

November 21, 2014

**SENT VIA E-MAIL**

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

**RE: Updating Transportation Impacts Analysis in the CEQA Guidelines**

Dear Mr. Calfee,

We commend the Office of Planning and Research's (OPR's) proposal for replacing Level of Service (LOS) analysis with vehicle miles traveled (VMT) criteria for environmental review under the California Environmental Quality Act (CEQA). VMT criteria would be more consistent with CEQA's goal of disclosing and evaluating environmental impacts. The LOS criteria tend to measure convenience of automobile travel rather than environmental impacts.

To effectively fulfill their purpose, however, the new guidelines must be practicable and accessible for user agencies. Practicable guidelines would also facilitate evaluation of land use projects in relation to the Sacramento region's Metropolitan Transportation Plan and Sustainable Communities Strategy (MTP/SCS). This in turn supports the District's implementation plans for federal and state air quality requirements, which use MTP/SCS land use assumptions.

To help fulfill these purposes, the District supports the Sacramento Area Council of Governments (SACOG) proposal to lab-test the VMT criteria beside the LOS criteria during the CEQA process, with an opportunity to make guideline changes based on findings. This study would evaluate modeling needs, time frames for CEQA review and mitigation, associated costs, and other potential consequences that can only be determined by trial study. This study could also address Sacramento region jurisdictions' concerns about the guidelines' practicability.

Thank you for your efforts. If you have further questions or require assistance, please contact Molly Wright at [mwright@airquality.org](mailto:mwright@airquality.org) or 916-874-4207.

Sincerely,



Larry Greene, Executive Director / Air Pollution Control Officer  
Sacramento Metropolitan Air Quality Management District