THE CEQA LABYRINTH:

Fixing the Flaws in a Good Law

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I. Introduction

California is the third-largest state by acreage and the most populous. It is in the top 20 in annual population growth. A state with these statistics is sure to see regional differences, both in terms of culture and industry. However, there is one aspect of California life that all residents, north and south, inland and coastal, enjoy: stunning natural beauty.

From Southern California's endless beaches and near-constant sunshine to Northern California's lush forests and picturesque bays, the state's environment is one of its most attractive attributes. As a result, it's no surprise that many efforts have been made to ensure the conservation of that environment.

One such effort, and perhaps the most far-reaching, is the California Environmental Quality Act, or CEQA.

CEQA's origins can be linked to passage of the National Environmental Policy Act (NEPA) of 1969. Many in California felt that NEPA did not go far enough to address specific environmental protection concerns in the state, and a committee was formed to discuss supplemental legislation. The result was CEQA, which was signed into law by Gov. Ronald Reagan in 1970.

One of the most important provisions of CEQA is the requirement of an Environmental Impact Report (EIR) on most new construction projects to analyze the potential environmental effects construction might have on the area.

But, besides giving local authorities valuable information about the potential effect of a project, the EIR also acts as a vehicle to file costly lawsuits for reasons far less noble than environmental stewardship.

Since its passage, CEQA has become the primary tool for environmental concerns around the state to legally challenge development that may do disproportionate harm to surrounding ecosystems. The goal of pro-environment CEQA lawsuits is rarely to halt construction altogether but rather to build in a way that minimizes the human footprint and protects local plants and wildlife. Hundreds of success stories can be traced to the use of CEQA to mitigate a project's effect on the state's natural resources.

CEQA also gives a voice to the public in defending the environment of its communities. CEQA lawsuits are a vehicle for local entities, both public and private, to demand strict environmental review of new construction in their areas. Unrestricted development can harm a local ecosystem as well as increase the risk of environmental damage to much larger natural areas.

However, CEQA has become a favorite target of the state's business community because of the requirement that issues raised in the EIR must be mitigated before development can begin. The law has provided a tool for those seeking to protect our state's ecosystems to ensure that new development does not destroy one of California's most valuable resources.

There is no government entity specifically empowered by the law to enforce CEQA, so litigation in its name is usually filed by private parties. Many of these parties around the state see CEQA lawsuits as an opportunity to hurt competition, advance NIMBYism, and flat out cash in. As a result, there is very little

precedent and accepted protocol for dealing with CEQA litigation, and most cases are generally decided on a one-off basis.

In addition, the delays associated with CEQA lawsuits have become weapons in and of themselves, with many projects being shut down rather than spending the time and money necessary to battle these lawsuits. The effect of this on the ability to address key social and even environmental concerns has become increasingly apparent. CEQA has actually been used not only to block new and innovative environmental projects, but it has also become a key factor in constraining the housing market.[1]

Reforms are needed to encourage growth and address the crippling housing and infrastructure crises our state faces. CEQA must remain a tool for effective environmental protection, but it should be amended to allow for increased transparency and reduced instances of abuse. Rather than attempting to bypass or remove CEQA, it is essential to make the act more predictable, efficient, and reliable so that it will not only serve to benefit the environment but also work to add well-paying jobs and reasonably priced homes for California's beleaguered middle class.

This paper will provide an overview of how CEQA is used, both for its intended purpose and for less benign motives, and provide key recommendations for streamlining the law to reduce abuses.

II. CEQA as a Weapon

By far the most common complaint about CEQA is its frequent use as a hammer to accomplish any number of objectives that have little or nothing to do with protecting the environment. By filing a lawsuit against a construction project under CEQA, litigants can force delays, increase costs, and often even get projects canceled. But who benefits from these lawsuits?

Business Owners

Competition is one of the riskiest aspects of owning a business. As CEQA lawsuits became more common, entrepreneurs found them to be an effective tool to cause delays and increase costs for potential competitors.

