

From: Cindy van Empel, MA, AICP
Organization: Public
Date Received: November 22, 2009

Subject: CEQA Guidelines, background for GHG

Dear Mr. Calfee:

Prior to the comment deadline, I reviewed the Resources Agency's proposed CEQA Guidelines amendments pursuant to SB 97. Your draft revisions looked very good and I decided against commenting on some minor changes I might have preferred.

Subsequently, I reviewed online the comments made by other agencies, groups, and individuals and was pleased at the generally positive responses. However, I am concerned with comments made by Caltrans and Fox Strategies, LLC, and felt it necessary to provide some data that supports your draft amendments, as published for comment.

As I am sure you are aware, there is a growing body of evidence that refutes the hypothesis that congestion can be relieved through the construction of new facilities or new capacity. Rather, research and empirical evidence are demonstrating that new roadway facilities increase Vehicle Miles Traveled and trips, as well as inducing new growth along the new roadway and several miles from its end. Similarly, new capacity on existing facilities attracts new automobile trips and increases VMT.

As has been amply demonstrated by the Air Resources Board, trips made by vehicles with internal combustion engines of all types, but passenger vehicles in particular, are responsible for an increasing share of greenhouses gases, as VMT per capita has increased and development densities have decreased. This is no more true than in areas that have built new roads and new roadway capacity.

Even some Caltrans districts have recognized induced travel, although the entire agency does not yet acknowledge it. In a National Public Radio (KQED) interview regarding the widening of the SR 24/I 680 interchange as the new interchange was about to open, a District 4 official noted that capacity projects, such as the interchange, often take 10 years or more to plan and build, but only five years to reach the level of congestion that existed prior to the capacity increase.

For research on this subject, I would refer you to ULI's book, *Growing Cooler: the evidence on urban development and climate change*, by Reid Ewing, Keith Bartholomew, Steve Winkelman, Jerry Walters, Don Chen, et al, published in 2008. Chapter 6: Induced Traffic and Induced Development, pp 99-105. References, page 166. And Chapter 8: The Combined Effect of Compact Development, Transportation Investments, and Road Pricing, pp. 113-127. Notes page 158. References pp 167-168.

Additionally, Fox Strategy, LLC's comments requests that the subject of parking be added back to Appendix G. While it is, of course, a sample form, Appendix G's very inclusion in the Guidelines has made the subject matter in it fodder for suit. Agencies that recognize the travel-inducing impacts of ample parking have been compelled to defend their reasons for excluding parking from environmental review. Donald Shoup's book, *The High Cost of Free Parking*, published in 2005, examines the economic and physical impacts of providing parking, particularly when it is offered free or at less-than-market prices.

Appendix G doesn't differentiate between free and market-rate parking, but the practice of providing parking has been to create enough supply for the busiest business day, particularly for retailers. The result has been that parking is essentially unconstrained for users, which has the minimum effect of not discouraging driving. Discouraging driving is precisely what is called for by AB 32 and SB 375, so the parking "impact" question in Appendix G should either be eliminated or very severely modified to reflect the need to reduce automobile use.

Finally, a small note. As I was reviewing the statutory exemptions recently, I noticed an exemption for restriping a roadway to add capacity. This exemption seems to flout the purpose of AB 32 and SB 375. I believe it is located at Guidelines Section 15282(j); you may wish to reconsider this exemption or amend it to allow restriping for the addition of non-automobile transportation capacity.