



9/4/2013

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 Jackson Township Specific Plan (Control Number PLNP2011-00095)

Dear Ms. Hack:

Thank you for the opportunity to comment on the Jackson Township 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, which includes 6,143 residential units, 1,996,100 square feet of commercial and office uses, 105 acres for fire station/community center and elementary, middle, and high schools, 379 acres for parks and open space, and 200 acres for agriculture and primary roadways.

The Notice of Preparation for the Jackson Township Specific Plan indicates that “a Traffic Impact Study will be performed to examine the effects of proposed project development and facilities on area roadways.” However, more than just area roadways may be affected by the proposed project. Distances between home, work, school and shopping that are too great for walking or bicycling often force people to drive and a transportation network that serves primarily car trips with wider and faster roads and/or fewer crossing opportunities increases the rates and severity of collisions for pedestrians and bicyclists. Further, transportation systems and land-use patterns can have a harmful impact on health. People in communities built to facilitate automobile travel, and where there are few, inconvenient or unsafe options for walking and biking, are at greater risk for inadequate physical activity, obesity and chronic diseases. In Sacramento County, only 37% of adults achieve the U.S. Centers for Disease Control and Prevention recommended minimum for physical activity.

For members of 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 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*”. 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.”*

WALKSacramento asks that the environmental impact report for the Jackson Township 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 could 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.

Sincerely,

Chris Holm
Project Analyst