

Name: Jennifer Klausner, Executive Director
Organization: Los Angeles County Bicycle Coalition
Date Received: November 3, 2009

Re: revised text of the proposed amendments to the State CEQA

Guidelines (Proposed Amendments) described in a Notice of Proposed Amendments dated July 3, 2009

Dear Mr. Calfee:

On behalf of the members of the Los Angeles County Bicycle Coalition, I am writing to express our support for the proposed modifications to the CEQA Guidelines checklist ("Appendix G") recommended by The Natural Resources Agency in the revised text of the Proposed Guidelines Amendments described in the document Text_of_Proposed_Changes.pdf, found at http://ceres.ca.gov/ceqa/docs/Text_of_Proposed_Changes.pdf

Transportation impact analysis under current CEQA practice frequently prioritizes automobile level of service to the detriment of other modes. This narrow lens has resulted in numerous projects that exacerbate the development of transportation alternatives, ultimately increasing the negative environmental impacts of automobile use.

We strongly support the proposed changes to checklist items XVI, Transportation/Traffic, a) and g), that call for consideration of the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and all relevant components of the circulation system.

We also strongly support the revision of checklist item XVI f) that eliminates this guideline about the impact on parking capacity. Experience has shown that the widespread provision of convenient parking often encourages unnecessary automobile use, thereby increasing negative environmental impacts. Judicious management of parking supply is a powerful tool for transportation demand management that should not be constrained by CEQA analysis.

While we strongly support the adoption of these revisions, we also encourage additional changes to CEQA guidelines to minimize the unintended consequences of pursuing congestion relief as a strategy for minimizing environmental impacts. Decades of pursuing this approach have only abetted increased growth in automobile use and held back the development of environmentally friendly transportation alternatives. Surely this runs counter to the intended purpose of CEQA.

Sincerely,

Jennifer Klausner, Executive Director