

## Letter 74

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### **Comment 74-1**

Commenter supports amendment to Section 15126.4 (c)(2) and states the advantages of reducing VMT results in shorted trips but also allows for opportunities and facilities for people to walk or bike.

### **Response 74-1**

The Natural Resources Agency notes the commenter's support.

### **Comment 74-2**

Commenter supports amendment to Appendix G: Transportation/Traffic question (a), in that it establishes the right direction towards recognizing impacts projects can have on non-motorized modes of transportation.

### **Response 74-2**

The Natural Resources Agency notes the commenter's support to Appendix X, Section XVI question (a). The revised question recognizes the discretion of local agencies to designate appropriate performance measures. As the comment does not seek any additional changes to the text, no further response is required.

### **Comment 74-3**

The word "capacity" should be removed from the Transportation/Traffic section.

### **Response 74-3**

In response to comments similar to this, the Natural Resources Agency further revised Appendix G, Section XVI question (a) to provide greater latitude of choices for performance standards. As explained in the Notice of Proposed Changes, the revised text "would refocus the question from the capacity of the circulation system to the performance of the circulation system as indicated in an applicable plan or

ordinance.” The Natural Resources Agency finds that the revised text responds to the concerns raised in this comment, and no further revision is required.

**Comment 74-4**

Revise Appendix G: Transportation/Traffic question (a) to require consideration of performance of the circulation system.

**Response 74-4**

In response to comments such as this, the Natural Resources Agency further revised Appendix G, section XVI question (a). Specifically, the revisions refocus an analysis from an increase in traffic at a given location to the effect of a project on the overall circulation system in the project area. Specifically, the revisions recognize that the lead agency has discretion to choose its own metric of analysis of impacts to intersections, streets, highways and freeways. (Pub. Resources Code, § 21081.2(e); *Eureka Citizens for Responsible Government v. City of Eureka*, (2007) 147 Cal.App.4th 357, 371-373 (lead agency has discretion to choose its methodology).)

**Comment 74-5**

Replace the phrase “pedestrian and bicycle paths” with “pedestrian facilities and bikeways” in Appendix G: Transportation/Traffic question (a).

**Response 74-5**

See Response 42-2. Revisions to Appendix G, Section XVI refocus question (a) to allow consideration of the circulation system as a whole, which includes the pedestrian and bicycle infrastructure. The commenter’s suggestion would not provide more clarity to lead agencies when assessing potential impacts. The Natural Resources Agency, therefore, rejects this comment.

**Comment 74-6**

Commenter suggests Appendix G to consider the effectiveness of a circulation system in the context of the safety of the transportation system. The commenter notes that sometimes LOS is used to expand roadways which allows for higher vehicle speeds, to the detriment of bicyclists and pedestrians.

**Response 74-6**

In response to comments similar to this, the Natural Resources Agency further revised Appendix G, Section XVI to refocus the analysis of transportation impacts in the context of the performance and safety as a whole. See Response 74-4 for additional discussion.

Additionally, the Natural Resources Agency further revised now checklist question (f). The question now provides: “(would the project) 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?” The Natural Resources Agency this revision sufficiently addresses the commenter’s concern of the safety of a transportation system.

**Comment 74-7**

Commenter suggests revising Appendix G: Transportation/Traffic question (d) to address increased hazards to anyone using the circulation system.

**Response 74-7**

See Response 74-6. The Natural Resources Agency further revised now checklist question (f). The question now provides: “(would the project) 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?” The Natural Resources Agency this revision sufficiently addresses the commenter’s concern of the safety of a transportation system.

**Comment 74-8**

Commenter suggests revision to Appendix F (II)(D) to specify that minimizing transportation energy use by shifting trips and mode choice as allowable mitigation measures for EIR’s. Specifically, designating walking and bicycling as appropriate mitigation for impacts to transportation energy.

**Response 74-8**

Appendix F, Section (II)(D) lists mitigation measures that a lead agency may consider to reduce a project’s potential energy impacts. In general, Appendix F is similar to Appendix G in that its purpose is to provoke thoughtful considerations of general energy concerns. First, the mitigation measures listed in this section are not exclusive and lead agencies may consider other measures that reduce a project’s energy consumption. Second, the list already provides a lead agency to consider energy consumption as it relates to transportation. (Section (II)(D)(2).) No further revision to the text is required to respond to this comment.