August 27, 2009

Christopher Calfee, Special Counsel
California Resources Agency
1017 L Street, #2223
Sacramento, CA 95814

Via email to CEQA.Rulemaking@resources.ca.gov

RE: Proposed Amendments to the California Environmental Quality Act (CEQA) Guidelines

Dear Mr. Calfee:

*WALK*Sacramento appreciates the opportunity to comment on the proposed amendments to the CEQA guidelines. We value the CEQA review of projects for their environmental impacts, particularly the impacts on the natural and built environments in which people walk and bike.

WALKSacramento encourages people to walk and bicycle in their communities. The benefits include improved physical fitness, less motor vehicle traffic congestion, better air quality and a stronger sense of cohesion and safety in local neighborhoods. WALKSacramento is a member of the Partnership for Active Communities, formerly the Safe Routes Sacramento Partnership. The Partnership is working to support increased physical activity such as walking and bicycling in local neighborhoods as well as helping to create community environments that support walking and bicycling.

§ 15126.4. (c) (2) Reductions in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F;

WALKSacramento supports this addition to the section *Consideration and Discussion of Mitigation Measures Proposed to Minimize Significant Effects*. The California Natural Resources Agency included in its *Initial Statement of Reasons for Regulatory Action* the statement that "according to the California Energy Commission, "[r]esearch shows that increasing a community's density and its accessibility to jobs centers are the two most significant factors for reducing vehicle miles traveled". Not only can VMT be reduced due to shorter trips, but the opportunities and facilities for people to walk or bike to work can be increased.

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Appendix G Environmental Checklist Form

XVI Transportation/Traffic – Would the project:

a) ~~Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?~~ Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

This revision takes a huge step in the right direction towards recognizing the impacts projects can have on non-motorized modes of transportation. Measures of effectiveness can take various forms, such as level of service (whether intersection- and/or segment-based Pedestrian LOS, Bicycles LOS, Transit LOS, Multimodal LOS, or the frequently used (Vehicle) LOS), Traffic Intrusion on Residential Environments (TIRE), automobile trips generated (ATG), and vehicle miles traveled (VMT).

Subdivision (c) of section 15064.7. Thresholds of Significance states that a "threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect". The Note on the first page of the Environmental Checklist Form states that the "sample questions in this form are intended to encourage thoughtful assessment of impacts". Since capacity is not the only accepted and applied measure of effectiveness, the question would be more effective if it did not highlight measurement of capacity.

*WALK*Sacramento recommends the wording of question XVI a) be changed to:

a) ~~Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?~~ ~~Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness~~ Result in inadequate performance (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian facilities, ~~and bicycle paths~~ bikeways, and mass transit?

Note that we have included in our recommended revisions the addition of the word "not", and we have also replaced "pedestrian and bicycle paths" with "pedestrian facilities" and "bikeways".

The transportation-related impact of a project is not only to the effectiveness of the circulation system. Safety is an important consideration in the review of transportation impacts. Improving the vehicle LOS of a roadway is sometimes

accomplished with higher vehicle speeds and/or wider roadways, but a negative result can be a greater number of vehicle-pedestrian collisions and increased severity of pedestrian injuries.

*WALK*Sacramento recommends revising question d) as follows:

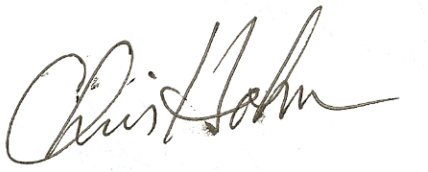
> d) Substantially increase hazards to any user of a street, highway, pedestrian facility, or bikeway due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Appendix F Energy Conservation.

*WALK*Sacramento supports the recommendation made by the Sacramento Area Bicycle Advocates (SABA) to add to Appendix F II. D. the following as a mitigation measure for EIR's: "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."

Thank you for your consideration of these comments and recommendations.

Sincerely,



Chris Holm
Project Analyst

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