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Joyce Horizumi, Environmental Coordinator  
Sacramento County Department of Environmental Review and Assessment  
827 7<sup>th</sup> Street, Room 220 Sacramento, CA 95814

Via email to [DERA@saccounty.net](mailto:DERA@saccounty.net)

**RE: Draft Environmental Impact Report for the Sacramento County General Plan Update**

Dear Ms. Horizumi:

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Sacramento County General Plan Update.

We appreciate the extensive work that has gone into the DEIR and we appreciate the facts and findings that have assisted us in our analysis. Laying out the impacts helped us to see the significant disconnect between the policies of the Circulation Element of the Draft General Plan and its ineffectiveness in implementing its key objectives. Additionally, our re-review of the goals and policies of the Circulation Element led us to conclude that the General Plan has significant impacts on pedestrians and bicyclists. Additionally, we find that the analysis of the DEIR is inadequate and that additionally, the County's chosen analytic procedures related to transportation impacts are inadequate.

The quantification analysis focuses entirely on driver or motor vehicle Level of Service (LOS) just barely mentioning and not quantifying the impacts on bicycle and pedestrian accessibility or Level of Service.

Something is wrong. The Plan seeks to achieve greater transportation choice yet the DEIR analysis indicates worsening outcomes in transportation choices. There is no improvement in walk/bike mode share and even a slight decrease (see Table TC-8, p9-36). VMT per household stays virtually the same. Transit mode share stays the same. Yet the percent of households within ½ mile of transit declines significantly.

This led us to question why does this Plan, which speaks eloquently to Complete Streets and walkability and bikeability, fall so short?

A partial answer is found on Table TC-14 which lists all the major roadways in the County, their current status and their projected ultimate design. We were surprised and aghast at the number of major roadway widenings in the Plan. Clearly the mode of choice continues to be the automobile.

The explicit list of major roadways only noted in the Plan's Circulation Element by a very difficult to read one-page map, tells us some of the problem. With just a few exceptions, the Plan continues the widenings of the 1993 General Plan. The Plan appears to propose no changes to the County's system of roadways. A much finer grid (1/8 mile or less) is needed to get a significant shift to walking and bicycling. This lack of a fine roadway grid is reflected, as well, in the draft Land Use Plan which appears to leave the transportation system within the mile grid to the developer to decide. What then results is the continuation of mile square islands of land use with difficult, unsafe, and inconvenient connections for pedestrians and bicyclists – a recipe for continued unwalkability and unbikability.

Our more detailed comments on the DEIR are as follows:

#### 1. Level of Service ANALYSIS IS INADEQUATE

The significance criteria for the transportation impact analysis of the General Plan Update include roadway segments, bicycle and pedestrian facilities, safety, the freeway system, and transit. These criteria are interrelated and should be balanced and integrated to provide the most efficient and beneficial transportation system.

The criterion used in the General Plan Update for roadway segments is Level of Service (LOS); perhaps more appropriately called DRIVER OR MOTOR VEHICLE level of service. The LOS used by the County does not accurately reflect the operation of the transportation system which serves the movement of people and goods not only in motor vehicles (primarily automobiles on most County roads), but also people on foot, bikes, and transit. The DEIR states on page 9-51 that measures to mitigate the impacts of LOS deficiencies, delay, and congestion should be multi-modal. Pedestrian and bicycle facilities are among the variety of improvements identified for mitigation measures. How will the effectiveness of these mitigations be known when only vehicular LOS is measured?

- To provide for a more balanced and integrated transportation system and to mitigate the impacts of the project on roadway operating conditions, multi-modal LOS for roadway intersections and segments should be incorporated in the General Plan Update and DEIR.

#### 2. Vehicle Miles Traveled ANALYSIS INDICATES NO PLAN BENEFITS

The introduction to the Circulation Element in the General Plan Update states that the main theme is to provide mobility through choices. The PLAN NOTES THAT AN integrated and balanced transportation system requires investment in not only the roadway and transit system, but also substantial investment in bicycling and pedestrian modes of travel. Section 3, Transportation Policy Plan, of the Circulation Element begins with a discussion of the benefits of greater mobility. **Reduced vehicles mile traveled (VMT) and increased physical activity of residents**

through more appealing and plentiful walking and biking opportunities are identified as two of the beneficial external impacts of a balanced transportation system.

The goal for roadways in the Circulation Element is to "provide a balanced and integrated system that maximizes the mobility of people and goods in a safe and efficient manner". Chapter 9, Transportation and Circulation, Overview of Impacts, Systemwide Transportation Performance (p. 9-34), states that the proposed General Plan would have the greatest increase in VMT compared to no project. If a decrease in VMT is a beneficial impact to a balanced transportation performance, then wouldn't an increase to VMT be a negative impact?

- To help mitigate the impact to the transportation system, we suggest adding the following policy statement to the Circulation Element that expresses the following: The County should plan and design the transportation system and expansions to the roadway system in a manner that reduces VMT.

