



3/8/2013

VIA EMAIL

Dana Allen, Associate Planner
City of Sacramento, Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

**RE: Notice of Preparation of a Draft Environmental Impact Report for the
CVS/Pharmacy Development Project**

Dear Ms. Allen:

Thank you for the opportunity to comment on the CVS/Pharmacy Development Project (CVS) NOP. We hope the following comments will encourage the City of Sacramento to evaluate the potential impacts to public health that may be caused by the proposed development.

WALKSacramento asks that the environmental impact report for the CVS/Pharmacy Development Project consider the health and safety impacts to people resulting from the CVS site plan and its relationship to the surrounding land uses and street network. Public health is affected by our transportation system and the facilities and access provided to pedestrians. For the public and their elected representatives to make informed conclusions and decisions regarding new development, the full impacts to the health and safety of people must be evaluated. The analysis should include vehicle miles travelled, vehicle collisions, walking mode share, pedestrian hazards and safety. Alternatives and mitigations for impacts to health and safety should also be identified.

Transportation systems and land-use patterns that rely on the automobile for mobility and access have a harmful impact on health. With extensive use of cars for everyday travel, most people lead sedentary, physically inactive lives, and as a result, there have been dramatic changes in the health of Americans. More than two-thirds of American adults are overweight. Rates continue to increase for diseases associated with a sedentary lifestyle, such as diabetes, heart disease, cancer, and high blood pressure. People in communities where there are few or inconvenient options for walking and biking are at greater risk for obesity and chronic diseases. In Sacramento County, only 37% of adults achieve the Centers for Disease Control and Prevention recommended minimum for physical activity.

Because of high vehicle speeds, many roads are hazardous for pedestrians and bicyclists. The roads are so unsafe that people use vehicles for travel even when the distances are short. In fact, a national study found that 25% of all car trips are less than one mile. High levels of vehicle traffic lead to more collisions, causing injuries and

deaths. Despite many advances in vehicle and road safety design, automobile crashes are so common today that they are the leading cause of death of children aged 1-24.

The CVS is proposed for a location that has several large multi-family complexes and senior living complexes, a hotel, and commercial and retail uses within walking distances. A pedestrian-friendly site plan in conjunction with appropriate street crossings and pedestrian facilities could encourage more daily physical activity for residents and employees in the vicinity of the CVS. However, a site plan and street network that prioritizes high-speed travel by automobile will have negative impacts to health due to increased vehicle-pedestrian collisions and by discouraging walking.

The California Environmental Quality Act (CEQA) has made protection of the human environment and the health and safety of the people a priority. The California Public Resources Code and the Code of Regulations (CCR) each include language that considers impacts on the health and safety of people.

The intent of the California State Legislature to protect human health is stated in Public Resource Code §21000 (b) *"It is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of man."*

CCR 15126.2 Consideration and Discussion of Significant Environmental Effects, provides that short-term and long-term effects of the project are to be considered by environmental impact reports and *"the discussion should include . . . health and safety problems caused by the physical changes"*.

Public Resource Code §21083 states that the Office of Planning and Research shall develop guidelines for implementation, including criteria for determining if a project may have a significant effect on the environment. One of the conditions under which such a determination of significance would be made is if *"the environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly."*

At the local level, the Public Health and Human Services section of the 2030 Sacramento General Plan speaks to the importance of good health for people in the City of Sacramento. Goal PHS 5.1 is to *"Improve the provision of human services and promote public health and safety."* Policy PHS 5.1.7 Healthy Communities reads *"The City shall encourage the planning of new communities and revitalization of existing urban areas to achieve improvements in overall public health by encouraging walkable neighborhoods, access to recreation and open space, healthy foods, medical services, and public transit."* [emphasis added]

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