



11/7/2019

VIA EMAIL
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Renee Devere-Oki
Sacramento Area Council of Governments
1415 L Street, Suite 300
Sacramento, CA 95814

**RE: 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy
(SCH# 2019049139)**

Dear Ms. Devere-Oki:

Thank you for the opportunity to comment on the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) (SCH# 2019049139).

Impact TRN-4: Cause interference with existing or planned bicycle and pedestrian facilities.

The DEIR asserts that if the proposed MTP/SCS were to significantly interfere with bicycle and pedestrian facilities, there would be a decrease in the bicycle and walk trips per capita in the region. Subsequently, the DEIR states that the proposed MTP/SCS expansion of the network of Class I and II bicycle facilities would improve overall connectivity, and the overall improvements in land use patterns and street patterns would make walking a more attractive option. The DEIR then concludes the impacts to the connectivity of the region's bicycle and pedestrian system is considered less than significant for Impact TRN-4. However, this conclusion is erroneous as the stated criteria for the impact is "cause interference with the existing or planned bicycle and pedestrian facilities," not that the connectivity of the system is decreased.

In discussing local impacts, the DEIR makes a contention similar to that in the discussion of regional impacts, i.e. a significant impact would occur if trips per capita declined, but because the combined walk, bike and transit mode share increases and connectivity is improved, the impacts to the connectivity of the region's bicycle and pedestrian system are less than significant for Impact TRN-4. We believe this conclusion is also erroneous.

The DEIR also contends the impacts in High Frequency Transit Areas are less than significant for Impact TRN-4 for the nearly the same reasons given in the regional and local impacts discussion. We believe that, similar to the regional and local impacts, the conclusion of less than significant impacts is erroneous.

The discussion of regional impacts lists five potential ways in which the proposed MTP/SCS may interfere with the existing or planned bicycle and pedestrian system. The first and third in the list, and of greatest consequences to public health in the region, are "roadway improvement projects or the projected land use pattern which result in higher vehicle volumes or speeds adjacent to bike facilities" and "projects that make pedestrian or bicycle traffic crossing roadways more difficult by increasing roadway width or resulting in higher volumes of vehicles." Higher vehicle speeds contribute to more fatalities and greater severity of injuries in both bicycle and pedestrian collisions.

The potential ways that roadway projects may interfere with the regional system may also be applicable to local community type areas and high transit frequency areas, perhaps to a greater extent because of the greater non-automotive mode shares in those areas. The DEIR identifies five ways roadway projects may interfere with the existing or planned bicycle or pedestrian system, so there is potential for impacts as characterized by Impact TRN-4. Although SACOG has not identified a performance measure to determine interference with the system, it should be clear whether a proposed roadway project has one or more of the five listed interferences. Any roadway project – capacity or maintenance – that interferes in one of the listed ways should not be included in the proposed or any future project list.

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. The benefits include improved physical fitness, better air quality, and a stronger sense of cohesion and safety in local neighborhoods.

Sincerely,

Chris Holm
Project Manager