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						areas designated for urban scale development (Urban Centers, Urban Corridors, and Urban Neighborhoods as designated in the Land Use Diagram). These areas are characterized by frequent transit service, enhanced pedestrian and bicycle systems, a mix of uses, and higher-density development."
200	7/31/2008	Other	Steve Pyburn, Kimley-Horn & Associates	M 1.2.2, LU2 The Mobility section, Policy 1.2.2 allows LOS E in "mixed use corridors." However, the Land Use and Urban Design Element does not directly indicate where those corridors are. The land use descriptions require some interpretation to determine if a parcel is truly within a mixed use corridor. For example, Broadway is designated as Urban Corridor Low. By reading the land use descriptions, it is possible to deduce Broadway is a mixed use corridor, and thus subject to LOS E. I have worked on many city land use entitlement projects where such determinations are left to staff's interpretation. Such interpretations can extend the project approval process. It would be benenficial if the Mobility element included a map of where the	2-162	**Recommended** Text in M 1.2.2 will be revised as follows: "The City shall seek to maintain the following standards in ~~multi-modal districts including~~ the Central Business District, in areas within ½ mile walking distance of light rail stations, and ~~mixed use corridors as designated by the City~~ in areas designated for urban scale development (Urban Centers, Urban Corridors, and Urban Neighborhoods as designated in the Land Use Diagram). These areas are characterized by frequent transit service, enhanced

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				LOS D and LOS E standards will apply.		pedestrian and bicycle systems, a mix of uses, and higher-density development."
201	7/31/2008	Other	Ed Cox, DOT	M1.2.2a How will the public know where the City has designated these mixed-use corridors? Will a map be provided?	2-162	**Recommended** Text in M 1.2.2 will be revised as follows: "The City shall seek to maintain the following standards in ~~multi-modal districts including~~ the Central Business District, in areas within ½ mile walking distance of light rail stations, and ~~mixed use corridors as designated by the City~~ in areas designated for urban scale development (Urban Centers, Urban Corridors, and Urban Neighborhoods as designated in the Land Use Diagram). These areas are characterized by frequent transit service, enhanced pedestrian and bicycle systems, a mix of uses, and higher-density development."
202	7/25/2008	Edit	Walt Seifert, SABA	M 1.2.2 (LOS Standard) SABA strongly supports the change of	2-162	**Recommended** Text in M 1.2.2 modified as

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				LOS standards from C to D and from C to E in Multi-Modal Districts. However, 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."		follows: **"b. Level of Service Standard for Multi-Modal Districts-** ..... • Maintain operations on all roadways and intersections at LOS A-E ~~or better~~ at all times, including peak travel times, unless maintaining this LOS would, in the City's judgment, be infeasible and/or conflict with the achievement of other goals. ~~Congestion in excess of~~ LOS F conditions ~~E~~ may be acceptable, provided that provisions are made to improve the overall system and/or promote non-vehicular transportation and transit as part of a development project or a City-initiated project. **c. Base Level of Service Standard**-The City shall seek to maintain the following standards for all areas outside of multi-modal districts. • Maintain operations on

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						all roadways and intersections at ~~Level of Service~~LOS A-D ~~or better~~ at all times, including peak travel times, unless maintaining this LOS would, in the City's judgment, be infeasible and/or conflict with the achievement of other goals. ~~Congestion in excess of Level of Service~~LOS ~~D~~ E or F conditions may be acceptable, provided that provisions are made to improve the overall system and/or promote non-vehicular transportation as part of a development project or a City-initiated project.
203	7/31/2008	Edit	Marilyn Bryant, Sacramento TMA	M 1.2.2 (LOS Standard) SABA strongly supports the change of LOS standards from C to D and from C to E in Multi-Modal Districts. However, 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."	2-162	**Recommended** Text in M 1.2.2 modified as follows: **"b. Level of Service Standard for Multi-Modal Districts-** ..... • Maintain operations on all roadways and intersections at LOS A-E ~~or better~~ at all times, including peak travel times, unless

