

Entertainment and Sports Center Notice of Preparation Responses (SCH# 2013042031)
As of June 4, 2013, 1:30 PM

Agencies

- 1) State Clearinghouse (SCH), April 15, 2013
- 2) California Department of Toxic Substances Control (DTSC), May 13, 2013
- 3) California Department of Transportation (Caltrans), May 13, 2013
- 4) Sacramento Metropolitan Air Quality Management District (SMAQMD), May 13, 2013
- 5) Sacramento Municipal Utility District (SMUD), May 13, 2013
- 6) Sacramento Regional County Sanitation District (SRCSD), April 24, 2013
- 7) Sacramento Regional Transit (SacRT), May 13, 2013
- 8) Yolo County Transportation District (YCTD), May 13, 2013
- 9) City of West Sacramento (WestSac), May 10, 2013

Organizations

- 1) Old Sacramento Business Association, May 13, 2013
- 2) Sacramento Area Bicycle Advocates (SABA), May 13, 2014
- 3) Sacramento Old City Association (SOCA), William Burg, April 24, 2013
- 4) Walk Sacramento, May 13, 2013
- 5) United Auburn Indian Community (UAIC), May 9, 2013
- 6) Shingle Springs Rancheria (SSBMI), May 30, 2013

Individuals

- 1) James Adams, April 24, 2013
- 2) Nicole A. Amador, April 24, 2013
- 3) Mike Barnbaum, April 24, 2013
- 4) Jean Fluery, May 11, 2013
- 5) Lynne Stevenson, May 13, 2013
- 6) George and Lana Travao, April 16, 2013
- 7) A Vojdani, April 23, 2013



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

SCH



Ken Alex
Director

Notice of Preparation

April 15, 2013

To: Reviewing Agencies
Re: Entertainment and Sports Center
SCH# 2013042031

Attached for your review and comment is the Notice of Preparation (NOP) for the Entertainment and Sports Center draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Tom Buford
City of Sacramento
300 Richards Blvd, Third Floor
Sacramento, CA 95811

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

Document Details Report
State Clearinghouse Data Base

SCH

SCH# 2013042031
Project Title Entertainment and Sports Center
Lead Agency Sacramento, City of

Type NOP Notice of Preparation
Description Construction and operation of an entertainment and sports center on approximately 18.5 acres. The proposed ESC Project would be located on the Downtown Plaza property and on other property which may be transferred to Applicant and would include demolition of portions of the existing buildings, and the construction and operation of an approximately 18,500 seat entertainment and sports center and up to 1,500,000 square feet of office, retail, housing and hotel uses at the ESC Project Site. The ESC would serve as the home for the Sacramento Kings, a National Basketball Association team, as well as a venue for other sports, entertainment and civic and cultural events.

Lead Agency Contact

Name Tom Buford
Agency City of Sacramento
Phone 916 808 7931 **Fax**
email
Address 300 Richards Blvd, Third Floor
City Sacramento **State** CA **Zip** 95811

Project Location

County Sacramento
City Sacramento
Region
Cross Streets J, K and L Streets between 3rd and 7th Street
Lat / Long
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways Interstate 5
Airports
Railways UP
Waterways Sacramento River and American River
Schools
Land Use

Project Issues Agricultural Land; Aesthetic/Visual; Air Quality; Archaeologic-Historic; Drainage/Absorption; Economics/Jobs; Fiscal Impacts; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 2; Public Utilities Commission; State Lands Commission; California Highway Patrol; Caltrans, District 3 S; Air Resources Board, Major Industrial Projects; Department of Toxic Substances Control; Regional Water Quality Control Bd., Region 5 (Sacramento); Delta Stewardship Council

Date Received 04/12/2013 **Start of Review** // **End of Review** //

01

2013042031

NOP Distribution List

County: Sacramento

SCH#

SCH

- Resources Agency
- Resources Agency
Nadell Gayou
- Dept. of Boating & Waterways
Nicole Wong
- California Coastal Commission
Elizabeth A. Fuchs
- Colorado River Board
Gerald R. Zimmerman
- Dept. of Conservation
Elizabeth Carpenter
- California Energy Commission
Eric Knight
- Cal Fire
Dan Foster
- Central Valley Flood Protection Board
James Herota
- Office of Historic Preservation
Ron Parsons
- Dept of Parks & Recreation Environmental Stewardship Section
- California Department of Resources, Recycling & Recovery
Sue O'Leary
- S.F. Bay Conservation & Dev't. Comm.
Steve McAdam
- Dept. of Water Resources Agency
Nadell Gayou
- Fish and Game
- Dept. of Fish & Wildlife
Scott Flint
- Environmental Services Division
- Fish & Wildlife Region 1
Donald Koch
- Fish & Wildlife Region 1E
Laurie Harnsberger
- Fish & Wildlife Region 2
Jeff Dronngesen
- Fish & Wildlife Region 3
Charles Armor
- Fish & Wildlife Region 4
Julie Vance
- Fish & Wildlife Region 5
Leslie Newton-Reed
- Habitat Conservation Program
- Fish & Wildlife Region 6
Gabrina Gatchel
- Habitat Conservation Program
- Fish & Wildlife Region 6 I/M
Brad Henderson
- Inyo/Mono, Habitat Conservation Program
- Dept. of Fish & Wildlife M
George Isaac
- Marine Region
- Food & Agriculture
Sandra Schubert
- Dept. of Food and Agriculture Services
- Dept. of General Services
Public School Construction
- Dept. of General Services
Anna Garbeff
- Environmental Services Section
- Dept. of Public Health
Jeffery Worth
- Dept. of Health/Drinking Water
- Delta Stewardship Council
Kevan Samsam
- Independent Commissions, Boards
- Delta Protection Commission
Michael Machado
- Cal EMA (Emergency Management Agency)
Dennis Castrillo

- Native American Heritage Comm.
Debbie Treadway
- Public Utilities Commission
Leo Wong
- Santa Monica Bay Restoration
Guangyu Wang
- State Lands Commission
Jennifer Deleong
- Tahoe Regional Planning Agency (TRPA)
Cherry Jacques
- Business, Trans & Housing
- Caltrans - Division of Aeronautics
Philip Crimmins
- Caltrans - Planning
Terri Pencovic
- California Highway Patrol
Suzann Ikeuchi
- Housing & Community Development
CEQA Coordinator
- Housing Policy Division
- Dept. of Transportation
- Caltrans, District 1
Rex Jackman
- Caltrans, District 2
Marcelino Gonzalez
- Caltrans, District 3
Gary Arnold
- Caltrans, District 4
Erik Alm
- Caltrans, District 5
David Murray
- Caltrans, District 6
Michael Navarro
- Caltrans, District 7
Dianna Watson

- Caltrans, District 8
Dan Kopulsky
- Caltrans, District 9
Gayle Rosander
- Caltrans, District 10
Tom Dumas
- Caltrans, District 11
Jacob Armstrong
- Caltrans, District 12
Marlon Regisford
- Cal EPA
- Air Resources Board
- Airport/Energy Projects
Jim Lerner
- Transportation Projects
Douglas Ito
- Industrial Projects
Mike Tollstrup
- State Water Resources Control Board
Regional Programs Unit
- Division of Financial Assistance
- State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit
- Division of Water Quality
- State Water Resources Control Board
Phil Crader
- Division of Water Rights
- Dept. of Toxic Substances Control
CEQA Tracking Center
- Department of Pesticide Regulation
CEQA Coordinator

- Regional Water Quality Control Board (RWQCB)
- RWQCB 1
Cathleen Hudson
- North Coast Region (1)
- RWQCB 2
Environmental Document Coordinator
- San Francisco Bay Region (2)
- RWQCB 3
Central Coast Region (3)
- RWQCB 4
Teresa Rodgers
- Los Angeles Region (4)
- RWQCB 5S
Central Valley Region (5)
- RWQCB 5F
Central Valley Region (5)
- RWQCB 5R
Central Valley Region (5)
- RWQCB 6
Lahontan Region (6)
- RWQCB 6V
Lahontan Region (6)
- RWQCB 7
Victorville Branch Office
- RWQCB 8
Colorado River Basin Region (7)
- RWQCB 9
Santa Ana Region (8)
- RWQCB 9
San Diego Region (9)
- Other Delta Stewardship
- Conservancy

Notice of Completion

See NOTE Below

 SCH # 2013042031

 Mail to: State Clearinghouse, 1400 Tenth Street, Suite 222, Sacramento, CA 95814
 916/445-0613

 Project Title Entertainment and Sports Center

 Lead Agency: City of Sacramento
 Address: 300 Richards Blvd., Third Floor
 City: Sacramento Zip: 95811

 Contact Person: Tom Buford
 Phone: 916 808-7931
 County: Sacramento

Project Location

 County: Sacramento City/Nearest Community: Sacramento / Central City (nearest)

 Cross Streets: J, K and L Streets between 3rd and 7th Streets, Total Acres: Approx. 18.5 acres

Assessor's Parcel No. Section: _____ Twp. _____ Range: _____

Base: _____

 Within 2 Miles: State Hwy #: Interstate 5 Waterways: Sacramento River and American River

 Airports: _____ Railways: UP Schools: _____

Document Type

CEQA:	<input checked="" type="checkbox"/> NOP	<input type="checkbox"/> Supplement/Subsequent	NEPA:	<input type="checkbox"/> NOI	Other:	<input type="checkbox"/> Joint Document
	<input type="checkbox"/> Early Cons	<input type="checkbox"/> EIR (Prior SCH No.): _____		<input type="checkbox"/> EA		<input type="checkbox"/> Final Document
	<input type="checkbox"/> Neg Dec	<input type="checkbox"/> Other: _____		<input type="checkbox"/> Draft EIS		<input type="checkbox"/> Other: _____
	<input type="checkbox"/> Draft EIR			<input type="checkbox"/> FONSI		

Local Action Type

<input type="checkbox"/> General Plan Update	<input checked="" type="checkbox"/> Specific Plan Amendment	<input type="checkbox"/> Rezone	<input type="checkbox"/> Annexation
<input type="checkbox"/> General Plan Amendment	<input type="checkbox"/> Master Plan	<input type="checkbox"/> Prezone	<input type="checkbox"/> Redevelopment
<input type="checkbox"/> General Plan Element	<input type="checkbox"/> Planned Unit Development	<input type="checkbox"/> Use Permit	<input type="checkbox"/> Coastal Permit
<input type="checkbox"/> Community Plan	<input type="checkbox"/> Site Plan	<input checked="" type="checkbox"/> Land Division (Subdivision)	<input type="checkbox"/> Other _____

Development Type

<input type="checkbox"/> Residential: Units _____ Acres _____	<input type="checkbox"/> Water Facilities: Type _____ MGD _____
<input type="checkbox"/> Office: Sq.ft. _____ Acres _____ Employees _____	<input type="checkbox"/> Transportation: Type _____
<input checked="" type="checkbox"/> Commercial: Sq.ft. <u>675,000</u> Acres <u>18</u> Employees _____	<input type="checkbox"/> Mining: Mineral _____
<input type="checkbox"/> Industrial: Sq.ft. _____ Acres _____ Employees _____	<input type="checkbox"/> Power: Type _____ Watts _____
<input type="checkbox"/> Educational _____	<input type="checkbox"/> Waste Treatment: Type _____
<input type="checkbox"/> Recreational _____	<input type="checkbox"/> Hazardous Waste: Type _____
	<input checked="" type="checkbox"/> Other: <u>Mix of Office, Retail, Residential, & Hotel uses</u> (approximately 1,500,000 Sq. Ft. within the 18.5 acres)

Project Issues Discussed in Document

<input checked="" type="checkbox"/> Aesthetic/Visual	<input checked="" type="checkbox"/> Flood Plain/Flooding	<input checked="" type="checkbox"/> Schools/Universities	<input checked="" type="checkbox"/> Water Quality
<input checked="" type="checkbox"/> Agricultural Land	<input checked="" type="checkbox"/> Forest Land/Fire Hazard	<input checked="" type="checkbox"/> Septic Systems	<input checked="" type="checkbox"/> Water Supply/Groundwater
<input checked="" type="checkbox"/> Air Quality	<input checked="" type="checkbox"/> Geologic/Seismic	<input checked="" type="checkbox"/> Sewer Capacity	<input checked="" type="checkbox"/> Wetland/Riparian
<input checked="" type="checkbox"/> Archaeological/Historical	<input checked="" type="checkbox"/> Minerals	<input checked="" type="checkbox"/> Soil	<input checked="" type="checkbox"/> Wildlife
<input type="checkbox"/> Coastal Zone	<input checked="" type="checkbox"/> Noise	<input checked="" type="checkbox"/> Erosion/Compaction/Grading	<input checked="" type="checkbox"/> Growth Inducing
<input checked="" type="checkbox"/> Drainage/Absorption	<input checked="" type="checkbox"/> Pop/Housing Balance	<input checked="" type="checkbox"/> Solid Waste	<input checked="" type="checkbox"/> Land Use
<input checked="" type="checkbox"/> Economic/Jobs	<input checked="" type="checkbox"/> Public Services/Facilities	<input checked="" type="checkbox"/> Toxic/Hazardous	<input checked="" type="checkbox"/> Cumulative Effects
<input checked="" type="checkbox"/> Fiscal	<input checked="" type="checkbox"/> Recreation/Parks	<input checked="" type="checkbox"/> Traffic/Circulation	<input type="checkbox"/> Other: _____
		<input checked="" type="checkbox"/> Vegetation	

 Present Land Use/Zoning/General Plan Use: Currently site of the Downtown Plaza Shopping Mall (Retail); **Zoning** is C-3—Central Business District Zone—Special Planning District; **General Plan Designation** is Central Business District

Project Description: Construction and operation of an entertainment and sports center on approximately 18.5 acres. The proposed ESC Project would be located on the Downtown Plaza property and on other property which may be transferred to Applicant and would include demolition of portions of the existing buildings, and the construction and operation of an approximately 18,500 seat entertainment and sports center (ESC) and up to 1,500,000 square feet of office, retail, housing and hotel uses at the ESC Project Site. The ESC would serve as the home for the Sacramento Kings, a National Basketball Association (NBA) team, as well as a venue for other sports, entertainment and civic and cultural events.

NOTE: Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g., from a Notice of Preparation or previous draft document) please fill it in.

