



June 26th, 2020

**[Resubmittal of the same letter, dated May 26<sup>th</sup>, reflecting additional signatories]**

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 post<sup>1</sup>, 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

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<sup>1</sup> 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>



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.

**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](mailto:matthew@pcl.org) with any questions.

Sincerely,

Matthew Baker  
Policy Director, Planning and Conservation League

Chanell Fletcher  
Executive Director, ClimatePlan

Bryn Lindblad  
Deputy Director, Climate Resolve

Noah Harris  
Transportation Policy Advocate, Climate Action Campaign

Julia Randolph  
Policy and Outreach Associate, Coalition for Clean Air

Wesley Reutimann  
Special Programs Director, Active San Gabriel Valley

Rick Longinotti,  
Co-Chair, Campaign for Sustainable Transportation

Chuck Mills  
Director, Public Policy and Grants, California ReLeaf

Jonathan Matz  
California Senior Policy Manager, Safe Routes Partnership

Christy Zamani  
Executive Director, Day One



Jay Ziegler  
Director of External Affairs & Policy, The Nature Conservancy

Carter Rubin  
Mobility and Climate Advocate, NRDC

Joshua Hardy Stark,  
State Policy Director, TransForm

Grecia A. Elenes  
Senior Policy Advocate, Leadership Counsel for Justice and Accountability

Tina Yuen  
Senior Planner, ChangeLab Solutions

Claire Robinson  
Managing Director, Amigos de los Rios

Dan Silver  
Executive Director, Endangered Habitats League

Tom Wheeler  
Executive Director and Staff Attorney, Environmental Protection Information Center

Colin Fiske  
Executive Director, Coalition for Responsible Transportation Priorities

Linda Rudolph, MD, MPH  
Center for Climate Change and Health

Jared Sanchez  
Senior Policy Advocate, California Bicycle Coalition

Ellie M. Cohen  
Chief Executive Officer, The Climate Center

Zoe Siegel  
Director of Special Projects, Greenbelt Alliance

Ralph Propper  
President, Environmental Council of Sacramento

Melissa Romero  
Legislative Affairs Manager, California League of Conservation Voters

Esther Rivera  
Interim-Executive Director/Deputy Director, California Walks

Denny Zane  
Executive Director, Move LA



Ron Sundergill  
Senior Regional Director, Pacific Region, National Parks Conservation Association

Claire Donahue  
Hub Coordinator, Sunrise Movement L.A.

Gene Wester, PhD.  
Steering Committee, Pasadena Complete Streets Coalition

Jeanne Merrill,  
Policy Director, California Climate & Agriculture Network

Kathryn Phillips  
Director, Sierra Club California

David Mogavero  
Principal, Mogavero Architects

Leonora Camner  
Executive Director, Abundant Housing LA

Kathy Dervin  
350 Bay Area

Rico Mastrodonato  
Senior Government Relations Manager

Pamela Flick  
California Program Director, Defenders of Wildlife

Cheryl Brown  
Political Director, Save The Bay

Veronica Tovar  
Environmental Justice Program Manager, Catholic Charities of the Diocese of Stockton

Kate Wright Meis  
Executive Director, Local Government Commission

Cc  
Ann O'Leary, Chief of Staff, Office of Governor Newsom  
Ana Matosantos, Cabinet Secretary, Office of Governor Newsom  
Mark Tollefson, Deputy Cabinet Secretary, Office of Governor Newsom  
Rhonda Pascal, Deputy Legislative Secretary, Office of Governor Newsom  
Jason Elliot, Senior Counselor, Housing and Homelessness, Office of Governor Newsom  
President pro Tempore Toni Atkins, California State Senate  
Kip Lipper, office of President pro Tempore Atkins  
Speaker Anthony Rendon, California State Assembly  
Carrie Cornwell, office of Speaker Rendon



Kate Gordon, Director, Office of Planning and Research  
Chris Ganson, Senior Planner, Office of Planning and Research  
Secretary David S. Kim, California State Transportation Agency  
Deputy Secretary Darwin Moosavi, California State Transportation Agency  
Toks Omishakin, Director, California Department of Transportation  
Ellen Greenberg, Deputy Director for Sustainability, California Department of Transportation  
Secretary Jared Blumenfeld, California Environmental Protection Agency  
Chair Mary Nichols, California Air Resources Board  
Heather King, Air Pollution Specialist, California Air Resources Board