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						maintaining this LOS would, in the City's judgment, be infeasible and/or conflict with the achievement of other goals. ~~Congestion in excess of~~ LOS F conditions ~~E~~ may be acceptable, provided that… **c. Base Level of Service Standard**-The City shall seek to maintain the following standards for all areas outside of multi-modal districts. • Maintain operations on all roadways and intersections at ~~Level of Service~~LOS A-D ~~or better~~ at all times, including peak travel times, unless maintaining this LOS would, in the City's judgment, be infeasible and/or conflict with the achievement of other goals. ~~Congestion in excess of Level of Service~~LOS ~~D~~ E or F conditions may be acceptable, provided that provisions are made to improve the overall system and/or promote non-

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						vehicular transportation as part of a development project or a City-initiated project.
204	7/31/2008	Edit	Graham Brownstein, ECOS	M 1.2.2 (LOS Standard) In terms of the current policies, we believe that this section contains a lot of residual language from previous GPs, much of which is outdated. For instance, it describes a higher vehicular LOS as being "better" despite the fact that higher vehicular LOS values usually create more challenging conditions for bicyclists and pedestrians. We recommend that the phrase "LOS E or better" be changed to "LOS A-E", etc.	2-162	**Recommended** Text in M 1.2.2 modified as follows: **"b. Level of Service Standard for Multi-Modal Districts-** ..... • Maintain operations on all roadways and intersections at LOS A-E ~~or better~~ at all times, including peak travel times, unless maintaining this LOS would, in the City's judgment, be infeasible and/or conflict with the achievement of other goals. ~~Congestion in excess of~~ LOS F conditions ~~E~~ may be acceptable, provided that… **c. Base Level of Service Standard**-The City shall seek to maintain the following standards for all areas outside of multi-modal districts. • Maintain operations

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						on all roadways and intersections at ~~Level of Service~~LOS A-D ~~or better~~ at all times, including peak travel times, unless maintaining this LOS would, in the City's judgment, be infeasible and/or conflict with the achievement of other goals. ~~Congestion in excess of Level of Service~~LOS ~~D~~ E or F conditions may be acceptable, provided that provisions are made to improve the overall system and/or promote non-vehicular transportation as part of a development project or a City-initiated project.
205	7/25/2008	Mod	Walt Seifert, SABA	M 1.2.2 (LOS Standard) SABA strongly recommends never allowing LOS standards to drive construction or expansion of roads to more than four lanes.	2-162	**Not Recommended** The new LOS Standard (M 1.2.2) will decrease the number of roads that will be widened beyond four lanes, but the City cannot state categorically that no road will be widened beyond four lanes.
206	7/31/2008	Mod	Marilyn Bryant, Sacramento TMA	M 1.2.2 (LOS Standard) The Sacramento TMA strongly recommends never allowing LOS standards to drive construction or	2-162	**Not Recommended** The new LOS Standard (M 1.2.2) will decrease the number of roads that will be

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				expansion of roads to more than four lanes.		widened beyond four lanes, but the City cannot state categorically than no road will be widened beyond four lanes.
207	7/31/2008	Mod	Graham Brownstein, ECOS	M 1.2.2 (LOS Standard) ECOS is particularly concerned with the language of M 1.2.2 stating that LOS D or E will be preserved "unless maintaining this LOS would … conflict with the achievement of other goals." ECOS would like to remind the City that widening roadways always conflicts with the following key goals: promoting mixed-use development, promoting higher densities, promoting alternative modes, and reducing pollution and greenhouse gases. This policy is in specific conflict with the Complete Streets policy in section M 4.2. Therefore, we recommend that the City add language to this section stating: "The need to maintain a vehicular LOS standard should never lead to the construction or expansion of roadways to more than four lanes."	2-162	**Not Recommended** The new LOS Standard (M 1.2.2) will decrease the number of roads that will be widened beyond four lanes, but the City cannot state categorically that no road will be widened beyond four lanes.
208	7/25/2008	Mod	Walt Seifert, SABA	M 1.2.2 (LOS Standard) M 4.2 (Complete Streets) Roads of four lanes or more are inherently undesirable for pedestrians	2-162 2-180	**Comment Noted** The City cannot absolutely prioritize some goals and policies over others; it is left