CAMPUS RIVALRY

From 2003 to 2008, the University of Southern California and a developer, Urban Partners, fought a costly, lengthy legal battle over a proposed mixed-use project near its Los Angeles campus. A competing developer, Conquest Housing, filed multiple lawsuits under CEQA against the proposal's EIR, specifically targeting the number of proposed parking spaces next to the building. Although the project was ultimately approved, and Conquest's lawsuits dismissed, the legal fees and delays associated with the lawsuits endangered the project when there was no clear environmental threat.[2]

[1] http://www.milkeninstitute.org/publications/view/816
[2] http://articles.latimes.com/2011/nov/14/local/la-me-development-ceqa-20111114

NIMBYists

Much CEQA litigation falls under the category of simple NIMBYism ("Not in my back yard"), in which residents of a neighborhood oppose development for a number of reasons, including the deleterious effects of construction, perceived drops in land value, and other hyper-local concerns. Ironically, these small-picture concerns may ultimately cause more harm to the larger environment by denying infill construction and steering development away from jobs and transit, thus increasing sprawl and encouraging more use of private transportation.

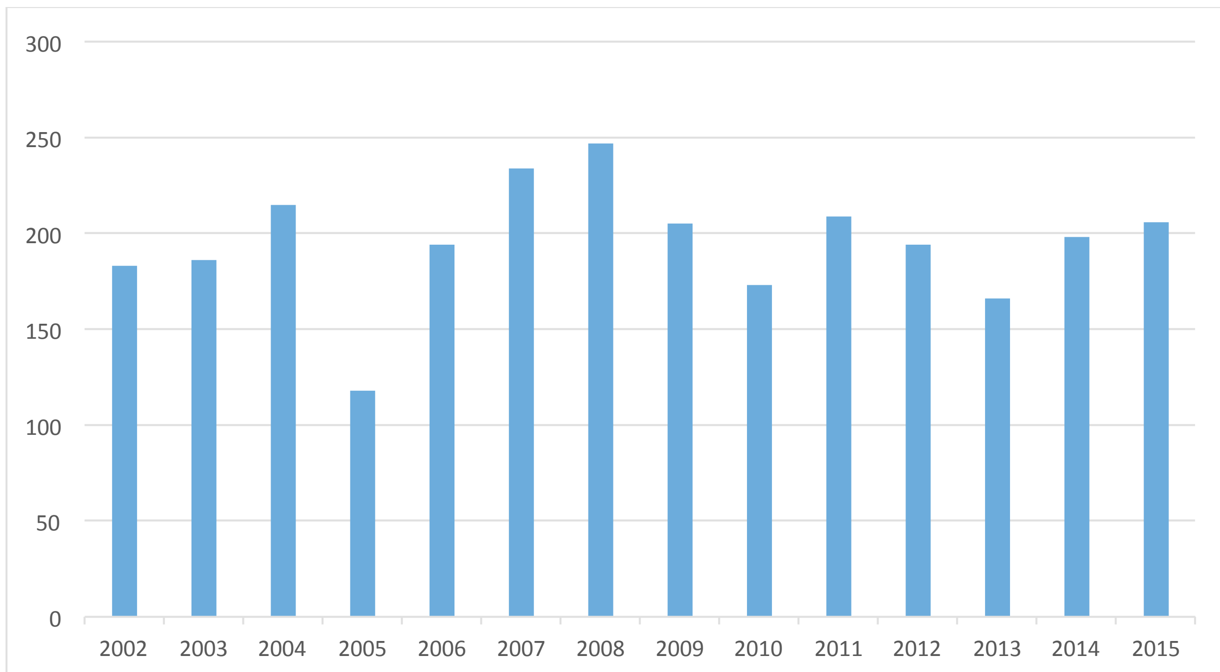
This argument is summarized by Ed Glaeser, economist and professor at Harvard University:

> "I actually do believe that almost all environmentalists are motivated by relatively benign forces and they're trying to do good for the world. … But I do think that in the sales pitch, in the persuasion process, inevitably decision rules get simplified. Inevitably we move things down to sound bites, we move things down to simple implications. And sometimes these just mean that we get results that are less than perfect. In some cases, we can get results that are completely the reverse of what we wanted."[3]

CEQA Lawyers

It is impossible to talk about CEQA battles without discussing the legal teams that fight them. With over 2,700 CEQA lawsuits filed from 2002 to 2015, it is easy to see how the attorneys in these fights are more than happy to see them drag on, particularly the lawyers who bill by the hour.