- Resources Agency
- Boating & Waterways
- Coastal Commission
- Coastal Conservancy
- Colorado River Board
- Conservation
- Fish & Game
- Forestry & Fire Protection
- Office of Historic Preservation
- Parks & Recreation
- Reclamation Board
- S.F. Bay Conservation & Development Commission
- Water Resources (DWR)
- Business, Transportation & Housing
- Aeronautics
- California Highway Patrol
- CALTRANS District #3
- Department of Transportation Planning (headquarters)
- Housing & Community Development
- Food & Agriculture
- Health & Welfare
- Health Services
- State & Consumer Services
- General Services
- OLA (Schools)

Environmental Protection Agency

- Air Resources Board
- California Waste Management Board
- SWRCB: Clean Water Grants
- SWRCB: Delta Unit
- SWRCB: Water Quality
- SWRCB: Water Rights
- Regional WQCB #5S

Youth & Adult Corrections

- Corrections

Independent Commissions & Offices

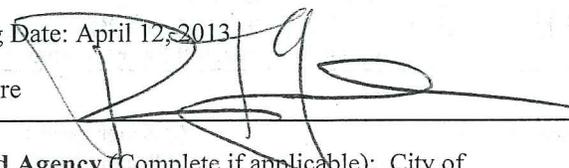
- Energy Commission
- Native American Heritage Commission
- Public Utilities Commission
- Santa Monica Mountains Conservancy
- State Lands Commission
- Tahoe Regional Planning Agency
- Other _____

Public Review Period (to be filled in by lead agency)

Starting Date: April 12, 2013

Ending Date : May 13, 2013

Signature



Date: April 9, 2013

Lead Agency (Complete if applicable): City of Sacramento
 300 Richards Blvd., Third Floor
 Sacramento, CA 95811
 Contact: Tom Buford
 Phone: 808-7931

For SCH Use Only:

Date Received at SCH: _____

Date Review Starts: _____

Date to Agencies: _____

Date to SCH: _____

Clearance Date: _____

Notes:

Applicant:



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Deborah O. Raphael, Director
8800 Cal Center Drive
Sacramento, California 95826-3200

DTSC



Edmund G. Brown Jr.
Governor

May 13, 2013

Via E-Mail Only

COMMENTS ON CITY OF SACRAMENTO'S APRIL 12, 2013 NOTICE OF PREPARATION FOR THE ENTERTAINMENT AND SPORTS CENTER DRAFT ENVIRONMENTAL IMPACT REPORT, THE RAILYARDS, SACRAMENTO, CALIFORNIA

Dear Mr. Buford:

Department of Toxic Substances Control (DTSC) has received and reviewed the April 12, 2013 Notice of Preparation (NOP) for the Entertainment and Sports Center (ESC) Draft Environmental Impact Report (EIR), State Clearinghouse Number 2013042031. DTSC appreciates the opportunity to review and comment on the NOP and is eager to participate and provide information to facilitate the implementation of the California Environmental Quality Act process at the site.

The ESC project location is an 18.5-acre parcel bounded by 3rd, 7th, J and L Streets in downtown Sacramento. A portion of the ESC bounded by 5th, 7th, J and L Streets is located above a groundwater plume called the South Plume Groundwater Study Area (South Plume) which originates from the Railyards.

The South Plume is bounded by 5th, 10th to 11th, and Q Streets and is contaminated with metals, solvents, and petroleum based compounds at depths greater than approximately 40 feet below ground surface (beneath the upper sand zone which is not impacted).

Since DTSC is providing lead regulatory oversight for the cleanup of contaminated soil and groundwater at the Railyards, our review focused on the aspects of the NOP related to the historical and ongoing remedial measures at the site. The sections titled "Hazards and Hazardous Materials" and "Hydrology and Water Quality" should consider and discuss Railyards remediation issues in the Draft EIR.

Tom Buford, TBuford@cityofsacramento.org
May 13, 2013
Page 2

DTSC

Close communication between all responsible agencies during preparation of the Draft EIR will be essential to assure the document is complete and up to date. As you are probably aware, significant cleanup and characterization activity is occurring on portions of the Railyards at this time, and more are planned. Of the designated Study Areas (which are shown on the attached figures), Remedial Action Plans (RAPs) have been completed for the Northern Shops, Central Corridor, Car Shop Nine, Sacramento Station, and Lagoon Study Area (Soil and Northwest Corner). DTSC and Regional Water Quality Control Board are currently reviewing the RAP for the Central Shops Study Area and South Plume. Also, DTSC is reviewing major documents leading to RAP approval for the Lagoon Groundwater Study Area and the former Manufactured Gas Plant on the western side of the Railyards.

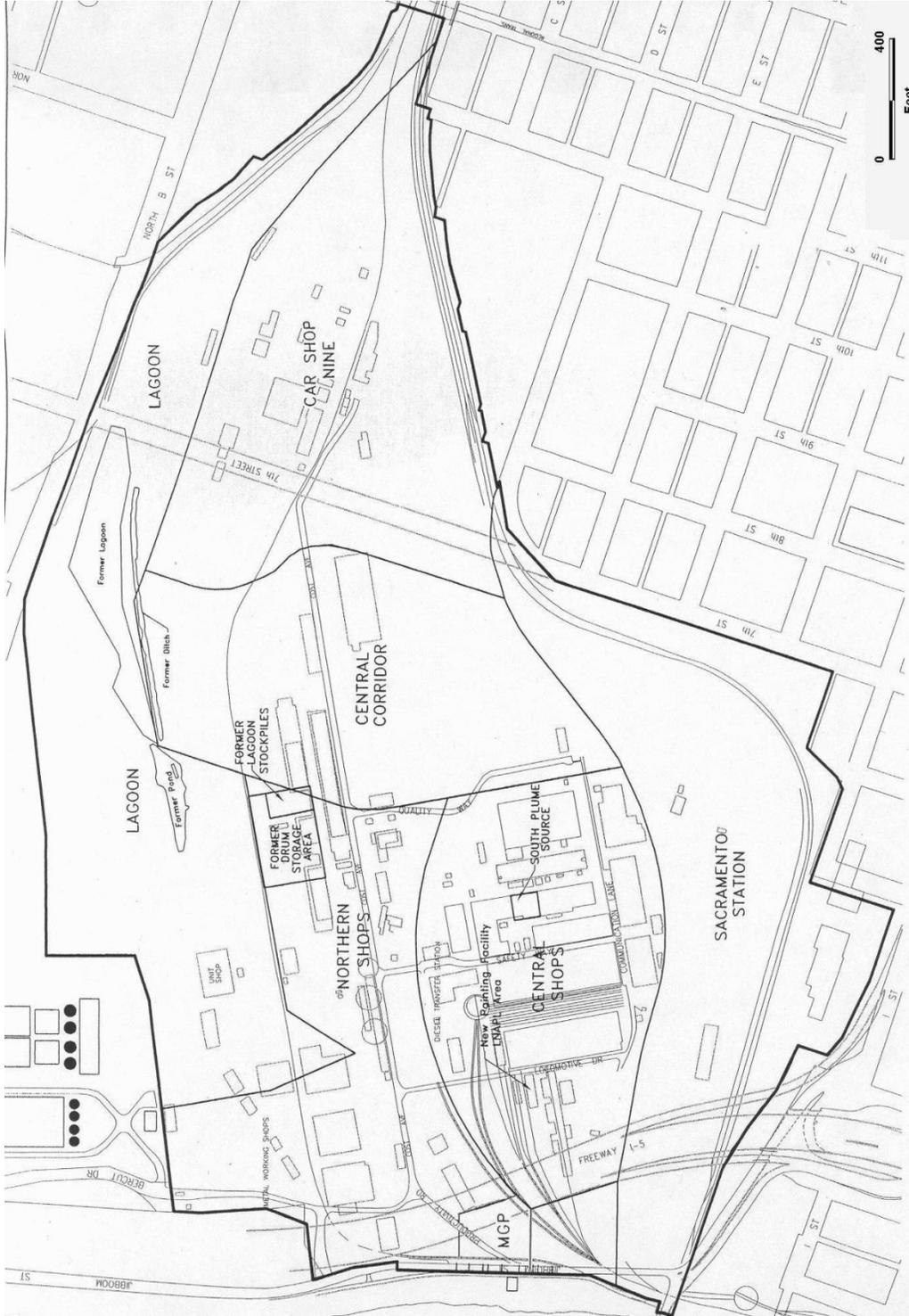
DTSC looks forward to receiving the Draft EIR for a complete review of the specific issues related to remediation of contamination at the site. As the Draft EIR project proceeds, and if you have any questions regarding site investigation and remediation, please contact me at (916) 255-3601 or Ruth.Cayabyab@dtsc.ca.gov.

Sincerely,



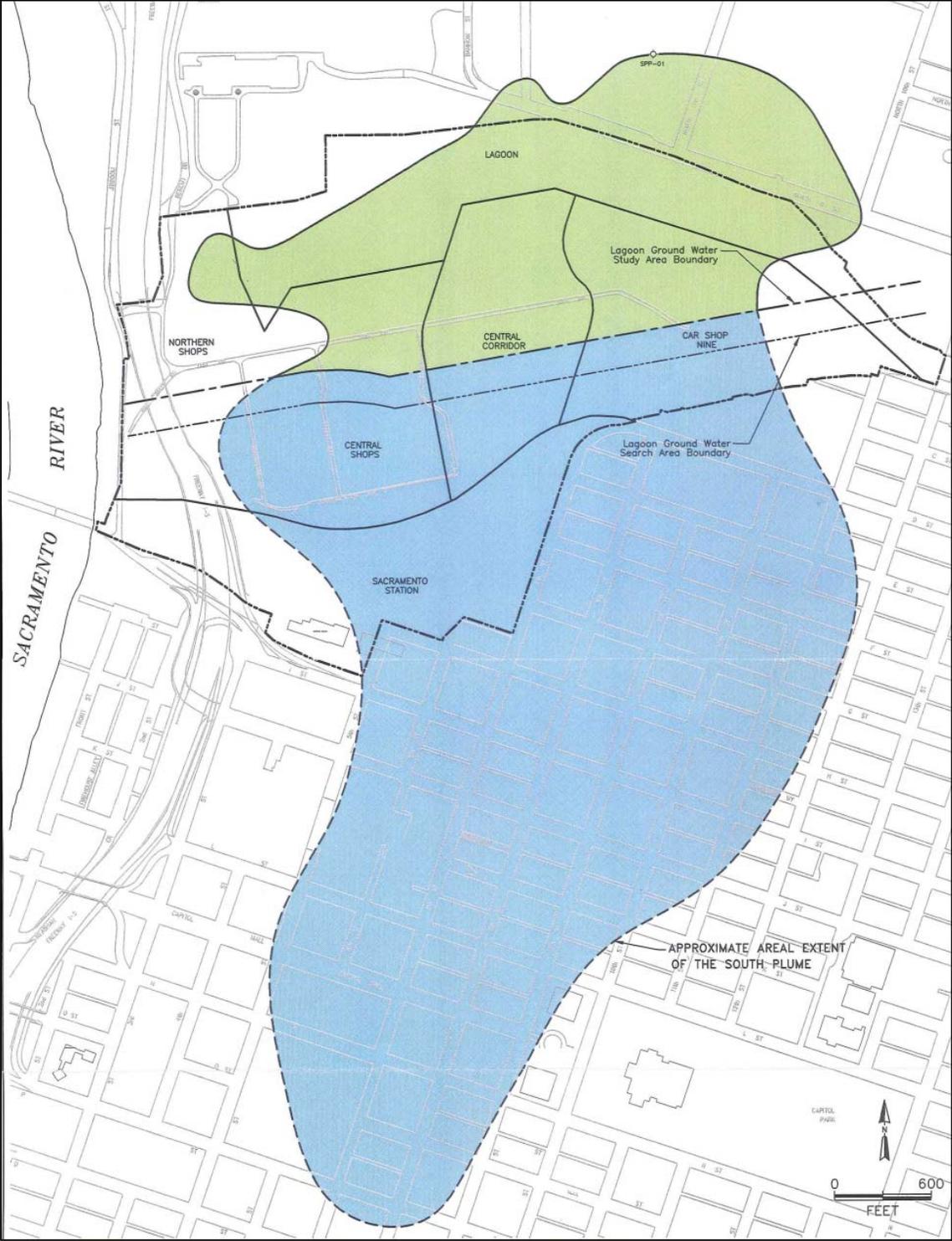
Ruth Cayabyab
Project Manager
Brownfields and Environmental Restoration Program

Attached Figure: Sacramento Railyards Study Areas (Soil)



Tom Buford, TBuford@cityofsacramento.org
May 13, 2013
Page 4

Attached Figure: Sacramento Railyards Study Areas (Groundwater)



DEPARTMENT OF TRANSPORTATION

703 B STREET
MARYSVILLE, CA 95901
PHONE (916) 274-0635
FAX (916) 274-0602
TTY 711



*Flex your power!
Be energy efficient!*

May 13, 2013

032013-SAC-0065
03-SAC-5/PM 23.53
SCH# 2013042031

Mr. Tom Buford
City of Sacramento
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

Entertainment and Sports Center Project – Notice of Preparation (NOP)

Dear Mr. Buford:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Entertainment and Sports Center (ESC) project. The project proposes to construct and operate an approximately 18,500-seat entertainment and sports center, and up to 1,500,000 square feet of office, retail, housing, and hotel uses. The ESC would serve as the home for the Sacramento Kings and as a venue for other sports, entertainment, civic and cultural events. The proposed ESC would be located on the current Downtown Plaza property and other property west of 3rd Street, east of 7th Street, south of J Street, north of L Street, and adjacent to Interstate 5 (I-5). The following comments are based on the NOP.

- Since peak hour freeway segments serving downtown Sacramento are already severely congested, restricting the scheduling of ESC events, to the maximum extent possible, to non-peak traffic times is essential.
- With travelers coming from throughout the Sacramento region to attend events at the ESC, traffic management plans should be developed and implemented for each ESC event. In addition, the use of alternative modes by ESC patrons should be strongly encouraged to the greatest extent possible, including ridesharing, park-and-ride strategies, and the use of all public transit options.
- We concur that the ESC will contribute to Sacramento's economic growth and vitality and that the ESC will contribute to a faster rate of downtown growth than the current pace. Therefore, we must expedite the construction of transportation improvement projects which serve the downtown area that are already programmed, partially programmed or partially constructed, including the ultimate configuration of the Richards Boulevard interchange, the preferred alternative projects of the American River Crossings Study, and the streetcar project between West Sacramento and Midtown Sacramento. In addition, the following traffic operations projects have been proposed and would help alleviate congestion on the freeways and improve efficiency of the State Highway System serving the ESC and downtown Sacramento:

- I-5 Auxiliary Lane, Northbound from Highway 50 ramp to P Street on-ramp;
- I-5 Transition Lane, Southbound from Garden Highway off ramp to the Garden Highway on-ramp.
- Intelligent Transportation System (ITS) projects such as changeable message signs, traveler information services, and other low-cost strategies.

We look forward to working with the City of Sacramento for the successful planning and implementation of the transportation components of the ESC. If you have any questions regarding these comments or require additional information, please contact Angela Shepard, Intergovernmental Review Coordinator, at (916) 274-0566 or by email at: angela.shepard@dot.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Eric Fredericks". The signature is written in a cursive, flowing style.

ERIC FREDERICKS, Chief
Office of Transportation Planning – South

cc: Scott Morgan, State Clearinghouse

From: JOSEPH J. HURLEY [JHURLEY@airquality.org]
Sent: Monday, May 13, 2013 3:58 PM
To: Tom Buford
Cc: LARRY ROBINSON
Subject: Entertainment and Sports Center NOP

Dear Mr. Buford,

Thank you for providing the Sacramento Metropolitan Air Quality Management District (District) with an opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the Entertainment and Sports Center (ESC). The District requests that the Environmental Impact Report (EIR) address the following issues.

