

COUNTY OF SANTA BARBARA



Mona Miyasato
County Executive Officer

105 East Anapamu Street, Room 406
Santa Barbara, California 93101
805-568-3400 • Fax 805-568-3414
www.countyofsb.org

Executive Office

October 12, 2015

Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 05814
E-Mail: CEQA.Guidelines@resources.ca.gov

Re: Preliminary Discussion Draft – Proposed Updates to the CEQA Guidelines

Mr. Calfee,

Thank you for the opportunity to comment on the Preliminary Discussion Draft for the Proposed Updates to the CEQA Guidelines. At this time, the County is submitting the attached letter from the Planning and Development Department.

The County has no further comments on this project at this time and looks forward to hearing more about the project's progress. If you should have any further questions, please do not hesitate to contact my office directly, or Matt Schneider, Deputy Director in the Office of Long Range Planning at (805) 568-2072.

Sincerely,

Mona Miyasato
County Executive Officer

cc: Glenn Russell, Ph.D., Director, Planning and Development Department
Matt Schneider, Deputy Director, Long Range Planning Division

Attachments: October 12th Letter, Planning and Development Department



County of Santa Barbara Planning and Development

Glenn S. Russell, Ph.D., Director
Dianne Black, Assistant Director

October 12, 2015

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

E-Mail: CEQA.Guidelines@resources.ca.gov

RE: Comments on the Preliminary Discussion Draft of the Proposed Updates to the CEQA Guidelines

Dear Mr. Calfee:

Thank you for the opportunity to comment on the Preliminary Discussion Draft of the Proposed Updates to the CEQA Guidelines. Our comments are stated below.

1. Re-grouping issues associated with agriculture, geology and soils, mineral resources, and recreation into a single category (the proposed "Open Space, Managed Resources, and Working Landscapes" lacks specificity. The existing categories more clearly relate to physical environmental factors.
2. The language regarding a project's impact to the level of service on roadways should not be removed from the Initial Study checklist, as this remains a real issue of concern to projects.
3. The proposed amendment regarding the definition of "discretionary" (when referring to discretionary projects) is confusing. The key point raised is that a project should be considered discretionary if "the approval process involved allows the government to shape the project in any way that could respond to any of the concerns...in an EIR". However, only discretionary projects are subject to environmental review.

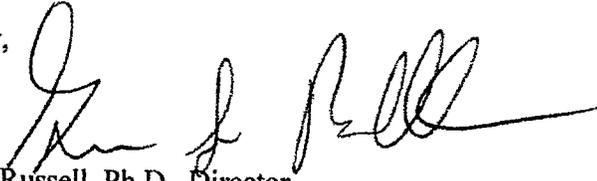
This could be revised to specify that "a project should be considered discretionary if the approval process involved allows the government to shape the project in any way that could respond to environmental concerns".

4. Amending the definition of "mitigation", as it relates to agricultural easements, conflicts with local policies of agricultural land replacement. A 1:1 ratio of agricultural land replacement does not constitute adequate mitigation in the County of Santa Barbara. Several years ago, the County submitted a letter in opposition to a proposed CEQA amendment which would

have allowed agricultural land replacement on a 1:1 ratio as adequate mitigation for farmland conversion.

Please consider these comments when further developing your proposal. If you have any questions or comments regarding this letter, or would like to discuss these issues further, please call Matt Schneider, Deputy Director, Long Range Planning Division, at (805) 568-2072.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn S. Russell". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Glenn S. Russell, Ph.D., Director