



November 21, 2014

Mr. Ken Alex, Director  
Governor's Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

Re: Updating Transportation Impacts Analysis in the CEQA Guidelines

Dear Mr. Alex:

The Rural County Representatives of California (RCRC) represents thirty-four rural counties across California. Our Board of Directors is comprised of one elected Supervisor from each member county. We appreciate this opportunity to comment on the Preliminary Discussion Draft of the Proposed Changes to the California Environmental Quality Act (CEQA) Guidelines Implementing Senate Bill (SB) 743 (Steinberg, 2013).

The RCRC Board understands the need to promote sustainable growth, sustainable resources, and sustainable economic conditions in rural California. Our counties are tasked with a variety of decision-making responsibilities related to development and land use in rural California communities and are challenged with environmental stewardship, economic vitality, and social equity at the local level. Our counties are also committed to achieving realistic greenhouse gas (GHG) emission reductions through sustainable land use planning policies and facilitating infrastructure development and services to provide alternative transportation modes and healthier behavior options. From this perspective we would like to offer the following comments.

The long practiced use of level of service (LOS), or automobile delay, as a criterion for determining the significance of transportation impacts of a project is often a barrier to infill development and can contribute to discouraging other transportation modes. SB 743 requires the Governor's Office of Planning and Research (OPR) to prepare proposed revisions to the CEQA Guidelines establishing alternative criteria for determining the significance of transportation impacts of projects *within transit priority areas*. SB 743 further *allows* OPR to establish alternative metrics for transportation impacts outside transit priority areas. Our primary concern with the draft proposal is the mandated application of the proposed alternative metric, vehicle miles traveled (VMT),

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to the entire state by January 1, 2016. First, we believe that any adopted alternative metric should only be applied as a “pilot project” within the transit priority areas in a select few larger metropolitan areas, before rolling it out statewide to all areas outside transit priority areas. It seems it would be valuable to test the VMT metric in the select areas of the state prior to its application in the more suburban and rural areas of the state.

Unfortunately, RCRC believes that choosing any alternative metric at this point is likely to cause unintended consequences, such as a new onslaught of litigation due to new uncertainties and speculation. Even the relationship between the VMT metric for CEQA evaluation and the LOS metric for those counties that still may use LOS in their general plans or fee programs will add to the uncertainties. It will be important to ferret out the difficulties with implementation of the proposed VMT before extending into other areas of the state, especially in rural areas where transit priority areas do not exist and where transit options are limited.

Also, we do not believe that VMT can be applied in the same manner in the urban transit priority areas as in a rural developed area. As an example, using the regional average VMT by land use type as the threshold of significance for the urban setting can have vastly different consequences than in dispersed rural communities. Additional case studies and methodologies should be considered for rural areas before a statewide application is required. SB 743 tacitly implies there may be a different implication for rural areas by not mandating a statewide application. RCRC believes the proposed January 1, 2016, statewide application is premature.

Additionally, there is not a mandate to require only one universal methodology to be applied statewide. There are diverse circumstances not only between urban, suburban, and rural areas of the state, but also within each of those categories. The Guidelines should provide a suite of options for evaluating transportation impacts and the flexibility for the jurisdictions to select that which is appropriate for a defined geographic area.

Our counties are keenly aware of the importance of the conservation of agricultural and mineral lands and the proper management of forests and watersheds, and work to promote compact development in our developed core areas. The sustainable land use practices in rural areas benefit not only environmental resources and economic vitality, but GHG emission reductions as well. RCRC has long been advocating that infill development exists within our rural counties at densities appropriate to the rural settings. However, much of the infill legislation and funding opportunities are focused in the urban areas, except when it comes to restrictive regulations.

RCRC supports the Rural Counties Task Force and our various member counties’ specific concerns and observations with the VMT proposal and believe that more consideration should be given to the rural application of alternative metrics prior to any mandate.

Thank you for this opportunity to provide input into this important process. If you have any questions or wish to have further discussions, please do not hesitate to contact me at (916) 447-4806.

Sincerely,

A handwritten signature in black ink that reads "Mary Pitto". The signature is written in a cursive style with a large, prominent "P" in the last name.

Mary Pitto  
Regulatory Affairs Advocate

cc: RCRC Board of Directors  
Christopher Calfee, Senior Counsel, OPR  
Jerry Barton, Chair, Rural Counties Task Force