



1/19/2018

VIA EMAIL

Tim Hawkins, Environmental Coordinator  
Office of Planning and Environmental Review  
827 7th Street, Room 225  
Sacramento, CA 95814

**RE: Revised Notice of Preparation of a Draft Environmental Impact Report for the Natomas North Precinct Specific Plan (PLNP2014-00172)**

Dear Mr. Hawkins:

Thank you for the opportunity to review and comment on the Revised Notice of Preparation (NOP) of a Draft Environmental Impact Report for the Natomas North Precinct Specific Plan (PLNP2014-00172).

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. These benefits are contingent upon land use and transportation plans that facilitate and promote walking and biking. With these goals in mind, we make the following recommendations for the Natomas North Precinct Specific Plan Draft Environmental Impact Report (EIR).

The NOP states that a transportation impact study will be prepared and that a vehicle miles traveled (VMT) analysis will be conducted. The NOP indicates the transportation impact study will examine the effects of the project on roadways as well as pedestrian, bicycle and transit modes. Pedestrians, and to a lesser extent bicyclists, are sensitive to distance; both much more so than drivers. One of the stated objectives of the project is to develop pedestrian and bicycle friendly neighborhoods, and we agree with this objective. But as communities and cities are composed of multiple, adjacent neighborhoods, it's critical to build in a manner that makes it easy and safe to walk and bike beyond one's neighborhood. The proposed land use plan should be critically reviewed to ensure it supports community-wide active travel.

There are several features of the land use plan that we would like the EIR to analyze for its impact on pedestrian, bicycle and transit modes of travel. *Figure NOP-10: Conceptual Land Use Plan* shows a diverse distribution of land uses and densities, but it appears the average densities in the northern half of the plan area are greater than those in the southern half. Nearby destinations outside of the project area will primarily be to the south in the City of Sacramento community of North Natomas. Future destinations to the north within the planned Sutter Pointe Specific Plan area will be more distant than those in North Natomas.

The arrangement of land uses within the project area may also affect travel behaviors for residents in North Natomas. Destinations, such as commercial or employment, within the project area could be closer for North Natomas residents than comparable destinations in North Natomas making for shorter and non-vehicular trips.

We recommend the EIR analyze Person Miles Traveled by walking and bicycling in addition to VMT. Further, analyzing Person Miles Traveled by neighborhoods or blocks could help establish the effectiveness of the land use plan to promote and facilitate active transportation.

*Figure NOP-8: Proposed Zoning Designations* identifies properties within the Natomas North Precinct Specific Plan (NNPSP) that are not participating in the project. Several of the areas combine to isolate the majority of the planned development from development to the south. This open space, even if roadways and bike trails were to be constructed through them, will add extra distance between communities and may decrease walking and biking. The EIR should analyze the plan area with the non-participating properties remaining undeveloped during the cumulative time frame as an alternative to the proposed project.

The effective boundaries for development created by the non-participating properties are irregular and the proposed project's consistency with LU-119 is questionable. The EIR should consider the project's consistency with LU-119 using its effective boundaries.

*Figure NOP-11: Proposed Transportation Plan* has two errors that should be corrected for the EIR. First, the roadways in the city of Sacramento Panhandle Annexation project are not shown. Street 'G', which will have a signalized intersection at Elkhorn Boulevard should be shown on the figure. Second, East Commerce and Natomas Boulevard within the city of Sacramento are shown as "Existing Collectors." They should be shown as "Existing Arterials."

Thank you for your consideration of these comments and recommendations. If you have questions or need additional information, please contact me.

Sincerely,

Chris Holm  
Project Manager