



January 31, 2014

VIA ELECTRONIC AND U.S. MAIL

Scott Johnson, Associate Planner
City of Sacramento, Community Development Department
Environmental Planning Services
300 Richards Boulevard, Third Floor
Sacramento, CA 95811

Re: Sacramento Entertainment and Sports Center
Region Builders Comments on Draft Environmental Impact Report

Dear Mr. Johnson:

Region Builders has a vision to create a political climate in our region that encourages profitable building through decreased regulation and lower fees; as well as more governmental accountability, transparency and efficiency. To that end, and on behalf of our members, Region Builders is pleased to provide comments on the Draft Environmental Impact Report (“DEIR”) for the City of Sacramento’s proposed Entertainment and Sports Center (“ESC”).

INTRODUCTION

Region Builders strongly supports the ESC and the unprecedented economic benefits that it will generate for the region as a whole – including more than \$11.5 billion dollars in economic activity and more than 11,700 construction related jobs associated with arena construction and ancillary development.

Region Builders has reviewed the DEIR prepared by the City and finds it to be fully compliant with the requirements of the California Environmental Quality Act (“CEQA”) and its corresponding guidelines. As such, the City is free to act on the merits of this project when it is presented for final approval. (See, e.g., *Goleta Union School Dist. v. Regents of University of California* (1995) 27 Cal.App.4th 1025, 1030 [“If the agency proceeds according to CEQA and includes the information on the environment it requires, the agency does not violate CEQA. The final decision on the merits of a project is within the hands of the agency.”].)

Therefore, the balance of this comment letter is intended to highlight specific areas of the DEIR, including the Project Description, the Global Climate Change Analysis and the



Transportation Analysis, in anticipation of the City's final review and, we trust, approval of this incredibly valuable project.

SPECIFIC DEIR COMMENTS

Project Description

The cornerstone of a legally sufficient EIR is an accurate and stable project description. (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 7 13, 727 (quoting *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193). The importance of accurate and complete project description is self-evident – it permits a complete and intelligent evaluation of a project's potential environmental consequences. (*Id.* at 730.)

As the DEIR clearly states, the proposed project includes the development of the ESC and the surrounding area, as well as the development of ten (10) potential off-site digital billboard locations. More important, however, the DEIR also clearly identifies as part of the project description the anticipated "transfer parcels" located in Natomas and at various locations throughout downtown that are associated with the overall development of the ESQ.

In total the DEIR provides nearly 100-pages of comprehensive information relative to the proposed project under consideration and unquestionably provides ample information for a complete an intelligent evaluation of the projects potential environmental impacts.

Global Climate Change

CEQA expressly requires the evaluation of the potential adverse impacts of a proposed project on global climate change and mandates that lead agencies, like the City of Sacramento, make a "good-faith effort" to evaluate a projects potential greenhouse gas emissions in conjunction with the preparation of an EIR. (CEQA Guidelines § 15064.4.)

Consistent with this requirement, the City of Sacramento has adopted a Climate Action Plan ("CAP") and corresponding Checklist to ensure that proposed projects comply with state mandates and meet the City's overall goal of reducing educating community-wide emissions by 15% below 2005 levels by 2020, 38% below 2005 levels by 2030, and 83% below 2005 levels by 2050. (Sacramento Climate Action Plan, February 14, 2012.)

The DEIR specifically evaluated the proposed project against the City's CAP Checklist and concluded that the ESC meets all seven (7) emission reduction strategies outlined in the City's overall Climate Action Plan. Specifically, the DEIR found that the proposed project would do all of the following:



1. *Meets the City's 2030 General Plan for land use and urban form, allowable floor area ratio, and density standards,*
2. *Supports less than 15.9 VMT per capita based on its proposed location,*
3. *Will be located within the Central Business District, an area where traffic calming measures are not encouraged,*
4. *Incorporates pedestrian facilities and connections to public transportation consistent with the City's Pedestrian Master Plan,*
5. *Complies with City's Bikeway Master Plan and the portions of City's Zoning Code that apply to bicycles and bike facilities,*
6. *Includes design features and mitigation measures that would reduce total energy demand by more than 15%, and*
7. *Complies with the minimum CALGreen Tier I water efficiency standards.*

(DEIR, Section 4.5 Global Climate Change, Page 16.)

The project's compliance with these strategies cannot be understated as they evidence a strict adherence to well-established smart growth principles. In addition to the construction and design features that will reduce the project's overall energy dependence, the ESC location at the heart of the City's urban core strongly supports multi-modal transportation options including pedestrian, bicycle, and transit use

Transportation

Finally, with respect to the DEIR's analysis of the project's potential transportation related impacts, we note that the non-automotive transit use associated with the project would actually increase over the project's life:

The conclusions of [the Transportation] study are that in the short term, it is estimated that approximately 10% of ESC attendees would travel with non-automotive modes, including 7% of ESC attendees using transit, about 2.5% would walk, and less than 1% would ride bicycles. In the long term, under cumulative conditions, it is anticipated that non-automotive travel would constitute 15% of



travel to and from the ESC, with transit use increasing to approximately 11%, walk increasing to 3% and bicycle use rising to 1%.

(DEIR, Summary, Page S-13.)

These estimates are likely conservative in nature and will undoubtedly improve as users and transit providers adjust to a new paradigm in regional transportation options.

Ultimately, whatever transit option individuals utilize, this valuable influx of visitors will ensure that the ESC will help activate the downtown core and will provide a catalyst for further revitalization of the City.

CONCLUSION

In summary, Region Builders appreciates the opportunity to comment on the City's DEIR. The Sacramento Entertainment and Sports Center is a once in a lifetime opportunity for this region that will yield positive economic and civic benefits for generations to come.

City staff and its environmental consultants have prepared an environmental document that clearly meets the requirements of CEQA. Therefore, we respectfully and wholeheartedly request that the City certify the EIR and approve this important project.

Sincerely,

A handwritten signature in black ink that reads "Joshua J. Wood".

Joshua Wood
Executive Director
Region Builders, Inc.