9/20/2012 VIA EMAIL

Ellen Marshall, Associate Planner
Community Development Department, Current Planning Division
City of Sacramento
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

RE: 65th Street Station Student Apartments (P12-034)

Dear Ms. Marshall:

WALKSacramento has reviewed the August 17, 2012 project routing for the 65th Street Station Student Apartments (P12-034). We appreciate the opportunity to provide the following comments on the proposed project.

Development projects that lead to more walking and active travel are critical to our community's future. Human beings need moderate exercise, such as walking, for about 30 minutes a day in order to prevent the development of chronic disease and overweight. Only 38% of the population in the Sacramento region is active at this minimal level, often due to limitations placed by a built environment not suited to walking and other types of physically active travel. A 30-minute walk is about one and a half miles. If more people could obtain regular exercise by walking and bicycling to their regular destinations, in lieu of driving, it could yield significant health improvements to the resident population of this area. Reduced driving would also decrease vehicle emissions and the prevalence of asthma, cardiovascular disease, and other air pollution-related conditions. More trips by walking and bicycling could help reduce the current expensive burden on the health care system of providing medical care to more and more people with chronic conditions due to inactivity and poor air quality.

Projects such as the 65th Street Station Student Apartments with proximity to light rail and many destinations within walking distance will provide opportunities for more people in Sacramento to lead active lifestyles, reduce driving, and minimize vehicle-generated emissions and greenhouse gases. The walking distance from the light rail station boarding area to the most distant apartment will be less than 1000 feet. The Sac State campus is less than a half-mile walk, and RT buses and Sac State shuttles that go to the campus transit center stop at the light rail station. There are many existing stores, restaurants, and personal service businesses less than a ¼-mile from the site. With transit, school, and shopping destinations within walking distance, students living in the proposed apartments will have many opportunities to choose walking or transit for short- and medium-distance trips.

However, because of its proximity to Highway 50, the 65th Street Station Student Apartments will be subject to prevailing winds from the south that will blow highway particulates through the project site. Long-term exposure to fine particulate matter (PM2.5) can shorten the lifespan, causing premature death from heart and lung disease,[1] diabetes levels are higher in areas with higher levels of particulate matter air pollution,[2] higher levels of particulate air pollution are linked to faster rates of cognitive decline in older adults,[3] and children who grow up within 300-500 feet of a freeway have higher rates of underdeveloped lungs and more asthma than those living further away.[4,5] The traffic on the freeway will also generate noise that could affect the health of the apartment residents. Levels of community noise above 55 decibels (dB) are associated with numerous adverse health conditions, including high blood pressure, risk of myocardial infarction, interference with speech communication outdoors, and higher stress and stress hormone levels.[6]

One way to reduce the exposure of future residents of the project to particulates and noise is to increase the distance between the freeway and the apartment units. This could be accomplished by locating the building along the north edge of the project parcel, which is farthest from the freeway, and all resident and guest parking could be placed between the building and the freeway.

1. **Recommendation: Move the apartment buildings to the north edge of the parcel and construct a linear parking structure along the south edge of the parcel to reduce exposure to freeway particulates and freeway noise.**

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Another way to reduce the exposure to freeway particulates would be to reduce the concentration of the particulates before they reach the apartments. Certain species of trees can capture particulates from vehicle exhaust, and while there are some existing trees on the Caltrans right-of-way between the off-ramp and the project site, they may not adequately screen the proposed apartments and outdoor areas.

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[1] Krewski D, Burnett RT, Goldberg MS, Hoover K, Siemiatycki J, Jerrett M, Abrahamowicz M, White WH. Reanalysis of the Harvard Six Cities Study and the American Cancer Society Study of particulate air pollution and mortality. 2000. Cambridge, MA: Health Effects Institute.

[2] "Air Pollution Linked to Risk of Diabetes," http://diabetes.webmd.com/news/20101001/air-pollution-linked-to-diabetes-risk. Accessed August 23, 2011.

[3] Weuve J, Puett RC, Schwartz J, Yanosky JD, Laden F, Grodstein F. Exposure to Particulate Air Pollution and Cogitive Decline in Older Women. *Archives of Internal Medicine* 2012;172(3):219-227.

[4] Gauderman JW et al 2004: The Effect of Air Pollution on Lung Development from 10 to 18 years of Age. *New England Journal of Medicine* 351; 11:1057-1062.

