



June 11, 2020

Toks Omishakin  
Caltrans Director  
1120 N Street  
P.O. Box 942873  
Sacramento, CA 95814

**RE: Comments on SB 743 Implementation**


Dear Director Omishakin:


On behalf of the San Joaquin Valley Regional Planning Agencies Policy Council (Policy Council), we appreciate the opportunity to provide comments on the implementation of SB 743. The Policy Council represents the eight county metropolitan planning organizations and the 62 cities of the San Joaquin Valley on regional transportation and air quality issues. We have serious concerns about the implementation of SB 743, and its potential adverse effects on major goods movement transportation projects, and on housing and transportation cost for our disadvantaged communities.


Under SB 743, Caltrans and other California Environmental Quality Act (CEQA) practitioners, will adopt new guidance for CEQA significance determinations, including identifying the best approach for analyzing vehicle miles traveled (VMT) and induced travel for new projects. This effort stems from SB 743, which established special administrative and judicial review procedures under CEQA for the City of Sacramento's Golden 1 Sports Center. The bill, however, has been construed as providing guidance on reforming transportation and CEQA planning practices statewide, rather than for a specific project.


The San Joaquin Valley is the heart of California's transportation system, and is a major generator of economic activity within California. A significant majority of our agricultural commodities are transported by truck primarily using State Route 99, Interstate 5 and other major east-west corridors. Many of the transportation projects that are currently identified for construction through existing regional sales tax measures will improve these state highways and eliminate dangerous congestion bottlenecks. We have made promises to our voters to work with Caltrans to help fund these regional projects through our sales tax measures. The interpretation and implementation of SB 743 will impede these construction efforts, and contradicts the commitments we have made to our residents for locally funded highway improvements.

SB 743 also has an adverse impact on the cost of housing and transportation for our numerous disadvantaged minority communities. Costly VMT mitigation measures to be imposed by jurisdictions on new housing projects from SB 743, and an emphasis on job creation in urban centers,

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will increase, not decrease VMT. As a result, our lower income households will be burdened with additional housing and transportation costs resulting from SB 743.

The Valley's population is currently near 4.35 million residents and has grown by 159 percent since 1980. By 2050, our population will nearly double in size. We need to accommodate this projected growth and are not able to "rise" as a region if we sacrifice economic development through the restrictive and costly measures included in SB 743.

We do not support SB 743; however, we have several solutions to offer for your consideration:

1. Encourage and incentivize teleworking. The COVID-19 pandemic has provided a crash course in demonstrating that technology can be a solution to alleviating traffic congestion, improving air quality and quality of life.
2. Provide greater incentives for the purchase of electric vehicles, installation of charging stations along the state highway system, and retrofit homes to provide the proper charging outlets. This would provide for an immediate, cost-effective solution to improving air quality while enhancing mobility for residents.
3. Continue making investments into passenger rail service. This includes augmenting funding for grade separation projects to enhance safety from cross traffic, ensuring reliability of service, and reducing idling of vehicles at rail intersections. Continued investments to provide cost-effective and frequent service will help ease congestion and improve air quality.
4. Encourage innovation by transit systems to model service after transportation network companies through offering vanpool service, car sharing, and other alternatives rather than traditional bus routes.
5. Ship more containers and goods via freight rail to reduce truck traffic on major arterials such as Highway 99 and Interstate 5. This would greatly enhance safety, slow down road degradation, and alleviate congestion.
6. Provide greater incentives for businesses to locate or expand operations in the San Joaquin Valley. This would reduce GHGs, VMT, and is a greater return on investment than building expensive high-density housing in already densely populated, high-cost metropolitan areas.

Aside from SB 743, we strongly support the climate goals of the State of California and are deeply committed to improvements to passenger and freight rail systems, reductions in greenhouse gas emissions, reasonable reductions in vehicle miles travelled, improvements to walking, biking and other modes of transportation, and support transportation investments aligned with housing and economic development.

Achieving reductions in VMT amid rapid expansion and growth in our region continues to be a major policy discussion as we work to implement the goals of the Climate Investment Program. We will continue to welcome coordination and dialogue with the CARB, Strategic Growth Council, Housing and Community Development, California Transportation Commission, Caltrans and other State partners to address this topic.

We respectfully request that SB 743 be administered for its original purpose, and not be implemented for projects on the state highway system. We welcome the opportunity to have a constructive conversation on our proposed solutions to truly address mutual goals of reducing GHG and enhancing mobility in our region, and throughout our great state.

Thank you for your consideration.

Sincerely,



Chuck Winn

Chair of the San Joaquin Valley Regional Planning Agencies Policy Council  
Supervisor, San Joaquin County

cc: Kate Gordon, Governor's Office of Planning and Research  
Mary Nichols, California Air Resources Board  
David Kim, CalSTA Secretary