



February 12, 2014

Ken Alex
Director
Governor's Office of Planning and Research
P.O. Box 3044
Sacramento, CA 95812-3044

Sent by email to CEQA.Guidelines@ceres.ca.gov

Dear Mr. Alex,

I'm writing to encourage your office's work to eliminate the use of automobile congestion as a measure of environmental significance throughout California. The California Bicycle Coalition strongly supports using a measure of "vehicle miles traveled" as a far superior way to analyze projects for environmental impact.

CalBike represents nearly 30,000 people, the aggregate dues-paying membership of our network of local bicycle advocacy organizations who share our mission of enabling more bicycling. Our goal is to triple bicycling by 2020 for safer, healthier, and more prosperous communities for all Californians.

The long-standing CEQA guidelines requiring analysis of automobile congestion, known as "automobile level of service" expressed in seconds of motor vehicle delay at intersections, has particularly vexed local planners and engineers who have had to declare the replacement of a traffic lane with a bicycle lane to be a bad thing for the environment. In fact, any urban planner whose goal is to make our streets more livable by slowing automobile traffic or to increase density to create more walkable neighborhoods had to deal with this incongruous "environmental" requirement.

Using vehicle miles traveled (VMT) as a measure makes much more sense. It will permit more accurate environmental analysis of development projects, indicating a greater impact by car-oriented fringe development than urban infill. It will also yield an appropriate analysis of a bicycle improvement project which is sure to reduce vehicle miles traveled even if it increases automobile congestion.

We look forward to working with local agencies to find ways to use a new VMT measure to ascertain appropriate fee levels on development projects and apply those fees to transportation improvements that improve mobility, safety, and health in our communities.

Sincerely,

A handwritten signature in black ink that reads "Dave Snyder". The signature is fluid and cursive, with the first name "Dave" being more prominent than the last name "Snyder".

Dave Snyder
Executive Director