### 3. Bikeways

Impact: Bicycle and Pedestrian Facilities – Proposed Project (page 9-58) states that the General Plan Update includes policies for bicycle facilities, that smart growth principles will ensure bicycle mobility in new growth areas, that the County's plans to improve bicycle facilities will provide connectivity, and that the provision of appropriate bicycle facilities will assist in a mode shift helping to mitigate LOS deficiencies, delay, and congestion. The text goes on to say the project impact is less than significant. However, in the Environmental Setting discussion of Bikeways (page 9-8), it is stated that "it appears that the County will not meet its" 2010 Bikeway Master Plan" goals for construction of on-street and off-street bicycle facilities." We question the conclusion that the project impact to bikeways is less than significant.

- Updated Bikeway Master Plan construction goals should be specified and used to analyze the Project impacts to bikeways.

### 4. Road Widenings ANALYSIS IS INADEQUATE

The DEIR identifies roadway widening as a mitigation measure for impacts caused by the increase in traffic volumes in unincorporated Sacramento County and other jurisdictions. The discussion of Roadway Widenings on page 9-51 mentions that sections of White Rock Road, Kiefer Boulevard, and Excelsior Road should be widened from four lanes to six. Table TC-14, Appendix D pp. 39-49, lists about 380 roadway segments with current and projected daily traffic volumes. About 178, or close to half of those segments listed, are proposed to be widened from their current width to four or six lanes for the proposed project.

The DEIR provides no quantification of the impact of these widenings on pedestrian or bicyclists and yet it is well established that roadway widenings have serious impacts on pedestrians and bicyclists in the following ways:

- Increase the distance that pedestrians have to walk to cross the street

- Increase vehicle speeds at most hours of the day. Vehicle speeds above 35 mph are inhospitable to both pedestrians and bicyclists. Collisions with vehicles at these speeds are generally fatal for bicyclists and pedestrians, and roadways with these speeds discourage bicyclists and pedestrians.
- Increase the waiting time for pedestrians to cross the street by increasing the intersection delay times.

Well over half of the proposed road widenings in the proposed Plan may not be needed. Having them in the Plan provides a built in bias toward motor vehicles by designating them for future widening. This impacts the future in at least two ways. First, this supports piecemeal implementation favoring road widening. As development occurs, developers are required to provide and sometimes build to the future plan designation. This results in the “saw tooth” look of roadways in which portions are narrow and other portions overly wide. Second, having the designation in the plan provides the community with the implied intention of road widening giving significant advantage to the widening option and preventing an unbiased analysis of all options.

Current efforts to rethink and retrofit communities to increase walkability and bikability have developed an approach to reduce the width and lanes of roadways. This approach called “Road Diet” re-engineers roads to better serve pedestrians and bicyclists while still meeting the needs of drivers. Generally, the safety is improved for all users by reducing the speeds and conflicts.

Four-lane roadways with between 12,000 and 18,000 ADT are excellent candidates for road diets, and those with between 19,000 and 25,000 ADT are potential candidates (Burden<sup>1</sup>). Six-lane roadways with less than 30,000 ADT are excellent candidates for road diets (LaPlante<sup>2</sup>).

109 of the 380 roadway segments listed in Table TC-14 would be excellent or potential candidates for road diets at the widths proposed in the DEIR. These roads have not been widened, yet, and it would be best not to build these 109 roadway segments at widths we would recommend for lane reductions.

If the draft Plan were revised to provide greater flexibility in future roadway width, the impacts on pedestrians and bicyclists would be reduced.

We propose the following analysis and mitigation recommendations:

- Analyze the impacts of roadway widenings on:
  - 1) Increased distance for pedestrian street crossings

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<sup>1</sup> Dan Burden & Peter Lagerway, “Road Diets – Fixing the Big Roads”, March 1999, <http://www.walkable.org/assets/downloads/roaddiets.pdf>

<sup>2</sup> John LaPlante, P.E., PTOE, Vice President/Director of Traffic Engineering, T.Y. Lin International, Chicago, IL, personal communication May 21, 2009

- 2) Increased time for pedestrian street crossings – both time to cross the street and time waiting to cross the street.
  - 3) Increased speeds during the peak and off peak as a result of increased vehicular capacity.
  - 4) Impact on pedestrian injury and fatality rates.
  - 5) Pedestrian Level of Service and Bicycle Level of Service using the latest methods for these LOS.
- Mitigate the negative impacts of the roadway widenings by assuring that before any widening take place it is truly necessary and beneficial. As part of the preparation of the Final EIR, request a re-review of all proposed roadway widenings by the County's Department of Transportation and revise the draft Plan as follows:
    - 1) Include a complete list of all road segments as noted in Table TC-14 in the Circulation Element of the General Plan.
    - 2) Redesignate the proposed 4-lane widenings for roads with projected ADT of 18,000 ADT or less as 2- to 3-lane roadways in the list of road segments.
    - 3) Redesignate the proposed 4-lane widenings for roads with projected ADT of 25,000 or less as potentially 2- to 4-lane roadways.
    - 4) Redesignate the proposed 6-lane road widenings for roads with projected ADT of 30,000 or less as potentially 2- to 4-lane roadways.
    - 5) Redesignate all other proposed widenings as "potential" widenings from the existing width that will be dependent on a Department of Transportation/public process.
    - 6) Establish a multi-step transportation project planning process that begins with consideration of all modes for a specific roadway segment and in which all modes are considered equally. The Charlotte, North Carolina 6-step planning process is one such approach.

