

May 6, 2014

Chairman of the Board
Kern Council of Governments
1401 19th Street, Suite 300
Bakersfield, CA 93301

RE: Draft 2014 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Draft Program Environmental Impact Report (DPEIR)

Dear Honorable Chairman:

Our organizations represent the interests of the business community (Greater Bakersfield Chamber of Commerce), agriculture (Paramount Farms, Grimmway, Bolthouse, Kern County Farm Bureau), oil and gas companies (WSPA), realtors (Bakersfield Association of REALTORS®), and taxpayers (Kerntax, Kern Citizens for Sustainable Government) of our region and are united in our desire to ensure that the Kern COG Board considers the unique nature of our region as it reviews the 2014 Draft RTP/SCS and DPEIR. We are submitting this letter to express our thoughts on the RTP/SCS and DPEIR from the perspective on the impacts to business, the economy and the quality of life within Kern County. We believe the Kern COG Board should adopt the RTP/SCS and reject the alternatives analyzed in the DPEIR.

We recognize that the SCS is a requirement of Senate Bill 375 to reduce vehicle miles traveled from passenger vehicle and light duty truck travel by better coordinating transportation expenditures with the existing adopted general plans as the forecast for future development. We also recognize that this RTP must ensure attainment of our region's emission goals to ensure future transportation funding.

The Kern County economy is and has always been a resource economy with industries unlike other regions in the state of California. Kern is home to the largest producing oil industry in the state, second largest agricultural industry, the largest renewable energy producing industry and the home to the largest aerospace industry. In addition, the Kern County economy and population are projected to grow substantially over the coming two decades.

The SCS presented by Kern COG proposes to allocate the majority of projected future growth to existing communities and near existing and future planned job centers. We believe that this plan is a significant compromise between achieving the requirements of SB375 and the desires of our community. While it will result in changed growth patterns in Kern County, we support the Kern COG SCS for the following reasons:

- The SCS projects reasonably likely growth patterns for industry and allocates funding for necessary major infrastructure projects such as the Centennial Corridor and Westside Beltway to complete the regional transportation network necessary for our region to thrive.
- While it represents a change from traditional growth patterns in Kern County, the SCS preferred plan does incorporate the perspective of County and City general plans to ensure alignment and consistency with these important planning tools for our region developed through intensive community-level planning processes.

- The RTP proposes to substantially increase investment in transit infrastructure and alternative modes of transport, such as bikeways.
- The preferred plan represents a change from business as usual in how our region grows and how it provides for transport, Potentially resulting in some stress to our industries as they grow, after in-depth review, our business community recognizes that the SCS preferred plan strikes a compromise that addresses the projected needs of our region while ensuring compliance to obtain transportation funding and for that reason, we recommend adoption of the SCS.

While the SCS represents a compromise plan we can support, the alternatives presented in the DPEIR do not reflect the unique nature of our region and should be rejected for the following reasons:

- Alternatives 3 (Intensified), Alternative 4 (33% infill), and 5 (100% infill) would focus the majority or all of future growth on existing urban centers, stressing infrastructure that was not designed to handle such growth. These alternatives would increase density and development costs significantly, and destroying the unique character of our region, the quality of life and housing affordability that our residents enjoy. The congestion it would create would also cause our region to fail to meet reductions in air quality emissions required to obtain transportation funding.
- The major industries active in our region are land or resource based, by their nature requiring workers at dispersed locations throughout the region, and our economy could not function if future jobs and housing were required to be located only in existing urban cores.
- The other alternatives, including the no project alternative or no change alternative would not meet emission reduction requirements and would result in failure to obtain future transportation funding.

In addition, we share the following thoughts for the Board's consideration:

- We agree with and applaud Kern COG's acknowledgement that Kern COG does not have any authority over local land use plans or decisions, either under SB 375 (Government Code Section 65080(b)(2)(K)) or under any other law. We request that the mitigation measures stated in the RTP/SCS be revised to emphasize that local lead agencies (County and individual cities) will have complete control over requiring the suggested mitigation measures as they are related to implementation of their adopted general plans and other projects.
- It is important that the Introductory Mitigation Measures Section be revised to clarify that cities and the County are not required to change their land use plans and policies, including general plans, to be consistent with an RTP/SCS (Government Code Section 65080(b)(2)(K)).
- For industries within Kern County to continue to grow economically and provide job stability for the public, local general plans and jurisdiction should not be impeded.

For the above reasons, Kern COG should add language in the Final EIR that acknowledges that implementation of the advisory mitigation measures in the DPEIR are subject to the discretion of the local agencies and the final EIR should also acknowledge that local agencies undertaking project-specific analysis may utilize, amend, or reject recommended measures as appropriate to address the results of project-specific analysis. Following that, the Kern COG Transportation Planning and Policy Committee (TPPC) and Kern COG Board should confidently adopt the SCS/preferred plan as proposed and should reject all alternatives analyzed in the DPEIR as infeasible and inconsistent with regional goals.

We would like to thank you for the opportunity to submit these comment letter on behalf of the businesses and industries of Kern County.

Sincerely,



Cynthia D. Pollard
CHAMBER
GREATER BAKERSFIELD
CHAMBER OF COMMERCE



Nick Ortiz
WSPA
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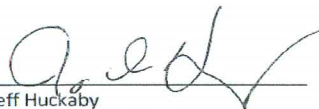
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