- I. We recommend that the project be analyzed for its air quality impacts from both its construction and operational activities. If the air quality impacts from the project's construction activities prove to be significant, we recommend that the City require the inclusion of the District's current standard construction mitigation measures as a mitigation measure in the EIR. A copy of that mitigation is included. If, after the application of this on-site strategy, those emissions are not reduced to the District's threshold of significance, the District recommends that the project include an off-site mitigation fee using the District's standard methodology.
- II. The District anticipates that this project's operational emissions may exceed the District's threshold of 65 pounds per day of ROG or NO_x; if they do we recommend the creation of an operational air quality mitigation plan. The AQMP would be designed to reduce operational emissions by 15%. The District recommends that the plan be included as a mitigation measure in the environmental impact report. The District Additional information on AQMPs is available online at <http://www.airquality.org/ceqa/mitigation.shtml>.
- III. In the alternatives analysis, the District encourages the City to consider studying the potential benefits of providing protected bikeways and pedestrian paths connecting to ESC to the City's existing bicycle and pedestrian network in each of the cardinal directions. Designated intersections surrounding the ESC in each direction should have features to protect bicyclists and pedestrians crossing from heavy volume traffic before and after events (e.g. crossing signals specifically for bicyclists, painted bike lanes and bike boxes, advanced stop lines for vehicles, buffered bike lanes next to heavy traffic lanes, and enhanced pedestrian crossings).
Way-finding signs and pavement markings should be provided on streets approaching the ESC and through the plaza surrounding it to direct bicyclists on the most efficient routes to access the ESC and its bike-parking operation and to minimize conflicts between bicyclists and pedestrians. The EIR should consider whether these design features could mitigate some of the traffic, air pollution, and parking removal associated with the project
- IV. The site design for the ESC should include pedestrian connections, way finding, and other facilities to ensure that the ESC is well connected to light rail, bus lines, and the planned streetcar.
- V. The site design should also include flexible spaces that could accommodate regional Bike Share Kiosks, Pedi-cab operators, bikelink stations, and other innovative cycling facilities that are becoming an increasingly common in other Cities around the Country. The EIR should consider whether incorporating

these innovative cycling facilities could mitigate some of the impacts of the new traffic and air pollution associated with the project.

- VI. All projects are subject to District rules and regulations in effect at the time of construction. Please see the attached document describing District Rules which may apply to this project.
- VII. The project may result in cumulatively significant greenhouse gas (GHG) emissions during both construction and operation. Please include a climate change/GHG section which includes a discussion of the regulatory framework of GHG emissions, analyzes the GHG impact of the project, makes a determination of significance based from that framework and provides an analysis of construction and operation emissions resulting from the project. Include mitigation measures to address significant GHG emissions. Please refer to the District's CEQA Guidance, especially chapter 6 for more details.

The Sacramento Metropolitan Air Quality Management District staff thanks the City for the opportunity to present our comments. Questions regarding District comments on the EIR or on complying with the construction mitigation agreement may be sent to Joseph James Hurley at jjhurley@airquality.org.

Sincerely,

-JJ Hurley

Joseph James Hurley
Associate Air Quality Planner / Analyst
Sacramento Metropolitan Air Quality Management District

C: Larry Robinson, Program Coordinator, SMAQMD

SMAQMD Rules & Regulations Statement (revised 1/07)

*The following statement is recommended as standard condition of approval or construction document language for **all** development projects within the Sacramento Metropolitan Air Quality Management District (SMAQMD):*

All projects are subject to SMAQMD rules and regulations in effect at the time of construction. A complete listing of current rules is available at www.airquality.org or by calling 916.874.4800. Specific rules that may relate to construction activities or building design may include, but are not limited to:

Rule 201: General Permit Requirements. Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permit(s) from SMAQMD prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the District early to determine if a permit is required, and to begin the permit application process. Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc.) with an internal combustion engine over 50 horsepower are required to have a SMAQMD permit or a California Air Resources Board portable equipment registration.

Other general types of uses that require a permit include dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions.

Rule 403: Fugitive Dust. The developer or contractor is required to control dust emissions from earth moving activities or any other construction activity to prevent airborne dust from leaving the project site.

Rule 417: Wood Burning Appliances. Effective October 26, 2007, this rule prohibits the installation of any new, permanently installed, indoor or outdoor, uncontrolled fireplaces in new or existing developments.

Rule 442: Architectural Coatings. The developer or contractor is required to use coatings that comply with the volatile organic compound content limits specified in the rule.

Rule 902: Asbestos. The developer or contractor is required to notify SMAQMD of any regulated renovation or demolition activity. Rule 902 contains specific requirements for surveying, notification, removal, and disposal of asbestos containing material.

SMAQMD Recommended Mitigation for Reducing Emissions from Heavy-Duty Construction Vehicles

Apply only to projects with construction emissions above the CEQA Threshold of Significance.

Revised December 1, 2008

Category 1: Reducing NOx emissions from off-road diesel powered equipment

The project shall provide a plan, for approval by the lead agency and SMAQMD, demonstrating that the heavy-duty (> 50 horsepower) self-propelled off-road vehicles to be used in the construction project, including owned, leased and subcontractor vehicles, will achieve a project wide fleet-average 20 percent NOx reduction and 45 percent particulate reduction¹ compared to the most recent CARB fleet average at time of construction; and

The project representative shall submit to the lead agency and SMAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the construction project. The inventory shall include the horsepower rating, engine production year, and projected hours of use for each piece of equipment. The inventory shall be updated and submitted monthly throughout the duration of the project, except that an inventory shall not be required for any 30-day period in which no construction activity occurs. At least 48 hours prior to the use of subject heavy-duty off-road equipment, the project representative shall provide SMAQMD with the anticipated construction timeline including start date, and name and phone number of the project manager and on-site foreman.

and:

Category 2: Controlling visible emissions from off-road diesel powered equipment

The project shall ensure that emissions from all off-road diesel powered equipment used on the project site do not exceed 40 percent opacity for more than three minutes in any one hour. Any equipment found to exceed 40 percent opacity (or Ringelmann 2.0) shall be repaired immediately, and the lead agency and SMAQMD shall be notified within 48 hours of identification of non-compliant equipment. A visual survey of all in-operation equipment shall be made at least weekly, and a monthly summary of the visual survey results shall be submitted throughout the duration of the project, except that the monthly summary shall not be required for any 30-day period in which no construction activity occurs. The monthly summary shall include the quantity and type of vehicles surveyed as well as the dates of each survey. The SMAQMD and/or other officials may conduct periodic site inspections to determine compliance. Nothing in this section shall supercede other SMAQMD or state rules or regulations.

and/or:

If at the time of construction, the SMAQMD has adopted a regulation applicable to construction emissions, compliance with the regulation may completely or partially replace this mitigation. Consultation with SMAQMD prior to construction will be necessary to make this determination.

¹Acceptable options for reducing emissions may include use of newer model year engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available.



May 13, 2013

Mr. Tom Buford, Senior Planner
City of Sacramento Community Development Department,
300 Richards Blvd., Third Floor
Sacramento, CA 95811

Subject: Notice of Preparation of an Environmental Impact Report for the Entertainment and Sports Complex

Dear Mr. Buford,

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Notice of Preparation (NOP) for the Environmental Impact Report (EIR) for the Entertainment and Sports Complex (ESC). SMUD is the primary energy provider for Sacramento County and the proposed project location. SMUD's vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed project limits the potential for significant environmental effects on SMUD facilities, employees, and customers.

It is our desire that the Entertainment and Sports Complex EIR will acknowledge any project impacts related to the following:

- Overhead and or underground transmission line easements
- Electrical load needs/ requirements
- Energy Efficiency
- Utility line routing
- Climate Change

Based on our review of the NOP and our understanding of the proposed project, SMUD offers the following input:

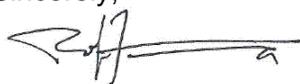
1. **Project Description:** SMUD would like to be kept aware of any potential impact of the proposed project on SMUD facilities. It is important that information regarding potential impacts to SMUD facilities in the vicinity of the proposed project be contained in the project description chapter of the EIR, as well as the existing setting discussion of the utilities, hazards and hazardous materials, and cumulative impact sections. SMUD currently has extensive subsurface utility infrastructure located throughout the project area and looks forward to continuing our partnership with the City in finding solutions to avoiding any impacts to these facilities.

2. **Project Schedule:** SMUD would like to see a discussion of the project timing/phasing included in the EIR.
3. **Energy Delivery (Capacity):** Please continue to coordinate with SMUD staff regarding the proposed energy delivery assumptions associated with the proposed project site. The EIR should provide analysis regarding SMUD's ability to handle the project's anticipated energy needs. SMUD is looking forward to partnering with the City to ensure that the project is designed in an energy efficient and sustainable way.
4. **Energy Delivery (Infrastructure):** The EIR should provide an analysis of the proposed on-site and off-site energy infrastructure improvements needed to construct and operate the proposed project. The EIR should clearly delineate the responsibilities of SMUD and the City of Sacramento, as it pertains to infrastructure improvements.

SMUD would like to be kept apprised of the planning, development, and completion of this project. We aim to be partners in the efficient and sustainable delivery of the proposed project. Please ensure that the information included in this response is conveyed to the project planners and the appropriate project proponents.

Environmental leadership is a core value of SMUD and we look forward to collaborating with you on this project. Again, we appreciate the opportunity to provide input on the NOP. If you have any questions regarding this letter, please contact Jose Bodipo-Memba, SMUD Environmental Specialist at (916) 732-6493. Jose will be the primary environmental point of contact for SMUD on this project.

Sincerely,



Rob Ferrera
Environmental Specialist
Environmental Management
Legislative & Regulatory Affairs
Sacramento Municipal Utility District

Cc: Jose Bodipo-Memba
Pat Durham
Steve Johns
Beth Tincher
Lourdes Jimenez-Price
Jarrod Burch



Main Office

10060 Goethe Road
Sacramento, CA 95827-3553
Tele: [916] 876-6000
Fax: [916] 876-6160

Sacramento Regional Wastewater

Treatment Plant

8521 Laguna Station Road
Elk Grove, CA 95758-9550
Tele: [916] 875-9000
Fax: [916] 875-9068

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April 24, 2013

Mr. Tom Buford
City of Sacramento - Community Development Department
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

Subject: Notice of Preparation of an Environmental Impact Report for the Entertainment and Sports Center Project

Dear Mr. Buford:

Sacramento Regional County Sanitation District (SRCSD) has reviewed the subject document and has the following comments.

The proposed Entertainment and Sports Center Project (ESC) would be located at the Downtown Plaza property and on additional properties that may be transferred to the applicant. The project will require demolition of portions of existing buildings, the construction and operation of an approximately 18,500 seat entertainment and sports center and up to 1,500,000 square feet of office, retail, housing, and hotel uses at the ESC Project site. The ESC would serve as home for the Sacramento Kings, a National Basketball Association team (NBA), as well as a venue for other sports, entertainment, and civic and cultural events.

Local sewer service for the proposed project site will be provided by the City of Sacramento's local sewer collection system. Ultimate conveyance to the Sacramento Regional Wastewater Treatment Plant (SRWTP) will be provided via the City Interceptor. Cumulative impacts of the proposed development will need to be quantified by the developer to ensure adequate wet weather and dry weather capacity within the City Interceptor.

In March 2013, the SRCSD Board of Directors adopted the Wastewater Operating Agreement between the SRCSD and the City of Sacramento (City).

Section 3.H. Combined Wastewater Control System (CWCS) ALLOWABLE FLOW ALLOCATIONS of the Wastewater Operating Agreement states:

SRCSD agrees to operate SRCSD facilities as necessary to accept flows via the CITY Interceptor from CITY service areas up to the maximum instantaneous flow rates indicated in the table below:

Mr. Tom Buford
 April 24, 2013
 Page 2

<u>Service Area</u>	<u>Maximum Flow Rate</u>
Sump 2 and 2A	60 MGD
Sump 2, 2A, 21, 55, and 119	98 MGD
Total combined flows to City Interceptor from Sumps 2, 2A, 21, 55, 119, and five (5) trunk connections	108.5 MGD

Total flow to the City Interceptor from the five trunk connections may exceed 10.5 MGD so long as the City does not exceed the 108.5 total flow limitations set forth in the Wastewater Operating Agreement. The City and SRCSD will monitor flow conditions and will coordinate operations of their respective facilities, to the extent feasible for each party, to prevent or reduce the risk of SSOs in their respective facilities.

The SRCSD Board of Directors adopted the Interceptor Sequencing Study (ISS) in February 2013. The ISS updated the SRCSD Master Plan 2000 and can be found on the SRCSD website at <http://www.sresd.com/interceptor-study.php>.

SRCSD is not a land-use authority. SRCSD sewer systems are designed using predicted wastewater flows that are dependent on land use information provided by each land use authority. Projects identified within SRCSD planning documents are based on growth projections provided by land-use authorities. Sewer studies, including points of connection and phasing information will need to be completed to fully assess the impacts of any project that has the potential to increase existing or future flow demands. Onsite and offsite impacts associated with constructing sanitary sewers facilities to provide service to the subject project must be included in environmental impact reports.

The SRWTP provides secondary treatment using an activated sludge process. Incoming wastewater flows through mechanical bar screens through a primary sedimentation process. This allows most of the heavy organic solids to settle to the bottom of the tanks. These solids are later delivered to the digesters. Next, oxygen is added to the wastewater to grow naturally occurring microscopic organisms, which consume the organic particles in the wastewater. These organisms eventually settle on the bottom of the secondary clarifiers. Clean water pours off the top of these clarifiers and is chlorinated, removing any pathogens or other harmful organisms that may still exist. Chlorine disinfection occurs while the wastewater travels through a two mile “outfall” pipeline to the Sacramento River, near the town of Freeport, California. Before entering the river, sulfur dioxide is added to neutralize the chlorine. The design of the SRWTP and collection system was balanced to

Mr. Tom Buford
April 24, 2013
Page 3

have SRWTP facilities accommodate some of the wet weather flows while minimizing idle SRWTP facilities during dry weather. The SRWTP was designed to accommodate some wet weather flows while the storage basins and interceptors were designed to accommodate the remaining wet weather flows.

A new NPDES Discharge Permit was issued to Sacramento Regional County Sanitation District (SRCSD) by the Central Valley Regional Water Quality Control Board (Water Board) in December 2010. In adopting the new Discharge Permit, the Water Board required SRCSD to meet significantly more restrictive treatment levels over its current levels. SRCSD believes that many of these new conditions go beyond what is reasonable and necessary to protect the environment, and has appealed the permit decision to the State Water Resources Control Board. A decision on that appeal has not yet occurred. In the meantime, SRCSD is required to begin the necessary activities, studies and projects to meet the new permit conditions. All new treatment facilities must be completed by 2020.

Customers receiving service from SRCSD are responsible for rates and fees outlined within the latest SRCSD ordinance. Fees for connecting to the sewer system are set up to recover the capital investment of sewer and treatment facilities that serves new customers. The SRCSD ordinance is located on the SRCSD website at <http://www.srcsd.com/ordinances.php>.

