

December 7, 2009

SENT VIA E-MAIL

Dave Defanti
Sacramento County Planning Department
County of Sacramento
827 7th Street, Room 230
Sacramento, CA 95814

**SUBJECT: Sacramento County General Plan Update Circulation Element
SMAQMD # SAC200701173**

Dear Mr. Defanti:

The Sacramento Metropolitan Air Quality Management District (District) thanks you for this opportunity to offer comments on the Circulation Element for the Draft Sacramento County General Plan Update 2030 (Update). District comments follow.

The Sacramento County *Department of Transportation's Recommended Modifications to the Transportation Plan of the Circulation Element*¹ contains multiple roadway modification proposals. Many of these proposals would have negative air quality impacts if implemented, because they are not consistent with the District's 2009 Sacramento Metropolitan Area 8-hour Ozone Attainment Plan (State Implementation Plan or SIP); and because they would not be compatible with surrounding urban and suburban areas.

We addressed roadway modifications in our July 2009 correspondence on the Update Draft Environmental Impact Report (DEIR). In that correspondence, we supported the modifications to maintain existing roadway widths; but we recommended measures to require a clear demonstration of need prior to any roadway widening, through a full public participation process.

Consistency with the State Implementation Plan

Many of the proposed modifications are not consistent with the Sacramento Area Council of Governments' (SACOG) 2035 Metropolitan Transportation Plan (MTP). The land use and transportation assumptions adopted, and their resultant Vehicle Miles Traveled (VMT) predictions in the current MTP, are the foundations for the vehicle emissions calculations in the SIP. The proposed modifications are not consistent with the MTP. Since many increase roadway width and will likely cause induced demand, they are not consistent with Regional State Implementation Plan (SIP) for Ozone. Attached is a spreadsheet with a listing of the proposed roadway modifications and descriptions of their MTP consistency.

¹ Attachment C of the staff report for 2030 General Plan Update – Adoption Hearing #11 before the Planning Commission on December 7, 2009

We do not support any modification to the Circulation Element that is not consistent with the assumptions that were used to develop the SIP. The SIP is required by the Federal Clean Air Act, and demonstrates how the Sacramento region will meet National Ambient Air Quality Standards (NAAQS). The Sacramento region does not currently meet these standards. Failure to meet these standards within the timeframe outlined in the SIP could mean much more rigorous and expensive regulations would have to be imposed on local businesses. Failure to meet the VMT assumptions in the MTP could result in a freeze or even the permanent loss of federal transportation funds to our region.

Compatibility with Surrounding Development

Some of the proposed modifications would result in 6-lane thoroughfares with added Bus Rapid Transit (BRT) lanes, for a total of 8 lanes. Roadways proposed for these modifications include Hazel Avenue, Jackson Road and Power Inn Road. Is BRT provision to these roadways certain? An 8-lane roadway without exclusive BRT lanes creates roadway capacity in excess of a thoroughfare. *Please provide us with information on the certainty of BRT provision to these roadways.*

The placement of 8-lane roadways through urban and suburban communities has negative air quality impacts – especially without exclusive BRT lanes. Enlarged roadways through urban and suburban communities create significant barriers to pedestrian and bicycle travel. This discourages pedestrian and bicycle travel in favor of automobile travel and associated air pollutants and greenhouse gas emissions. Good pedestrian conditions are also essential to good transit conditions, and may be necessary for the success of BRT along these roadways.

Further, this placement of an 8-lane roadway in proximity to sensitive receptors (i.e., housing developments, schools) poses a possible increase in human cancer risk due to toxic air contaminant (TAC) exposure. The District's *Recommended Protocol for Evaluating the Location of Sensitive Land Uses Adjacent to Major Roadways* (Roadway Protocol) was developed to assist local land use jurisdictions in discussing, assessing, and mitigating potential cancer risk. The Roadway Protocol should be consulted when residences and other sensitive receptors are placed within 500 feet of a roadway with greater than 100,000 vehicles per day for urban settings, and 50,000 vehicles per day for rural settings. *Please clearly state the amount of vehicles per day for large proposed/revised roadways especially those with 8 lanes of traffic, and refer to the Roadway Protocol for assistance in assessing the potential health risks if recommended. Please do not hesitate to consult District staff for assistance in this matter.*

Roadway Widening and Public Participation

Roadway expansion is often associated with "induced demand," or the inducement of VMT due to increased roadway capacity². Induced demand results in increased air quality pollutants and greenhouse gas emissions, associated with increased vehicle miles traveled; it also reduces or even negates the congestion reduction benefits of the road widening. *We recommend measures to require a clear demonstration of need prior to any roadway widening, through a full public participation process.*

The American Association of State Highway and Transportation Officials (AASHTO) and the Federal Highway Administration (FHWA) have supported a decision-making process for transportation projects called "Context Sensitive Solutions," available at www.contextsensitivesolutions.org. This process involves the creation of shared stakeholder vision to provide a basis for decisions; the demonstration of a comprehensive understanding of land use, social and other contexts for roadway projects; and

² Peter Hills (1996), "What is Induced Traffic?" *Transportation*, Vol. 23, No. 1, pp. 5-16.

ongoing communication and collaboration to achieve consensus to preserve and enhance community and natural environments. This process is effective, and would reduce air quality impacts associated with increased vehicle miles traveled resulting from the Update.

Conclusion

The proposed roadway modifications that are not consistent with the MTP's VMT projections do not support the District's SIP. We oppose these modifications. Further, the placement of 8-lane roadways in urban and suburban areas poses barriers to non-polluting modes of travel, and poses potential human health risks. Please provide us with information on the proposed modifications, including BRT provisions and projected vehicle volumes, so we can accurately assess their potential air quality and public health impacts.

Please address any questions about these comments to Molly Wright (916-874-4886 | mwright@airquality.org) or Rachel DuBose (916-874-4876 | rdubose@airquality.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Greene". The signature is fluid and cursive, with a large initial "L" and "G".

Larry Greene
Executive Director / Air Pollution Control Officer
Sacramento Metropolitan Air Quality Management District

LR:mw
Attachment