



January 9, 2012

Chair Peter Hill
Board of Directors
Sacramento Area Council of Governments (SACOG)
1415 L Street Suite 300
Sacramento, CA 95814

Re: Draft Metropolitan Transportation Plan/Sustainable Communities Strategy 2035 (MTP/SCS 2035)

Dear Chair Peter Hill and Honorable Members of the SACOG Board of Directors:

Thank you for your impressive work to advance regional planning and SB 375, California's Sustainable Communities and Climate Protection Act. Beginning with its blueprint efforts and continuing through the current implementation of SB 375, SACOG has led the state and nation with cutting-edge regional planning and transportation planning. This leadership continues with this draft MTP/SCS 2035. Its strengths include:

- By growing in strategic locations, and by boosting transit service along key arterial roads and in town centers, the plan dramatically increases the portion of jobs and housing near high quality transit, by around 150% and 200% respectively. Just as importantly, the jobs-housing balance will improve in 14 out of 15 job centers, allowing more people to walk or bike to work or to meet their daily needs.
- The plan achieves SACOG's goal of "doing more with less." This MTP has 12.5% less funding than its predecessor, but through careful spending still makes great accomplishments: bike lanes increase by 77%; transit service nearly doubles; and transit frequencies improve to 10-15 minute frequencies on many key corridors, leading to weekday ridership more than doubling and significant increases in farebox revenues.
- Congestion declines for the first time in any of its MTPs, by 7%, a dramatic turnaround from the worsening congestion planned for in 2002 (58%) and 2008 (22%). The region overshoots its 2020 per capita greenhouse gas reduction target and achieves its 2035 target – the highest in the state.

In the spirit of further strengthening a good plan and continuing one step further down the trajectory that this MTP/SCS creates for the region, we offer the following suggestions.

I. Ensure Transportation Projects Speed Toward a Complete Network of Transportation Choices for All Users

In finalizing this Draft MTP/SCS 2035, SACOG should ensure it is doing all it can to create a complete system of active transportation and transit options. To achieve this goal, it should prioritize projects that help achieve regional goals in the early years of the plan, and align transportation project phasing with the timing of future development. Specifically, we encourage SACOG to:

- **Commit to adopting a Complete Streets Action Plan within two years, including a timetable and budget for completing a continuous bike/pedestrian network around the region.** Just as SACOG does comprehensive regional planning for transit and for high-occupancy vehicle (HOV) lanes, we recommend that SACOG create a regional plan for a continuous and comprehensive network of bike/ped infrastructure. This plan should estimate a target completion date and a budget of funds necessary, and it should seek to have this network meet a stretch target for what percentage of all trips in 2035 would occur via active transportation. To create the Action Plan, SACOG should work with a full range of stakeholders to:
 - Encourage local jurisdictions to upgrade their pedestrian and bicycle master plans;
 - Identify high-priority active transportation improvements for local and regional circulation;
 - Work with local jurisdictions and other agencies to establish the desired timing for those improvements based on their location, value for regional connectivity, current and projected densities, and the location of key destinations such as schools and transit;
 - Identify the likely cost and funding gaps for those improvements;
 - Schedule regional funds to help fill funding gaps and ensure timely construction;
 - Identify policy shifts that could accelerate the timeline for those top priorities, such as continuing to prioritize those local bike/pedestrian circulation that will serve the most travelers (Strategy 29.1), and conducting systematic advance planning with local public works directors to ensure roadway maintenance achieves the maximum bike/pedestrian safety enhancement; and
 - Integrate these policies and investments into future TIPs and the next MTP/SCS, and fully analyze the health and air quality benefits of this comprehensive network.
- **Work with other agencies and local jurisdictions to identify and accelerate transit for high-density arterial corridors.** In arterial corridors where transit service doesn't currently exist, service would ideally begin as soon as a sufficient density of homes or jobs is built. In places where that density already exists, service should begin as soon as possible. SACOG should flag arterial corridors that currently lack this transit service or that may lack it at the time of housing or workplace construction, and then work with local jurisdictions and transit operators to find strategies and funding sources to accelerate service there. In addition, SACOG should carefully program its existing transportation funds to support transit expansion in these key corridors. SACOG assumes that new sales tax revenue will fund transit operations – an essential effort that we stand ready to support. In addition to working to secure additional funds for transit operations, in this MTP SACOG should (a) insert a strong policy commitment to support transit service at the time of development, (b) consider creating a placeholder for funds

that would specifically deploy transit equipment in new areas of growth, and (c) program existing transportation funds strategically to support and incentivize TOD.

- **Work with other agencies and local jurisdictions to flag and defer or cancel any costly transit capital projects that would begin construction before the densities would justify the cost.** Defer these projects until sufficient densities are present and until bus service has proven that strong ridership demand exists, as suggested by Strategy 28.9.
- **Work with other agencies and local jurisdictions to ensure road construction does not trigger growth outside existing urban areas.** Carpool lane extensions or other road widening at the urban edge should occur later in the plan, to ensure that they are not built prematurely but only after housing or workplace construction in the corridor has created transportation demand. Premature roadway construction could induce expansionary, inefficient growth patterns at the outer fringe and have substantial negative impacts. This can and should be avoided by carefully scheduling any road construction.
- **Continue to improve service for transit-dependent populations.** SACOG should continue its efforts to help provide mobility for transit-dependent populations, including youth, seniors, lower-income, and disabled people. New policies should commit SACOG to work with transit providers toward better service for youth, to direct early MTP funding to projects or programs that advance regional equity, and to restore transit service to low-income communities and other areas where transit-dependent populations live and work.
- **Commit to a full transportation project review in the next MTP/SCS** similar to MTC's Project Performance Review, which examines how each project helps achieve the region's health, equity and environmental goals.

