

From: Jack Eidt, Director, Wild Heritage Planners

Subject: CEQA Guidelines Update

Dear Mr. Calfee:

Wild Heritage Planners commends the State of California for attempting to update CEQA to streamline infill projects that reduce Vehicle Miles Traveled and encourage smart growth and compact, walkable, transit-oriented development. But not all "infill" development projects should be necessarily streamlined.

First, it appears the update would make it too easy for sprawl projects in ex-urban areas to get streamlining. Second, criteria such as affordability and localized air pollution along freeways and major roadways should become primary determinants of acceptable projects.

As currently written, the guidelines would allow projects in "red zones" (areas with the highest VMT - usually remote, semi-rural places) to be eligible for CEQA streamlining if they simply comply with California's green building standards, known as CALGreen. We should not incentivize projects in locales distant from centers of business, population, and alternative transportation that dramatically increase driving, simply because they use green building methods. This is green sprawl and though better than tradition suburban sprawl due to efficiencies and such, does not rectify the addiction to the automobile that sterilizes human environments and causes massive releases of smog and greenhouse gases. The guidelines also make little or no mention of key health and equity issues such as affordable housing and the health risks associated with putting more people near highways and major roadways that have high levels of air pollution. We must encourage growth in our existing cities - AND we must ensure that we're not displacing existing residents or putting new ones at risk.

With some changes, Wild Heritage Planners sees these updates as significant progress toward achieving the goals set out by SB 375 and AB 32 in creating actually sustainable communities.

Sincerely,

Jack Eidt

Director - Wild Heritage Planners