

May 31, 2012

CEQA Guidelines Update  
c/o Christopher Calfee  
1400 Tenth Street  
Sacramento, CA 95815

**RE: CEQA Streamlining for Infill Projects (SB 226)**

Dear Mr. Calfee,

The Sacramento Metropolitan Air Quality Management District (SMAQMD or District) is required to “represent the citizens of the Sacramento district in influencing the decisions of other public and private agencies whose actions may have an adverse impact on air quality.”<sup>1</sup> Accordingly, the District reviewed the proposed CEQA guidelines and has the following comments.

Pedestrian Network Miles

The original proposed guidelines contained the metric “pedestrian network miles” which the District believes to be a worthwhile metric that appropriately reflects on-the-ground realities of planning and development. A local example is Curtis Park Village, a development located in Sacramento east of the City College Light Rail Station. As the crow flies, this project is close to the light rail station, but freight railroad tracks block access to this link. However, the project includes a pedestrian overcrossing connecting Curtis Park Village and the surrounding neighborhood to the light rail station. This addition is recognized and rewarded with the pedestrian network miles metric but ignored with a standard radius metric. While some commenters state that the value is difficult to discover or implement, there are several web-based mapping programs that can calculate the distances a pedestrian would walk between two points. The District recommends that the authors maintain the pedestrian network miles metric.

The SMAQMD thanks the Governor’s Office of Planning and Research for the opportunity to comment on this project. Questions regarding these comments may be directed me at [pphilley@airquality.org](mailto:pphilley@airquality.org) or 916-874-4882.

Sincerely,



Paul Philley, AICP  
Associate Air Quality Planner/Analyst  
Sacramento Metropolitan Air Quality Management District

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<sup>1</sup> Health & Saf. Code, 40961.