



California Infill Builders Federation

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February 21, 2014

Christopher Calfee, Senior Counsel
Governor's Office of Planning & Research
1400 Tenth Street
Sacramento, CA 95814

RE: Topics to be Addressed in 2014 CEQA Guidelines Update, Including Preliminary Evaluation of Alternative Methods of Transportation Analysis

Dear Mr. Calfee:

Thank you for this opportunity to comment on the possible topics to be addressed in the planned 2014 Update to the CEQA Guidelines, both generally and in relation to potential methods of evaluating alternative methods of transportation analysis.

The California Infill Builders Federation (CIBF) represents builders and developers of new homes, offices, schools and retail space in California's urban areas.

As you know, SB 743 eliminates a well-intentioned, but antiquated standard under CEQA that determines traffic significance based on a "level of service" standard. As the state implements our GHG goals, the specific SB 375 goal of attracting new development from greenfields to urban infill areas, a "congestion-based" metric could obviously disadvantage the very high-density development that contributes to GHG reduction and encourages public transit and walkable/bikeable communities. Additionally, the bill expands the existing project exemption in a specific plan to commercial and mixed-use development with access to transit. This expansion encourages development of retail and jobs to support transit and urban infill living.

We appreciate the scope of topics being addressed by OPR. CIBF has a particular interest in clarifying and simplifying reforms from SB 743 designed to incentivize infill. We would request that OPR consider adopting a new Guideline and clarifying existing Appendix G, to make clear that for qualified infill projects in qualified infill locations (as defined in SB 743), there can be no findings of significant adverse CEQA impacts for aesthetics, parking or traffic delay.

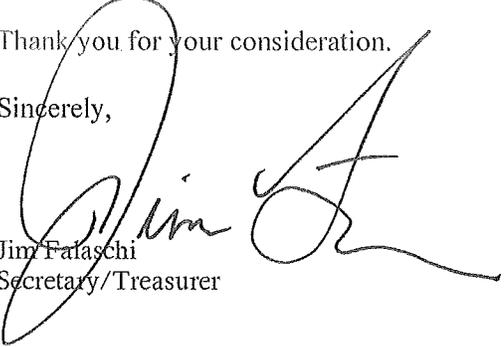
We also appreciate the OPR proposal to study Vehicle Miles Traveled (VMT) as a potential new CEQA metric. For infill, consistent with SB 743, we would ask that the Guidelines make clear that infill projects inherently have low VMT and a VMT analysis should not be required.

Thank you again for your Preliminary Evaluation document, for the thoughtful approach, and for giving stakeholders an opportunity to provide input so early in the Guidelines process. We very much appreciate the open and transparent process.

If you have any questions, please contact our lobbyist, Erin Niemela, at 916-202-4260.

Thank you for your consideration.

Sincerely,


Jim Falaschi
Secretary/Treasurer