



September 10, 2020

City of Santa Cruz Transportation & Public Works Commission

Dear Commissioners,

In 2013 the State passed SB 743 to correct a negative outcome of the CEQA process. As of July 1, 2020, the state's guidelines for implementing SB 743 are now a requirement for all cities and counties. Prior to July 1, Environmental Impact Reports used a metric of traffic delay, known as *Level of Service*, to determine a new project's impact on the transportation network. With the goal to reduce traffic delay, cities expanded roads and intersections. The State now recognizes that the old policy resulted in increased traffic, greenhouse gas emissions, and sprawl.

In June, the City of Santa Cruz made changes to its CEQA procedures in order to comply with SB 743. However, the City intends to continue to spend its funds on trying to mitigate Level of Service by expanding vehicle capacity at intersections. According to the staff agenda report, "Development projects triggering LOS impacts will be required to mitigate those impacts consistent with the City's current policy, except that the mitigation will no longer be CEQA mitigations."

This letter is a request that you recommend a new policy to the City Council that is more aligned with the spirit of SB 743. We request that the City direct its Traffic Impact Fees towards reducing Vehicle Miles Traveled, which is the metric identified by the State to determine a project's impact. In order to reduce VMT, we suggest that instead of expanding intersections, the City's transportation impact fees go towards encouraging mode shifts to walking, bicycling and transit.

We urge the City to do what it needs to do to comply with State legislation regarding developer fees, which requires a nexus between the fee and the project's impact. We note that the City of San Francisco's [Transportation Sustainability Fee](#) pays for:

- Transit improvements
- Bike infrastructure
- Sidewalks and pedestrian intersection improvements

There are no developer fees paying for projects to expand auto capacity.

[The City of Mountain View explains](#) why their developer fees do not go towards road expansion:

"Road widening is inconsistent with the City's General Plan policies due to limited space for additional right-of-way, increased crossing distances for pedestrians, induced demand, and other issues related to the City's desired future character."

Instead, Mountain View's developer fees pay for bike/ped bridges, a reversible bus lane, active transportation and transit improvements.

Our City has the best chance to achieve the Vision Zero goal of no serious injuries due to collisions by changing our policy. Stop funding auto expansion projects and redirect funds to making our streets safe for all users.

Thank you,

Bob Morgan  
Sierra Club

Gina Gallino Cole  
Bike Santa Cruz County

Rick Longinotti  
Campaign for Sustainable Transportation