

County of Santa Clara

Office of the County Executive

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November 21, 2014

Christopher Calfee
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Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814
CEQA.Guidelines@ceres.ca.gov

**Subject: Comments on Preliminary Discussion Draft of Updates to CEQA
Guidelines Implementing Senate Bill 743**

Thank you for the opportunity for the County of Santa Clara to provide input on the Preliminary Discussion Draft to the Governor's Office of Planning and Research. Please find enclosed letters from the Departments of Roads and Airports and Planning and Development that highlight concerns the County of Santa Clara (County) has with the proposed CEQA modifications.

Under the proposed changes within the Preliminary Discussion Draft, Vehicle Miles Travelled (VMT) would be used as a traffic / environmental metric under CEQA to determine if a project would have a significant environmental impact. While the County Administration generally agrees that Vehicle Miles Travelled (VMT) is an important sustainability metric that measures automobile usage, we believe its use as a CEQA threshold would have unintended consequences.

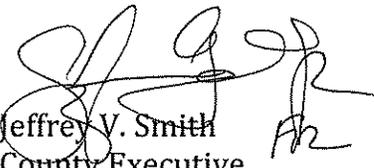
The County of Santa Clara is unique in the state in that we operate a regional expressway system that is heavily used by residents of the 15 cities within the county. As highlighted by our Roads and Airports Department, the replacement of Level of Service (LOS) with VMT may likely severely constrain our ability to manage congestion within this system.

In addition, the vast majority of lands within the county unincorporated areas is located within rural areas that are not designated for future urban growth. The County has maintained strong regional growth management policies within its General Plan for over 30 years that prevent urban sprawl into these areas. As highlighted by our Department of Planning and Development, the use of a VMT as an environmental threshold could have the unintended consequence of undermining these principles by requiring EIRs for rural uses that do not encourage urban sprawl.

In summary, we strongly encourage OPR to pursue an alternative approach to the proposed use of VMT as shown within the Preliminary Discussion Draft.

If you have any further questions, please do not hesitate to contact Rob Eastwood in the Department of Planning and Development at rob.eastwood@pln.sccgov.org and Dawn Cameron in the Department of Roads and Airports at dawn.cameron@rda.sccgov.org.

Sincerely,


Jeffrey V. Smith
County Executive

c: Sylvia Gallegos, Deputy County Executive
Michael Murdter, Dan Collen, Dawn Cameron – Roads and Airports Department
Ignacio Gonzales, Kirk Girard, Rob Eastwood – Planning and Development Department.