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Andrea Koch
Planning Department
New City Hall
915 I Street, 3rd Floor
Sacramento, CA 95814

Dear Andrea,

Comments from the Sacramento Transportation Management Association on the 2030 Draft General Plan (the Plan) are attached, detailing sections where The Sacramento TMA believed some clarification or improvement is needed.

The Sacramento Transportation Management Association (TMA) is an independent association of 165 employers that are concerned about traffic congestion and air quality in Sacramento. The TMA develops programs and coordinates sharing resources to help members' employees find alternatives to driving alone to work. The TMA is concerned with complete streets, the Level of Service (LOS) standards, connectivity standards and accommodation of bicycles.

Complete streets, taking into account all modes of transportation, are essential for a livable, sustainable and vibrant city and we commend the Plan for including complete streets as a goal. The Sacramento TMA supports this.

We also support the lower LOS standards proposed by the Mobility module of the plan. We believe lower LOS standards will encourage people to carpool, use bicycles and transit and will make it easier to build smart growth projects.

Connective transportation systems are important to encourage pedestrians and bicyclists who need short, direct routes between destinations. We believe significant small scale connections, which are important, have often been overlooked.

We also would like to see policies that support or fund secure bicycle parking at destinations. This is important to accommodate the growing use of bicycles as a mode of transportation.

Detailed comments are attached.

Thank you

**Marilyn K. Bryant
Executive Director, Sacramento TMA**

The Sacramento Transportation Management Association is an independent, non-profit association, helping its members' employees find commute alternatives since 1989.

Sacramento TMA Members: Aaron Read & Associates, AARP California, Ackler & Associates, Altria Corporate Services, Inc, American Electronics Assn., Aprea Company, Association of Insurance Companies, Bank Of Sacramento, Best Best & Krieger, Blue Shield, Board of Equalization, Boyden, Cooluris, Bullivant Houser Bailey, Bureau of State Audits, CA Assn of Private Post-Secondary Schools, CA Association of Health Plans, CA Beer & Beverage Distributors, CA Housing & Finance @ 1415 L Street, Cal/EPA, Cal/EPA - OEHHA, Cal/EPA-ARB, Cal/EPA-CIWMB, Cal/EPA-DPR, Cal/EPA-DTSC, Cal/EPA-SWRCB, California Bay Delta Authority, California Conservation Corps, California Energy Commission, California Grocers Association, California Highway Patrol, California Housing Finance Agency, California Motor Car Dealers Assn., California Nations Indian Gaming Association, California State Parks, California State University, Sacramento, California Transportation Commission, CalPERS, Caltrans, City of Sacramento, CMG Financial, Commission on P.O.S.T., County of Sacramento, Daniel I. Parrish, Delagata Corporation, Deloitte & Touche, Dept. of Alcohol & Drug Programs, Dept. of Conservation, Dept. of Corrections, Dept. of Developmental Services, Dept. of Education, Dept. of Finance, Dept. of Food & Agriculture, Dept. of General Services, Dept. of Health Services, Dept. of Justice, Dept. of Managed Health Care, Dept. of Mental Health, Dept. of Personnel Administration, Dept. of Social Services, Dept. of Water Resources, DLA Piper Rudnick Gray Cary, Downey Brand Attorneys LLP, Dynamic Healthcare, EDD, Edward Goldkuhl, Equity Offices, Essary dal Porto & Lowe, Fair Political Practices Commission, Felderstein, Willoughby, Fleishman-Hillard Inc., Hawkins Delafield & Wood LLP, Housing & Community Development, Il Fornaio, John R. and Valerie A. Davis, K & R Law Group LLP, Kahn, Soares & Conway, Kaiser South, KPMG, Kronick Moskowitz, McGeorge School of Law, MCIMetro Access Transmission, Mercy General Hospital, Mercy San Juan Medical Center, Meridian Plaza, Mike D Necochea, Mogavero Notestine Associates, Morgan Stanley DW, Morrison & Foerster, Moser Downum Investment, Nick Ballantine, Nielsen, Merksamer, O'Banion & Ritchey, Ochoa & Sillas, Office of the State Public Defender, Orrick Herrington & Sutcliffe, OSHPD, Paratransit, Inc., Parkinson & Phinney, Paul Dauer, Esquire, Pearson Prentice Hall, Penney & Associates, Perry Smith LLC, PG&E at 1415 L St., Pillsbury Winthrop, Political Solutions, LLC, Price Waterhouse Coopers, Prudential Securities, Public Health Institute, Raymond St. Mary, Regional Transit, Reznick Group, Robert Do & Monty Maxwell, SACOG, Sacramento Metropolitan Chamber of Commerce, Sacramento Natural Foods Coop, Sacramento Public Library Authority, Sacramento Superior Court, SACTO, Sakha Phon & Binh Bui, Schubert Flint Public Affairs, Secretary of State's Office, SETA/Headstart, Seyfarth Shaw LLP, Shari Fitzpatrick, Shaw/Yoder, Inc., SHRA, SMAQMD, SMUD, Spataro Restaurant and Bar, State Controller's Office, State of CA Board of Equalization, State Personnel Board, State Treasurer's Office, Stevens & O'Connell, STLI, Sutter Health, Sutter Memorial Hospital, The Diepenbrock Law Firm, U C Davis Medical Center, Sacramento, U S Army Corps of Engineers, Union Bank of California, Weintraub Genshlea Chediak, Wells Fargo Bank, Western Growers Assn., Western States Petroleum, Wilke, Fleury & Hoffelt, ,

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Page 1-2 (Vision)

Point 4: The Sacramento TMA supports all transportation modes having easy, safe access to downtown and job locations. Safe, convenient and desirable access is key to encouraging non-automotive transportation.

