



Climate Action Campaign
3900 Cleveland Ave, Suite 208
San Diego, CA 92103

June 8, 2020

VIA EMAIL: San Diego County Board of Supervisors
5520 Overland Avenue
San Diego, CA 92123

RE: Comment on Transportation Study Guide, Options to Comply with Senate Bill 743 and Implement Vehicle Miles Travelled in Local Planning and Review, PDS2018-POD-18-001

Dear Chair Cox and Supervisors,

Climate Action Campaign is a local nonprofit organization with a simple mission: stop the climate crisis.

We thank you for the opportunity to comment on this proposed Transportation Study Guide, which updates the method by which San Diego County must conduct traffic analysis for development projects under CEQA.

Senate Bill 743, passed in 2013, required local jurisdictions to switch their measurement of transportation impacts from Level of Service (LOS) to Vehicle Miles Travelled (VMT). This switch was intended to incentivize infill development and the sustainable transportation modes we need to reduce greenhouse gas (GHG) emissions from the transportation sector, and ultimately, stop climate change.

The threshold of significance for transportation impacts has been identified at 15% below average VMT. The method by which the average VMT is calculated is extremely consequential when determining the amount of necessary mitigation, and when defining VMT-efficient areas.

County staff have outlined multiple options for calculating average VMT, including: “the regional average, unincorporated county average, and county sub-area averages” (17). **Using the regional average VMT is the only option consistent with OPR’s recommendation and with the legislative intent of SB 743.**

Because of high-VMT in the unincorporated county and county sub-areas, these options raise the threshold of significance much higher than the regional average VMT, effectively reducing the amount of needed mitigation, or entirely exempting some projects from requiring



transportation analysis. These approaches disincentivize climate-friendly projects by making it much easier and more cost-effective to develop urban sprawl than infill development, ultimately reversing the legislative intent of the bill.

Additionally, we are deeply concerned that the County is considering in-County offsite exchanging and banking as VMT impact mitigation measures, as no such program exists, or has been vetted by the Board of Supervisors or public. Plus, any “offsets” are extraordinarily expensive -- both the developers and local agencies will balk at the fees needed. These hypothetical strategies are at the core as to why the County Climate Action Plan is fatally flawed. Offsite mitigation would be incredibly difficult to implement and monitor, and because the impacts are onsite, any mitigation must work to reduce VMTs and GHGs locally.

Continuing to embrace urban sprawl only worsens the disastrous threats of the climate crisis. We urge the Board of Supervisors to adopt guidelines that promote “smart-growth” by rejecting offsite exchanging and banking, and selecting the regional average VMT for geographic implementation of SB-743.

Sincerely,

A handwritten signature in black ink that reads "Noah Harris". The signature is written in a cursive, slightly slanted style.

Noah Harris
Transportation Policy Advocate
Climate Action Campaign