



April 24, 2015

Assembly Member Das Williams, Chair
Natural Resources Committee
1020 N Street, Room 164
Sacramento, CA 95418

RE: AB 779 (C. Garcia) Environmental quality: transit priority areas.--OPPOSE

Dear Assembly Member Williams and Committee Members:

On behalf of the undersigned organizations, we must respectfully oppose AB 779 by Assembly Member Cristina Garcia. We strongly support California's leadership in climate policy. AB 779 unnecessarily delays the state's progress on both fighting climate change and encouraging the development of sustainable communities.

The transportation sector accounts for almost 40% of California's greenhouse gas emissions. One of the ways to reduce transportation emissions is to provide robust transportation options and reduce reliance on car travel. California's landmark Sustainable Communities and Climate Protection Act (SB 375) of 2008 addresses this issue by integrating transportation and land use planning to reduce greenhouse gas emissions. Unfortunately, the existing measure of transportation impacts under the California Environmental Quality Act (CEQA) rewards car travel, and therefore is inconsistent with California's sustainability goals. We were thrilled in 2013, when the legislature passed SB 743 to help align CEQA with the state's sustainability goals and to help implement SB 375. Delaying the new CEQA Guidelines would delay the state's progress on developing sustainable communities.

The replacement of the Level of Service (LOS) metric with a vehicle miles traveled (VMT) metric corrects unintended consequences of CEQA. LOS is a flawed measure of environmental impacts. Based on an LOS analysis, infill development and transit improvements appear to have a worse environmental impact than sprawled development and multi-lane highways. For example, LOS analysis discourages pedestrian crosswalks and can result in crosswalk projects needing to "mitigate their impacts" by paying for infrastructure that allows cars to travel more quickly.

In comparison, the VMT metric more accurately measures the environmental impacts of transportation. Under the new Guidelines, CEQA analysis will for the first time encourage infill development, rather than

discourage it. The new Guidelines reduce litigation burden for infill development. The state should implement the Guidelines to reform its antiquated transportation analysis as soon as possible.

Analyzing VMT is a standard procedure in transportation planning. One of the reasons that the Office of Planning and Research (OPR) proposed the VMT metric is because it is already analyzed under CEQA as part of the greenhouse gas emissions analysis. VMT models have been shown to be much easier to use and take a fraction of the time of a typical LOS model. Project-level travel models have existed and been used for many years and numerous examples are listed in OPR's draft Guidelines.

Currently, OPR is in the middle of a thorough and rigorous process of revising its draft CEQA Guidelines. AB 779 pre-emptively delays the implementation of these Guidelines. We supported the LOS changes in SB 743 and believe the process should proceed as currently required by law. We do not think a delay is warranted or necessary. For these reasons, we must oppose AB 779.

Thank you for your consideration,

Matthew Baker
Habitat Director
Environmental Council of Sacramento

Stuart Cohen
Executive Director
TransForm

Amanda Eaken
Deputy Director, Urban Solutions
Natural Resources Defense Council

Jeremy Madsen
Executive Director
Greenbelt Alliance

Jeanie Ward-Waller
Senior California Policy Manager
Safe Routes to School National Partnership

Ben Winig
Senior Staff Attorney & Program Director
ChangeLab Solutions