FIGURE 1. The number of CEQA lawsuits filed, 2002-2015



Source: Rose Foundation

[3] http://freakonomics.com/podcast/why-bad-environmentalism-is-such-an-easy-sell-a-new-freakonomics-radio-podcast-2/

Environmentalists

Environmental groups also commonly oppose CEQA streamlining efforts, though perhaps for less nefarious reasons than business owners, NIMBYists, and lawyers. These organizations see CEQA as their primary tool to reduce harm to the state's environment as a result of new construction.

The environmentalist movement in California does not believe that the case against CEQA has been made by the state's business community. A recent Rose Foundation study concludes that the issue of CEQA litigation abuse is overstated, and the relative stability of the number of CEQA lawsuits filed over a 14-year period (Figure 1), while the state's population has steadily increased, shows that litigation is not proportionally increasing.[4]

There is also concern in the environmental community that any potential "fix" to the problems expressed by the business community risks reducing the effectiveness of the law for those who use CEQA for legitimate environmental concerns. While recognizing the need for policy reforms that address the state's housing crisis — namely, a focus on increasing housing density in urban areas that are close to jobs and public transportation — the answer, in environmentalists' eyes, is an X-Acto knife, not a machete.

As a result of these concerns, environmentalists are generally unconvinced that additional streamlining measures are necessary in the context of the overall good the law does in protecting the state's natural beauty and resources.

Unions

Organized labor is perhaps the most effective and most powerful opponent of CEQA reform. Unions frequently use the threat (or, in some cases, execution) of lawsuits under CEQA to obtain more favorable labor agreements from developers. Unions feel that by forcing favorable agreements on a few projects, rather than agreeing to less-advantageous contracts on several projects or on projects that would exclude union members entirely, they are able to maintain consistent quality work rather than succumb to the wage pressures affecting so many of their compatriots.

RIDING ON UNION CONCESSIONS

One of the more recent examples of unions using CEQA as leverage occurred last year when the International Brotherhood of Electrical Workers (IBEW) sued Kinkisharyo International, a Japanese manufacturer that had recently been awarded a large contract to build trains for Los Angeles County. After multiple lawsuits were filed under the guise of environmental protection, the final agreement, facilitated by Los Angeles Mayor Eric Garcetti, included heavy concessions to the IBEW – including allowing the company's workers to unionize – but did not include any meaningful changes to the project's impact on the local environment.[5]

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[4] http://rosefdn.org/wp-content/uploads/2016/08/CEQA-in-the-21st-Century.pdf

[5] http://www.ocregister.com/articles/ceqa-718161-environmental-unions.html

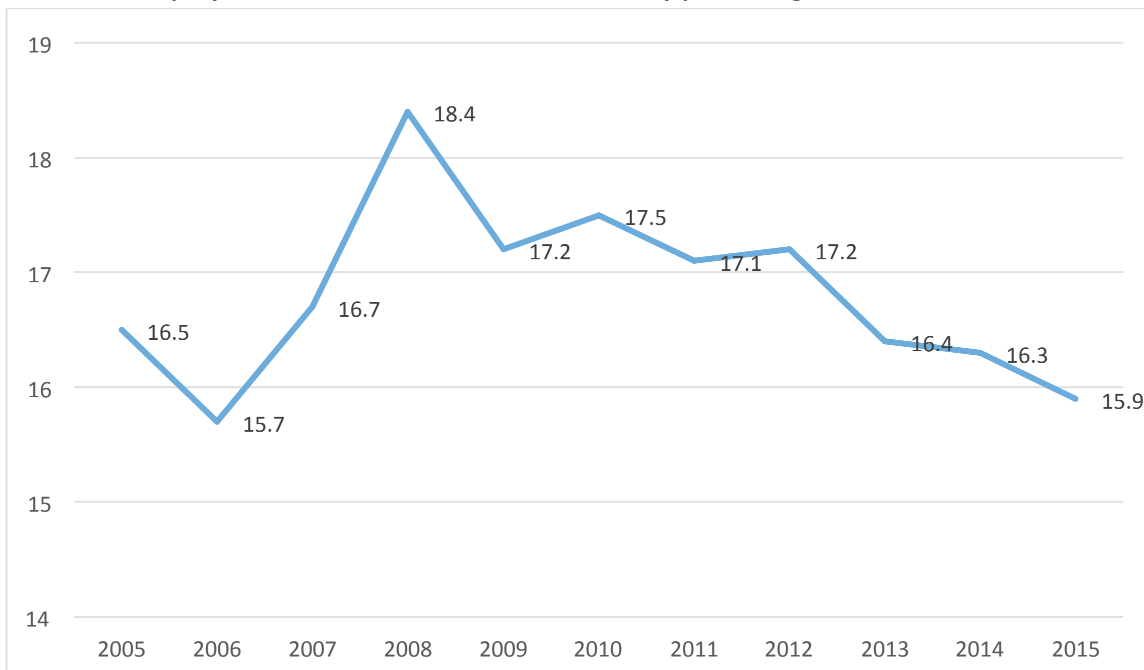
But there are other reasons for union entrenchment on the issue of CEQA reform. Overall union membership in the state has decreased steadily since 2008[6] in the face of an increase in independent contractors, design-build entities that offer one-stop shops for construction projects, and other factors. CEQA helps to maintain unions' impact in state and local politics, and provides an effective means of securing well-paying jobs for members, even as other pressures since the Great Recession have led to a decline in quality housing jobs. In the event of a mass influx of construction projects, unions might not have enough members to adequately guarantee a certain level of organized labor participation in those projects.