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				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). It should be clear that Complete Streets policy should take precedence over LOS policy.		to decision makers to weigh each case. The General Plan provides numerous policies to weigh when making LOS decisions on a case-by-case basis, and it is possible to waive the LOS standard due to overriding concerns.
209	7/31/2008	Mod	Marilyn Bryant, Sacramento TMA	M 1.2.2 (LOS Standard) M 4.2 (Complete Streets) 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). It should be clear that Complete Streets policy should take precedence over LOS policy.	2-162 2-180	**Comment Noted** The City cannot absolutely prioritize some goals and policies over others; it is left to decision makers to weigh each case. The General Plan provides numerous policies to weigh when making LOS decisions on a case-by-case basis, and it is possible to waive the LOS standard due to overriding concerns.
210	7/25/2008	Other	Walt Seifert, SABA	M 1.2.2 (LOS Standard) Peak hour automobile LOS should not be the sole criterion when 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.	2-162	**Comment Noted** The City cannot absolutely prioritize some goals and policies over others; it is left to decision makers to weigh each case. The General Plan provides numerous policies to weigh when making LOS decisions on a case-by-case basis, and it is possible to waive the LOS standard due

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				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."[...] unless maintaining this LOS would, in the City's judgment, be infeasible and/or conflict with the achievement of other goals." This is a key statement of this section, and must be enforced. Only if the safety, comfort and convenience of pedestrians and bicyclists will not be sacrificed should the LOS be maintained or raised to the minimum level.		to overriding concerns.
211	7/31/2008	Other	Marilyn Bryant, Sacramento TMA	M 1.2.2 (LOS Standard) 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."	2-162	**Comment Noted** The City cannot absolutely prioritize some goals and policies over others; it is left to decision makers to weigh each case. The General Plan provides numerous policies to weigh when making LOS decisions on a case-by-case basis, and it is possible to waive the LOS standard due to overriding concerns.

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212	7/25/2008	New/Mod	Walt Seifert, SABA	M 1.2.2 (LOS Standard) As 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.	2-162	**Addressed Elsewhere** This is already addressed under Goal M 4.3 (Neighborhood Traffic).
213	7/31/2008	New/Mod	Marilyn Bryant, Sacramento TMA	M 1.2.2 (LOS Standard) As 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.	2-162	**Addressed Elsewhere** This is already addressed under Goal M 4.3 (Neighborhood Traffic).
214	7/31/2008	Edit	Traci Canfield, RT	M 1.2.2 (LOS Standards), Bullet under a): Suggest revising to "…promote non-vehicular transportation and transit as part of a development project or	2-162	**Recommended** Modify text as proposed.

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				City-initiated project".		
215	7/31/2008	Mod	Jodi Samuels, Planning Commissioner	M 1.2.2 (LOS Standards) – This policy declares that the City "shall allow for flexible Level of Service standards" but then the bullet points definite certain standards. Why can't these standards be evaluated on a project-level basis rather than set at a particular level based on different areas or districts?	2-162	**Addressed Elsewhere** We want to set standards as a baseline for project evaluation rather than relying solely on case-by-case evaluation starting from the ground up. However, the policies of the Mobility Element will give direction to evaluate each project and potentially waive the LOS standard in case of overriding concerns.
216	7/31/2008	Other	Graham Brownstein, ECOS	M 1.2.2 (LOS Standard) ECOS strongly supports the change of LOS standards from C to D (E in Multi-Modal Districts). We are, however, concerned with the implication that "congestion" is acceptable only if alternatives are in place. We believe that "congestion" is necessary in many instances to move the general plan goals forward and its presence may be necessary to provide for the essential push to alternative movement implementation. Over the longer term we encourage the City to adopt a new approach to assessing transportation impacts — one that avoids the fundamental contradictions of the vehicular LOS standard. LOS is contradictory because it	2-162	**Comment Noted** New methods of assessing Level of Service may be considered in future updates of the General Plan. At present time the method described in the General Plan EIR is the method accepted and supported by City staff to measure and describe transportation impacts.

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				identifies vehicle delay as a negative environmental impact, which creates the necessity to reduce vehicle delay to mitigate the effect. This typically leads to the widening of roadways. The net effect is that using LOS as a standard forces the City to increase pollution to meet the requirements of CEQA, which is the exact opposite of what CEQA is intended to achieve, and the exact opposite of the City's goals.		
217	7/31/2008	Other/Mod/New?	Graham Brownstein, ECOS	M 1.2.2 (LOS Standard) Diversion of Developer Fees to Alternative Modes The language of M 1.2.2 a and b seems to indicate that if developments push LOS from D to E (or E to F), this could be acceptable if developers pay for improvements to alternative modes. If so, the fees should be commensurate with what the developer would have paid to improve roadway facilities. If improvements to alternative modes are not feasible within the immediate vicinity of the development, fees should pay for alternative modes improvements elsewhere in the City.	2-162	**Addressed Elsewhere** An implementation measure with the following language will be added: "The City shall prepare and adopt a level of service methodology that defines the process for determining which non-vehicular transportation and transit improvements will be implemented where the LOS standard is not accomplished."
218	7/31/2008	New	Graham Brownstein, ECOS	LOS for Alternative Modes ECOS notes that the City has not yet adopted LOS standards for pedestrians or bicyclists. We encourage the City to adopt LOS standards for these modes that, when adopted, can be	2-162	**Addressed Elsewhere** A new implementation measure will be added: "The City shall prepare and adopt multi-modal LOS

