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November 20, 2014

Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Re: Opposition to the Office of Planning and Research Senate Bill (SB) 743 Draft Guidelines

Dear Mr. Calfee,

The Orange County Council of Governments (OCCOG) is supportive of public policies that promote sustainable growth, expand economic development, and assist in the reduction of greenhouse gas emissions.

On October 23, 2014 the OCCOG Board of Directors took official action to oppose the Office of Planning and Research (OPR) proposed amendments to Senate Bill (SB) 743. While the initial bill was designed to streamline California Environmental Quality Act (CEQA) guidelines for infill projects, OPR now proposes to expand CEQA by mandating evaluation and mitigation of vehicle miles traveled (VMT) as a new impact and single out many infill projects as the first category of projects that must comply with VMT standards prior to the mandatory compliance for all projects in 2016. This usurps local land use policy and will only lead to additional complexities and litigation associated with the CEQA process.

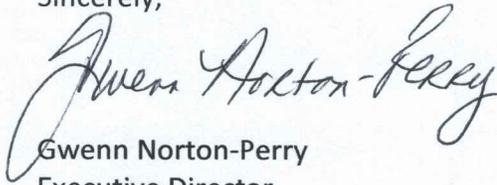
The OPR proposal to expand CEQA imposes additional costs on local projects and creates an unwanted path to new abusive CEQA lawsuits, thus further burdening the limited resources of local governments. OCCOG maintains that this proposal deviates significantly from the State of California's goal to remain a leader in the efforts to support cleaner energy and transportation technologies, new investments in transit systems and progressive policies to reduce greenhouse gas emissions. To successfully address such goals requires CEQA to be more stable and predictable.

In conclusion, OCCOG strongly opposes the SB 743 Guideline Revision Proposal and asserts that the ambiguities within the proposal will only result in costly litigation. OCCOG respectfully requests that the proposal is shelved and that the stakeholders and local governments are consulted and included in developing a practical and streamlined revision of CEQA strategies.

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On behalf of the OCCOG Board of Directors, I thank you, in advance, for your consideration of our comments. Should you have any questions, I can be reached at 909.573.4333 or gwennnortonperry@msn.com.

Sincerely,

A handwritten signature in cursive script that reads "Gwenn Norton-Perry". The signature is written in black ink and is positioned above the printed name.

Gwenn Norton-Perry
Executive Director
Orange County Council of Governments