As a result, unions commonly oppose reforms that would weaken CEQA, including California Gov. Jerry Brown's most recent by-right proposal that would have bypassed local authority to prevent the development of low-income housing under CEQA.[7]

As detailed later, rather than using CEQA to try to maintain the status quo, there is a potential pathway for union membership and jobs to increase by using CEQA to intelligently advance projects rather than halt them. Even as national union membership remains on the decline, the sheer demand for new housing, new infrastructure, and new commercial buildings could bring actual growth in union membership, if changes were implemented in CEQA effectively.

Combined with smartly planned infill projects, this would have the potential to increase quality of life for numerous union members, as well as for thousands of others who would benefit from such projects.

FIGURE 2. Employed Californians enrolled in unions, by percentage



Source: U.S. Bureau of Labor Statistics

[6] http://www.bls.gov/regions/west/news-release/unionmembership_california.htm#tableA
[7] http://www.latimes.com/politics/la-pol-sac-labor-enviro-housing-20160524-snap-story.html

The Result of CEQA Litigation Abuse

When all these actors use CEQA as a way to get what they want, the result is one big barrier to development in California. When new construction projects see delays or even cancellations as a result of CEQA litigation, the result is less housing, higher costs, and more sprawl, which, ironically, causes more harm to the environment through increased vehicle usage as population centers spread out.

In fact, a recent study conducted by the Holland & Knight law firm that analyzed three years of CEQA lawsuits found that more than three-quarters of all litigation under CEQA over a three-year period was aimed at infill projects – that is, construction in already-populated areas. On top of that, nearly half of the lawsuits targeted government-sponsored projects with no private-sector applicant. These projects included low-cost housing and public works projects.[8] The result was not only reduced access to affordable housing but also increased costs and fees associated with litigating these lawsuits, which ultimately fell to California taxpayers to cover.

With these factors in mind, it is clear that CEQA's effect has reached beyond its intended scope.

III. CEQA as a Savior

While the purpose of this paper is to focus primarily on ways that CEQA processes may be streamlined, we must also acknowledge the positive effect the law has had on California's environment. CEQA is the only law of its kind in the country, and its implementation has undoubtedly protected and preserved countless elements of California's environment.

Policymakers must not mistake reform for replacement. Here we list just two cases in which CEQA was an effective tool to protect the environment. In 2005, the Planning and Conservation League, a nonprofit based in Sacramento, released a report documenting 75 instances in which CEQA played a major role in protecting the state's ecosystems.[9] What lawmakers must do is find the balance between the state's economy and its environment, two aspects of California that are irrevocably intertwined.

CASE 1: The America's Cup

In 2013, preparations were underway in San Francisco to host the America's Cup competition. A major part of those preparations included the renovation of the city's main cruise ship terminal. The project's EIR indicated a major increase in the terminal's air pollution output, primarily based on the need for ships to generate additional power using diesel fuel while the piers were under construction.