[5] Avol EL, Gauderman LW, Tan SM, London SH, Peters JM 2001. Respiratory Effects of Relocating to Areas of Differing Air Pollution Levels. *American Journal of Respiratory and Critical Care Medicine* 164(11)2067-2072.

[6] San Francisco Department of Public Health, Environmental Health Section, Program on Health Equity and Sustainability, Health, Traffic, and Environmental Justice: a Health Impact Assessment of the Still/Lyell Freeway Channel in the Excelsior District.
http://www.sfphes.org/PODERlPODERHIAMethodsFindings.htm. Accessed August 25, 2011.

2. **Recommendation: Plant a dense line of particulate-capturing trees along the southern parcel line to reduce exposure to freeway traffic particulates.**

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The infill location proposed for the 65th Street Station Student Apartments will be ideal for Sacramento State students that would like to walk, bike, and use public transportation as their primary modes of travel. However, the variety and number of nearby destinations isn't a sufficient condition to promote walking. Connectivity to these destinations is also important and pedestrian walkways should provide convenient, direct connections both within the site and to public sidewalks. The site plan includes a direct connection to the light rail station, but connections to the adjacent streets are indirect for anyone wanting to walk south on 65th Street or Redding Avenue. According to the drawings provided in the project routing, the path of travel to 65th Street will require walking north across a driveway and then walking south across the same driveway at the street. Not only does this take pedestrians out of their way, it exposes them to the same traffic flow twice.

3. **Recommendation: Add a walkway from the west end of the building to the south side of the 65th Street driveway to improve connectivity to the surrounding area.**

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Because Redding Avenue has a much lower traffic volume and fewer travel lanes than 65th Street and no freeway ramps to cross, it may be preferred by pedestrians when their destinations are to the south. The proposed walkway to Redding Avenue is near the northeast corner of the project parcel but there is a driveway to Redding Avenue at the southeast corner. The shortest, most direct route to Redding Avenue for many residents happens to be that driveway. Pedestrians would be safer on a walkway rather than in a driveway.

4. **Recommendation: Add a walkway from the southeast corner of the building to Redding Avenue near the southern parcel line to improve connectivity to the surrounding area.**

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The site plans do not show any trees on the project site. There appears to be little space for planting parking lot trees and little space for trees to shade the walkways on the east, south, and west sides of the building. There also appears to be few locations to plant trees that will shade parking spaces and parking lot driveways. Shade trees cool the temperature of the urban environment on hot days, which reduces the formation of ozone.[7] Near areas with heavy traffic, neighborhoods with tree canopies are have lower concentrations of particulate matter than neighborhoods without trees. Children living on streets with more trees have up to 25% lower rates of asthma than children on streets

[7] Taha H, Chang S, Akbari H: Meteorological and Air Quality Impact of Heat Island Mitigation Measures in Three U.S. Cities. Lawrence Berkeley National Laboratory,April 2000. Accessed August 23, 2011 at http://www.sactree.com/assets/files/greenprint/benefits_of_trees/air_quality/lbnl-44222.pdf.

with fewer trees.[8] Neighborhoods with trees have higher levels of social interaction and lower levels of violence and crime.

5. **Recommendation: Plant shade trees in the parking lot, around the plaza next to the light rail station, and in between the building wings to improve walking environment.**

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The apartment units on the south side of the building will have views of the freeway mainline and on- and off-ramps. Tall trees planted between the apartment buildings and the freeway can provide residents with a view of greenery. Views of greenery through windows reduce stress and levels of depression and aggression, leading to fewer property crimes and violent crimes.[9]

6. **Recommendation: Plant a line of tall trees along the southern edge of the project site as a green screen.**

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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. 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 us at (916) 446-9255 or either cholm@walksacramento.org or tduarte@walksacramento.org.

Sincerely,

Chris Holm
Project Analyst

Teri Duarte, MPH
Executive Director

Enclosure: Development Checklist for Biking and Walking

[8] Lovasi GS et al. Recent Findings: Children living in areas with more street trees have lower prevalence of asthma. *J Epi and Comm Hlth* 2008; 62:547-649.

[9] Kuo, F.E., & Sullivan, W.C. (2001). "Environment and crime in the inner city: Does vegetation reduce crime?" *Environment and Behavior*, 33(3), 343-367.

DEVELOPMENT CHECKLIST for BIKING and WALKING

Prepared by WALKSacramento and SABA (Sacramento Area Bicycle Advocates)
September 2012

This checklist is provided to give an indication of design, engineering, and policy elements that we consider when reviewing development projects.

