include a park, square, plaza, community garden, rain garden, playground, nature trail, river parkway, or other public outdoor space.

I would be happy to discuss any of this further with you or answer any questions you may have. Please feel free to contact me at 916-558-1516 or via email at [connie@csgcalifornia.com](mailto:connie@csgcalifornia.com).

Thank you for your efforts in this process and for considering our recommendations.

Sincerely,



Connie Gallippi  
Senior Policy Consultant