

From: Lindell Price

Sent: Friday, November 21, 2014 10:50 PM

To: CEQA Guidelines

Subject: Comments on updates to the CEQA Guidelines Implementing Senate Bill 743 (Steinberg, 2013)

Since SB 743 supports promotion of public health through active transportation, health and safety impacts should be assessed accordingly, prioritizing the safety of vulnerable road users who are most at risk of injury in a traffic collision, and emphasizing the importance of pedestrian and bicycling circulation.

Active transportation works especially well for short trips that can be made conveniently at slower speeds. Implementation of SB 743 implies prioritizing short trips over long trips. Short trips can conveniently be made using active transportation, and if made by auto, the distance is short. Thus slower speeds for motor vehicles are appropriate, and facilitate the intent of SB 743.

p. 14, 1st paragraph

New Section 15064.3, subdivision (b)(2)

*Consider striking out the portion in red, "The addition of general purpose highway or arterial lanes may indicate a significant impact **except on rural roadways where the primary purpose is to improve safety and where speeds are not significantly altered.**" While safety improvements to rural roads should be encouraged, adding lanes to a rural road may induce travel. Additional lanes facilitate passing, so speeds are likely to increase even if an increase in speed is not the intent of the project.*

p. 14, near middle of page

New Section 15064.3, subdivision (b)(3)

(B) Contribute to queuing on freeway off-ramps where queues extend onto the mainline. *Take care that addressing freeway safety does not negatively impact local pedestrian and bicycle circulation. Pedestrians and bicyclists are at more risk of injury than occupants of motor vehicles. Address queues extending onto the freeway mainline with speed management on the freeway.*

(C) Contribute to speed differentials of greater than 15 miles per hour between adjacent travel lanes. *Add: Contribute to speed differentials of greater than 15 miles per hour between bicycles and motor vehicles.*

p. 14, near middle of page

New Section 15064.3, subdivision (b)(3)

Rather than using the average VMT, consider using the median VMT if the median VMT is lower than the average VMT. For jurisdictions such as El Dorado County with a regional transportation planning agency, El Dorado County Transportation Commission (EDCTC) within a metropolitan planning organization, Sacramento Area Council of Governments (SACOG), which VMT metric should be used? the VMT from the metropolitan planning organization? or the VMT from the regional transportation agency? I suggest using the lower VMT to better implement the intent of SB 743..

p. 20, near middle of page

Text of Proposed Amendments to Appendix G

c) Result in substantially unsafe conditions for pedestrians, bicyclists, transit users, motorists or other users of public rights of way by, among other things, increasing *motor vehicle* speeds, increasing exposure of bicyclists and pedestrians in vehicle conflict areas, etc.?

Note that increasing the speed of bicycle, pedestrian or transit travel can help reduce VMT, provided it does not create unsafe conditions for other users of public rights of way. Note that shared-use paths include inherent bicycle/pedestrian conflicts, and that bicycle travel is frequently slowed to pedestrian speeds. See the course materials for Caltrans "Understanding Bicycle Transportation" taught by Dan Gutierrez.

Thank you for the very good draft, and for the opportunity to provide comments.

Lindell Price