



CITY OF LONG BEACH

DEPARTMENT OF DEVELOPMENT SERVICES

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February 24, 2012

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

RE: Comments on proposed revisions to the California Environmental Quality Act (CEQA) Guidelines pursuant to SB 226

Dear Mr. Calfee:

The City of Long Beach appreciates this opportunity to provide comments on the proposed CEQA Guidelines revisions intended to implement SB 226. Our specific comments on the proposed CEQA Guidelines Section 15183.3, Streamlining for Infill Projects, are as follows:

- In order to know the applicability of the Vehicle Miles Traveled (VMT) per capita provision, the Metropolitan Planning Organizations (MPOs), the Southern California Association of Governments (SCAG) in our region, must develop these calculations. As stated in the proposed CEQA Guidelines, areas where anticipated VMT/capita is 75 percent of the regional average qualify for infill streamlining. This analysis will likely be calculated on the Regional Transportation Plan (RTP) model by Transportation Analysis Zone (TAZ). The background report prepared for the regional SCS indicates a Standard VMT per capita of 13,914 VMT in the current trend. How the regional average might differ from that estimate has not been determined as yet.
- For projects exceeding 100 percent of regional VMT/capita, CalGreen Tier 2 would be appropriate per the proposed guidelines. This could conceivably make a LEED-certified Platinum or similar building located in a remote location qualified for infill streamlining. This seems counter to the intent of the regulation.
- In addition to VMT/capita calculations for TAZs, the Performance Standards in the proposed Appendix M stipulate that residential projects near high-volume roadways may qualify for infill streamlining. While this is an appropriate approach, the proposed volume criteria are too high to be effective. For instance, as proposed, urban roadways would have to have average daily traffic volumes (ADTs) of 100,000 vehicles per day. In Long Beach, a number of highly congested roadways average between 25,000 and 50,000 ADTs. We would suggest that a daily roadway volume over approximately 25,000 ADT with posted speed limits of 35 miles per hour or more would be more appropriate. Additional factors, such as location adjacent to a regionally designated Congestion Management Program (CMP) route, might also be appropriate.

- The proximity to households criteria requires a pedestrian network calculation. While many cities have GIS capabilities that could generate this calculation, most municipal land use regulations are based upon a dwelling unit per acre standard. We would suggest that a moderate multiple-family criteria of, say a minimum of 18-25 dwelling units per acre, be used in place of the 1,200 household calculation. This would simplify the guidelines and be more consistent with commonly implemented planning practices.
- The transportation study called for in the Transit Proximity and Low Parking criteria, “demonstrates that the project would reduce total existing VMT.” This needs to be clarified as to what existing VMT is being considered. The guidelines should clearly state whether future VMT calculation is compared to the existing VMT of current uses on-site, or the VMT that could be generated if the project were built to the most intense level allowed by the current zone, or the greater of either, if appropriate.
- Criteria for transit stations imply that only stations are suitable for infill streamlining. However, we would like to suggest that high-frequency transit corridors, for example Metro’s 15-minute regional transit map, should also qualify as infill streamlining criteria.
- Lastly, many communities have existing zoning and plans for transit-oriented development meant to encourage “smart growth” development, predating SB 375 and other State provisions. In Long Beach, the PD-29 (Long Beach Boulevard) and PD-30 (Downtown) regulations are such examples. These land use regulations may have been in place for a number of years, and may not have current CEQA documents or studies from which tiering under CEQA could be considered, but are consistent with the intent of the guidelines. The intent of the guidelines is to encourage infill development in urban areas well-served by transit at appropriate urban densities. Therefore, areas with this type of existing land use regulation, regardless of implementation date, should qualify for infill streamlining under the proposed regulation, subject to the development and siting criteria described above and in the narrative explanation.

During our review of the proposed guidelines, City of Long Beach staff consulted with both Christopher Calfee, Senior Counsel, and Chris Ganson, Senior Planner, from OPR. We would like to acknowledge their helpfulness and availability in our review.

We appreciate the opportunity to provide comments on this draft document, and look forward to reviewing the revised draft guidelines on this important CEQA reform legislation.

Sincerely,



Amy J. Bodek, AICP
Director of Development Services