10/1/2019 VIA EMAIL

June Cowles, Senior Planner
City of Rancho Cordova Planning Department
2729 Prospect Park Drive
Rancho Cordova, CA 95670

RE: Draft Environmental Impact Report for The Ranch Project (SCH # 2018072011)

Dear Ms. Cowles:

Thank you for providing WALKSacramento with the opportunity to comment on the Draft Environmental Impact Report for The Ranch project. We have reviewed the DEIR for its analysis of walking and biking impacts and mitigations.

Impact 3.6-2: The Project has the potential to generate operation-related GHGs, either directly or indirectly, that may have a significant effect on the environment (Less than Significant with Mitigation)

The DEIR concludes that the sustainability features and other details of the Project mitigate GHG emissions to a less than significant level. The DEIR states that the sustainability features and Project details that contribute to the GHG emission reductions are detailed in Chapter 2.0, Project Description. There are nine sustainability features listed in the chapter and there are sections describing land uses and circulation, but there doesn't seem to be any sustainability features or project details that explain the efficacy of the mitigations. The individual contributions to GHG emissions reduction for each measure are also not stated.

Mitigation Measure 3.6-1 The Ranch GHG Reduction Plan

LUT-9 Improve Walkability Design: Walkable Street Network This reduction measure states the project "is designed with a walkable street pattern, 123.53 intersections per square mile, multiple bicycle/pedestrian connections, an off-street trail system, and bicycle lanes to encourage walkability." The DEIR indicates that intersections per square mile was the only parameter used to model the project's reduction in GHG emissions. We question whether intersections per square mile figure that was used is appropriate and if it accurately reflects a walkable and bikeable street pattern, though.

The Ranch is composed of three major areas – the single-family residential Parkview, the gated active-adult single-family and multi-family Four Seasons, and the commercial and multi-family Gateway. The street patterns in Parkview and Four Seasons are similar, but the

gating of Four Season will have a significant impact on vehicular and pedestrian circulation. While residents of Four Seasons will have be able to walk throughout both the Four Seasons and Parkview communities, residents of Parkview will be unable to use the street and trail network within Four Seasons. Further, Parkview residents and all other people outside of Four Seasons will be able to walk or bike around only three sides of the Four Seasons community.

The difference in connectivity and street network for the two groups of people, those living in Four Seasons and those not living in Four Seasons, suggests that a single measurement of walkable design, i.e. intersections per square mile, will not accurately model the GHG emissions reduction resulting from reduced VMT and corresponding increase in walking and biking.

LUT-4 Improve Destination Accessibility: Project close to regional employment or destination center

This reduction measure is based on the expected reduction of GHG emissions due to fewer miles driven to a downtown or major job center as compared to a typical ITE suburban development. The contribution of replacing auto trips with bicycling will be reduced by the diminished connectivity that results from gating nearly half of the project. The LUT-4 modeling should take this into account and the DEIR should include an explanation of the calculations.

SDT-1 Improve Pedestrian Network: On-site pedestrian access network links all of project internally and externally

The DEIR makes the same statement of applicability for improving the pedestrian network as it does for improving the walkable design. As with LUT-9, the measure's efficacy is diminished by the two different project-wide pedestrian/bike networks – one for Four Seasons residents and one for all others. Barriers are increased, rather than minimized, by the gated community.

SDT-2 Provide Traffic Calming Measures: Projects streets and intersections feature traffic calming features

The DEIR doesn't provide the percentage of streets and intersections with traffic calming improvements, nor does it identify the improvements.

Mitigation Measure 3.13-2: Intersection #9, Grant Line Road at Sunrise Boulevard

This measure would restripe the southbound approach at the intersection. The restriping is described as having hatching and being consistent with Optional Through Right and Right-Turn-Only lane configuration included in Figure 9C-4a (CA) of the California MUTCD. The referenced configuration doesn't have any hatching and may be inappropriate for all but the most experienced and fearless bicyclists. We suggest that the

configuration on sheet 2 of Figure 9C-4a would provide a safer environment for bicyclists as it has a hatched buffer between the bike lane and one travel lane.

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 Analyst