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County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

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February 24, 2012

CEQA Guidelines Update
c/o Christopher Calfee
Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95815
Email: CEQA.Guidelines@ceres.ca.gov

Comment on SB 226 CEQA Streamlining for Infill Projects

Dear Mr. Calfee:

Thank you for the opportunity to comment on California State Senate Bill 226 (SB 226). SB 226 provides an expedited review process for infill projects that provide environmental benefits. While the County of San Diego (County) supports the premise behind the legislation in that we believe promoting infill development contributes to sustainable future growth, the County is disappointed that SB 226 limits the application of this CEQA exemption to "incorporated cities and dense unincorporated islands." Although we cannot speak for all counties throughout the State of California, it does appear that San Diego County could utilize the infill exemption within our unincorporated villages, thereby advancing the environmental policies stated in SB 226. Consequently, we request the Office of Planning and Research reconsider the eligibility criteria proposed for the CEQA exemption and allow counties the opportunity to take advantage of expedited CEQA review for infill projects.

General Plan Update

On August 3, 2011 the County of San Diego Board of Supervisors adopted the San Diego County General Plan Update (GPU). The GPU contains many Smart Growth Opportunity Areas that are identified in the San Diego Association of Governments Regional Plan. Also, a primary guiding principle of the GPU supports a community development model that features a tight village core with densities up to 30 dwelling units per acre, surrounded by lower density semi-rural and rural lands. This model is based on smart growth principles that concentrate growth in existing communities to further enhance those communities and avoid urban sprawl. In support of this community development model, the GPU land use map and polices are responsible for a more significant shift in future development patterns from rural to urbanized areas than any other county in California. When compared to the former GP, the land use map shifts 20% of the

development potential from rugged, underserved, rural areas to more urbanized areas near infrastructure, services, and employment. Many of the GPU Goals and Policies align with the SB 226 environmental policies. In particular, these include the following:

- *Prioritize infill development:* As stated above, the GPU emphasizes infill by shifting densities from rural areas to within County villages. These villages contain much of the infrastructure and amenities necessary to support higher residential densities and an increase to the intensity of non-residential uses thereby creating more sustainable, self-reliant communities.
- *Reduce vehicle miles traveled:* The GPU focuses growth in existing communities where it will add to and enhance amenities such as jobs and services. As a result, the Plan reduces average daily vehicle trips by approximately 120,000 and daily miles of travel by 3.8 million, when compared to the former General Plan.
- *Reduce greenhouse gas emissions:* The shifted land use development patterns also reduce the need for 780 lane miles of costly and impactive new roads and reduce CO₂ emissions by 550,000 metric tons.
- *Reduce per capita water use:* Goals and Policies of the GPU promote compact mixed-use developments which tend to be associated lowered water use. A critical component of the GPU was the development of a Conservation Subdivision Program requiring compact development and promoting streamlined permit processing.

As can be seen above, the County's recently adopted GPU promotes many of the goals and rationale used by the State to encourage the use of a CEQA exemption for infill project review.

Implementing the GPU

The County of San Diego has already started implementing our GPU Goals and Policies and is engaging our communities in developing land use tools to revitalize existing villages. The County is currently completing a Form Based Code (FBC) for the community of Ramona. The FBC relies upon the newly adopted policies of the GPU with the objectives of increasing residential densities (30 du/acre) within the village area, promoting mixed use development, improving walkability for community residents and reducing the reliance on motor vehicles, and improving the overall economic vitality of the community. Many of the areas within the community are considered infill and are surrounded by existing residential and commercial uses. A similar effort has just started in the unincorporated community of Alpine, California. Utilizing SB 226 would encourage development in the areas where we want to focus growth and would be an important tool for assisting in the County's effort to improve upon the sustainability of our urban villages.

Other Concerns

Another concern is that the eligibility criteria for SB 226, as set forth in Table 3 of the Narrative Explanation, only allows projects located in unincorporated islands that are completely surrounded by incorporated cities. The County of San Diego has many areas that are located adjacent to, but may not completely be surrounded by, an incorporated city which is urban in nature. These areas contain the density and intensity prescribed in the legislation and many of these areas would likely be able to take advantage of the streamlined CEQA process described in SB 226. One particular area with a light rail station, adjacent to the City of Vista, has been assigned land use designations to promote transit oriented development. Although, as we have indicated above, we would prefer to have unincorporated areas to also be eligible for the CEQA

exemption, we would like to request future consideration that the eligibility criteria be revised to include dense unincorporated areas *adjacent* to incorporated cities.