Environmental groups, concerned about the increased air pollution, reached an agreement with the project developers that reduced significantly the environmental impact of the project by developing an alternative on-shore power supply nearby. The estimated pollution reduction included 11 tons of reactive organic gases, 215 tons of nitrogen oxides, and 6 tons of particulate matter in 2013 alone.[10]

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[8] https://issuu.com/hollandknight/docs/ceqa_litigation_abuseissuu?e=16627326/14197714
[9] http://www.ecovote.org/imx/ceqa_report.pdf
[10] http://sfmea.sfplanning.org/2010.0493E_DEIR6.pdf

CASE 2: Agriculture in San Diego County

In 1996, a proposal to convert 200,000 acres of San Diego's backcountry to intense agricultural use came before the county's board of supervisors. The proposal received a high amount of criticism from local environmental groups. But, despite the less-than-comprehensive EIR that was submitted, the board approved the measure. CEQA lawsuits initiated by a group called Save Our Forest and Ranchlands eventually attracted the attention of state and national officials by pointing out the EIR's massive deficiencies. Ultimately, multiple revisions to the EIR mandated by the courts resulted in enactment of several environmental protections, including the encouragement of ranch-style farming, limits on agricultural density in the area, and the expansion of the surrounding county water line to reduce the chances of future urban sprawl.[11]

IV. CEQA Exemptions: A Broken Tool

While CEQA is condemned by many as an overly bureaucratic hurdle to development in California, some of the state's largest construction projects have been exempted from the scrutiny that so many other developers have faced. Ironically, it is the projects that are most able to afford financial costs associated with CEQA that are most likely to bypass them. These projects are generally large-scale, one-off projects such as stadiums, government building improvements, and factories.

L.A. RAMS PASSION PROJECT

Rams fans in Southern California are rejoicing at the return of their NFL team. For its first three seasons, the team will play at the iconic Los Angeles Memorial Coliseum while the 70,000-seat City of Champions Stadium is built in Inglewood. Normally, a project of this size would be subject to intense environmental scrutiny, but few things get people more fired up than football. Team and city officials were all too willing to capitalize on that passion, and by announcing a ballot initiative and collecting the necessary signatures for the new stadium project, they were able to trigger a streamlined EIR review process.

In fact, so speedy was the review that approval was gained before a public vote was even necessary, so the measure never actually appeared on any ballot. The reality is that, when it comes to large-scale projects, such as arenas and stadiums, there is a near-unbeatable level of support that usually results in exemptions and additional streamlining from local and state governments.

Legislation bypassing CEQA for certain projects is a common sight on the floor of the state Assembly and Senate. Recent examples include:

- SB 836 – A bill exempting renovations to the California Capitol Complex from extensive CEQA review[12]
- AB 890 – A bill exempting roadway restoration from extensive CEQA review[13]

[11] http://www.sofar.org/gpa9603main.htm
[12] https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB836

- AB 931 – A bill exempting certain infill housing and partial retail properties from CEQA review[14]

V. Recent Attempts at Reform

There have been a number of recent efforts to fine-tune and streamline the law that have met with little success. Here we will examine some of the more high-profile efforts.

By-Right Development

In May 2016, Gov. Brown issued a bold proposal to address the state's housing crisis. Under current law, local jurisdictions have the power to review the environmental impact of affordable housing development projects and approve or deny them. These reviews often result in long delays and, ultimately, opposition to development, with NIMBYism winning the day. Brown is a well-known opponent of CEQA in its current form, even going so far as to say in 2012, "I've never seen a CEQA exemption that I don't like."[15]

In the May budget revision, Brown proposed that these local jurisdictions be stripped of their review powers in areas where affordable housing is needed most. The governor is known for being fiscally conservative, and the move was hailed by many as a way to increase development without appropriating additional funding for housing.

However, based on the complete bypassing of local controls, along with their resultant reduced bargaining position, organized labor strongly opposed the measure, writing in a letter to the Legislature:

> "We understand the need for more housing and other infill development, and support worthy projects. But development "by right" goes too far. By precluding environmental analysis and readily available mitigation measures that can protect local residents, this proposal puts the health and well-being of people at risk, especially children. Simply put, this proposal would be a disaster for the environment, the public and the future residents of these developments."[16]

This level of opposition proved too powerful to overcome, and the proposal, along with its companion legislation, died a quiet death before receiving a vote. So strong was the opposition and so powerful the labor lobby that not a single lawmaker in either party publicly voiced support for the measure.[17] [18] That being said, the position voiced by organized labor in the letter very much does leave open the possibility for a middle path: expediting projects while not completely bypassing the local controls. This middle path is essential for finding effective solutions to the housing shortfall while also ensuring that all parties recognize the benefits of a reduced cost of living for workers and reduced commute times to benefit the environment.