5. Smart Growth Streets as mitigation needs clear analysis and greater specificity.

The Smart Growth discussion (pp. 53-54) in Chapter 9 states that the County should adopt an overall mobility standard. It is also recommended that the "Smart Growth Streets" policy document be adopted as mitigation or that similar measures be adopted. We believe that the Smart Growth Streets approach is promising but that it needs greater clarity and a analytic method for determining its potential impacts.

It is unclear if implementation measures of the Smart Growth Streets policy were included in the traffic analysis for the DEIR. Neither the General Plan Land Use

Diagram (page 2-15) nor the Transportation Plan (page 33 in the Draft Circulation Element) identify the areas that would be designated "Smart Growth Streets" as stated on page 1 of the "Smart Growth Streets" draft policy document.

The "Smart Growth Streets" draft policy document states that "a holistic view of the street, the adjacent corridor, the surrounding community and the natural environment" is taken and "more flexibility in the design of street and corridor improvements" is allowed. The holistic view including the adjacent corridor and surrounding community is needed to promote the benefits expected from smart growth.

Connectivity, we believe, is a key ingredient of Smart Growth Streets. How connectivity is defined and implemented will determine how walkable and bikeable the environment of the Smart Streets is. We would like to see the "Smart Growth Streets" policy to include additional language about connectivity. Internal and adjacent connectivity are important for both infill and new-growth development. The Transportation section of the DEIR Chapter 3, Land Use discusses seven principles of smart growth found in the SACOG Blueprint. One aspect of pedestrian-supportive development given on page 3-5 of the DEIR is the avoidance of non-linear street design. While streets that are laid out on a grid or modified-grid pattern can contribute to better pedestrian mobility, there must also be many connections which are provided by intersections, alleys, paseos, trails, etc.

We also agree with the objective in the Smart Growth Streets document to create "outdoor rooms" along the street. Roadways are not just paved links between destinations – they are often a part of the living environment. The right-of-way of local streets, collectors, and arterials are part of the "living" rooms of public space. Some of that space is used for movement; some is used for social interaction or just watching.

To address these concerns, we recommend the following changes to the DEIR:

- Designate the "Smart Growth Streets" on the General Plan Land Use Diagram and on the Transportation Plan.
- Define how connectivity is defined in the "Smart Growth Streets" policy – both internal and adjacent connectivity. For guidance, see the Neighborhood Pattern and Design *NPD Prerequisite 3: Connected and Open Community* in the draft LEED for Neighborhood Development Rating System.

## 6. Leapfrog Development

Leapfrog development, as discussed on page 3-32, is not compatible with truly walkable communities. Development of dispersed residential, employment, and commercial land uses often results in destinations that are too distant for people to travel by foot. Walking becomes less utilitarian, less a means of travel and more just a recreational activity for people when the variety of land uses are spread out. Even

concentrated mixed uses, when separated from other development, does less to encourage walking and more to encourage driving.

We agree that leapfrog development has negative effects, but we are concerned that Mitigation Measure LU-1 will be inadequate. Due to the large size of the Jackson Highway Corridor and Grant Line East new growth areas, allowing each phase of growth to occur over a 10-year period may still allow significant scattering of housing and destinations.

- We suggest that additional limitations be imposed to prevent leapfrog development.

#### 7. Inconsistent numbers cited for jobs and housing in new growth areas

Critical to the land use and transportation analysis in the DEIR are the housing units and jobs projected to occur in the project timeframe. The numbers for housing units and employment on page 9-21 in Table TC-4, pages 9-102 and 103, and page 9-108 in Table TC-11 do not match.

*WALKSacramento* encourages people to walk and bicycle in their communities. The benefits include improved physical fitness, less motor vehicle traffic congestion, better air quality and a stronger sense of cohesion and safety in local neighborhoods. *WALKSacramento* is a member of the Partnership for Active Communities. The Partnership is working to support increased physical activity such as walking and bicycling in local neighborhoods as well as helping to create community environments that support walking and bicycling.

Thank you for your consideration of these comments and recommendations. If you have questions or need additional information, please contact us at (916) 446-9255 or [cholm@walksacramento.org](mailto:cholm@walksacramento.org).

Sincerely,

Anne Geraghty  
Executive Director

Chris Holm  
Project Analyst