



September 24, 2014

Bill Shoe, Project Manager
Santa Clara County Planning Office
Dept. of Planning and Development
70 W. Hedding St., 7th Fl. East Wing
San Jose, CA 95110
bill.shoe@pln.sccgov.org

VIA E-MAIL

Re: Comments on Draft Santa Clara County General Plan Health Element

Mr. Shoe,
California Walks (Cal Walks)—the statewide voice for pedestrian safety & healthy, walkable communities for people of all ages & abilities—would like to thank the Santa Clara County Planning Office and Public Health Department for the opportunity to comment on the draft County General Plan Health Element.

We commend the Health Element for supporting multimodal transportation, particularly the emphasis on active transportation. The draft Health Element does a remarkable job of synthesizing the many health and safety co-benefits of investments in walking and biking and translating the established research on the subject into actionable policies. Below, we offer the following recommendations to strengthen the active transportation strategies and policies of the draft Health Element:

- **Remove Reference to “Accidents” with More Neutral Language:** In Section A Background, “accidents” are highlighted as one of the leading causes of death (pg. A-3). If this is referring solely to traffic fatalities and injuries, we strongly recommend that the word be replaced with collision or crash in alignment with the draft Health Element’s guiding principle of prevention—the word “accident” has been widely recognized as problematic in the traffic safety field and undermines the very concept of prevention. If the draft Health Element’s use of “accident” is broader than traffic collisions, we recommend that the term “unintentional injury” be used instead.
- **Section C. Land Use and Urban Design**
 - **Background**

We applaud and commend the strong emphasis on walkability within this section that is successfully translated to several concrete policies.
 - **HE-C.7 Complete Communities**

For consideration (b), we recommend adding “within walking distance of the majority of residential areas.” This would effectively serve as a cross-reference to

Policy HE-E.7 and enable the two policies to mutually reinforce one another. For consideration (d), we recommend that pedestrian and bicycle connections be low-stress/comfortable in addition to “safe and attractive” in order to maximize mode shift, especially for shorter trips.

- **HE-C.9 Walkability**
We recommend that “including but not limited to” be added prior to the walkable features list, as well as the following features be considered for inclusion: “frequent and safe crossings,” “minimal driveways crossing the pedestrian path,” and “amenities for people to rest or gather (e.g., water fountains, plazas, parklets).”
- **HE-C.18 Pedestrian paths and connectivity**
We recommend that in addition to promoting a clear sidewalk path, that this policy promotes a minimum clear path of travel of 4 feet (5 feet preferred) per the U.S. Access Board’s Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way,¹ which is recognized by the Federal Highway Administration as current recommended best practice.² The policy should also emphasize that a clear sidewalk path and a signed, reasonable alternate path of travel are especially critical in construction and in work zones.
- **HE-C.21 School siting and design**
This policy could be significantly strengthened by explicitly discouraging the siting of new schools near harmful or hazardous exposure land uses (e.g., freeways, high-volume arterials, industrial sites). We also recommend that the policy place an emphasis on siting new schools within walking distance from residential areas (up to 1 mile).
- **Section D. Active and Sustainable Transportation**
 - **Background**
We recommend revising the third sentence of the third paragraph to read “Additionally, when more people bicycle **and walk** for transportation, car emissions decrease.” Walking is as effective a greenhouse gas reduction strategy as biking—especially when one considers that roughly one-third of trips (32.3%) in California are under 1 mile in length, with the majority of these trips (59.7%) currently made by motor vehicle.³
 - **HE-D.1 Complete Streets**
We strongly recommend the second policy component to include “rehabilitation and maintenance.” It is very rare that our communities are able to redesign our roadways wholesale; consequently, in order to maximize complete streets

¹ U.S. Access Board. Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way. 26 Jul 2011. Available at www.access-board.gov/attachments/article/743/nprm.pdf

² Federal Highway Administration. Public Rights-of-Way Access Advisory, Memorandum. U.S. Dept. of Transportation, 23 Jan 2006. Available at www.fhwa.dot.gov/environment/bicycle_pedestrian/guidance/accessibility_guidance/prwaa.cfm

³ McGuckin, Nancy, “Walking and Biking in California: An Analysis of the California-National Household Travel Survey,” August 2012. Available at <http://www.travelbehavior.us/Nancy-pdfs/Walking%20and%20Biking%20in%20California%20Final.pdf>

- implementation, transportation maintenance and rehabilitation projects should also be required to address the needs of all road users.
- **HE-D.4 Transportation improvements**
We recommend that this policy name be changed to more neutral language to reflect its actual meaning rather than using a transportation sector euphemism: Roadway expansion or Roadway capacity expansion.

