

**Name: Walt Seifert, Executive Director**  
**Organization: Sacramento Area Bicycle Advocates**  
**Date Received: November 4, 2009**

**Subject: Comments on revised proposed CEQA Guidelines Amendments**

The Sacramento Area Bicycle Advocates appreciates the proposed amendment of the Appendix G Transportation/Traffic sample question f to add safety and performance considerations. We believe this is a significant advance in recognizing the environmental impacts of motorized traffic.

We do have suggestions for improving the language in the question. We recommend that the language be consistent with the intent of California Complete Streets legislation. We believe that motorists' safety may have been unintentionally excluded from consideration as an environmental impact. We believe some wording is unclear.

The proposed question reads in the new draft is as follows:

~~g~~f) Conflict with adopted policies, plans, or programs **regarding public transit, bikeways, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities supporting alternative transportation (e.g., bus turnouts, bicycle racks?**

Signed in 2008, AB 1358, the "Complete Streets" Act is now law in California. Though it applies to general plans and not to the CEQA guidelines, we believe consistency between the Complete Streets general plan guidelines (currently being developed by the Office of Planning and Research) and CEQA guidelines is highly desirable. One of the strengths of complete streets ideas is that it applies to the safety and convenience of all road users, including motorists. While pedestrians and bicyclists are disproportionately the victims of traffic crashes, most victims of traffic crashes are vehicle drivers and passengers. Traffic crashes adversely impact motorists. Therefore, we believe the sample questions should either specifically address motorists' safety or use some umbrella term that includes motorists such as "all road users."

We think the term "performance" is unclear and may be difficult to define and apply in practice. We suggest it be deleted or replaced by a more specific term or terms such as convenience and desirability.

Here is a recommendation for a revised question:

f) Conflict with adopted policies, plans, or programs regarding public transit, roads, bikeways, or pedestrian facilities, or otherwise substantially decrease the convenience and desirability of such facilities for transit users, bicyclists or pedestrians or decrease the safety of road users.

This adds roads to the list of facility categories and covers the safety of all road users, including motorists.

We note that this question implies that there is an acceptable background level of deaths and injuries due to traffic crashes. Projects would have to decrease safety from this background level in order to be considered as having an impact. We are concerned about this implication. The Vision Zero program in Sweden has made protecting human life the highest road transportation priority. It sets a goal of no fatalities or serious injuries due to traffic crashes. “Vision Zero is conceived from the ethical base that it can never be acceptable that people can be killed or seriously injured when moving within the road transport system.”

We believe that any project that creates new traffic safety risks has an environmental impact since traffic injuries and fatalities adversely affect human beings. We reiterate our earlier suggestion of a question such as “Would the project result in increased risks of injuries and fatalities from traffic crashes for road users?”

Thanks for considering our comments and your work in creating the proposed draft. A California that makes bicycling, walking and transit use safer, more convenient and desirable will reduce greenhouse gas emissions and will make Californians healthier.