



June 8, 2020

The Honorable Gavin Newsom
Governor, State of California
State Capitol
Sacramento, CA 95814

RE: Request the Delay of the implementation of Title 14 of the California Code of Regulations, Section 15064.3

Dear Governor Newsom,

On behalf of the South Orange County Economic Coalition (SOCEC) we are joining in with hundreds of cities and organizations who are also concerned about a new regulation that will be officially enforced starting July 1, 2020. This regulation – Title 14 of the California Code of Regulations, Section 15064.3, Vehicle Miles Traveled (VMT) – will pose a serious threat to the health and welfare of residents and private employers of California given the fact that California along with the rest of the world, are experiencing the havoc and panic the COVID-19 pandemic is causing.

As Governor, you have taken crucial steps to mitigate and ease the impact of the Statewide Stay-at-Home Order repercussions and its vast impact on individuals and private employers as they deal with severe economic impacts they have suffered. We sincerely appreciate your actions in directing government at all levels to move or delay reporting and regulatory deadlines of all types.

As you are aware, all cities will be required by this new state law to adopt a threshold of significance to vehicle miles traveled (VMT) to be imposed on new housing development projects which are so critical to our state's severe housing shortage, among others. The adoption of the VMT threshold is a very complex matter and requires the services of expensive expert traffic engineers, tremendous city staff time and resources and multiple public meetings to ensure public input on the adoption of the threshold.

Additionally, the COVID-19 pandemic is resulting in dramatic changes in transportation patterns such as the expansion of working from home, learning from home, and even receiving medical care from home via remote communication technologies, as well as 90% decreases in public transit ridership based on social distancing and related health priorities, the requested

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extension will allow for the informed consideration of VMT and other potential changes to California Environmental Quality Act (CEQA).

Therefore, on behalf of the hundreds of employees and businesses we represent, we respectfully request that you extend the implementation date of Title 14 of the California Code of Regulations, section 15064.3 until July 1, 2021. Please allow Californians to get back on their feet and get our economy operating at full steam throughout the phase-in periods.

Sincerely,



Barbara J. Thomas
Executive Director

Cc: SOCEC Board of Directors
SOCEC Advocacy Committee
South Orange County State Senate Delegation
South Orange County State Assembly Delegation