



December 20, 2016

Members of the California Transportation Commission
1120 N Street, MS-52
Sacramento, CA 95814

Re: Comments on the Caltrans Local Development – Intergovernmental Review Program & SB 743

Dear Members of the California Transportation Commission,

I submit these comments on behalf of the Council of Infill Builders, a statewide organization of real estate professionals committed to improving California through infill development. Our organization appreciates the opportunity to provide input on the Caltrans “Local Development – Intergovernmental Review Program” and its recent update to incorporate Senate Bill 743 (Steinberg, 2013) goals.

The Council of Infill Builders applauds the Department of Transportation (Caltrans) for incorporating SB 743’s directive to replace the Level of Service (LOS) analysis for determining a project’s transportation impacts under the California Environmental Quality Act (CEQA) with a Vehicle Miles Traveled (VMT) metric. 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.

We believe Caltrans correctly updated its program guidelines to reflect state priorities to reduce VMT and boost infill. We also support the agency’s efforts to ensure funded projects are consistent with Senate Bill 375 (Steinberg, 2008) and account for the impact of local land use decisions on VMT.

Please let me or my colleagues know if you have any questions or would like to discuss further.

Sincerely,

Curt Johansen
Chairman, Council of Infill Builders

cc: Director Ken Alex
Governor’s Office of Planning and Research
P.O. Box 3044
Sacramento, CA 95812-3044