POLICIES

- ❑ Walking and biking is a priority
- ❑ Adopted a policy to develop a full multi-modal and ADA accessible transportation system

Project Review and Comment

POLICY CONSIDERATIONS

- ❑ Pedestrian Master Plan
- ❑ Bicycle Master Plan
- ❑ Regional Blueprint
- ❑ Regional Blueprint Consistent General Plans
- ❑ Adopted Climate Action Plans
- ❑ Subdivision ordinances to support pedestrian and bicycle access and safety
- ❑ Zoning ordinance to support pedestrian and bicycle access and safety

ENGINEERING

- ❑ SIDEWALKS & BIKELANES ON BOTH SIDES OF MAJOR ROADWAYS
  - o Pedestrian Level of Service "C" or better on arterials
  - o Bicycle Level of Service "C" or better on arterials
- ❑ SAFE CROSSINGS FOR PEDESTRIANS
  - o every 300-600 feet on major arterials
  - o well lit, marked crosswalks
  - o audible signals & count-down signals
  - o median refuge islands
- ❑ SPEED MANAGEMENT
  - o Speed limits based on safety of pedestrians and bicyclists
  - o Implement "road diets" where there is excess lane capacity
- ❑ STREET DESIGN STANDARDS
  - o Maximize pedestrian and bicyclist safety
  - o Sidewalks buffered by trees and landscaping on major arterials
  - o Vertical curbs
  - o 5' minimum sidewalk widths, 8' in front of schools
  - o 6' minimum bike lanes on busy streets
- ❑ INTERSECTIONS
  - o Median refuge islands for pedestrians
  - o Signal timing to enable safe passage
  - o Signal detection for bicyclists
  - o Crossings on all 4 legs of intersections
- ❑ ELIMINATE BARRIERS
  - o Freeway, railroad, river and creek crossings
  - o Obstructions in sidewalks and bike lanes

NEW DEVELOPMENT – REQUIRE

- ❑ Walking & bicycling circulation plans for all new development
- ❑ Direct and convenient connections to activity centers, including schools, stores, parks, transit
- ❑ Mixed uses and other transit supporting uses within ¼ mile of light rail stations or bus stops with frequent service
- ❑ Minimum width streets
- ❑ Maximum block length of 400'
- ❑ 4-lane maximum for arterials; Recommend 2 lanes wherever possible

NEW DEVELOPMENT – DISCOURAGE
- ❑ Cul-de-sacs (unless it includes bike/ped connections)
- ❑ Gated and/or walled communities
- ❑ Meandering sidewalks
- ❑ Inappropriate uses near transit (gas stations, drive-thru restaurants, mini storage and other auto dependent uses)

BUILDINGS – REQUIRE
- ❑ Direct access for pedestrians from the street
- ❑ Attractive and convenient stairways
- ❑ Bicycle parking – long & short term
- ❑ Shower & clothing lockers

OLDER NEIGHBORHOODS
- ❑ Improve street crossings
- ❑ Reduce speeds
- ❑ Provide new connections
- ❑ Create short cuts for walkers and bicyclists by purchase of properties or other means
- ❑ Provide sidewalks on both sides of major streets

Policy Review and Comment

ENFORCEMENT & MAINTENANCE
- ❑ Enforce speed limits
- ❑ Enforce crosswalk rules – conduct crosswalk sting operations
- ❑ Enforce restrictions against parking on sidewalks
- ❑ Enforce bicycle rules including riding with traffic, lights at night, stopping at red lights
- ❑ Implement CVC 267 setting speed limits based on pedestrian and bicyclist safety
- ❑ Sweep streets and fix hazards
- ❑ Repair and replace broken sidewalks

EDUCATION
- ❑ Train staff on pedestrian and bicycle facility design.
- ❑ Train development community about pedestrian and bicycle planning and safety issues
- ❑ Bicycle skills training

FUNDING
- ❑ Include pedestrian and bicycle facilities in capital improvement programs
- ❑ Include pedestrian and bicycle facilities as a part of roadway widening and improvement projects
- ❑ Support Measure A pedestrian and bicycle facility allocation
- ❑ Set priorities based on safety and latent demand
- ❑ SACOG Community Design grants & Bike/Ped grants
- ❑ California Bicycle transportation Account
- ❑ Safe Routes to School

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