

From: David Barboza
Sent: Sunday, August 10, 2014 5:36 PM
To: CEQA Guidelines
Subject: CEQA Guidelines Update - SB 743

To whom it may concern,

In light of the mandated changes to the CEQA Guidelines flowing from SB 743, vehicle miles traveled (VMT) per capita is the most appropriate method of determining whether a project has a significant transportation-related environmental impact. Dense, mixed-use projects and efforts to make investments in walking, cycling and public transit sometimes result in increased vehicle delay in specific areas, while simultaneously reducing per capita VMT, reducing the consumption of land, and using less water and energy than conventional low-density car-oriented development patterns.

The authors of SB 743 were quite right to prohibit the use of traffic delay as measured by metrics such as Level of Service (LOS) to define a significant effect on the environment for purposes of CEQA. This practice has had a number of perverse effects, such as making it more difficult to build housing and commercial space in a dense, mixed-use manner or to take away space in roads from cars in favor of dedicated transit corridors, bike lanes and wider sidewalks. Dense, mixed-use development and multi-modal transportation networks are less impactful on the environment than conventional sprawling and car-oriented development patterns, yet in a sad irony, the California Environmental Quality Act has historically placed barriers in the way of this more environmentally responsible development paradigm in the name of "environmental protection."

California should be making it easier to implement development practices that reduce greenhouse gas emissions, conserve land/water/energy and reduce reliance on cars. We can't make progress on this front until the CEQA Guidelines cast aside the badly flawed notion that equates protecting the environment with making it as easy as possible for as many cars as possible to drive as fast as possible.

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