



4/26/2019

VIA EMAIL

Stephanie Coleman, Sr Env Plnr
Environmental Services
Department of General Services
Real Estate Services Division
707 Third St., 4th Floor
West Sacramento, California 95605

RE: Draft Environmental Impact Report for the Richards Boulevard Office Complex Project (SCH# 2018122034)

Dear Ms. Coleman:

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Richards Boulevard Office Complex Project (SCH# 2018122034).

Mitigation Measure 3.11-1(a)

Mitigation Measure 3.11-1(a) would provide an optimal amount of parking to minimize baseline vehicle trips. The analysis showed that adding 436 on-site parking spaces would reduce the overall number of peak hour trips by replacing two-trip-end TNC (ride hailing) and 'kiss and ride' trips with single-trip-end trips.

The monthly cost for daily TNC trips to and from the project site could be in the range of \$400 to \$800, making such a travel mode infeasible for employees, even if it was the only fare-based portion of the commute. We question whether there would be TNC trips that could be replaced by the addition of more parking spaces.

In the event there is a reasonable expectation there will be a significant number of TNC trips, we suggest including a mitigation to would reduce TNC trips by providing a shuttle service.

Mitigation Measure 3.11-4(e)

Mitigation Measure 3.11-4(e) would implement a free shuttle during peak periods between the Blue Line station and the project site. The DEIR concludes that Impact 3.11-4 would be significant and unavoidable because the mitigation measures require agreements with transit service providers. However, a shuttle as described in (e) could be under contract by DGS and, as such, may not require agreements with transit service providers. The shuttle could also be a means to reduce TNC trips and to increase employee mode split for light rail transit.

Mitigation Measures 3.11-5 and 3.11-12

The DEIR finds the current design precludes an east-west bicycle facility along the planned Bannon Street extension through the site, but it also states that it's unknown whether the project design could accommodate an east-west through street. The DEIR concludes the impact to bicycle facilities would be significant and unavoidable. We request that a third mitigation measure

be added that would require an east-west bicycle facility in the event that Bannon Street is not extended through the site.

Mitigation Measures 3.11-6 and 3.11-13

The DEIR finds the current design precludes an east-west pedestrian facility along the planned Bannon Street extension through the site, but it also states that it's unknown whether the project design could accommodate an east-west through street. The DEIR concludes the impact to pedestrian facilities would be significant and unavoidable. We request that a third mitigation measure be added that would require an east-west pedestrian facility in the event that Bannon Street is not extended through the site.

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.

Sincerely,

Chris Holm
Project Manager