Point 5: The Sacramento TMA supports the city being linked to the region in this way. Currently, there are limited non-freeway options for leaving the city. The City should encourage the building of this extensive network for use by all.

Page 1-11 Land Use and Urban Design Element

This Element should include a guideline for the use of central city developer fees. Developer fees from the central city cannot be used for roadway widening because there is no space. These fees should be diverted to bicycle, pedestrian, and transit facilities. For example, they could fund crosswalks or bike/bus lanes on streets such as J Street where the previous LOS C requirement limited their installation.

Page 2-23

LU 2.7.6 (Walkable Blocks)

The Sacramento TMA supports smaller block sizes because they create more livable, people-oriented neighborhoods that are easier to get around by walking and bicycling. We suggest that this paragraph reference LU 4.5.5 which requires 300-400' block sizes for new development. Smaller block sizes should be part of measures taken to implement greater connectivity within and between neighborhoods.

Page 2-53

LU 4.1.5 (Connecting Key Destinations)

Connecting the city in this way will promote the use of bicycles for everyday transportation. This is a desirable goal, and will benefit the health and well-being of the community. The Sacramento TMA recommends the development of specific connectivity policies and standards.

Gated communities, cul-de-sacs and other non-grid street systems, sound walls and superblocks are all impediments to connectivity.

Block sizes would be a key element of the standards as well as crossings of barriers such as rivers, RR tracks, canals and freeways. Standards should be established for the distance between crossings of such physical barriers.

Other connectivity issues, such as mandatory trail connections at the ends of cul-de-sacs (when cul-de-sacs are permitted), bicycle and pedestrian portals/short-cuts through sound walls or walls surrounding commercial areas should be added. Signage can also help make bikeway connectivity clearer.

Equity of access must also be considered when planning connectivity. Certain areas of Sacramento have limited-access roadways and severed neighborhoods. Connecting these neighborhoods to destinations is critical to achieving goal LU 4.1.

The Mobility Element

This Element should include a policy supporting the preferred use of roundabouts instead of signals. Roundabouts are an air pollution and CO2 reduction measure, safer for motorists and can be safer and more convenient for bicyclists.

Page 2-162

M 1.2.2 (LOS Standard)

The Sacramento TMA strongly supports the change of LOS standards from C to D and from C to E in Multi-Modal Districts.

The language in this section should be modified from a value-tinged to a factual description of LOS. A higher LOS is not necessarily “better” than a lower LOS, so that term (“better”) should be avoided. “LOS E or better” should be changed to “LOS A-E” and “LOS D or better” should be changed to “LOS A-D.”

The Sacramento TMA strongly recommends never allowing LOS standards to drive construction or expansion of roads to more than four lanes.

Roads of four lanes or more are inherently undesirable for pedestrians and bicyclists. Having roads wider than four lanes conflicts with the intent of Complete Streets policy M 4.2 (which in M 4.2.6, for example, suggests lane reductions as a way of achieving Complete Streets). We would like to see the Complete Streets policy take precedence over LOS policy.

Peak hour automobile LOS should not be the sole criteria for making decisions on transportation and land use projects. Peak hour LOS should be balanced by the consideration of bicycle and pedestrian impacts, average LOS, quality of life effects, safety, costs, aesthetics and other factors. Having flexible LOS standards is desirable for pedestrians and bicyclists. Lower LOS standards in multi-modal areas encourage road users to use modes of transport besides their automobiles.

M 1.2.2 a. and b. is a key statement of this section: “[...] unless maintaining this LOS would, in the City’s judgment, be infeasible and/or conflict with the achievement of other goals.”

As the LOS on major roads goes down, more drivers will use parallel streets as alternative routes. The LOS of the neighborhood must therefore be taken into account – if a decrease in the LOS on one street causes a real or perceived danger to residents living in the neighborhood, this change creates a conflict with the vision of being a livable city. Traffic calming measures should be implemented in these areas to discourage these detours and encourage walking and bicycling.

Page 2-163

M 1.3.1 (Grid Network)

The Sacramento TMA supports a grid network of streets. Grids are vital elements in connectivity.

M.1.3.3 (Eliminate Gaps)

The Sacramento TMA supports the elimination of bikeway gaps, and notes that the term “well-connected” in M 1.3.1 should be defined or clarified by establishing connectivity standards.