If you have any questions regarding this letter, please feel free to contact me at (916) 876-6104 or by e-mail at armstrongro@sacsewer.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robb Armstrong', written over a horizontal line.

Robb Armstrong
Sacramento Regional County Sanitation District

RA: ra(ra)



Regional Transit

**Sacramento Regional
Transit District**
A Public Transit Agency
and Equal Opportunity Employer

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Sacramento, CA 95812-2110

Administrative Office:

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(916) 321-2800
(29th St. Light Rail Station/
Bus 38,38,50,67,68)

Light Rail Office:

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May 13, 2013

Tom Buford
Senior Planner
City of Sacramento, Community Development Department
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

Subject: Entertainment and Sports Center Notice of Preparation

Dear Mr. Buford,

Thank you for the opportunity to review the Notice of Preparation for the Environmental Impact Report (EIR) for the Entertainment and Sports Center (ESC). In order for Regional Transit (RT) to be able to provide specific comments and questions on issues that should be addressed in the EIR, the City will need to provide a site plan, pedestrian flow plan, a traffic circulation plan and a downtown parking plan for the project. RT staff would like to meet with City staff to discuss the use of transit for this project.

We anticipate that there will be a large demand for transit service from events at this facility. In order to develop a quality transit service, RT must be brought into the site design and circulation planning process early. Transit has never been a priority method of transportation serving the existing arena. This new proposed site is being placed in a location surrounded by existing transit service; but it is a level of service and facilities that was not designed to handle event loads. Therefore, proper planning needs to take place to determine how the current transit service needs to be augmented so it can be fully taken advantage of by event goers.

Potentially 20% of attendees might use transit; out of the proposed 18,500 attendees, 3,700 people would need to be accommodated between light rail, streetcar, bus and paratransit. As a comparison, currently, the three St. Rose stations on K Street (at 7th, 8th and 9th streets) make up the most centrally located station in RT's transit system. Combined, they are RT's second most heavily used station, accounting collectively for an average of 3,200 boardings and approximately 3,400 alightings per weekday. Impacts that this project will have on the transit system that should be analyzed include:

- How many additional peak vehicles will be needed?
- How many wheel chair/transit users will need to be accommodated? Light rail capacity is very limited and will need to be supplemented by full size and paratransit buses.
- What will the impacts be during commuter times from weekday events when the trains are already full?
- How much space will be needed for queuing, passenger waiting areas for light rail and bus passengers as well as paratransit loading areas?
- Where will staging vehicles be parked?
- How will downtown circulation be affected?
- Will the City permit/plan events at the ESC that would necessitate transit services beyond RT's regular operating hours? If so, how would RT's costs be covered?

RT would like to work closely with the City to look at how we can re-design and expand the transit system to serve the ESC appropriately. It may require a phased-in approach; but we owe it to the community to have a well-thought out plan.

Please send any subsequent documents and hearing notices that pertain to this project as they become available. To set up a meeting or if you have further questions regarding these comments, please contact Traci Canfield at (916) 556-0514 or tcanfield@sacrt.com.

Sincerely,



RoseMary Covington
AGM of Planning and Transit System Development

- c: John Dangberg, City Manager, City of Sacramento
Jerry Way, Director of Transportation, City of Sacramento
Mike Wiley, GM/CEO, RT
Mark Lonergan, Chief Operating Officer, RT
Mike Mattos, Chief of Facilities and Business Support Services, RT
Diane Nakano, AGM of Engineering and Construction, RT
Traci Canfield, Planner, RT

From: Erik Reitz [ereitz@yctd.org]
Sent: Monday, May 13, 2013 4:26 PM
To: Tom Buford
Subject: potential significant environmental effects of the ESC Project

Tom,

Thank you for the opportunity to review the Entertainment and Sports Center (ESC) project located in downtown Sacramento north of L Street, south of J Street, west of 7th Street and east of 5th Street. As you may know, Yolo County Transportation District (YCTD) has a variety of responsibilities in Yolo County including administering Yolobus and Yolobus Special, Yolo County's mass transit and paratransit service, acting as Yolo County's Congestion Management Agency and overseeing transportation planning throughout Yolo County. YCTD appreciates the location and need for this project.

YCTD requests that the EIR review the effects on mass transit in particular the increase in the number of Yolo County resident using Yolobus and Yolobus Special to attend Kings games and other events held at the proposed project.

If you have any questions or need any more information please feel to contact me anytime.

Thank you,
Erik J. Reitz
Associate Transportaton Planner
Yolo County Transportation District
350 Industrial Way
Woodland, CA 95776
Desk 530-402-2826
Fax 530-661-1732
ereitz@yctd.org



CITY HALL

1110 West Capitol Avenue
West Sacramento, CA 95691

City Council
City Manager
City Clerk
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(916) 617-4500

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Development Engineering
(916) 617-4645
Building
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Redevelopment
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Housing & Community
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(916) 617-4567

Parks & Recreation

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2040 Lake Washington Blvd.
West Sacramento, CA 95691
(916) 617-4600
Fax (916) 371-5017

POLICE

550 Jefferson Boulevard
West Sacramento, CA 95605
(916) 617-4900

Code Enforcement

(916) 617-4925

PUBLIC WORKS

Operations
1951 South River Road
West Sacramento, CA 95691
(916) 617-4850

May 10, 2013

Tom Buford, Senior Planner
City of Sacramento, Community Development Department
300 Richards Boulevard, Third Floor
Sacramento, CA 95811

Re: Entertainment and Sports Center Notice of Preparation

Dear Mr. Buford:

The City of West Sacramento is encouraged to see the Entertainment and Sports Center (ESC) project restarted. The project will certainly have benefits of regional significance. To assist Sacramento in preparing the EIR for ESC, the City of West Sacramento has the following comments and recommendations:

1. The EIR should evaluate the proposed route and operation of the Downtown/Riverfront Streetcar. This regional circulator provides connections between West Sacramento, the intermodal station, the Capitol, the Convention Center, and Midtown. The streetcar project could both mitigate traffic and air quality impacts and could extend the economic benefit of the ESC far beyond its localized impact by providing riders an easier method to connect destinations. The streetcar would also provide easy access to West Sacramento parking facilities for events at the ESC.
2. The EIR should evaluate light rail operations for Raley Field since light rail access to Raley Field is being considered as part of the Downtown/Riverfront Streetcar project. This could mitigate potential traffic impacts associated with dual events at both venues. Light rail to Raley field connected to the ESC would also provide easy access to West Sacramento parking facilities' for events at the ESC.
3. The cumulative analysis should account for planned development in the City's Washington and Bridge District neighborhoods.
4. The EIR should analyze the need for a new bridge(s) over the Sacramento River, especially the Broadway Bridge. Diverting some ESC traffic (all modes) via that alternative may reduce impacts on the I5-US50 interchange, the on/offramps on I5 and 5th St of US50, and the Tower Bridge.
5. The following intersections should be studied employing West Sacramento level of service thresholds and include any air quality impacts that may result:
 - a) 3rd & Tower Bridge Gateway
 - b) 5th & Tower Bridge Gateway



- c) Garden St &
Tower Bridge
Gateway
 - d) 3rd & C Streets
 - e) 3rd & E Streets
 - f) 3rd & F Streets
 - g) 3rd & G Streets
 - h) Bridge St &
South River Rd
 - i) Jefferson Blvd &
US 50
 - j) 5th & C Streets
6. The proposed ESC may have an impact on the following bridges, freeways and regional facilities. Potential impacts to these facilities should be examined in the traffic analysis and the risk of upset and air quality sections of the EIR:
- a) Tower Bridge Operations
 - b) I Street Bridge Operations
 - c) Interstate 5 Operations
 - d) US 50 Operations
 - e) Raley Field Operations
7. Transit operations for Yolo County Transit District that serve West Sacramento and Downtown Sacramento during both peak hour and regular operations may be impacted by the ESC. The EIR for the ESC should analyze the impact upon the following transit routes:
- a) Yolobus Routes 41,42
 - b) Yolobus Route 340
8. The proposed ESC may eliminate parking spaces to construct the project and may utilize parking facilities during events both in Sacramento and West Sacramento. The environmental analysis for the ESC should analyze the impact upon the following West Sacramento parking facilities, traffic impacts associated with accessing these facilities and the air quality impacts surrounding each of these facilities/districts:
- a) Ziggurat Parking Garage
 - b) Raley Field Parking
 - c) West Sacramento Riverfront
Hotel/Conference Center Parking
 - d) Washington Neighborhood
 - e) Bridge District
9. West Sacramento bike routes connect to downtown Sacramento bike routes and reduce vehicle trips, congestion and incrementally improve air quality. The EIR should analyze the following regional bike routes as they relate to trips originating or ending in West Sacramento. The EIR should analyze the air quality impacts of the potential elimination or increase in difficulty of accessing of any of these routes:
- a) K Street Pedestrian Tunnel to I Street Bridge
 - b) American River Bike Trail through West Sacramento
10. Impacts on response times for fire and police resulting from congestion in and around the ESC should be evaluated. This analysis should include West Sacramento mutual aid to Sacramento and Sacramento mutual aid to West Sacramento.
11. The recreation chapter of the EIR should address potential impacts to the West Sacramento Riverwalk Park resulting from additional demand.

The City of West Sacramento believes there are a number of projects and programmatic solutions that could improve traffic, risk of upset air quality and other transportation impacts in the downtown core, including West Sacramento. We recommend that the EIR analyze the following potential solutions to impacts that may be created by the project:

1. Joint Comprehensive Parking Program-The two cities have started talks regarding shared services for parking in the downtown core. Implementation of this shared service would provide better coordination for parking which would lessen impacts arising from the ESC on traffic and parking operations.
2. Regional Bike Share – the regional bike share project, of which both West Sacramento and Sacramento are members could reduce vehicle trips at the ESC if bike share facilities are included as part of the project.
3. I Street Bridge Replacement Project – Both cities have jointly obtained funding for the replacement of the I Street Bridge. This project could improve access between the project area and West Sacramento.
4. Bi-City Traffic Signal Synchronization/Connection- both cities employ automated traffic management systems. Coordination of these traffic signals could lessen traffic impacts created by the ESC.
5. Emergency Evacuation Plan Coordination- emergency evacuation plans for both cities have traditionally not been coordinated. With the local of two large public facilities (Raley Field and the ESC), emergency evacuation plans should be coordinated to prevent problems in the event of a disaster in the downtown core area including West Sacramento.

Thank you for sending the NOP to the City of West Sacramento. We appreciate the opportunity to provide early input on the project. If you have any questions, please contact me or David Tilley at (916) 617-4645 or via email at charlineh@cityofwestsacramento.org or davidt@cityofwestsacramento.org.

Sincerely,



Charline R. Hamilton
Community Development Director

Cc: Martin Tuttle, City Manager
Greg Fabun, Director of Public Works
Al Terrell, Fire Chief
Bob Johnston, Director of Recreation & Parks
Dan Drummond, Police Chief
Mike Luken, Transportation Manager



May 13, 2013

ATTN: Tom Buford, Senior Planner
Community Development Department
City of Sacramento

Re: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT
FOR THE ENTERTAINMENT AND SPORTS CENTER

Mr. Buford,

Below are comments on behalf of the Board of Directors of the Old Sacramento Business Association regarding areas of potential impact on the historic riverfront district by construction of an Entertainment and Sports Center in the vicinity of K and 5th streets that we believe should be studied as part of the Environmental Impact Report.

Old Sacramento is not only where the City of Sacramento began, but it is a Nationally Recognized Historic District. The significance on our past must be preserved for future generations to understand where we started. This district has come a long way in the last several years to ensure its economic vitality which allows its historic story to be told. The impact of the Entertainment and Sports Center (ESC) will be significant to the district. If done properly the impact will allow the district and the City to keep intact its National Historic Landmark status. If done wrong, it will cut off the district from the rest of the city and negatively impact the area.

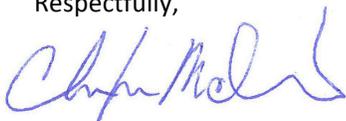
We believe that by working together and considering the impacts on Old Sacramento throughout the entire process, we can create a state-of-the-art ESC while maintaining the integrity and economic vitality of Old Sacramento. We believe that the Environmental Impact Report outlined in the Notice of Preparation issued by the City of Sacramento should consider the follow items:

- Impacts on off-street and on-street parking capacity and parking rates in Old Sacramento for visitors and employees. Specific areas that need to be addressed include:
 - Weekend afternoons during family friendly events at the ESC (e.g. Disney on Ice, circus, etc.) and afternoon sporting events, when Old Sacramento is filled with large crowds.
 - Special events and holidays in the Historic District.
 - How will evening events at the ESC affect parking for the merchants of Old Sacramento?
 - What will the effect be on parking when there are large events at both the ESC and Raley field simultaneously? What if there is a major event in Old Sacramento too?
- Impacts on traffic flow in the Old Sacramento area during arrival and departure times at the ESC, particularly during rush hours. Items to be considered and addressed include:
 - I-5 on-ramp at I Street is currently primary vehicular entry point into Old Sacramento.
 - I-5 off-ramp at J Street has proven to have backlogs during large Downtown events currently. How will the ESC and a potential reduction in off-street parking affect traffic flow exiting Interstate 5? (There currently is an event traffic flow plan that attempts to redirect significant amounts of I-5 traffic to Downtown Plaza.)
 - The intersection at 3rd and L serves access to I-80 westbound including the Tower Bridge, but also Old Sacramento. What are the traffic impacts on access into and out of Old Sacramento?

- Will temporary or permanent changes to one-way and two-way streets be necessary to control incoming and outgoing traffic to the ESC and how will these changes affect access to Old Sacramento?
- When there is an event at the ESC and a large event that closes the streets in Old Sacramento, how will traffic in Downtown be affected?
- What will be the effect be on traffic flow when there are large events at both the ESC and Raley field simultaneously? What if there is a major event in Old Sacramento too?
- Future improvements:
 - Will the ESC (combined with the proposed 2nd and Capitol connector) create traffic taking a "shortcut" through Old Sacramento before, during and after ESC events?
 - Will the ESC affect the ULI proposal to remove the I Street and Jiboom Street viaducts?
- Connectivity:
 - The connectivity of the ESC to Old Sacramento needs to be done in an attractive, convenient matter. This includes the tunnel access under I – 5 as well as pedestrian access along the streets.
- Economic impacts on businesses in Old Sacramento:
 - How will events at an ESC impact businesses in Old Sacramento that are not complementary to the ESC? While it may be presumed that bars, restaurants, hotels and some shops would benefit from pre- and post-game and concert attendance, other businesses (comedy clubs, museums, some specialty retail) could be displaced. Will this shift in usage substantively change the character of a cultural asset?
 - What is the impact of added retail around the ESC on businesses in Old Sacramento?
 - Will an ESC on K between 5th and 7th, further disrupt the flow of foot traffic from the business centers Downtown into Old Sacramento at times when there is not an event in the ESC? Will it create a "dead-zone?"
- Construction process
 - What impact of vibration and noise will the construction of the ESC have on Old Sacramento and specifically its older historic buildings?
 - During constructions, what impacts of potential traffic interruptions or street closures have on Old Sacramento?
- What visual impact will the ESC have on the Historic District?
- With the increase in population density both permanently and for event nights at the ESC, how will the current levels of public safety ensure safety for both the new ESC district and Old Sacramento.

