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November 23, 2009

Dave Defanti
Sacramento County Planning Department
County of Sacramento
827 7th Street, Room 220
Sacramento, CA 95814

Subject: Sacramento County General Plan Update: Circulation Element Smart Growth Streets Document

Dear Mr. Defanti:

The Smart Growth Streets document is proposed mitigation for impacts related to the Sacramento County General Plan Update (Update), pursuant to the Draft Environmental Impact Report (DEIR) for the Update. It is proposed as mitigation for reduced roadway level of service (LOS) due to urban expansion. Smart Growth development improves the viability of alternatives to automobile travel. We maintain that the LOS standard is not equitable for all modes of transportation as it measures service for automobiles only; nevertheless a Smart Growth program of development that improves the viability of alternatives to automobile travel is an effective way of alleviating automobile congestion.

The Smart Growth Streets document provides language for a policy that is a good start to this mitigation. Attached are suggested revisions that our agencies have collectively applied directly to the Smart Growth Streets document. These revisions are intended to help provide the full benefits of Smart Growth development in mitigating impacts associated with increased automobile traffic. They are as follows.

Objective: Design corridors that equitably accommodate all users
To provide the full benefits of Smart Growth development in mitigating impacts associated with increased automobile traffic, Smart Growth Streets must provide fully equitable accommodation for all travel modes. Smart Growth development can mitigate increased automobile traffic by improving the viability of other modes of travel, thereby increasing alternatives to automobile travel. We recommend dedicating an objective in the Smart Growth Streets document to the equitable accommodation of all modes of travel, and have suggested the addition of the following objective: *Design corridors that equitably accommodate all users, and complement the unique characteristics of the surrounding community and mix of uses.*

We have added four policies to this equitable accommodation objective, including SS-13, a policy for roadway improvements providing for equitable accommodation. Other suggested policies are as follows.

SS-14 – Because the LOS standard is not equitable for all modes of users, a truly multi-modal street must be subject to a multi-modal level of service standard. Suggested policy SS-14 stipulates that Smart Growth Streets be evaluated using an established multi-modal level of service standard.

SS-15 – Roadway networks must have adequate connectivity to provide adequate access for non-motorized travelers. We recommend building network capacity through a dense, connected multi-modal network rather than through an emphasis on high levels of vehicle capacity on arterials. By emphasizing a diversity of multi-modal routes to destinations, rather than high vehicle capacity on a few larger arterial routes, this approach gives equal access to non-motorized travelers. Suggested policy SS-15 stipulates connectivity standards throughout Smart Growth Streets.

SS-16 – Smart Growth Streets should accommodate vehicular speeds of no more than 35 miles per hour, to ensure safety for non-motorized modes such as pedestrian and bicycle travel. Corridors serving a more regional context, while accommodating a range of transportation modes, may necessitate roadways with speeds greater than 35 mph. In this case, context sensitive solutions should be considered so as to minimize barriers to pedestrian and bicycle travel. Policy SS-16 stipulates street design that accommodates vehicular speeds that are safe and equitable for all users.

Other Suggestions
Our suggestions on the Smart Growth Streets document that do not pertain directly to the equitable accommodation objective are elsewhere in the document. They are as follows.

- To be most effective, the Smart Growth Streets concept should apply to all collector, arterial and thoroughfare roadways. We have included the phrase *to identified mixed use corridors and major transit corridors* to page 1, in the introductory language.

- Reducing street lane widths is a way to reduce impervious surfaces, with resulting improvement to water quality runoff and erosion control, infiltration and groundwater recharge. We have added *reduced street and lane widths where appropriate* to policy SS-1.

- The LOS standard is not equitable for all modes of transportation as it measures service for automobiles only. The measurement "LOS F" under the standard LOS measurement does not provide an accurate measurement of overall mobility. We have replaced "LOS F" measurement language under policy SS-9.

- We commend the measure to encourage shared parking. We suggest further measures to reduce impacts of urban growth on parking availability. Possible measures include performance parking pricing, a parking benefit district and unbundling parking from commercial rents. These measures are demonstrated to be cost-effective and efficient in alleviating perceived need for copious parking. We have included language to this effect in policy SS-12.

- We have included edits to capitalize phrases including "Smart Growth Streets" and "Complete Streets," to make clear that they refer to distinct existing concepts.

Conclusion
The Sacramento Metropolitan Air Quality Management District, WALKSacramento and Sacramento Area Bicycle Advocates thank the County for the opportunity to present our comments. Please address any questions about these comments to Molly Wright (916-874-4886 | mwright@airquality.org), Jordan Lang (916-444-6600 | bikesaba@gmail.com) or Anne Geraghty (916-446-9255 | info@walksacramento.org).

Sincerely,

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Smart Growth Smart Growth Streets

GOAL: "Smart Growth Streets" that enable safe and efficient mobility and access for all users while positively contributing to the adjacent corridor, surrounding community and natural environment.

