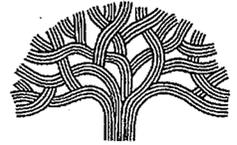


CITY OF OAKLAND



DALZIEL BUILDING • 250 FRANK H. OGAWA PLAZA, SUITE 4344 • OAKLAND, CALIFORNIA 94612-2033

Community and Economic Development Agency
Transportation Services Division

(510) 238-3466
FAX (510) 238-7415
TDD (510) 238-3254

August 27, 2009

Christopher Calfee, Special Counsel
ATTN: CEQA Guidelines
California Resources Agency
1017 L Street, #2223
Sacramento, CA 95814
CEQA.Rulemaking@resources.ca.gov

Re: 2009 Proposed Rulemaking regarding Amendments to the CEQA Guidelines

Dear Mr. Calfee:

The City of Oakland appreciates the opportunity to comment on the proposed amendments to the CEQA Guidelines from the Governor's Office of Planning and Research. We have three concerns regarding the amendments to Appendix G, Environmental Checklist Form, XVI. Transportation/Traffic:

- (1) *The revisions preserve an inappropriate emphasis on motor vehicle capacity.* Because of this focus, transportation analysis for CEQA review is dominated by motor vehicle level of service (LOS). Yet LOS is a measure of delay based on volume-to-capacity ratios. Delay is a social issue, not an environmental impact. As a capacity measure, LOS is not directly correlated with impacts to greenhouse gas emissions, air quality, or noise. **Replace references to the "capacity of the circulation system" with "effectiveness of the circulation system."**
- (2) *The revisions do not fully address the environmental impacts of vehicle miles traveled (VMT).* Unlike LOS, VMT is directly correlated with greenhouse gas emissions, air quality impacts, and noise. VMT is thus a more effective measure of environmental impacts than capacity measures like LOS. **Add a question to the Environmental Checklist Form that addresses increases in VMT.**
- (3) *The revisions do not address the necessary role of pedestrian, bicyclist, and transit modes in reducing the environmental impacts of future growth.* In fact, the proposed revisions would continue to marginalize these modes by emphasizing motor vehicle capacity as the primary transportation consideration in CEQA review. **Add a question to the Environmental Checklist Form that addresses safety and access for pedestrians, bicyclists, and transit riders.**



We also have two editorial comments regarding the amendments to Appendix G, Environmental Checklist Form, XVI. Transportation/Traffic:

- (a) Under Transportation/Traffic (XVIa), replace the reference to "bicycle paths" with "bikeways." A bicycle path is only one type of bicycle facility. "Bikeway" is an inclusive term that encompasses bicycle paths, bicycle lanes, and bicycle routes – all components of the transportation system. "Bikeway" is defined by Section 890.4 of the California Streets and Highways Code.
- (b) Under Transportation/Traffic (XVIg), delete "(e.g., bus turnouts, bicycle racks)." These are poor examples that do not reflect the wealth of important policies, plans, and programs promoting alternative transportation at the state and local levels.

Sincerely,



Iris Starr, AICP
Senior Transportation Planner
And



Jason Patton, PhD
Bicycle and Pedestrian Program Manager

cc: Dennis Fay, Alameda County Congestion Management Agency