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Transmit through e-mail to [CEQA.Guidelines@ceres.ca.gov](mailto:CEQA.Guidelines@ceres.ca.gov) per instruction

May 31, 2012

OPR CEQA Guidelines Update  
c/o Christopher Calfee  
Senior Counsel, Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

Dear Mr. Calfee,

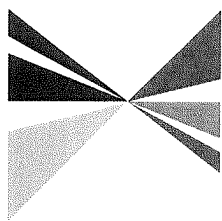
RE: Proposed Updates to the CEQA Guidelines Addressing Infill Streamlining (SB 226)

Thank you for the opportunity to comment on the Proposed Updates of CEQA Guidelines to implement SB 226 to streamline infill development. Infill development plays a critical role to accommodate the projected additional four million residents by 2035 to Southern California, addressed in the 2012 – 2035 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) adopted by the Southern California Association of Governments (SCAG) in April 2012. Specifically, facilitating infill development will support transit use, increase water and energy efficiency, reduce greenhouse gas emissions, and benefit public health in the SCAG region.

On the Proposed Guidelines Updates, we would like to first acknowledge our appreciation of OPR staff in its outreach efforts and seeking input from stakeholders almost as soon as SB 226 was signed into law last October. In addition, we also appreciate the efforts to make use of relevant research findings as the basis for updating the Guidelines. Finally, we support the principles of multiple paths provided in the Guidelines encouraging projects to generate sufficient environmental benefits to qualify for CEQA streamlining.

SCAG also acknowledges the significant improvements made from the preliminary draft released in January to the current revised draft. The following comments are suggested to further enhance the current proposed guidelines.

- First, it would be desirable to use consistent definitions between SB 226 Guidelines and SB 375 when applicable such as “Major Transit Stop”, “High Quality Transit Corridor”, and “Within ½ mile of Major Transit Stop or High Quality Transit Corridor”. Specifically, in reference to residential projects located within one-half-miles of an existing major transit stop or high quality transit corridor, we suggest to refine the current SB 226 Guideline definition by incorporating the following language from SB 375:



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“A project shall be considered to be within one-half mile of a major transit stop or high-quality transit corridor if all parcels within the project have no more than 25 percent of their area farther than one-half mile from the stop or corridor and if not more than 10 percent of the residential units or 100 units, whichever is less, in the project are farther than one-half mile from the stop or corridor.”

- Second, the 2012 RTP/SCS for the SCAG region includes major expansion of the rail transit system and bus rapid transit. In addition to the existing qualified stops, we would suggest that a “Major Transit Stop” should be considered available for addressing infill streamlining if it is included in the adopted RTP and the Federal Transportation Improvement Program (FTIP).
- Finally, on the definition of “Low Vehicle Travel Area” for residential projects, currently the proposed guideline reads:

“Low vehicle travel area” means a traffic analysis zone that exhibits a below average existing level of vehicle travel as determined using a regional travel demand model. For residential projects, travel refers to either home-based or household vehicle miles traveled.

We suggest to refine the definition by specify the use of vehicle miles traveled (VMT) on a per capita basis as the metric to measure the level of vehicle travel.

We look forward to the additional comment opportunities during the rule-making process later this year. Should you have any questions, please feel free to contact my staff Huasha Liu, Director of Land Use and Environmental Planning at 213-236-1838 or Ping Chang, Program Manager at 213-236-1839. Thank you.

Sincerely,

Hasan Ikhrata  
Executive Director

HI:pc