



July 25, 2014

VIA EMAIL
eircomments@sacog.org

Kacey Lizon, MTP/SCS Manager
Sacramento Area Council of Governments
1415 L Street, Suite 300
Sacramento, CA 95814

RE: Notice of Preparation for the 2016 Metropolitan Transportation Plan/Sustainable Communities Strategy for 2036 Update

Dear Ms. Lizon:

Thank you for the opportunity to comment on Notice of Preparation (NOP) for the 2016 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) for 2036 Update.

Potential Environmental Issues

Transportation and land use impact health through roadway safety, physical activity, and air quality. Determining the health impacts from the mix of vehicle and non-motorized transportation and the density and mix of land uses requires performance measures beyond those identified in the adopted MTP/SCS.

Transportation Safety

The pedestrian quality of the road environment and the proximity of destinations influence the decision to walk rather than to drive. The MTP/SCS seeks to improve both of these conditions in the region and SACOG monitors collisions and collision rates to track roadway safety. The adopted MTP/SCS includes "Percent reduction in accident rates" as a performance measure for transportation safety. Analyzing only collision rates or total collisions can be misleading, though.

As the transportation system and the land use pattern evolve to accommodate more pedestrian activity, the number of pedestrians exposed to potential collisions will rise and there may be a corresponding increase in the number of collisions. However, roadways that are safer for pedestrians will have lower traffic speeds and both the severity of collisions and number of fatalities will be reduced. The DEIR should analyze the severity of collisions and associated costs of medical care so the public and SACOG can better understand the impacts to pedestrian safety of the project and alternatives.

Physical Activity

The Centers for Disease Control and Prevention recommends a minimum of 30 minutes of moderate-intensity physical activity five days per week. Regular physical activity is associated with improved physical and mental health, lower risk of chronic disease and obesity, and longer life. Simply measuring the walking and bicycling mode shares will not indicate the amount of physical activity corresponding to these active transportation modes. Measuring the average time per capita spent walking or bicycling for transportation will help to estimate the potential health benefits or negative impacts from the MTP/SCS.

Are more commute trips being replaced with non-driving trips? The stress produced by single-occupant vehicle commute trips can have a negative impact on physical and emotional health. Shorter single-occupant vehicle travel time and longer active transportation commute trips should each improve the health of commuters. The DEIR should analyze the number of commute trips and travel time for the project and each of the alternatives.

Land use patterns can also impact health by influencing physical activity. Land uses that are compact with a mix of uses make it possible for people to walk to destinations on a daily basis. The number of residential units within a ten minute walk or bike trip to destinations such as schools, parks, transit, grocery stores, restaurants, employment and healthcare are good indicators of walking potential and should be analyzed in the DEIR.

Study Scenarios

The NOP states that SACOG will evaluate three preliminarily identified alternatives in the EIR. The *No Project* alternative continues current land use patterns and the adopted 2012 MTP/SCS transportation network. Scenarios 1 and 2 take land use and transportation system planning in opposite directions from the No Project alternative. *Scenario 1* has a less dense land use pattern and a transportation focus on expanding roads and highways. *Scenario 3* has a more compact land use pattern “focused on supporting high transit ridership and productivity”, and a transportation network with a “high investment in transit service and supportive road, pedestrian and bicycling infrastructure.”

Pedestrian and bicycling infrastructure is highly supportive of transit use. An excellent transit system needs a correspondingly high quality pedestrian and bicycle infrastructure to support it. The funding for bike and pedestrian street and trail improvements identified in the MTP/SCS Approach to Scenario Development report to the SACOG Board of Directors on March 13, 2014 is the same for both *Scenario 3* and *Adopted MTP/SCS (No Project)*. *Scenario 3* or an additional scenario should include greater funding for pedestrian and bicycle infrastructure compared to the proposed 2016 MTP/SCS project and the *No Project* alternative. This scenario could also include an accelerated funding timeline for pedestrian and bicycle infrastructure improvements that would provide corresponding health, safety and air quality benefits to better meet the goals of the 2016 MTP/SCS.

Other discrepancies in the MTP/SCS Approach to Scenario Development in which the more compact/more transit scenario seems to fall short of the no project scenario includes the share of transit, bike and walk trips and the share of homes in environmental justice areas near high-frequency transit. We hope that *Scenario 3* as it is defined for the EIR is truly an alternative that is substantially different from the *Proposed Project* and the *No Project Alternative*.

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.

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

Sincerely,

Chris Holm
Project Analyst