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				implemented under the current GP language.		standards."
219	7/31/2008	Endorsement	Sue Teranishi	M 1.2.2 (LOS Standard) I support the change of LOS E in the CBD and D in general. We need to make it safer for pedestrians and bicyclists in the Central Business District!	2-162	**Comment Noted**
220	7/31/2008	Edit	Traci Canfield, RT	M 1.2.3 (Multimodal Access): Add transit stops/stations to list of activity centers	2-162	**Recommended** Revised policy: "The City shall promote the provision of multimodal access to activity centers such as commercial centers and corridors, employment centers, transit stops/stations, airports, schools, parks, recreation areas, and tourist attractions."
221	7/31/2008	Other	Sue Teranishi	M 1.3 (Barrier Removal) Remove barriers and gaps to encourage bicycling.	2-163	**Comment Noted**
222	7/25/2008	New/Mod	Walt Seifert, SABA	M 1.3.1 (Grid Network) Define or clarify "well-connected" by establishing connectivity standards.	2-163	**Recommended with Modifications** New implementation measure will be added: "The City shall prepare and adopt connectivity standards based on a review of standard applied by other municipalities with similar policy goals."

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223	7/31/2008	Endorsement	Marilyn Bryant, Sacramento TMA	M 1.3.1 (Grid Network) The Sacramento TMA supports a grid network of streets. Grids are vital elements in connectivity.	2-163	**Comment Noted**
224	7/31/2008	Mod	Graham Brownstein, ECOS	M 1.3.1 (Grid Network) ECOS supports the use of grid networks for new developments. We commend the city for adopting this policy. We recommend that the policy language drop the word "preferably."	2-163	**Addressed Elsewhere** "Preferable" allows flexibility to deal with situations that do not lend themselves to the grid pattern. Connectivity standards will create more certainty in the implementation of this policy. The City will be adding a new implementation measure: "The City shall prepare and adopt connectivity standards based on a review of standard applied by other municipalities with similar policy goals."
225	8/5/2008	Mod	Larry Greene, SMAQMD	M 1.3.1 (Grid Network) The District recommends that the City rephrase this measure to require that new streets be developed along a grid, with blocks no larger than 400 feet, unless this would in the City's judgement, be infeasible and/or conflict with the achievement of other goals.	2-163	**Addressed Elsewhere** "Preferable" allows flexibility to deal with situations that do not lend themselves to the grid pattern. Connectivity standards will create more certainty in the

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						implementation of this policy. The City will be adding a new implementation measure: "The City shall prepare and adopt connectivity standards based on a review of standard applied by other municipalities with similar policy goals."
226	7/31/2008	Mod	Graham Brownstein, ECOS	M 1.3.2 (Private Complete Streets) We support this policy and would like to see the language strengthened so that developers are required to connect not only to the "existing roadway system" but specifically to all existing residential streets and collectors that adjoin their development as well as to all existing bikeways and pedestrian paths. Where no existing residential streets or collectors exist, developers should be required to provide frequent access to surrounding arterials from within the development.	2-163	**Recommended with Modifications** New implementation measure will be added: "The City shall prepare and adopt connectivity standards based on a review of standard applied by other municipalities with similar policy goals."
227	7/25/2008	Mod	Walt Seifert, SABA	M 1.3.3.b (Grade separated crossings) Recommend including canals and other barriers (creeks, etc.) in this section so as not to limit the plan to railroad and freeway crossings.	2-163	**Recommended** Revised bullet "b" in policy: "The City shall plan and seek funding to construct grade-separated crossings of freeways, ~~and~~ rail lines, canals, creeks, and other