

ClimatePlan



March 6, 2020

Ellen Greenberg
Caltrans - Department of Sustainability
1120 N Street
Sacramento, CA 95814

Dear Ms. Greenberg and Caltrans Staff,

We are writing in response to your request for an informal review of Caltrans' Draft SB 743 Implementation Memo which is dated February 12, 2020. The organizations listed below have carefully reviewed the Implementation Memo and wish to provide the following comments.

- 1) We are encouraged by SB 743 applying to all projects on the State Highway System including those where the lead agency is a local agency partner, rather than CalTrans. This is a powerful next step towards our shared goal of reaching our 2030 GHG emission targets.

- 2) We encourage Caltrans to create a threshold of significance that ensures every highway project reduces VMT proportionally to what the state must reduce VMT by in order to meet our climate goals. Right now, there isn't a clear threshold. This will make it challenging for local jurisdictions and MPOs to ensure transportation projects are reducing emissions and achieving our GHG emission goals. Caltrans could use OPR's guidance and standard as a threshold metric.

- 3) We encourage Caltrans to think and plan holistically as SB 743 implementation moves forward and to think about how [ClimatePlan's Investment without Displacement platform](#) can impact decision-making around implementation, specifically in the realm of infill development. The SB 743 implementation memo currently reads, "these changes to the environmental review process aim to reduce automobile dependency by supporting infill development, reducing average length of vehicle trips, and increasing use of more sustainable modes including carpooling, cycling, walking, and transit" (Caltrans Draft [Implementation Timing Memo](#), pg. 2). For the language around infill development, we recommend the following changes (suggestions are italicized and bolded): "to reduce automobile dependency by supporting ***equitable*** infill development ***with tenant protections...***"

There is no time for incremental change. SB 743 implementation is an opportunity to be bigger and bolder and help the state meet its climate goals and to set a precedent for the nation that planning for climate change and equity within our transportation decisions can generate economic growth and thriving communities for all. California can no longer plan for transportation and housing in silos; there is no need for conflicting messages on housing and transportation (ex. "Build more housing, but have less roads"). Rather, SB 743 implementation is an opportunity for Caltrans and Governor Newsom's administration to share an urgent, long-term vision that paints a picture for California residents of what vibrant communities can look like 15, 30, and 50 years from now.

We are grateful for the opportunity to respond to this draft Implementation Timing Memo and we are also grateful to Caltrans staff for all of their work on this exciting piece of legislation. We look forward to partnering with Caltrans about how SB 743 can best be implemented.

Sincerely,

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Safe Routes Partnership
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