M 1.3.3.b (Grade separated crossings)

Recommend including canals and other barriers (creeks, etc.) to this section so as not to limit the plan to railroad and freeway crossings.

Page 2-164

M 1.4 (Transportation Demand Management)

Recommend adding a goal to decrease Vehicle Miles Traveled.

M 1.4.2. (Commute Trip Reduction)

Retitle to "Automobile Commute Trip Reduction".

Recommend adding parking cash-out programs and specifying that bicycle facilities include bike parking, clothing lockers and showers.

Page 2-165

M 1.5.5 (Neighborhood EVs)

Encouraging street systems that support NEV use will also encourage use by bicyclists and pedestrians. NEVs may only be driven on streets with a speed limit of 35mph or lower. Slower speeds make pedestrian and bicycle use safer. Including NEVs in the General Plan helps assure that we have Complete Streets, provided that they are not separate facilities for the NEVs.

Page 2-171

M 3.1.1 (Transit for All)

Transit for All should include bicyclists more emphatically. Bicycle access to transit stations and stops vastly increases the "rider shed" for transit.

The Federal Highway Administration's Course on Bicycle and Pedestrian Transportation points out the advantages to bicyclists as well as the advantages to the transit system. For example, cyclists are able to travel farther distances and overcome topographical barriers, and services to recreational destinations during off-peak periods can increase overall ridership and efficient use of capacity. Accommodations for bicycles on transit should be included in these policies. Multi-modal transportation would be encouraged by including this.

Direct Access to Stations (M 3.1.12) and bicycle parking are both important, but many riders will want their bikes at the other end of their transit trips. Because of this, the Sacramento TMA suggests including bicycle accommodations on all modes of transit, and policies that ensure that any new transit options will include these accommodations in the future.

Page 2-180

M 4.2 (Complete Streets)

The Sacramento TMA supports the concept of Complete Streets.

Page 2-169

M 2.1.11 (Speed Management Policies)

The Sacramento TMA supports development of speed management policies and notes that lower speeds benefit the safety of bicyclists and motorists as well as pedestrians.

Page 2-191

M 5.1

Add a goal for Sacramento to receive the Gold-level Bicycle Friendly Community award from the League of American Bicyclists (LAB). The city currently has Bronze-level status. This award provides a measure of the city's bicycle-friendliness and could be used as one indicator for a general livability index.

M 5.1

Add a policy to provide bicycle parking as appropriate in the public right-of-way, as requested by businesses or citizens. Consider use of on-street bike parking. Offer incentives to businesses to install secure, long-term bicycle parking for employees and short-term bicycle racks for visitors.

M 5.1

Add a policy to link bikeways through the use of named routes and trails with dedicated signage and regional bikeway maps that include the routes.

M 5.1.2. (Appropriate Bikeway Facilities)

Add that the city will consider designating some streets as bicycle boulevards.

M 5.1.4. (Motorists, Bicyclists and Pedestrian Conflicts)

Add multi-use trails as locations where bicycle/pedestrian conflicts should be reduced.

Page 2-192

M 5.1.11. (Bike Facilities in New Development)

Change "bicycle racks" to the more inclusive term bicycle parking and distinguish between long term bicycle parking for employees and short term parking for visitors.

M 5.1.12 (Bicycle Parking at Transit Facilities)

Retitle "Bicycling and Transit" and add bicycle access to transit stations and stops.

Page 2-195

M 6.1.2. (Reduce Minimum Parking Standards)

Free or subsidized parking is a powerful encouragement of automobile use. We recommend that maximum parking standards be established and the city work on a regional basis to create parking policies that require motorists to pay the actual costs of supplying, maintaining and operating parking.

Page 2-187-188

Major Arterials are defined as High-speed/high-capacity roadways that provide access to regional transportation facilities. Access to parcels is a secondary function and should be limited to the extent feasible. Four lane to six-lane arterials have right-of-way widths of approximately 100 to 120 feet. Boulevards have right-of-way widths of approximately 90 to 160 feet.

The chart on 2-188 (Table M1) suggests that such a highway would be a suitable mixed-use street. This is extremely unlikely. An arterial wider than four lanes is dangerous and intimidating to bicyclists and pedestrians, and creates intersections that are too wide for a pedestrian to easily or safely cross. While bike lanes do provide some measure of safety for thru-traffic of bicycles, they do not simplify making left turns onto a cross street or driveways, let alone access to what facilities are on the street. Wider six-lane streets also encourage higher traffic speeds.

We recommend the city not construct or widen streets to more than four lanes.

Page 2-235

ERC 1.1.2 (Locational Criteria)

Safe and convenient access to schools, through proper location as described in this policy, is key to the safety of our children. Locating schools near bikeways and walkways helps to ensure this.

Page 2-309

Goal ER 6.1 (Improved Air Quality)

Bicycles are another alternative to zero-emission or low-emission automobiles. This section should point out that bicycles are a true zero-emission vehicle since even electric vehicles use power supplied from a grid that generates emissions elsewhere.