



April 5, 2011

Jennifer Hageman, Senior Planner  
City of Sacramento, Development Services Department  
300 Richards Boulevard  
Sacramento, CA 95811

VIA EMAIL

**RE: Draft Environmental Impact Report for the 700 Block of K Street Project**

Dear Ms. Hageman:

WALKSacramento appreciates the opportunity to comment on the Draft Environmental Impact Report for the 700 Block of K Street Project. The project proposes to remodel 74,179 square feet of existing floor space and construct 157,395 square feet of new floor space. The remodeled and new construction would provide 63,780 square feet of commercial space and 173,156 square feet of residential space containing 153 dwelling units and 91 parking spaces.

The project could bring 270 new residents and many retail and restaurant patrons to the JKL corridor. The Initial Study found the project has the potential to generate 3,120 walk, bike, and transit trips per day. The proximity of the project location to many destinations, the connectivity of the surrounding street network, and convenient transit choices will provide the new residents with many opportunities for daily active transportation and exercise.

Daily physical activity is important for attaining and maintaining physical and mental fitness. Walking trips in the neighborhood and climbing stairs to the residential units can provide much of the needed activity. Although parks are a destination for walking trips, they're also a path to better health and recreation. Therefore, it's important to provide neighborhood parks to new residents of the project.

The DEIR found the project's impact to parks and open space less than significant based upon the Initial Study finding there would be "No additional significant environmental effect." The project is located in the Central City, where the park acreage is below the General Plan goal of 5 acres per 1000 persons for neighborhood and community parks combined. The 2009 Technical Update of the 2005-2010 Parks and Recreation Master Plan presents an assessment of the park acreage service levels for the ten community planning areas in the city. Table 8 in the Assessment chapter lists the Central City 2008-2009 service performance level toward meeting the 2010 goals as 0.7 and 0.9 acres per 1000 persons for neighborhood and community parks, respectively.

Initial Study Question 8A Result in increased use of existing parks or recreational facilities such that substantial physical deterioration of these facilities could occur

The Initial Study discussion of this question says a Quimby in-lieu fee payment will provide for acquisition of a new community park site or improvements of existing parks. The General Plan Draft Master EIR states that the analysis uses “2.5 acres per 1,000 population with a service area guideline of 0.5 mile” for neighborhood parks.

The General Plan Final EIR states in a response to a comment, “As development is proposed in the city it will be evaluated to ensure adequate parkland is provided based on the number of residents and type of development proposed or a fee is paid to the city to purchase land for parks.” The General Plan Draft EIR states, “Once specific development proposals are prepared and submitted to the city, a project-specific environmental analysis would be prepared to analyze potential impacts on existing park facilities as well as to evaluate proposed new park facilities.”

While the 700 Block Project’s Quimby fee may be pooled with other resources to purchase the 0.68 acres needed to serve the additional residents, the question remains whether there is vacant land available for purchase and is that land affordable for the Department of Parks and Recreation. The Initial Study presents no documentation that parks and open space has been analyzed sufficiently to determine there is a less than significant impact.

Initial Study Question 8B Create a need for construction or expansion of recreational facilities beyond what was anticipated in the 2030 General Plan

The discussion in the Initial study of Question 8B states, “The proposed project is consistent with the General Plan and zoning designations assumed for the site in the Master EIR. The project does not propose development that would result in a greater level of impacts to park and recreational facilities than previously analyzed; and therefore, would not result in an individually minor, bur collectively significant project impact.”

It does not appear that the impact to parks and recreational facilities has been previously analyzed. The General Plan Master EIR left that analysis to individual projects as they are proposed and we believe that analysis has not been performed for this project.

We request that the EIR provide analysis of the Central City parks inventory and land available for future park site acquisition in order to accurately determine project impacts to parks and recreation. It is important for the public to be aware of the impact to parks facilities as the downtown area receives more residents.

*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. *WALKSacramento* is working to support increased physical activity such as walking and bicycling in local neighborhoods as well as helping to create community environments that support walking and bicycling.

Thank you for your consideration of these comments. If you have questions or need additional information, please contact me at (916) 446-9255 or [cholm@walksacramento.org](mailto:cholm@walksacramento.org).

Sincerely,

A handwritten signature in cursive script, appearing to read "Chris Holm".

Chris Holm

Project Analyst