II. Measure What Matters

A strong regional plan will not only reduce greenhouse gases but improve air quality and help regions become more equitable, healthier, and more sustainable. We are grateful that this MTP/SCS forecasts the outcomes of this plan on a number of these important indicators. Yet, other important measures were not included. SACOG should improve its ability to understand the wide-ranging impacts of land use and transportation decisions as follows:

- **Measure the draft plan's impact on a wider range of performance measures.** We believe that this MTP/SCS will likely result in significant public benefits that have not been identified; such analyses could help SACOG communicate the benefits of the plan – and help spur its successful implementation. Letters from the Coalition on Regional Equity and a collaborative of health organizations offer details on potential performance measures to examine. These might particularly include additional analyses around active transportation and the shorter trips and nearby services that make it possible; households within 1000' of highways; housing plus transportation costs; daily amount (in minutes) of transportation-related physical activity; and an expanded equity analysis. To the extent possible, these analyses should be conducted prior to the plan's adoption.
- **Commit to monitoring a broad set of indicators during the plan's implementation in an annual or mid-cycle State of the Region report.** Before ratifying this plan, SACOG should commit to monitoring a full suite of health, equity, and environmental indicators, such as injuries to cyclists and pedestrians, jobs-housing fit, the combined cost of housing and transportation,

gentrification/displacement, air quality and respiratory illness, transportation-related physical activity; and others. This should particularly include emerging performance measures that are difficult to forecast accurately. Monitoring these indicators could bolster implementation of the many positive steps in this MTP/SCS by showing the benefits it is creating for the region.

- **Commit to developing additional health and equity analysis tools to use in developing the next MTP/SCS.** SACOG deserves praise for committing to develop several important tools, such as one for jobs-housing fit, and should strengthen this by committing to their availability by the next MTP/SCS cycle. SACOG should work to better understand and convey its decisions' impacts on public health such as the impact of emissions on respiratory disease and on disadvantaged people throughout the region.
- **Commit to developing improved natural resource data and conservation strategies for integration into the next MTP/SCS.** While RUCS is an innovative and impressive program, it is focused almost exclusively on agriculture alone, and habitat and other ecosystem services do not receive the same level of analysis in the MTP/SCS or corresponding DEIR. Considering historical development trends in the Sacramento region, the Blueprint will best be adhered to with the aide of corresponding strategies and incentives for preserving the lands outside of the anticipated urban footprint. Improved data and tools are needed to inform planning decisions and efficient investment for mitigation, conservation and development.

III. Use Transit Priority Area Planning As A Springboard For Advancing Regional Goals

Implementing this plan should be a high priority for the region, and SACOG deserves applause for its approach to implementation. The plan identifies and studies transit priority areas (TPAs) where transit-oriented development will have the greatest impact. This effort will provide SACOG staff with greater knowledge about what best promotes health, equity, and sustainability around regional transit hubs. To leverage this work, we recommend SACOG commit to:

- **Include experts in promoting health, equity, and sustainability on each TPA's action planning team** to help community leaders find successful strategies for key goals. These teams should include expertise in these subjects, among others: safe active transportation; affordable housing, transportation justice; gentrification / displacement avoidance; community benefits of development; ensuring nearby access to daily needs; and public health.
- **Ensure each TPA Action Plan addresses a full range of important issues.** SACOG plans to help each neighborhood set its own goals and create an action plan to achieve it. SACOG should complement this with a checklist of issues that it asks each team to consider, created through an inclusive public process, to ensure TPAs discuss key health, equity, and sustainability issues. This checklist should be created via public input and should include:
 - building new affordable housing;
 - creating safe routes to transit for children and adults, via an active transportation inventory;
 - stabilizing existing renters, homeowners, and local businesses;
 - facilitating community benefits such as income and asset creation;
 - helping higher-density infill projects receive community support, thereby removing pressure to develop natural areas and farmlands; and
 - exploring parking pricing options to remove the costs from those who choose to not drive.

- **Identify a short set of performance measures and indicators to be used during Transit Priority Area planning.** These should be a subset of the overall regional performance measures mentioned in the previous section, and should particularly focus on measures that are especially relevant to neighborhood-scale planning, such as gentrification/displacement, and households within walking distance of daily needs.
- **Identify and share lessons learned** with local officials and stakeholders around the region.
- **Explore resources to speed the adoption of particularly important policies.** SACOG should stand ready to provide funding or staff assistance to those jurisdictions who wish to adopt essential policies and meet certain performance thresholds.

We again express our appreciation and gratitude to the Board and staff. Your efforts to implement SB 375 can help reduce climate change and ensure that future generations of Californians have cleaner air and water, healthier places to live, a stronger and more resilient economy; and greater opportunity for people across the economic spectrum.

Sincerely,

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