We look forward to seeing the answers to our questions incorporated into the EIR. Once addressed, we look forward to working with all the parties involved to get the ESC developed and help Sacramento work to reach its potential as a great city.

Respectfully,



Christopher McSwain
Executive Director

SABA

From: Jordan Lang [<mailto:jordan.lang@att.net>]
Sent: Monday, May 13, 2013 9:59 AM
To: Tom Buford
Cc: Ed Cox; Joseph Hurley
Subject: Comment letter on NOP for Entertainment and Sports Center

Hello Mr. Buford: Attached is a comment letter from the Sacramento Area Bicycle Advocates (SABA) regarding the Notice of Preparation for the Environmental Impact Report on the proposed Entertainment and Sports Center (ESC).

The letter recommends that the project provide approaches to the ESC that protect bicyclists and pedestrians separately from vehicles to mitigate congestion before and after events at the ESC. Attached are 2 photos from the vicinity of the Lucas Oil Stadium in Indianapolis, IN that illustrate features that should be considered as part of the ESC project:

- separated bike lane and pedestrian path marked by brick paving pattern at intersection crossing, and
- bike lane buffered by street curb and separate pedestrian path approaching the stadium.

Thank you for considering our comments.

Jordan Lang
Project Analyst
SABA



May 13, 2013

Tom Buford, Senior Planner
City of Sacramento, Community Development Department
300 Richards Boulevard, Third Floor
Sacramento, CA 95811
TBuford@cityofsacramento.org

Subject: Notice of Preparation (NOP) of the Environmental Impact Report (EIR) for the Entertainment and Sports Center (ESC)

Dear Mr. Buford:

Thank you for the opportunity to comment on the subject NOP. We are quite excited that a downtown location for an ESC presents a multitude of options for transportation and parking management that are not available for a suburban location.

The ESC will be a signature facility for the entire Sacramento region for the next 30 years or more. It is critical that it be designed, built, and operated in a manner that facilitates the evolution of our transportation patterns over that period. For example, it must support a much increased travel mode share by bicycle into the long term future, especially in Sacramento where both topography and weather are favorable for bicycle travel. Bicycle access to the ESC must be safe, convenient, and desirable.

For the EIR analysis, the proposed ESC will have a significant adverse impact on bicycling if it "fails to adequately provide for access by bicycle." A failure to provide adequate access for bicyclists will occur if the project does not have these elements:

- Bicycle parking that is secure and convenient for attendees at ESC events equivalent to the biking-mode share goal of the City's Climate Action Plan, and
- Bikeway approaches to the ESC that are safe and comfortable for bike riders of all ages to connect from and to the surrounding bikeway network.

Being familiar with traffic patterns and driver behavior before and after sports events at the current North Natomas Arena, we can expect that traffic to and from the proposed ESC will constitute a significant impact on the downtown environment and will require substantial mitigation. Ensuring excellent bicycle access to the ESC will contribute substantially to that mitigation.

Bicycle Parking. Providing monitored bicycle parking (also known as valet bike parking) will be a crucial way to ensure bicycle access to the ESC. We request that the ESC model its

monitored bicycle parking after that required by the San Francisco Municipal Transportation Agency (see description at <http://www.sfmta.com/cms/vclos/13487.html>) and provided at San Francisco's AT&T Park. Initially, the monitored bike parking should have a capacity for at least 1% of ESC attendees and be expandable to at least 5% of attendees by 10 years after the start of ESC operations.

The monitored bicycle parking for ESC events should be located near one or more of the primary entrances to the ESC, should be promoted in all transportation information about the ESC, should be shown on all maps of ESC events, and should be known to all ESC event personnel.

Stations of the region's future bike-share system should also be located near the ESC for use of facility employees and visitors during non-event hours (e.g. visitors who might use the bike-share system to get from the Amtrak station to the ESC). Also, secure long-term and short-term parking must be provided for employees and visitors, respectively, during non-event hours (equivalent to 5% of the number of regular employees on site; equivalent to 5% of expected short-term visitors to the ESC during non-event hours).

Bikeway Approaches. Traffic stress induced by high speed and high volume vehicle traffic, as will be typical before and after ESC sports events, is the primary impediment to large numbers of people being willing to use bicycling for everyday transportation (Mekuria et al. 2012; Goodyear 2012; Geller n.d.). Women in particular are likely to be very susceptible to traffic stress because of concerns about personal safety and traffic risks, explaining the current large and increasing gender differences in bicycling participation (Garrard et al. 2012).

It therefore is important that the ESC provide approaches for bicyclists that are safe, comfortable, and protected from traffic stress. One of these bikeway approaches should connect in each of the cardinal directions to the City's bike-friendly network: to the east to Midtown, to the south to Southside and Land Park neighborhoods, to the west to the Sacramento River Bike Path and West Sacramento, and to the north to the Railyard district, Natomas, and North Sacramento.

Designated intersections surrounding the ESC in each direction should have features to protect bicyclists crossing what will be heavy volume traffic streets before and after events (e.g. crossing signals specifically for bicyclists, painted bike lanes and bike boxes, advanced stop lines for vehicles, buffered bike lanes next to heavy traffic lanes, and enhanced pedestrian crossings).

Way-finding signs and pavement markings should be provided on streets approaching the ESC and through the plaza surrounding it to direct bicyclists on the most efficient routes to access the ESC and its bike-parking operation and to minimize conflicts between bicyclists and pedestrians.

We recommend that providing high-quality, convenient bicycle facilities be considered as a way to mitigate traffic, air quality, and greenhouse gas impacts of the ESC, whether or not those impacts are considered significant.

SABA works to ensure that bicycling is safe, convenient, and desirable for everyday transportation. Bicycling is the healthiest, cleanest, cheapest, quietest, most energy efficient, and least congesting form of transportation.

Thank you for considering our comments.

Sincerely,



Jordan Lang
Project Analyst

CC Joseph Hurley, SMAQMD (jhurley@airquality.org)
Ed Cox, City of Sacramento Alternate Modes Coordinator
(ecox@cityofsacramento.org)

Citations:

Garrard, Jan, Susan Handy, and Jennifer Dill. *Women and Cycling* in Pucher, John and Ralph Buehler. *City Cycling*. Cambridge, MA : The MIT Press, 2012.

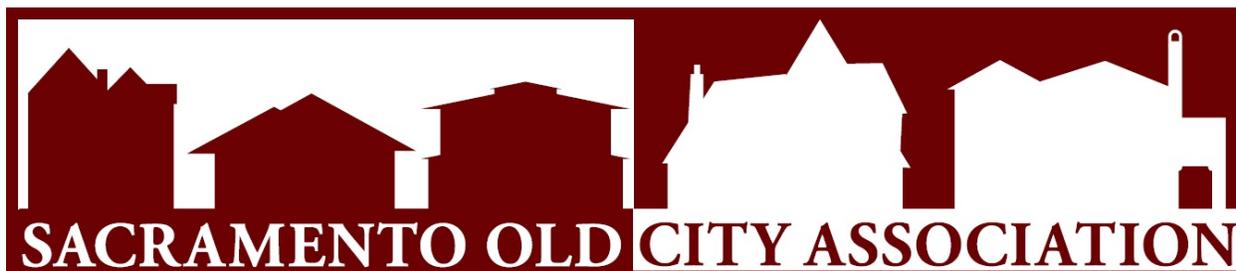
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Goodyear, Sarah. *The Case for Separated Bike Lanes*. The Atlantic Cities website. August 12, 2012, <http://www.theatlanticcities.com/commute/2012/08/case-separated-bike-lanes/3015/>

Mekuria, Maaza, Peter Furth, and Hilary Nixon. *Low-Stress Bicycling and Network Connectivity*. Mineta Transportation Institute, San Jose State University. May 2012. Report 11-19.







Sacramento Old City Association - PO Box 162140, Sacramento CA 95816 – (916)202-4815 – info@sacoldcity.org

April 24, 2013

**TO: Tom Buford, Senior Planner
City of Sacramento Community Development Department
300 Richards Boulevard, Third Floor, Sacramento, CA 95811**

RE: Notice of Preparation of an Environmental Impact Report and Scoping Meeting for the Entertainment and Sports Center—Public Comment on Cultural Resources

On behalf of the Sacramento Old City Association Board of Directors, SOCA wishes to identify the half-block of properties along 8th Street between J and K Street as an area of historic and cultural significance within the boundary of the Entertainment and Sports Center (ESC) project. This half-block is one of the properties under consideration as capital contributions by the City of Sacramento, and identified in the Notice of Preparation as within of the project boundary.

This parcel includes several properties identified in surveys as historically significant cultural resources that must be addressed. One is a listed city landmark, the Bel-Vue Building, identified in a previous development project as a property that must be included in subsequent development of the parcel. The second is the surviving portion of underground sidewalks along 8th Street and K Street, identified by survey as historic resources by the City of Sacramento. The third and fourth are the parking garage at 805 L Street and the restaurant/bar at 815 L Street. Both were identified in previous resource surveys conducted over a decade ago, and merit re-examination under current standards for their eligibility for the Sacramento Register, as well as potential California Register and National Register eligibility. The garage was constructed in approximately 1920 and retains a high degree of historic integrity, including interior walls that may predate the existing structure as they include windows that are now lower than the current street level. The restaurant at 815 L Street was identified as ineligible in a survey conducted in 2000 because the façade was reconstructed in the 1950s, but that façade is now over 50 years old and is thus potentially eligible for its association with Sam's Hof Brau, a well-known local restaurant, as well as its predecessor La Rosa Restaurant. There is still a Sam's Hof Brau sign painted on the eastern wall of the building, and the alley side of the building retains portions of its ground-floor commercial entrance. Commercial buildings often receive new facades during their operating life, and those alterations may now have their own significance within the context of the building. The Feldhusen Building, between these buildings and the Bel-Vue, should be reviewed as part of the CEQA process to determine if it retains eligibility as a historic resource.

Sacramento Old City Association strongly supports efforts to restore, rehabilitate and reuse historic buildings and resources, and it is our organization's expectation that any future project proposed for the site will follow the City of Sacramento's specific instructions to reuse the listed Bel-Vue building, and comply with state law regarding identified and potential historic resources with regards to the underground sidewalks and other buildings on the site. The EIR must consider the effects of the ESC project, including the disposition of city owned property to new private property owners, on these historic resources.

William Burg
President, Sacramento Old City Association



WalkSac

5/13/2013

VIA EMAIL

Tom Buford, Senior Planner
City of Sacramento Community Development Department,
300 Richards Blvd., Third Floor
Sacramento, CA 95811

RE: Notice of Preparation of an Environmental Impact Report for the Entertainment and Sports Center

Dear Mr. Buford:

Thank you for the opportunity to comment on the Notice of Preparation for the Entertainment and Sports Center (ESC) project proposed to be built on the Downtown Plaza property bounded by 3rd Street, J Street, 7th Street and L Street in Sacramento.

Development projects that lead to more walking and active travel are critical to our community's future. Human beings need moderate exercise, such as walking, for about 30 minutes a day in order to prevent the development of chronic disease and overweight. If more people could obtain regular exercise by walking and bicycling to their regular destinations, in lieu of driving, it could yield significant health improvements to the resident population of this area. Reduced driving would also decrease vehicle emissions and the prevalence of asthma, cardiovascular disease, and other air pollution-related conditions. More trips by walking and bicycling could help reduce the current expensive burden on the health care system of providing medical care to more and more people with chronic conditions due to inactivity and poor air quality.

The location for the proposed ESC project will enable many more active transportation-based trips to sporting and entertainment events than the existing Sleep Train Arena in North Natomas. We should expect to see positive health impacts because more people will be able to walk or bike to the ESC, but we should understand at what costs these benefits are obtained.

The Environmental Impact Report should consider the impact to public health and safety - specifically the health and safety of pedestrians - that may be caused by the ESC project. A project such as the ESC should generate a significant number of trips by all modes, yet only vehicle trips are typically considered in EIRs.

More pedestrians and more cars may combine to put pedestrians at risk if crossing locations and opportunities are inadequate or unsafe. The analysis of both pedestrian and vehicular traffic is important to evaluating the pedestrian environment.

We recommend incorporating factors such as:

- vehicle speed and volume
- crossing distance
- number of lanes
- pedestrian crossing time and delay
- distance between crossings
- pedestrian signals
- traffic signals
- parking
- landscaping and trees
- bike lanes
- vehicle turning volumes

A pedestrian level of service or quality of service methodology should be applied to all streets in the area, including

- H Street to N Street
- 3rd Street to 10th Street
- the I Street Bridge
- the Tower Bridge

In addition, we recommend including several factors in the traffic analysis.

- Weekday and Saturday evening hours. Many of the events at the ESC will occur at night and the impacts to traffic may be felt in the early evening hours in addition to the late afternoon.
- Pedestrian collisions. The existing and cumulative safety risk for pedestrians should be evaluated.

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.

Sincerely,

Chris Holm
Project Analyst



MIWOK United Auburn Indian Community
MAIDU of the Auburn Rancheria

Gene Whitehouse
Chairman

John L. Williams
Vice Chairman

Brenda Adams
Treasurer

Calvin Moman
Council Member

May 9, 2013

Tom Buford
City of Sacramento
Community Development Department
300 Richards Blvd., Third Floor
Sacramento, CA 95811

Subject: Entertainment and Sports Center, City of Sacramento

Dear Mr. Buford,

Thank you for requesting information regarding the above referenced project. The United Auburn Indian Community (UAIC) of the Auburn Rancheria is comprised of Miwok and Southern Maidu (Nisenan) people whose tribal lands are within Placer County and ancestral territory spans into El Dorado, Nevada, Sacramento, Sutter, and Yuba counties. The UAIC is concerned about development within its aboriginal territory that has potential to impact the lifeways, cultural sites, and landscapes that may be of sacred or ceremonial significance. We appreciate the opportunity to comment on this and other projects in your jurisdiction.

In order to ascertain whether or not the project could affect cultural resources that may be of importance to the UAIC, we would like to receive copies of any archaeological reports that have been, or will be, completed for the project. We also request copies of future environmental documents for the proposed project so that we have the opportunity to comment on potential impacts and proposed mitigation measures related to cultural resources. The UAIC would also like the opportunity to have our tribal monitors accompany you during the field survey. The information gathered will provide us with a better understanding of the project and cultural resources on site and is invaluable for consultation purposes.

The UAIC's preservation committee has identified cultural resources within your project area and in close proximity, and would like to request a site visit to confirm their locations and meet with you regarding this project. Thank you again for taking these matters into consideration, and for involving the UAIC early in the planning process. We look forward to reviewing the aforementioned documents as requested. Please contact Marcos Guerrero, Cultural Resources Manager, at (530) 883-2364 or email at mguerrero@auburnrancheria.com if you have any questions.