Again, thank you for the opportunity to comment and provide input on SB 226 implementation and additions to the CEQA Guidelines. We encourage OPR to visit the County's GPU website to review the applicable information and maps that substantiate our comments at <http://www.sdcounty.ca.gov/dplu/gpupdate/index.html>. Also, attached are two examples of County lands adjacent to incorporated areas which are virtually undistinguishable in terms of land use pattern, density and intensity of use. Although we understand that OPR is developing tools for the implementation of this legislation, we hope that appropriate steps can be taken in the future to allow counties to utilize the streamlined CEQA process for infill projects within unincorporated urban villages. Should you have questions or need to forward any correspondence, please contact Joseph Farace, Planning Manager at 858-694-3690 or at joseph.farace@sdcounty.ca.gov.

Sincerely,

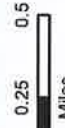
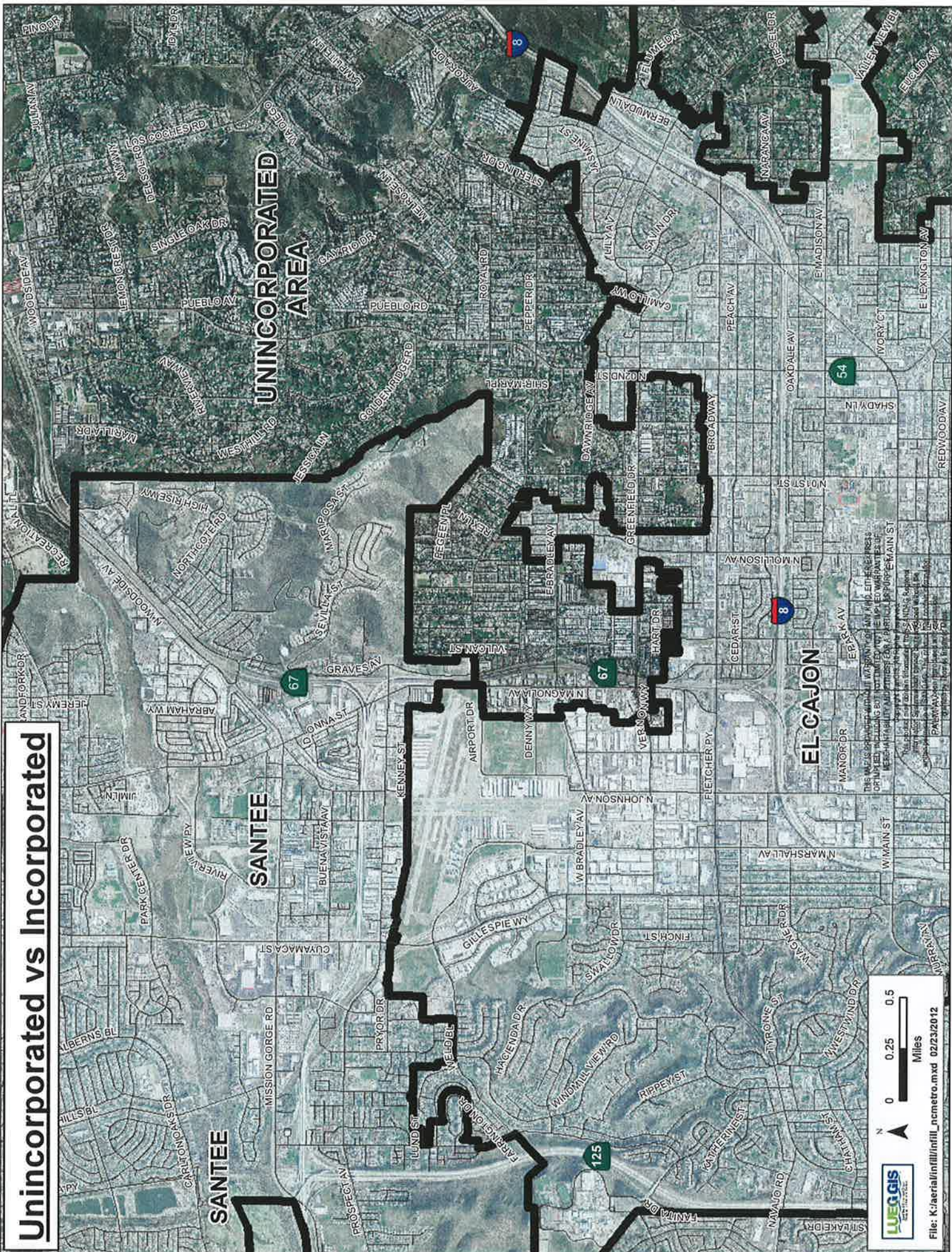