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[13] https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201120120AB890
[14] http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201120120AB931
[15] http://www.sacbee.com/news/politics-government/capitol-alert/article24879877.html
[16] http://advocacy.calchamber.com/wp-content/uploads/2016/08/Gov-Prop-Labor-Env-5-18.pdf
[17] http://www.latimes.com/politics/la-pol-sac-governor-housing-failure-20160912-snap-story.html
[18] http://www.latimes.com/politics/essential/la-pol-sac-essential-politics-updates-low-income-negotiations-are-done-1471561791-htmlstory.html

VI. Recommendations

As this paper demonstrates, CEQA does present a deleterious effect on several aspects of California life, including housing costs and sprawl. These obstacles harm California and its environment through litigation abuse and a disregard for the original intent of the law. No serious movement exists to completely tear CEQA down. Through reform, however, these negative effects can be mitigated.

Unfortunately, the so-called “green/blue alliance” between environmental and labor interests presents a near-unbeatable obstacle to large-scale reform. While those in the environmental lobby are willing to openly discuss their opposition to reform, labor is far less willing to talk. This is almost certainly because a pro-environment argument is more agreeable than the pro-money position held by labor.

Engage Policymakers and Swell Passion for Reform

Most policymakers in Sacramento will agree that CEQA needs fine-tuning, if not large-scale reform. The problem with this position is that any legislator or elected official who says so publicly will immediately incur the wrath of a number of statewide interest groups, particularly those in the green/blue alliance: labor and environmentalists.

Even former governors, who can speak candidly without fear of political reprisal, agree that reforms are needed. In a 2012 op-ed for the San Diego Union-Tribune, former governors George Deukmejian, Pete Wilson, and Gray Davis wrote:

> “There has been a lot of talk about the need to confront CEQA litigation abuse, but unfortunately it’s been mostly talk. Inaction is no longer an option, as there is simply too much at risk for both our economy and our environment. We must tackle this important issue now. By applying reason along with well-established California characteristics of innovation, self-confidence, and environmental and economic leadership, we can indeed modernize CEQA, end frivolous litigation abuse, and restore the necessary balance so that our state can remain both “green” and “golden.” As Californians, anything less is simply not acceptable.”[19]

This has not stopped lawmakers from facilitating one-off streamlining efforts and workarounds, however.

Increase Awareness of Streamlining Options

A number of streamlining provisions already exist within current CEQA legislation that many developers and agencies are simply not aware of. Increasing awareness of these options would be an effective way for project managers to expedite construction within current CEQA guidelines.

For example, provisions in SB 375 (Steinberg, 2008), SB 226 (Simitian, 2011), and AB 32 (2006, Nuñez and Pavley) outline numerous fast-tracking options for qualifying projects. Knowledge of these

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[19] http://www.sandiegouniontribune.com/opinion/commentary/sdut-keep-california-green-and-golden-with-ceqa-reforms-2012jul12-story.html

provisions, however, is dependent on knowing where to find them and being able to understand if and how they apply to a specific project. A website can be developed by government agencies to pose a series of simple questions about a particular project that a developer can answer. Based on the answers to those questions, different possible results could be presented to inform the user of the options for streamlining that exist under CEQA law.

A flowchart was developed by the Governor's Office of Planning and Research (see the link to it in footnotes) to demonstrate the streamlining options implemented by SB 226.[20] An interactive version of this tool could go a long way in making developers aware of streamlining options.

Present Alternatives for Labor to Maintain Leverage

In order to get organized labor on board with any kind of real reform, it must feel as though it is not losing the upper hand in development agreement conversations. As previously mentioned, labor commonly uses CEQA lawsuits – or the threat of CEQA lawsuits – to increase its influence in labor negotiations. It will not give this tool up easily.

