

March 9, 2009

**SENT VIA E-MAIL**

Ms. Lindsey Alagozian  
Development Services Department  
City of Sacramento  
300 Richards Boulevard, 3rd Floor  
Sacramento, CA 95811

**Subject: Natomas Crossing P04-264  
SMAQMD # SAC200400124**

Dear Ms. Alagozian:

Thank you for providing the Sacramento Metropolitan Air Quality Management District (SMAQMD) with the opportunity to review this project. Since we commented on this project in January 2009, we have obtained site plans not previously available to us, and we have further recommendations to improve the project's support of non-motorized travel and associated air quality benefits. These recommendations would significantly improve the potential of this project's Air Quality Management Plan to mitigate its air quality impacts.

Our primary recommendation is to place store frontages along East Commerce Way, to reduce their distance from the residential area to the east, and to create pleasant pedestrian conditions along East Commerce Way. We commend the current placement of some of the site's smaller buildings near corners of East Commerce Way and entries to the site. There are additional buildings on the site that are currently located nearer to Interstate 5, and would be more appropriately located fronting onto East Commerce Way. These buildings have smaller square footages, less than 20,000 square feet, and are suited to neighborhood commercial uses. Neighborhood commercial uses are pedestrian-oriented, including specialty markets, bookstores and eateries. Fronting these stores onto East Commerce Way would significantly improve their pedestrian access from the residential area to the east.

Reducing the distance between these buildings and the adjacent residential uses promotes the use of non-motorized travel. Non-motorized travel requires shorter distances than motorized travel to be feasible, and placing an expanse of parking lot between these destinations and adjacent residential uses will likely encourage driving to access them. Further, fronting these smaller buildings onto East Commerce Way would help define the street as a pedestrian space by lining it with the stimulus and convenience of accessible destinations, rather than an expanse of parking lot.

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Placing these buildings fronting the street is consistent with Smart Growth Development, a type of development that is associated with reduced motor vehicle travel and reduced motor vehicle emissions. Well-developed pedestrian networks, a human-scaled streetscape and building frontages with primary pedestrian access are important characteristics of Smart Growth Development. Smart Growth Development is called for in the SACOG Blueprint Principles as well as the City of Sacramento's Draft 2030 General Plan Guiding Principles. Draft 2030 General Plan Guiding Principles calling for this type of development include:

- Promote designs for development that are compatible with the scale and character of Sacramento's existing neighborhoods.
- Locate and design buildings, streetscapes and public spaces that contribute to walkable neighborhoods.
- Promote developments that foster accessibility and connectivity between areas and safely and efficiently accommodate a mixture of cars, transit, bicyclists and pedestrians.
- Protect the development of complete neighborhoods both in infill and new growth areas that foster a sense of place.
- Promote livable and well-designed neighborhoods that are walkable and complete, with a mix of uses and services to support improved health and the needs of families, youth, seniors, and a growing population.

This project site's proximity to Interstate 5 positions it for regional retail, but its proximity to the sizeable residential area to the east positions it for neighborhood commercial uses. Locating the smaller buildings, which are more appropriate to neighborhood commercial, on East Commerce Way creates the pedestrian friendly conditions that support neighborhood commercial and enhance adjacent residential areas. This will not compromise the positioning of the site's larger buildings as regional retail with access to Interstate 5. Fronting these buildings onto East Commerce Way can only improve this project as an amenity to the adjacent residential area, by bordering their neighborhood with destinations, rather than an expanse of parking lot. If you have questions about these comments, please contact me at 916-874-4886 or [mwright@airquality.org](mailto:mwright@airquality.org).

Sincerely,



Molly Wright  
Air Quality Planner/Analyst

Cc: Larry Robinson, Program Coordinator, SMAQMD  
Greg Guardino, Alleghany Properties, LLC