



SAN LUIS OBISPO COUNTY

DEPARTMENT OF PLANNING AND BUILDING

Promoting the wise use of land - Helping to build great communities

February 17, 2012

The Governor's Office of Planning and Research
CEQA Guidelines Update
c/o Christopher Calfee
1400 Tenth Street
Sacramento, CA 95815

SUBJECT: CEQA Streamlining for Infill Projects (SB 226)

Dear Mr. Ken Alex:

Thank you for the opportunity to comment on the proposed revisions to the State CEQA Guidelines. The Department appreciates efforts to streamline the CEQA process for infill development and SB 226 is an incremental step in the right direction. Unfortunately, SB 226 is not available for use by the County of San Luis Obispo, even though the County has policies that support increasing infill development in urban communities and encourage reinvestment in our urban areas.

The County of San Luis Obispo's jurisdiction includes ten urban communities, fourteen village areas and all rural unincorporated areas of San Luis Obispo County. Nearly 60% of the County's unincorporated population--about 61,000 people--live within the County's urban communities and within established urban reserve lines. The ten urban communities provide urban-level services and most have areas that are zoned for densities of 15 dwelling units per acre or greater. Our adopted County General Plan supports strategic growth principles, policies, and implementation strategies that forward the goals of the sustainable communities strategy, including increasing urban infill within established urban reserve lines. Furthermore, our Board of Supervisors has directed staff to undertake several planning initiatives to encourage infill development in our communities.

Despite the urban nature of some of our communities, regional efforts to develop a sustainable communities strategy, and the existence of urban policies in our General Plan and Land Use Ordinance, our County is precluded from using the Proposed State CEQA Guidelines Section 15183.3, since none of our urban communities meet the definition of "urban area" as defined in Public Resources Code Section 21094.5(e)(5). Should an opportunity to reexamine the CEQA Infill Exemption's applicability to unincorporated urban communities arise, the Department is willing and available to discuss this issue further.

Sincerely,

JASON H. GIFFEN, Director
Department of Planning and Building