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Mixed Use Development

Additional submitted attachment is included below.

John Hodgson

Subject: Mixed Use Development in Carbon-Constrained Future

I provide the following comments:

- Need to identify site for project. CEC should require that applicants identify a specific site for their proposed project. To do otherwise doesn't make sense. To meet your very aggressive timeline (I would say nearly impossible) being proposed a site will need to be "ready to build" at the start of Phase II. To have an approved site to start construction you have a multiple of steps you need to do. Those steps include 1) identifying and acquiring the site (either by purchase or by option); 2) prepare an entitlement application for submittal to the local jurisdiction (City or County). This will require substantial detail including which entitlements you are seeking (such as a rezone, conditional use permit, etc.), a preliminary design of the project, and other requirements; 3) review of application by City staff including typically planning, public works (sewer, water, drainage, utilities), fire, police, environmental; This step involves receiving comments and revising the application; 4) CEQA review (preparation of an EIR or other environmental document). ; 5) public outreach by City and application (usually one or more meetings in the community to receive their input); 6) modifications to the Draft EIR/preparation and certification of Final EIR; 7) several hearings at the City or County which could include a Zoning Administrator, the Planning Commission and oftentimes the City Council; 8) If you receive final approval there is a minimum 30 day appeal period under CEQA; 9) Oftentimes when the project has any type of controversy there will be multiple hearings. Unfortunately this is quite common in California. While it possible a project could get all this done in one year it is very unlikely. At a minimum the CEC should consider requiring a site be identified and preferably it has accomplished most of the steps I have identified above. If a specific site is not identified at a minimum I would recommend providing credits to an applicant who has met each of the steps identified above to insure the greater likelihood a project has a viable site.
- Site eligibility. Locating a site for a project is difficult. I recommend, as much as possible, you have flexibility in terms of where a project can be located. If a project is close to one of the preferred geographic areas then that proposed site should at least be given partial credit.
- Challenge of meeting all the goals. The proposal identifies a number of laudable goals including encouraging using the latest in zero energy techniques, encouraging mixed use, encouraging more housing - both market rate and affordable, engaging community groups and others. Keep in mind that building a mixed-use development is already very challenging. The more goals (requirements) the project must meet the more challenging it is and the higher likelihood the project will be not be economically viable.
- Scoring criteria. It would be helpful to know how the applications will be evaluated. Will certain goals be more important than others?
- Experience. You need to make sure you have team members who have proven experience in not only energy efficiency but also architecture, development, construction and finance. Having team members who have developed and built successful mixed use projects is critical.
- Prevailing wage. If you can avoid the requirement of prevailing wages you should. Requiring prevailing wage increases building costs by at least 20% or more. That cost makes it very difficult to economically build most types of housing including mixed use.

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