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September 18, 2019

David S. Kim, Secretary
California State Transportation Agency (CalSTA)
915 Capitol Mall, Suite 350B
Sacramento, CA 95814
via email: David.S.Kim@calsta.ca.gov

Re. SB 743 Implementation | Progressive Guidance for Caltrans on Phase-in of VMT Analysis for Legacy Highway Widening Projects

Dear Secretary Kim:

Welcome to your new role as CalSTA Secretary, and congratulations on your confirmation. We hope that you are excited about the opportunity that lies before you to shape the direction in which transportation is managed in California. We also hope that we and other allies in the ClimatePlan network can be partners with you as you work to ensure that that direction is consistent with and serves multiple State goals, including goals related to mobility, accessibility, mode shift, vehicle miles traveled (VMT) reduction, Vision Zero, and other equity and health-related goals.

We look forward to our upcoming meeting with you on September 24, 2019, as an initial opportunity for us to discuss SB 743 implementation and other critical transportation issues. SB 743¹ -- which changes the focus of transportation impact analysis in CEQA from measuring impacts to drivers (vehicle delay, referred to as level of service), to measuring the impacts of driving (measured as VMT) -- aims to bring transportation project delivery in better alignment

¹ Senate Bill 743 (Steinberg, 2013). See <https://dot.ca.gov/programs/transportation-planning/office-of-smart-mobility-climate-change/sb-743>

with State greenhouse gas reduction goals, by encouraging equitable infill development and non-single occupancy vehicle modes.

We, the undersigned organizations, have been tracking and advocating for implementation of SB 743 that maximizes its potential for achieving those aims, and we will continue to do so. Attached are three letters that provide some insight into our history of engagement with this topic. In short, we assert that CEQA significance thresholds (for greenhouse gas emissions and transportation impacts) should align with the California Air Resources Board's identified per capita VMT reduction target, as documented in the 2017 Climate Change Scoping Plan², as well as the Office of Planning and Research's Technical Advisory on SB 743 implementation³. We also call for an expedient phase-in process for conducting induced VMT impact analysis -- analysis which follows OPR's recommended elasticity methodology -- on projects *in the near-term*.

Your leadership will set the tone for how decisions are made in both of these related issue areas. We encourage you to err on the side of progress.

By that we mean that it is time to take a critical eye to auto-oriented projects and truly turn the page on an outdated, 20th century planning paradigm. We implore you to *not* grandfather in all previously-conceived-of highway widening projects as exempt from VMT impact analysis or only requiring insufficient VMT mitigations. Rather, we urge you to use this opportunity to rethink the merits of those projects that have not yet been environmentally certified. By establishing an expedient phase-in process that requires induced VMT impact analysis for a more extensive set of projects, rather than unnecessarily delaying this shift, you can shape the future of transportation investments to be significantly more in line with State climate and multimodal mobility goals now.

Improving mobility options and promoting infill development can have unintended consequences, though, which we encourage you to be proactive about addressing. Induced VMT impact analysis will help streamline the development process of housing in low-VMT and transit-oriented locations, thereby helping increase the supply of housing options in areas with low transportation costs. However, as neighborhoods change and property values increase with new investment and development, there is risk of gentrification and displacement. Research shows that preserving affordability and avoiding such displacement while building more infill housing avoids increases in VMT. We implore you to recognize the relationship between income and VMT and to address this risk of increased VMT. One way of doing so would be to provide high-level recommendations on mitigating the risk of displacement, including best practices from communities across California that have confronted these issues while improving multimodal mobility and building more infill and transit-oriented development.

² <https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf>

³ <http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf>

We stand ready to enthusiastically support you in doing so.

If you have any questions about the content of this letter, please contact Bryn Lindblad at blindblad@climateresolve.org / 213-634-3790 x102.

Sincerely,

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Enclosures (3):

(1) Letter from ClimatePlan network partners to Caltrans Director Berman on February 6, 2019 entitled 'SB 743 Implementation | Recommendations re. Expediency, Effectiveness & Transparency for Developing VMT Impact Analysis Guidelines'

(2) Letter from ClimatePlan network partners to Caltrans Director Berman on July 25, 2018 entitled 'June 2018 Draft Interim Guidance: Determining CEQA significance for Greenhouse Gas Emissions for Projects on the State Highway System'

(3) Letter from ClimatePlan network partners to Caltrans Director Berman on March 15, 2018 entitled 'CEQA EIRS | Call for Caltrans to Commit to Doing Induced VMT Impact Analysis'

cc:

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