In years past, the predominant focus of transportation planning was to provide for the safe and efficient movement of vehicular traffic. However, this focused approach often failed to pay equal attention to accommodating other modes of travel, particularly walking and biking. The idea of "Complete Streets" responds to this inequity by striving to design and operate streets that enable safe and efficient mobility and access for all users. Successfully planned and constructed Complete Streets allow pedestrians, bicyclists, motorists and transit riders of all ages and abilities to safely move along and across the street. Sacramento County is committed to ensuring that all streets are built as Complete Streets.

The concept of "Smart Growth Streets" expands upon the Complete Streets concept. While both Smart Growth Streets and Complete Streets are pedestrian, bicycle and transit friendly, Smart Growth Streets take a holistic view of the street, the adjacent corridor, the surrounding community and the natural environment, while allowing for more flexibility in the design of street and corridor improvements. The County intends to apply the Smart Growth Streets concept to identified mixed use corridors and major transit corridors to support and encourage infill development and revitalization efforts. This concept is vital to the County's goal of implementing SACOG's adopted Blueprint Vision and concepts related to smart growth and transit-oriented development promoted in the County's General Plan.

Deleted: in selected new corridors and previously developed areas, such as commercial corridors,

The Smart Growth Streets concept will be implemented by designating applicable areas with a "Smart Growth Street" designation on the General Plan Land Use Diagram and the Transportation Plan. This designation requires a focused planning effort to comprehensively plan for highly coordinated and interconnected land uses, transportation infrastructure and public realm amenities.

Objective: Incorporate "green infrastructure" to the greatest extent feasible.

To make streets truly adhere to smart growth principles, , they should be planned, engineered and constructed to not only safely and efficiently accommodate all modes of travel, but also to incorporate "green infrastructure." Green infrastructure can include a number of strategies, but generally can be described as a physical improvement that reduces environmental impacts and/or results in a net environmental benefit, all while creating a more pleasant environment for users.

SS-1. Incorporate Low Impact Design (LID) techniques to the greatest extent feasible to improve water quality runoff and erosion control, infiltration, groundwater

recharge, visual aesthetics, etc. LID techniques may include but are not limited to:

- Bioretention techniques, such as filtration strips, swales, and tree box filters
- Permeable hardscape
- Green roofs
- Erosion and sediment controls
- Reduced street and lane widths where appropriate

SS-2. Use recycled and/or recyclable materials whenever feasible.

SS-3. When feasible, incorporate higher albedo materials and surfaces, such as lighter-colored pavements and cool roof technologies, and encourage the creation of tree canopy to reduce the built environment's absorption of heat to reduce the urban "heat island" affect.

Objective: Create and/or improve community identity by coordinating improvements to the streetscape and the surrounding corridor to achieve a consistent look and feel or carry through a specific "theme."

SS-4. Smart Growth Street planning efforts shall identify specific, implementable measures to create and/or improve community identity.

SS-5. Incorporate public art into streetscape improvements to the extent feasible.

Objective: Create an "outdoor room" along the street to establish a sense of place and improve the comfort and overall experience of all users, particularly pedestrians and bicyclists.

SS-6. Smart Growth Streets shall incorporate features such as shade trees and plantings, well designed benches and other street furniture, trash receptacles, news racks, outdoor dining experiences, entertainment, public art, pedestrian scaled lighting fixtures, wayfinding signage, bicycle racks and other amenities as appropriate.

Objective: Create communities and corridors using a holistic perspective when considering land uses and the design context of street and corridor improvements.

No two streets, nor two communities, are the same. As such, the concept of smart growth and sustainable streets encourages a holistic perspective of considering land uses and the design context of street and corridor improvements to allow them to be "tailored" to the area and the surrounding community. Implementing this concept will entail holistic and innovative corridor analysis techniques to account for increased pedestrian, bicycle and transit usage and regional VMT reductions associated with Smart Growth Street

improvements. Such an analysis may lead to the conclusion that a reduced LOS for motor vehicles is acceptable in certain instances provided that the land uses and enhancements to other modes of travel result in an overall positive benefit to mobility and access and may also reduce VMT. The County recognizes that within specific defined corridors that a highly coordinated and interconnected land uses and transportation infrastructure can result in improved walk-ability, bicycle use, transit opportunities and other forms of mobility, which can result in an environmental benefit and enhancements to a community. Where a corridor planning analysis indicates that motor vehicular travel will operate at LOS F, fees may be assessed to improve other modes of travel, such as enhancements to bicycle, pedestrian, transit, and public realm amenities, to encourage and facilitate travel through alternative, non-automobile modes of travel.

The following policies apply to areas and corridors identified as Smart Growth Streets on the General Plan Land Use Diagram and the Transportation Plan. Smart Growth Streets may include commercial corridors as designated by the County, regional rail, light rail, and Bus Rapid Transit (BRT) corridors, areas within ½ mile walking distance of a regional rail, light rail or BRT stations, and mixed use-corridors as designated by the County. The intent is that these areas should include frequent transit service, enhanced pedestrian and bicycle systems, a mix of land uses at densities that support transit use and be characterized as quality development.

SS-7. A Smart Growth Street designation requires a focused and holistic corridor planning analysis that considers highly coordinated and interconnected land uses and transportation infrastructure within the corridor while also considering the impacts to surrounding communities and the natural environment.