Sincerely,

Gene Whitehouse,
Chairman

CC: Marcos Guerrero, CRM



SHINGLE SPRINGS RANCHERIA

Shingle Springs Band of Miwok Indians,
Shingle Springs Rancheria
(Verona Tract), California
5281 Honpie Road, Placerville, CA 95667

May 30, 2013

City of Sacramento
Community Development Department
300 Richards Blvd, 3RD Floor
Sacramento, CA 95811

Dear Tom Bufford

The Most likely Descendant, Daniel Fonseca would like to initiate consultation process with the City of Sacramento, Community Development Department for the proposed Entertainment And Sports Center Project that is located in Sacramento County. Among other things, we would like this consultation to address the cultural and historic resource issues, pursuant to the regulations implementing Section 106 of the National Historic Preservation Act.

Prior to meeting we would like to request any and all completed record searches and or surveys that were done in or around the project area up to and including environmental, archaeological and cultural reports.

Please let this letter serve as a formal request for the Shingle Springs Band of Miwok Indians to be added as a consulting party in identifying any Traditional Cultural Properties (TCPs) that may exist within the project's Area of Potential Effects (APE).

Please contact Andrew Godsey, Assistant Cultural Resource Director, (530) 391-7091 agodsey@ssband.org or Angela Rivera, Administrative Assistant at (530) 698-1557 anrivera@ssband.org, to schedule a consultation meeting pursuant to Section 106 of the NHPA.

Sincerely,

Daniel Fonseca
Cultural Resources Director
Tribal Historic Preservation Officer (THPO)
Most Likely Descendent (MLD)

ENTERTAINMENT AND SPORTS CENTER

ENVIRONMENTAL IMPACT REPORT (EIR) NOTICE OF PREPARATION (NOP)

COMMENT FORM

Please provide the following information if you wish to receive Notice of Availability of the Draft EIR and to document the author of comments received. Thank you.

Name: James Adams

Email: JJ4W2x2@hotmail.com

Address: 1000 V St, #10

Organization: _____

I would like to receive future environmental notices via email.

Please provide us with your written comments by **May 13, 2013**. Comments on the NOP may be sent to:

City of Sacramento
Community Development Department
300 Richards Blvd, Third Floor
Sacramento, CA 95811

Attn: Tom Buford, Senior Planner (Email: TBuford@cityofsacramento.org)

You may attach additional pages to this form and/or you may submit your written comments separately. Written comments on the scope of the EIR will be acknowledged in the Draft EIR and will be considered in preparation of the document.

Please ensure that visual impacts to existing + future residents + hotel visitors are mitigated related to electronic signs + bill boards. West Hollywood, Ca has dealt with these issues and may be of assistance on measures used.
For site design, please ensure adequate review of messaging and overall visual effects from ground + surrounding ~~buildings~~ buildings.
over →

Parking - please allow for mitigations on parking availability + rates for those not attending ESC events to ensure continued vibrance in surrounding business districts. (Don't come downtown after 6pm if parking is not free/very inexpensive).

Walkability + landscaping - please ensure mature trees are planted to increase shade + visual effect of park-like setting. please break-up large areas w/ paving/art so that when empty, it still is accessible and friendly.

Transit - please ensure co-ordination with Sac RT for light rail + other options to be timed for ESC events to increase public transit utilization.

I don't see in any of the plans to date, including in those for the environmental impact study, a review of how this effort compounds the effects of other city efforts. A master plan needs to be implemented to manage outcomes across projects. For example, the ESC in combination with the Alder Grove/Marina Vista development could have disastrous effects on crime and traffic in this area of downtown.

I am a supporter of the ESC, but it will fail if not supported by the people of Sacramento. The project needs to be managed with a wider lens to ensure a successful outcome for the future of Sacramento. Please consider a master plan to look across projects and to look futuristically, not just in the here and now. Thank you.

Nicole A. Amador
naamador@gmail.com

Wed, Apr 24, 2013 9:37 AM

ENTERTAINMENT AND SPORTS CENTER

ENVIRONMENTAL IMPACT REPORT (EIR) NOTICE OF PREPARATION (NOP)

COMMENT FORM

Please provide the following information if you wish to receive Notice of Availability of the Draft EIR and to document the author of comments received. Thank you.

Name: Mike Barnbaum

Email: Mike_barnbaum@comcast.net

Address: 81 Dean Road #4 Sacramento 95815

Organization: Think BIG Sacramento / Crown Downtown

I would like to receive future environmental notices via email.

Please provide us with your written comments by **May 13, 2013**. Comments on the NOP may be sent to:

City of Sacramento
Community Development Department
300 Richards Blvd, Third Floor
Sacramento, CA 95811

Attn: Tom Buford, Senior Planner (Email: TBuford@cityofsacramento.org)

You may attach additional pages to this form and/or you may submit your written comments separately. Written comments on the scope of the EIR will be acknowledged in the Draft EIR and will be considered in preparation of the document.

Please hold meetings with both Yolo Bus & Regional Transit. We need a significant investment into both more frequent and late(r) night service on existing bus routes that operate on the streets surrounding the JMA Ventures Downtown Plaza. Once hiring/training is going on at the new E.S.C. we will need a financial and transit service plan implemented subject to the approval of the SacRT Board, YCTD Board, and the City Councils of both Sacramento and West Sacramento.

From: Jean Fleury [fleuryj@surewest.net]
Sent: Saturday, May 11, 2013 8:29 PM
To: Tom Buford
Cc: fleuryj@surewest.net
Subject: Sacramento Entertainment and Sports Center CEQA EIR

Dear Mr. Buford:

Here are my questions, concerns and comments regarding the proposed Entertainment and Sports Center (ESC). As we discussed at the Public Scoping Meeting, I told you that I would likely have many. I apologize for the length, but the (ESC) is a serious and important matter; all aspects of it need to be carefully considered. While I don't have all the information which is available to you, these are some of my observations based on what I do know from reading many reports by numerous organizations, including the city and Think Big; countless newspaper, magazine and blog articles; and attending dozens of meetings of the various groups that have been involved in putting together the arena concept over the past three and a half years.

If some of these comments pertain to other issues beyond CEQA, please forward them to the appropriate individuals who may be responsible for any matters that are beyond your scope. Thank you.

1. Air Quality (Also see Transportation)

- A. Air pollution has increased greatly during the 30 years I have lived in area, as the regional population has doubled in size. How is the city going to prevent an additional 33% increase in vehicular pollution when the population increases by nearly another million people (per SACOG) in the next 25 years? Many of those folks will work downtown. In addition, with the placement of an arena in the city core, add thousands more vehicles to rush-hour levels many days a year.
- B. Public transit is imperative to help lessen vehicular pollution. But transit is not available to many arena patrons and they will have to drive, increasing traffic congestion and pollution, particularly as they circle block after block looking for a place to park, and stopping and idling at signals and stop signs.
- C. While public transit will help to alleviate some traffic, thus helping to offset some pollution, it is not always available for events. This last recession eliminated late public transit hours and many routes. RT cannot guarantee dependable and safe late-night service, particularly during economic downturns, which happen every few years.
- D. The ESC location must be easily accessible to the majority of event attendees. 3/4 of them are not from the City of Sacramento (see the Think Big "The Capitol Corridor Impact Report"). Downtown locations will result in more traffic congestion and pollution because light rail and buses will not be handy for the majority of arena patrons, who must drive to get there.

2. Biological Resources

- A. The city should consider constructing a park, or a Japanese or botanical garden---which would be more interesting than just a regular park---on the city land in the Railyards near the future intermodal transit hub. The city should limit the number of permanent structures on that land so that there is plenty of room to handle all those future modes of transit on the site.
 - 1) A garden could be designed in such a manner that it could be enjoyed now and still leave room for expansion of the transit hub in the future with little demolition required.
 - 2) A hotel would be appropriate on the site, but additional permanent structures should not be contemplated until the intermodal hub is built out and it is known how much land it will require.
 - 3) The garden would encourage more people to ride transit as there would be a peaceful, beautiful area to relax and wait for it. It would benefit the future residents of the various downtown residential units, and downtown workers, travelers and tourists.
 - 4) It may be a better solution because of potential residual contaminants on the site.

3. Cultural Resources

- A. There are many cultural attractions downtown already. Having more assets in one area does not always translate into more economic activity, as many people will not want to deal with the traffic, crowds and parking problems due to conflicting attractions. They may choose to come to the city core's other activities less often or not at all.

- B. The Crocker may lose some of its parking as a result of the city's plans to give away the parking near it to help finance the arena. That lot also serves as a source of income for the museum. This would be tragic and the city should reconsider the giving of this parking area to the arena investors.
- C. The Community Center Theater may lose a funding source for its necessary renovations. This is unacceptable to many theater attendees who have been waiting for years for this makeover. This could also result in costly lawsuits.
- D. Arena events may affect Old Sacramento's businesses due to fewer visitors there because of the crowds, traffic and loss of parking spaces to ESC attendees, and increase in parking fees due to the arena. While the arena may increase some visitors to Old Sac, others will stay away.
- E. There will also be additional museums in the future in the city core or nearby: Powerhouse Science Center, California Indian Heritage Center (CIHC) (across the river in West Sacramento) and the expanded California Railroad Museum. All these museums will add to downtown traffic. While most are closed at night, not all arena events are in the evening. Many are held on the weekends, when museums and other attractions are open and need the parking spaces, and when many folks may want to do some shopping.

4. Geology and Soils

- A. If the city will not consider an ESC location other than one that is downtown, such as in Natomas, a better site for the arena would be in the Railyards, north of the tracks and the future railroad museum buildings. This may be a better alternative than residential units in some Railyards areas due to the toxic problems that may remain in the soil and groundwater there. I understand that much of that has been, or is being, cleaned up, but there may still be some lingering problems that would be better solved by putting structures there that will not have permanent occupants, such as an arena or shopping mall. Either of these structures may be a better solution on potentially hazardous soils.
- B. According to county flood maps, it appears that the existing mall site, which could possibly be the future home of the arena, may be located in an area that could potentially flood in case of a severe storm or levee breach. If so, how will that be handled? Will that portion of the site have to be elevated to accommodate potential flooding? Has that been figured into the cost of this project?
- C. Does the site also have a high water table that will require sophisticated water management systems to keep water intrusion out of the recessed portions of the arena and underground parking garage area most or at all times?
- D. In case of a flood in the area, even if the arena itself is not flooded, the surrounding vicinity could be and prevent access to the ESC for events, according to the county's flood plain maps.

5. Greenhouse Gas Emissions and Climate Change (Also see Air Quality and Transportation)

Since greenhouse gas and climate change are real possibilities all over the world, limiting conditions that would contribute to them is a necessity, such a driving on congested city streets.

6. Hazards and Hazardous Materials

Will the toxic issues on the Railyards site have any effect on the Downtown Plaza site via migration of toxins in the ground water? If so, how would that be addressed?

7. Land Use and Planning

- A. The city should not consider an arena on the city land next to the Amtrak station and the future intermodal transit hub as was previously suggested last year. That land is needed for the future millions of annual transit passengers that are forecast to come through that hub.
- B. With the Amtrak trains, light rail, proposed street cars, Greyhound buses, RT buses, shuttles, taxis, bicycle riders, and passenger vehicles dropping off and picking up passengers---some needing to park---and possibly high-speed rail trains, there is no room on the city's Railyards site to construct an arena.
- C. Sacramento Convention Center activities need consideration too. While there may be a few events that would use both the arena and the convention center as a package deal, those would be few and far between. There are many more that will only need the convention center and it could be a victim of the arenas traffic, crowds and parking issues.

- D. Although the mall site is better for an arena than the city land next to the transit hub, it is still not the right site for the ESC. The arena should stay in Natomas, which I think is preferable from a traffic and ease of access standpoint for the majority of the arena patrons. As stated elsewhere, the majority of ESC attendees (3/4) are not from the City of Sacramento. I have already had many friends tell me that they will likely attend fewer arena events if they have to go downtown to them. They like the ease of getting to Natomas.
- E. The Natomas location also has plenty of parking and land beside it where another sports facility could be built in the future, which could share the parking and other amenities there.
- F. Moreover, the existing arena site in Natomas has plenty of parking that could be used to help pay for the ESC instead of having to use downtown parking fees to build it in the city core.
 - 1) The downtown parking funds could then be available for other useful projects: getting infrastructure completed in the Railyards so that development can proceed there; continuing with expansion of the transit hub; proceeding with development along the riverfront. These three projects will help bring more central city dwellers, workers, visitors, and tourists, 24/7/365.
 - 2) An arena is only used a few hours a week.
 - 3) This also eliminates the need to replace the economic loss in Natomas if the arena moves.
- G. One development activity that the city should be focusing on is getting the riverfront developed. That will encourage more people downtown 24/7/365 days per year and have many more active hours than an arena. The riverfront could have residential and retail units, entertainment venues and recreation attractions, such as expanded water activities.
- H. The city will make a huge mistake in getting rid of the Natomas land. If the city wants another type of sports team in the future, such as soccer, football, or baseball, it will need that land and the existing parking on it.
- I. However, since the city is so intent on putting the ESC in the central city, because certain people believe that it will benefit the city more economically if it is there---even though the majority of economic analyses of sports complexes state that they are not the economic engines they are claimed to be---the downtown plaza site has its minuses. It takes away a mall that will be necessary to service the thousands of future downtown residents and workers. If the arena is built there, the city should get a written commitment from the investors to build another large mall in the Railyards project, closer to the many thousands of residents who will eventually reside there and in Township 9.
- J. Or the arena should be in the Railyards project north of the tracks and future museum buildings, nearer to Richards Boulevard for easier access to I-5 and 160. The arena in the Railyards is a better solution as the existing mall is close to thousands of downtown workers who use it regularly. (I know. It desperately needs renovation. Hopefully the new owners will see the benefit in remodeling it for the future.)
- K. According to city leaders and central city business interests, the purpose of putting the arena downtown is to stimulate business activity there, accelerate development in the Railyards project, and to encourage more spending in the city core. However, replacing the mall with an arena is not the best use of that land. The future thousands of residents and workers are going to need a large, covered mall that is easily accessible, with plenty of free parking. Putting the arena there eliminates much of the mall and most shopping parking. The crowds and traffic during ESC events will discourage shopping by most people who will need to drive there. In order to shop, people need access to close-by parking so that they are not carrying their purchases over several blocks to get to their cars. It is not always safe to do so either. And most people who ride light rail will not want to carry packages on it. If they have other transportation, they will likely drive to a mall to shop. There needs to be plenty of up-close-and-personal parking at it.
- L. Renovation of the existing mall, if done right, can do the very things that this particular arena project is supposed to do: bring more residents, new businesses, and consumers to the city core. If it includes the right mix of popular and specialty stores, the right mix of office and residential spaces, it can be a boom to downtown without the added traffic and crowds of an arena, which will not really be providing that much commerce. The “Economic Engine Report” published by Think Big only shows \$5 of “other retail” spending per arena attendee. That is not enough to have most businesses stay open during arena events, as shopping by attendees will be miniscule.

8. Light and Glare

The “light and glare” that I’m most concerned about is the distraction from the digital billboards that will be situated around the site and the city. There are enough diversions already that create driving hazards without having billboards with constantly changing messages that distract drivers from keeping their eyes on the road. This is a real public safety issue.

