



February 24, 2012

CEQA Guidelines Update

c/o Christopher Calfee
1400 Tenth Street
Sacramento, CA 95814

CEQA.Guidelines@ceres.ca.gov.

SUBJECT: Comments on Proposed State CEQA Infill Guidelines, Section 15183.3, Streamlining for Infill Projects

Dear Mr. Calfee:

Thank you for the opportunity to comment on the Proposed State CEQA Infill Guidelines, Section 15183.3, Streamlining for Infill Projects. We appreciate the State Governor's Office of Planning and Research (OPR)'s efforts to streamline CEQA review for infill projects in compliance with SB 226. Our comments follow:

- 1) **Measuring VMT** –As an option to using the MPO's travel demand model, we request the ability for project sponsors to measure average VMT by using countywide travel demand models that are consistent with the MPO's model, subject to approval by the MPO. This provide project sponsors the opportunity to conduct a more detailed analysis of VMT using a model with more focused land use and transportation assumptions in the local area.
- 2) **Review and Revise Guidelines periodically** – We request the OPR review the revised CEQA Guidelines periodically, and update, if necessary, with input from project sponsors, lead agencies and a review of the number of infill projects that successfully use CEQA Guidelines Section 15183.3 to streamline their CEQA review.

Thank you again, for OPR's efforts to streamline the CEQA process to encourage infill development.

Sincerely,

A handwritten signature in black ink that reads "Beth Walukas". The signature is written in a cursive, flowing style.

Beth Walukas
Deputy Director of Planning

Cc: Laurel Poeton, Assistant Transportation Planner
Diane Stark, Senior Transportation Planner

File: CMP – Environmental Review Opinions – Responses - 2012