

From: Mike Laird, Deputy Director of Community Services, Tuolumne County Community Resources Agency

Subject: Governor Brown Releases Package of CEQA Reforms--Comments

OPR,

I am a Planner for a rural county. I have reviewed OPR's Section 15183.3 proposed to be added to the State CEQA Guidelines to streamline environmental review of infill projects. I understand that OPR must comply with the requirements of SB 226 in drafting its proposal. The proposal may provide some relief primarily in large urban areas from the requirements to prepare full environmental review documents for projects on qualifying infill sites. However, as written the proposal appears to do little for rural counties that do not have MPO's and the various required planning documents. It appears that the efforts to streamline environmental review of infill projects was caught up in political agendas as SB 226 made its way to the Governor's desk.

A very simple fix to the State CEQA Guidelines that would appear to greatly assist rural counties would be to reword Section 15332(b) of the State CEQA Guidelines to read as follows:

The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

Extending this exemption to apply to unincorporated areas as well as cities would greatly assist county planning agencies with streamlining review of infill projects. Pursuant to Section 15332, the site must be no larger than five acres, urban services must be available, the project could not result in significant impacts to specified resources and the project must be consistent with the General Plan and zoning. Unincorporated portions of counties contain urban areas as well as cities. The type of jurisdiction should not matter as long as the criteria are met.

Thank you for the opportunity to comment on proposed Section 15183.3.

Respectfully,

Mike Laird, AICP

Deputy Director of Community Services

Tuolumne County Community Resources Agency