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- Justin Crumley, Deputy County Counsel, Office of County Counsel
- Megan Jones, Land Use Environment Group Program Manager, DCAO
- Thomas Ledford, Legislative Policy Advisor, Strategy and Intergovernmental Affairs
- Joseph Farace, Planning Manager, Department of Planning and Land Use
- Mindy Fogg, Land Use Environmental Planner, Department of Planning and Land Use
- Priscilla Jaszowski, Administrative Secretary, Department of Planning and Land Use

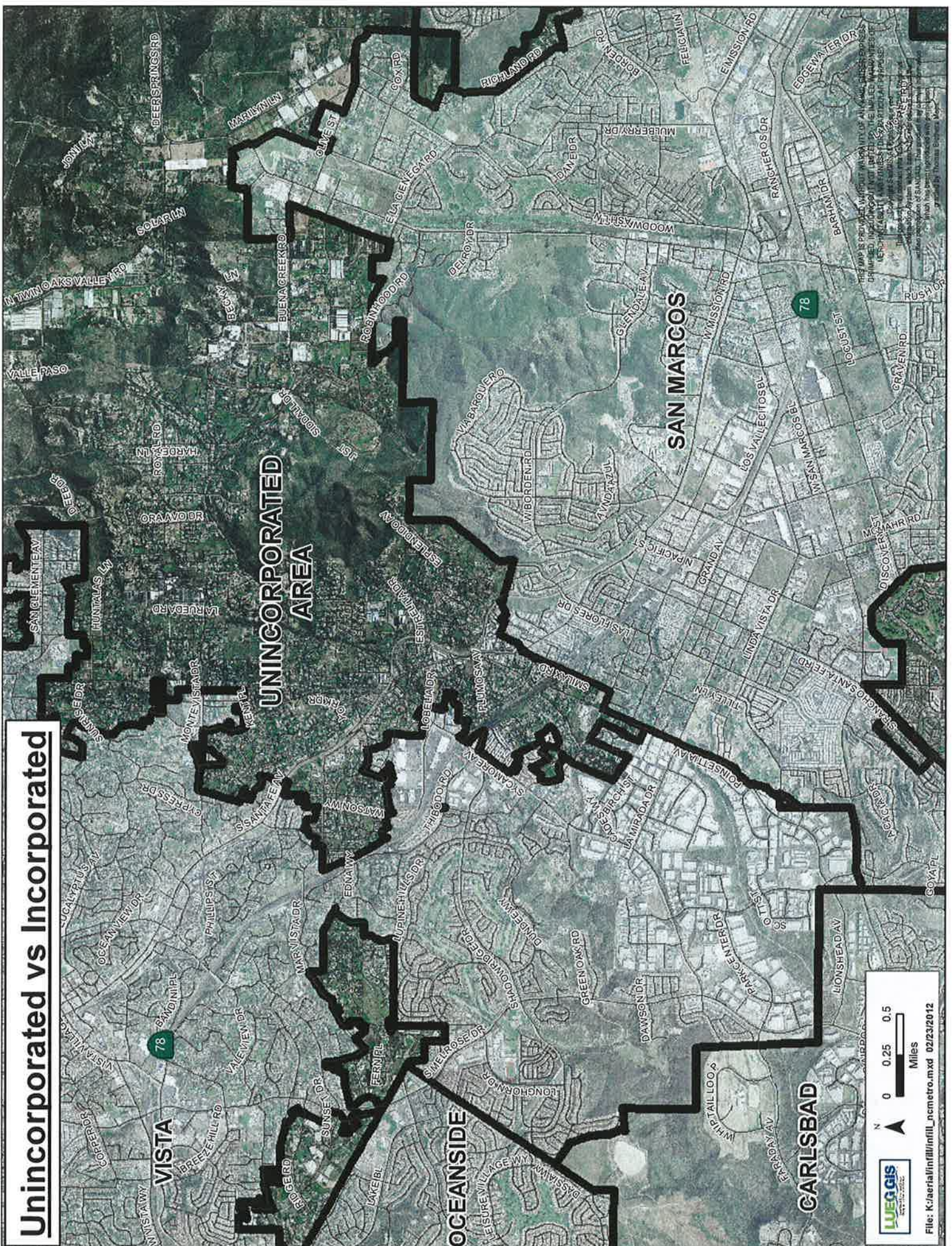
Unincorporated vs Incorporated



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Unincorporated vs Incorporated



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