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Subject: Preliminary Draft CEQA Guideline Amendments

The Sacramento Area Bicycle Advocates (SABA) thanks you for the opportunity to make comments on the Draft CEQA Guidelines.

Section 15065

We recommend inclusion of additional guidance on thresholds of significance related to bicycle and pedestrian transportation. Projects that affect transportation safety, such as projects that result in increased vehicle speeds, vehicle volumes and street crossing distances, have a potential direct adverse impact on human beings. Bicyclists and pedestrians are especially vulnerable road users in the transportation mix and may suffer death or injury if margins of safety are reduced and risks of crashes increase. Higher vehicle speeds in particular have dramatic adverse consequences. Higher speeds result in less reaction time, making it more difficult to avoid crashes. When crashes occur, higher speeds significantly increase the severity of bodily injury and result in a much higher risk of death.

Appendix F

I. (2)

Recommend changing the phrase “decreasing reliance on natural gas and oil, and” to the phrase “decreasing reliance on fossil fuels, such as coal, natural gas and oil, and”

Coal is the fossil fuel that produces the highest level of GHG emissions, yet it is not mentioned.

II. D

Recommend adding as a mitigation measure “Minimizing transportation energy use by shifting trips made by modes consuming high levels of energy to modes that conserve energy such as human powered transportation: walking and bicycling.”

Bicycling is the most energy efficient form of land transportation.

Appendix G

XVI Transportation/Traffic

Recommend adding, “Would the project result in increased transportation safety risks for road users?”

We believe, as described above, that increased safety risks represent a substantial adverse impact on human beings. Safety risks are cited for air transportation in b, but safety is not more generally cited for road transportation. Some hazards related to design features, such as dangerous intersections and sharp curves, are mentioned in c., but these examples of hazardous design features falls short of covering all road safety risks.

We enthusiastically support the removal of questions related to level of service and parking capacity. These are not environmental issues. Their past use has been environmentally counterproductive since they have resulted in projects that encourage motor vehicle trips and fossil fuel use while at the same time discouraging trips by bike, foot and transit—all modes that use less energy and produce less air and water pollution, and in the case of bicycling and walking, less noise.

SABA is an award-winning nonprofit organization with more than 1,400 members. We represent bicyclists. Our aim is more and safer trips by bike. We're working for a future in which bicycling for

everyday transportation is common because it is safe, convenient and desirable. Bicycling is the healthiest, cleanest, cheapest, quietest, most energy efficient and least congesting form of transportation.

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