



January 9, 2012

VIA EMAIL

Matt Carpenter  
Sacramento Area Council of Governments  
1415 L Street, Suite 300  
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**RE: Metropolitan Transportation Plan/Sustainable Communities Strategy for 2035  
Draft EIR (SCH 2011012081)**

Dear Mr. Carpenter:

Thank you for the opportunity to comment on the Metropolitan Transportation Plan/Sustainable Communities Strategy for 2035 Draft Environmental Impact Report. SACOG has produced an impressive MTP/SCS that includes increased investments in pedestrian and bicycle projects and programs even though overall funding is lower. The following comments pertain to impacts and mitigation measures in Chapter 16 Transportation.

**Impact TRN-1: Cause an increase in vehicle miles traveled (VMT) per capita that exceeds the applicable baseline average.**

The conclusion of the analysis is the VMT per capita impacts are less than significant and no mitigation is required. The declines in VMT per capita are attributed to six land use and transportation changes in the MTP/SCS. Four of those – compact land use, mixed-use development, concentrating development in high-quality transit corridors, and an emphasis on transit service and complete streets – reduce the VMT per capita by increasing transit, walk, and bike modes of travel and shorter-length vehicle trips.

VMT per capita may not accurately indicate transportation system efficiency. There is a significant percentage of the population that cannot drive or chooses not to drive. For example, the regional projections in Appendix D-1 of the MTP/SCS indicate that 45% of the population growth between 2008 and 2035 will be those 65 years of age and older. The rates of driving and automobile ownership rates for that age group will be lower than the regional average for all ages. Those people will not drive regardless of the transportation system. Including those people in the calculation of VMT per capita will skew the result toward a lower number. Will that effect be significant?

**Mitigation Measure TRN –1: Implement transportation demand management and investment strategies to reduce congested vehicle miles traveled (C-VMT)**

This mitigation measure makes suggestions for transportation demand management and investment strategies to reduce the congested vehicle miles traveled in Developing Communities that is 13% above the baseline regional average. Complete Streets can reduce congestion by allowing more people to travel on the street as more modes are utilized. Neighborhood schools can reduce local and arterial traffic by allowing more travel to schools without a car.

Add Complete Streets and neighborhood schools to Mitigation Measure TRN-1.

**Impact TRN-3: Cause combined bicycle, walk, and transit person trips per capita to be lower than the applicable baseline average, and cause a decline in the bicycle, walk, and transit person trips per capita that exceeds the baseline regional average.**

The MTP/SCS includes goals that generally consider each transportation mode independently, while the investments and performance indicators consider either transit, bicycle, or transit, walk, and bike. The DEIR combines walk, bike, and transit modes as a performance measure for non-private-vehicle modes, but doesn't consider the modes individually.

Appendix G, section XVI. Transportation/Traffic in the SB97 amendments to the CEQA guidelines checklist asks “Would the project: ... f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?” [emphasis added] Combining bicycle, walk, and transit into a single criterion obscures the positive or negative performance of each mode.

Impact TRN-3 should be expanded to analyze walk, bicycle, and transit modes separately for trips-per-capita performance.

The DEIR also does not analyze the performance of walk and bike plans in terms of health. Incorporating walking and biking into daily activity is critical to the health of people in the region. Benefits include decreased obesity, heart disease, and type 2 diabetes. More walk and bike trips mean fewer private vehicle trips, which means less air pollution and decreased lung-related health problems.

Impact TRN-3 should be expanded to analyze walk, bicycle, and transit mode performance for public health.

**Impact TRN-5: Cause interference with existing or planned bicycle and pedestrian facilities.**

By looking at only interference, this criterion for impacts doesn't fully address how bicycle and pedestrian facilities might be affected. The SB97 amendments to the CEQA guidelines checklist include performance and safety in addition to interference. Appendix G, section XVI. Transportation/Traffic asks “Would the project: ... f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise

decrease the performance or safety of such facilities?" [emphasis added] Impact TRN-3 attempts, inadequately, to assess the impact to performance, but neither TRN-3 nor TRN-5 assess the impact to the safety of the facilities.

Chapter 5 of the MTP/SCS, page 5C-6, calls attention to a study that found that people without safe places to walk within 10 minutes of home were about 40% less likely to meet recommended activity levels compared to people with safe places. On page 5C-7, the discussion of pedestrian and bicycle access to transit concludes that "Creating Safe Routes to Transit is a priority of the region" and safe access routes can enhance the appeal of walking, biking, and transit. One of the goals of the MTP/SCS, stated in the DEIR on page 16-33, is to "enhance the region's bike, walk and transit systems, and to promote growth and land uses that maximize the potential for shorter trips, which are more likely to be made by walking, biking or transit."

How do we know if the safety of the pedestrians and bicyclists will be not be negatively affected by changes to the transportation system, whether those changes are to the motorized or non-motorized components of the system? While the region-wide mode share for walking is 6.6% (Table 5C.2), pedestrians accounted for 23% of traffic fatalities in Sacramento County from 2000-2009 (Dangerous by Design 2011 report by Transportation for America). We know that even though the bicycle mode share for all travel is 1.8% (Table 5C.2), bicyclist fatalities accounted for 4.2% of the SACOG region traffic fatalities compared to 3.2% statewide (page 10-17).

Impact TRN-5 should analyze the impact of the MTP/SCS to the safety of pedestrian and bicycle facilities.

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 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.

Sincerely,

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