9. Noise

Noise from the arena could affect other businesses and residential units in the surrounding area. The arena will likely attract arena-centric businesses, like bars and night clubs, and other activities that, along with the crowds and traffic, may be a dissuading factor to get people to live nearby.

10. Parking: On-street and parking structures

- A. How will the city handle the parking increases in the residential neighborhoods nearby, such as Alkali and Mansion Flats that will likely have many arena attendees trying to park in those neighborhoods? Alkali Flats already is inundated during the day with city, state, county and other nearby business employees parking there to avoid paying for parking. Every two hours they scamper out and move their cars to another spot a few spaces or blocks away to avoid a parking ticket. I know people who do that. This leaves few spaces for residents. With an arena nearby, this will be a problem at night as well, even if the spaces are metered.
- B. How will the city handle the traffic as arena attendees circle block after block looking for a place to park, particularly spaces that do not have meters on them in residential areas.
- C. If “smart” meters are installed, they could be “fed” without drivers returning to their cars and create even fewer parking spaces for residents and nearby businesses because drivers will stay for longer periods of time.
- D. There has been talk of having phone apps that tell you which spaces are open. But what happens when several drivers rush to get to the spot and end up fighting over the space? Or they get there and it is already taken so they have to continue to drive around. They may end up actually wasting more time and gas going after that spot.
- E. How will traffic be directed into and out of the underground arena parking so that it will not create traffic jams and accidents?
- F. Will some nearby streets have to be closed off to other traffic during arena events in order to allow arena traffic to enter or exit the parking garages? If so, that may cause longer driving times to get to where one wants to go.
- G. How will the parking for the rest of the mall be separated from the arena parking so that mall parking for shoppers is not taken over by arena attendees? If there is not close-by parking for shoppers, they will stop going to the mall, thus hurting businesses there. In addition, shoppers will not want to walk several blocks in weather extremes with their purchases.
- H. How well will the underground arena parking garages handle all the fumes from thousands of idling cars that will be leaving after events? Normally, the mall parking is not fully utilized every day and when it is, the shoppers are usually coming and going all day. Most of the arena patrons will all be trying to leave or enter at the same time, thus causing severe exhaust emissions accumulation, particularly as they stop when leaving to pay for parking.
- I. Will there be parking directly under the arena? If so, how will it be protected from terrorist attacks? The NBA has said in the past that it doesn’t like parking under arenas. If cars have to be searched, it will be a nightmare.
- J. Any residential units built downtown will need adequate parking as part of the units. Otherwise, residents parking on city streets will take spaces needed for businesses’ customers. It will also discourage many folks from buying or renting there as this is California, after all, and cars are a part of us. As much as many people would like to get us out of cars, it isn’t going to happen overnight. In order to have the city core a desirable place to reside, work and play, there needs to be plenty of parking, at reasonable rates.
- K. The city must be careful about raising parking fees. That will discourage many people from coming to the city core to attend arena events, other attractions or events, shopping or conducting other business.

11. Population and Housing

- A. Since there is estimated to be 30,000-40,000 future residents in the Railyards and Township 9 projects alone, with many other residential projects that will eventually be built in the city core, there needs to be easy access from those residential areas to shopping. The location of the existing mall is handy for the thousands of downtown workers. It will be just a short drive, walk or light rail ride for thousands of residents in the area. While I understand that the Railyards and Township 9 projects will have retail spaces mixed with the residential units, there will still be the need for a large, covered mall where one can go and do the majority of ones shopping without having to get in a car and drive, or ride light rail, to assorted strip-malls. And light rail may not go to many areas where one needs to do business. That is why the current location of the mall is the best one. It is on the light rail line and near many central city businesses. But combining it with an arena will discourage many shoppers due to lack of parking directly next to it, or under it, which is exclusively for mall use, and the crowds around the arena. Many of those potential shoppers may end up driving to other large, covered regional malls for free, and easier, parking and the advantage of being shielded from the extreme heat or cold rain. A covered mall with a variety of stores, such as Macys, Sears, Penney's, and other popular retailers, at a variety of income levels, will be a lot more convenient for most people for one-stop shopping. The plan to eliminate the majority of the existing mall for an arena does not make sense from a planning standpoint.
- B. There must be housing units priced for all levels of income near the arena. Many of the arena workers, and those of the future surrounding arena-centric businesses, will be making low wages. They will need nearby housing so that they will not have to travel great distances to their employment, particularly since most of their work hours will be at night. Transportation at night may also be difficult for them as they may have to take public transit to get to work. Late-night public transit is often eliminated during economic downturns.

12. Public Services

- A. With more people attending ESC events, often times as many as 18,000+, there will be a greater need for police service to control crowds, direct traffic and prevent or solve crime in the central city. There will also need to be fire and ambulance service. Since the city is hoping for more people to come early and stay late, there may be a longer time-frame for these services than is currently required at Sleep Train Arena. And if there are more nights of entertainment, due to a new arena drawing more people, at least initially, there will be a greater need for police, fire and EMT's. What will be the availability of such personnel even if paid for by the Kings? Will that leave enough personnel for other parts of the city?
- B. There will need to be increased security at parking garages, particularly the ones near the arena? How much will that cost? Who will pay for it?
- C. Have emergency evacuation routes been identified that can funnel out the thousands of arena attendees and the increased number of residents estimated for the future central city, or for other parts of the city for that matter? Will the arena have emergency supplies in case it is needed as an area of refuge during a disaster? Emergencies situations include floods, earthquakes, fires, riots, terrorist attacks, chemical weapons attacks, etc.
- D. Will the new ESC complex impact city waste management by increasing trash in the area? How much will that add to the city's costs? How will it be determined if the trash is a result of the arena crowds or the consumers at other downtown businesses?

13. Recreation

- A. Too many recreational activities in a condensed area can actually discourage many people from going to that locale. Too many "assets" may actually become "liabilities." While the ESC may draw many people who don't live in the city, traffic, crowds, pollution, crime and high parking fees may keep many others away. Consequently, location of these assets must be carefully considered. The city already has, and is planning on adding, other entertainment and educational attractions in the future (see Cultural Resources above). Those must be carefully planned so that they complement each other and don't discourage

patronage to other venues by causing too much traffic, crowds, and parking problems in a concentrated area.

- B. While the ESC will be considered an entertainment facility, there will still be a need in the downtown district for other leisure amenities. As I stated earlier, a park near the intermodal transit hub would be a welcome relief for visitors, travelers, workers and residents in the city core area. And it would be readily accessible by public transit.
- C. While there are many wonderful museums and other activities downtown, most cost money to attend. There needs to be a new large park or two in the future that have free facilities such as basketball courts, tennis courts, a swimming pool, etc., for the thousands of upcoming residents. There needs to be resources for all income levels as many of the arena-centric businesses in the central city will employ minimum wage workers. There must be entertainment opportunities for those families as well as those who can afford to go to arena events and other pricier downtown entertainment venues.

14. Transportation/Traffic and Parking

- A. Since the preponderance of the arena patrons (3/4) do not live in the city of Sacramento (see the Think Big “The Capitol Corridor Impact Report”), the Downtown Plaza location means that many of them will have to drive to the site as they likely are not near light rail or bus routes. Consequently, traffic into and out of the arena area will be heavy before and after events. Many people say that the bulk of the downtown worker traffic will have left the area by event time. That may be the case under ordinary circumstance; however, the reason that the city wants the arena downtown is to capture as many of the arena patrons’ limited disposable entertainment dollars as possible. Otherwise, why not leave the arena in Natomas? The city will likely do everything in its power to get patrons there early.
 - 1) That means that the city will try to get those attendees to come earlier in order to eat, shop and do other business downtown, thus encroaching on snail-crawl traffic hours. But:
 - a) The Think Big “Economic Engine Report” only lists \$5 per arena attendee for “other retail” spending. That is not enough money to off-set the environmental costs of more traffic congestion. And that is not enough money for stores to stay open late to capture those dollars after events.
 - b) Most ESC attendees will be coming from work or school, maybe after a brief stop to pick up family or friends, but won’t have time for shopping and barely have time for eating. Only a few restaurants and nightclubs will benefit.
 - c) Even those may not benefit a great deal as many folks will grab a bite to eat inside the arena.
 - d) Those who try surrounding restaurants may have to wait in line in order to be served, thus missing part of events. Consequently, many folks will not be coming for dinner; they will eat nearer their homes or businesses.
 - e) This defeats the purpose of having the arena downtown, as the city is not capturing significantly more income than it gets from the Natomas location.
 - 2) For those who do come to the city early to eat, shop, etc., they will be caught in rush-hour traffic. Rush-hour traffic means more stopping, idling, going around block after block looking for parking. In other words, this location will greatly increase traffic congestion and pollution. One of two things will happen:
 - a) People who come early to eat and shop will mix with rush-hour traffic congestion;
 - b) Or they will not come early to avoid that scenario and the city will not be getting the economic benefit it is planning on. This also has two consequences:
 - i. The city will have to make up the lost income by taking taxpayers money to fund the arena shortages;
 - ii. It will have made a huge mistake in putting the arena in the city core, thus creating an economic black hole in Natomas that may take years to replace.
- B. There is a conundrum here. If the city encourages public transit ridership to arena events, there will be less parking downtown, consequently less money to pay for the arena. However, if it doesn’t encourage transit ridership, there will be more traffic and pollution. The more traffic, the fewer people who will go to the city core because of it.

- C. Since the region is expected to grow by nearly 1 million new residents in the next 25 years (per SACOG), many of those folks will work downtown and many will likely drive. That will put thousands of additional vehicles on city streets.
- D. If the majority of the existing mall is replaced with an arena, unless a new mall is built somewhere downtown---preferably in the Railyards project, north of the Amtrak tracks---thousands of downtown residents will likely drive to other regional malls, thus taking business from the city core and creating more traffic congestion.
- E. There will be more vehicles driving through downtown streets, causing longer and slower drive times in order to get to nearby freeways, as the I-5 on-ramp at I Street will be overwhelmed with vehicles trying to get on the freeway. Other drivers will be going south to get to Highway 50; others will be going east to get to Highway 160 and Business 80, all through business districts or residential areas with signals, and stop signs, stopping and starting. This will increase downtown pollution.
- F. There has been talk by some city officials of removing the I-Street on-ramp for greater connectivity to Old Sacramento and the river. That will increase traffic on other city streets leading to freeways.
- G. The future traffic from 30,000-40,000 Railyards and Township 9 residents, other future city core residents, and the many new businesses that will also be established there, must be considered in the traffic mix.
- H. The traffic going to/from Raley Field events must also be taken into account.
- I. This is why the arena should remain in Natomas. If the city won't reconsider that, it should be built in the Railyards, closer to the Richards Boulevard I-5 on/off ramps and easier access east on Richards to 160, thus bypassing much of the downtown businesses and residential communities such as Alkali and Mansion Flats. In addition, it would be closer to the proposed location of a new bridge to West Sacramento.
- J. How is the city going to handle the additional traffic on residential streets where the "traffic calming" modifications were implemented a few years ago with the traffic rounds and the abrupt street endings, forcing people to divert to other nearby streets? Many people who go to arena events are not familiar with the downtown streets and will end up going around in circles and into residential neighborhoods trying to get into and out of the city core. Those "traffic calming" solutions may come back to haunt the city with more traffic and frustrated drivers wandering around.
- K. Light rail, streetcars, buses, and bicycles may further slow other vehicular traffic. While public transit does get some people out of their cars, it also delays the remaining vehicles that have to go slower because of it, thus causing additional bottlenecks and pollution. Consequently, added arena traffic will add to this problem.
- L. In order to get more people onto light rail and buses, RT needs to be able to provide reliable service for ESC events, for downtown workers and for residents. RT has had a difficult time the last few years during this past recession providing service and security to passengers. This is something that comes and goes with the economic cycles and will happen again in the future. The city cannot depend on public transit to solve the traffic problems downtown. Consequently, many people will have to drive and park for ESC events.
- M. As a long-time transit rider, I can tell you that many folks will not ride public transit at night. I have had many bad experiences, even during the day, with people who are drunk, on drugs, mentally ill, homeless asking for money, seeing people attacked, prostitutes, and drug dealing. I, and several people I rode light rail with, have had our cars broken into at RT parking lots. Security must be increased on public transit in order for people to feel safe and ride it. Who will pay for that? Guaranteeing that transit will be reliable and safe is not doubtful.
- N. The city should be focusing on getting light rail extended to the airport in order to have a true intermodal transit hub that connects all our local public transit. Having light rail extend to the airport would also get many cars off I-5 as people from surrounding communities and counties, such as Natomas, Yuba City, Woodland, and points north could park outside the central city and ride light rail into town.
- O. The additional arena traffic on I-5 at rush hour will not only make it congested for local drivers, it also slows interstate traffic. The freeway serves more than just Sacramento regional drivers. Some of that

interstate traffic may find alternate routes, due to the additional traffic, and not even stop in Sacramento. The city wants more visitors, not less.

- P. The boat section of I-5 near the J-Street off-ramp is notorious for flooding. Although new pumps were installed in recent years, severe storms could still trigger water problems in that area, thus causing traffic delays or stoppage. How will that be handled? How will traffic be detoured to the arena?
- Q. The construction of the arena and surrounding area will take years. During that time, many businesses will be disrupted or displaced. Businesses for blocks around the construction area will be affected by the construction traffic and noise, even if they are not directly involved in the projects. All traffic on streets in the immediate area will be affected. That is another reason why the better ESC site is Natomas or the Railyards.
- R. There must be areas reserved for various types of transportation, such as bicycles and motorcycles. Even Segways may be more ubiquitous in the future. Some people may even rollerblade or ride skateboards to the arena. This type of transport will need storage lockers in the parking areas.
- S. There needs to be a free shuttle service from the farthest parking garages for the disabled, elderly, children, etc.
- T. There needs to be an agreement with RT that it will honor arena tickets for a free ride within a certain zone downtown and reduced rates on longer rides to encourage transit ridership.

15. Utilities

- A. Can the city's sewer, water and electrical systems handle all the new development proposed for that ESC site plus the other residential and retail projects anticipated immediately around it, and other downtown development, such as in the Railyards and Township 9 projects? The Railyards and Township 9 projects alone will eventually have 30,000-40,000 residents, plus many supporting businesses.
- B. If the utilities systems are not adequate for this project and the proposed surrounding development, how much will it cost to upgrade those systems, who will pay for it, and when can it be accomplished?
- C. Can the sewer and waters systems handle all those ESC half-time flushes, which will be a heavy at intermission of arena events?
- D. Is the city planning to replace the existing combined sewer and storm drain system soon? I worked downtown for many years and the stench from that system during hot summer days was disgusting. Sometimes it backed up into the streets and nearby buildings during storms. This is not a healthy situation and certainly would discourage some potential businesses and residents---if they know about it---from locating in the central city.
- E. The current arena site in Natomas already has the necessary infrastructure to the site (sewer, water, electrical, etc.), easy access to freeways, plenty of parking, and proper zoning.

