



2/8/2013

VIA EMAIL

Catherine Hack, Environmental Coordinator
Department of Community Development
Planning and Environmental Review Division
827 7th Street, Room 220, Sacramento, CA 95814

RE: Notice of Preparation of a Draft Environmental Impact Report for Newbridge Specific Plan (Control Number PLNP2010-00081)

Dear Ms. Hack:

Thank you for the opportunity to comment on the Newbridge Specific Plan NOP. We hope the following comments will encourage the County of Sacramento to evaluate the potential impacts to public health that may be caused by the proposed development.

Transportation systems and land-use patterns that rely on the automobile for mobility and access have a harmful impact on health. 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. Distances between home, work, school and shopping that are too great for walking or bicycling often force people to drive.

A transportation network that serves primarily car trips not only makes travel difficult for pedestrians and bicyclists, but it can expose them to greater safety risks. Wider, faster roads increase the rates and severity of collisions and reduce the opportunities for safe crossings.

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

The State of California, in 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*". Although the Newbridge Specific Plan is not subject to NEPA evaluation, note that Federal regulation, in CEQ §1508.27, states that the intensity of a significant effect should be evaluated based upon the "*degree to which the proposed action affects public health or safety.*"

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.”*

The County of Sacramento also has policies regarding the impacts of development on the health and safety of people. The 2030 General Plan recognizes that *“Inefficient and unsustainable land uses are producing serious health, social, economic and environmental consequences that have not yet been fully realized.”* Complete Communities are intended to *“enhance neighborhood character and minimize automobile travel”* and *“The resulting non-automobile street activity will promote human contact and a sense of neighborhood, as well as reduce automobile traffic and the associated impacts.”* *“Well-designed transportation systems can help promote the health of County residents. Provisions for walking, bicycling, and transit use can help residents increase daily physical activity and reduce overweight and the development of chronic diseases. Switching from private automobiles to walking, bicycling, and transit use reduces vehicle emissions, air pollution, and associated health problems such as asthma and respiratory disease. And, with appropriate street design, rates of injuries to motorists and pedestrians decline. To achieve health outcomes, the transportation system is designed to accomplish the following goals: • Provide affordable, safe, and sustainable public transportation options • Decrease private motor vehicle trips and miles traveled • Increase traffic safety for all users”.*

We agree with these General Plan statements of intent and goals, but we do not believe there has been adequate evaluation of the results we can expect from the transportation and land use policies.

We may hope that we have a well-designed transportation system, but all that is considered for environmental review is automobile level of service, noise, and air pollution. We don't know how many injuries and fatalities will result from thoroughfares and arterials that surround and separate communities.

The General Plan may state that *“increasing physical exercise in a community may be as easy as making communities more safe and fun to experience as a pedestrian or bicyclist”*, but we don't know how many additional people will suffer chronic diseases or obesity because the community design discourages them from getting enough physical activity.

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.

WALKSacramento asks that the environmental impact report for the Newbridge Specific Plan consider the health and safety impacts to people resulting from the proposed community design, land uses, transportation facilities and circulation network. The analysis should include vehicle miles travelled, vehicle collisions, walking mode share, pedestrian hazards and safety, and opportunities to walk to school, shopping, work,

transit, recreation and socializing. Alternatives and mitigations for impacts to health and safety should also be identified.

The general impacts might be determined by a literature search, and the impacts specific to the Newbridge Specific Plan area could be determined as part of a Health Impact Assessment (HIA). HIA is an effective and proven approach that allows the inclusion of health impacts in the decision-making process for transportation and land use projects, plans, and policies. An HIA would involve stakeholders, provide an objective assessment of potential direct and indirect health impacts (both positive and negative), and identify strategies or actions to address the impacts.

Sincerely,

Chris Holm
Project Analyst

Teri Duarte, MPH
Executive Director