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California Association for Local Economic Development

April 25, 2022

The Honorable Anna Caballero
State Capitol, Ste. 7620
Sacramento, CA 95814

Dear Senator Caballero:

The California Association for Local Economic Development (CALED), an organization representing over 800 public and private local economic development professionals, is pleased to **Support** your SB 1410, As Amended March 31, 2022.

In brief, this measure narrows the application of existing California Environmental Quality Act (CEQA) guidelines for vehicle miles traveled (VMT) developed by the Governor's Office of Planning and Research (OPR) to only apply to development projects within transit priority areas. Development projects such as housing and economic development uses located outside of transit priority areas would be subject to traditional level of service criteria.

The current VMT guidelines are having a detrimental impact on the state's priority of developing new and affordable housing by imposing significant additional costs on new housing and other developments located outside of transit priority areas. Rural areas are at a particular disadvantage in that there is not enough known about the how implementation of VMT guidelines impacts the unique challenges and opportunities of developing in these communities. This includes fully understanding ways to accurately measure and mitigate induced VMT of different project types in these areas and a more realistic assessment of the limitations of existing transit systems, including reliability, flexibility, interconnection, cost for parking and fares, and health and safety issues faced by the travelling public.

Additionally, the VMT analysis should also appropriately recognize the ongoing transition from fossil fuels to electric and zero-emission vehicles. Recent updates to California energy codes are already making new housing much more sustainable. Rooftop solar is required on all new housing units, and the Governor has issued an Executive Order discontinuing the sale of fossil-fueled vehicles by 2035. New homes are already charging ZEVs from the solar panels on their roofs, a trend that will rapidly increase.

For these reasons, CALED is pleased to **Support** SB 1410. We agree that a level of service standard should be applied to development outside of transit priority areas.

Thank you for your consideration. Please feel free to contact me at 916-448-8252, with any questions.

Sincerely,

Gurbax Sahota
President & CEO

cc: Chair and Members Senate Environmental Quality Committee