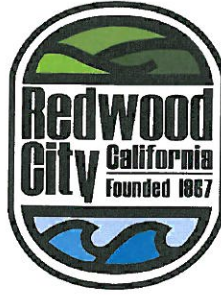


Community Development Department
Planning and Housing Services
1017 Middlefield Road
PO Box 391
Redwood City, CA 94064



Phone (650) 780-7234
Fax (650) 780-0128
TDD (650) 780-0129
www.redwoodcity.org

June 1, 2012

CEQA Guidelines Update
c/o Christopher Calfee
1400 Tenth Street
Sacramento, CA 95814

Subject: Revisions to the Proposed Updates to the CEQA Guidelines Addressing Infill Streamlining (SB226)

Dear Mr. Calfee,

Redwood City is excited about the proposed revisions and is grateful for the continued opportunity to provide comments regarding the Revisions to the Proposed Updates to the CEQA Guidelines Addressing Infill Streamlining, with specific reference to the May 1, 2012 summary letter and associated revisions.

The language of the current proposal is viewed as an improvement over the earlier proposals; however, there is still need for further refinement and clarification in several key areas.

According to Section 15183.3(b)(2) to be eligible for the streamline procedures prescribed in this section, an infill project must, "satisfy the statewide performance standard provided in Appendix M."

Appendix M, Section III Performance Standards Applying to All Project Types states "to be eligible for streamlining... a project must implement all of the following" renewable energy, soil and water remediation, residential units near high-volume roadways and stationary sources.

As future practitioners, the City is interested in seeking clarification on how these performance measures may be applied to projects within our jurisdiction. For example, the Renewable Energy subsection does not present any quantifiable standards. It simply states, "all non-residential projects shall include on-site renewable power generation, such as solar photovoltaic, solar thermal and wind power generation, and clean back-up power supplies, where feasible." To the degree that greater specificity can be provided, we would appreciate the clarity on the following items:

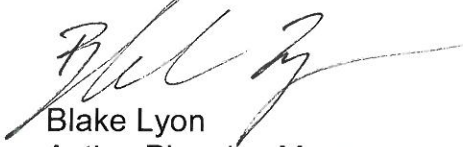
- How much power needs to be generated per building?

- Is there a minimum amount that must be generated, or is there a percentage of the buildings power that needs to be generated?
- Does the “where feasible” apply to all power sources?
- Who determines feasibility?
- Does feasibility extend to just the technical side of the issue or can it be applied monetarily as well?
- What standards are applicable in a mixed use building?
- If a building is converted from or to a non-residential project, which standards apply?

The City of Redwood City looks forward to participating in any further discussion regarding this matter. We believe it critical that the CEQA Guidelines be updated to further promote the opportunity for streamlined infill development.

Please feel free to contact me should you have any questions or wish to discuss the matter further.

Sincerely,

A handwritten signature in black ink, appearing to read 'Blake Lyon', with a long horizontal flourish extending to the right.

Blake Lyon
Acting Planning Manager
650-780-5934
blyon@redwoodcity.org