



11/30/2015

VIA EMAIL

Kelly McNally, Associate Environmental Planner
Department of Transportation, Environmental Planning
703 B Street
Marysville, CA 95901

RE: White Rock Road Widening Project Initial Study with Proposed Mitigated Negative Declaration/Environmental Assessment and Section 4(f) Evaluation STPLCM-5482(013)

Thank you for the opportunity to comment on the *White Rock Road Widening Project Initial Study with Proposed Mitigated Negative Declaration/Environmental Assessment and Section 4(f) Evaluation STPLCM-5482(013) (IS/EA)*.

The *IS/EA* describes the project as including a four-lane configuration with 12-foot-wide lanes. However, the design standards for both the City of Rancho Cordova¹ and Sacramento County² specify that 4-lane and 6-lane arterials shall have 11' lanes with 12' inside lanes. The *IS/EA* doesn't indicate a reason for this design exception. Marking 11' and 12' lanes can free up one to two feet of pavement on each side of the roadway that could be used for additional shoulder width or bike lane buffers within segments, and for curb extensions at intersections. All references to roadway lane widths should be changed to "11' lanes with 12' inside lanes", especially in the project description on page *i* and the build alternative on page 12.

The *IS/EA* also describes the project as having 3-foot-wide shoulders with no mention of sidewalks. It should be anticipated that pedestrians will travel along White Rock Road within the project area, including the existing industrial area at the western end of the project area and particularly at the Westborough Specific Plan and Rio Del Oro Specific Plan areas when development occurs. The regulatory setting of the *IS/EA* is discussed on page 78 in Section 2.1.5 Traffic and Transportation/Pedestrian and Bicycle Facilities, which states that Federal-aid highway projects should give full consideration to safe accommodation of pedestrians. The Cumulative Impacts "Traffic and Transportation/Pedestrian and Bicycle Facilities" section for the Build Alternative on page 226 states "The proposed project would also have a beneficial impact to pedestrian and bicycle facilities by adding bike lanes and sidewalks where there currently are none." A shoulder is not a safe travelway for pedestrians, especially when traffic volumes and speeds are high, such as is expected for White Rock Road. Sidewalks should be

¹ <http://www.cityofranhocordova.org/Modules/ShowDocument.aspx?documentid=9350>

² http://www.engineering.saccounty.net/Documents/Sect4StreetStds_Saccounty_%20Ver11_01_09.pdf

constructed with the project or a schedule for sidewalk construction should be part of the proposed project.

The October 2010 *White Rock Road Improvements Initial Study (Control Number 2009-70081)* on page IS-14 identifies three goals and policies of the City of Rancho Cordova General Plan that are applicable to the project, one of which relates to pedestrians. Policy C.1.11 reads "As part of major individual roadway enhancement project (e.g., intersection redesign, signalization of previously un-signalized intersection), enhance and upgrade pedestrian and bicycle facilities within one-quarter mile of the project." This policy is not found in the *IS/EA*. The *IS/EA* should include discussion of Policy C.1.11 in Section 2.1.1.2 Consistency with State, Regional, and Local Plans and Programs, and include Policy C.1.11 in Table 2.1-2 Consistency with Local Plans and Programs

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 me at (916) 446-9255.

Sincerely,

Chris Holm
Project Manager