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November 17, 2003

Ms. Jennifer Lawrence, Principal Planner
Capital Projects
UC Berkeley, Environmental & Long Range Planning
1936 University Ave.
Berkeley, CA 94720

Re: Public Comment of Notice of Preparation Environmental Impact Report: UC Berkeley 2020
Long Range Development Plan and Chang-Lin Tien Center for East Asian Studies

Dear Ms. Lawrence:

Representatives of the Bicycle-Friendly Berkeley Coalition have reviewed the Notice of Preparation Environmental Impact Report: UC Berkeley 2020 Long Range Development Plan and Chang-Lin Tien Center for East Asian Studies (herein "LRDP") and, pursuant to the public input process of the California Environmental Quality Act, provide the following comments. For your information, the Bicycle-Friendly Berkeley Coalition is a volunteer-run, member-supported, non-profit organization of bicycling enthusiasts in the Berkeley area and our mission is to improve safety and access for bicyclists. We represent hundreds of cyclists in the Berkeley community.

First, we applaud UC Berkeley for its continuing commitment to provide the necessary facilities and growth for the University to maintain its position as a leading center for advanced research. In connection with this, we understand that the University has to plan for future land use and physical development. We also understand that this growth will have an impact on our community and we appreciate every effort the University can continue to make to minimize these impacts.

Regarding future growth of UC Berkeley, we are extremely concerned that such growth will cause an increase in traffic in our community, and in particular, that such traffic increases will negatively affect the safety and access of bicyclists and pedestrians, both on campus and throughout the City of Berkeley. With regard to this, we comment on two aspects of the Initial Study of the LRDP.

First, section 12, Transportation and Traffic, part (d) the Initial Study states that “the EIR will evaluate the potential for future changes to the campus circulation system or development of incompatible uses to increase hazards to traffic, pedestrians or bicyclists.” We strongly feel that such a limited scope of safety analysis is legally inadequate under CEQA. We request that UC Berkeley broaden its study and analysis of bicycle and pedestrian safety to include a full study of the overall safety and access impacts resulting from increased vehicular traffic on local streets. Such an analysis is the same type of in-depth analysis that the is required under section 12(a) for impacts to vehicular traffic. We request that a similar analysis be made for impacts to the safety of bicyclists and pedestrians.

According to SWITRS data from the years 1994-1998, Berkeley has more than “... four times the rate of bicycle injury compared with the State of California” and in comparison to 44 cities of a similar size in the State of California, “Berkeley ranks number one in both pedestrian and bicycling injury and death.”¹ Of particular concern is the fact that bicyclists 10-17 years old are involved in collisions at more than twice the rate of any other age group. In addition, Berkeley, has the highest bicycle injury rates as a percent of total collision injuries in the county.²

According to the Office of Traffic Safety collision data, Berkeley has the highest bicycle collision rates per capita in Alameda County.³ The City of Berkeley is ranked No. 1 in its population group for bicycle collision rates for cities, both by VMT and by population.⁴ Berkeley’s high bicycle collision ranking is even more alarming when one considers the unusually large number of bicyclists in that city.⁵

In addition, the SWITRS data show that the majority of bicycle and pedestrian crashes in Berkeley occur in the vicinity of UC Berkeley’s campus.

Expansion and growth of UC Berkeley will only exacerbate a serious lack of bicycle and pedestrian safety on the busy streets of our city. Because of this, UC Berkeley has a heightened obligation and responsibility to ensure that a full study is conducted of the additional negative impacts to bicycle and

¹ City of Berkeley Bicycle and Pedestrian Safety Task Force *Evaluation and Recommendations*, 2000 (pg. 4)

² (Berkeley 14% and Alameda 10.1%: County average of 5.1%) Alameda Countywide Bicycle Plan, adopted 2001(Appendix B-4, Table 6, 1998 data).

³ (Berkeley 1.66/1000 pop.; Emeryville 0.57/1000 pop. and Alameda 0.49/1000 pop.; state average 0.39/1000 pop.) Alameda Countywide Bicycle Plan (pg. 2-27).

⁴ Id.

⁵ (4,000 people bike to work everyday in Berkeley, 4.9%; county average 1.3%), Berkeley Bicycle Plan, adopted 2000 (pgs. 1-1 to 1-3, 1990 Census data).

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pedestrian safety and that all steps are taken to minimize these traffic safety impacts. For this, and as our second point of comment, the EIR should include a study of an alternative to the project that includes a comprehensive Transportation Demand Management program, as called for in the TDM Study of 2000 conducted jointly by UC Berkeley and the City of Berkeley. The University needs to substantially reduce the number of car trips to campus made by faculty and staff.

Growth of the University is important, but unplanned, uncontrolled and unmitigated growth is not. Our community needs more trips by bike and by walking. The University needs to do more, a lot more in this regard.

Thank you for your consideration.

Sincerely,

Dave Campbell
President