

**From:** Stanley Price

**Sent:** Friday, November 21, 2014 09:33 PM Pacific Standard Time

**To:** Chris Ganson

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

Proposed New Section 15064.3

Section (b)(2) Add to the end: "Induced Vehicle Travel for pedestrians, transit riders and bicyclists may be considered to have a less than significant transportation impact".

Section (b)(3) should replace "Local Safety" with Public Health.

Safety should be replaced with "public health". Public Health deals with chronic disease reduction and control, as well as costs to treat injuries, and provide "additional years of healthy life". For a study demonstrating this, I suggest you consult "Health Co-Benefits and Transportation-Related Reductions in Greenhouse Gas Emissions in the Bay Area", prepared by Neil Maizlish of the California Department of Public Health, November 11, 2011.

Any efforts to enhance the attractiveness of walking, taking transit, or bicycling due to an attractive and convenient travel network will encourage citizens to not drive a single passenger motor vehicle. Suggest an inventory of the surrounding 2 mile radius, and remedy gaps in alternative mode networks, particularly to the nearest park.

Section (b)(3)(C) Discusses a metric with speed differentials between adjacent travel lanes. Consider a metric concerning the difference in speed between different modes in proximity. (Examples are autos, 55mph, bicycles in bike lane 12 mph, difference 43 mph, with a factor of  $43/12 = 3.58$ , Bicycles and pedestrians sharing a multi-use path, 12 mph and 3 mph, factor  $9/3 = 3$ . These examples involve parties going in the same direction.

Section (b)(3)(F) An additional element to enhance livability in a neighborhood is to "create more short trips". Short trips are more likely to be taken with alternative modes, and reduce VMT.

Thank you for the opportunity to provide comments.

Stanley Price