

**From:** Qureshi, Mohammad, PhD  
**Sent:** Thursday, November 20, 2014 10:10 AM  
**To:** CEQA Guidelines  
**Subject:** comments on SB743 guidelines

On behalf of the County of San Bernardino Department of Public Works, we would like to resubmit our comments from January 31, 2014 on the first set of draft guidelines. While OPR has made changes to the guidelines from that first version, we do not find the changes have addressed our previous concerns in a substantial manner.

These were the comments we submitted previously and we find them to be still relevant.

1. The County of San Bernardino recognizes the desire by OPR for a VMT based MOE to guide decisions about location. However, we have reservations about how such a value will be estimated. While we have national sources of data for trip generation, we are not familiar with sources of data on trip length by land use activity. The OPR guidelines assert that models exist for this estimation. However, we are not familiar with these models and do not know if they will be adequate for the task of estimating VMT on local streets.
2. The County of San Bernardino is concerned about removing the LOS service analyses based on delay since these are an integral part of evaluating the need for roadway improvements. Removing this aspect from CEQA would take away a valuable tool for monitoring the performance of the roadway network. Perhaps a scenario where both VMT and LOS are evaluated would be a more prudent approach and meet both the objectives of air quality and traffic performance.



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and invest can prosper and achieve well-being.*