



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

June 3, 2024

The Honorable Isaac Bryan
Chair, Assembly Natural Resources Committee
1020 N Street, Room 164
Sacramento, CA 95814

**RE: Senate Bill 768 (Caballero) – SUPPORT
As Amended May 29, 2024**

Dear Assembly Member Bryan:

On behalf of the Rural County Representatives of California (RCRC), we are pleased to support Senate Bill 768, authored by Senator Caballero, regarding the California Environmental Quality Act (CEQA). RCRC is an association of forty rural California counties; the RCRC Board of Directors is comprised of elected supervisors from each of those member counties.

Senate Bill 768 requires the Transportation Agency to study and evaluate the use of VMT as a metric for measuring and mitigating transportation impacts under CEQA. Of particular interest to RCRC, SB 768 requires an analysis of differences in the availability and feasibility of VMT mitigation measures in rural, suburban, and urban areas, including strategies that can be used in areas where public transportation is inadequate. SB 768 also requires the Transportation Agency to determine the types of projects exempt from VMT analysis.

RCRC has long argued against the statewide application of VMT to analyze and mitigate traffic impacts under CEQA. SB 743 required use of VMT to analyze a project's transportation impacts within a transit priority area (TPA). RCRC strongly opposed the Office of Planning and Research's extension of these requirements statewide because its one-size-fits-all approach does not work. California's 58 counties are extremely diverse in terms of total population, population density, percentage of land under public ownership, economies, median household income, etc. While five California counties have over 2 million residents each (Los Angeles County is the most populous at over 10 million residents), 19 counties have 70,000 or fewer residents, and eight counties have fewer than 20,000 residents. Similarly, while seven counties have a population density of over 1,000 residents/square mile, 18 counties have a population density of under 25/square mile and nine counties have population densities of less than 10/square mile.

1215 K Street, Suite 1650, Sacramento, CA 95814 | www.rcrcnet.org | 916.447.4806 | Fax: 916.448.3154

ALPINE · AMADOR · BUTTE · CALAVERAS · COLUSA · DEL NORTE · EL DORADO · GLENN · HUMBOLDT · IMPERIAL · INYO · KINGS · LAKE · LASSEN
MADERA · MARIPOSA · MENDOCINO · MERCED · MODOC · MONO · MONTEREY · NAPA · NEVADA · PLACER · PLUMAS · SAN BENITO · SAN LUIS OBISPO
SANTA BARBARA · SHASTA · SIERRA · SISKIYOU · SOLANO · SONOMA · SUTTER · TEHAMA · TRINITY · TULARE · TUOLUMNE · YOLO · YUBA

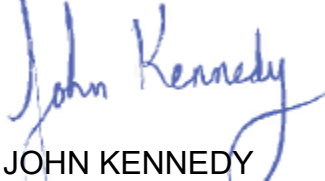
While VMT may be a useful metric to evaluate transportation impacts in dense urban communities, it is poorly suited for application in rural jurisdictions. In rural communities, homes, businesses, and services are located much farther apart than in urban areas. This merely reflects the reality of life in rural areas which is often driven by the fact that either the federal or state government own most of the land in those jurisdictions and that the dominant local economies are industries like agriculture where populations are interspersed among larger, open areas dedicated to productive use. These geographic factors, combined with the low population densities, make VMT a misleading metric that is unsuited for use in measuring or mitigating a project's transportation impacts in rural areas.

Even OPR's December 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA recognizes that in rural areas, "fewer options may be available for reducing VMT."¹ Hindsight has shown this to be a serious understatement. Traditional opportunities to reduce VMT, including development of transit, increased walking, shifting to infill development, carpooling, reduced parking, and imposition of congestion pricing are either not available or not realistic in rural settings. Most mitigation options included in CalTrans' SB 743 Program Mitigation Playbook²⁹ are unworkable in rural California.²

Given the tremendous chasm between the number and cumulative transportation impacts of projects in the state's urban areas and the number and impacts of projects in rural areas, use of VMT outside of urban areas will not meaningfully contribute to achievement of the state's climate change and air quality objectives, will inhibit rural efforts to more effectively measure and mitigate a project's true transportation impacts, and will increase project costs, delays, and litigation in rural areas.

For these reasons, RCRC gladly welcomes SB 768's effort to take a deeper dive into how VMT works as an analytical tool and mitigation measures in different regions of the state. If you should have any questions, please contact me at jkennedy@rcrcnet.org.

Sincerely,



JOHN KENNEDY
Senior Policy Advocate

cc: The Honorable Anna Caballero, California State Senate
Members of the Assembly Natural Resources Committee

¹ California Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018, page 19

² CalTrans SB 743 Program Mitigation Playbook, July 2022, [vmt-mitigation-playbook-07-2022.pdf](https://www.caltrans.gov/sites/default/files/vmt-mitigation-playbook-07-2022.pdf) (ca.gov).

The Honorable Isaac Bryan

Senate Bill 768

June 3, 2024

Page 3

Lawrence Lingbloom, Chief Consultant, Assembly Natural Resources Committee
Casey Dunn, Consultant, Assembly Republican Caucus Office of Policy and
Budget