Therefore, it is important that labor be presented with alternative methods to maintain its leverage. If and when large-scale CEQA reform occurs, and proposed developments that had previously been halted move forward, labor organizations will be handed hundreds if not thousands of new construction projects all over the state. Even if the ranks of construction unions swelled, these projects would be too numerous to begin all at once. Therefore, the key will be prioritization; labor unions will be able to negotiate with developers to prioritize projects for more immediate construction. This will allow labor to retain a measure of leverage for negotiating more favorable agreements while removing a major barrier to development.

Litigation Transparency

A common tactic for CEQA litigation abuse is to create a nonprofit organization with an environmentally friendly name that is, in fact, simply a front used to file lawsuits against developers. These organizations are currently exempt from financial disclosure requirements that other parties in CEQA litigation, such as those who wish to file amicus briefs, are subject to.[21] By shedding light on the financial backers of organizations that file suit, the validity of the claim can be informed.

VII. Conclusion

Ultimately, most agree that CEQA is a law that does a lot of good but has become too burdensome to infill development in a state that desperately needs it. Most also agree that changes are needed, but for a variety of reasons, including fear of political reprisal, environmental concerns, and outright greed, they are unwilling or unable to make the political moves necessary to enact those changes.

[20] https://www.opr.ca.gov/docs/InfillStreamliningFlowchart.pdf
[21] http://www.courts.ca.gov/cms/rules/index.cfm?title=eight&linkid=rule8_520

Surgical changes may be enacted, including litigation transparency and small streamlining measures, but when it comes down to it, no major reform will ever occur as long as labor and, to a lesser extent, environmental interests dominate the legislative arena. Fear of these lobbies is so great that a very popular governor in a state ruled by his own party was unable to get a single voice of legislative support for a measure to streamline CEQA.

About the Authors

Jason Barrett is a senior public policy analyst at the Milken Institute. He monitors political activity in Sacramento and Washington, D.C., and analyzes its effects on economic, financial, and regulatory policies. Barrett seeks to provide decision-makers and Institute stakeholders with key information regarding relevant legislation and policies at the city, state, and national levels. Recent projects focus on identifying practices that could help California improve competitiveness and attract businesses, such as expanded access to government information through statewide open-data policies.

Previously, Barrett worked for Congressional Quarterly, an organization that analyzes the latest legislative activity in Washington. He also worked in the Capitol Hill office of U.S. Sen. Bill Nelson. Barrett received a bachelor's degree in corporate communications and political science from Elon University and a master's degree in legislative affairs from George Washington University.

Kevin Klowden is the executive director of the Milken Institute's California Center and a managing economist at the Institute. He specializes in the study of demographic and spatial factors (the distribution of resources, business locations, and movement of labor) and how these are influenced by public policy and in turn affect regional economies. His key areas of focus include technology-based development, infrastructure, the global economy, media, and entertainment.

Klowden was the lead author of "Strategies for Expanding California's Exports," which focused on the vital role trade and exports play in the state economy and its underperformance relative to the country over the past decade. He has also written on the role of transportation infrastructure in economic growth and job creation in reports such as "California's Highway Infrastructure: Traffic's Looming Cost" and "Jobs for America: Investments and Policies for Economic Growth and Competitiveness," as well as in publications including the Wall Street Journal.

He has addressed the role of technology-based development in publications such as the "2014 State Technology and Science Index," "North America's High-Tech Economy" and location-specific studies on Arkansas and Arizona. In addition, Klowden was the lead author of several studies on the economics of the entertainment industry, including "A Hollywood Exit: What California Must Do to Remain Competitive in Entertainment — and Keep Jobs," "Fighting Production Flight: Improving California's Filmed Entertainment Tax Credit Program," "Film Flight: Lost Production and Its Economic Impact in California," and "The Writers' Strike of 2007-2008: The Economic Impact of Digital Distribution," each of which analyzes the changing dynamics of the entertainment industry.

Additionally, he coordinated the Milken Institute's two-year Los Angeles Economy Project, seeking public-policy and private-sector solutions to challenges the region faces amid a growing unskilled labor pool.

Klowden is a frequent speaker on state fiscal issues and has served on multiple advisory boards on business growth, economic development, and infrastructure. He holds graduate degrees from the University of Chicago and the London School of Economics.

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About the Milken Institute

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