Subject: Public Comment on Draft CEQA Guideline Amendments

Thank you for extending the deadline for commenting on the above-referenced CEQA Amendments and for hosting a public workshop on January 26, 2009 in Sacramento. This email is a copy of a letter mailed today, January 26, 2009.

The East Bay Bicycle Coalition strongly supports your draft changes to the Transportation/Traffic section of the environmental factors checklist of Appendix G, as part of your charge under SB 97. Specifically, we support eliminating LOS and parking capacity analysis and instead focusing on the real environmental impacts of vehicle miles traveled. This change has long been needed and will allow cities to focus on sustainability by encouraging transit use, walking and bicycling, without solely focusing on outdated notions of maximum peak-hour traffic flow and parking supply.

Our projects, almost by definition, reduce the number of vehicle trips, by improving intersection designs for safer pedestrian crossings and adding bike lanes. Yet, we can’t get many needed projects implemented because of concerns about maintaining optimum traffic flow during that one peak hour during the day. This of course results in 23 hours of unsafe ped/bike access that could easily be provided without sacrificing any traffic capacity. The City of Oakland is literally shackled by such “vehicle focused” CEQA analysis, unable to make their city more walkable and bikeable, and thus more safe and livable. Your proposed changes are going to help a lot and in fact are consistent with Governor Schwarzenegger’s populist strategy to change California and his life-long interest in good health and fitness.

We encourage you to look for ways to solidify your laudable goal of shifting CEQA planning from LOS and parking supply to vehicle miles traveled. As one speaker said at public comments, some of the proposed revisions can be interpreted differently and that is not good for anyone. For this change it is essential to have clear guidance that cities are to shift focus away from LOS and parking.

Again, thank you for your good work on this important transportation-related CEQA issue. We look forward to the Natural Resources Agency’s formal rule-making process.

Sincerely,

Dave Campbell
Chair
East Bay Bicycle Coalition