In order to better promote active and sustainable transportation and recognize the effects of induced demand, we recommend that this policy be reworded as follows (**added language in red**):

“Prioritize improvement possibilities to **active** modes of travel (**walking, biking, transit**) and technologies that add capacity within existing rights of way or travel lanes (e.g.: Express/HOT lanes, bicycle facilities, etc.) **before** pursuing new or expanded rights of way or travel lanes for **increased vehicular capacity**. Consider roadway vehicular capacity improvements only where consistent with anticipated future demand.”

- **HE-D.5 Traffic calming measures**
We strongly support this policy on traffic calming and would like to see road diets added to the list of example measures. Road diets are an effective traffic calming measure and are recognized as a proven safety countermeasure by the Federal Highway Safety Administration.⁴ We also recommend that this policy prioritize these measure for high-crash locations/corridors and/or sensitive land uses (schools, senior and community centers, hospitals, etc).
- **HE-D.7 Pedestrian network**
We recommend that the beginning of the policy (“Promote and fund pedestrian planning efforts”) be moved down into one of the activities. The policy itself should be “Create a safe and convenient circulation system for pedestrians”—this would parallel the structure of policy HE-D.8.

For HE-D.7(a), we recommend clarifying that the marked crosswalks should be “high-visibility” and to provide some example enhancements in a non-exhaustive list—“including but not limited to advanced yield lines, daylighting/corner parking restrictions, rectangular rapid flashing beacons (RRFB), pedestrian hybrid beacons, and bulb-outs/curb extensions.”

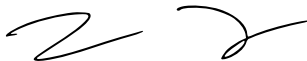
We also recommend that the pedestrian network policy explicitly address sidewalk gaps and maintenance issues, as well as connections to transit. Sidewalk maintenance is already referenced in Section E Background (p. E-2) as a barrier to the draft Health Element’s recreation and physical activity goals, but is not explicitly translated into a policy. Potential policy language could be as follows:

⁴ Federal Highway Administration. Promoting the Implementation of Proven Safety Countermeasures, Memorandum. U.S. Dept. of Transportation, 12 Jan. 2012. Available at www.safety.fhwa.dot.gov/provencountermeasures/pc_memo.htm

- “Prioritize sidewalk gaps in the pedestrian network, especially in Priority Development Areas (PDAs);
Improve accessibility of sidewalks through routine maintenance;
Provide safe and convenient pedestrian access to transit stops and stations, including but not limited to amenities described in policy HE-D.20.”
- **HE-D.15 Safe Routes to School**
We recommend that “bicycle groups” be replaced with “walking and/or biking advocates, groups and/or organizations” to better reflect the potential pool of stakeholders for Safe Routes to School programs in the County.
 - **HE-D.20 Transit stop amenities**
We recommend that this policy be expanded to “Transit stop connections and amenities” to address first mile/last mile connectivity issues and drawing from the American Public Transit Association’s recommended best practices.⁵
- **Section E. Recreation and Physical Activity**
 - **HE-E.7 Park distribution**
We strongly support the clear and unambiguous goal of this policy and believe that the 1-mile walk shed is appropriate and reasonable for achieving the policy’s goal.
 - **HE-E.12 Trails and parks network**
We recommend that this policy also include language addressing the walking, biking, and transit connections to the trails and parks network. The trails network should not be developed in isolation from the on-street pedestrian and bicycle network and should encourage these active forms of travel for access rather than driving. We also recommend that the trails network policy explicitly call for the network to be accessible at all hours in order to encourage use of the trails network for transportation purposes.

Thank you for your leadership in advancing health in all policies through the Health Element. We look forward to working with you to improve the health of all Santa Clara County residents. We are available at your convenience to discuss any of the above recommendations. Please contact us if we can be of assistance.

Sincerely,



Tony Dang
Deputy Director

⁵ American Public Transportation Association. "Design of On-street Transit Stops and Access from Surrounding Areas," APTA Standards Development Program Recommended Practice, APTA SUDS-RP-UD-005-12, 2012. Available at <http://www.apta.com/resources/hottopics/sustainability/Documents/APTA%20SUDS-RP-UD-005-12%20On%20Street%20Transit%20Stops.pdf>