



May 26th, 2020

Honorable Gavin Newsom, Governor
State of California
State Capitol, Suite 1173
Sacramento, CA 95814

Re: Expeditious implementation of the Vehicle Miles Traveled guidelines for transportation impact analysis per SB 743 (2013)

Dear Governor Newsom,

We, the undersigned organizations, are grateful for the decisive actions you've taken to protect Californians during the COVID-19 pandemic. We understand the far-reaching impacts of COVID-19 and know that difficult choices will need to be made. We are aware that there are requests from some parties to postpone the implementation of SB 743 (2013); we urge you to not further delay the implementation of this very important statute.

COVID-19 has created an economic crisis for California, and the magnitude of the challenges ahead for our state's recovery are immense, but postponing implementation of SB 743 would be a mistake. Rather, expeditious implementation of SB 743 is now all the more important to ensure a more sustainable, equitable, and resilient future for California.

We greatly sympathize with the challenges facing our state's developers, businesses and agencies, but complaints that SB 743 compliance will be over-burdensome are ill-founded. **SB 743 will not inhibit development—effective SB 743 implementation will be an economic engine for precisely the kind of land use development and transportation infrastructure that California needs.**

SB 743 mandated the Governor's Office of Planning and Research to develop a new methodology for evaluating transportation impacts to replace the antiquated automobile-only "Level of Service" (LOS) method, which had long been found to obstruct quality infill development and densification. After years of cross-sector input, the California Environmental Quality Act (CEQA) guidelines for this new multi-modal methodology, based on Vehicle Miles Travelled (VMT) performance, were adopted by the Natural Resources Agency in 2018.

Not only have developers and agencies had **7 years** to prepare for the implementation of this statute, **the VMT-based methodology is in most cases less complex to conduct than LOS**. Upon implementation of SB 743, many land use and infrastructure projects that California needs to meet its climate, public health and equity goals will not be required to perform this transportation analysis at all. Projects presumed to reduce VMT—including transit and active transportation projects, commercial and housing development within proximity to transit or within low-VMT zones, and all affordable housing—are all exempt from conducting the new analysis.

Further, where VMT-increasing projects are deemed necessary, that VMT impact will be mitigated by offsetting VMT-reducing projects of the like listed above—in turn providing an economic stimulus to exactly the projects California needs to accelerate.

VMT reduction is a very good proxy metric for GHG reduction from improved land use and transportation behavior. As noted in ClimatePlan's recent blog post¹, VMT reduction also provides many co-benefits to natural resource conservation, public health, and social equity that this improved land use can provide. Resulting increases in active transportation and improved air quality yield substantial health benefits, including very significant reductions in chronic illnesses that drive persistent health inequities, such as diabetes and cardiovascular disease, and currently, an increased risk of COVID-19 mortality.

The importance of VMT reduction in meeting our climate goals cannot be overstated. The CA Air Resources Board's (CARB) [2017 Scoping Plan Update](#) outlines the State's strategy to meet GHG emission reduction goals mandated by AB 32 and SB 32 (80% below 1990 levels by 2050). The report finds that, **even with 100% zero emission vehicles and 75% of energy production from renewable sources, we will still need 15% more per capita VMT reduction beyond what is projected by our current Regional Transportation Plans / Sustainable Community Strategies** (2017 Scoping Plan Update, pg. 101).

In short, clean vehicles and clean energy will not alone be sufficient for achieving our goals. We must significantly change historic growth patterns to enable people to drive less. Yet, despite broad recognition of this need, **CARB's most recent [2018 Progress Report on SB 375 \(2008\) implementation has illustrated that per capita VMT is going up in California](#)**, not down, and none of the State's regions are on track to achieving their respective GHG reduction targets through improved land use and transportation as mandated by SB 375 (2018 Progress Report, pg. 4).

The Fourth National Climate Assessment and abundant supporting research suggest that we have only a decade to turn the tide before we will incur irreparable catastrophic effects from climate change—the impacts of which could be far greater than those we are experiencing from the COVID-19 pandemic.

¹ ClimatePlan. 2020. "ICYMI: Here's why we need to implement SB 743 in the middle of a global pandemic." Retrieved here: <https://bit.ly/2z8IRRI>

If implemented effectively, SB 743 will be the strongest policy tool California has developed in over a decade to encourage the growth we need to meet the looming climate crisis. We need to rebuild the economy by building projects that will be both sustainable and equitable for the long term. The statute has already taken seven years to implement, and California cannot afford to delay its execution any longer.

Thank you for your consideration, and for your leadership in these difficult times. Please contact Matt Baker at matthew@pcl.org with any questions.

Sincerely,

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Cc

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