



May 30, 2012

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

Re: Draft 2 Proposed CEQA Streamlining for Infill Projects (SB 226)

Dear Mr. Calfee:

For over 50 years, Greenbelt Alliance has been the San Francisco Bay Area's advocate for open spaces and vibrant places. We appreciate the opportunity to comment on the second draft of the proposed guidelines for implementation of Senate Bill 226. This letter outlines our major areas of support and suggestions for improvements with regard to the draft guidelines.

Overall, we commend OPR for the process used to develop these guidelines. There was significant opportunity for stakeholder input, and the format in which OPR reflected back stakeholder input on the first draft and provided both the agency's response and the rationale for that response facilitated a high quality policy dialogue.

We appreciate many of the changes that were incorporated into the second draft of the guidelines. In particular, we commend OPR for maintaining and strengthening the focus on regional context including location, Vehicle Miles Traveled (VMT), and density – as the right framework for determining eligibility. We are very pleased to see that the new draft removes CalGreen from the guidelines as an eligibility criterion and relies exclusively on regional context and VMT. We strongly support the change to only allow streamlining in high-VMT areas within a half-mile of a major transit stop or high-quality transit corridor. We appreciate the helpful clarification of the requirement that a parcel be “surrounded at least 75% by qualified urban uses” mean *existing* urban uses. And we support reducing the square footage for eligible commercial projects to 50,000 square feet.

There are still a few ways the guidelines can and should be modified to ensure they maximize sustainable infill development. In general, it is important to recognize the relationship between VMT and household income and to develop policies that maximize VMT reduction (and minimize VMT increase) related to low-income housing. More specifically, much research has been done to show that low-income households have higher transit usage and lower VMT than high-income households.

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As such, one way that CEQA can achieve its goal of minimizing environmental impacts is to ensure that low-income households continue to have access to transit-rich areas. This entails both ensuring that low-income households who currently live in transit-rich areas are not involuntarily displaced when new investment occurs and rewarding the creation of new affordable housing in transit-rich areas. Public Advocates and others have suggested very specific mechanisms that OPR can use to achieve those outcomes; we urge OPR to include such mechanisms both in the SB 226 guidelines and in future agency work to update CEQA guidelines.

Finally, we again urge OPR to limit reliance on past EIRs to no more than 10 years following certification to ensure that current conditions are taken into account to maximize sustainability outcomes.

Thank you for the opportunity to participate in this process.

Sincerely,

A handwritten signature in cursive script that reads "Stephanie Reyes". The ink is dark and the signature is fluid and legible.

Stephanie Reyes, Policy Director