



May 28, 2009

Scott Johnson, Associate Planner
Development Services Department
City of Sacramento
SRJohnson@cityofsacramento.org

RE: Natomas Crossing Project #P04-264 Draft Environmental Impact Report

Dear Mr. Johnson:

Thank you for the opportunity to comment on the Natomas Crossing project DEIR. *WALKS*acramento would like the City of Sacramento to consider additional mitigation to reduce the impacts to pedestrian circulation in the vicinity of Quadrants C and D resulting from cumulative conditions.

The DEIR considers approximately 393,000 square feet of retail uses in Quadrant C, and approximately 600,000 square feet of hospital use and 600,000 square feet medical office use in Quadrant D. Quadrant C is on the west side of East Commerce Way between Arena Boulevard and Natomas Crossing Drive. Quadrant D is on the west side of East Commerce Way between Natomas Crossing Drive and San Juan Road.

Existing pedestrian access to the site is limited due to a lack of sidewalks on the west side of East Commerce Way and the southbound roadway is not constructed to its ultimate configuration between Arena Boulevard and Natomas Crossing Drive. East Commerce Way has not been constructed between Natomas Crossing Drive and San Juan Road.

Pedestrian facilities proposed to mitigate impacts to pedestrian circulation include pedestrian pathways, shelters and benches, way finding, lighting, a driveway access plan. In addition, mitigations could also include raised crosswalks and pedestrian signal heads.

Mitigation Measure 4.4-3 (f) for long term increases in criteria air pollutants states: *Provide pedestrian/bicycle safety and traffic calming measures in excess of jurisdiction requirements that reduce motor vehicle speeds and encourage pedestrian and bicycle trips.* Actions taken such as this not only reduce air pollution, but they encourage more walking trips because pedestrians feel safer and they are not exposed to as much noise from vehicles.

*WALKS*acramento believes the most effective action that goes beyond City of Sacramento requirements is to construct East Commerce Way between Arena

Boulevard and Natomas Crossing Drive as a 4-lane roadway. This would shorten the crossing distances for pedestrians making it easier and safer for pedestrians to cross; it would slow the speed of traffic, reducing the severity of pedestrian-vehicle collisions and making the environment less noisy; and it would reduce air pollution caused by accelerations to higher arterial speeds.

WALKSacramento suggests that East Commerce Way be configured as two lanes in each direction, with parking and bicycle lanes on both sides, with a speed limit set between 25 mph and 35 mph. Curb extensions should be used to shorten crossing distances and slow traffic. Right-turn lanes should not preclude curb extensions except to reduce dangerous queuing lengths. Pedestrian refuges should be constructed in medians at each intersection.

Figure 4.2-2 Project Access Plan shows three existing/under construction traffic signals, three proposed traffic signals, and four right-in/right-out driveways on East Commerce Way from Arena Boulevard to the southern boundary of the project site. This means there will be ten vehicle conflict points in less than 3/4 mile, and six of those points will be signalized intersections. Table 4.2-3 Daily Volume Threshold for Roadway Segments indicates that low access control arterials, i.e. those with more than four stops per mile, should have a speed limit of 25-35 mph. East Commerce Way adjacent to Quadrants C and D will have the equivalent of eight stops per mile. Therefore, the roadway should be subject to traffic calming and a road diet to produce speeds such that a speed limit of 35 mph or less can be posted.

WALKSacramento encourages people to walk and bicycle in their communities. The benefits include improved physical fitness, less motor vehicle traffic congestion, better air quality, and a stronger sense of cohesion and safety in local neighborhoods.

Thank you for your consideration of these comments and recommendations. If you have questions or need additional information, please contact me at (916) 709-9843 or cholm@walksacramento.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Holm", written in a cursive style.

Chris Holm
Project Analyst

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