



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON HYDE  
Chief Engineer and General Manager

November 21, 2014

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

Dear Mr. Calfee:

**Comments on Review of a Preliminary Discussion Draft  
of Updates to the CEQA Guidelines Implementing Senate Bill 743**

Thank you for the opportunity to provide input on these proposed changes to the CEQA Guidelines. Our comments follow below.

CEQA was supposed to provide discretion to lead agencies in determining how to analyze projects in their environmental documents. In proposing the change to Vehicle Miles Traveled (VMT) from Level of Service (LOS), this flexibility will be taken away. The Districts feel that VMT is not an appropriate metric for comparing the spectrum of wastewater and solid waste projects for which we are responsible. In a larger sense, a VMT analysis may be inappropriate for certain industrial, commercial, or residential projects.

VMT requires both trip generation and trip length. Depending on the type of project, it may be pure speculation to try to determine the trip length. For instance, when a new project is being developed, the distance traveled by employees is an unknown. Some may come from nearby communities, others may travel significant distances to obtain employment.

Additionally, with the shift to VMT, there is the possibility of double counting impacts. For instance, who would be responsible for mitigation if a housing developer has to account for the miles traveled by the new residents to and from their place of employment, and a business has to account for the distance travel by their employees to and from the place employment. This potentially could result in double mitigation of some impacts.

We would recommend that you consider modifying the proposed regulations so that alternatives could be used in place of the VMT method in situations where the project warranted a different analysis. If you have any additional comments regarding this matter, please contact Mr. Marvin Holmes at (562) 908-4288, extension 2729.

Very truly yours,  
Grace Robinson Hyde

  
Christopher R. Salomon  
Supervising Engineer  
Planning Section

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DOC # 3155344