



October 13, 2017

Governor Edmund G. Brown
c/o State Capitol, Suite 1173
1315 10th Street
Sacramento, CA 95814

Re: Finalizing the Senate Bill 743 Guidelines and Applying Them Statewide

Dear Governor Brown,

We submit this letter on behalf of the undersigned organizations. Our organizations were strong supporters of Senate Bill 743 (Steinberg, 2013), which directed the Governor’s Office of Planning and Research (OPR) to change how transportation emissions under the California Environmental Quality Act (CEQA) are analyzed. Specifically, SB 743 replaced the Level of Service (LOS) “auto delay” analysis for determining a project’s transportation impacts with a more appropriate Vehicle Miles Traveled (VMT) metric and potentially eliminates this review altogether for infill projects close to major transit.

LOS disproportionately burdens infill projects and related infrastructure by privileging automobile traffic over pedestrians, bicyclists, and transit riders. VMT represents a far more accurate measure to determine transportation impacts and will ensure that CEQA review better aligns with the state’s larger environmental and land use policy goals, particularly to encourage infill. Given the centrality of this change to achieving the state’s goals on land use under Senate Bill 375 (Steinberg, 2008) and climate

change under Senate Bill 32 (Pavley, 2016), we encourage applying this metric statewide to all projects, particularly all transportation projects. Furthermore, VMT analysis is generally more straightforward to complete than calculating LOS, which makes the environmental review process less resource-intensive.

Yet the process of finalizing the guidelines has been unreasonably delayed. SB 743 required OPR to circulate draft guidelines by July 1, 2014. The draft elicited extensive comments from stakeholders, including the organizations represented here, and OPR issued revised guidelines in January 2016 that addressed many of the requested changes. However, those of us who care about this important change to state law have been waiting for almost two years for these revised guidelines to be certified.

We respectfully request that you urge your administration to finalize these long-overdue guidelines immediately. Every day represents a missed opportunity to lift the burden of outdated and inefficient CEQA review on environmentally advantageous projects. California can wait no longer.

Sincerely,

Curt Johansen, Chairman
Council of Infill Builders

Mark Vallianatos, Director
LAplus

Amanda Eaken, Transport. & Climate Dir.
Natural Resources Defense Council

Chanell Fletcher, Director
ClimatePlan

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Investing in Place

Stuart Cohen, Executive Director
TransForm

Colin Parent, Interim Executive Director
Circulate San Diego

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cc: Director Ken Alex
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