



7/3/2013

VIA EMAIL

Dana Allen, Associate Planner
City of Sacramento, Community Development Department
300 Richards Boulevard
Sacramento, CA 95811

**RE: Draft Mitigated Negative Declaration for the Campus Crest Housing Project
(P12-038)**

Dear Ms. Allen:

WALKSacramento has reviewed the Draft Mitigated Negative Declaration for the Campus Crest Student Housing Project. We submit the following comments to encourage the City of Sacramento to provide a complete and meaningful analysis of the potential transportation impacts of the proposed project.

Development projects that lead to more walking and active travel are critical to our community's future. Human beings need moderate exercise for about 30 minutes a day, such as walking one and a half miles, in order to prevent the development of chronic disease and overweight. Only 38% of the population in the Sacramento region is active at this minimal level, often due to limitations placed by a built environment not suited to walking and other types of physically active travel. If the future residents of Campus Crest Housing could obtain regular exercise by walking and bicycling to their regular destinations, such as Sac State, it could yield significant health improvements for them. Reduced driving would also decrease vehicle emissions and the prevalence of asthma, cardiovascular disease, and other air pollution-related conditions.

Will the proposed Campus Crest project contribute to more walking and will the site design encourage students to walk? Perhaps not, since the abundance of automobile parking spaces and their close proximity to the apartment units will make it easy for students to opt to take the car rather than walk to school and nearby stores and restaurants.

The vehicle trip generation results included in the Initial Study may not present an accurate assessment of the number of auto trips the project will put on the streets of the local area. The reason for this is because the transportation behaviors of college-age students are different from the typical residents of apartments used as the basis for the ITE trip generation rate. We believe the Mitigated Negative Declaration should account for this and use a trip generation rate determined by a local study or from studies of comparable situations.

Furthermore, the traffic study providing the basis for the Mitigated Negative Declaration was conducted for a different project and the assumptions made for that project aren't identified in the Campus Crest Initial Study. The discussion in the Initial Study also indicates that Mitigation Measures 11-1 through 11-3 will reduce the trip impacts to a less-than-significant level. However, we have been unable to find mitigation measures with such numbering in any associated EIR's.

Considering that the trip generation rate may be invalid, that the traffic study was from a different project, and that several traffic mitigation measures are not clearly stated, WALKSacramento requests that a new traffic study be conducted.

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 or cholm@walksacramento.org.

Sincerely,

Chris Holm
Project Analyst