SS-8. On a Smart Growth Street, the County shall strive to maintain operations and capacity on urban roadways and intersections at LOS E or better, unless maintaining this LOS would, in the County's judgment, be infeasible and conflict with the achievement of other Smart Growth Street objectives. Congestion in excess of LOS E may be acceptable provided that provisions are made to improve overall mobility, reduce overall VMT and/or promote non-automobile transportation.

SS-9. Where a Smart Growth Street planning analysis indicates that a roadway improved to its general plan designation will be congested in excess of LOS E, mobility impacts fees may be assessed to the properties within the Smart Growth Street area and appropriate Sacramento County Transportation Development Fee Program Update fee districts. Such mobility fees shall be fairly apportioned to the properties and shall be sufficient in amount to improve other Smart Growth Street objectives such as improvements that would enhance pedestrian, bicycle, transit, other modes of mobility, and public realm amenities.

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SS-10. The County is encouraged to quantify and measure pedestrian, bicycle and transit levels of service in addition to motor vehicle level of service to support and encourage overall mobility through improvement to all modes of travel.

Objective: Encourage the use of shared driveways to reduce the total number of driveways along a Smart Growth Street to improve overall mobility and safety for all modes of travel.

An excessive number of driveways increase the amount of turning movements along a roadway, both slowing traffic and increasing potential conflicts between turning vehicles and pedestrians/bicyclists. Shared driveways thereby improve traffic flow and reduce vehicle-pedestrian conflicts.

SS-11. Smart Growth Street planning efforts shall develop a comprehensive strategy to significantly reduce the total number of driveways along the roadway, including specific measures to ensure implementation, such as requiring cross-access and reciprocal parking agreements between adjacent property owners.

Objective: Encourage the use of shared parking facilities and reduced parking requirements.

Redundant and/or excessive parking facilities are not only an inefficient use of land, they are also expensive to build and maintain, are rarely used to their capacity, increase the urban "heat island" effect, and create environments that are unfriendly to pedestrians and bicyclists. Encouraging adjacent land uses to share parking facilities and/or reducing the parking requirements in certain areas can provide an incentive for infill development by reducing the amount of land and expense that a builder must devote to parking facilities, while also leading to a more efficient use of land. It also avoids large expanses of asphalt, which impede pedestrian and bicycle travel and contribute to the "heat island" effect. Shared parking also supports the objective of reducing the number of driveways along a Smart Growth Street.

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SS-12. Smart Growth Street planning efforts shall develop a comprehensive strategy to reduce both the total amount of parking and total surface area dedicated to parking facilities. In general, reduced parking requirements, shared parking, structured parking, parking maximums rather than minimums, on street parking, performance parking pricing, parking benefit districts and other innovative parking solutions will be strongly encouraged wherever feasible, while large surface parking lots will be strongly discouraged.

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Objective: Design corridors that equitably accommodate all users, and complement the unique characteristics of the surrounding community and mix of uses.

Successfully-designed corridors accommodate the needs of all users and complement the unique assets of their surrounding communities. Corridors can accommodate the needs of all users with design that allows access to a full range of transportation modes. Corridors can also complement the unique characteristics of the surrounding community and mix of uses with appropriately-scaled design, and by providing full connectivity between destinations.

To accommodate the unique characteristics of the surrounding community, corridor design must be appropriately scaled to the community and the regional context. Corridors serving local destinations, while accommodating a range of modes, should emphasize enhanced pedestrian and bicycle access and connections. These roadways should accommodate vehicular speeds of no more than 35 miles per hour, to ensure safety for non-motorized modes such as pedestrian and bicycle travel. Corridors serving a more regional context, while accommodating a range of transportation modes, may necessitate roadways with speeds greater than 35 mph. In this case, context sensitive solutions should be considered so as to minimize barriers to pedestrian and bicycle travel.

To provide full connectivity between destinations requires providing the most direct possible routes, as well as route choices. Successful accommodation of non-motorized travel modes requires good connectivity; due to their slower speeds (relative to motorized travel), longer than necessary distances between destinations are especially inefficient. Connectivity standards to ensure equitable travel options for all users might include block size standards or a requirement for direct pedestrian / bicycle ways between all major destinations.

Finally, corridor evaluation methods must consider the accommodation of a full range of transportation modes. A measure of community objectives for corridor success must be developed, to facilitate the creation and design of corridors that achieve those objectives.

SS-13. Planning processes for Smart Growth Street corridors shall consider road diets, pedestrian and bicycle enhancements, traffic calming measures and other feasible measures to create a corridor that equitably accommodates all users and modes of travel.

SS-14. Evaluate Smart Growth Street corridors and development within those corridors using an established multi-modal Level of Service standard, which identifies development and street design impacts to a full range of travel modes.

SS-15. Establish connectivity standards to implement within Smart Growth Street corridors, to ensure safe, pleasant and direct travel between destinations for all users.

SS-16. To ensure the safety and comfort of all users, support and encourage street design to accommodate vehicular speeds of up to 35 miles per hour as appropriate.