March 11, 2016

Honorable Kevin de León  
Honorable Anthony Rendon  
Senate President pro Tempore  
Assembly Speaker  
State Capitol, Room 205  
State Capitol, Room 219  
Sacramento, CA 95814  
Sacramento, CA 95814

Ken Alex, Director  
Governor’s Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

RE: SUPPORT for Updates to CEQA Guidelines on Evaluating Transportation Impacts

Dear President pro Tem de León, Speaker Rendon, and Mr Alex:

We thank you for the opportunity to provide comments on the Governor’s Office of Planning and Research’s (OPR) Revised Proposal on Updates to the California Environmental Quality Act (CEQA) Guidelines on Evaluating Transportation Impacts. Our organizations are invested in and committed to the successful implementation of these guidelines per SB 743 (Steinberg, 2013), which will remove an obstacle that California communities face in creating healthy, sustainable, and affordable transportation options: safe places to walk and bike; communities with a mix of uses to live, work, learn and play; and housing that people of all ages, incomes and abilities can afford. With other states and the U.S. Department of Transportation looking to California as they consider similar changes to environmental laws, it is critical to get these guidelines right as a precedent for the rest of the nation.

We strongly support the following elements of the CEQA guidelines and Technical Advisory:

1) **Replacement of Level of Service with Vehicle Miles Traveled (VMT) in transportation analysis statewide.** Using VMT as the metric for transportation impacts under CEQA will align with greenhouse gas emissions reduction efforts, and provide the appropriate streamlining incentive for projects that support multi-modal transportation, reduce VMT, and achieve the intent of enacting legislation.

2) **Clarification of the existing requirement that induced VMT be calculated for all roadway expansion projects.** Nearly twenty studies, summarized in a policy brief by the National Center for Sustainable Transportation demonstrate overwhelming evidence that roadway capacity projects induce additional driving, increasing total vehicle miles traveled. CEQA requires that projects analyze and mitigate all of their environmental impacts. OPR has clarified and articulated in the Technical Advisory all sources of induced VMT to accurately estimate the full environmental impacts associated with new capacity expansion projects. Omitting induced demand leads to underestimating a project’s environmental impact, and overestimating its congestion reduction benefits.

3) **Provision of clear methods for analyzing transportation projects to account for their full effect on VMT.** Current practice requires analysis of VMT for roadway capacity projects, but analysis is uneven at best. OPR provides clear guidance on estimating the full VMT effects resulting from such projects, including those resulting from their effect on land use, which was already required by CEQA before SB 743.

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4) Provision of recommendations for VMT thresholds that are connected to state greenhouse gas targets. Transportation GHG accounts for 37 percent of state GHG emissions. Because roadway projects generally induce substantial VMT and increase GHGs, it is important that lead agencies understand the implications of their infrastructure investments, and mitigate where feasible.

5) Recommendation of streamlining for active transportation projects and Bus Rapid Transit on arterial corridors. The new guidelines will facilitate more walking and bicycling projects, as well as improvements to existing bus systems and bus rapid transit projects, especially in urban, suburban and transit-oriented areas. In these transit-priority areas, activity centers can be linked together forming higher quality transit oriented districts and destinations are closer making shorter trips by foot and bike convenient and feasible.

6) Recommendation of streamlining for development within a half-mile of transit stations, taking into account other factors such as parking ratios. These reforms to the CEQA guidelines remove a key barrier to infill and TOD by assuming that projects within a half-mile of a high-quality transit corridor will have less than a significant impact on vehicle-miles traveled. We appreciate the acknowledgment in the technical advisory that other factors such as the amount of parking provided are also key factors to consider, in addition to proximity to transit.

7) The guidelines promote public health, environmental justice, and climate goals by removing a key barrier to infill development in existing communities, which supports provision of infrastructure in many disadvantaged communities where people are already walking and bicycling.

8) The guidelines provide recommendation for thresholds that promote consistency with Sustainable Communities Strategies, but allow flexibility for local jurisdictions to set more stringent VMT standards where appropriate. The guidelines support SB 375 and other targets established in state policy by setting a threshold of 15% VMT reduction, but allow local jurisdictions to be more ambitious in setting local targets. Because local jurisdictions control land use and development regulations despite the vision outlined in the SCS, project-level VMT analysis is especially critical in high-growth areas or new areas that are not identified for development in the SCS to ensure the region achieves its GHG reduction target. The guidelines provide flexibility and guidance for VMT analysis based on the capacity of the jurisdiction and data available.

9) Two-year opt-in period provides ample time for new CEQA guidelines to apply to all projects, including goods movement projects and projects already planned or programmed. As noted above, project-level VMT analysis is already a common practice for jurisdictions, the guidance simply clarifies how it should be estimated and applied under CEQA. The two-year opt-in period provides more than enough time to implement a VMT analysis. If we continue to delay these guidelines, we will not meet our climate goals. Executive Order B-32-15 acknowledges that goods movement projects generate a high portion of local pollution, and any exemption of goods movement corridor projects from VMT analysis could counter the benefits of investments in cleaner freight vehicles. If we want to meet our goal to cut petroleum use in cars and trucks by up to half from current levels in 2030, we need to implement these guidelines now to ensure we reduce VMT while moving our goods more efficiently.

If you have any questions, please contact Jeanie Ward-Waller (jeanie@calbike.org).

Sincerely,

Bill Sadler, California Senior Policy Manager
Safe Routes to School National Partnership

Wendy Alfsen, Executive Director
California Walks

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Kevin Hamilton, President and CEO
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Kevin Hamilton, Founding Member
Medical Advocates for Healthy Air

Rev. Earl W. Koteen, Environmental Justice Minister, Member Coordinating Cmte for SunFlower Alliance

Jill Ratner, President
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Nancy J. McKeever, Senior Land Use Project Manager (retired)

Joel Ervice, Associate Director
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