OTHER ISSUES:

1. Economics (Also see Transportation and Land Use):

- A. It needs to be noted that the 3 million visitors that are touted for the downtown are mostly redistributed arena patrons from Natomas to the city core. These are not all "new" visitors to the area, just relocated ones. If the new arena were built in Natomas, there likely would be as many visitors there. A new arena will draw more visitors in the first year or two because of curiosity about it. If the team does not drastically improve, those visitors will dwindle, whether the arena is downtown or in Natomas. That is what has happened over the last few years since the team has deteriorated.
- B. This proposal for a new arena at the site of the Downtown Plaza mall, with the city paying for 2/3 of the new arena, has the potential to put the city in economic harm by using its existing parking funds---and other city assets---to pay for the ESC. If the arena, and the surrounding development that is proposed, does not provide the amount of income from parking and tax revenues necessary to pay for the arena financing, the city will have to make up the bond payments in other ways. The better plan would be to build the arena on the city land in Natomas and utilize the parking fees from the lots there to help finance the new arena. This would free up the downtown parking funds to be used for other worthwhile projects that will have a better return on investment (ROI) than a city core arena. The arena will be used only for a few hours per week. The city needs 24/7/365 days per year (or close to it) activity there.

- C. That 24/7/365 activity will happen when the thousands of future downtown residents move into downtown residential developments. In order to make that possible, the city should fund the needed infrastructure in the Railyards to get that project advanced. When people start moving in there, the supporting businesses that they need will follow. Those businesses will pay property and other taxes, thus adding to the city's coffers.
- D. Renovating the existing mall, instead of replacing it with an arena, will help further the redevelopment of the K Street mall as well.
- E. Removing the arena from Natomas creates an economic black hole there that may take years to fill. Until that happens, it will just be replacing a blight area (downtown) with another in Natomas.
- F. Economic downturns come every few years. All this development must be carefully planned in order to make sure that too much economic benefit isn't planned too quickly, or too slowly, that may not materialize and leave the city worse off with half-completed projects, or ones that will not come to fruition because the others they are dependent on do not occur. Or the area is over-built and the development cannot be rented or sold.
- G. A well-planned renovation of the existing mall site---without an arena---into multi-story mixed use retail, with popular stores---covering a wide range of income levels---office, and residential space will be just as effective for economic benefit, if not more so, than a combination arena/mall complex. The resulting traffic, crowds, lack of on-site parking for shoppers, higher parking rates and safety issues caused by an arena may result in a mediocre or deficit economic return for the mall and the city.
- H. Some of the reasons that the economic development around the present ESC in Natomas has not been as successful as it might have been:
 - 1) Two building moratoriums due to flooding concerns in the last 25 years, one that is on-going;
 - 2) A couple of economic downturns that have stifled business growth everywhere and is on-going;
 - 3) The constant threat from the Maloofs that they were going to move the team from Natomas. Under the threats that the team might move, why would any astute business person build an arena-centric business in Natomas?
- I. District 1, of which Natomas is a part, was the fastest growing district in the last 10 years, growing much faster than other city districts. Once the moratorium is lifted, it could be fast-growing again.
- J. Perhaps the city could use some of the downtown parking money toward getting the levees fixed so that Natomas can grow again and existing properties are protected.
- K. The new proposed arena is taking the place of a much needed mall. As the thousands of future residents move into the Railyards and Township 9 projects, they will need a large center for shopping. In order to make these two---and other city core residential projects---palatable to potential inhabitants, shopping must be convenient. So if the arena is built at the existing mall site, a new large mall should be built in the Railyards, north of the Amtrak tracks (not on the city's transit land). It must have a roof in order to handle the extreme weather conditions we have here in Sacramento.
- L. But the best place for the mall is the existing site because of its proximity to the many city core workers at the state, county, federal and city government buildings, and the many nearby businesses. And it must have plenty of free on-site parking for shoppers, as other regional malls have, in order to encourage spending there.
- M. The city is planning on using parking revenue and other city assets in order to pay for its share of the arena. There is no guarantee that the investors will produce the other development around it they envision. If it takes years to develop, there could be another recession that will squelch it and it may not happen at all, like other planned projects in the past have disappeared before ever appearing (remember John Saca's twin towers?). If they are built too quickly, they may be development that cannot be filled with tenants.
- N. Because the city will have a majority investment in the ESC, it must protect this asset. In order to do that the city may have to give large subsidies to its investment partners, and other developers, to keep them expanding and refurbishing the surrounding area. This could mean that the city ends up losing money instead of making money if the subsidies are not more than off-set by income.
- O. The construction of the arena and surrounding area will take years. During that time, many businesses will be disrupted or displaced.

- 1) All traffic on streets in the immediate area will be affected hurting nearby businesses economically. That is another reason why the better ESC site is Natomas.
- 2) Some businesses may be forced to move in order to stay viable. Who will pay for their move or the cost of breaking a lease?
- 3) Construction traffic and noise will hurt nearby businesses.

2. Existing Arena and Surrounding Land:

- A. If the NBA allows the Kings to relocate to Seattle (which does seem unlikely at this point, but still possible), be purchased by Hansen/Ballmer, and they pay off the existing arena loan:
 - 1) There is obviously money to be made by continuing the operation of the existing arena by continuing to host many types of events there.
 - 2) If they do continue to operate it, will they have a non-compete clause that will prevent the city from constructing another arena in the region?
 - 3) Why would the city continue the fight to build a new arena with so many other pressing issues on its table and the public's entertainment needs are being met at the existing arena?
 - 4) If the existing arena continues to be operated, the city should drop its quest for a new ESC, as there are not enough attendees to support two large entertainment complexes; the city should focus on other downtown development instead as I have suggested. I'm sure many others have some good ideas too.
- B. If the NBA allows the team to stay in Sacramento and the team is sold to the Sacramento investors, construct the new arena in Natomas to save its economic base. The existing arena site is only a 10-minute drive from city center. But it is the most convenient spot for the ESC as the majority of arena patrons are not from the City of Sacramento but from the communities north, east and west of downtown, which have better access to the arena site via I-80 east and west and I-5 and highway 99 from the north. Most arena attendees do not have direct access to public transit and will be driving.
- C. Natomas may be under a building moratorium at this time due to possible flooding concerns, but eventually it will be lifted. In any event, the new arena could be designed now to be above the flood plain. A good architectural and engineering firm can figure out how to do that. Actually, it should be designed that way in order to be a place of refuge for Natomas citizens in case of a flood. Even with levee repair, there is always the possibility that there could be an extreme storm that might flood the area. Citizens will need a place to congregate as they did at the arena in New Orleans during Hurricane Katrina.
- D. The city should also focus on getting the light rail extended to the airport so that the transit hub serves as a true intermodal hub by connecting to the airport and the existing arena site. Light rail would also serve Natomas and surrounding communities, as many of their residents now have to drive downtown for work.
- E. North Natomas has been identified as "urban center high" in the City's 2030 General Plan. Keeping the arena there, will save existing businesses and prevent many of those folks from having to drive downtown for employment, adding even more downtown traffic.
- F. The current arena site in Natomas already has the necessary infrastructure to the site (sewer, water, electrical, etc.), easy access to freeways, plenty of parking, and proper zoning.
- G. If the city gives away the Natomas land, there will not be vacant available city-owned land close to the city center on which to build other sports venues in the future as the city grows and can accommodate other sports franchises. Downtown is only a 10-minute drive from Natomas and eventually a 10 or 15-minute light rail ride.
- H. Since most arenas only have a life expectancy of roughly 20-25 years before they need major renovation or replacement, where will a new one be located at that time?
 - 1) Keeping the Natomas land and building the arena there gives the city space for replacement of the arena when it finishes its life cycle.
 - 2) It also provides a location for another type of sports (soccer, football or baseball) complex beside it that can share parking and other amenities.
 - 3) Buying raw land to build a new arena on in 20-25 years will likely put the facility several miles from the city core.

- 4) Buying downtown land for a new arena or another sports team in the future will cost much more as city core land prices will be higher, and demolition costs will have to be added to the project costs.
- 5) There is no room at the Downtown Plaza site for another sports venue.

3. Location Alternatives: “THE EIR WILL IDENTIFY AND EVALUATE ALTERNATIVES TO THE PROPOSED PROJECT.”

- A. The location for the ESC is important to its success. While the city and many downtown businesses proclaim that the city core is the best location for economic reasons, the vast number of studies on sports facilities state that they do not produce the economic benefits decreed and often result in economic harm to the public entities financing them. Sports complexes just redistribute limited discretionary entertainment dollars from other entertainment activities. Actually, much of that money leaves the area with the entertainers who perform there. Many of the team’s players do not live full-time in the area, so they take large sums of their salaries out of the region also. Since this arena will be financed 2/3 by the city, with some minimal help from the county, it may end up losing money if the profits are not enough to pay for it. If ticket prices get too high, attendance will slump.
- B. The Downtown Plaza mall site is the wrong location for the arena, as is the city land in the Railyards next to the transit hub. If the city insists that the ESC be in the city core and refuses to evaluate the Natomas site, a better place for it may be on Railyards land north of the tracks and closer to Richards Boulevard for better access from Richards to I-5 on/off ramps and highway 160. There is light rail close by and a future bridge to West Sac.
- C. The supposed purpose of placing the ESC downtown, per marketing put out by the city for years, is to bring more activity to the city core to eliminate some of the blight areas there and to stimulate development in the 250+/- acre Railyards project. However, this really doesn’t make sense as an arena only has a few hours of operation per week. The businesses that will likely do well around it are arena-centric businesses like bars, nightclubs, restaurants and sports-related stores. These likewise will have limited hours of robust use and most of the workers in these types of businesses make low wages. Consequently, the purpose for making this drastic locale change from Natomas to the central city doesn’t seem logical. Yet, that relocation can cause great harm to Natomas because there are already many of these types of businesses that have established around the existing arena that will either go out of business or will have to move their locations.
- D. The downtown area will develop most successfully when the many future residents in the Railyards and Township 9 projects start moving in. Gradual growth is better than quickly throwing up lots of development around the proposed new location of the arena, at the Downtown Plaza site, as the types of development that grow naturally will be what is really needed by those future residents. Suddenly building a bunch of new structures, when there is plenty of empty real estate space already---to do development for the sake of doing development---that may sit idle because it is not the type of development that is really needed, will create more economic havoc than it will solve.
- E. Location, location, location is the mantra in the real estate and development fields. This should be the mantra in the sports fields as well. This location, and any location downtown in Sacramento, is wrong for this project. Why? Because the majority (3/4) of the attendees are not from the City of Sacramento, but are coming into the area from other cities and counties, mostly to the north, west and east of Sacramento. Only about 10% of those folks come from cities to the south, such as Stockton, Modesto, Tracy, etc., as they closer to the Bay Area and likely travel there for their sports fixes.
- F. Consequently, the existing site in Natomas is the best location as it is easier for the majority of people to access than a city core site. The Natomas site also has easy freeway access, major streets to funnel the traffic to the freeways, plenty of parking, already handles the thousands of half-time flushes (sewer and water), has the right zoning, and has land next to it that could be used for additional sports facilities in the future that also could share the parking and other amenities.

4. Infrastructure and Other Needed Development

- A. The city should focus on other necessary infrastructure in the city core, particularly the Railyards project, in order to get development started there. It will be the thousands of future downtown residents, and the businesses that will form to support them, that will give the central city the vibrancy that the city has long desired. The city has been pursuing an arena to stimulate development in the city core and Railyards project when it should have been focusing on the infrastructure in the Railyards to encourage residential development there. The businesses that follow will be ones that are needed and will have a better chance of long-term survival.
- B. The city should also focus on the intermodal transit hub enlargement in order to get more folks out of their cars and onto public transit, particularly downtown workers.
- C. The city should focus on getting the riverfront developed similar to Portland and San Antonio. Our rivers are wonderful assets that will encourage more visitors to the central city. And they will have many more hours of activity, if planned carefully, than an arena.
- D. Perhaps the city's investment partners will take a second look at John Saca's twin towers project. These would be impressive additions to the city skyline in a location visible to most of downtown and those passing through on I-5. They would add needed residents to help create a vibrant city core. There needs to be housing for all income levels and this project would satisfy the upper end.
- E. The city doesn't need a central city arena. It needs residents with the supporting businesses that will arise around them, including entertainment venues. Let the new arena stay be in Natomas.

Yours truly,
Jean Fleury
fleuryj@surewest.net

May 12, 2013

Mr. Tom Buford, Senior Planner
City of Sacramento Community Development Department
300 Richards Boulevard, Third Floor
Sacramento, California 95811

Dear Mr. Buford,

This letter is in response to the Notice of Preparation of an Environmental Impact Report (EIR) for the proposed Entertainment and Sports Center (ESC) project dated April 12, 2013. I have the following questions and comments on the scope and content of the information to be included in the EIR.

Questions:

1. Who is the applicant?
2. Will the City staff prepare the EIR or contract its preparation to a private environmental firm?

Comments:

1. In the EIR, please discuss the economic effects of the ESC project on local property values, local taxes and tax base, and City short-term and long-term debt.
2. In the EIR, please discuss the visual effects of the ESC project on the local viewshed, especially in relation to the historic Capitol building.
3. In the EIR, please discuss the issue of personal security for audience members, as well as the surrounding residents and business, before, during, and after events at the ESC.

Please add me to your mailing list to receive further notices and documents relating to this project. I have included both my mailing and email addresses below. Thank you for the opportunity to comment on this proposed project.

Sincerely,

Lynne Stevenson
2316 Capitol Avenue, Apt. 7
Sacramento, California 95816
Lstevenson249@gmail.com

From: Tom Buford
Sent: Tuesday, April 16, 2013 12:25 PM
To: Scott Johnson
Subject: Fwd: ER report on Sports Center!

FYI

Tom Buford, Senior Planner
Office (916) 808-7931
Cell (916) 541-5396

Begin forwarded message:

From: Lana Trovao <lane@imf-inc.com>
Date: April 16, 2013, 11:15:14 AM PDT
To: <tbuford@cityofsacramento.org>
Subject: ER report on Sports Center!
Reply-To: <lane@imf-inc.com>

Hi Tom...I'm **George Trovao** speaking along with my spouse **Lana** for our **Trovao Family Trust**: We have lived @ Bridgway Towers over 28 & ½ years. We love the idea of a New Arena, etc at Down Town Plaza. We're locate (2) blocks away in Suite #1601.

We see nothing but positives coming out of this New Development. We feel certain that parking can effectively be made available for any and all events. Plus Sacramento needs this desperately to Grow a Dynamic Down.

Best Regards: **George & Lana Trovao**

Sacramento, a city without entrance and exit!

1. There are usually two parts to a freeway entrance: an entrance ramp and an acceleration lane, unfortunately there are not enough exits and entrances in Sacramento.

“Also, ramp meters are claimed to reduce congestion (increase speed and volume) on freeways by reducing demand and by breaking up platoons of cars.”

2. We can't have density with narrow streets; maybe narrower streets are safer and more livable, But not accessible.

3. Recent studies have shown that narrow streets slow traffic and reduce vehicular crashes, increasing neighborhood safety. And could have significant impact on traffic.....

Cannot be down in down town.....

End of the story!

A. Vojdani
amirgayle@hotmail.com

Tue, Apr 23, 2013 2:47 PM