

Lockey, Heather@CNRA

From: Benjamin Steele <bcsteele1@gmail.com>
Sent: Wednesday, March 14, 2018 9:45 PM
To: CEQA Guidelines@CNRA
Subject: Public comment for 01/26/2018 CEQA Notice of Proposed Rulemaking

Benjamin Steele
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Dear Mr. Calfee (California Natural Resources Agency),

By continuing to allow roadway projects to avoid VMT metric considerations, these proposed changes to CEQA drastically undermine California's climate goals, natural environment, and commitment to sustainability; rather, unlimited public funds will continue to be put toward level of service "improvements" that empirically fail to alleviate (and often exacerbate) existing traffic congestion through willful ignorance of induced demand, that add noise and air pollution to our cities' poorest neighborhoods, and that facilitate (and are in turn justified by) unending sprawl into sensitive greenfield sites instead of urban infill development for our growing population. These projects come at a staggering human cost - no traffic analysis considers the ever-rising count of drivers, cyclists, and pedestrians maimed and killed with rising speeds and the endless demands for more automobiles on our roads; no traffic analysis considers the families displaced for the latest futile round of freeway widening; no traffic analysis is willing to grapple with the reality of a generation condemned to waste their lives behind the wheel on endless, pointless commutes that are somehow never quite solved through the next interchange redesign, invariably made at staggering public expense.

Though global warming represents an existential threat to California's natural spaces and built environments alike, CEQA will still mandate open-ended polluting investments into California's largest (and still-growing) contribution to the carbon emissions crisis: transportation. At some level, I believe this agency has an awareness that the CEQA status quo cannot be justified on through cost-benefit analysis, and that CEQA's reality has become a perversion, even subversion, of its ostensible intent. I urge this agency in the strongest possible terms to subject roadway projects to VMT analysis as it originally proposed. Your past guidelines legally locked the state into furthering 1970's priorities for a full generation, no matter the cost - let's not do the same for our next generation.

Sincerely,
Benjamin Steele